## GENERAL COMMENTS

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<tr>
<td>MM445</td>
<td>Thames Valley Police</td>
<td>Mr Dackombe</td>
<td>1010</td>
<td>General Comments</td>
<td>Para 9.2.74 - Please include &quot;emergency services&quot; in the overview of infrastructure providers.</td>
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<td>MM445</td>
<td>Thames Valley Police</td>
<td>Mr Dackombe</td>
<td>1012</td>
<td>General Comments</td>
<td>Para 9.3.95 - Please include after &quot;new fire station&quot; &quot;and other emergency services infrastructure&quot;.</td>
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<td>MM445</td>
<td>Thames Valley Police</td>
<td>Mr Dackombe</td>
<td>1018</td>
<td>General Comments</td>
<td>Para 9.4.68 - Please include &quot;emergency services&quot; in the overview of infrastructure providers.</td>
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<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Mrs Kent</td>
<td>1143</td>
<td>General Comments</td>
<td>GreenTEA endorses the Eynsham Neighbourhood Plan (ENP) in principle. Members of our community have worked hard to produce the local ENP, which represents the views of all the villagers.</td>
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<td>MM473</td>
<td>Stop Carterton West</td>
<td>Mr Munro</td>
<td>1174</td>
<td>General Comments</td>
<td>The Stop Carterton West campaign group, which as you know represents the views of a substantial proportion of residents in Alvescot and surrounding villages, continues to support the District Council’s draft Local Plan including, broadly, the changes now proposed. We remain unconvinced of the arguments for increasing the housing development target for the District, but understand why WODC has to adopt it.</td>
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<td>MM500</td>
<td>Fifield Parish Meeting</td>
<td>Mrs Hitchens</td>
<td>1238</td>
<td>General Comments</td>
<td>Comments on the West Oxfordshire Local Plan 2031 Submission Draft including proposed modifications. These modifications are needed because the Planning Inspector rejected West Oxfordshire District Council’s original future housing proposals. We were told that those were put forward despite being less than government figures for future housing proposals and that West Oxfordshire District Council was satisfied its proposals would stand up to scrutiny - which turned out not to be the case, hence these modifications. The concern now must be that the new figures are &quot;robust&quot; enough to ensure there is no further delay, since the delay is allowing speculative applications to go to Appeal and, as we all know, in the absence of a confirmed and adopted Plan, many are being granted on Appeal. As overall comments more, clearer and better maps would have been appreciated, so that it is actually possible to see where the sites are and how surrounding areas are affected. Population Figures and House Prices and Sizes The document states that West Oxfordshire District’s population is slightly less young people (aged 0 -15) at 19% than the national and regional averages, but slightly more older people (aged 65 and over), and these trends are expected to continue. At present the working age population (aged 16 - 64) in the District is 62% against the national average of 63%. In 2011 there were 43,200 households in the District, an increase of 4,800 since 2001. House prices in the District are above the national averages but below those in South Oxfordshire District and Oxford City; 69.7% of dwellings are in owner occupation, but since 2001 there has been an increase in those renting privately, taking that figure to 16% - a figure, however, that is still below county, regional and national averages. The concern must be that despite this the majority of houses being built tend to be 4 and 5 bedrooms in size whereas what is needed is dwellings of 2 - 3 bedrooms and consents granted at outline planning stage for dwellings of this size should be constructed at that size and not amended at the detailed stage to dwellings of 4 or 5 bedrooms.</td>
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Our understanding is that the Government wishes to encourage, support and help older people stay in their own homes, perhaps with suitable modifications to the building, as long as possible. There did not seem to be anything in the Plan specifically about that. There seems to be a typing error in paragraph 2.32, in the penultimate line, which reads, “although some some services”.

Sustainable development particularly in small towns and larger villages

Where mention is made of local shopping, public Libraries do not seem to be included. Why this is so is not explained. To become communities and not just dormitories, middle and larger sized developments also need community buildings, which should not be the last thing to be built, or any kind of an after-thought.

Mineral Extraction Sites

Paragraph 2.48 stresses the opportunities for nature reserves, leisure and tourism when mineral extraction ceases, which are all worthy ideals, however the first priority must be that there must be monitoring and proper management to protect the environment and prevent flood risk to land and property. Although the Plan mentioned Light Pollution, Noise Pollution is just as devastating when sites are suddenly no longer needed for their original purpose and noisy leisure activities are permitted in what were previously quiet areas.

Reliance on the private motor car and reference to use of public transport

The documents make many references about the very desirable use of public transport - although it does not mention that this is the year in which many rural villages in West Oxfordshire have lost all commercial services - and of “encouraging” its use, without actually explaining how this is to be done when it does not exist. The corollary of this is that new developments in areas without any public transport i.e. almost all those in rural areas, will automatically ensure above average increased use of the private motor car in the rural areas, clogging up unsuitable rural roads, and creating “rat runs” as commuters seek to avoid traffic jams. There is another concern, which is the question of adequate parking spaceson all new developments wherever they are, but particularly in villages, where the road system, such as it is, was never designed for motor traffic (most were never designed for anything beyond pedestrians and horses), and where there are already serious problems with roads and lanes clogged up with parked vehicles. Serious problems also arise where developers “over-estimated” (to put it as nicely as possible) the space available for parking, and neither the District nor the County Council checks - which actually means Land Registry Plans are then incorrect and there is endless potential for friction between neighbours. It is therefore essential that this matter is properly checked at both planning stages and that houses will have an adequate amount of parking in direct proportion to the number of bedrooms being constructed.

Furthermore applications which remove present off-street parking, or seek to turn small cottages into large houses without providing any space for motor vehicles, should be rejected. The Modified Plan references to public transport are for that which remains - that which has already been lost seems to be ignored. Huge concern remains about the A.40 to Oxford and the delays so often experienced. Those of us who remember when the road was first “improved” in the 1950s remain unable to understand how the problems have not been solved even after all these years.

Respecting the landscape and character of the area and vernacular buildings
This is laudable, although how the West Oxfordshire District Council will control the big housebuilding companies who have, more or less, one set of designs regardless of where the dwellings are to be built, remains to be seen. Hopes are not excessively high. As a side issue why has the area shown south of the Upper and Lower Evenlode Valleys and the Upper Windrush Valley described as,

The Wychwoods “Uplands? Would local inhabitants recognise this description? It is to be hoped that the statements that infrastructure must be provided for new developments will ensure that infrastructure is provided before the new development is commenced, not after the last dwelling is completed, sold and inhabited. This includes community buildings aforementioned.

Supporting Infrastructure

Broadband and Mobile Telephones.

Some parts of West Oxfordshire are still waiting for “superfast” broadband, but many of us would quite simply settle for a completely reliable service for broadband and mobile telephones particularly in the “blackspot” Areas.

Farm Diversity and re-use of non-residential buildings.

Farm buildings which are no longer suitable for their original purposes have long been converted to other uses, usually, but not always, dwellings. It is important that the new uses are sympathetic to the original style of the building and the area. This will be watched with particular interest by those living in the rural areas.

Town Centers

It is good to have the support of the District Council for Witney as a Town Centre for trade, particularly in the year in which the Villager Bus service (that acknowledged lifeline to so many rural villages in the District) was refused access to the Waitrose Car Park by Woolgate Centre staff – who found various reasons for this, ranging from: danger; the car park being no place for a commercial vehicle; annoyance caused to other users; and finally to High Street Traders not wanting the bus to come to the Town anyway. The District Council and Witney Town Council have spent many hours on this problem and everyone is very pleased that a temporary solution has been found, but the disabled passengers on the bus are now in no doubt that while all disabled people and their Blue Badges are equal, some, in the eyes of the Woolgate Centre, are more equal than others.

Noise Pollution

Considerable annoyance is caused by unsuitable sporting re-use of sites which are no longer for their original purpose. Go-Karting at the Little Rissington airfield is one of these, in a very rural area and one in which sound carries over the nearby hilltop to be heard all too clearly by dwellings on the slopes of the Evenlode Valley. The District Council must act much more quickly to complaints from parishes, to prevent consent by default.

Solar and Wind Power and Bio-mass fuel

These sources of energy are here to stay, and it can only be hoped that both solar and wind power are sited as tactfully as possible and that they are productive. Interestingly with the increased use of, wood-fuel, and the
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| MM502         |                         | M J Axtell      | Mr Axtell        | 1240       | General Comments   | These concerning possible changes to the W0 Local Plan are likely to dramatically worsen the potential harm caused by yet more excessive house building in this part of rural Oxfordshire: I feel there should be a total rethink on the whole proposal. Our natural countryside is such a precious asset, with its varied wild plant and animal life which has survived for generations, and once concreted over it is lost forever.

Furthermore, I do not see a need to build high numbers of houses to take Oxford city overflow, particularly as much of this is not intended for local people but newcomers.

Our whole county is now close to capacity, with public services, road systems, schools, hospitals, water needs etc. already hard-pressed.

The delivery rate is completely beyond what has ever been delivered in the past and CPRE believes that it is not realistically achievable. If the District were to fall behind on these targets, it would be vulnerable to much more of the speculative and inappropriate development which we have seen in the area over the last year or so. It seems the system is being set up to fail.

Surely it is not too late to reconsider at least this undesirable escalation of the Local Plan in the interests of... |
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<td>MM513</td>
<td>Chadlington Parish Council</td>
<td>Ms Hill</td>
<td>Chadlington Parish Council</td>
<td>1258</td>
<td>General Comments</td>
<td>protecting our special and unique West Oxfordshire area for generations to come.</td>
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<td>MM58</td>
<td>Allison Swales</td>
<td>Mrs Swales</td>
<td>130</td>
<td>General Comments</td>
<td>I support the Local Plan as it has been submitted now and I particularly support its rejection of development on Alvescot Down known as Carterton West.</td>
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<td>MM629</td>
<td>Richard and Dale Morris</td>
<td>Mr and Mrs Morris</td>
<td>1434</td>
<td>General Comments</td>
<td>The District Council should not have agreed to increase the number of houses to be built in the district. The Council’s original figure of 10,500(7),Whilst still being a big increase, was a more realistic figure for the communities in the District based on independent expert advice. However, I suspect that battle has been lost. The Plan currently assumes that about 50% of the nearly 16,000 homes would be built in the main towns of the District - Witney, Carterton, Eynsham, Chipping Norton and Woodstock. The remaining 8,000 houses appear to be spread rather unequally across many of the villages. West Oxfordshire is the second least populated District in the southeast. More than a third of the District is an Area of Outstanding Natural Beauty, having high landscape value with small Cotswold villages. These villages mostly have poor road connections and service infrastructure. Only a handful of villages are close to the Cotswold rail line. The area was originally agricultural, now there are few employment opportunities. Tourism is a major employer, directly related to its AONB status. Increasing the size of the villages in the AONB will potentially destroy the very quality that makes them important, consigning residents to commute longer distances by car to work thereby putting increasing pressure on an already crumbling road infrastructure.</td>
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<td>MM62</td>
<td>C whiting Miss Whiting 144</td>
<td>General Comments</td>
<td>The District Council should reconsider its allocation of growth, away from the villages an increasing the size of the key towns. The five towns have significantly better communication network and employment opportunities. Having local places to work would reduce the reliance on a car to get to work - something that must be central to the Plan if it is to be sustainable and meet reduced emissions standards. I'm not opposed to all development in villages, but I believe the scale in the Plan is disproportionate. Taking this point further, I wish to comment on the proposed development in my own village, Stonesfield, which I believe illustrates the above points.</td>
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<td>MM721</td>
<td>The Blenheim Palace Estate Neilson 1633</td>
<td>General Comments</td>
<td>8) Numbering of Policies As a minor point, the proposed numbering of the Policies in the Local Plan makes little sense and results in a confusing document. Policy EW1 refers to heritage matters, but Policies EW1a through to EW1d relate to completely different things. They are not, as implied, sub-categories of Policy EW1. This results in the Local Plan appearing unclear and imprecise.</td>
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<td>MM725</td>
<td>Rectory Homes Limited -</td>
<td>General Comments</td>
<td>INTRODUCTION AND SUMMARY Homes Limited (Rectory) who have land under their control at Junction Road, Churchill. The land extends to 1.2ha and is identified on the plan attached as Appendix 1 to these</td>
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ii. Rectory Homes Limited object to the modified WOLP 2021 Policies H1 (MM24), H2 (MM29 and 30) and BC1 (MM200) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.

iii. Edgars Limited have prepared representations on behalf of a number of clients including Rectory Homes which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply.

iv. Land at Junction Road Churchill is under the control of Rectory Homes Limited, is available now and capable of delivering 10 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. The following representations provide further information on the Land at Junction Road, Churchill and should be read in conjunction with Edgars Limited’s representations regarding housing supply which are not repeated in detail in these representations.

vi. These representations demonstrate that the Council’s reasons for rejecting the site in the SHELAA are unjustified. Rectory consider that the site should be allocated in the WOLP 2031 to help address the housing supply deficiencies in the period 2016-2021.

1.0 LAND AT JUNCTION ROAD, CHURCHILL

1.1 Rectory Homes Limited object to Policies H1 (MM24), H2 (MM29 and 30) and BC1 (MM200) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that Land at Junction Road, Churchill should be allocated for 10 homes to help address this deficiency.

Churchill

1.2 The site lies on the south-eastern edge of the village of Churchill which is located in the north-western part of West Oxfordshire 3 miles south of Chipping Norton, the nearest town and service centre.

1.3 The Parish has approximately 270 households and 600 residents (based on 2011 Census Parish statistics). The village has some facilities including a public house, business units at Mount Farm, a community building, recreation ground and church. Hourly bus services connect the village to Chipping Norton and Kingham Station. Less frequent services connect to Witney.

1.4 The village lies within the Cotswolds Area of Outstanding Natural Beauty (CAONB) and is identified in the West Oxfordshire Design Guide as a nucleated settlement in the limestone wolds area and described as: Village located in the north-west of the District, on a hill spur, mainly between the 155m and 165m contours. Topographical containment has led to a compact hillside settlement, with historic parkland to the southeast also constraining growth.

1.5 The settlement historically developed along Junction Road (B4450) becoming the Chipping Norton Road with other historic streets including Hastings Hill, Kingham Road and Sarsden Road. The whole village is...
1.6 The architecture of the village is of a typical Cotswold vernacular including Cotswold stone, steep roof pitches, slate or stone slate roofs, with features such as dormer windows.

1.7 Many buildings front the principal streets but there are several examples of development in depth, extending into the backland area - such as the farm complex at Mount Farm, Hackers Lane and William Smith Court north west of Junction Road. A historic track runs to the rear of Junction Road and Haughton House enclosing areas of historic backland development.

1.8 To the east of the village the land drops down toward the Sars Brook beyond which, on the opposite side of the valley, is the Sarsden Estate and Registered Park and Garden (Grade II*).

1.9 All Saints Church is a prominent landmark within the village and wider landscape. Its prominent tower was rebuilt for James Langston of Sarsden House in 1826 to resemble Magdalen College tower in Oxford and is a viewpoint for the Sarsden north park and Glebe parkland. A former view toward the church from the north front of Sarsden House has now been blocked by mature woodland.

The site

1.10 The site itself comprises 1.2ha principally comprising semi improved grassland and a large modern agricultural building with a block and steel construction.

The site is separated from the road by an overgrown verge/hedge. The eastern and southern boundaries are marked by tree line hedgerows.

1.11 To the north, the site lies adjacent to Greystone a listed dwelling (Grade II) and is separated by a stone wall.

1.12 There is an open fronted vernacular cart shed in the northern corner of the site with a self-contained yard. The building forms part of a range attached to South Mount (listed Grade II).

1.13 On leaving the village there are attractive views beyond Greystone across the wider Cotswold landscape. The site frontage is prominent but the lower eastern parts of the site are screened by the boundary vegetation and topography.

1.14 The site slopes down towards the Sars Brook to the east with long views south and east across the Sars Brook valley towards the Sarsden Estate and Historic Park and Garden (Grade II*).

1.15 The existing modern agricultural building is prominent in views from the Sarsden Estate with the rest of the village also sitting on higher ground and forming a built-up backdrop to the site.

1.16 The site lies within Flood Zone 1 Low Risk according to Environment Agency Flood Maps (applicable to planning).

1.17 A site location plan is attached as Appendix 1.

2.0 STRATEGIC HOUSING AND ECONOMIC LAND AVAILABILITY
ASSESSMENT (SHELAA)

2.1 The site has been considered by the Council in the SHELAA as Site 400. The site is identified as Available and Achievable but is not considered suitable by the Council for the following reasons: Harm to the character and setting of the village and landscape character of the AONB. Would also create a potential precedent for further development to the south. Development of this site for housing or employment would not represent a logical complement to the existing built form of the village extending it southwards into open countryside.

2.2 Rectory Homes Limited object to the SHELAA and consider the site to be Suitable, Available and Achievable. The reasons given by the Council for concluding that the site is not suitable are considered and responded to below and in the attached technical documents. Rectory Homes Limited is preparing a planning application and has undertaken a significant amount of technical work which demonstrates that the site is suitable, available and achievable. This planning application and associated documentation is expected to be available to the Local Plan Inspector when the examination resumes. Particularly relevant technical work, including a development layout and Landscape and Visual Appraisal is referred to below and in the Appendices.

INTRODUCTION AND SUMMARY

* i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited (Edgars) on behalf of Rectory Homes Limited (Rectory) who have land under their control at Witney Road, North Leigh. The land extends to 8ha and is identified on the plan attached as Appendix 1 to these representations.

* ii. Rectory object to the modified WOLP 2031 Policies H1 (MM24), H2 (MM29 and 30) and EW2 (MM183) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.

* iii. Edgars Limited have prepared representations on behalf of a number of clients including Rectory which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply.

* iv. Land at Witney Road, North Leigh is under the control of Rectory Homes Limited, is available now and capable of delivering 100 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

* v. The land was previously recommended for allocation by the 1997 Local Plan Inspector.

* vi. The following representations provide further information on the Land at Witney Road, North Leigh and should be read in conjunction with Edgars representations regarding housing supply which are not repeated in detail in these representations.

* vii. The representations acknowledge that the Council accepts the site is suitable for development in the SHELAA but also respond to the Council's assessment that only part of the site is suitable for 20-30 homes. Rectory has undertaken significant technical work and has submitted a planning application which
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<td>* viii. Rectory consider that the site should be allocated in the WOLP 2031 to help address the housing supply deficiencies 2016-2021.</td>
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<td></td>
<td>1.0 LAND AT WITNEY ROAD, NORTH LEIGH</td>
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<td>1.1 Rectory object to the modified WOLP 2031 Policies H1 (MM24), H2 (MM29 and 30) and EW2 (MM183) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that Land at Witney Road, North Leigh should be allocated for 100 homes to help address this deficiency.</td>
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<td>1.2 North Leigh village lies 3 miles (4.5km) north east of Witney, alongside the A4095 Witney to Woodstock Road.</td>
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<td>1.3 The village historically developed along Park Road, Common Road, New Yatt Road and Church Road where historic built form is typical of the local Cotswold vernacular, with buildings constructed of the local creamy limestone. Although originally developing in a linear form around historic roads, the previously dispersed elements have been bound together by modern infill including at Windmill Road immediately to the north of the site.</td>
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<td>1.4 North Leigh today has approximately 800 houses and 2,000 residents (based on 2011 Census Parish Statistics). The village has a number of facilities which include a primary school, post office, library, football club, garden centre and business centre. All of these facilities are within reasonable walking distance from the site being within a 10 minute walk with key facilities including the school and post office within a 5 minute walk of the site.</td>
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<td>1.5 Although there are existing play areas in the village, the lack of any substantive village green area for recreation was identified through consultation with local people and this has informed the proposals.</td>
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<td>1.6 North Leigh is well located to access other centres of employment, particularly in terms of its proximity to Witney and Long Hanborough – the latter including the area’s main rail station with connections to Oxford and London.</td>
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<td>1.7 Witney is the largest settlement, service and employment centre in the area. Located within 5km to the west, it is within reasonable cycling distance and is connected by an off-road cycle route alongside the A4095.</td>
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<td>1.8 To the west, the A4095 connects North Leigh to Long Hanborough, Woodstock and the A44, an arterial route into Oxford. Long Hanborough is a further employment centre in the area which adjoins Hanborough Station 5km to the west. An off-road cycle link also runs alongside the A4095 to Hanborough Station which is within reasonable cycle distance. This is the main station in the area providing rail services to Oxford and London and has been identified as a location for investment to improve facilities and the frequency of services.</td>
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<td>1.9 Hourly bus services operate along the A4095 via North Leigh connecting the village to Witney, Oxford, Hanborough Station, Woodstock, Burford and Carterton.</td>
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<td>1.10</td>
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<td>The site comprises 8ha of land on the southern edge of North Leigh and is currently in agricultural land use as pasture. It is divided by hedgerows into 3 broadly rectangular fields and a smaller triangular parcel of agricultural land in the western corner. A site location plan is attached as Appendix 1.</td>
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<td>1.11</td>
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<td>The land generally rises to the north but also undulates along its length.</td>
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<td>1.12</td>
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<td>The site is contained to the north and west by existing modern residential development along Common Road, Windmill Road and Windmill Close. This housing is mostly two storey to the west and single storey bungalows with box dormers to the north. These dwellings are separated by a treed hedgerow with some high quality trees on this boundary.</td>
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<td>1.13</td>
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<td>To the north east is a community recreation area and further modern residential development also separated by a treed hedgerow.</td>
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<td>1.14</td>
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<td>The site is bounded by the A4095 to the south with tree and hedgerow planting filtering views of the site. A single dwelling Bell Close lies on the southern boundary within a triangular plot and which is excluded from the site.</td>
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<td>1.15</td>
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<td>There is a Thames Water Pumping Station with associated infrastructure at the south-western corner of the site.</td>
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<td>1.16</td>
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<td>On the southern edge of the A4095, opposite the site, lies the Eynsham Hall Registered Park and Garden (Grade II) which contains a number of listed buildings including Eynsham Hall (Grade II). The boundary to the park is comprised of dense woodland belts which contain the parkland visually and physically. Along with the A4095, these woodland belts provide a further degree of separation of the site from the wider parkland landscape to the south.</td>
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<td>1.17</td>
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<td>Given the containment of the site by the existing village, A4095 and woodland belts, the site is not visible in the wider surrounding landscape. Available views of the site are limited to locations within the immediate proximity of the site, within the context of the existing village. This includes views when travelling along the A4095, from the recreation area to the east and from residential dwellings and roads to the north in the village. A detailed photograph record of available views of the site is contained in the submitted Landscape and Visual Appraisal (LVIA).</td>
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<td>1.18</td>
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<td>According to Environment Agency Flood Maps, the site lies within Flood Zone 1, Low Risk (applicable to planning). There are no statutory other designations pertaining to the site or public rights of way across it.</td>
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* 1.19 An overview of the relevant site constraints is presented in the Site Constraints Plan (Appendix 2) and in summary identifies the following key site considerations: 1. Potential to provide a substantive new village green accessible to the wider village and improve access to the existing recreation ground; 2. The undulating topography of the site with higher ground to the north adjacent Windmill Road; 3. On site landscape and ecological features including boundary and internal hedgerows and trees; 4. Although contained and separated visually from the wider landscape, there are existing views from adjoining dwellings and roads; 5. Access opportunities to Windmill Road to the north, the existing recreation area to the west and the A4095 to the south and associated sustainable transport opportunities; 6. The setting of Eynsham Hall Park although itself contained and separated from the site by the A4095 and dense woodland belts; and
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<tr>
<td>MM728</td>
<td>Abbey Developments and David Wilson Homes Southern</td>
<td>-</td>
<td>-</td>
<td>1654</td>
<td>&gt; General Comments</td>
<td>* · Existing drainage infrastructure easement along the western boundary; 1.20 Rectory has submitted a planning application including a number of technical documents which assess and address the impacts of the development. This technical work and the site opportunities and constraints has informed the development of an illustrative masterplan for the site which is attached as Appendix 3.</td>
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**Context**

Witney is identified as one of the three Main Service Centres within the West Oxfordshire Local Plan 2031 Settlement Hierarchy (Table 4.1) and to which the greatest proportion of future housing development is proposed to be steered through Policy HI of the Local Plan. Paragraph 9.2.1 of the Local Plan states that:

"Witney is the District’s largest town, acting as the main service centre and offering a broad range of housing and employment opportunities as well as key services and facilities including retailing, health care, leisure and culture." (our underlining)

As we set out in detail below, whilst we are generally supportive of the proposed increases in housing provision, for the District as a whole and for the Witney sub-area, we consider that a further increase to address the full Objectively Assessed Housing Need (OAN) in the District is justified. Furthermore, even without any further increase in the level of housing now proposed by the Council in the Local Plan, additional land is required in order to ensure the requirements are met.

**South Witney**

Abbey Developments own freehold the northern part of the site and DWH control the remainder of the site. The land which totals approximately 106.86 hectares of land at South Witney is being promoted jointly by Abbey Developments and DWH as a strategic development area (SDA) for a residential-led scheme with capacity for up to 1,200 homes, supporting retail/community uses and public open space.

The site is located immediately to the south of the MO, west of Ducklington Lane, east of Bampton Road and north of Curbridge Lane. A Site Location Plan is provided at Appendix 1.

**Duty to Cooperate**

With respect to cooperation with other authorities in the Housing Market Area (HMA), whilst West Oxfordshire District Council appears to have addressed the agreed apportionment of Oxford City’s unmet housing need by accepting an additional 2,750 homes at Eynsham, the Council will need to publish evidence in response to the Proposed Modifications to demonstrate that WODC has engaged with its neighbours to consider the implications for the continuing validity of the SHMA’s recommendations for the other authorities and whether the 660 homes per annum is accepted as an effective response by neighbouring authorities.

Whilst the 2,750 homes proposed at Eynsham are derived from the deliberations of the Oxfordshire Growth Board and how the 15,000 assessed un-met housing needs of Oxford City would be split between the Oxfordshire districts, it is recognised that South Oxfordshire did not agree. Therefore, West Oxfordshire will need to demonstrate that there is agreement with the other authorities in Oxfordshire that 2,750 homes is their contribution towards addressing the City’s un-met housing needs.

The Council’s latest Annual Monitoring Report confirms that in his preliminary findings on the Local Plan the Inspector was able to conclude that the Council had fulfilled the duty to co-operate. Further consideration will
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<td>Abbey Developments and David Wilson Homes Southern</td>
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<td>1678</td>
<td>&gt; General Comments</td>
<td>be given to cross-boundary matters of strategic importance when the Local Plan Examination resumes in December 2016 and the Council’s duty to co-operate statement should be updated accordingly.</td>
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Conclusion

The Council's strategy for development within West Oxfordshire as set out within the Local Plan Main Modifications is fundamentally flawed and unsound. Housing delivery is reliant on proposed allocations of undeliverable or unsuitable sites. In order to deliver a sound plan, additional deliverable site allocations are required which must be available to bring forward housing development in the short to medium term.

Whilst the increase in housing numbers is acknowledged, it must be highlighted that full OANIs 688dpa which would meet affordable housing need in full. Accordingly, we object to MM422 in that whilst it represents an uplift to the previous draft Local Plan figure, it still fails to address affordable housing need. A supplementary Barton Willmore Report is appended to this representation which critiques PBA’s methodology for housing need. It is concluded that 688dpa should be an absolute minimum requirement for addressing housing need. Changes should therefore be made to Policy H1 to reflect the need to plan for 688dpa.

The Council’s Housing Land Supply Position Statement October 2016 indicates that Eynsham will ‘kick in’ from 2021 onwards as ‘agreed’ through the joint work at the Growth Board: such a view is not supported by the statement from the September 2016 OGB report which emphasises the sovereign nature of Local Plans in identifying land to address unmet need. Rather than the response to delivery new homes to meet unmet needs ‘kicking in’ in 2021, this should be seen as ‘kicking the can’ down the road. Unmet need, is, by definition, unmet.

It is counter intuitive for the Council to hold the view that the present day need for housing should be addressed in 5 years’ time or beyond. The Inspector’s Preliminary Findings (IN015) confirmed that if the Council failed to consider the implications of unmet housing needs the plan would be out of date before it can be adopted. The inescapable conclusion to this is that unmet housing needs should begin to be addressed at the time of adoption of this plan: arguably now. Were that not the case, logically an early review which gives time to consider and then respond to unmet needs would be appropriate, which it is evidently not.

West Oxfordshire’s approach to this issue is therefore wholly contradictory: the timing of its plan enables the Council to seize the opportunity to deliver new homes to meet unmet housing needs from the City of Oxford, yet to put this off until after 2021 will simply fail those who are presently in need of a new home. One cannot meet today’s needs tomorrow.

Furthermore, it is considered a key concern that there is too high a reliance on development which will deliver after 2021 within the plan as a whole. The Council’s Housing Land Supply Position Statement October 2016 indicates only 1,035 homes out of B,169 dwellings on proposed allocation sites in the draft Plan will occur prior to 2021: that is a paltry 12.6% or 207dpa. This will only address a little over half of the current backlog let alone what is needed going forward. This extreme low delivery for the first 10 years of the plan risks exacerbating affordability challenges district wide and places further stress on housing need.

Given our representations made in respect of:

1. The inadequacy of the overall housing requirement - which should be 6BBdpa (560 more homes in the plan period);

2. The unrealistic prospect that Eynsham Garden Village will deliver entirely within the plan period at a rate of
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<tr>
<td>MM67</td>
<td>Miss Kirsty Garrett</td>
<td>Miss Garrett</td>
<td>Garrett</td>
<td>170</td>
<td>&gt; General Comments</td>
<td>I would like to object to the proposed local plan for a number of reasons, and will go into further detail about my specific objections in line with the relevant sections of the consultation. However, there are some basic assumptions, contained in the introduction, that I would like to challenge:</td>
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1. You suggest that this level of development is required to support economic growth, and yet in section 2.20 you note that “West Oxfordshire has a strong and resilient local economy” already! |

2. The plan takes account of the inability of Oxford city to deliver sufficient housing to meet its own requirements. The proposal is to place the housing 15 or more miles from Oxford, in towns and villages that are not linked via remotely reasonable public transport services to Oxford. Furthermore, the roads linking the proposed areas of development to Oxford are already unacceptably congested at peak times of the day. It is my suggestion that Oxford city should be compelled to reconsider its proposed housing levels. |

3. The introduction states that “A key challenge for the Local Plan is to deliver the new development that is needed to support economic growth in a way that does not compromise the quality of life and the environment enjoyed by those who live and work in the District”. I would respectfully counter that roughly doubling the size of towns such as Chipping Norton, which already suffer from poor air quality and congestion, will significantly compromise the quality of life and environment of those who already live there. |
4. I do not consider that the proposed modification complies with the duty to co-operate, as it is being imposed upon local areas that have previously sought to co-operate with the provision of housing in a constructive manner - without taking their reservations about the increased scale of the proposed schemes into account.

Summary and Conclusion

We support and welcome the need to deliver new homes, and that housing will have to be delivered within the CAONB, (including the Burford-Charlbury sub-area which ‘it washes over’).

However, we question the basis on which the Council have set out how the new higher indicative housing total will be delivered.

We are of the view there is a need to fully consider the impact of development (including the effects on the CAONB where applicable), in order to understand what can realistically be expected to be delivered on all strategic and non-strategic allocated sites upon which the Council are relying.

A full, detailed examination of the suitability, capacity, and impact of these allocated sites is essential to understand their ability to come forward to deliver the levels of housing stated by the Council. The Council are relying on untested capacity of draft allocated sites to be deliverable and at the stated levels which, combined with windfall development, make up a significant proportion of their stated delivery.

The Council have made a series of assumptions and are relying on matters which are the subject of current consultation and future examination for the purposes of seeking to demonstrate a 5 year housing land supply.

The advice set out at paragraph 216 of the NPPF is, therefore, that very limited weight can be given to the District Council’s statement on their 5-year housing land supply set out within the proposed modification MAIN 29.

The housing figures are likely to change. The means to which the Council will meet their increased targets is uncertain, and untested.

The stated figures cannot be reasonably relied upon to deliver the levels of housing demanded by the new increased requirements for the District.

There are a series of proposed changes to West Oxfordshire Local Plan 2031 Submission Draft Including Proposed Modifications which are therefore UNSOUND.

MAIN 187 and MAIN 200 should be amended to include the ‘land south of Grammar School Hill, Charlbury’ site as a non-strategic allocation.

1.1 This submission is in response to the above consultation and provides Gladman Developments Ltd’s (Gladman) representations on the Main Modifications to the West Oxfordshire Local Plan 2031 (WOLP). This follows our previous submissions in our statements to the Local Plan Examination in Public (EiP) held in November 2015.

1.2 Through our previous representations to the Council and the EiP, Gladman has submitted that the Plan fails to meet the full objectively assessed needs for housing within the District, that the proposed housing target is founded on a deficient evidence base, that the Plan will fail to deliver the required level of homes and affordable homes and that in a number of aspects the Plan is not in accordance with the National Planning...
Policy Framework (NPPF).

1.3 The Council has now prepared a significant list of main modifications which seek to make the plan 'sound'. Whilst welcoming the preparation of this work and in support of some of the changes made by the Council, Gladman still has serious concerns about the plan. Even with the proposed main modifications, it is not considered that the plan is fundamentally sound in respect to a number of points.

1.4 The NPPF sets out four tests that must be met for Local Plans to be considered sound. In this regard Gladman reiterates that the WOLP is not:

* Positively Prepared – The Council proposes to use the Liverpool methodology in calculating its 5 year supply of housing land as opposed to the Sedgefield approach advocated by National Planning Practice Guidance (despite the Council’s position and the outcome of a number of recent appeal decisions that the Sedgefield method is most appropriate and would accord with the NPPF). As a consequence, the Plan will not deliver a significant boost in housing supply and recover the significant unmet needs since 2011 in the years immediately following adoption.

* Justified – The selection of new strategic housing sites in the Eynsham/Woodstock Sub-Area has not been subject to a robust Sustainability Appraisal considering all reasonable alternatives

* Effective – There is no evidence that the Plan has identified sufficient available and developable housing land to produce a 5 year supply of housing land upon adoption; and

* Consistent with National Policy – In a number of instances the Local Plan is inconsistent with the requirements of the NPPF and Planning Practice Guidance.

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**Duty to cooperate and Strategic Planning**

We are most encouraged by the provision that is being made through the Modified West Oxfordshire Local Plan for the Council to accommodate an element of Oxford City’s unmet housing need. The Council’s cooperation with the other authorities on this matter is to be commended. The HBF strongly supports this aspect of the modified plan. As the other Oxfordshire local councils follow suit with similar commitments in their emerging or revised plans (e.g. Vale of White Horse - to bring forward provision via a Part 2 Plan; Cherwell to review its Plan; South Oxfordshire – a commitment hopefully in its emerging local plan) we are hopeful that the long-standing problem of Oxford City’s housing problems might begin to be solved over the next decade.

We note through the Proposed Main Modifications that the West Oxfordshire Local Plan will make provision for 2,750 homes to meet an element of the Oxford City’s unmet need. We note in paragraph 5.13 that the Oxfordshire authorities are cooperating on the basis of an agreed working assumption that Oxford City’s unmet need housing need will amount to about 15,000 homes. We agree that it is sensible to plan on the basis of this as a provisional figure. It will be impossible to anticipate what the precise unmet need figure is for Oxford City, but any uncertainty over the precise number should not be used as an excuse to delay proper cross-boundary planning.

While we strongly support the Council’s commitment to plan for an element of Oxford City’s unmet need it is unclear how the Council has arrived at the figure of 2,750 homes.

It is unclear from the Proposed Mods how the Oxfordshire authorities have agreed this apportionment, or whether this was a judgement made by West Oxfordshire Council. We think it may be an agreement by the Oxfordshire Growth Board but it isn’t clear. The Proposed Mods consultation is unsupported by a study explaining how the unmet housing need has been divided up, and what the other authorities are committed to take. If all four satellite Oxfordshire authorities (Vale of White Horse, Cherwell, South Oxfordshire, West
Oxfordshire) took broadly the same number (2,750 homes each) that would amount to 11,000 homes, and it would leave 4,000 still to be accommodated.

We are also aware from the Vale of White Horse inspector’s main modifications to the local plan (30 November 2016) that a precise figure is not included for Oxford City’s unmet need that the Vale is committed to accommodate (Main Modification Number 2). We assume that the precise number of homes to be apportioned to the Vale of White Horse area will be the subject to further discussion with the Oxfordshire Growth Board. It is therefore still unclear at this juncture whether adequate provision will be made for all of Oxford City’s unmet needs. We think the West Oxon local plan should provide a clearer indication of what the collective provision for Oxford City’s unmet need will be and what the residual shortfall, if any, will be.

We are pleased to submit representations to the proposed modifications to the Local Plan. These representations relate specifically to the Derrymerrye Farm, Old Witney Road, Eynsham, OX29 4PU (the “Site”), a plan of which is attached.

Goldfield Estates Ltd, which is a joint venture between Jansons Property and the William Pears Family Trust has recently acquired an interest in the above noted site, located to the immediate south of the A40 to the west of Eynsham. Goldfield Estates are seeking to promote the Site for residential development, in conjunction with the land owner. It is anticipated that a pre-application submission will be made in early 2017 with a view to submitting a planning application during 2017.

The Site comprises 7.2 ha of land. It is anticipated that the Site could accommodate in circa 200 new dwellings. To date we believe that representations have been submitted by Berkley Homes to promote this Site. The Site represents a very real opportunity to bring forward residential development to meet the identified housing need within the Borough and also the wider district. The Site also represents an opportunity to maximise the delivery of the proposed Park & Ride facility and could part fund the highways infrastructure (via CIL and S106 contributions) required to create a new junction to the A40 that has been identified to the immediate north of the Site. For these reasons we strongly support the allocation of the Site for residential development which is set out through the proposed modification to the Local Plan.

The Local Plan, as previously submitted for Examination in public did not propose to allocate the Site for development but it identified Eynsham as being a focus for growth with housing to be delivered through completions, existing commitments, SHLAA sites and windfall development. The submitted Plan also identified that there was some scope for further expansion on the fringe of the village, specifically on land to the west.

The key consideration of relevance to these representations is the proposed increase in proposed housing delivery from 10,500 in the plan period (to 2031) to 15,950 new dwellings. The proposed increase in dwellings accounts for the revised calculation for the Oxfordshire Strategic Housing Market Assessment (13,200) plus an element of ‘unmet’ housing need from Oxford City (2,750).

A significant proportion of the proposed new dwellings will be accommodated at Eynsham with 2,200 new homes at the proposed Garden Village and 1,000 new homes located to the West of Eynsham.

We are instructed on behalf of our clients, David Wilson Homes Southern (DWH) and Bloombridge Development Partners, to submit representations to the West Oxfordshire District Council ("WODC") consultation on the Proposed Main Modifications for the submission Local Plan 2031. In summary, we consider:

1. WODC still has not addressed the full OAN - 688 dpa. Unmet need to date (shortfall) is a
particular problem - 1,836 homes. It is counter intuitive for the Council to hold the view that the present day need for housing should be addressed in 5 years' time or beyond.

2. The sites proposed by the Main Modifications are not justified by the evidence and they are not reasonable or deliverable alternatives in comparison to the housing and economic potential of Carterton, West Oxfordshire's second largest settlement and home to RAF Brize Norton, the so called 'Superbase'.

3. Carterton is relatively unconstrained and, as set out in the Carterton Town Master Plan, it is a settlement in West Oxfordshire where further development will be particularly and plainly beneficial - to help regenerate the town centre and make the most of RAF Brize Norton as an economic asset. The town is not subject to any specific policies that would indicate that development should be restricted (NPPF, paragraph 14, Footnote 9) and, helpfully, Carterton is one of the most affordable housing markets in the County, thereby widening the accessibility of home ownership.

It is odd that WODC has not addressed the potential of Carterton. Even with the adjournment of th EIP in November 2015, there has been no engagement with our clients to understand the potential of a 'North Carterton' strategic allocation, despite representations and the submission of a series of master plan proposals over the last five years.

The Town Council published the Carterton Town Master Plan in April 2015 and, responding to that, David Wilson Homes and Bloombridge have now joined forces to deliver development in a series of phases which, crucially, also addresses the needs of the town (regeneration) and surrounding parishes (green buffers and an extended country park) in a sustainable way.

Two sites are being promoted as detailed below, and which have been subject to previous representations to the Submission Draft Local Plan made separately on behalf of each client:

Land North of Swinbrook Park, Carterton

David Wilson Homes Southern are promoting land for 115 homes with public open space and affordable units provided onsite. The scheme, master planned and assessed in detail, also provides a significant area of land to form an extension to the Kilkenny Country Park as well as significant landscape enhancements particularly adjacent to Shilton Road. DWH own and control the land in its entirety and are able to deliver housing now, subject to the grant of planning permission, and complete prior to 2021.

Land North of Carterton, Kilkenny Farm

Bloombridge Development Partners are jointly promoting land at Kilkenny Farm with David Wilson Homes Southern, having recently entered into a formal joint venture. The land comprises 250 acres (100 Hectares), it is held under a long term option, and runs contiguous with the proposals for Swinbrook Park. The Kirkham Landscape Appraisal (2012), the Council's own evidence, identified this land as being capable of accommodating up to 750 homes below the 110m contour. No further land assembly is required.

We support the promotion of a sustainable master plan for up to 750 homes at Kilkenny Farm. As part of this proposal an initial phase of 300 homes is capable of being delivered in the first five years of the plan, subject to allocation and the grant of planning permission, to meet unmet housing need without harm to the character of its context. This is consistent with the Carterton Town Master Plan.

In terms of effectiveness of this proposal, David Wilson Homes have delivered more houses in
Carterton than any other housebuilder (in excess of 1,200) and, as a company, delivered 17,319 across the country last financial year.

These representations are made in response to the West Oxfordshire Local Plan 2031 SUBMISSION DRAFT INCLUDING PROPOSED MODIFICATIONS November 2016 and should be read in addition to the previous representations made as part of the Local Plan process.

**Duty to Cooperate**

With respect to cooperation with other authorities in the HMA, whilst West Oxfordshire appears to have addressed the attribution of unmet need by accepting an additional 2,750 homes at Eynsham, the Council will need to publish evidence in response to the Proposed Modifications to demonstrate that WODC has engaged with its neighbours to consider the implications for the continuing validity of the SHMA’s recommendations for the other authorities and whether the 660 homes per annum is accepted as an effective response by neighbouring authorities. The latest Annual Monitoring Report confirms that in his preliminary findings on the Local Plan the Inspector was able to conclude that the Council had fulfilled the duty to co-operate. Further consideration will be given to cross-boundary matters of strategic importance when the Local Plan examination resumes in December 2016 and the Council’s duty to co-operate statement will be updated accordingly.

Whilst the 2,750 homes proposed at Eynsham are derived from the deliberations of the Oxfordshire Growth Board and how the 15,000 assessed un-met housing needs of Oxford City would be split between the Oxfordshire districts, it is recognised that South Oxfordshire did not agree. Therefore West Oxfordshire will need to demonstrate that there is agreement with the other authorities in Oxfordshire that 2,750 homes is their contribution towards addressing the City’s un-met housing needs.

**Context**

Carterton has been identified as a Main Service Centre (MSC) within West Oxfordshire’s Local Plan 2031 Settlement Hierarchy (Table 4.1) of which a significant proportion of future development should be steered. The vision for Carterton is very much to strengthen its role as this MSC proportionately and seeks both housing, business developments and associated infrastructure alike.

**Spatial Strategy**

The Council's Spatial Strategy as envisaged through the Main Modification is fundamentally flawed as it fails to spatially recognise the importance of supporting the role of Carterton through not only the under provision of housing, but also the proposed allocation of what is considered to represent a reliance on undeliverable sites. We argue that not enough consideration has been given to the role and prominence of Carterton as a Main Service Centre and in general within the District the proposed allocations have been distributed widely and without sufficient regard to the spatial strategy which had been assessed through the Sustainability Appraisal.

We are also concerned that the potential job growth associated with the relocation of services from RAF Lyneham to RAF Brize Norton has not been captured in the baseline economic forecasting, and this significant above trend job increase may lead to a further increase in housing requirement in West Oxfordshire or as a minimum require a refocussed distribution of housing to Carterton. The 2,500 jobs from RAF Lyneham, given the move commenced in July 2011, clearly were not captured in the Census, given the Census Date is March 2011. It is considered that Carterton has a vital role within the District and is capable of accommodating significant growth to the north of the town without changing its intrinsic character.
There has not been sufficient regard to Carterton Town Council's Masterplan and their Spatial Strategy which seeks development to the north of Carterton, providing significant employment provision, new facilities, infrastructure and a Country Park extension. Fundamentally, the Plan should not be putting forward sites which are questionable in terms of delivery, especially when these sites are not consistent with the Council's spatial strategy (i.e. Carterton before the smaller, more constrained settlements).

Housing Need and Affordability

The plan is considered not to suitably address housing need despite the uplift in numbers. There has been insufficient development in the first five years (up to 2016) which is further increasing unmet need. The Council assert that the residual Liverpool method is most appropriate to address the 1,836-dwelling backlog (excluding Oxford City unmet need) from 2011-2016 rather than Sedgefield which is recognised in Planning Practice Guidance (PPG).

However, in an appeal decision dated 25th July, 2016 at Milton-under-Wychwood1, the Inspector concluded that "Housing land supply in the District is less than 2 years. Such a shortfall must be regarded to be severe." Furthermore, in an appeal decision on 15th May, 2016 at Eynsham2, the Inspector acknowledged (paragraph 56) that whilst a 5% buffer was appropriate at that time, "if delivery continues to be below that which is required, future decision makers may take a different view as regards the appropriate buffer to apply". Since the Main modifications have amended the target, it would be appropriate to reassess if a 20% buffer should now be applied.

Alongside this context of a severe shortfall in housing delivery, the report of the Oxfordshire Growth Board Post SHMA Strategic Work Programme report3 states that:

"133) The Programme is not seeking to allocate or release sites, but has at a high level and using a common basis, through the work streams; identify the evidence of each district's ability to absorb additional growth to meet a share of Oxford's unmet need. It will be for each of the districts through their normal Local Plan processes to allocate sites sufficient to meet their proposed share of Oxford's unmet need under the requirements of the Duty to Co-operate.

134) It is also important to note that the yield figures for each area of search represent estimated housing numbers to be delivered by 2031 - total capacities at a number of these sites may change through local assessment as part of the more detailed Local Plan process, taking a wider range of planning factors into account, including the potential to deliver further housing beyond 2031."

MM22 Paragraph 5.17 asserts that the delivery of unmet Oxford City housing need at North Eynsham will be delivered in the period 2021 to 2031 - which would require delivery of 220 dwellings per annum from a standing start in 2022: itself highly optimistic - rather than address unmet needs also within the first 5 years of the plan period. Whilst it is not disputed that Eynsham will not deliver prior to 2021, this underlines the need for the Council to augment its housing land supply to identify and allocate additional land for housing in the short term to meet housing needs in the first half of the plan period. This is especially important given the significant shortfall of 1,836 homes, the serious affordability concerns in the district (house prices 10 times lowest incomes) and in light of the Inspector’s preliminary findings that it was his initial view that unmet need would need to be taken into account in calculating the 5-year land supply (Paragraph 7.6 (IN015)).

Instead the Council's Housing Land Supply Position Statement October 2016 simply indicates that
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Carterton provides a unique opportunity within the District to provide housing in the only Low Value Zone in one of three Main Service Centres and in the second largest town in the District. The Sustainability Appraisal accompanying the original submitted plan emphasises the suitability of the strategy of concentrating growth around the three main towns - this approach is being undermined by the Main Modifications through the limited additional allocations around Carterton. As outlined within this response we object to the revised distribution of development in Policy Hl (MM24) in that although Carterton is recognised through the Council's evidence as one of the most sustainable locations for growth, a higher proportion of the district's growth is proposed within the more constrained Eynsham - Woodstock sub-area, irrespective of the additional growth envisaged in the Garden Village.

Affordability within the county as a whole is a significant problem as identified in the SHMA 2014, however, it is considered an opportunity for the plan to allocate additional housing with an early delivery to Carterton and address the problem as soon as possible. The WODC Sustainability Addendum Report (October 2016) recognises the benefits of a focus on the three main service centres:
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"With a focus on Witney, Carterton & Chipping Norton (and limited dispersal across the District), major positive effects remain for meeting the housing and employment needs across the District. Minor positive effects also continue to be likely for communities and accessibility since the focus is on the main service centres; minor negative effects for road transport, although the focus on the 3 towns can encourage improvements in sustainable transport modes within the towns. Negative effects on landscape are likely to be minor, compared with a focus at Witney, as the effects are spread across the 3 main service centres."

We have sought an independent economic view from SQW, and their views have informed this section of our representations. SQW's letter is submitted with these representations (Appendix 6). Our clients instructed SQW owing to their leading role as economists advising on the Oxfordshire market, having worked with Bloombridge on Oxford's Northern Gateway (2006), Oxford Technology Park (consented in 2016) and Silverstone (2012), and being the authors of the Oxfordshire Innovation Engine Report (October 2013).

SQW make the trite point that Oxfordshire is crucially important in relation to the UK's future economic prospects. Oxfordshire's pedigree is well known. Its assets include the University of Oxford (one of the top five universities in the world on every "league table"); the centres of "big science" at Harwell and Culham (which have attracted substantial scientific investment); and the growing number of outstanding science-based businesses, some of which are genuinely leading edge and attracting significant investor interest (e.g. Adaptimmune and Immunocore; Oxford Nanopore Technologies; Sophos, etc.). These assets are world class. They are all the more important when they are understood as part of the UK's Golden Triangle - one of the biggest concentrations of knowledge-based assets in the world.

Following the outcomes of both the referendum on the UK's membership of the European Union and the American presidential election, major geopolitical changes are on the horizon. This is leading to much economic uncertainty. It is affecting growth prospects and national growth forecasts have been scaled back significantly. The Office for Budgetary Responsibility published very cautious forecasts t accompany the Chancellor’s Autumn Statement in November 2016, and the Bank of England has been similarly circumspect. Against this backdrop, the importance of Oxfordshire as a driver of the UK economy has grown. The County needs to outperform in order to cover for lagging and underperforming regions elsewhere in the UK.

Within this context, the National Infrastructure Commission (NIC) recently published its Interim Report on the Cambridge-Milton Keynes-Oxford corridor (essentially the northern "axis" of the Golden Triangle referenced above). Its central finding was that a lack of sufficient and suitable housing presents a fundamental risk to the success of this area. Further, it suggested that "without a joined-up plan for housing, jobs and infrastructure across the corridor, it will be left behind its international competitors". The importance of these findings became apparent in the Autumn Statement. Against this backdrop of continuing fiscal constraint, it prioritised investment in some of the key infrastructure requirements identified by NIC - notably east-west rail and the Oxford-Cambridge Expressway. Throughout, the rationale was the need to "maximise the potential of the Cambridge-Milton Keynes-Oxford corridor as a single, knowledge-intensive cluster that competes on a global stage".

There are then both assets and imperatives relating to Oxfordshire's knowledge economy, and these have become even more significant nationally as forecasts for the growth of the UK economy have been scaled back.

The potential significance of land at Carterton - a settlement in West Oxfordshire with around 16,000 residents
RAF Brize Norton is located on the southern edge of Carterton. In 2010, the government published the Strategic Defence and Security Review (SDSR) which set out a broad route map for military policy.

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This is important in relation to land at Carterton because:

- this economic growth post-dates the 2011 Census - which is the source of data that West Oxfordshire District Council has used to estimate the number of jobs at RAF Brize Norton and the consequences for housing allocations;
- it suggests that future jobs growth - some of it in sophisticated defence-related activities - is very probable on site; and
- it infers that defence-related activities - some of which are highly sophisticated and knowledge intensive - could be a growing feature of West Oxfordshire’s economy, an observation that was also made by West Oxfordshire District Council in its recent comments on the consultation draft of the revised Strategic Economic Plan for Oxfordshire.

Oxfordshire is an economic driver which is of national significance, particularly given wider geopolitical and macroeconomic uncertainties. To realise this potential, central government is investing in infrastructure but it recognises that there are major issues that need to be addressed locally, notably in relation to housing supply.

In the vicinity of Carterton, local jobs growth is probable given the expansion of RAF Brize Norton and the implementation of Programme Gateway. Some of these jobs are likely to be “knowledge rich” with a high engineering content and consistent with wider local ambitions surrounding the quality of economic growth.

Recent jobs growth (since the 2011 Census) linked to changes at RAF Brize Norton has not been taken into account by West Oxfordshire District Council in determining housing land allocations in the vicinity of Carterton. Since 2011 there have been an additional 2,500 jobs created at RAF Brize Norton with Carterton being identified as a main area for service men and women to live. Economic activity is high within Carterton and the town has a vital role within the District as a whole. Whilst there has been provision for additional employment within Carterton in the Proposed Modifications, it is noteworthy that the WODC Economic Snapshot report January 2015 states that:

"One area that needs further investigation is the potential impact of increased activity at Brize Norton. The likelihood and quantum of this are not known at this stage, but there is the potential for a significant impact on the Carterton and Witney markets."
We are surprised that this further investigation into economic benefits was not undertaken during the adjournment of the EIP.

Oxfordshire County Council (OCC) have aspirations to improve the access to and from Carterton to the A40 which would enhance the attractiveness as an employment destination and further enhance Carterton’s MSC status. This is also reflected in the vision from Oxfordshire Local Enterprise Partnership (Oxfordshire LEP) that such improvements would attract inward investment and support economic regeneration and environmental enhancements to Carterton which will strengthen the longer term role of the town.

It is considered that the Council has overlooked the economic potential of Carterton and the importance of additional housing allocations to the north of the town which would enable the delivery of wider infrastructure improvements as well as enabling the proportionate growth within Carterton in accordance with the Council’s spatial strategy. The WODC Economic Snapshot report January 2015 concludes that:

"The Local Plan may also apply a more specific spatial focus along the lines set out in this report directing activity to a growth funnel running from Carterton to the Oxford City fringe."

And

"We recommend that Carterton is made a priority area for economic regeneration and that infrastructure provision is focussed on the A40 Corridor."

The WODC Economic Snapshot Addendum report (April 2015) confirms that:

"Figure 2.15 from the West Oxfordshire Economic Snapshot report shows the share of Employment and Economically Active Workers in the District by Sub Area. This graph shows a significant excess of economically active workers over jobs for Carterton. The data for jobs and workers are taken from different data sources and as noted in subsequent paragraphs the employment figures for Carterton 'may not reflect the full extent of MoD activity in the sub area'. Using workplace employment data from the Census we are able to provide a comparison which does include HM Forces employment at Carterton as recorded by the Census.

Reproducing Figure 2.15 using Census Workplace data for employment instead of the BRES data used in the original report shows a larger share of the district’s jobs as being located in Carterton at 21.3/o compared to 24.0/o of the district’s economically active residents who live in the Carterton sub area."

We strongly contest the conclusions drawn from Figure 2.15 because, whilst they now update BRES data (which excludes military personnel) by using Census data, the Census Date (March 2011 precedes the 2,500 Lyneham jobs that began to move to RAF Brize Norton from July 2011 onwards.

Our client, Bloombridge, set this out for WODC in the agreed Statement of Common Ground, where this omission was accepted, yet the Main Modifications have not sought to address the spatial consequences; in particular, a proportionate increase in housing numbers for Carterton.

Sub-Areas
We question the rationale behind the overall allocations as there has been a reduction in percentage overall for the MSC’s that are Witney, Carterton and Chipping Norton (77% reduced to 71%) whilst there have been sizeable increases to highly constrained areas namely Burford and Charlbury which is an Area of Outstanding Natural Beauty (AONB) and Woodstock which impacts on the setting of a World Heritage Site. In the Milton-under-Wychwood appeal decision the Inspector’s report summarised that:

“Almost all of the Burford-Charlbury Sub Area is within the CAONB [Cotswold AONB] and the Council accepts that there is no scope for meeting the emerging LP requirement for the construction 800 dwellings in the sub-area on sites outside the CAONB. In this regard it is worth noting that in a recent 'call for 'sites” process only one in the sub-area is outside the CAONB.”

Yet the Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 25% from 800 to 1,000 homes. Paragraphs 115 and 116 of the NPPF clearly states that great weight should be given to conserving landscape and scenic beauty in AONBs and exceptional circumstances must be demonstrated to justify allowing major development. Paragraph 116 states that consideration of such applications should include an assessment of the need for the development and its impact on the local economy, the cost of, and scope for, developing elsewhere outside the designated area (e.g. in the Carterton Sub-Area), or meeting the need for it in some other way, and any detrimental effect on the environment and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area: however, that is not a reason to increase housing within the sub area, especially when Carterton is unconstrained and where there is a clear ‘needs’ case for development.

We are instructed on behalf of our clients, David Wilson Homes Southern (DWH) and Bloombridge Development Partners, to submit representations to the West Oxfordshire District Council (“WODC”) consultation on the Proposed Main Modifications for the submission Local Plan 2031. In summary, we consider:

1. WODC still has not addressed the full OAN - 688 dpa. Unmet need to date (shortfall) is a particular problem - 1,836 homes. It is counter intuitive for the Council to hold the view that the present day need for housing should be addressed in 5 years’ time or beyond.

2. The sites proposed by the Main Modifications are not justified by the evidence and they are not reasonable or deliverable alternatives in comparison to the housing and economic potential of Carterton, West Oxfordshire’s second largest settlement and home to RAF Brize Norton, the so called ‘Superbase’.

3. Carterton is relatively unconstrained and, as set out in the Carterton Town Master Plan, it is a settlement in West Oxfordshire where further development will be particularly and plainly beneficial - to help regenerate the town centre and make the most of RAF Brize Norton as an economic asset. The town is not subject to any specific policies that would indicate that development should be restricted (NPPF, paragraph 14, Footnote 9) and, helpfully, Carterton is one of the most affordable housing markets in the County, thereby widening the accessibility of home ownership.

It is odd that WODC has not addressed the potential of Carterton. Even with the adjournment of the EIP in November 2015, there has been no engagement with our clients to understand the potential of a ‘North
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Carterton’ strategic allocation, despite representations and the submission of a series of master plan proposals over the last five years.

The Town Council published the Carterton Town Master Plan in April 2015 and, responding to that, David Wilson Homes and Bloombridge have now joined forces to deliver development in a series of phases which, crucially, also addresses the needs of the town (regeneration) and surrounding parishes (green buffers and an extended country park) in a sustainable way.

Two sites are being promoted as detailed below, and which have been subject to previous representations to the Submission Draft Local Plan made separately on behalf of each client:

Land North of Swinbrook Park, Carterton

David Wilson Homes Southern are promoting land for 115 homes with public open space and affordable units provided onsite. The scheme, master planned and assessed in detail, also provides a significant area of land to form an extension to the Kilkenny Country Park as well as significant landscape enhancements particularly adjacent to Shilton Road. DWH own and control the land in its entirety and are able to deliver housing now, subject to the grant of planning permission, and complete prior to 2021.

Land North of Carterton, Kilkenny Farm

Bloombridge Development Partners are jointly promoting land at Kilkenny Farm with David Wilson Homes Southern, having recently entered into a formal joint venture. The land comprises 250 acres (100 Hectares), it is held under a long term option, and runs contiguous with the proposals for Swinbrook Park. The Kirkham Landscape Appraisal (2012), the Council’s own evidence, identified this land as being capable of accommodating up to 750 homes below the 110m contour. No further land assembly is required.

We support the promotion of a sustainable master plan for up to 750 homes at Kilkenny Farm. As part of this proposal an initial phase of 300 homes is capable of being delivered in the first five years of the plan, subject to allocation and the grant of planning permission, to meet unmet housing need without harm to the character of its context. This is consistent with the Carterton Town Master Plan.

In terms of effectiveness of this proposal, David Wilson Homes have delivered more houses in Carterton than any other housebuilder (in excess of 1,200) and, as a company, delivered 17,319 across the country last financial year.

These representations are made in response to the West Oxfordshire Local Plan 2031 SUBMISSION DRAFT INCLUDING PROPOSED MODIFICATIONS November 2016 and should be read in addition to the previous representations made as part of the Local Plan process.

Duty to Cooperate

With respect to cooperation with other authorities in the HMA, whilst West Oxfordshire appears to have addressed the attribution of unmet need by accepting an additional 2,750 homes at Eynsham, the Council will need to publish evidence in response to the Proposed Modifications to demonstrate that WODC has engaged with its neighbours to consider the implications for the continuing validity of the SHMA’s recommendations for the other authorities and whether the 660 homes per annum is accepted as an effective response by neighbouring authorities. The latest Annual Monitoring Report confirms that in his preliminary findings on the Local Plan the Inspector was able to conclude that the Council had fulfilled the duty to co-operate. Further consideration will be given to cross-boundary matters of strategic importance when the Local Plan examination resumes in December 2016 and the Council’s duty to co-operate statement will be updated accordingly.
Whilst the 2,750 homes proposed at Eynsham are derived from the deliberations of the Oxfordshire Growth Board and how the 15,000 assessed un-met housing needs of Oxford City would be split between the Oxfordshire districts, it is recognised that South Oxfordshire did not agree. Therefore West Oxfordshire will need to demonstrate that there is agreement with the other authorities in Oxfordshire that 2,750 homes is their contribution towards addressing the City’s un-met housing needs.

Context

Carterton has been identified as a Main Service Centre (MSC) within West Oxfordshire’s Local Plan 2031 Settlement Hierarchy (Table 4.1) of which a significant proportion of future development should be steered. The vision for Carterton is very much to strengthen its role as this MSC proportionately and seeks both housing, business developments and associated infrastructure alike.

Spatial Strategy

The Council’s Spatial Strategy as envisaged through the Main Modification is fundamentally flawed as it fails to spatially recognise the importance of supporting the role of Carterton through not only the under provision of housing, but also the proposed allocation of what is considered to represent a reliance on undeliverable sites. We argue that not enough consideration has been given to the role and prominence of Carterton as a Main Service Centre and in general within the District the proposed allocations have been distributed widely and without sufficient regard to the spatial strategy which had been assessed through the Sustainability Appraisal.

We are also concerned that the potential job growth associated with the relocation of services from RAF Lyneham to RAF Brize Norton has not been captured in the baseline economic forecasting, and this significant above trend job increase may lead to a further increase in housing requirement in West Oxfordshire or as a minimum require a refocussed distribution of housing to Carterton. The 2,500 jobs from RAF Lyneham, given the move commenced in July 2011, clearly were not captured in the Census, given the Census Date is March 2011. It is considered that Carterton has a vital role within the District and is capable of accommodating significant growth to the north of the town without changing its intrinsic character.

There has not been sufficient regard to Carterton Town Council’s Masterplan and their Spatial Strategy which seeks development to the north of Carterton, providing significant employment provision, new facilities, infrastructure and a Country Park extension. Fundamentally, the Plan should not be putting forward sites which are questionable in terms of delivery, especially when these sites are not consistent with the Council’s spatial strategy (i.e. Carterton before the smaller, more constrained settlements).

Housing Need and Affordability

The plan is considered not to suitably address housing need despite the uplift in numbers. There has been insufficient development in the first five years (up to 2016) which is further increasing unmet need. The Council assert that the residual Liverpool method is most appropriate to address the 1,836- dwelling backlog (excluding Oxford City unmet need) from 2011-2016 rather than Sedgefield which is recognised in Planning Practice Guidance (PPG).

However, in an appeal decision dated 25th July, 2016 at Milton-under-Wychwood1, the Inspector concluded that “Housing land supply in the District is less than 2 years. Such a shortfall must be regarded to be severe.” Furthermore, in an appeal decision on 15th May, 2016 at Eynsham2, the
Inspector acknowledged (paragraph 56) that whilst a 5% buffer was appropriate at that time, "if delivery continues to be below that which is required, future decision makers may take a different view as regards the appropriate buffer to apply". Since the Main modifications have amended the target, it would be appropriate to reassess if a 20% buffer should now be applied.

Alongside this context of a severe shortfall in housing delivery, the report of the Oxfordshire Growth Board Post SHMA Strategic Work Programme report3 states that:

"133) The Programme is not seeking to allocate or release sites, but has at a high level and using a common basis, through the work streams; identify the evidence of each district’s ability to absorb additional growth to meet a share of Oxford’s unmet need. It will be for each of the districts through their normal Local Plan processes to allocate sites sufficient to meet their proposed share of Oxford’s unmet need under the requirements of the Duty to Co-operate.

134) It is also important to note that the yield figures for each area of search represent estimated housing numbers to be delivered by 2031 - total capacities at a number of these sites may change through local assessment as part of the more detailed Local Plan process, taking a wider range of planning factors into account, including the potential to deliver further housing beyond 2031."

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The potential significance of land at Carterton - a settlement in West Oxfordshire with around 16,000 residents - needs to be understood in this context, and from two perspectives.

RAF Brize Norton is located on the southern edge of Carterton. In 2010, the government published the Strategic Defence and Security Review (SDSR) which set out a broad route map for military policy. In a report written by SQW in 2011, the likelihood of growth at RAF Brize Norton (and closures elsewhere) was anticipated. Subsequently, this expectation has been (and is being) realised - including through the relocation of the Hercules Force from RAF Lyneham. Currently, RAF Brize Norton is the largest station in the Royal Air Force, referred to as a ‘Superbase’ (and probably West Oxfordshire’s largest, single economic asset).

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• this economic growth post-dates the 2011 Census - which is the source of data that West Oxfordshire District Council has used to estimate the number of jobs at RAF Brize Norton and the consequences for housing allocations;

• it suggests that future jobs growth - some of it in sophisticated defence-related activities - is very probable on site; and

• it infers that defence-related activities - some of which are highly sophisticated and knowledge intensive - could be a growing feature of West Oxfordshire’s economy, an observation that was also made by West Oxfordshire District Council in its recent comments on the consultation draft of the revised Strategic Economic Plan for Oxfordshire.

Oxfordshire is an economic driver which is of national significance, particularly given wider geopolitical and macroeconomic uncertainties. To realise this potential, central government is investing in infrastructure but it recognises that there are major issues that need to be addressed locally, notably in relation to housing supply.

In the vicinity of Carterton, local jobs growth is probable given the expansion of RAF Brize Norton and the implementation of Programme Gateway. Some of these jobs are likely to be "knowledge rich" with a high engineering content and consistent with wider local ambitions surrounding the quality of economic growth.

Recent jobs growth (since the 2011 Census) linked to changes at RAF Brize Norton has not been taken into account by West Oxfordshire District Council in determining housing land allocations in the vicinity of Carterton. Since 2011 there have been an additional 2,500 jobs created at RAF Brize Norton with Carterton being identified as a main area for service men and women to live. Economic activity is high within Carterton and the town has a vital role within the District as a whole. Whilst there has been provision for additional employment within Carterton in the Proposed Modifications, it is noteworthy that the WODC Economic Snapshot report January 2015 states that:

"One area that needs further investigation is the potential impact of increased activity at Brize Norton. The likelihood and quantum of this are not known at this stage, but there is the potential for a significant impact on the Carterton and Witney markets."

We are surprised that this further investigation into economic benefits was not undertaken during the adjournment of the EIP.

Oxfordshire County Council (OCC) have aspirations to improve the access to and from Carterton to the A40 which would enhance the attractiveness as an employment destination and further enhance Carterton’s MSC status. This is also reflected in the vision from Oxfordshire Local Enterprise Partnership (Oxfordshire LEP) that such improvements would attract inward investment and support economic regeneration and environmental enhancements to Carterton which will strengthen the long term role of the town.

It is considered that the Council has overlooked the economic potential of Carterton and the importance of additional housing allocations to the north of the town which would enable the delivery of wider infrastructure improvements as well as enabling the proportionate growth within Carterton in accordance with the Council’s spatial strategy. The WODC Economic Snapshot report January 2015 concludes that:

"The Local Plan may also apply a more specific spatial focus along the lines set out in this report directing activity to a growth funnel running from Carterton to the Oxford City fringe."
And

"We recommend that Carterton is made a priority area for economic regeneration and that infrastructure provision is focused on the A40 Corridor."

The WODC Economic Snapshot Addendum report (April 2015) confirms that:

"Figure 2.15 from the West Oxfordshire Economic Snapshot report shows the share of Employment and Economically Active Workers in the District by Sub Area. This graph shows significant excess of economically active workers over jobs for Carterton. The data for jobs and workers are taken from different data sources and as noted in subsequent paragraphs the employment figures for Carterton 'may not reflect the full extent of MoD activity in the sub area'.

Using workplace employment data from the Census we are able to provide a comparison which does include HM Forces employment at Carterton as recorded by the Census.

Reproducing Figure 2.15 using Census Workplace data for employment instead of the BRES data used in the original report shows a larger share of the district’s jobs as being located in Carterton at 21.3% compared to 24.0% of the district’s economically active residents who live in the Carterton sub area."

We strongly contest the conclusions drawn from Figure 2.15 because, whilst they now update BRES data (which excludes military personnel) by using Census data, the Census Date (March 2011) precedes the 2,500 Lyneham jobs that began to move to RAF Brize Norton from July 2011 onwards. Our client, Bloombridge, set this out for WODC in the agreed Statement of Common Ground, where this omission was accepted, yet the Main Modifications have not sought to address the spatial consequences; in particular, a proportionate increase in housing numbers for Carterton.

Sub-Areas

We question the rationale behind the overall allocations as there has been a reduction in percentage overall for the MSC’s that are Witney, Carterton and Chipping Norton (77% reduced to 71%) whilst there have been sizeable increases to highly constrained areas namely Burford and Charlbury which is an Area of Outstanding Natural Beauty (AONB) and Woodstock which impacts on the setting of a World Heritage Site. In the Milton-under-Wychwood appeal decision the Inspector’s report summarised that:

"Almost all of the Burford-Charlbury Sub Area is within the CAONB [Cotswold AONB] and the Council accepts that there is no scope for meeting the emerging LP requirement for the construction 800 dwellings in the sub-area on sites outside the CAONB. In this regard it is worth noting that in a recent ‘call for sites’ process only one in the sub-area is outside the CAONB."

Yet the Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 25% from 800 to 1,000 homes. Paragraphs 115 and 116 of the NPPF clearly states that great weight should be given to conserving landscape and scenic beauty in AONBs and exceptional circumstances must be demonstrated to justify allowing major development. Paragraph 116 states that consideration of such applications should include an assessment of the need for the development and its impact on the local economy, the cost of, and scope for, developing elsewhere outside the designated area (e.g. in the Carterton Sub-Area), or meeting the need for it in some other way, and any detrimental effect on the environment and
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<tr>
<td>MM754</td>
<td>Persimmon Homes Wessex</td>
<td>Claire Hambleton</td>
<td>Ms</td>
<td>Hambleton</td>
<td>1888</td>
<td>&gt; General Comments</td>
<td>the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area; however, that is not a reason to increase housing within the sub area, especially when Carterton is unconstrained and where there is a clear 'needs' case for development.</td>
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<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
<td>-</td>
<td>Cantay Estates</td>
<td>1905</td>
<td>&gt; General Comments</td>
<td>This submission is in response to the Main Modifications to the West Oxfordshire Local Plan 2031. Through previous representations to the Council the Consortium has questioned the plan's ability to adequately demonstrate a five year housing land supply and the ability of the plan to deliver the Council's Objectively Assessed Housing Need over the plan period.</td>
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Since the draft West Oxfordshire Local Plan 2031 was submitted to Government in July 2015 and considered at examination in November 2015. In the Inspector’s preliminary findings published in December 2015 he raised a number of concerns primarily regarding the proposed housing requirement which he felt was too low and not justified. He also expressed concerns that the plan took no account of any additional ‘unmet’ housing need arising from Oxford City. The examination was suspended in January 2016. The Council has now prepared a list of modifications which seek to make the plan sound. We recognise that the Council has undertaken a large amount of work in order to address the Inspector’s concerns and whilst we support some of the changes we still have concerns regarding the soundness of the plan. 

The National Planning Policy framework sets out how a Local Plan should be developed in order to be justified, effective, consistent with national policy and positively prepared to deliver sustainable development that meets local needs and national priorities (NPPG, Paragraph: 001 Reference ID: 12-001-20140306).

In our view, we believe that the plan is not effective and not consistent with National Policy. It is evident that the Local Plan will not provide a sufficient supply of deliverable and developable housing land supply to produce a five year supply of housing. It is also noteworthy that in a number of instances the Local Plan is inconsistent with Government Policy, the requirements of National Planning Policy Framework and Planning Practice Guidance. |

We consider the Local Plan as proposed to be modified to be unsound. The plan proposed now includes new strategic areas which were previously only considered suitable for limited development; other settlements previously considered important in supporting the rural district have their status downgraded. 

The proposed changes are so fundamental that the modified document amounts to a new planning strategy, not a mere modification of the submitted plan. The fundamentally different approach must be informed by proper consultation, informed by a robust evidence base and compliant with the National Planning Policy Framework. We do not consider the proposed modifications to fulfil any of these criteria. 

The new plan should have been built from the 'issues and options' stage in order to allow communities and stakeholders proper input to the plan making process. Even the limited consultation undertaken at this stage is inadequate as fundamental supporting documents were not available for inspection for much of its duration. 

The proposed modifications cannot be sound as they are not justified by robust evidence. The submitted Sustainability Appraisal did not previously take account of the development options now proposed as they were considered unreasonable. 

The inclusion of housing to serve an area not previously considered and substantially increased levels of proposed housing mean a fresh SA is required, not merely an addendum to the previous appraisal. The |
addendum itself is also deficient as it only considers the impacts of the proposed modifications against the SA objectives, no reasonable alternatives are included for comparative assessment.

The absence of a robust justification also undermines the deliverability of the proposed strategic development areas at Eynsham. There is a good deal of uncertainty with fundamental development decisions deferred to an Area Action Plan.

The absence of a clear strategy for such a significant development means the plan cannot be considered effective.

Proposed modifications also indicate the new strategic developments require the downgrading of Long Hanborough from a service centre, seemingly as the Council seeks to avoid an 'oversupply' of services and facilities in the area. We consider the stifling of an existing rural community is contrary to the aims of the NPPF and the overall principles of the emerging plan, including aspirations to enhance sustainable transport links.

1. The Sustainability Appraisal: The Submission Local Plan made provision for the development of 10,500 new homes between 2011 and 2031, amounting to 525 units per year. The plan sought to address only the housing need arising in the district of West Oxfordshire, no housing was proposed to meet Oxford’s unmet housing needs with this issue being deferred to a later, following plan.

2. Modifications now proposed to the plan increase the proposed housing provision to 15,950. This requirement consists of 13,200 homes, equating to 660 per annum, to address the district’s own need; a further 2,750 homes are introduced to serve Oxford’s unmet need.

3. It is relevant to note there has been a significant under supply of homes in the initial part of the plan period. As a result an additional 1,836 homes are required to be delivered on top of the 660 per annum rate to address this in the remaining plan period.

4. The revised housing provision is some 5,450 higher but remains to be delivered over the same plan period. In order to address the significant increased housing provision and accommodate the housing needs of an area not previously considered (Oxford City) the proposed modifications introduce ‘Strategic Development Areas’; this represents a fundamental deviation from the spatial strategy previously proposed.

5. This is the first time a development strategy involving a new settlement has been subject to SA as the option was ‘scoped out’ in the preliminary stages of the submitted appraisal as it was not considered to represent a ‘reasonable option’. As a result the development plan as submitted did not take any account of potential impacts (positive or negative) of a strategic development area.

6. At the same time modifications now proposed suggest downgrading existing settlements from their roles as ‘service centres’; a change in stance which seeks to restrict development. This change in approach is a fundamental change from the submission plan which sought to stimulate sustainable growth to maintain and enhance these settlements as vibrant communities and facility hubs for surrounding areas.

7. The proposed modifications amount to a significant change to the proposed plan both in the overall quantum of proposed development and the spatial approach. Despite this the changes are dealt with in the SA as an “addendum” rather than consideration being given to the most appropriate spatial distribution of housing. The modifications are merely additions to a predetermined strategy, rather than an informed choice for the most sustainable development following examination of all reasonable alternatives. We believe the SA
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8. Even if it were appropriate to consider the modifications through an SA addendum we believe the addendum itself to be deficient. The Inspector confirmed in his Interim Findings (INO16) that any new site allocation must be informed by Sustainability Appraisal including assessment against reasonable alternatives.

9. With regard to new strategic development areas the published SA addendum solely considers two sites adjoining Eynsham, rather than seeking to compare any reasonable alternatives. Those sites closer to Oxford were dismissed out of hand due to Green Belt constraints, while those to the west were dismissed as being too distant from the city.

10. The purpose of the SA is to enable a transparent and balanced assessment of alternative options against sustainability criteria, allowing a judgement to be made. For example a site closer to Oxford would benefit from physical proximity, but present challenges with regard to green belt impacts; a proper SA allows a balanced judgement to be made on the various impacts to allow transparency in decision making.

Similarly the SA addendum is restricted in its assessment of non-strategic allocations as it solely considers the impacts of the sites proposed for allocation rather than their relative performance against reasonable alternative unallocated sites. Without alternatives being considered the SA is flawed and the main modifications to the draft Local Plan based on the SA should not proceed without further SA analysis.

12. The SA addendum suggests alternative sites have not been assessed as the proposed submissions are the only suitable development sites identified in the SHELAA. We have identified shortcomings in the SHELAA (discussion follows), however even if this were to be a robust document it only forms part of the evidence base. The SA allows assessment of the relative performance of sites to identify particular benefits as well as harm. It should therefore include all reasonable sites to ensure the best are selected.

13. The SA does not consider all reasonable alternative options, merely the impacts of the Council’s pre-selected options. This approach pre-judges the outcomes of the SA, removes the robustness and transparency of the plan making process and results in an unsound Plan.

14. Evidence base for proposed modifications: The proposed modifications must be informed by a robust and comprehensive evidence base.

15. The proposed modifications to the plan claim to be informed by an updated SHELAA; however this document was not published until 9th December 2016 four weeks into the six week consultation period. The sequence of publication suggests the evidence has been tailored to fit the plan, rather than informing the Council’s selection of the most sustainable options.

16. It is clearly not acceptable that this consultation has allowed only a fortnight for inspection of the modifications and evidence base. The SHELAA is fundamental to understanding the soundness of the proposed changes, particularly as the document which accompanied the submitted plan was identified as deficient by the Inspector in his interim findings (INO16).

17. Failure to undertake proper consultation at this stage leaves any decision upon the plan vulnerable to legal challenge as the plan making process, including consultations have not adhered to proper process.

18. The limited assessment which it has been possible to undertake of the SHELAA suggests it has been treated
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<tr>
<td>MM767</td>
<td>Blue Cedar Homes</td>
<td>Simon Tofts</td>
<td>Mr</td>
<td>Tofts</td>
<td>2006</td>
<td>&gt; General Comments</td>
<td>As a general point, the recognition by the Authority of providing homes to meet the needs of older people through the Draft Plan is very much welcome and encouraging to see.</td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2179</td>
<td>&gt; General Comments</td>
<td>The County Council welcomes the opportunity to comment on West Oxfordshire District Council's Submission Local Plan Proposed Modifications. The County Council overall supports the preparation of the Plan which addresses the need for increased housing growth to meet the objectively assessed housing need for West Oxfordshire as well as a proportion of Oxford's unmet housing need. The County is pleased to see proposed growth in the larger towns within the district such as at Witney and Chipping Norton and is supportive of housing allocations in Eynsham all of which will assist in delivering a step change in infrastructure in key locations. However, it is noted that there is no significant new housing growth allocated at Carterton which is one of the 3 largest towns within the district. As the Plan includes a significant proportion of unallocated housing sites, the County anticipates working closely with West Oxfordshire to identify housing and employment locations, especially in the Carterton sub area, through the Local Plan Part 2 process. This will not only bring certainty in the deliverability of housing over the Plan period but also assist in overcoming the infrastructure challenges that Carterton faces. The main issue for the County Council is the identification, provision, funding and overall deliverability of the infrastructure and services needed to support the level of growth within the Plan, in particular with regard to transport and education infrastructure. It is therefore imperative that both councils work together to identify the infrastructure requirements of the large strategic housing allocations and also the small, cumulative apportionments within the plan. Oxfordshire County Council supports in principle the main modifications to the plan which increase the overall housing provision to meet in full the district's objectively assessed housing need as identified in the Oxfordshire SHMA 2014 and which is based on supporting economic growth. This is in line with government objectives to substantially boost the supply of housing and local objectives of the Strategic Economic Plan and the City Deal. Overall Housing Number in the Plan</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2285</td>
<td>&gt; General Comments</td>
<td>Oxfordshire County Council (OCC) supports the Proposed Modifications and the provision of at least 15,950 homes in the period 2011-31, which includes 13,200 to meet the district’s needs and 2,750 homes as West Oxfordshire’s contribution to providing for Oxford’s unmet housing need. The inclusion of 2,750 homes for Oxford’s unmet need is in line with the Growth Board’s apportionment of unmet need and reflects the terms of the Growth Board Memorandum of Cooperation signed by five of the Oxfordshire councils including West Oxfordshire and the County Council. The figure has been tested at a high level through the post SHMA process and shown to be deliverable. Timely provision of infrastructure OCC supports the emphasis on the importance of timely delivery of supporting infrastructure. The local plan should give confidence that infrastructure, particularly critical strategic infrastructure, will be provided when needed. The County Council will work with WODC to ensure that the CL 123 list and IDP list identifies necessary infrastructure and its phasing. The County Council has experienced significant difficulties in securing appropriate mitigation measures for the impact of strategic development areas where portions of the site have come forward as separate planning applications. To help reduce the occurrence of this issue we suggest the inclusion of a policy within the Plan for proposals for sites to be brought forward by means of a single planning application. This will help to achieve comprehensive developments and ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion. Education 31. The proposed scale of development at Burford would be expected to exceed the current primary school’s capacity, and this school may be challenging to expand due to site constraints. The proposed scale of development at Charlbury would be expected to exceed the current primary school’s capacity, and expansion of the school will be needed to meet this and other developments already permitted. Despite an increase in the overall housing requirement to 15,950 homes entailing the increase in size of a number of existing strategic sites and the allocation of 15 new sites the 2031 Local Plan does not require/encourage developers to carry out any Health Impact Assessments. To understand and take account of the health status and needs of the local population including expected future changes, and any information about relevant barriers to improving health and well-being it is strongly recommended that a provision is included within the 2031 Local Plan requiring developers to carry out a Health Impact Assessment as part of the master planning process for all strategic sites.</td>
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<td>MM791</td>
<td>Greenwich Lane Owners</td>
<td>Greenwich Lane Owners</td>
<td>-</td>
<td>Greenwich Lane Owners</td>
<td>2315</td>
<td>&gt; General Comments</td>
<td>1. The Sustainability Appraisal: The appraisal makes clear that the Submission Local Plan only included a proposed housing requirement of 10,500 homes between 2011 and 2031, amounting to 525 new units per year. The plan sought to address only the housing need arising in the district of West Oxfordshire, whilst acknowledged as a likely requirement the document sought to defer any portion of Oxford City’s unmet need to a following Local Plan part 2. 2. In issuing his initial findings the Inspector confirmed that the plan as submitted was unsound as it failed to address the objectively assessed housing need; the Council now seeks to address this. Modifications now proposed to the Plan increase housing provision to 15,950 units across the plan period. This consists of 13,200 homes (660 per annum) to address the district’s own need with a further 2,750 homes to serve Oxford’s unmet need.</td>
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3. The revised housing provision is some 5,450 units higher and remains to be delivered over the same plan period. In order to meet the significant increased figure, including homes to serve an area not previously considered, 'Strategic Development Areas' are now proposed. The introduction of these substantial new sites in an area previously proposed for only limited development is a considerable deviation from the spatial strategy of the submission plan proposed.

4. This is the first time a development strategy involving a new settlement has been subject to SA; the option was 'scoped out' of the previous assessment as it was not considered to represent a reasonable option. As a result the development Plan originally submitted for examination did not take account of potential impacts of a strategic development area.

5. The proposed modifications amount to a distinctly different plan to that submitted for examination both in the level of development and the spatial approach. Despite this the changes are dealt with in the SA as an "addendum", rather than fresh consideration being given to the most appropriate spatial distribution of housing. The modifications are merely 'bolts-on' to a predetermined strategy, rather than an informed choice for the most sustainable development following examination of all reasonable alternatives. We believe the SA to be deficient, therefore the Plan which follows from it cannot be sound.

6. Even if it were appropriate to consider the modifications through an SA addendum we believe the addendum itself to be deficient. The Inspector confirmed in his Interim Findings (INO16) that any new site allocation must be informed by Sustainability Appraisal including assessment against reasonable alternatives.

7. The published SA addendum solely considers two new strategic development sites adjoining Eynsham, rather than seeking to compare any reasonable alternatives. Those sites closer to Oxford were dismissed out of hand due to Green Belt constraints, while those to the west were dismissed as being too distant from the city.

8. The purpose of the SA is to enable a transparent and balanced assessment of alternative options against sustainability criteria, allowing a judgement to be made. For example a site closer to Oxford would benefit from physical proximity, but present challenges with regard to green belt impacts; a proper SA allows a balanced judgement to be made on the various impacts to allow a transparency in decisions.

9. The SA does not consider all reasonable alternative options, merely the impacts of the Council's pre-selected options. This approach pre-judges the outcomes of the SA, removes the robustness and transparency of the plan making process and results in an unsound Plan.

10. Evidence base for proposed modifications: The proposed modifications must be informed by a robust and comprehensive evidence base.

11. The proposed modifications to the plan claim to be informed by an updated SHELAA; however this document was not published until 9th December 2016 four weeks into the six week consultation period. The sequence of publication suggests the evidence has been tailored to fit the plan, rather than informing the Council's selection of the most sustainable options.
12. It is clearly unacceptable that this consultation has allowed only a fortnight for inspection of the modifications and evidence base. The SHELAA is fundamental to understanding the soundness of the proposed changes, particularly as the document which accompanied the submitted plan was identified as deficient by the Inspector in his interim findings (INO16).

13. Failure to undertake proper consultation at this stage leaves any decision upon the plan vulnerable to legal challenge as the plan making process, including consultations have not adhered to proper process.

14. The limited assessment which it has been possible to undertake of the SHELAA suggests it has been treated as a means to limit development in the district, rather than explore the theoretical capacity of suitable development sites.

15. Numerous sites, including our client’s land in Leafield (ref 409) are incorrectly classed as unsuitable for development as surmountable constraints are treated as barriers to development.

16. For example site 409 (Land off Greenwich Lane, Leafield) is considered unsuitable for development owing to landscape impacts, this conclusion does not align with the detailed comments which suggest a scheme can be accommodated, subject to suitable landscaping. The site is also discounted on the basis of vehicular access issues; this is despite no exploration of highway upgrades or mitigations to ‘unlock’ the site.

17. The restrictive approach applied through the SHELAA means it does not fulfil the purpose of the evidence document. It fails to provide the ‘menu of sites’ for assessment to ensure the most appropriate are chosen. This issue was identified by the Inspector in his initial findings (INO16) and does not appear to have been satisfactorily addressed; as a consequence the foundations do not exist upon which the Council can build a sound development plan.

MM152

Amy Jackson
Miss Jackson 334

- I am very supportive of new housing developments when appropriately designed and located, and contain significant provision for ongoing affordable housing. The proposal for the Garden Village at Eynsham appears at face value to provide this so in principle it would have my support.

- However, I am concerned that the affordable housing element must include houses available for both purchase and rent, and that those sold must have part ownership sustained so that they continue to provide support for those starting out on the housing ladder rather than getting exploited by those looking to push the housing from affordable to mainstream.

- The transport provision in the local plan is all focused on the Garden Village and how people will get from there to Oxford and the station at Hanborough. However, the existing transport provision in Freeland and the Hanboroughs is woeful, especially since bus services were more than halved recently. I had to give an elderly disabled man a lift to Woodstock the other day because I couldn’t bear watching him standing with his two sticks for almost 25 minutes at a bus stop in Hanborough waiting for a bus. These significant housing developments should be used as an opportunity to address the serious transportation needs across villages in the immediate area that would help make sure young and elderly people can continue living in our villages.

- I also have concerns about how far the Garden Village will spread – in the West Oxon expression of interest chapter 4.2, clear reference is made to the Garden village being developed further past the initial 2,200 houses. The villages in W Oxon need to retain their village character so meaningful green space is needed between each settlement. The Garden Village is currently proposed over 166ha and 2,200 houses, yet an area of nearer 320ha has been alluded to in the expression of interest, and nearer 3,500 houses, which takes the
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<td>MM155</td>
<td></td>
<td>Christopher Brooks</td>
<td>Mr</td>
<td>Brooks</td>
<td>337</td>
<td>&gt; General Comments</td>
<td>Objection to the further development being proposed along the A361 Burford Rd, which is an AONB.</td>
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<td>MM158</td>
<td></td>
<td>Dominic Cavendish</td>
<td>Mr</td>
<td>Cavendish</td>
<td>347</td>
<td>&gt; General Comments</td>
<td>Owing to lack of time and the complexity of the development proposals regarding Chipping Norton I cannot attach a completed Local Plan 2031 response form. But I wish to register in the strongest terms my dismay and indignation at the way this process is being conducted 1) &quot;Please Return to West Oxfordshire District Council by 5pm, Friday 23 December 2016&quot; - in other words, before most tax-paying residents will have a decent period of respite from their working lives to consider the proposals/amendments. Which in itself strikes me as undemocratic. 2) The relevant section of the West Oxfordshire District Council website is at least five sections removed from the home-page; meaning only those completely conversant with the way that website works will be likely able to persevere and locate the form. Which in itself strikes me as undemocratic. 3) The wording/formulation of the response form requires the sort of expertise in council planning matters from those objecting that most people don't have. Which in itself strikes me as undemocratic. 4) It is unclear how residents of Chipping Norton can, in simple layman's terms, register their alarm or concern about the scale of house-building proposed for their town. Which in itself strikes me as undemocratic. 5) I can't find no mechanism by which members of the public can query why other options have not been considered or explored before house-building takes place on a character-altering scale to small towns outside Oxford - let alone make proposals of their own. For instance, why is the prime land occupied by Oxford Airport not being considered as an alternative development site for housing, given its proximity to the city and the airport’s relative lack of civic usefulness to the county? Just one example you’d expect to see explored in a debate/consultation. In short, in my view, not only are the proposals for Chipping Norton that I have seen aired at public meetings ill-suited to the town and poorly thought-through but the very approach by which the public is being consulted and offered the chance to input its views is itself ill-suited to the subject and poorly thought-through.</td>
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It’s this kind of democratic deficit that gives politics, and planning, a bad name.

I recognise that as a team you have some very difficult decisions to make with regards to the pressure that Central Government are putting on local councils concerning the number of new homes that they are requesting to be built.

My view is Central Government should be challenged concerning the number of new homes that are required in West Oxfordshire, on a number of factors.

* The way people are now working, with faster broadband, and with access to Skype, fewer people now need to travel to work to sit at a “desk”.
* I have been in HR for 20 plus years, and I have seen a change with how people work. Given this factor it makes more sense to use Brown field sites rather than green field sites, as location will not be so key, and therefore less of a need for housing in the Thames Valley.
* With an aging population, limited pensions and with one in three over eighty years of age having dementia /Alzheimer’s housing needs to reflect this issue. So I feel that the planning strategy should be for smaller and more community based housing.
* Oxfordshire attracts many tourists, so more urban sprawl will damage the feel of the county, and will impact many businesses if the county does not remain an attractive destination for tourists.
* Coming out of the EU many also impact demand for housing, so I feel that the pace of building more houses should slow down, until we see how this impacts the UK.
* With regards to my local area of Stonesfield I support the comments that have been shared by the Parish Council, with the scale of the proposed housing, and the impact this will have to the village. The drainage infrastructure is a massive concern, also much of the village sits within the AONB and Wychwood project.

I took hope that you consider the points I have raised above.

I am writing both as a local resident and as the Rector of the 12 churches that make up the Shill Valley and Broadshire Benefice [www.12churches.org.uk [http://www.12churches.org.uk/]]. I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘North Carterton’ in Brize Norton.

Unless these considerations are taken into account, I propose that the proposed New Local Plan should not be accepted.

I object to the modified Local Plan primarily because, like the previous plan, it has to be assumed that a large part of the new population taking up the proposed housing stock will have employment outside the district or, at best, in the West Oxfordshire district and most people will travel to and from their places of employment by car. This can only mean that most people will use either the A40 or the A4095 as their main routes to facilitate their journeys. Although the Plan mentions that some access routes to the A40 will be built (from Witney North) or into Witney (West End Relief Road), the construction of both is entirely dependent on the relevant developers. While extra housing has been granted at Witney North (400 units) to pay for the West End Relief thus increasing traffic flow, there is no guarantee that either of these relief roads will be constructed without permission being given for additional extra units. It would appear that no consultation has been carried out with Oxfordshire County Council (OCC) to determine how they propose to provide adequate improvements to access to and from both roads along all their respective lengths. Taking into account permissions already given for extra housing in Long Hanborough and Church Hanborough and other villages in West Oxfordshire, both these roads will be already subject to extra traffic in the near future. Both roads already show signs of not being able to handle existing traffic loads, how they will handle already known extra traffic, let alone the

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<td>MM211</td>
<td></td>
<td>Gaye Olesen</td>
<td>-</td>
<td>Olesen</td>
<td>415</td>
<td>&gt; General Comments</td>
<td>I recognise that as a team you have some very difficult decisions to make with regards to the pressure that Central Government are putting on local councils concerning the number of new homes that they are requesting to be built. My view is Central Government should be challenged concerning the number of new homes that are required in West Oxfordshire, on a number of factors. * The way people are now working, with faster broadband, and with access to Skype, fewer people now need to travel to work to sit at a “desk”. * I have been in HR for 20 plus years, and I have seen a change with how people work. Given this factor it makes more sense to use Brown field sites rather than green field sites, as location will not be so key, and therefore less of a need for housing in the Thames Valley. * With an aging population, limited pensions and with one in three over eighty years of age having dementia /Alzheimer’s housing needs to reflect this issue. So I feel that the planning strategy should be for smaller and more community based housing. * Oxfordshire attracts many tourists, so more urban sprawl will damage the feel of the county, and will impact many businesses if the county does not remain an attractive destination for tourists. * Coming out of the EU many also impact demand for housing, so I feel that the pace of building more houses should slow down, until we see how this impacts the UK. * With regards to my local area of Stonesfield I support the comments that have been shared by the Parish Council, with the scale of the proposed housing, and the impact this will have to the village. The drainage infrastructure is a massive concern, also much of the village sits within the AONB and Wychwood project. I took hope that you consider the points I have raised above.</td>
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<td>MM217</td>
<td></td>
<td>Harry McInnes</td>
<td>The Rev’d</td>
<td>McInnes</td>
<td>421</td>
<td>&gt; General Comments</td>
<td>I am writing both as a local resident and as the Rector of the 12 churches that make up the Shill Valley and Broadshire Benefice [<a href="http://www.12churches.org.uk">www.12churches.org.uk</a> [<a href="http://www.12churches.org.uk/">http://www.12churches.org.uk/</a>]]. I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘North Carterton’ in Brize Norton.</td>
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<td>MM226</td>
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<td>Ian Hogg</td>
<td>Mr</td>
<td>Hogg</td>
<td>430</td>
<td>&gt; General Comments</td>
<td>Unless these considerations are taken into account, I propose that the proposed New Local Plan should not be accepted. I object to the modified Local Plan primarily because, like the previous plan, it has to be assumed that a large part of the new population taking up the proposed housing stock will have employment outside the district or, at best, in the West Oxfordshire district and most people will travel to and from their places of employment by car. This can only mean that most people will use either the A40 or the A4095 as their main routes to facilitate their journeys. Although the Plan mentions that some access routes to the A40 will be built (from Witney North) or into Witney (West End Relief Road), the construction of both is entirely dependent on the relevant developers. While extra housing has been granted at Witney North (400 units) to pay for the West End Relief thus increasing traffic flow, there is no guarantee that either of these relief roads will be constructed without permission being given for additional extra units. It would appear that no consultation has been carried out with Oxfordshire County Council (OCC) to determine how they propose to provide adequate improvements to access to and from both roads along all their respective lengths. Taking into account permissions already given for extra housing in Long Hanborough and Church Hanborough and other villages in West Oxfordshire, both these roads will be already subject to extra traffic in the near future. Both roads already show signs of not being able to handle existing traffic loads, how they will handle already known extra traffic, let alone the</td>
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<td>MM230</td>
<td>James Bugg</td>
<td>435</td>
<td>General Comments</td>
<td>additional proposed traffic resulting from the proposed Local Plan, appears not to bother either local authority. OCC seems to think that rail travel into and from Oxford from Hanborough Station will be part of the solution, ignoring that it is a “short” station only allowing rail travellers access to only 3 carriages, land is short to provide any extra facilities (ticket machines, bike parking) and travel to the station along the A4095 will be subject to delays and hold ups making travellers late and likely to miss their train. Access to the A40 from Witney is inadequate. Only the central junction allows both east/west access, so any traffic from west Witney wanting to travel east has to gain access via central Witney; a similar problem faces those in east Witney wanting to travel west. Central Witney is very old, with narrow streets and a meandering street layout. Access to the A40 or the A4095 is difficult at any time of day, at peak times it is a nightmare. The Local Plan proposes to pour additional traffic into it. Stupid. When OCC had its proposals for an internal relief road rejected, it promised to do it all it can to secure an east/west junction at the east Witney junction (Shores Green). It has not mentioned this new junction for many months, presumably it has been dropped this new junction from its future road plans. At the moment it has proposed plans out for consultation for a Park and Ride Scheme at Eynsham for access to and from Oxford. Without going into great detail, such a plan has inbuilt problems, namely for car users west or north of the site to access it they would have to use the A40 or the A4095 and would be subject to the problems already outlined. Unless these considerations are taken into account, I propose that the proposed New Local Plan should not be accepted.</td>
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<td>MM271</td>
<td>Marilyn Cox</td>
<td>484</td>
<td>General</td>
<td>Thank you for providing NO Links on your web site to comment on this plan. If I was cynical I would suspect this was deliberate. Housing in the City of Oxford could at least be partially provided by developing some of the College sports fields in the City. Most would enable residents to walk, cycle or use existing public transport. New sports facilities could be provided outside the City and bus students out to them. This works for example at Newcastle University. Students are only up for 24 weeks per year whereas households are occupied for at least double this. The new facilities could be considerably landscaped, with new pons and woodland for wildlife. These would reduce the traffic impact this plan will have. Oxford has developed like a doughnut with much employment outside the centre so even if this plan included improved access to the centre this would not help many workers. Half a bus lane, one way only will not solve any access problems. A whole new road access to Oxford from Witney &amp; Carterton is required before any more large development is allowed, probably onto the ring road before Botley. The Toll Bridge at Eynsham must be purchased and a new bridge built as this is another major block to traffic flow. Any accident on a Witney-Oxford road causes complete grid lock as do any events at Blenheim. More traffic generated by more housing will increase the frequency of accidents. Development along the A40 should only be permitted AFTER the road has been upgraded properly not before as has happened previously. New developments provide funds for community benefit, in addition to this money, if the City is happy to dump its obligations onto the surrounding districts maybe they should pay an additional equivalent amount to each district. Until car use declines this problem has to be addressed.</td>
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<tr>
<td>MM274</td>
<td>Mark Tonks</td>
<td>Mr Tonks</td>
<td>487</td>
<td>General Comments</td>
<td></td>
<td>acres of development that serve no-one but their own investors. The applications for development of Alvescot Downs [erroneously dubbed 'West Carterton - it is nowhere near Carterton] and 'North Carterton' [ditto re-naming] are prime examples. They must be stopped and developers made to understand that organic growth is what this district requires; lazy concreting of entire areas of this flood-prone countryside will never be permitted.</td>
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<tr>
<td>MM278</td>
<td>Martin Vessey</td>
<td>Prof Vessey</td>
<td>492</td>
<td>General Comments</td>
<td></td>
<td>Dear Sirs, thank you for the opportunity to feedback. A) At the micro level assuming compliance with the inspectors finding is mandatory: 1. The planned improvement to the transport infrastructure is insufficient to serve the increase housing and industrial plans at Witney / Eynsham, also to provide access to Oxford hospitals etc. The A40 needs to be dual carriage way inc Sunderland Avenue through to Cheltenham, Gloucester / M5, Headington roundabout will need an underpass (required to support Oxford new housing alone). The A34 needs to be a Motorway (connection to the docks / M40). A rail link from Witney to Oxford needs to be reinstated. 2. More car parking will be required in Witney. Building 50 houses on the existing car park is absolutely ridiculous. 3. Leisure facilities in Witney and Woodstock lido will need investment to maintain living standards / health of the community. 4. Local Community health centres may need further investment. B) At the Macro level the long term happiness, well being and sustainability of the country will require courageous leadership both from Central and local Govt. Ultimately we cannot build our way out of this growing crisis. Yes we do need more housing etc now but I see no sustainable long term vision. The unacceptable truth is that we need a highly educated population delivering innovative technological industry and solutions to support our World standing, economic well being, pensions etc but with a population level that our land mass can feed whilst also maintaining a balance of open/wild spaces. Given that we nearly starved as a Nation during previous conflicts that might suggest a sustainable population today of c 40m - 50m ?? Not the c 70m we probably have (who knows?). Apologies for making this point B) but I think its about time it was discussed and debated, even if this is not an ideal opportunity. Your faithfully Mark Tonks</td>
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<td>MM279</td>
<td>Parish Councillor</td>
<td>Mary Ann Canning</td>
<td>Mrs</td>
<td>Canning</td>
<td>497</td>
<td>&gt; General Comments</td>
<td>Although improvements are planned to the A40 these will not address long term congestion under increasing pressure from new housing. The only reliable long term alternative is a new public transport route utilising the former railway line between Witney and Yarnton Junction, potentially extending to Carterton. The line of this route should be safeguarded from development at all costs.</td>
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<td>MM194</td>
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<td>Philippa 898</td>
<td>Mrs</td>
<td>898</td>
<td>554</td>
<td>&gt; General Comments</td>
<td>I have considered the WODC draft Local Plan, which is currently being consulted on, containing the proposals for a total of 15,950 homes to be built by 2031. I have a number of concerns which I outline below. Firstly, I support the need to develop further housing to deal with the housing demand we face in England and recognise the revised proposals are to deal with overflow development from Oxford under the Council’s duty to collaborate. Whilst supporting the general need for housing, building must ensure communities are sustainable. There are elements of the plan which have not effectively demonstrated they meet this criteria. To allow housing to develop, matching infrastructure and community facilities must be in place to cope with it. Currently, Oxfordshire’s roads are congested and in poor condition, bus services are reducing, social/childrens care facilities are threatened with closure, waiting times for NHS appointments are growing and access to services challenging even before implementing measures to save almost £500m in the Berks, Oxon, Bucks Sustainability and Transformation Plan over the next 4 years, water and sewage systems barely cope with current demands and there is there are insufficient school places etc. I would have expected consultation to have referenced other local plans, such as the Berks, Oxon and Bucks Sustainability and Transformation Plan, rather than the almost expired Health &amp; Well-being Strategy; The STP requires costs to be cut by almost £500m to ensure sustainability of health services. This already looks unsustainable, clearly there is no room for investment given the scale of deficit, which no developer will be able to afford to bridge. The Horton General Hospital services are under threat, as is Chipping Norton Hospital and the plan proposes ‘primary care at scale’, which I presume will mean GP surgeries closing so patients have to travel to larger ones elsewhere. Given a number of options are being proposed to be added to the plan, to meet unmet demand from Oxford, it...</td>
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practice is failing to cope adequately with the existing work load. The John Radcliffe Hospital is saturated by the needs of patients. Furthermore, the flow of traffic to that hospital is often at a standstill for substantial periods of time and car parking is totally inadequate.

We realise that you are in a "catch 22" situation since without an approved local plan, developers can essentially build wherever they like since the Government has thrown out much planning law. Nonetheless, sanity must surely prevail!

One last point. As we view the many developments already in progress in West Oxfordshire and elsewhere, we see little sign that adequate attention is being focussed on the needs of young first time buyers. Rather, developers are concentrating on making the maximum amount of money that they can (as, sadly, is now to be expected from our selfish, greedy society). The only bright point is that much current building is aesthetically much more attractive than that in the recent past.
is a reasonable assumption that the main employment opportunity will be Oxford as will accessing a number of services and facilities. For the proposed development in Stonesfield, coming on top of current developments in the village, the consultation document has not adequately considered the transport impact. Routes to Oxford are very congested and will worsen given the proposed Woodstock development; the road to the village has seen fatalities and collisions and the junction at the Duke of Marlborough to the A44 is known to be a serious accident black spot. There is no pedestrian or cycling facility beyond the village boundaries.

The plan to develop on greenfield land in an Area of Outstanding Natural Beauty in Stonesfield, runs counter to the Stonesfield Community Plan produced in 2012/13 following grants from Stonesfield Parish Council and Oxfordshire Rural Community Council. This Plan, which reflects public consultation, appears not to have been considered by WODC in preparing its draft Plan, which would suggest it has been inadequately considered in the Local Plan preparation and consequently may not have met the Council’s legal duty to consider the result of consultation.

The Stonesfield Community Plan was prepared following consultation with local interest groups, the community (via events) and a survey of every household. In the survey, residents were asked about new housing developments. 75% said they were happy with no more than 12 houses in a development. The Charity Farm development has already exceeded this, as have combined total new developments in The Ridings/Farley Lane. Further development in the Local Plan will establish sites which exceed the wishes of local residents already consulted on.

In the Community Plan, 40% of respondents walked in the village most days and 71% at least once per week. There are many areas of the village without pavements and the village, through overwhelming choice, has no street lights. The proposed increase in traffic within the village and the dangers posed to pedestrians, cyclists and children has been inadequately represented in the plan.

To create the necessary infrastructure (road, health, social care, education, sanitation) to develop on the scale proposed in Stonesfield on top of current developments, does not appear to be covered in any local plans by statutory bodies and there is no evidence presented in the plan to suggest its creation and ongoing revenue cost would be sustainable, even with developer contributions; without it, the community will be unsustainable and will suffer significant detriment.

We would like to make a few points about some of the proposals in the latest iteration of the local plan. The original proposal included planning for 600 homes on the Tank Farm area of the town. Though we might not welcome it wholeheartedly, we felt this was achievable and could be sustained by the town. However the new proposal suggests up to 1400 homes on the same site. We do not feel this is a realistic goal.

There are other sites in the town which would help towards achieving the government-imposed quotas, notably the ‘Archstone’ proposal for homes on the Western edge of the town. Although this is within the AONB, a visit to the site reveals that this area is not particularly endowed with natural beauty, and we suspect that only diehard environmentalists would raise objections.

Whatever the size of proposed developments in the town, an important principle is that the supporting services, roads, parking, water supply, electricity, gas and drainage must be provided at the same time, it often seems as if these essentials are forgotten until some crisis forces a belated reconsideration.

We are aware that industry and commerce cannot be forced to establish themselves in Chipping Norton. However, if they are not encouraged to do so, the town will simply become home to numbers of commuters,
who must travel daily to their workplaces. This goes against the principles we have been told to adopt on environmental grounds, of minimising travel and transport costs generally.

Part of the proposal includes the provision of a link road from the London Road to the Burford road. This would clearly have some benefit; but because the bulk of heavy goods traffic is travelling to and from the Evesham-Worcester area, it is unlikely to significantly mitigate the present problems we experience daily with air pollution and traffic density in the town centre.

Finally a couple of points which may not be grounds for comment on the local plan, but which we hope could be directed towards policy makers for consideration.

First, the demand for new housing might be more sensibly met by creating new population areas closer to existing industrial and commercial centres. These are likely to have better road and rail links, and may attract more employers because of this.

Second, is the demand which has been expressed realistic? Chipping Norton would expand by about 50% as a result of the local plan proposals. If this is reflected over the whole country, it would imply an increase in population by the same amount. Even allowing for the need to house people currently inadequately homed, this would imply a much larger increase in the UK population than recent trends would predict. Possibly the Government should be encouraged to re-examine the proposals.

[Table]

I would like to respond to the proposed changes to the West Oxfordshire Local Plan 2031, but firstly I’d like to complain about the difficulties I encountered with the official response forms. I found the form and guidelines almost impossible to understand and complete. It was obviously designed to make it as difficult as possible to raise objections and deter any possible objections from anyone with only a basic level of education. I hope this discrimination will not continue and my comments here will carry as much weight as any given on an official form?

I have several objections as follows:

- Access to the plot by potential residents and distance to local amenities
- Additional pressure on inadequate community services
- The danger in the lack of facilities for young adults in a quite village

Access

Most new residents are most likely going to want to get to and from Oxford during the week so any development should be on the Oxford side of Woodstock. The main access to the Banbury Road development will increase traffic on the Hensington Road where the narrowing of the road will make additional traffic unacceptable and dangerous for pedestrians.

The other option is the Shipton road past the two schools where during peak time the road is already reduced to one lane and can’t cope with the current level of traffic. In addition, it will drastically increase the likelihood of further accidents and endangerment of young children on their way to school. Cars are parked on the side of the roads from the corner of Shipton road by the Marlborough school, past the primary school and even on the mini roundabout. Cars also park down the Banbury road for people attending the Wootton Drama school. Just the other day a young lad jumped out from between two parked cars on that road and if it weren’t for the fact I
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<td>MM318</td>
<td>Cotswold Woollen Weavers</td>
<td>Mr Martin</td>
<td>580</td>
<td>General Comments</td>
<td>was driving well under the speed limit I would have hit the poor boy. What new roads or bypasses are you going to propose to protect the school children from the obvious dangers?</td>
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<td>Community Services</td>
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<td>The current waiting time for a doctors appointment is 3-4 weeks last time I phoned. The Woodstock surgery is already woefully inadequate for the current population and I’m told the schools are already over-subscribed. I couldn’t find anywhere in the plans where the proposed new schools and doctors will be built. Surely you’re not going to leave it to chance that there will be additional land available after the houses have been built to create these services? Also leaving it up to the discretion of the development company to fund and create these services is a joke. These need to be made clear at the planning stage before the first brick is laid.</td>
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<td>Parking. The new sites on the Banbury Road and Old Woodstock are so far away from amenities that most of the new residents will need to drive to the town centre. Where will they park? Also, the Banbury road development is a considerable distance from the nearest bus stop. Is this housing only aimed at the young or commuters? What about the elderly? How will they access the town centre? How will they catch the busses? These sites really haven’t been thought through.</td>
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<td></td>
<td>Cotswold Woollen Weavers</td>
<td>Richard Martin</td>
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<td>Young people in Woodstock</td>
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<td>I know it’s a subject that no one likes to talk about and I’ve found that a lot of people in Woodstock won’t even hear about it but what about the drug problem? Without adequate facilities for young adults who can’t drive, or aren’t interested in football, it’s very easy to fall into the drug scene in this village. There are parts of the village you can’t drive through without the stench of weed overpowering you. Young teenagers rack up debts and develop smoking habits out of boredom. These plans need to include entertainment e.g. a cinema, fast food (McDonalds or KFC) places where they can congregate and socialise openly not hiding at the back of the football pitch smoking drugs! Unfortunately, a KFC would ruin the rural aesthetic of the village but that’s just the price we as a community are going to have to pay if we are to double the size of the village.</td>
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<td>Thank you for taking the time to read my objections. I hope they will make it obvious that any development needs to be made on the Oxford side of Woodstock to protect the lives of our children and that the Banbury Road site is wholly unsuitable. In addition, more consideration needs to be given to the infrastructure if we are to double the size of the village. The changes to the plan do not work. Please reconsider.</td>
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<td>A principal thrust of the amended Local Plan is increased housing numbers. I rather doubt they can be justified except in the context of convoluted and somewhat imaginative planning arithmetic, but accept that WODC had little option but to comply with direction to include them.</td>
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<td>Most people in Filkins and surrounding villages wish to see Carterton vibrant and prosperous for it is our local town and we rely upon its facilities for our daily needs. But there seems to be no new evidence that another strategic site in the Carterton Sub-region would encourage sustainable economic growth in the town.</td>
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<td>I therefore continue to support the Local Plan as amended and re-submitted to the inspector and, in particular, I support the Local Plan’s continued rejection of development on Alvescot Downs (known as ‘Carterton West’.)</td>
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<td>Lastly, I thank WODC and its officers for the careful way in which they have brought the Plan to this point: a process much longer than most of us would have anticipated.</td>
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<td>MM319</td>
<td>Richard Stevens</td>
<td>Mr Stevens</td>
<td>Stevens</td>
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<td>&gt; General Comments</td>
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<td>MM332</td>
<td>Ms Couch</td>
<td>Ms Couch</td>
<td>Couch</td>
<td>615</td>
<td>&gt; General Comments</td>
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<td>MM346</td>
<td></td>
<td>Stephen Hurst</td>
<td>Mr</td>
<td>Hurst</td>
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greenbelt, near to existing employment and schools? Or is it realistic to assume people housed in the new developments will work locally? The reality is likely to be large increase in commuting along the A40. Increasing road capacity is not the answer- we need more ambition and better co-operation between all councils and government to provide a long term solution. Schools, nurseries, medical centres and drainage around Eynsham are also at capacity.

Answering these challenges could be an opportunity to make use of unrivalled local expertise to develop innovative solutions to work, travel and low carbon living. We should aspire for the best- using local knowledge but also attracting leading designers through design competitions.

There is a real need for truly affordable housing for locals and the allocation of new housing is far from clear. There is a major concern that new housing will become Oxford commuter overspill next to a near stationery A40, rather than a real local community, serving local need and local business. What evidence is there of demand for a science park in a new village? Eynsham already has an underused industrial site which could be upgraded to accommodate science facilities and related housing. On housing, we have little information on the evidence base and the examination of alternatives. Are housing needs and growth targets achievable, desirable and up to date? Is the assessment of alternatives rigorous and is the study available?

People choose to live here because it has access to the attractive countryside, but this access would be reduced. Eynsham is already very dense with little public greenspace and little tree planting; therefore any new development will need to protect areas of greenspace and give residents ready access on foot to the countryside, as set out in Eynsham Neighbourhood Plan and Policy EH3.

It is also unclear whether air quality in the area has been tested, whether it is within legal limits and whether these limits will be breached, or further breached, due to increasing congestion and development.

Consultation

I am appalled that neither the Eynsham Neighbourhood Plan group nor Eynsham PC were involved in the major revision to the Local Plan during their open consultation with WODC, as part of the very through neighbourhood planning process. It seems we are being penalised for being too co-operative.

This is not an example of local democracy. There are terrific skills in the community- please use them rather than ignore them!
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<td>MM368</td>
<td>Aston, Cote, Shifford &amp; Chimney Parish Council</td>
<td>Mrs Sandhu</td>
<td>695</td>
<td>&gt; General Comments</td>
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The members of Aston, Cote, Shifford & Chimney Parish Council discussed the above consultation at their meeting on 1 December 2016.

We are concerned about the significant increase in the volume of new housing proposed for the district which...
would put significant pressure on the existing infrastructure, including the road and public transport network, schools, medical services, the fresh water supply and the waste water system. We would remind the District Council that concerns about the inability of the infrastructure to cope with significant growth was why the previous version of the plan contained a lower housing target. Whilst we understand that the Inspector has put pressure on the District Council to increase the planned housing growth included in the Plan so that it meets the levels identified in the SHMA and West Oxfordshire’s share of Oxford’s “unmet need”, the level of housing growth proposed can only be delivered if there is significant investment in the infrastructure to support that housing, otherwise the quality of life and the vitality of the economy of the district upon which we all depend will be significantly adversely affected. We can only assume that the District Council has identified the infrastructure improvements which will be required to support the planned housing growth, but given the national pressures on public funding, has the District Council identified with confidence where the funding will come from for the required infrastructure improvements?

On the positive side, we are supportive of the intention for the housing growth contained within the Plan to be focused on the towns and larger settlements in the District which do already benefit from significantly more infrastructure than the villages and smaller settlements.

Given that the Plan will continue to put the entire district under ongoing pressure to provide housing growth and the infrastructure concerns raised above, we think that it would be appropriate for the District Council to put some protections in place for the smaller settlements. We would like there to be consideration to the principle of putting a “cap” in place on growth within the smaller villages and settlements such as Aston and Cote so that existing and potentially new residents can be confident that their settlements will not grow beyond what the existing infrastructure can accommodate. We would also like the District Council to consider what measures it can put in place to refuse new planning applications when there are already existing applications (outline or full) for development within the same settlement that the applicant/developer hasn’t yet built. In Aston we are seeing new applications being submitted for significant developments (for the size of our settlement) despite there already being permissions in place for earlier applications which would deliver growth which could be accommodated. The cumulative impact of applications which have received approval but have not yet been built need to be taken into account when new applications are being considered.

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### Comments

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| MM372         | Vale Council            | Planning Policy | Vale of White Horse District Council | 705 | > General Comments | Thank you for the opportunity to comment on the proposed modifications to the West Oxfordshire Local Plan 2031. We have reviewed the key changes made to the local plan, and updated supporting evidence, and have no objections to the new proposals made, which principally seek to meet the district’s objectively assessed needs in full as well as delivering an agreed portion of un-met housing need from Oxford City.

We look forward to future engagement with you and the other Oxfordshire authorities as part of the Duty to Co-operate on matters of strategic importance. |
| MM36          | Richard Munro          | Mr              | Munro           | 74               | > General Comments | WODC is to be commended on continuing to try to base its Local Plan on evidence and a strong commitment to community engagement in the spirit of localism, while doing its best to respond to external pressures from government and developers. |
| MM380         | Berks, Bucks and Oxon Wildlife Trust | BBOWT - Haidrun Breith | Mrs | Breith | 772 | > General Comments | On a general note we are concerned about the proposed quantum of development proposed in the district, which is mostly rural in character and rich in habitats and wildlife. Development on the proposed scale will inevitably impact on wildlife even if the most ecologically-rich areas are avoided.

Having said this we recognise that latest modifications are the Council’s response to address the requirements for more housing put forward by the planning inspector in spring this year. If development on the proposed scale has to happen we consider it essential that it is located in places where it causes least environmental |
Impacts and is of a layout and design that allows for green infrastructure and biodiversity to be integrated into the development creating diverse and high quality environments.

The following comments aim to assist with this process. Where applicable we have added the modification numbers (Main XX) and (Minor XX) for ease of reference.

Existing policy wording is shown in italics with new wording being added in italics and underlined.

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<td>Bill MacG.</td>
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**Public Realm and Green Infrastructure**

We welcome the inclusion of a public realm and green infrastructure policy. Para 8.24 outlines components of Green Infrastructure (GI) but it does not provide a succinct definition. We feel that this section would benefit from such a definition.

It is my understanding that there is no overall Green Infrastructure strategy for the District to inform and compliment development proposals and we consider it important that a district-wide Green Infrastructure Strategy is developed to inform the growth agenda.

Such a strategy should provide an overview of the existing GI assets within the district, consider opportunities for enhancement and creation of new assets, outline a series of potential projects and provide advice on delivering green infrastructure proposals. This should recognise the role street trees, gardens, waterways, public parks and open space can play as part of urban green infrastructure. Whilst such a strategy should be district-wide it is important to remember that habitats and landscapes are part of a wider network of GI that pays no heed to local authority boundaries.

Development should therefore be planned to avoid habitat loss and fragmentation, and opportunities should be sought to improve ecological connectivity, including through the creation, restoration and enhancement of linking habitats and ‘stepping stones’ through the landscape.

**Delivery**

We could find little information on Local Plan delivery. We are concerned that there seems to be no mechanism to deliver green infrastructure (including open space) and to provide long-term management. We recommend that green infrastructure and environmental projects are included in any CIL or S106 agreements.

This smacks of a panic modification to a plan that has not previously been agreed by WODC taxpayers! It is merely allowing central government (and Oxford County Council) to impose totally unrealistic housing/building targets on the District! I have no disagreement with a requirement for extra housing, but the scale being asked for here is totally unrealistic in this essentially rural environment, and is set to completely destroy one of England’s most attractive areas! Please stand up to the "panic" from "on-high" and let us have a sensible and well thought through response to this ridiculous plan! A few months now may well prove beneficial to everyone!

We do not need new so called “Garden Villages” and rural hamlets built over!!

We note that the LP makes reference to the Oxford Local Nature Partnership in places (e.g. para 8.19, appendix
3. Unfortunately this group no longer exists and relevant sections should be reworded to reflect this change.

MM381  Eynsham Society  Jolyon Cox (Hon. Sec., Eynsham Society)  Dr  Cox  804  > General Comments
We appreciate the unreasonable pressure placed on the District Council by the unrealistic estimate of housing need, both for West Oxfordshire and for Oxford City, plucked apparently out of thin air by a Local Enterprise Partnership with a vested interest in uncontrolled growth. Nevertheless we consider the Plan as it affects Eynsham to be unsustainable, grossly unfair and unsound, and we cannot support it.

MM384  Clanfield Parish Council  Clanfield Parish Council  Mr  James  827  > General Comments
Clanfield Parish Council support the Local Plan as now submitted to the inspector and in particular we support its rejection of development on Alvescot Downs known as 'Carterton West' and that the proposed site at Mill Lane Clanfield when considered through SHELAA was found not acceptable.

MM386  Cotswolds Conservation Board  Cotswolds Conservation Board  Ms  Rood  829  > General Comments
Overall the Cotswolds Conservation Board is concerned about the level of development that is now proposed within the nationally designated protected landscape of the Cotswolds AONB. It is the Board's view that this is contrary to the National Planning Policy Framework (NPPF) and Section 85 of the Countryside and Rights of Way (CRoW) Act.

The Chipping Norton and the Burford-Charlbury Sub-Areas are used to illustrate our concerns, but these concerns apply across the whole AONB.

MM386  Cotswolds Conservation Board  Cotswolds Conservation Board  Ms  Rood  838  > General Comments
The Cotswolds Conservation Board understands the requirement to meet housing needs. However West Oxfordshire District Council is required in law to 'conserve and enhance the natural beauty of an AONB' (Section 85 CRoW Act 2000). In addition, national planning policy, specifically Paragraphs 14 (and its associated Footnote 9), 115 and 116 of the NPPF all detail further requirements regarding development in AONBs. It is the Board's view that currently these proposed modifications do not afford the AONB a suitable level of protection.

In particular the Board recommends that the Overall Strategy includes greater consideration of the additional protection afforded to AONBs. Doing this will enable development proposals to be considered in a consistent manner which conserves and enhances the AONB.

MM388  Ainscough Strategic Land  Ainscough Strategic Land  -  Ainscough Strategic Land  840  > General Comments
2. PROCESS ISSUES
Introduction
2.1 Within this section we question if the Local Plan is able to satisfy the necessary legal tests associated with the preparation and examination of a Local Plan.

2.2 In summary, we take issue the fact that that Local Plan (as modified) is a very different plan to that which was originally submitted. The result is that not all reasonable alternatives have been considered in relation to how the District's increased housing needs (and Oxford's housing needs) should be met through the consultation and SA process, and the Council have failed to prepare the plan in line with their Statement of Community Involvement.

Background
2.3 The settlement hierarchy within the Submission Draft Local Plan5 identifies three Main Service Centres at Witney, Carterton and Chipping Norton as the primary focus for new homes, jobs and services. This is known as the 'three towns' spatial distribution.

2.4 Through the process, we have fully supported the Council's decision to pursue this option as the most sustainable, logical and realistic approach to future growth in West Oxfordshire.6 Indeed, the Sustainability
Appraisal (February 2015) justified this choice of spatial distribution in a robust and comprehensive manner.

2.5 The first Local Plan hearing sessions dealing with strategic matters, including the duty to co-operate and housing and employment requirements, was in November 2015. The Inspector made the following recommendations in his preliminary findings (examination documents IN 015 and IN 016):

* The overall housing requirement likely to increase to somewhere between the current proposed level (525 dpa) and the SHMA midpoint (660 dpa), or 10,500 to 13,200.
* Council will also need to take account of their apportionment of Oxford’s unmet needs (currently estimated at 15,000), which due to be determined by the Oxford Growth Board in July 2016, (rather than addressing it through an early review like the other authorities).
* That the plan should make additional allocations of larger sites and less reliance on windfall for delivering affordable housing, as the Inspector notes a substantial gap between affordable need and likely delivery from the plan.

2.6 It was therefore clear that the Council needed to identify and allocate significant additional sites across the district and at Paragraph 9.1 of the Inspector’s preliminary findings (examination document IN 015) he states:

“At submission, I consider that the SA had adequately addressed reasonable alternatives for a plan seeking only to address the needs of West Oxon. Two alternative options (a new village and concentration of development along transport corridors) were dropped following the Issues and Options Stage in 2008 (CD2 paragraphs 4.7-4.10). I consider that the rejection of these 2 options was reasonable for the reasons the Council gives in the context of meeting the needs of West Oxon alone. If any further work undertaken by the Council anticipates some apportionment of Oxford’s needs to West Oxon, then the range of alternative strategies to be considered in the SA will need to be reviewed.”

2.7 In response to the Inspectors preliminary findings, several changes to the housing requirements and distribution are proposed within the Proposed Modifications and were subject to a Sustainability Appraisal7.

2.8 The spatial distribution now includes the Main Service Centres of Witney, Carterton and Chipping Norton and focusses much more on the Eynsham area, which will have a new Rural Service Centre (Garden Village SDA).

2.9 The Council are of the view that the Proposed Modifications are an ‘adjustment’ to the strategy and settlement hierarchy and that the changes will meet the needs of the district without changing its character8.

2.10 Before addressing whether the proposed modified spatial distribution strategy represents a suitable / sustainable approach, we question whether the Council have followed the necessary process as set out in the Planning and Compulsory Purchase Act 2004, and supporting guidance.

The Process

2.11 We are now clearly at an advanced stage of the Local Plan process with initial examination hearings having taken place. Main Modifications are being proposed and we are being offered the opportunity to provide representations to the Council for their consideration before formally submitting the Main Modifications to the Secretary of State.

2.12 The Planning Inspectorates ‘Procedural Practice in the Examination of Local Plans’ (June 2016 4th Edition v.1) on this subject says the following at Paragraph 5.24:
'Where the Inspector identifies that there may be a need for MMs to the plan in order to resolve problems that would otherwise make the plan unsound or not legally compliant, the nature and likely extent of the MMs should be fully discussed at the hearings. These may consist of redrafted text, the omission of a policy or section of text (or the inclusion of a new one).'

2.13 The guidance goes on to state at Paragraph 5.26: 'If the Inspector considers that the plan may require MMs to make it sound/legally compliant, he/she must be satisfied that requirements for public consultation and sustainability appraisal have been or will be met with regard to the modifications.'

2.14 Paragraph 5.27 then goes on to consider the precise arrangements for public consultation on any proposed Main Modifications. It notes that this may vary from case to case but there are a number of important principles that apply throughout:

* it should be made clear that the consultation is only about proposed MMs and not other aspects of the plan and that these are put forward without prejudice to the Inspector's final conclusions on the plan;
* all representations made upon the MMs will be taken into account by the inspector;
* the consultation document should include all proposed MMs, whether initially suggested by the LPA or put forward by the Inspector, and there is no need to distinguish between the two in the document; the key requirement is that the Inspector should be reasonably satisfied at this point that the proposed MMs are necessary to rectify the unsoundness and/or legal compliance problem(s) that have already been identified;
* additional modifications should not be included in the consultation exercise but if they are published for completeness at the LPA’s request it should be made clear that they are not before the Inspector;
* the Inspector will not contemplate recommending a MM to remedy unsoundness or legal non-compliance unless any party whose interests might be prejudiced has had a fair opportunity to comment on it;
* the scope and length of the consultation on proposed MMs should reflect the consultation at regulation 19 stage (usually at least 6 weeks);
* the general expectation is that issues raised on the consultation of the draft MMs will be considered through the written representations process and further hearing sessions will only be scheduled exceptionally; and - in very limited circumstances, the Inspector may be satisfied that no party would be prejudiced by a possible new MM (or the amendment of one that has already been publicised) that he/she is contemplating towards the end of an examination; for example, this may be because the scope of the consultation that has already been undertaken on related MMs has adequately addressed this point or because a matter is being deferred to another plan.

2.15 Paragraph 5.28 of the PINS guidance goes further and states (bold our emphasis):

'There could be circumstances where the plan is so flawed that it is in effect irreparable: for example, the MMs that would be required might be so significant or extensive that they would amount to completely rewriting the plan. In this case an Inspector would have great difficulty in complying with a section 20(7C) request and in any event to do so would not be within the meaning of the Localism Act 2011. There is no discretion to reject a request under section 20(7C) but in practice in these circumstances, the Inspector would indicate to the LPA that such a request would be inappropriate. Withdrawal of the plan would normally be expected in such cases.'

2.16 The Council have put the Proposed Modification to the public and they have updated the Sustainability Appraisal. Whilst we welcome the opportunity to comment on these changes/modifications and support many (not all) of the changes put forward by the Proposed Modification Local Plan, we do not consider the Local Plan
is capable of complying with the relevant Acts and Regulations, or the Council's own set processes when preparing the Local Plan.

2.17 Ultimately, this is because the Local Plan Proposed Modification Version is fundamentally different to the Submitted Local Plan. Whilst there is no strict interpretation of what can and cannot constitute a Main Modification, it must be acknowledged that the Main Modifications being put forward as part of this Local Plan result in a very different quantum and spatial distribution of development patterns that effects residents, businesses and the environment within the area in many different ways.

2.18 With this in mind, the Council and the Local Plan Inspector need to be satisfied that the process has complied with the Planning and Compulsory Purchase Act 2004, the Localism Act 2011, and the Town and Country Planning (Local Planning (England) Regulation 2012. Upon a full review, we conclude that it does not. Compliance with the Planning and Compulsory Purchase Act (LDS and SCI points)

2.19 Section 15 of the Act refers to the requirements of a Local Development Scheme. The need to submit an LDS to the SoS for approval was omitted following the Localism Act (Section 111). However, Section 15 continues to confirm the LDS must (amongst other things) including:

* the need to set out which document will be development plan documents;
* the subject matter and geographical area to which they will relate to;
* identify any matter or area in respect of which the authority have agreed (or propose to agree) to the constitution of a joint committee; and,
* a timetable for producing development plan documents.

2.20 Section 17 confirms that documents that must be referred to in the Local Development Scheme are Development Plan Documents and a Statement of Community Involvement. The Council's revised Local Development Scheme 2016-2019 does indeed refer to the Local Plan and the Council's Statement of Community Involvement ("the SCI").

2.21 Section 18 highlights the requirements of a Statement of Community Involvement confirming one must be prepared and that it is a statement of the authority's policy as to the involvement in the exercise of the authorities functions under the following sections of the Act: Section 19 (Preparation of LDDs), Section 26 (Revision of LDDs) and 28 (Joint LDDs).

2.22 Importantly, Section 19 confirms that Local Development Plan Documents must be prepared in accordance / comply with the:

* Local Development Scheme (1);
* national policy, etc (2); and,
* the Council's Statement of Community Involvement (3) albeit only once the SCI is adopted (4); and,
* the plan must be subject to an appraisal of the sustainability of each policy (5).

2.23 Section 20 (Independent Examination) relates to the examination process confirming a Development Plan Document should not be submitted to the SoS unless they think it is ready for examination (i.e. that it is sound) (2b). Section 20(5a) confirms the examiner needs to consider if Section 19 has been complied with (i.e. the process / preparation of the plan, part of which is set out in the Council's own documents (the revised LDS and SCI).
2.24 In the context of Local Development Schemes, Paragraph 009 (reference ID: 12-009-20140306) of the Planning Practice Guidance, also states (bold our emphasis): “A Local Development Scheme is required under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). This must specify (among other matters) the documents which, when prepared, will comprise the Local Plan for the area. It must be made publically available and kept up-to-date. It is important that local communities and interested parties can keep track of progress. Local planning authorities should publish their Local Development Scheme on their website”

2.25 The Council’s LDS that was relevant at the time of submitting the Local Plan was dated January 2015 (examination document SD6). It set out the programme for the production of various documents, including the Local Plan, for between 2015-2018. It replaced a version of the LDS issued in March 2014 and there were several iterations before that dating back to April 2005. What is clear is that the Council have consistently altered LDS to reflect the altering and continually delayed Local Plan process. One might, therefore, be forgiving if the local community were not able to realistically keep track of what the Council where intending.

2.26 The position is further complicated by the fact that since the submission of the Local Plan, a further LDS Addendum has been issued dated July 2015 covering the period 2016-2019 (examination document SD6a). One of the major changes that we have noticed in relation to the production of the Local Plan between the LDS originally submitted and the latest version relates to how the Council intend to deal with Oxfordshire’s unmet housing needs. Indeed, the January 2015 version confirms that the Council would undertake an early Local Plan Review in relation to these unmet needs. It confirmed the Local Plan Review would have been an independent Local Development Document (LDD). Based on the timetable set out at Appendix 2 of the January 2015 LDS, it would have therefore undergone an informal consultation process (IC). We presume the Council set out this approach/timetable for the Local Plan Review because this is precisely approach advocated in the Council’s adopted Statement of Community Involvement for all LDDs (we come onto the relevance of the SCI shortly).

2.27 One of the major changes that we have noticed in relation to the production of the Local Plan between the LDS originally submitted and the latest version relates to how the Council intend to deal with Oxfordshire’s unmet housing needs. Indeed, the January 2015 version confirms that the Council would undertake an early Local Plan Review in relation to these unmet needs. It confirmed the Local Plan Review would have been an independent Local Development Document (LDD). Based on the timetable set out at Appendix 2 of the January 2015 LDS, it would have therefore undergone an informal consultation process (IC). We presume the Council set out this approach/timetable for the Local Plan Review because this is precisely approach advocated in the Council’s adopted Statement of Community Involvement for all LDDs (we come onto the relevance of the SCI shortly).

2.28 The July 2015 LDS ditches the Local Plan Review process (i.e. the separate LDD to deal with Oxford's unmet needs) and instead sets out the following timetable/approach, whereby Oxford’s unmet needs are to be addressed as part of this plan:

* January – August 2016 Preparation of evidence base, formulation of Main Modifications,
* August 2016 - Apportionment of Oxford City’s unmet housing needs agreed
* September 2016 - Cabinet/Council agree ‘main modifications’ consultation
* October 2016 - Consultation on proposed ‘main modifications’
* November 2016 - Review of consultation responses
* December 2016 - Submission of main modifications to Inspector
* February 2017 - Examination hearing sessions
* June 2017 – Inspector’s Response
* Sept 2017 - Adoption

2.29 Whilst some slippage has taken place, it is applaudable that the Council have broadly stuck to this new timetable. What is apparent, however, is that only one month has ever been envisaged in terms of considering representations to the main modifications before being issued to the Inspector / SoS.

2.30 Perhaps a month to review representations would not be entirely unreadable where the extent of modifications after an examination process were envisaged to be relatively minor in nature. However, bearing in mind the extent of the modification (the nature of which were evident after that last round of examination
hearings and the Inspector's interim conclusion), we find this somewhat surprising as it clearly implies the Council have assumed that the representations to the Proposed Modification will be slight and that this document is practically a 'fait accompli'.

2.31 Whilst we are highly sympathetic to the desire and rush to get Local Plans adopted, the process has to be entirely fair, transparent and meaningful. Given the Council are now at such an advanced stage of the Local Plan production and are under increasing pressure to close this process, we cannot see how the Council could genuinely seek to engage in a meaningful consultation process when allowing only one month to process responses received towards such wide spread modifications to the Local Plan.

2.32 We raise this now because once the Proposed Modifications are submitted to the Inspector / SoS for further examination, the Local Plan is assumed to be sound by the Local Authority. As we know, in testing the soundness of a Local Plan, an Inspector addresses a very specific set of tests. It is not the Inspector's role to determine if there is a better alternative for the Local Plan. However, the Local Plan process should be one of genuine consultation where the public, local communities and business including the development industry have a genuine ability to influence and inform local planning officers of whether there is a better or alternative option for development.

2.33 This type of genuine consultation and thought process can only be meaningfully achieved through Regulation 18 consultation, as prescribed by the Town and Country Planning (Local Planning (England) Regulation 2012, whereby issues and options relating to a Local Plan can be debated and discussed. Indeed, Regulation 18 (3) confirms that LPA's must take these representations into account when preparing the Development Plan Document and the NPPG reaffirms this position at paragraph ID 12-018-20140306, which states:

'Local planning authorities will need to identify and engage at an early stage with all those that may be interested in the development or content of the Local Plan, including those groups who may be affected by its proposals but who do not play an active part in most consultations.... ...Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out specific bodies or persons that a local planning authority must notify and invite representations from in developing its Local Plan. The local planning authority must take into account any representation made, and will need to set out how the main issues raised have been taken into account...

...Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications...

2.34 In short, the Council have not carried out Regulation 18 consultation in relation to the latest proposed changes to the Plan. We understand that Regulation 18 consultation is not a statutory requirement under the P&CPC Act 2014. Indeed, only Regulation 19 consultation is a statutory requirement as set out Section 19 of the Act, which the Council are currently undertaking.

2.35 However, as noted above, Section 19 of the P&CPC Act 2004 also confirms that one of the key tests is to ensure the Local Plan is prepared in accordance with the Authority's own Statement of Community Involvement. It is within the SCI where the authority sets out how it will deal with consultation under Regulations 18 and 19 of the T&CPC Regulation 2012.

2.36 The Council's SCI is dated December 2014. It therefore precedes the Publication (March 2015), Submission
(July 2015), and Examination (November 2015) of the Local Plan and therefore does not take account of the fact that a significant number of major modifications are required to the West Oxfordshire Local Plan.

2.37 With regard to Regulation 18 consultation, Figure 2.2 in the SCI (copied below as Figure 1 ATTACHED) notes that consultation with the public is optional.

2.38 Notwithstanding this, at paragraph 2.12 of the SCI the following is stated in relation to what the Council state they will do (bold our emphasis):

‘Anyone can be involved in the preparation of the Local Plan and planning policy documents. The hope is that by involving a broad range of people, especially early on in the process, there will be a better understanding of the issues and needs for the area by bringing together different perspectives, expertise and knowledge from local communities and stakeholders and providing an opportunity to shape and influence planning policies and future development. There are certain groups and organisations the Council must consult – statutory consultees – and others that the Council will seek to get involved.’

2.39 Subsequent tables in the SCI go on to list a range of groups, including harder to reach groups. In addition, from Pages 13 to 16 there are further tables/schedules setting out what consultation the Council will undertake. Copied below is what the Council confirm they ‘will always do’ and what they ‘may also do’ in relation to Regulation 18 when preparing the plan, gathering evidence and considering issues and options.

2.40 We don’t doubt the fact that the Council will have undertaken these various tasks when preparing the Submitted Local Plan. However, as previously noted, no Regulation 18 consultation has been carried out in relation to what is now a very different plan to what was originally submitted. Given the Council’s SCI clearly states they will always undertake ‘early engagement with local communities, businesses and other interested parties’, when gathering evidence and considering issues, it is hard to see how the SCI requirements have been satisfied in relation to the latest plan.

The Key Differences to the Submitted Local Plan and the Proposed Modifications

2.41 The changes to the Local Plan extend to no less than 242 Main Modifications! This many modifications to a Local Plan is significant in its own right.

2.42 The modifications are wide spread but key changes relate to the quantum of development that is required and the spatial distribution of development.

2.43 Importantly, no consultation prior to that in relation to these latest Proposed Modifications to the Local Plan have identified significant development at Eynsham or addressed the need to meet unmet needs from Oxford. Indeed, these options were not presented at the Regulation 18 consultation or as part of the Publication Draft of the Local Plan prior to submission.

2.44 A total of three spatial distribution options were consulted upon at the Regulation 18 Issues and Options consultation stage (March 2008):

* Concentrate development at Witney;
* Concentrate development at Witney, Carterton and Chipping Norton; and,
* More dispersed development amongst a variety of towns and villages but still including development in Witney, Carterton and Chipping Norton. Obviously there could be many variations to Option C given the number of villages in the District
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2.45 The Issues and Options consultation document made reference to other options which the Council did not consider appropriate or likely to conform with national and regional policy, and thus opinion was not sought on these options at that time. These included:

* A new village; and,
* Concentration along transport corridors, including expansion of existing settlements and/or new villages.

2.46 With regards to the ‘new village’ option (which was not location specific), the Council were of the view that the amount of development likely to be accommodated in a new settlement may not create a sustainable community within a reasonable timescale when considered within the West Oxfordshire context. The number of residents without access to a satisfactory range of services and facilities would increase and extra car travel would result. It was also recognised that a new settlement is a high risk strategy and is likely to need significant expenditure to fund new infrastructure.

2.47 Despite the Council’s initial dismissal of the ‘new village’ option they are now pursuing this as an option through the newly introduced the Garden Village SDA in the Proposed Modifications. Given the previous outcome of the Issues and Options consultation, it would not have been unreasonable for the public to rightfully assume that a refreshed Issues and Options consultation would be undertaken in light of the new evidence on housing needs and the need to accommodate some of Oxford’s unmet needs (particularly when this approach was set out in the LDS at the time of submitting the Local Plan).

2.48 Notwithstanding this and the fact that Policy EW1a suggests the Garden Village SDA will be a free-standing settlement, the reality is that it is directly related to the settlement of Eynsham. Indeed, the Garden Village SDA boundary falls within the Parish boundary of Eynsham (copied below) as does the West of Eynsham SDA.

2.49 Whilst the A40 separates the Garden Village SDA from Eynsham and it is proposed that it will contain its own services, the reality is that the existing northern defined settlement boundary of Eynsham goes right up to the A40. The Garden Village southern boundary also goes right up to the A40. Moreover, links between the two areas (including an iconic bridge) are actively endorsed and both the new and existing communities can interact, benefit from public transport services and utilise services in each area/settlement.

2.50 Notwithstanding this, Eynsham is described in the Submission Local Plan as a Rural Service Centre. For namesake purposes, it also appears to keep this definition in the Proposed Modifications in the Local Plan (Table 4.1). However, it would be folly to suggest that Eynsham is not physically expanding by virtue of these new proposals and that its character and role and function would not substantially alter. Indeed, Policy OS2 now confirms the settlements will make a “significant contribution” towards meeting identified housing needs of the area.

2.51 The Eynsham-Woodstock sub-area is to increase by 2,800 new dwellings to meet West Oxfordshire’s need. A further 2,750 homes will also be provided to meet Oxford’s unmet needs, therefore totalling 5,500 new dwellings over the plan period. The Eynsham-Woodstock sub area is therefore subject to 243% increase in the number of homes it needs to accommodate compared to what was presented in the original Submission Draft Local Plan (5,500 compared 1,600). This is a substantial change.

2.52 The parish of Eynsham had a population of 4,648 in 2011. Based on an additional 5,500 dwellings and the average household size of 2.36 for West Oxfordshire, the population change would increase by 12,980 people to over 17,600. This cannot be regarded as anything other than a substantial change to the Local Plan strategy.
particularly when considering the population figures of the three main towns: Witney (27,522), Carterton (15,769), and Chipping Norton (6,337). Indeed, Eynsham would essentially become the second largest settlement within the District in terms of its population.

2.53 MM5 also states there will be a need for the expansion of secondary school capacity to support the Garden Village and other growth in the area, which is one example of the impacts generated by the development which we consider should have undergone Regulation 18 consultation.

2.54 Overall the Proposed Modifications to the Local Plan represent a substantial change to the originally preferred ‘three towns’ strategy of Witney, Carterton and Chipping Norton and it has significant implications for the residents of Eynsham who have essentially had their right to contribute to the process through Regulation 18 consultation by-passed. For these reason, we consider the Proposed Modifications Local Plan is not in accordance with the Council’s own SCI and it therefore fails Sections 18 and 19 of the Planning and Compulsory Purchase Act 2004.

Testing Options in the Sustainability Appraisal for Overall Growth Requirements

2.55 As previously quoted at paragraph 2.6 above, the Local Plan Inspector has highlighted that the supporting Sustainability Appraisal would need to reconsider a range of new development options should West Oxfordshire have to meet some of Oxford’s housing needs.

2.56 Chapter 3 of the updated SA tests the following options, which reflect those during the previous versions of the Local Plan:

* Option 1: Witney Focus
* Option 2: Three Towns Focus – Witney, Carterton, Chipping Norton
* Option 3: Dispersed but still including development at the 3 Towns
* Option 4: Concentration along transport corridors including expansion of existing settlements and/or new villages
* Option 5: A New Village

2.57 Additional housing growth options have also been tested and the site / policy specific options for growth including the SDAs (including the new ones at Eynsham).

2.58 When combined with the above options, the 3 town strategy (Option 2) is still regarded as being the most sustainable and we accept there does not appear to be any overriding issues as to why the Eynsham sites should not be identified.

2.59 However, we would have expected to see a greater number of potential options relating to the spatial distribution of development being considered in light of the need to meet Oxford’s unmet needs as part of this Local Plan Sustainability Appraisal (notwithstanding the findings of other reports undertaken by Oxford). Indeed, we would have assumed a greater number of potential surrounding Rural Centre’s might have also been the focus of an assessment.

Testing Options in the Sustainability Appraisal for Growth at Chipping Norton

2.60 A further concern is the distinct lack of alternative options that have been considered through the SA for the direction of growth related to Chipping Norton. Only Tank Farm has been assessed. This compares to the approach taken for Witney where 6 options are tested including a ‘multi-site’ option (paragraph 3.8). The same
2.61 At paragraph 3.10 the following is stated: Directions of Growth at Chipping Norton: One strategic option (East – Tank Farm) has been considered through plan-making and tested through SA since 2010. Taking into account the Inspector's Preliminary Findings [INF015 & 016] and updated evidence indicating the need for an uplift in housing, this option was reconsidered by including a wider site area to accommodate further homes increasing from 600 to 1,400 dwellings plus the provision of 9 ha of employment land. This option was subject to detailed SA in February 2015 Appendix V [CD2] and the SA findings remain relevant and valid. The implications for the uplift in housing and employment land provision are considered in Section 4 of this SA Addendum Report.

2.62 Indeed, no other options for growth at Chipping Norton have been considered by the Council through the SA. Even at paragraph 3.14, where it is confirmed that the SA has considered 15 non-strategic sites (300 dwellings or less), none of these sites are within or adjacent to Chipping Norton. As one of the 3 principle towns, we would have expected such an assessment to have been carried out particularly in light of the scale of growth that Tank Farm is now expected to accommodate and the fact that the Local Plan inspector explicitly stated it was highly likely additional housing allocations would need to be identified for Chipping Norton.

2.63 Even the findings of the SA within Chapter 4 confirm many of the impacts of the Tank Farm proposal/policy are uncertain until further master planning is carried out. It is noted the potential loss of allotment spaces will be a significant impact. We are also unable to pay little regard to comments that suggest: 'positive effects for community SA objectives are strengthened as the larger scale of development could provide further green infrastructure – to be detailed in masterplanning.'

2.64 As we highlight in Section 4, there are serious issues with the ability for Tank Farm to accommodate 1,400 homes on the site as well as the other benefits that are being suggested in the policy. For this reason, other sites should have been tested irrespective of whether [TRUNCATED FOR EXCEL].

We believe the submission draft of the Local Plan, including proposed modifications, does not, but should, have explicit regard and reference to the potential impact of the housing developments on the viability and capacity of existing local schools.

For example, with specific reference to the proposed development of 1400 homes in the defined North Witney Strategic Development Area, the existing modification 103 (policy WIT 2) to specify the education solution for this Strategic Development area as being the development of WCP school, or a new 2FE school on site, does not have regard for, nor express any consideration of, the potential short and long term implications and impact of this proposal to Hailey School and, consequently, the sustainability of the Hailey parish community and infrastructure.

This appears to be in direct conflict with other references in the WODC Local Plan to protecting existing community facilities and infrastructure, improving rates of educational achievement, protecting and enhancing local employment opportunities, and employing sustainable transport strategies that minimise carbon emissions, among others.

The draft Plan also makes reference to the pressure schools are under already for pupil places with an acknowledged issue (pg 22) being “generally limited or no spare capacity in existing primary schools”. As various small, and initial phases of larger developments come on line, there will be children and families in immediate need of education before the new schools are built. We note with alarm the implications of this which could include “bulge” classes, or even imposition of additional temporary accommodation. Indeed,
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<tr>
<td>MM43</td>
<td></td>
<td>Peter Jay</td>
<td>Mr</td>
<td>Jay</td>
<td>88</td>
<td>General Comments</td>
<td>latest Pupil Plan (2016-2020) specifically cites these “solutions” as matters stand. Such unplanned and unmanaged reactive solutions could have serious consequences for the wellbeing of pupils and staff at a school, the quality of the education able to be provided, and also to the neighbourhood around the school, as transport and other infrastructure would not be in place to manage the additional capacity. Unlike many other Witney sub-area schools, with the right investment Hailey School does have the space to increase its capacity from a half to one form entry. We believe the Local Plan should consider opportunities to utilise existing schools like Hailey School to deliver proactive, planned and managed solutions for the infrastructure needs associated with developments. In our case, there is a need to understand the impacts on, and opportunities presented by Hailey School, for the developments across the wider Witney sub-area. There is currently no consideration of this in the draft Plan. For these reasons, we do not believe the submission draft, including proposed modifications, is sound, legally compliant or meets the duty to co-operate as it stands.</td>
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<tr>
<td>MM412</td>
<td>Shipton under Wychwood Parish Council</td>
<td>Shipton under Wychwood Parish Council</td>
<td>Ms</td>
<td>Wilkinson</td>
<td>913</td>
<td>General Comments</td>
<td>The Parish Council generally welcomes the Draft Local Plan on the basis that, when approved, it will provide a more settled background for the assessment of future planning applications. The current draft is in its overall emphasis an analysis of future housing needs and land availability. For it to be a Local Plan, properly defined, it would need to take a holistic, integrated approach to the relevant enabling issues that would make the achievement of the housing plan possible. These are mostly infrastructure issues such as transport links and upgrades to capacity, educational and medical facilities and their ability to cope with greatly increased demand, parking, road safety, clean air and other related issues. Importantly little consideration is given to employment available to the occupants of the newly available housing. Most of these</td>
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MM412 has a 20+ year resident in Woodstock; and for me these changes pile Pelion upon Ossa of rural vandalism, obliterating acre upon acre of pristine greenfield sites with the wrong houses in the wrong places for the wrong people at the wrong prices. This kind of developer-driven cynical opportunism, exploiting temporary loopholes in the broken-down NPPF system, catering for weekending bankers and mansion-seeking Mayfair retirees, does less than noting for the homeless or even the ‘barely coping’. The districts must rebel full-frontally against the intolerable abuse of the broken NPPF and demand an ‘emergency break’ to over-rule Inspectors who approve large schemes opposed by planning authorities and trying to creep under the radar because of bogus ‘housing supply’ calculations based on arbitrary and baseless numbers generated by the developers themselves masquerading as the unelected Local Enterprise Partnerships. This has degenerated into a naked racket respected by no one and bringing despair to all Oxfordshire residents and indeed to all others except developer shareholders who live somewhere else. Please call a stop now. Do not get bogged down in legalistic planning mumbo-jumbo. Speak instead for people, especially those who elected local councils to defend and protect their homes, their communities and their environment. |
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<td>MM415</td>
<td>Stonesfield Parish Council</td>
<td>Ms Hill</td>
<td>917</td>
<td>&gt; General Comments</td>
<td>matters are dealt with as an add-on afterthought which detracts from the value of the draft plan. The need for more housing is well understood and there is awareness of Central Government’s housing policy but the Parish Council is concerned about inaccuracies of the draft plan. The Local Plan was first prepared in 2011 and with the passage of time the two paragraphs which specifically refer to Stonesfield are incorrect. Para 9.6.2 states: Stonesfield has a population of 1500; this was no doubt taken from the 2011 census which is 1527. However, since 2011 about 80 homes have been completed or are in the process of completion during the next year. Consequently the population will rise accordingly to approximately 1700. Para 9.6.7 states: Stonesfield has seen considerable consolidation of development in the past with redevelopment of farmyards and conversion of barns for housing primarily during the 1980s and there has been only limited new build in recent years as few opportunities remain for residential development. The second part of the previous sentence fails to recognise that since the 2011 census and by the end of 2017, as stated above, some 80 new homes will have been completed. 33 of these are affordable, self-build or social housing. The revised numbers are partly included in the amended table 9.5. The paragraph ignores the fact that the preschool is over-subscribed and the primary school will be full when all current builds are complete. It is recommended that the 2 paragraphs are amended to reflect the current situation and read: Para 9.6.2: Stonesfield will have a population of 1700 by the end of 2017. Para 9.6.7: Stonesfield has seen considerable development in the past, with redevelopment of farmyards and conversion of barns for housing, primarily during the 1980s. Since the 2011 census and by the end of 2017 some 80 new homes will have been built. 33 of these are affordable, self-build or social housing. The preschool is over-subscribed and the primary school will be full when all current ongoing building is complete. If the 2 inaccurate paragraphs in the plan are amended to reflect the current situation the new scheme under consideration on land north of Woodstock Road to allow another 68 homes – 18 more than quoted in the draft Plan - is questionable. There is also the probability of 10-30 units – quoted as flexible – on land at North Farm. The village has exceeded any reasonable obligation to provide new homes and further builds will seriously over-develop this relatively small settlement placing a significant burden on facilities, resources, infrastructure and amenities within Stonesfield. On this point, the draft plan states certain criteria should be met, three of which are listed below: …be well located to the highway and public transport network, as well as having safe and convenient vehicular, cycle and pedestrian access to local services and facilities, especially schools, shops and healthcare …be of an appropriate location and scale not to have an adverse impact on environment or heritage assets and the character and appearance of the surrounding area.</td>
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| MM416 | Witney Town Council | Witney Town Council | Mrs | Groth | 919 | > General Comments | ..not conflict with the objectives of Green Belt or AONB designation.

On the first point, Stonesfield is only served by an hourly bus service which plies between Oxford and Charlbury; we lack footpaths and cycle ways, have one village shop, a failing public house, bus journey to doctors' surgeries and no street lighting.

On the second and third points a reminder is given that Stonesfield is a sensitive area, falling entirely within the AONB as acknowledged in the plan and as such any development within or on the edge of the village will need to be judged against the national policy considerations.

To conclude the necessity of this plan being passed is essential to curtail further speculative developers but it is hoped our concerns are given full weight when preparing the final copy for the inspectorate. |
| MM46 | Ramsden Parish Council | Ramsden Parish Council | Mr | Gammage | 96 | > General Comments | Comments from Ramsden Parish Council with points 1 and 3 relating to Ramsden and points 2 to 6 relating to the plan in general.

1) Ramsden is a small village and any future development, in such villages, should be appropriate in size.

2) There is a need for housing and affordable housing needs to be part of the overall plan. For example, a few years ago Ramsden PC supported an appropriately sized development (6 social houses) in the Parish.

3) AONB and Conservation areas should be protected.

4) Large developments should include improving the infrastructure at the developers expense and contain an element of affordable houses.

5) Approvals for larger developments should insist that all houses are built promptly. This is to avoid developers building up a large land bank for future development and consequently pushing up the price of housing.

6) All future developments should conform to high energy saving standards. |
Whilst the introduction sets out words relating to the importance of maintaining the special character of the region, based on concerns that have been raised, these appear to be hollow words of appeasement as the remainder of the draft plan fails completely to take any notice of this need. In addition, the underlying assumption of the planning inspector in terms of housing demand has been accepted verbatim without further analysis. This housing demand is based on forced growth targets and resultant people migration projections which were set pre Brexit and even then were highly questionable and totally undemocratic. The surprise Brexit vote and the current uncertainty of what that means for Britain, including the down projections of growth from the Bank of England and including statements from government suggesting the likelihood of a reduction in net migration, mean that any pre-Brexit targets and projections are now null and void. This means that the local planning process needs to go back to the first step, which is revision of targets based on post Brexit scenarios.

In terms of legal compliance, whilst the council has gone through the steps of the legal process, in terms of local consultation, there is an underlying assumption in the legal need to consult which is that significant issues resulting from that consultation will be addressed. Whilst there are words added in to the plan to recognise and in many cases affirm these issues, the actual plan fails to address them - either to apply effective mitigations or to conclude that such mitigations are not required.

In addition, I believe that there may be a major legal non-compliance with the plan, in that the impact of NOx pollution from the proposed new developments has not been adequately addressed and that the new developments will result in increases to emissions in areas which are already exceeding legally binding maximum levels and will, as roads approach gridlock, result in additional areas exceeding legally binding maximum levels. The plan fails to take account of the levels of increase in emissions on roads and in particular, fails to take account of the non-linear increase in emissions caused by congestion. Traffic moving in congestion emits several times more pollutants per cubic metre than the same volume of traffic moving freely. In addition, the plan fails to address the further increase in NOx emissions from the increase in central heating systems in the newly proposed housing where this adjoins already high NOx transportation routes. A report on the London Atmospheric Emissions Inventory http://tfeip-secretariat.org/assets/Meetings/Presentations/Ghent-2014/KKing-London-Domestic-Boilers.pdf estimated that 16% of NOx levels were due to domestic boilers. I therefore expect that with the increase in traffic burden, increase in congestion and increase in domestic NOx outputs, that the revised local plan, if enacted, would result in the council approving development that would directly lead to the breaching (and further breaching) of legally binding pollution levels.

It appears that the council has rolled over as a result of pressure from the planning inspector, based on outdated and forced growth targets. In doing this, the council has ignored its democratic responsibility as elected representatives of the local population. It also appears that the council has included words of thinly guised protest within the draft plan, however, as elected representatives of the local residents we look to the council to fight unreasonable demands, not to roll over and include fruitless words of protest.

Until the major issue of overall target setting is resolved and until the major issue of lack of addressing the local residents concerns is addressed, there is little point in commenting on the further details of the plan.
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<td>MM12</td>
<td></td>
<td>Helen G</td>
<td>Ms</td>
<td>Goldberg</td>
<td>13</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MIN 1</td>
<td>The erosion (incremental or not) of this designated area of natural beauty has simply been planned to help WODC achieve housing goals which are not well thought out and will have a devastating effect on Eynsham for the future. The effects of Brexit needs to be assessed in this region as well as the need for housing Oxford commuters in Eynsham without providing adequate transport links. No right minded person would choose to sit on the A40 for an hour twice every day. As such the plans are not logistically sound and without proper infrastructure changes have not complied with the DfC.</td>
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<td>MM71</td>
<td></td>
<td>JSBWx2</td>
<td>Mrs</td>
<td>Thompson</td>
<td>206</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MIN 1</td>
<td>Long term parking in Witney is at a premium. Building on the Woodford Road car park makes no kind of common sense. With an aging population, we desperately need adequate parking near health facilities. The hospital has inadequate parking.</td>
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<td>MM82</td>
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<td>David Lines</td>
<td>Mr</td>
<td>Lines</td>
<td>226</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MIN 1</td>
<td>My view is that the statement is flawed. There is no proven economic driver that requires an increase in housing on the scale required. West Oxfordshire is one of the most economically vibrant parts of the county and country.</td>
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<td>MM25</td>
<td>CPRE</td>
<td>Gareth Hammond</td>
<td>Mr</td>
<td>Hammond</td>
<td>41</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MIN 1</td>
<td>West Oxfordshire is threatened with massive change if these plans go through. It has been one of the most rural districts in the south east region &amp; that is why people have chosen to live here. Towns &amp; villages will have housing estates dumped on them, despite local residents not wanting them. So much for the much-vaunted localism that the government was boasting of. The infrastructure as usual will be an afterthought.</td>
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<td>MM8</td>
<td>andyswarbs</td>
<td>Mr</td>
<td>Swarbrick</td>
<td>9</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MIN 1</td>
<td>I simply do not understand why the word “incremental” has been underlined. It seems as if there is some hidden agenda here.</td>
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<td>MM69</td>
<td>Mugglewitch</td>
<td>Mrs</td>
<td>Sensicall</td>
<td>183</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MIN 3</td>
<td>Do any of these options include health centres, welfare, access to hospitals, transport to hospitals (and elsewhere) and schools? If Deer Park is closed that will make matters worse. This doesn't indicate future planning.</td>
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<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
<td>-</td>
<td>-</td>
<td>1848</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 2</td>
<td>MAIN 4 Para 2.9 states: &quot;Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of 'unmet' housing need that Oxford City are unable to provide for within their own administrative boundary.&quot; We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification.</td>
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We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1, 2, 13, 14, 15, 17, 23, 24, 27.

**MM69**  
Mugglewitch Mrs Sensicall 185  
> SECTION 1 - INTRODUCTION  
> MAIN 2  
Instead of lumbering Eynsham with more housing because Oxford needs it (are they utilising all brown field sites.) why isn't Oxford thinking about building a new town to meet it’s needs.

**MM753**  
David Wilson Homes Southern  
David Wilson Homes Southern c/o Barton Willmore 1865  
> SECTION 1 - INTRODUCTION  
> MAIN 2  
Main Modification (MM)2 of the draft plan confirms that an Area Action Plan (AAP) is proposed for Eynsham to address the issue of unmet housing need arising from Oxford City. As we will identify later in these representations, whilst not objecting to the principle of strategic development at Eynsham, concern is raised regarding the quantum of housing which is deliverable within the Plan period to 2031. The Council’s Local Development Scheme does not refer to the timetable for the preparation of this document. This introduces a further stage of plan making which may affect the timescale for the delivery of the strategic site, which the Council assumes will commence from 2021 onwards. This timescale will be challenging assuming adoption of the AAP is required before West Oxfordshire determines the relevant planning application. There are also massive infrastructure requirements, including a realignment of the A40 (required to maintain support from Eynsham Parish Council), and the power network in this area is wholly inadequate.

**MM752**  
Bloombridge Bloombridge Mr Cutler 1866  
> SECTION 1 - INTRODUCTION  
> MAIN 2  
Main Modification (MM)2 of the draft plan confirms that an Area Action Plan (AAP) is proposed for Eynsham to address the issue of unmet housing need arising from Oxford City. As we will identify later in these representations, whilst not objecting to the principle of strategic development at Eynsham, concern is raised regarding the quantum of housing which is deliverable within the Plan period to 2031. The Council’s Local Development Scheme does not refer to the timetable for the preparation of this document. This introduces a further stage of plan making which may affect the timescale for the delivery of the strategic site, which the Council assumes will commence from 2021 onwards. This timescale will be challenging assuming adoption of the AAP is required before West Oxfordshire determines the relevant planning application. There are also massive infrastructure requirements, including a realignment of the A40 (required to maintain support from Eynsham Parish Council), and the power network in this area is wholly inadequate.

**MM751**  
Goldfield Estates Goldfield Estates - - 1871  
> SECTION 1 - INTRODUCTION  
> MAIN 2  
MAIN 2 Para 1.18 states an Area Action Plan will be prepared for Eynsham. MAIN 49 POLICY E1 states that an AAP will be prepared for the Eynsham Garden village. We agree that an AAP should be prepared to guide the proposed Garden Village to the north of Eynsham to guide this strategic mixed use development. However we consider that the Local Plan should make clear that the AAP will not include the allocation to the west of Eynsham, which proposed Policy EW1b states will be secured through a 'masterplan'. The proposed modifications make clear that the two allocations will come forward separately with the Garden Village being self-contained and the land to the West of Eynsham creating a residential extension to Eynsham.

For the reasons set out about in relation to early delivery and the also the scale of the allocation we do not consider that an AAP would be required to support the delivery of the land the West of Eynsham.
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<tr>
<td>MM75</td>
<td></td>
<td>AJ04</td>
<td>Mr</td>
<td>Bickley</td>
<td>210</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 2</td>
<td>I find it very difficult to accept that this local plan does not include any detail on the 'Area Action Plan' for Eynsham. We are being asked to accept a local plan that could be completely revised and changed by the AAP with no idea what it may say.</td>
</tr>
<tr>
<td>MM76</td>
<td>Milton-under-Wychwood Acton Group</td>
<td>oandachapple</td>
<td>mr and dr</td>
<td>Chapple</td>
<td>212</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 2</td>
<td>The basis on which the calculation of Oxford City's unmet housing needs is calculated and allocated are unsound for the reasons stated in the comment on 1.17. Oxford City must be required to exercise more assiduity and creativity in meeting its housing needs, and to alleviate the need for commuter dwellings in peripheral districts.</td>
</tr>
</tbody>
</table>
| MM788        | Mr Murray and Mr Blackwell | Mr Murray and Mr Blackwell | Mr | Murray and Blackwell | 2298 | > SECTION 1 - INTRODUCTION > MAIN 2 | MAIN 2- Paragraph 1.18 
2.2. The landowners do not support the provision of a garden village at Eynsham and in terms of developing the policy framework for the site, it considered that the commitment to the preparation of an AAP for Eynsham is premature given that no Government decision has been made on the proposal. |
<p>| MM370        | Brize Norton Parish Council | Mrs Peach | 715 |  | &gt; SECTION 1 - INTRODUCTION &gt; MAIN 2 | 2.4 Unsound as incorrect population recorded |
| MM61         | NP                      | Mr Pearce | 135 |  | &gt; SECTION 1 - INTRODUCTION &gt; MAIN 1 | On the contrary, it appears that WODC is over-cooperating. Why should Eynsham bear the whole burden of meeting Oxford City's unmet housing needs? As the &quot;Notes to Accompany the Model Representation Form&quot; say, these unmet needs should be met &quot;where it is reasonable to do so and consistent with achieving sustainable development&quot;. It is highly questionable whether WODC's plans for Eynsham are either reasonable or sustainable. WODC (and Eynsham) could instead offer to take on some of the burden (out of a duty to cooperate), while ensuring that it did not interfere with local housing and other needs, or damage local quality of life. Make a reduced offer. |
| MM741        | CPRE Oxfordshire Helen CPRE Oxon | Mrs Marshall | 1440 |  | &gt; SECTION 1 - INTRODUCTION &gt; MAIN 1 | It is important to understand that the SHMA is representative of only one version of the future, which may be unlikely. It should not be considered as an absolute and used to justify applications that will do significant harm. Therefore, CPRE would encourage an early review in case CPRE's concerns that the target is too high prove founded. The review should exclude an upwards adjustment, but consider whether the target does exceed the demand and need, as suspected by CPRE and indeed many. CPRE suggests an earlier review than the 5 year timeframe suggested in clause 1.7. Should the target prove to be above the need, then 'spare' allocations without permission could be dropped or carried over to the next Plan Period to avoid unnecessary harm moving forward. For sure, sustaining this level of growth beyond 2031 will be difficult. |</p>
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<tr>
<td>MM69</td>
<td></td>
<td>Mugglewitch</td>
<td>Mrs</td>
<td>Sensicall</td>
<td>176</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>Shouldn’t the intro be specific about the organisations to co-operate with e.g. Transport plan of which there was little mention at the expo in Witney Corn Exchange. In fact it was evident that there was a conflict over the Woodford Way car park site. I’ll say this here in case there isn’t a space later. This plan suggests that this car park will be used for housing thus reducing car parking in the town when more houses are being built and potentially a threefold increase of traffic. The traffic plan does not take account of all these new housing requirements infrastrure. Housing and traffic should be working much more closely to resolve the situation for the future and ensure that Witney, as a small and vibrant market town isn't compromised. Your plan makes the latter impossible.</td>
</tr>
<tr>
<td>MM69</td>
<td></td>
<td>Mugglewitch</td>
<td>Mrs</td>
<td>Sensicall</td>
<td>182</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>Need to include traffic plan co-operation. At the moment the traffic/transport plan is inadequate.</td>
</tr>
<tr>
<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
<td>-</td>
<td>-</td>
<td>1847</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>MAIN 4 Para 2.9 states:  &quot;Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of ‘unmet’ housing need that Oxford City are unable to provide for within their own administrative boundary.&quot;  We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification. We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1, 2, 13, 14, 15, 17, 23, 24, 27.</td>
</tr>
<tr>
<td>MM1</td>
<td>CentralWitney</td>
<td>Dr</td>
<td>Garside</td>
<td></td>
<td>2</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>Due to the unprecedented changes in the national outlook resulting from Brexit, it would be sound to explicitly include a review of housing targets to be triggered once the Brexit negotiations are concluded and greater clarity on future economic growth are available.</td>
</tr>
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<td>MM771</td>
<td>Stormport (UK) Ltd</td>
<td>Stormport (UK) Ltd</td>
<td>-</td>
<td>Stormport (UK) Ltd</td>
<td>2035</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>Stormport support the need for a plan to be regularly reviewed to ensure that it remains relevant. However, the reference of a review ‘typically every 5 years or so’ brings into question the robustness of the plan and the guidance in paragraph 157 of the Framework that plans should have an appropriate timescale, preferably of 15-years. Is the reference to a plan review in circa 5 years an admission that the plan is failing to meet its statutory duty of providing the required number of homes?</td>
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<td>MM773</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>2068</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>We agree with the proposed modification wording to paragraphs 1.6 and 1.7 of the Plan. This offers clarity as to the role that Neighbourhood Plans will play within the Development Plan. Whilst we agree in principle with the amendments to paragraph 1.7 we believe this could be bolstered to provide greater certainty over the regular review period of the Local Plan. We would therefore recommend that the paragraph is amended to state: &quot;This Local Plan covers the 20-year period 1st April 2011 – 31st March 2031. It will however be reviewed on a regular basis to ensure it remains relevant and appropriate typically every 5 years.</td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2223</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>It would be appropriate to also mention Connecting Oxfordshire: Local Transport Plan 2015-31 in this list.</td>
</tr>
<tr>
<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr</td>
<td>Murray and Blackwell</td>
<td>2297</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>MAIN 1 – Paragraph 1.7 2.1. The landowners support the need for a plan to be regularly reviewed to ensure that it remains relevant. However, the reference of a review ‘typically every 5 years or so’ brings into question the robustness of the plan and the guidance in paragraph 157 of the Framework that plans should have an appropriate timescale, preferably of 15-years. Is the reference to a plan review in circa 5 years an admission that the plan is failing to meet its statutory duty of providing the required number of homes?</td>
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<tr>
<td>MM20</td>
<td>Sandy</td>
<td>Mrs</td>
<td>Hellig</td>
<td>23</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>In order to ensure purchasers of new homes are from Oxford (ie meeting Oxfords unmet housing need), strict measures need to be in the plan to ensure compliance.</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>516</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>MAIN 1, Para 1.6 Does not comply with duty to cooperate On the contrary, it appears that WODC is over-cooperating. Why should Eynsham bear the whole burden of meeting Oxford City's unmet housing needs? As the 'Notes to Accompany the Model Representation Form' say, these unmet needs should be met 'where it is reasonable to do so and consistent with achieving sustainable development'. It is highly questionable whether WODC's plans for Eynsham are either reasonable or sustainable. WODC (and Eynsham) could instead offer to take on some of the burden (out of a duty to cooperate), while ensuring that it did not interfere with local housing and other needs, or damage local quality of life. Make a reduced offer.</td>
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<tr>
<td>MM357</td>
<td>Tony Bovey</td>
<td>Mr</td>
<td>Bovey</td>
<td>661</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>I am enclosing comments on the Draft Plan as a local resident of Eynsham since 1976 and Oxon. since 1974. I live at 5 Chilbridge Road, Eynsham, Ox294BE. 1.3 &quot;Sustainable Development&quot; must be the key principle from which flows low/nil energy housing, travel, employment, and conservation and equity. The generality of principle must be specifically and robustly defined</td>
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and applied through local plan policies: for example, community democracy, Eco housing, travel by non car modes, high density housing to support public transport, green infrastructure (e.g. allotments), suitably rewarded employment, and pedestrian and cycle networks. The Draft Plan seeks, in principle, most of these injunctions.

1.11 Growth Board and generation of Housing Need allocations through the SHMA.

There are significant doubts about the methodology, assumptions, economic bias and democratic control underlying the aggregate county housing "need" and allocation between Districts.

Public participation is a crude ideological sham if the underlying housing and employment targets are not subject to public contribution, review and challenge at local plan public inquiry. How can the institutional bias and methodological weaknesses be subjected to rigorous evaluation?

The Plan's housing figures appear not to be objectively modelled forecasts, but economic value judgements of employers and developers. How can the posited housing need be twice as large as the previous transparently modelled forecasts of government offices?

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<td>MM374</td>
<td>Carillion Capita</td>
<td>Jeremy Flawn</td>
<td>Mr</td>
<td>Flawn</td>
<td>718</td>
<td>&gt; SECTION 1 - INTRODUCTION &gt; MAIN 1</td>
<td>OCC P&amp;F supports the production of an Area Action Plan for Eynsham but seeks further clarification of what the AAP will entail.</td>
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<td>Commercial Estates Group</td>
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<td>Commercial Estates Group</td>
<td>1222</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 20</td>
<td>MIN 20 Paragraph 2.50&lt;br&gt;In the SWOT table below paragraph 2.50 of the Local Plan, the Council identifies within the ‘Challenges’ section:&lt;br&gt;&quot;the delivery of historically high, for West Oxfordshire, housing targets given the local track record of the development industry&quot;. &lt;br&gt;We do not dispute the fact that meeting the housing needs of the District moving forward requires a materially higher level of housing delivery than has historically been the case (a low level of provision that has resulted in increases to the house price to income ratio, a ratio that was already much higher than the national average).&lt;br&gt;However, the above statement suggests that the problem of low housing delivery levels is the fault of the development industry. This is wholly unjustified and ignores the Council's fundamental role in this lack of delivery.&lt;br&gt;In a relatively high value area such as West Oxfordshire, developers want to build. This was demonstrated by the number of developer participants at the Local Plan Examination in November 2015. The primary reasons for low levels of historic housing delivery relate to the Council's failure to put in place an up to date Local Plan, and its consistent refusal of residential planning applications at the local level in wholly sustainable and appropriate locations (applications which are delayed substantially and then allowed at appeal). The Council must accept that it is part of the problem and work with the development industry, not blame it.</td>
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<td>MM69</td>
<td>Mugglewitch</td>
<td>Mrs Sensicall</td>
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<td></td>
<td>190</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 9</td>
<td>The developers are usually unable to provide affordable housing as they're profits are affected. Even so called affordable housing can't be afforded by the people on low incomes who need them most.</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td></td>
<td></td>
<td>518</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 9</td>
<td>MIN, Para 2.19 Not sound&lt;br&gt;Surely WODC's priority should be to meet the needs of 1,440 households on the waiting list for affordable housing (given that 'even the cheapest properties in West Oxfordshire are around 10 times the lowest incomes')? The high financial value of land and housing will attract developers, but will they be interested in the reduced profits of affordable housing, and will the low-income households have any more chance of affording properties that will still be a minimum of 5 times their income?</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>137</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 10</td>
<td>Yes, the new statistics prove that WODC has a &quot;strong and resilient local economy&quot;. So why so much emphasis on economic growth? The District will not suffer from having lower growth; and there is a case to be made that it cannot absorb too much more growth too quickly without a substantial deterioration in quality of life (aspects of which, such as air quality, are already evident). Furthermore, in the wider national context, it is the poorer parts of the country that have a far greater need of investment for growth and employment. The South should not be so greedy.</td>
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<tr>
<td>MM21</td>
<td>Thoughtful</td>
<td>Mr</td>
<td>Reese</td>
<td>30</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 10</td>
<td>It should be added that: &quot;This demonstrates that West Oxfordshire is NOT in need of further economic growth and is already economically vibrant.&quot;</td>
<td></td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>520</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 10</td>
<td>MIN, Para 2.20 Not sound Yes, the new statistics prove that WODC has a 'strong and resilient local economy'. So why so much emphasis on economic growth? The District will not suffer from having lower growth; and there is a case to be made that it cannot absorb too much more growth too quickly without a substantial deterioration in quality of life (aspects of which, such as air quality, are already evident). Furthermore, in the wider national context, it is the poorer parts of the country that have a far greater need of investment for growth and employment. The South should not be so greedy.</td>
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<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>138</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 11</td>
<td>It is indeed too soon to understand the implications of Brexit. For example, UKTI's February 2016 report on &quot;UK Financial Centres of Excellence&quot; noted that the &quot;financial and related professional services&quot; sector accounts for 11.8% of GDP and employs over 2 million people, two-thirds of them outside Greater London. Exports account for 37% of the sector's contribution to GDP, and 40% of the sector's tax receipts come from international firms who have their European base in the UK. It is too soon to say whether the sector will emerge from Brexit stronger or weaker, but given the potential loss of revenue for the UK, and hence for public spending, if things go badly, would it not be more sensible to wait at least until after Article 50 is triggered, and preferably for another year or so, before making long-term financial commitments of this kind?</td>
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<tr>
<td>MM21</td>
<td>Thoughtful</td>
<td>Mr</td>
<td>Reese</td>
<td>31</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 11</td>
<td>It should be added that: &quot;This demonstrates that further demographic growth is clearly not required to derive economic growth&quot;.</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>521</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 11</td>
<td>MIN, Para 2.22</td>
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It is indeed too soon to understand the implications of Brexit. For example, UKTI’s February 2016 report on ‘UK Financial Centres of Excellence’ noted that the ‘financial and related professional services’ sector accounts for 11.8% of GDP and employs over 2 million people, two-thirds of them outside Greater London. Exports account for 37% of the sector’s contribution to GDP, and 40% of the sector’s tax receipts come from international firms who have their European base in the UK. It is too soon to say whether the sector will emerge from Brexit stronger or weaker, but given the potential loss of revenue for the UK, and hence for public spending, if things go badly, would it not be more sensible to wait at least until after Article 50 is triggered, and preferably for another year or so, before making long-term financial commitments of this kind?

CPRE feels that the focus in Carterton should be to strengthen the core of the town. Therefore, CPRE is supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across the 2 sites. Therefore, CPRE supports clauses 9.3.5-9.3.6, 9.3.36 & 9.3.50.

However, the REEMA areas cover 146 acres in total. The last information from the MOD indicated that 742 SFA homes are needed, which at the usual JSP density of 12 per acre, will require 62 acres, leaving 84 acres spare. North and Central areas cover approximately 70 acres (22 at REEMA North and 48 at REEMA Central), so the allocation of 300 houses in addition to the existing 200 is modest, even accounting for some retail or leisure land. CPRE also feels that there is likely to be potential in other REEMA areas in the town and it now appears that past claims of increasing housing need generated by RAF Brize Norton were unfounded. The existing houses are at an approximate density of 6 homes per acre, as they are not well-planned.

Therefore, no further expansion of the town should occur until these sites achieve their potential and any future development in Carterton should be focused at REEMA. It is clearly preferable to development on open countryside and CPRE agrees with WODC that it will improve the style and image of the town. It is development that would lead to clear betterment and would be likely to be well supported in the community. In line with the need, mostly apartments and small homes should be built, with a few larger gateway properties for kerb appeal. Some housing for the elderly would be beneficial. That means that the density could be relatively high, in line with most town centre developments. It would not be unreasonable to expect a density of 20-30 per acre or 50-75 per ha to be achieved in line with other mixed developments in the area, giving a total potential of at least 1,680 homes in REEMA North and Central areas alone, based on 50 units per ha.

In fact, Carterton has the least infrastructure and facilities of the three main towns and lags behind in terms of employment opportunities, as noted in the Draft Local Plan clauses 2.26, 9.3.10, 9.3.39 & 9.3.42. There is a pre-existing imbalance between numbers of jobs and homes/workers, meaning that out-commuting is high. It’s the furthest from Oxford and has no A road access. There is mention in 9.3.15 and 9.3.67 of upgrading the B4477 in Brize Norton to an A road at a cost of £3.9M, but clauses 7.48 & policy T2 are vague...
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<td>MM69</td>
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<td>Mugglewitch</td>
<td>Mrs</td>
<td>Sensicall</td>
<td>193</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 13</td>
<td>about funding. It appears that there is no firm commitment or allocated funding. It is not clear either where the £7.2M for westbound slips onto the A40 will come from at Minster Lovell. Carterton should not therefore be seen as the obvious place to put any houses that other areas do not want, as has been suggested by some. If a significant number of houses were moved from Witney to Carterton, Carterton would encounter significantly more growth per capita than Witney. Carterton could not sustain such growth without further major incursion into open countryside in neighbouring parishes (over and above that already caused by Shilton Park, Carterton North and Carterton East in Brize Norton and Shilton Parishes), which CPRE considers unacceptable.</td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2231</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 13</td>
<td>The majority of out-commuters (7,500) travel to Oxford City, with most travelling by car.</td>
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<td>MM455</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
<td>1221</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 14</td>
<td>MIN 14 Paragraphs 2.30-2.33 Paragraphs 2.28-2.33 summarise transport matters in the District generally. Reference is made to the relationship of the District with Oxford city and the two main rail lines (the Cotswold Line and the Cherwell Valley Line). In terms of bus provision, reference is made to Witney and Carterton together with the good services in the ‘Woodstock area’. We assume that the reference to ‘the Woodstock area’ is intended to refer to the Eynsham – Woodstock Sub-Area as defined in the Local Plan – an area that also includes the Rural Service Centres of Long Hanborough and Eynsham, with the former providing not only good access to bus services but also access to Hanborough Station, one of the largest and the most well-used stations in the District providing services to Oxford and beyond. On this assumption, paragraph 2.32 should be amended accordingly for the purposes of clarity and consistency with the Council’s own evidence.</td>
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2.29. It must be clarified that commuters travel by car to all parts of the Oxford city conurbation, and not all to the city centre. Travel by car is the only realistic option for many commuters because there is no likelihood of direct public transport to major employers, such as the hospitals for example.

2.30. NB. The Cherwell valley line barely skirts the WODC region and should be discounted from this plan. It is not relevant. Trains on it at infrequent and not suitable for any form of regular commuting.

2.31. The Cotswold line is operating close to full capacity at peak times, and regularly operates as standing room only. Given the single line nature there is no capacity for additional frequency. The likelihood of any line upgrade before 2031 is almost completely impossible. Even before the chancellor’s autumn statement of 2016 the electrification of the main line from Paddington even as far as Oxford was severely delayed until at least 2024, and now we know that there is no money available for other works to other regional lines. Travelling the 20minutes journey through already heavily congested roads to Oxford Parkway will achieve one thing. Even worse congestion and further damage to air quality.

2.32. Therefore any and all further housing might best be considered close to the main bus stations in Witney or Carterton, or otherwise considered unsustainable.

It is of note that clause 2.40 indicates that road deaths and injuries are worse than the national average in West Oxfordshire, indicating that we have a higher than average number of accident blackspots / junctions that are dangerous.

Although the 'Older Persons' sub-section within Section 5 ‘Providing New Homes’ identifies that West Oxfordshire has a rapidly ageing population (at 25.8% the percentage increase in the number of older people in West Oxfordshire between 2001 and 2011 was over double the national average of 11% - ONS, 2001 and 2011 Censuses) this is not mentioned within the ‘Health and Well-Being’ sub-section in ‘West Oxfordshire in 2016’.

As the Director of Public Health Annual Report 2016 identifies the growth in the number and proportion of older people in the population as the biggest challenge to health and to services in Oxfordshire it is strongly recommend that this is included within 'Health and Well-Being' sub-section in 'West Oxfordshire in 2016'.

In addition to promoting lifetime homes developers should also be asked to consider how high quality public space can help people to maintain their independence into older age e.g. safe and convenient walking routes to local facilities and amenities with level non slip surfaces, benches and good natural surveillance etc.

2.1 As set out in the supporting settlement hierarchy to the policy the top tier of settlements
2.2 We continue to support the Council's settlement hierarchy in this respect. The Policy itself advises that:

"A significant proportion of new homes, jobs and supporting services will be focused within and on the edge of the main service centres of Witney, Carterton and Chipping Norton. A number of site allocations are proposed to ensure needs are met. Further allocations may be made through Neighbourhood Plans."

2.3 We support the recognition that Chipping Norton is a suitable location to accommodate additional development. The Council's updated Settlement Sustainability Report (November 2016) which is published in support of the consultation classifies Chipping Norton as the second most sustainable settlement in the District (weighted and unweighted).

2.4 Our comments in relation to Chipping Norton itself are set out with regards to the section of the Plan dealing with the Chipping Norton Sub-Area itself and as such are not repeated here.

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<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1109</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 19</td>
<td>Historic England welcomes and supports the amendments to paragraph 2.49 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
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<td>Commercial Estates Group</td>
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<td>-</td>
<td>Commercial Estates Group</td>
<td>1220</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MIN 9</td>
<td>We support the amendment to paragraph 2.19, to update matters in terms of housing affordability ratios in West Oxfordshire District. It can be seen that an already very high house price to income ratio of 9.89 in West Oxfordshire in 2011, has by 2015 increased to a ratio of 10.35 (which compares to the already high national average ratio of 7). This confirms not only that West Oxfordshire has significant and currently unaddressed issues of affordability but that affordability issues have been getting materially worse in recent years. These figures emphasise the need, amongst other things, for significant higher levels of housing delivery in the District.</td>
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<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>136</td>
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<td>Surely WODC’s priority should be to meet the needs of the 1,440 households on the waiting list for affordable housing (given that “even the cheapest properties in West Oxfordshire are around 10 times the lowest incomes“)? The high financial value of land and housing will attract developers, but will they be interested in the reduced profits of affordable housing, and will the low-income households have much more chance of affording properties that will still be a minimum of 5 times their income?</td>
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| MM455      | Commercial Estates Group| Commercial Estates Group | - | Commercial Estates Group | 1108 | > SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 3 | Paragraph 2.5  
As identified within our detailed representations to Policy OS2, we object to the removal of Long Hanborough as a Rural Service Centre. This change is wholly unreasonable, unjustified and is not supported by the Council's own evidence and is, therefore, demonstrably unsound.  
Paragraph 2.5a  
We do not object to the proposed allocation of the new Garden Village at Eynsham as a matter of principle. However, as set out in more detail in our more detailed representations to Policy OS2, the downgrading of Long Hanborough to a 'Village' is not justified by any available facts or evidence. The Council's position seems to be that there can only be a finite number of Rural Service Centres and, accordingly, that the proposal that the new Garden Village should, in time, become a Rural Service Centre somehow requires the downgrading of an existing Rural Service Centre. This is clearly flawed logic. There can of course be as many Rural Service Centres as meet the Council's relevant criteria as set out in its Settlement Sustainability Reports. Even if there were only a finite number (which is clearly wrong), as set out in our representations to Policy OS2 logic would clearly dictate that the Rural Service Centre to be downgraded would be that identified by the Council to be the least sustainable i.e. Bampton. |
| MM741      | CPRE Oxfordshire         | Helen CPRE Oxon | Mrs          | Marshall          | 1455     | > SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 3 | The A40 has undergone improvements, but queueing starts way back from the Wolvercote roundabout, so CPRE doubts whether the extra traffic from the planned development at Eynsham as noted in clauses 2.5a & 2.9, on top of the 18% of workers elsewhere in the District in existing and new households, can be accommodated. It is not clear within OCC's current consultation on the bus lanes and park & ride at Eynsham, whether the full planned growth in West Oxfordshire is accounted for as detailed figures are not provided. It is of note that OCC's consultation paper clarifies on p.14 that even with the improvements, car queueing time will not reduce, because traffic increases match improvements. We will therefore be no further forward. |
| MM722      | Graham Flint             | Mr             | Flint          | 1643              | > SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 3 | The proposal to remove Long Hanborough from the Rural Service Centres and designate it as a village is unsound for the following reasons:  
1. Its long history as a Service Centre  
Long Hanborough has been designated as a Service Centre for a long time. It is designated as a Service Centre in the West Oxfordshire Local Plan 2001 - 2011 (Figure 5.2) and was proposed to be designated as a Rural Service Centre in the submission West Oxfordshire Local Plan 2031 (Table 4.1.). The National Planning Policy Framework (NPPF) requires that 'the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence,' (para 182) and the Council has long accepted that there is sufficient evidence to justify the designation of Long Hanborough as a Rural Service Centre. |
2. Wide range of services and facilities

There is ample evidence that Long Hanborough has a wide range of services and facilities and therefore merits its Rural Service Centre status. These include a new spacious doctors’ surgery for which planning permission was obtained in July 2016 and which will be provided as part of the residential development on the land south of Witney Road granted planning permission under appeal ref: APP/D3125/W/15/3129767. The new doctors’ surgery is required to be provided under conditions 15 & 16 of the permission within 2 years of commencement of the development and to remain in that specified use. This will replace the current cramped doctors’ surgery, which is well below NHS England standards of provision for the population it serves, and not only improve facilities for existing residents, but also provide the capacity for the provision of more homes in Long Hanborough. Other services and facilities include a primary school; petrol station; churches; post office; two Co-op food stores; dental practice; playing fields; spacious village hall; nursery; beauty salon; two public houses; fish and chip shop; substantial employment estate (circa 10.72 hectares) and a mainline train station (the Cotswold Line).

3. Close relationship to the Oxford and Oxfordshire City Deal and the 'Knowledge Spine'

A key part of the case for Long Hanborough to remain as a Rural Service Centre is its close relationship to the City Deal. The Oxford and Oxfordshire City Deal is part of the Government’s initiative to devolve powers locally in exchange for local authorities taking on responsibility for creating economic growth in their areas. The Oxford and Oxfordshire City Deal aims to promote growth by maximising the existing educational, pharmaceutical and science assets in order to promote Oxford and Oxfordshire’s status as a prosperous economic area.

The City Deal, is a cooperative venture, which will be delivered through the Oxford Local Enterprise Partnership (LEP) bringing together other bodies and institutions, including Oxford City Council, Cherwell District Council, South Oxfordshire District Council, Vale of the White Horse District Council, West Oxfordshire District Council, Oxfordshire County Council, Oxford Brookes University and Oxford University. The area of the City Deal is County wide.

The proposed development at Long Hanborough is very close to the ‘Knowledge Spine’ identified in the City Deal, which stretches from Science Vale, near Didcot to Bicester, with Oxford at its heart. Paragraph 9.5.11 of the Local Plan acknowledges this, stating that the proximity of the Eynsham-Woodstock sub-area to major employment growth areas ‘present a diverse range of opportunities within close distance including within the Oxfordshire knowledge spine suggesting the Eynsham Woodstock area has a positive role to play in terms of economic development.’ Two key proposed employment sites that are close to Long Hanborough, and which housing there would help to serve, are the Science Park at Begbroke, which Cherwell District Council has identified in its Local Plan 2011 - 2031 (adopted July 2015) policy Kidlington 1 for Accommodating High Value Employment Needs and the Northern Gateway, which adjoins the A44 at the northern edge of Oxford, which Oxford City Council has allocated in its Northern Gateway Area Action Plan (adopted July 2015) policy NG2 for up to 90,000 m2 of employment uses that directly relate to the
knowledge economy and include science and technology; research; bio-technology; and spin off companies from the universities and hospitals.

The City Deal commits the participating local authorities to accelerate the delivery of 7,500 homes across the county; and recognizes that the provision of quality housing close to the employment areas is fundamental to the delivery of innovation led growth.

The importance of housing provision to the achievement of the objectives of the City Deal is emphasized in the section on 'Planning for Development;' that states: 'The City Deal should enable further economic growth. However, this success has placed pressure on the local housing market. Oxford and Oxfordshire have overwhelming evidence that the lack of choice and availability of housing and affordable housing is a major barrier to growth. Oxford and other areas in the county are identified as among the least affordable locations in the country, and significantly ahead of London. The universities and businesses in the knowledge economy identify that housing is a significant barrier to the recruitment and retention of staff, including senior management and researchers. More housing is essential for the future of the knowledge economy in Oxford and Oxfordshire. City Deal partners recognise that a more strategic and ambitious approach towards housing growth is essential to the future of the knowledge economy in Oxford and Oxfordshire, and will ensure that the area continues to be a dynamic place to invest and work.

The proximity of Long Hanborough to the 'Growth Spine,' and its ability to contribute to the City Deal further emphasizes the importance of it continuing to be designated as a Rural Service Centre.

4. Recent Rail Improvements & Further Improvements Detailed in the Main Modifications will enhance Long Hanborough's role as a Rural Service Centre

There is therefore absolutely no evidence to demonstrate that it should be downgraded to village status. In fact, the service centre role performed by Long Hanborough has improved in recent years due to the improvements that have taken place in the rail service with further improvements proposed.

The presence of the train station at Long Hanborough is virtually unique in West Oxfordshire. None of the three main settlements of Witney; Carterton and Chipping Norton has a train station and the only other service centre which has one is Charlbury, which is located within the Cotswolds Area of Outstanding Natural Beauty (AONB) where development is therefore constrained in accordance with the advice in the National Planning Policy Framework (paragraphs 115 - 116). At Long Hanborough there is a regular direct train service to Oxford, Didcot, Reading, Slough, London and Worcester with the journey to Oxford only taking ten minutes. This is of particular significance, as paragraph 9.5.34 of the Submission Local plan acknowledges that the Eynsham/Woodstock sub area, within which Long Hanborough is located, has 'very strong linkages with Oxford, with a high proportion of residents working in the city and much of the economic activity forming part of the wider Oxford city region economy.'

The proposed main modification 66 reinforces the importance of the Hanborough train station with paragraph 7.57(a) stating that: 'passenger growth on the Cotswold line has been significant with exceptional
growth at Hanborough (up 239%). It states that ‘There is the potential for further growth with the introduction of an hourly service in December 2018. New trains will bring increased capacity with additional seating and will also achieve faster journey times, with some services from Hanborough reaching London Paddington in 63 minutes.’

There are also proposals for further improvements with paragraph 7.57 (b) stating that:

‘LTP4 identifies a strategic aspiration to develop Hanborough Station as a transport hub to help reduce congestion on the A40 as part of an overall package of public transport measures. To fulfil its potential, the station will require a larger car park, footbridge and new platform so any trains extended from Oxford can terminate and turnaround. To fully realise the potential of the railway, further redoubling will be required at the eastern and western ends of the line, between Wolvercote Junction and Hanborough, and from west of Evesham towards Pershore. This would allow up to three trains per hour to Hanborough and/or Char/bury and two trains per hour between London and Worcester, with a journey time under two hours.’

These points are also reiterated in paragraph 9.5.16 which refers to Hanborough station as being ‘one of the District’s largest and most well-used stations. Car parking facilities have recently been expanded at Hanborough to improve capacity and there are aspirations for further station improvements,’ and then goes on to repeat the improvements outlined in paragraph 7.57 above.

Paragraph 9.5.34 also states that: ‘there is potential to develop Hanborough Station as a stronger transport interchange, with additional parking, and improved access from the south.’

These improvements will further improve the sustainability of Long Hanborough and mean that it is far more accessible by public transport, particularly to Oxford, than any other service centre in West Oxfordshire, apart from Charlbury, which is in the AONB. This constant reiteration in the Main Modifications of the importance of Hanborough station and the further improvements planned for it, prove that Long Hanborough certainly merits its designation as a Rural Service Centre.

The proposed Main Modifications, however, go on to state in paragraph 7.57c that:

‘In light of the proposed improvements to Hanborough Station a key element of the proposed garden village to the north of Eynsham will be the provision of improved connectivity between the new settlement and the station particularly by bus and cycle.’

Given, that Long Hanborough is located adjoining the station there is already excellent connectivity with the train station, with a pedestrian and cycle path through the settlement providing access to it. It is also located closer to the station than the proposed garden village. With the recent and proposed improvements to the station it therefore clearly performs the role of an important transport hub and should retain its status as a Rural Service Centre.

5. Scoring in the West Oxfordshire Local Development Framework Settlement Sustainability Report
The Council has prepared a Settlement Sustainability Report (November 2016), which gives weighted and unweighted scores. In both Hanborough scores above all of the villages, scoring the same as the Rural Service Centre of Bampton and 2 points more than Bampton in the Weighted Score. However, Long Hanborough’s position as a Rural Service Centre is even more significant than this indicates as there are three different positive indicators for a bus service which are:

- Daytime bus service;
- Evening bus service;
- Bus service every 30 minutes

However, for the train there is only one score for a railway station in the parish. At Hanborough Station there is an evening train service, with the last train arriving at 23.02. The train also only takes 10 minutes from Oxford station, giving Hanborough a high level of accessibility, so the rail service clearly merits a higher score than the unweighted score of 1 or the weighted score of 2.

With regard to the weighted score, there is a strong argument that having a railway station in the parish should result in a weighted score of 4 being given, as is the case where a Post Office; Shops; Primary School; Doctors’ Surgery and Local Employment Opportunities are present.

6. The Planning Inspector Philip Asquith who considered the appeal into the proposed residential development and doctors’ surgery on land south of Witney Road, Long Hanborough considered that Long Hanborough merited designation as a Rural Service Centre

The Inspector who determined the planning appeal relating to land south of Witney Road, Long Hanborough, (APP/D3125/W/15/3129767 & 12/1234/P/OP) also considered Long Hanborough to merit the designation as a Rural Service Centre, stating that:

49. ‘Long Hanborough is one of the nine larger settlements in the district classified in the WOLP as Service Centres. These, by definition, have a good range of facilities, services and transport accessibility to support their immediate communities as well as neighbouring hinterlands. This is confirmed by the Council’s Settlement Sustainability Report, revised in December 2013. The village is also defined as one of six Rural Service Centres within the emerging Local Plan 2031. The Statement of Common Ground between the appellant and the Council notes that Long Hanborough is a suitable location to accommodate significant residential growth. There is a range of local services, including a small business park adjacent to the station, which allows a proportion of travel demand (alternative to the car) to be met locally.’

50. The village is one of two settlements within the category of Main Towns and Rural Service Centres in the district to have a mainline station. The rail line provides direct services to London, Oxford, and Worcester.
...... It is apparent that there is a commitment to the introduction of new trains with greater capacity, with a longer-term commitment to increase the number of trains from Long Hanborough to Oxford, cut journey times to London and undertake enhancements to the station's facilities.'

Counter Arguments

There is therefore abundant evidence that Long Hanborough merits its Rural Service Centre designation.

There are two arguments against its designation which are the Council’s statement in paragraph 9.5.3a that:

‘Given the residential schemes of 169 homes and 50 homes recently approved, the limited role of the settlement and its landscape setting, it is only suitable for very modest levels of further development.’

The other being the argument made in the officers’ report to Council on the 26 October 2016, (paragraph 5.9), that the proposed designation of the West Oxfordshire Garden Village would mean that there would be too many Rural Service Centres in this part of Oxfordshire.

 Neither of these arguments is considered to be a valid reason to remove Long Hanborough’s status as a Rural Service Centre. In the first place the Council is itself proposing in the main modifications to designate two additional sites at Long Hanborough for residential development, these being land at Myrtle Farm, Long Hanborough for 50 homes under policy EW1 f and the other being land at Oliver’s Garage, Long Hanborough for 25 dwellings under Policy EW1 g. There is also land north of Witney Road, Long Hanborough, which is on the opposite side of the road to the 169 dwellings granted approval on appeal, which could be allocated for residential development without a significant impact on its setting, as the issues are very similar to those relating to the land south of Witney Road. (Further consideration is given to this issue in the representations submitted in relation to Main Modifications 27; 160; 170; 171; 172, 173, 174 & 175 seeking the designation of this site.) It is therefore not considered to be true that Long Hanborough ‘is only suitable for very modest levels of further development.’

With regard to the argument with regard to the proximity of the West Oxfordshire Garden Village, this argument is made in the officers’ report to Council on the 26 October 2016 which stated in paragraph 5.9 that:

It is recommended that the proposed Garden Village should be identified as a future rural service centre. The Garden Village would then replace Long Hanborough which would no longer be a defined rural service centre. This reflects the significant scale of development proposed in the Garden Village, the key role it will play as a transport and business hub, and the relatively limited scope for further development in Long Hanborough. It also avoids an over concentration of rural service centres in this part of the District.

However, there are two reasons why it should not replace Long Hanborough as a Rural Service Centre. One is that the proposed Garden Village site currently consists of fields, with no services and facilities and is not therefore a Rural Service Centre. Indeed, given the significant planning issues; funding and infrastructure
that is required for a new settlement, the West Oxfordshire Garden Village may never come to fruition or may develop much more slowly than currently envisaged and so not perform a Rural Service Centre function during the entire plan period. Even on the most optimistic trajectory it is clear that it will not perform the role of a Rural Service Centre for many years.

Secondly it will effectively form an extension to Eynsham. Indeed, paragraph 9.5.40r of Main Modification 153 states that:

‘By ensuring good links across the A40 (e.g. an iconic feature bridge as suggested in the Council’s Garden Village expression of interest) existing residents of Eynsham to the south will be able to access the Garden Village to enjoy the services, facilities and amenities it will offer. Conversely, residents of the Garden Village will be able to access Eynsham and its services and facilities, thereby playing a complementary rather than a competing role.’

It will therefore effectively form an extension to Eynsham, in the same way that other settlement extensions such as the Littlemore Science Park and Blackbird Leys or Barton form part of Oxford, notwithstanding their separation from other parts of the city by the A4142 and the A40 respectively.

Indeed, by designating it as a separate Service Centre means that there would be two contiguous Service Centres. It makes much more sense to have Eynsham and the proposed Garden Village as one Rural Service Centre and Long Hanborough as another, as Long Hanborough serves a different area of the District to Eynsham.

**Conclusion**

For the reasons set out above it is considered that Long Hanborough is a highly sustainable location for development and therefore the designation of Long Hanborough as a Rural Service Centre, as proposed by the Council in the original submission West Oxfordshire Local Plan 2031 ‘is the most appropriate strategy when considered against the reasonable alternatives’, (NPPF, para 182) based on the Council’s own evidence base and that it would be wrong for it to be downgraded to a village.

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<td>Gladman Developments Limited</td>
<td>Richard House (Gladman)</td>
<td>Mr</td>
<td>House</td>
<td>1788</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 3</td>
<td>2.1 It is proposed that Long Hanborough should no longer be designated as a Rural Service Centre but should be reclassified as a Village. Long Hanborough has a population of 2,400, has a good range of services and facilities and importantly has a railway station on the Cotswold Railway line providing access to Oxford and London. The Local Plan proposes two housing allocations within the settlement for 50 and 25 dwellings respectively and there is an existing planning permission for 169 dwellings. Gladman considers that Long Hanborough is an eminently sustainable settlement (one of the few in the District with a train station) which has the capacity to accommodate further growth and that there is no logical reason for it not to be classified as a Rural Service Centre.</td>
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<td>OXFORDSHIRE IN 2016 &gt; MAIN 3</td>
<td>We do not believe that the Garden Village proposal at Eynsham is an appropriate measure for delivering the unmet need for Oxford. It is based on an ambitious timescale for delivery and given that the Government’s announcement for the results of Garden Village proposals has not yet been announced (MAIN 17 references an application for funding), it is unclear how and whether the council will be able to deliver the scheme if the site is not selected of the Locally-led Garden Villages. The anticipated delivery numbers in the bid document are also unrealistic. It would be more appropriate to deal with the objectively assessed need and allocate development to settlements that can deliver homes across the plan period in a more effective manner. MAIN 3, 9, 15, 16, 17, 23, 24 and 27 should be reconsidered and amended accordingly.</td>
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<td>OXFORDSHIRE IN 2016 &gt; MAIN 3</td>
<td>Proposed modification- Downgrading of Long Hanborough: The proposed modifications involve the downgrading of Long Hanborough from a service centre, to a lower order village. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN13, MAIN14, MAIN15, MAIN59, MAIN66, MAIN145, MAIN149. Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. We object to proposed modifications which suggests the downgrading of Long Hanborough from a rural service centre to a village. The submission plan confirmed the rural service centres were classified as such because they benefitted from a range of services and facilities which supported the village and surrounding area. They are able to support additional homes in the short-term, while proposed growth can enhance the role of the settlement in supporting the surrounding rural area (paragraph 4.18). This approach was directly in line with the plan’s objective 1 ‘strong market towns and villages’ and objective 4 ‘sustainable communities with access to services and facilities’, both of which remain un-modified. Long Hanborough retains the same services and facilities which existed at the time the plan was submitted, furthermore planning permission has been granted which allows significant expansion of the primary school (15/03341/FLU). While additional housing has been permitted no evidence has been produced to suggest additional homes would result in any harm to the character or sustainability of the settlement. The village therefore remains well placed to fulfil the role of a rural service centre.</td>
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The downgrading of Long Hanborough proposed through modifications is largely unexplained and not supported by any evidence. The Council cite the creation of a ‘new’ service centre through the northern expansion of Eynsham as justifying the downgrading of Long Hanborough as the new development will need to “develop a critical mass of services and facilities” (paragraph 2.5a).

We are concerned the Council’s explanation suggests an intention to restrict the development of Long Hanborough and reduce services in the village in order to encourage their replacement in the new development. A restrictive approach to development stifling an existing sustainable settlement and vibrant community is clearly at odds with the Plan’s vision, policies of the NPPF and good planning practice.

The provision of an additional service centre would be entirely in line with the Plan objectives. If the development proposed north of Eynsham is to proceed it is clearly preferable that Long Hanborough maintains its status as a service centre complementing any new facilities created. The need to retain the service centre is particularly pronounced due to the unclear deliverability of the proposed site north of Eynsham, even if the site is delivered this will not be until the latter part of the plan period, therefore there is a need for services and facilities in the interim.

The submitted plan set out clear objectives which the following policies sought to deliver sustainable communities. The Council seeks to deviate from this approach without explanation, evidence or proper assessment, we therefore believe this modification should be deleted.

Proposed modification - Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.

The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making.

The proposed ‘Garden Village’ is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification.

The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation.
process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process.

A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.

Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.

Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.

MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.

MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.

MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document.

The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have
The published housing supply position paper sets out the Council's assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.

The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.

While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.

MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.

We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council's own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.
Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.

MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.

The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.

MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of
Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPF’s encouragement of environmentally sustainable development.

The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use altogether. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.

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<td>AJ04</td>
<td>Mr Bickley</td>
<td>211</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 3</td>
<td>2.5a is a major change to the plan compared to previous versions - I would expect at least an explanation as to why a new rural service centre north of Eynsham has suddenly appeared as the preferred option, without consultation before the application to Government was made.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2277</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 3</td>
<td>Para 2.5 Long Hanborough should be included in the Plan as a rural service centre. Long Hanborough has its own facilities and institutions, has fairly good bus links to Witney and Woodstock, and significantly has a railway station, all of which create conditions for allocated residential development, ideally bridging the gap between the railway station and the village centre. The proposed Garden Village to the north of Eynsham is between 2-3 miles (depending on exact location) to Hanborough rail station, which is above comfortable walking distance for most people but acceptable for journeys by bicycle. The new Eynsham Garden Village connects with the A40 transport corridor, and particularly to bus routes to Oxford, both along the A40 and along the B4044 routes to Oxford and its rail station. It will be challenging to provide meaningful bus connectivity between the Eynsham Garden Village and Hanborough station, as there is no basis for a commercial bus service between these points. Conversely Long Hanborough residents can walk to Hanborough rail station, which is their natural rail-head, in exactly the same manner as in Charlbury.</td>
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<tr>
<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>2299</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE</td>
<td>2.3. The landowners object to the demotion of Long Hanborough from being a Rural Service Centre, this will</td>
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<td>Gareth Hammond</td>
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<td>Goodwin</td>
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<td>Tony Bovey</td>
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It is not considered that the 2,750 homes is an agreed, reasonable and proportionate division of Oxford City needs given that between 15,000 and 18,000 homes are to be distributed across the four Oxfordshire Districts.

In addition, if the annual housing requirement (the Districts own housing needs together with Oxford City needs) do not include for past backlog, any calculation of housing land supply will need to factor in the backlog and due consideration will need to be given as to whether a 5% or 20% buffer should be applied on the basis of persistent underperformance.

Furthermore, as drafted the Plan does not reflect the latest position within the wider Strategic Housing Market Area in the context of the Duty to Cooperate. A Memorandum of Cooperation exists between all of the Oxfordshire Authorities in the context of having to meet the needs of Oxford City which cannot be accommodated within the city boundary. The Oxfordshire Growth Board have been tasked with identifying housing needs in Oxfordshire and then agreeing distribution across the authorities. The Plan for West Oxfordshire has been drafted on the basis of taking 2,750 houses in accordance with the Memorandum of Cooperation however South Oxfordshire have not agreed to their proportion of housing as confirmed at the Oxfordshire Growth Board meeting on 27th September 2016.

This is significant and goes to the heart of soundness for two key reasons:

Firstly, the Duty to Cooperate cannot be said to be met when one of the parties with whom West Oxfordshire are seeking to cooperate with are not in agreement on the strategy for distributing unmet housing need from Oxford City. This in itself indicates that the Plan for West Oxfordshire cannot be sound; and

Secondly, In terms of housing numbers, South Oxfordshire were recommended as part of the Duty to Cooperate to accommodate 4,950 houses from Oxford City. This compares with 4,400 houses for Cherwell District, 2,200 for the Vale of White Horse and 2,750 houses in respect of West Oxfordshire. Thus, it can be seen that South Oxfordshire have not agreed to take these housing numbers is far greater than had the situation arisen in Cherwell District, Vale of White Horse District or West Oxfordshire District.

The consequence is that objectively assessed housing need are not being met in the housing market area until such time as either South Oxfordshire reverse their position and accept 4,950 houses arising from Oxford City; or the remaining authorities agree to take additional housing to reduce the amount that South Oxfordshire have to accommodate, to such a level that South Oxfordshire are prepared to agree to the housing numbers to be delivered in their administrative boundary.

There is no resolution to this matter and no indication from the Oxfordshire Growth Board Meeting of 27th September 2016 as to the extent of housing from Oxford City that South Oxfordshire District are prepared
to accommodate. There is no alternative strategy available to the local authorities in Oxfordshire and no easy solution.

Such are the implications arising from the wider Housing Market Area it is recommended that further work on the West Oxfordshire Plan, including progressing further with the Examination be put on hold pending resolution of these key issues at the heart of Oxfordshire and the West Oxfordshire Plan.

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**MM751** Goldfield Estates  
Goldfield Estates  
-  
-  
1846  
> SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 4

MAIN 4 Para 2.9 states:

"Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of 'unmet' housing need that Oxford City are unable to provide for within their own administrative boundary."

We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification.

We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1. 2. 13, 14, 15, 17, 23, 24, 27.

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**MM762** N. Potter  
Unknown  
Potter  
1975  
> SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 4

Our client supports the modification of paragraph 2.9 which outlines that the Local Plan 2031 will now support additional housing provision to accommodate a proportion of unmet need arising from Oxford City. Our client agrees with the principle of reflecting such additional provision in the emerging plan to better align the thrust of emerging policies with the agreed outcomes of the recommendations of the Oxfordshire Growth Board. The proposed level of housing delivery in the District should not be considered an absolute maximum, but instead should be viewed as a minimum target to assist in delivery of identified housing requirements. The Main Modifications document would therefore benefit from clarification on this matter.

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**MM763** W & R Hutton  
Unknown  
Hutton  
1981  
> SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 4

Our client supports the modification of paragraph 2.9 which outlines that the Local Plan 2031 will now support additional housing provision to accommodate a proportion of unmet need arising from Oxford City. Our client agrees with the principle of reflecting such additional provision in the emerging plan to better align the thrust of emerging policies with the agreed outcomes of the recommendations of the Oxfordshire Growth Board. The proposed level of housing delivery in the District should not be considered an absolute maximum, but instead should be viewed as a minimum target to assist in delivery of identified housing requirements. The Main Modifications document would therefore benefit from clarification on this matter.

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**MM764** Oxford University and Colleges  
Oxford University and Colleges  
-  
1986  
> SECTION 2 - WEST OXFORDSHIRE IN 2016 >

Ensuring that adequate provision for meeting Oxford's housing need is fully made and in a location that is sustainable in its relationship to the city is of central importance to the University & Colleges in order to address the affordability crisis in the city that is giving rise to difficulties in the retention and recruitment of staff and adversely impacting the local economy. The amendment at paragraph 2.9 is therefore supported.
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| MM769         | Rivar Ltd               | Rivar Ltd       | Rivar Ltd        | Rivar Ltd         | 2013       | > SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 4 | Savills has been instructed by Rivar Ltd to submit written representations to the West Oxfordshire Local Plan 2031 Proposed Main Modifications document. These representations are made in respect of land at Marriott Close, Wootton-by-Woodstock.

The site at Marriott Close, Wootton-by-Woodstock comprises greenfield land to the west of existing built development. The existing development adjacent to the site is located outside of the main built up area of the village. Notwithstanding the site is well located to the village edge and represents a logical extension to the village. Planning history for the site is limited. Neighbouring land uses benefit from recent planning history for residential development at the adjoining site. The site has the benefit of positive previous pre-application advice relating to a similar proposal scheme sought from West Oxfordshire District Council in February 2015, and November 2016.

Rivar Ltd supports the modification of paragraph 2.9 which outlines that the Local Plan 2031 will now support additional housing provision to accommodate a proportion of unmet need arising from Oxford City. Our client agrees with the principle of reflecting such additional provision in the emerging plan to better align the thrust of emerging policies with the agreed outcomes of the recommendations of the Oxfordshire Growth Board. For reference, the proportion of Oxford’s unmet need allocated to West Oxfordshire was identified as 2,750 dwellings. Notwithstanding, this proposed level of housing delivery in the District should not be considered an absolute maximum, but instead should be viewed as a minimum target to assist in delivery of identified housing requirements. The Main Modifications document would therefore benefit |

in that it acknowledges that the Local Plan now includes additional provision to meet a proportion of the 'unmet' housing need arising from Oxford City, but which cannot be met within the city's administrative area. This is the correct approach and indeed necessary in order to meet the duty to cooperate following the meeting of the Oxfordshire Growth Board (OGB) on 26th September 2016 at which the proportion of Oxford's housing need to be met in West Oxfordshire - 2,750 dwellings - was agreed (with the exception of South Oxfordshire District Council).

Whilst generally supportive of the technical work and approach of the OGB, the University & Colleges identify that the 2014 SHMA specifies that the housing requirement for Oxford is between 1200-1600 dwellings per annum, with a midpoint of 1400, equating to between 24,000-32,000 over the 20-year Local Plan period with a midpoint of 28,000. The OGB however has taken as its starting point for Oxford's housing requirement as 25,000. On the basis that the urban capacity of the City is some 10,000, the unmet element of the city's housing need has been defined as 15,000 dwellings and it is this figure that the OGB has said should be provided in the adjoining authorities. There is therefore built into the OGB assessment a level of under provision of some 3,000 homes for Oxford compared with the SHMA midpoint.

The University & Colleges assess that the shortfall is not so great as to invalidate the work of the OGB and, on balance, that it is of greater importance that the Local Plan processes in Oxfordshire should proceed on the basis of the OGB work. In light of the shortfall, however, the conclusions of the OGB should be regarded as a minimum requirement for each of the adjoining districts and not an 'up to' figure. Policy H1 should express the housing requirement in these terms (See Main Modification 22 below).
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<td>from clarification on this matter.</td>
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<td>Ensuring that adequate provision for meeting the housing needs of West Oxfordshire as well as the wider unmet needs of Oxford City is critical to ensuring the preparation of a ‘sound’ Local Plan. The amendment at Paragraph 2.9 is supported in that it enables the Local Plan to meet a proportion of the unmet need from Oxford City. The amendment is also necessary in the context of the requirement for WODC to demonstrate it has met the duty to cooperate in respect of plan preparation.</td>
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<td>We agree to the additional wording to paragraph 2.9 which seeks to clarify that the Local Plan will now deal with the identified housing needs of the housing market area but also will make provision for the unmet housing need arising from Oxford City. This paragraph now offers clarification to the level of housing need required for the Plan period.</td>
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<td>Savills has been instructed by Spitfire Homes to submit written representations to the West Oxfordshire Local Plan 2031 Proposed Main Modifications document. These representations are made in respect of land at Jubilee Lane, Milton under Wychwood.</td>
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<td>The site off Jubilee Lane, Milton under Wychwood comprises greenfield land to the south of existing built development. The site is well located to the village edge and represents a logical extension to the village providing an opportunity to improve the character of the edge of the settlement. Planning history for the site is limited.</td>
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<td>Spitfire Homes supports the modification of paragraph 2.9 which outlines that the Local Plan 2031 will now support additional housing provision to accommodate a proportion of unmet need arising from Oxford City. Our client agrees with the principle of reflecting such additional provision in the emerging plan to better align the thrust of emerging policies with the agreed outcomes of the recommendations of the Oxfordshire Growth Board. This proposed level of housing delivery in the District should not be considered an absolute maximum, but instead should be viewed as a minimum target to assist in delivery of identified housing requirements. The Main Modifications document would therefore benefit from clarification on this matter.</td>
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<td>Kier Group</td>
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<td>It is not considered that the Main Modifications appropriately seek to meet the identified housing need of West Oxfordshire District as well as making additional provision to accommodate an appropriate proportion of unmet housing need that Oxford City are now unable to provide for within their own administrative boundary.</td>
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<td>Strong objections are raised in respect of this Main Modification. Particular objections are raised in respect of the level of unmet need from Oxford City being accommodated within the District. Paragraph 5.13 of the Plan sets out that a working assumption of 15,000 homes has been agreed by the Oxfordshire Authority's as representing the quantum of Oxfords unmet housing need which must be accommodated elsewhere within the Oxfordshire Housing Market Area. However, the actual unmet need as set out within the SHMA is a</td>
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range of between 15,000 – 18,000 homes. The District have applied a midpoint in applying the SHMA to the Districts own housing need and in the interest of consistency the same approach should be taken in respect of Oxford City’s housing needs. Furthermore, Paragraph 5.14 states that it has been agreed that West Oxfordshire will accommodate 2,750 homes in the period 2021 – 2031. This equates to 935 dwellings per annum when added to the Districts own housing requirements however this excludes past backlogs.

It is not considered that the 2,750 homes is an agreed, reasonable and proportionate division of Oxford City needs given that between 15,000 and 18,000 homes are to be distributed across the four Oxfordshire Districts. In addition, if the annual housing requirement (the Districts own housing needs together with Oxford City needs) do not include for past backlog, any calculation of housing land supply will need to factor in the backlog and due consideration will need to be given as to whether a 5% or 20% buffer should be applied on the basis of persistent underperformance.

Furthermore, as drafted the Plan does not reflect the latest position within the wider Strategic Housing Market Area in the context of the Duty to Cooperate. A Memorandum of Cooperation exists between all of the Oxfordshire Authorities in the context of having to meet the needs of Oxford City which cannot be accommodated within the city boundary. The Oxfordshire Growth Board have been tasked with identifying housing needs in Oxfordshire and then agreeing distribution across the authorities. The Plan for West Oxfordshire has been drafted on the basis of taking 2,750 houses in accordance with the Memorandum of Cooperation however South Oxfordshire have not agreed to their proportion of housing as confirmed at the Oxfordshire Growth Board meeting on 27th September 2016. This is significant and goes to the heart of soundness for two key reasons:

Firstly, the Duty to Cooperate cannot be said to be met when one of the parties with whom West Oxfordshire are seeking to cooperate with are not in agreement on the strategy for distributing unmet housing need from Oxford City. This in itself indicates that the Plan for West Oxfordshire cannot be sound; and

In terms of housing numbers, South Oxfordshire were recommended as part of the Duty to Cooperate to accommodate 4,950 houses from Oxford City. This compares with 4,400 houses for Cherwell District, 2,200 for the Vale of White Horse and 2,750 houses in respect of West Oxfordshire. Thus, it can be seen that South Oxfordshire were proposed to accommodate the greatest proportion of Oxford City’s unmet housing need and therefore the scale of the issue that has now arisen given that South Oxfordshire have not agreed to take these housing numbers is far greater than had the situation arisen in Cherwell District, Vale of White Horse District or West Oxfordshire District.

The consequence is that objectively assessed housing need are not being met in the housing market area until such time as either South Oxfordshire reverse their position and accept 4,950 houses arising from Oxford City; or the remaining authorities agree to take additional housing to reduce the amount that South Oxfordshire have to accommodate, to such a level that South Oxfordshire are prepared to agree to the housing numbers to be delivered in their administrative boundary.
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<td>There is no resolution to this matter and no indication from the Oxfordshire Growth Board Meeting of 27th September 2016 as to the extent of housing from Oxford City that South Oxfordshire District are prepared to accommodate. There is no alternative strategy available to the local authorities in Oxfordshire and no easy solution. Such are the implications arising from the wider Housing Market Area it is recommended that further work on the West Oxfordshire Plan, including progressing further with the Examination be put on hold pending resolution of these key issues at the heart of Oxfordshire and the West Oxfordshire Plan.</td>
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<td>213</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 4</td>
<td>The Consortium supports the amendments to paragraph 2.9 which note additional housing delivery to meet a proportion of Oxford’s unmet need. The Consortium agree with this amendment to bring the Plan in line with the agreed outcomes of the recommendations of the Oxfordshire Growth Board, with the allocation for West Oxfordshire being 2,750 dwellings. It is, however, considered that this level of provision should not be regarded as a cap or an absolute maximum, but rather as a minimum threshold requirement for the District.</td>
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<tr>
<td>MM357</td>
<td>Tony Bovey Mr Bovey</td>
<td>-</td>
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<td>-</td>
<td>663</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 4</td>
<td>2.28 and 2.50 (carbon footprint): 35% of the working population out commute and 7500 travel to Oxford by car. Sadly a reflection of the unsustainable structure and flow of life in the county. In the absence of a rational strategy, the Districts should cooperate to review the inner boundary of the Green Belt. To reduce unsustainable travel, and enhance sustainable movement (public transport, walking and cycling) for access to jobs and services, more housing should be provided on the edge of Oxford. The proposed Local Plan response is to build a ring of new satellite settlements and enlarged settlements on the outer edge of the Green Belt. Development that is functionally part of Oxford, yet spatially separate from jobs and services in Oxford. The prospect is inequitable: it privileges those living in Oxford and discriminates against those who have to decant into extra Green Belt housing with the associated costs of travel to work and services, less information about job and leisure opportunities, deracinating and isolating former Oxford residents from family, friends and opportunities. This is especially pertinent for those on lower income, who would be spatially isolated from their known city in dormitories.</td>
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<tr>
<td>MM363</td>
<td>Oxford City Council Ms Dell</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>681</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 4</td>
<td>Oxford City’s unmet housing need As a result of the continued joint working arrangements through the SHMA it does now appear that the modifications to the Local Plan include revisions to their housing policies to include an element of Oxford’s ‘unmet’ housing need of some 2,750 dwellings This has been achieved principally by identifying two new strategic site allocations comprising West of Eynsham and north of the A40 new Eynsham (new ‘garden village’).</td>
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These new sites identified in Eynsham were originally highlighted by the consultants through the joint working arrangements as part of the Post SHMA apportionment. These sites were explored as spatial options for additional housing provision and subject to sustainability assessment. This showed the value of all partners working together to prepare and agree the evidence base using shared working assumptions. They do appear therefore to be the most realistic options for seeking to help meet Oxford’s unmet housing need.

Support: Oxford City Council wish to support in principle the revised changes to the Local Plan and in particular:

* Main Mod 4 (Para 2.9), together with those in Main Mod 9 (Vision) and
* the Overall Strategy (Paras 4.17 and 4.18 and 4.18a) which show the local authority’s commitment to ‘play a role in helping to meet wider needs’ including the ‘unmet housing needs’ of Oxford (Main Mod 15) through the allocation of the Eynsham site and the Garden Village.

Objection:

The City Council consider that it would be helpful if a separate published housing trajectory could be provided with their AMR each year to demonstrate progress made in meeting the housing needs of the city, nomination rights for affordable housing and provision extended to OCC housing list.

Given the proposed allocations are to help to contribute towards meeting Oxford’s unmet housing need it would therefore be important to understand and agree how the ‘affordable housing’ element will be provided. For example the proportion and type of affordable housing that will be delivered should as near as possible be shown to relate to Oxford’s need.

Another key issue of concern is transport and infrastructure which arises from the sustainability assessment which does highlight the existing traffic and congestion problems currently experienced along the A40 leading into Oxford. In this context it will be vitally important to the delivery of this housing development that the proposed infrastructure improvements to the A40 (including new bus lanes and significantly improved cycling facilities and routes) is agreed as part of the wider transport strategy for the County and that evidence to show how it fits in with the revised Oxford Transport Strategy is essential to the successful delivery of this major project. Prior to the development taking place these transport and infrastructure mitigation measures should be agreed and appropriate funding secured to ensure that these are fully implemented before development takes place.

A detailed transport assessment should therefore be required by future developers, and submitted to the County Council as Highway Authority, but also widely consulted upon with neighbouring authorities such as Oxford City Council to show how this significant amount of new housing development will meet the standards of a truly ‘sustainable development.’ It is therefore considered important that the amount of car parking is reduced to a minimum and good alternative cycling and pedestrian facilities (both routes and
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<td>MM367</td>
<td>Ascott Parish Council</td>
<td>-</td>
<td>Carter</td>
<td>690</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 4</td>
<td>Ascott-under-Wychwood Parish Council notes that our village has actually been named for the first time in the Draft Local Plan 2031 and has been moved to the 'Villages' category. We are very concerned that this has been done apparently arbitrarily and without any consultation at all with the Parish Council. The consequence is that certain statements which were acceptable last year (when only 2 Wychwood villages were named) are no longer accurate with Ascott-u-W included. Ascott is a village one half and one third of the size of the other two Wychwood villages and with far fewer amenities. It is not accurate to include Ascott in the general Wychwood statements written last year. This places us in the difficult position of strongly objecting to statements which are not among the amendments but our objections do flow from the original critical amendment – that of naming Ascott-under-Wychwood in the Villages category. In particular, we feel that the impression is given over and over again that Ascott-u-W is reasonably well served by public transport. This is blatantly not the case and the situation has got worse in the past 6 months with the cuts in bus subsidies (as indicated in our response to the WODC Planning Services Parish Survey 2016). Ascott-u-W also appears to have a Post Office (Friday afternoon in Tiddy Hall does not constitute a Post Office) – and a smart railway station with a reasonable service (when in fact it has 1 train each way on weekdays only, too late in the morning for London commuters and even Oxford schools). We are extremely concerned that an inspector, if considering a planning application appeal, might refer to the WODC Local Plan 2031 and think that Ascott-under-Wychwood has amenities equal to Shipton and Milton and we would ask that the Draft Local Plan be amended to reflect the true picture.</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>751</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 4</td>
<td>Stagecoach recognises, welcomes and supports the Council’s reconsidered stance, to seek to provide for its assessed housing needs in full, and to meet Oxford City’s unmet need as far as it is consistent with the principles of sustainable development.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>139</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE</td>
<td>The addition of school places will need to be carefully monitored to ensure that newcomers to the area, including Oxford City's unmet housing community, do not take most or all of these places, leaving locals as badly off as they are now. How does WODC plan to avoid this scenario? No doubt the new houses will be significantly improved surface treatment) and public transport options (Park and Ride and bus services) is provided. Public transport bus links either from the Park and Ride or other bus options should ensure that there are regular services provided to existing nearby train stations serving London such as Hanborough (Worcester – Paddington) and Oxford Parkway (Oxford to Marlyeborne) Given the scale of the new development being proposed by the allocation of the new strategic site allocations it will be important to fully take into account the local transport, education and health implications for the existing settlement at Eynsham.</td>
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<td>MM16</td>
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<td>Josmond</td>
<td>Mr</td>
<td>Osmond</td>
<td>19</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 5</td>
<td>marketed nationwide, attracting people from London and the South East (often looking for good schools for their children), whose greater purchasing power will increase house prices.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2222</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 5</td>
<td>Main 6: The report does not highlight that the schools in the CN area are not or will not be under the direct control of the CC. 600 further homes will generate an even greater need for schooling over which the WODC plan has no or little control.</td>
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<td>MM61</td>
<td>NP</td>
<td>Pearce</td>
<td>Mr</td>
<td>Pearce</td>
<td>528</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 5</td>
<td>Appendix 2 – Education Comments Other village growth Non-strategic sites totalling 75 homes are included for Long Hanborough and 50 for Stanton Harcourt. Already permitted developments in Long Hanborough provide opportunities to expand Hanborough Manor Primary School sufficiently to meet the proposed housing growth in this village. Stanton Harcourt Primary School would need to expand to accommodate housing growth, and options to achieve this are being explored. The proposed scale of development at Minster Lovell, Stonesfield and Shipton-under-Wychwood can be accommodated in the existing primary schools. The proposed scale of development at Burford would be expected to exceed the current primary school's capacity, and this school may be challenging to expand due to site constraints. The proposed scale of development at Charlbury would be expected to exceed the current primary school's capacity, and expansion of the school will be needed to meet this and other developments already permitted. Options are being assessed, but initial conclusions are that this school would be challenging to expand. In previous responses, OCC advised that expansion of Enstone CE Primary School was not thought to be possible. Further work has now identified limited scope for expansion.</td>
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<td>MM33</td>
<td></td>
<td>Nicholas Goodwin</td>
<td>Mr</td>
<td>Goodwin</td>
<td>67</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 5</td>
<td>There will be a need for an expansion of secondary capacity even if the Garden Village is not given the go-ahead</td>
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<tr>
<td>MM417</td>
<td>Education Funding Agency</td>
<td>Samantha Powell</td>
<td>Ms</td>
<td>Powell</td>
<td>921</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 5</td>
<td>The EFA supports the new reference within Chapter 2 (Main Modification 5) to the need for new secondary provision in Witney and Eynsham. It is helpful to have this set out as context within the introductory chapters of the plan.</td>
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<td>MM61</td>
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<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>140</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 6</td>
<td>The weakness identified as “imbalance between jobs and homes in Carterton” could be partly addressed by locating the new Science Park in Carterton, rather than Eynsham, particularly as the imbalance will be increased by the building of new homes there. Once a Science Park is a certain distance from the academic centre (University of Oxford), does it really make much difference if it is 18.1 rather than 7.8 miles away, particularly if bus services will improve (and a railway from Oxford to Witney to Carterton is built)?</td>
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<tr>
<td>MM752</td>
<td>Bloombridge</td>
<td>Bloombridge</td>
<td>Mr</td>
<td>Cutler</td>
<td>1869</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 6</td>
<td>MM6 &amp; MM7 - SWOT Table These modifications introduce changes which in the weaknesses section state that a lack of direct access from the primary road network to Carterton and an imbalance between jobs and homes in Carterton with a consequent high level of commuting. As set out in these representations this does not have full regard to the expansion of RAF Brize Norton in terms of jobs growth in Carterton - i.e. the missing 2,500 jobs and ‘Superbase’ economic potential. Accordingly, this change should be deleted as it is not justified based on proportionate evidence.</td>
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<tr>
<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
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<td>1870</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 6</td>
<td>MM6 &amp; MM7 - SWOT Table These modifications introduce changes which in the weaknesses section state that a lack of direct access from the primary road network to Carterton and an imbalance between jobs and homes in Carterton with a consequent high level of commuting. As set out in these representations this does not have full regard to the expansion of RAF Brize Norton in terms of jobs growth in Carterton - i.e. the missing 2,500 jobs and ‘Superbase’ economic potential. Accordingly, this change should be deleted as it is not justified based on proportionate evidence.</td>
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<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>752</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 6</td>
<td>MAIN 6 para 2.50 “Weaknesses”: Stagecoach welcomes and supports the recognition by the Council that in the main urban areas, there is a reasonable supply of public transport. In fact to Witney, Woodstock and Carterton in particular there are frequent bus services, operating 7 days a week and with journeys running late into the night. This is far from typically nationally, for towns of their size. This underpins the case to locate development as far as is possible, to those locations where the “fullest possible use” can be made of those options, in line with NNPF paragraph 17. These opportunities might also lie in a few instances, along the line of existing or potential</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1046</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 7</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN7 for its reference to the historic environment as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
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| MM756   | Cantay Estates     | Cantay Estates  | -     | Cantay Estates | 1928       | > SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 7                          | Proposed modification- Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.  
The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making.  
The proposed 'Garden Village' is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification.  
The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process. |
A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.

Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.

Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.

MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.

MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.

MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.
The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.

The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.

While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.

MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.

We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of
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<td>homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.</td>
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<td>MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.</td>
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<td>MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.</td>
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<td>The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.</td>
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<td>MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.</td>
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<td>The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.</td>
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<td>MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.</td>
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<td>The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.</td>
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<td>MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds</td>
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The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use altogether. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.

Consider rephrasing to reflect that the majority of cycle routes in Oxfordshire are on road:

Limited opportunities for safe travel by foot or cycle outside main towns such as where routes are on or adjacent to busy roads

An acknowledged weakness in the plans is the air quality in Chipping Norton - which is an AQMA, but there is no opportunity recorded to improve the current air quality. Surely the air quality should be being improved before it is further impacted by significant house building? The plans at best attempt to mitigate the impact of the houses and mitigating the impact is impossible to achieve, so there will be further deterioration in air quality in Chipping Norton. See the Chipping Norton Transport Options study:

3.2.1 - At the outset of undertaking this Study, OCC Officers stressed the need to consider what mitigation measures might be required to provide effective mitigation of additional development within and around the town. Of particular concern is the need to address existing air quality issues and provide effective mitigation of predicted deterioration in air quality within the town centre, particularly along the A44 High Street / Horsefair corridor that has been declared an Air Quality Management Area (AQMA)

The 4th line:

Attracting "inward investment" and a more "self contained local economy" is a contradiction in terms.

Addressing congestion is not an opportunity, it is a necessity, and clarifies that there is no capacity for further housing. Road infrastructure improvements are needed to satisfy the current population, and should not be a proxy for further demographic growth.
"New" sustainable construction methods do not require energy intensive gravel extraction, which is one of the "oldest" activities known to prehistoric man. The presence of such is therefore not a relevant "strength", especially given well-publicised national skilled labour shortages in the construction industry.

How on earth would greater numbers of affordable housing increase the numbers of home workers? There are the least likely people to be able to home-work.

The weakness identified as 'imbalance between jobs and homes in Carterton' could be partly addressed by locating the new Science Park in Carterton, rather than Eynsham, particularly as the imbalance will be increased by the building of new homes there. Once a Science Park is a certain distance from the academic centre (University of Oxford), does it really make much difference if it is 18.1 rather 7.8 miles away, particularly if bus services will improve (and a railway from Oxford to Witney to Carterton is built)?

The Weakness identified, as an "imbalance between jobs and homes in Carterton" should be addressed by locating the proposed Eynsham North "Garden Village" Science Park at Carterton. This would maximize the potential synergy and exploit the critical mass between the future expansion of a BAe / RAF Science and Technology zone. A small, free standing Science Park in the highly visible A40 corridor approach to the Cotswolds AONB and Oxford Green Belt, as proposed, makes no strategic, landscape or employment sense.

To make the heroic assumption that residents of the "Garden Village" will work in the proposed "Science Park" is not credible and is not borne out by experience.

There is a small industrial estate within Freeland Village, to my knowledge not a single village resident works within the Estate.
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus Dr Small</td>
<td>Dr Small</td>
<td>753</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 7</td>
<td>MAIN 7 para 2.50 &quot;Opportunities&quot; Stagecoach welcomes and strongly supports the renewed recognition that there are opportunities presented to Plan in such a way that public transport infrastructure and services can be improved. Stagecoach agrees that targeted road improvements are also clearly justified, and these can directly or indirectly improve the speed, attractiveness and reliability of bus services. In particular, the Shores Green Slip Roads, and the B4477 &quot;Access to Carterton Improvement&quot; would fall into this category. The West End Link Road is clearly necessary if planned development north of Witney is to take place without unacceptable deterioration in traffic conditions. Transport issues ought to be considered holistically to ensure access and movement is optimally facilitated. There are some instances where the soundness of the Plan remains questionable, because of the failure to demonstrate that the preferred development strategy does not lead, on implementation, to serious unmitigated transport impacts. Nor is it clear in a few cases, that the options selected are the most appropriate when all reasonable alternatives have been considered.</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1049</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 8</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN8 for its recognition of a number of designated heritage assets being at risk as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
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<td>MM55</td>
<td>Catherine Mrs Baker</td>
<td>Mr Mrs Baker</td>
<td>120</td>
<td></td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 8</td>
<td>I can’t see how adding so many new houses adjacent to the A40 between Witney and Oxford could possibly result in an opportunity to address congestion on this stretch of road. Even if improvements are made to the road, adding an extra 3000+ houses in this location is bound to increase congestion rather than relieving it.</td>
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<tr>
<td>MM749</td>
<td>Home Builders Federation Ltd</td>
<td>Home Builders Federation Ltd Mr J Stevens</td>
<td>Mr Stevens</td>
<td>1815</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 8</td>
<td>We note the modification that states: “The delivery of historically high, for West Oxfordshire, housing targets given the local track record of the development industry”. We consider this statement to be unnecessary. It is true that the new housing requirement will be higher than ones set previously under different planning regimes. This may present challenges for the council and for developers. Nevertheless, the objectively assessed housing need of the district is what it is, and the Framework requires those needs to be met. Therefore, using the Plan to speculate on the ability of the industry to meet the new requirement isn’t strictly necessary. Moreover, what transpired in the past does not necessarily serve as a reliable indicator of what could happen in the future. Oxfordshire has a strong economy and a vibrant housing market where housing is much in demand. Oxford City is confronted by critical shortfalls of housing supply compared to need hence the need for the four satellite authorities to...</td>
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make provision. The view of the industry is that housing targets have been too low in West Oxfordshire in the past compared to need and demand. This is why we now have acute affordability issues in the county. The Council also has a poor track record of delivery compared to past targets, such as the target set by the South East Plan (365 dpa). We illustrated this is our response to the August consultation on the OAN review. This under-delivery will not have helped to increase the capacity of the industry. Decisions about land supply and local policies will also have contributed to suppressing delivery.

Nevertheless, achieving the new requirement could present challenges. One of the essential ingredients to increasing and sustaining the rate of housing delivery will be for the Council to diversify the nature of the land supply across the district by providing a healthy mix of small, medium and large sites. Sites in different places and of different sizes will help to meet the business needs of different sized housebuilding companies.

This will tend to build-up the long-term capacity of the industry. We will make some further comments on this subject below.

Resolving the housing crises requires a partnership between private sector housebuilders and local government. As the Government asserts in the foreword to the Framework, planning "should be a collective enterprise". We agree. The delivery of the new plan is the responsibility of the Council as much as the development industry - they are two sides of the same coin. We hope that Council will consider removing this sentence.

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<td>MM771</td>
<td>Stormport (UK) Ltd</td>
<td>Stormport (UK) Ltd</td>
<td>-</td>
<td>Stormport (UK) Ltd</td>
<td>2036</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 8</td>
<td>Stormport wish to make the observation that the delivery of an annual housing target which is historically high for West Oxfordshire has to be seen in the context of the prevailing planning policy in the current Local Plan and its previous iterations. Simply because such a number had not been achieved before, is more than just a simple reflection on the ability of the development industry to deliver at such rates.</td>
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<td>MM773</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>2072</td>
<td>&gt; SECTION 2 - WEST OXFORDSHIRE IN 2016 &gt; MAIN 8</td>
<td>The new insertion appears to highlight that higher delivery rates are considered challenging for the District given the local track record of the development industry and cites past rates of delivery as evidence of this. This is an over-simplistic approach and appears to suggest that the industry will struggle to deliver the higher housing numbers. When looking at more recent data from 2008/09 onwards, it is important to remember that the recession will have affected more recent housing delivery. Furthermore, much of WODC’s past delivery has been linked to urban extensions which inevitably take longer to come on stream. Furthermore, the Council have in recent years habitually refused applications in the face of an acknowledged shortfall in housing land supply, which has both exacerbated the issue and means in turn that suitable sites are taking longer to come through the system due to the need for them to be determined through the appeal system.</td>
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<td>MM786</td>
<td>Oxfordshire County</td>
<td>Amada Jacobs</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2288</td>
<td>&gt; SECTION 2 -</td>
<td>Consider rephrasing to better reflect key public health priorities for reducing inactivity:</td>
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<tr>
<td>MM788</td>
<td>Council</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr</td>
<td>Murray and Blackwell</td>
<td>WEST OXFORDSHIRE IN 2016 &gt; MAIN 8</td>
<td>Improvements in public transport, walking and cycling facilities to help reduce physical inactivity and the use of the private car</td>
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| MM370        | Brize Norton Parish Council |               | Mrs            | Peach              | > SECTION 2 - WEST OXFORDSHIRE IN 2016 > MAIN 8 | MAIN 8 – SWOC Table ‘Challenges’

2.4. The landowners wish to make the observation that the delivery of an annual housing target which is historically high for West Oxfordshire has to be seen in the context of the prevailing planning policy in the current Local Plan and its previous iterations.

Simply because such a number had not been achieved before, is more than just a simple reflection on the ability of the development industry to deliver at such rates.

Unsound as there is no proof of the further major investment opportunities that are claimed.

**RAF BRIZE NORTON INFORMATION**

There are currently circa 7,300 people employed at the base. This comprises 5,800 Service Personnel, 1,200 Civilians and 300 Civil Servants. (Source: Paragraph 9.3.2 Local Plan, http://www.raf.mod.uk/rafbrizenorton/organisation/index.cfm)

The ‘Real Estate’ and infrastructure are now at capacity and the latest elements have been completed by transient workers.

Project Gateway, which completes in 2018, will not afford any increases to manpower.

Strategic Defence Review (SDR) 2015 – achieved further reductions in MOD personnel and Civil Servants along with additional cost savings. Military personnel are at a steady state and will not increase; it is in fact, more likely to decrease.

Planning assumption for SDR 2020 will include a reduction in operational consultants, Civil Servants and Service Personnel.

Two new aircraft, Air Tanker (Voyager) and Airbus (A400M), have created new jobs but these positions are now fulfilled.

There is a potential for approximately 200 new jobs related to the above aircraft over the next decade but this will be offset by a similar reduction in maintenance and flight crews associated with the Hercules.

With the above in mind, the only opportunity for new personnel to potentially purchase a property in Carterton is derived from natural staff turn-over.
Based on the information presented above, the opportunities and challenges detailed in MAIN 8 2.50 (SWOC table) seem unrealistic.

Historic England welcomes and supports Proposed Main Modification MAIN9 for the addition of “historically” and the reference to the landscape setting of Witney as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.

Main 9: Paragraph 3.2
1.1 The Vision for the Future continues with only limited alteration compared to that which informed and defined the original submission version of the Plan with the emphasis placed on directing development (now a ‘significant proportion of new development’ as opposed to ‘most development’) towards the three largest settlements within the District, namely Witney, Carterton and Chipping Norton. In addition the strategy includes creation of a ‘Garden Village’ north of Eynsham to help meet the unmet housing needs of Oxford, which were not addressed within the earlier submission version of the Plan. Importantly the Vision states that elsewhere within the District the distinctive qualities of West Oxfordshire’s towns and villages will be protected and where possible enhanced, with appropriately scaled development accommodated within settlements, subject to the provision that such development should not compromise the defining character, appearance or setting of the settlements within which it is located.

1.2 This is an important requirement and one that should be adhered to assiduously in prosecuting the overarching strategy of the Local Plan. It should be noted, having regard to the need to ensure that the Plan is not just consistent with national policy, but is also internally consistent in its approach, that the Vision has not changed in respect of the defining strategy for delivering development (the ‘Three Towns Focus’). In this respect also the components of the Vision that relate to Witney, Carterton and Chipping Norton have not altered, with the exception of ensuring that there is a direct reference to protecting the landscape setting of Witney.

1.3 The undertaking to protect and enhance the distinctive qualities of the District’s towns and villages is maintained; although this is made subject to the additional proviso that any development that takes place should not compromise or detract from character, appearance and setting. While this is welcomed, and is consistent with the evidence base that underpinned the submission version of the Plan, it is questionable whether this Vision is appropriate to the strategy that is adopted in respect of delivering housing to meet the uplifted OAHN for West Oxfordshire.

1.4 The policies that are set out within the Local Plan are not now wholly consistent with the Vision as expressed at the outset of the document and therefore cannot be considered to be justified having regard to the tests of soundness set out at paragraph 182 of the NPPF.
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| MM55         |                        | Catherine      | Mrs              | Baker             | 124        | > SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION > MAIN 9 | 2 OVERALL STRATEGY Paragraph 4.2 (bullet 2)  
2.1 For reasons essentially the same as set out in respect of Main 9 (3.2) the overall strategy of the Local Plan is based on five key strands that inform all policy decisions contained within: The second strand in this list is the objective of ensuring that all development is located in the 'right places'. The criteria that informed the submission Local Plan have not been diluted or diminished; in fact the Main Modifications impose further criteria, which require that all decisions on where to locate development must contribute positively to conserving and enhancing the natural and historic environment.  
2.2 This approach is consistent with the Vision and with the evidence base that supports the Local Plan, and the reinforcement of the objective is welcomed. However the approach that is taken to locating development is not consistent and is therefore not justified having regard to paragraph 182 of the NPPF.  |
| MM505        |                        | Verena Hunt    | Miss             | Hunt              | 1243       | > SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION > MAIN 9 | The intrinsic character, appearance and setting of Eynsham will be irrevocably altered by the addition of so much extra housing to the north and west of the village, at odds with the stated aim of the Vision for West Oxfordshire. If the plan to build over all available land to the north and west goes ahead, Eynsham will inevitably change from a self-contained large village with services that have grown organically to support its changing character over the centuries to something quite different - this change will be rapid and it will not be within the local residents’ control. At this point we don’t have a clear picture of how the proposed Tilgarsley settlement or the extension to Eynsham to the west will look, or of the services that may or may not be provided for residents there. So it is impossible to feel confident that the proposed plan will offer any kind of improvement for current Eynsham residents, or that new residents of Tilgarsley and west Eynsham will have the services they need. One thing that does seem clear, however, is that the character of the Eynsham area will change completely rather than being preserved as the Vision statement requires. |
| MM728        | Abbey Developments and David Wilson Homes Southern | -              | -                | -                 | 1657       | > SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION > MAIN 9 | Given its proximity to Oxford and good transport links, the proposed new ‘Garden Village’ near Eynsham makes strategic sense to help meet Oxford City’s unmet housing need.  |
|              | 'Our Vision’           |                |                  |                   |            |                   | We note that the Proposed Modifications (MAIN9) includes new wording to the section of the Vision relating to Witney. As we set out in more detail below, the additional wording appears to conflict with the increased capacity of the proposed SDA at North Witney and East Witney, which is not supported by the Council’s Landscape evidence.  
By contrast, the Council’s Landscape evidence (Landscape and Visual Review of Submissions: Carterton and Witney (Witney Addendum) January 2013)) identified that the South Witney site should be considered |
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<td>MM746</td>
<td>Hallam Land Management</td>
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<td>-</td>
<td>1804</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>in “further detail” with an estimated housing capacity of 500 homes.</td>
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<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
<td>-</td>
<td>1929</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>Proposed modification - Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making. The proposed ‘Garden Village’ is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification. The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process. A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been</td>
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We do not believe that the Garden Village proposal at Eynsham is an appropriate measure for delivering the unmet need for Oxford. It is based on an ambitious timescale for delivery and given that the Government’s announcement for the results of Garden Village proposals has not yet been announced (MAIN 17 references an application for funding), it is unclear how and whether the council will be able to deliver the scheme if the site is not selected of the Locally-led Garden Villages. The anticipated delivery numbers in the bid document are also unrealistic. It would be more appropriate to deal with the objectively assessed need and allocate development to settlements that can deliver homes across the plan period in a more effective manner. MAIN 3, 9, 15 16, 17, 23, 24 and 27 should be reconsidered and amended accordingly. |
published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.

Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.

Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.

MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.

MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.

MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.

The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the
longstanding nature of several of the outline planning permissions.

The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.

While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.

MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.

We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.
MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough's settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford's unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.

MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.

The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.

MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPFs encouragement of environmentally sustainable development.

The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use all together. Additional cycle parking
should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.
### SECTION 3 – WEST OXFORDSHIRE IN 2031

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<td>MM69</td>
<td>Mugglewitch</td>
<td>Mrs Sensicall</td>
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<td>204</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>The vision for the future should be agreed by the population. Taking Witney as an example, how on earth will parking be provided for approximately 3 times more cars than there are at the moment. I saw a reference to the building of multi-storey car parks at the Witney expo. The suggestion was to build them on the current car park on Witman Way. That would compromise the landscape setting. Imagine facing such ugly (they always are) buildings when walking in to town from Madley Park or when travelling in to town along that route. Think of the additional traffic jams and the additional pollution. Witney town center would suffer and lose custom. Consequently, Witney would no longer be a small, vibrant market town.</td>
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<tr>
<td>MM780</td>
<td>North A40 Land Consortium</td>
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<td>2120</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>Main Modification 9, Paragraph 3.2, 'Our Vision' The Consortium fully supports the delivery of a Garden Village to the north of the A40 near Eynsham. This is reflected in amendments to Paragraph 3.2 'Our Vision' which outline that: &quot;a new 'Garden Village' will be created to the north of the A40 near Eynsham comprising an exemplar development of the highest environmental and design standards based around a mix of compatible uses including housing, employment, transport, new schools and other community and leisure uses. The new village will be self-contained seeking to complement and enhance the current role of nearby Eynsham.&quot; The Consortium reiterates its support for this proposed main modification to support delivery of a Garden Village at land north of the A40 near Eynsham.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2289</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>Although specific issues, such as obesity and increasing walking and cycling rates, are mentioned no general statement on wanting to improve the health and wellbeing of the Districts residents is included within 'Our Vision'. Key general points to consider including might be: Encouraging the development of an environment which: * provides opportunities for people to be more active, * provides opportunities to make healthier food choices * fosters good mental health and wellbeing by increasing opportunities for social interaction/reducing social isolation and loneliness * enables people to maintain their independence for longer. It is strongly recommended that improving 'health and wellbeing' is also included in the vision for Eynsham 'Garden Village'. Consider rephrasing to better reflect key public health priorities for reducing inactivity: Improved opportunities for walking, cycling and the use of public transport will have helped to reduce physical inactivity and reliance on the private car Consider rephrasing to better reflect key public health priorities for reducing inactivity/obesity: ...rates of physical activity will have increased through improved active travel, leisure and recreation provision, leading to a reduction in rates of physical inactivity and obesity.</td>
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<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr</td>
<td></td>
<td>2301</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>MAIN 9 - Paragraph 3.2 2.5. The landowners object to the provision of a new Garden Village as a cornerstone of the development Vision for the District on the basis that there has been no government decision on whether such a proposal will</td>
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<td>MM95</td>
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<td>GMM Miss</td>
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<td>Manglely</td>
<td>241</td>
<td>VISION &gt; MAIN 9</td>
<td>It is impossible to claim that Chipping Norton will not have its 'intrinsic character, appearance and setting compromised' if 1400 homes are built at Tank Farm, a link road diverts some traffic out of the town centre but leads it to enter the town via other junctions (because the traffic flow is very much east-west (and vice versa) and further homes are built as well (around 2300 in total)? Which is more than doubling the size of this small market town. The claim is unsound and can not be substantiated.</td>
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<tr>
<td>MM21</td>
<td>Thoughtful Mr</td>
<td>Reese</td>
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<td>28</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>The &quot;vision&quot; should be developed by consensus from regular local people, and not imposed. Extensive community engagement would have come up with a very different vision. Every village you drive through is opposed to more housing. Has the extensive engagement actually involved listening to anyone or was it a tick box exercise? The special place should not be eroded by ANY decision for future development or change. We do not want sudden big changes either. New development is not necessarily required to support economic growth. The average GDP of the region is growing nicely anyway. The region does not need demographic growth to achieve economic growth. The quality of life is based on the rural nature of the area. This must be safeguarded.</td>
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<tr>
<td>MM21</td>
<td>Thoughtful Mr</td>
<td>Reese</td>
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<td></td>
<td>29</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>See comment at 1.2 above. Unless the vision is democratically agreed by local people then no local plan, nor any proposed development of any form (in the absence of a local plan)can be considered as &quot;sustainable&quot; and therefore should not be permitted, regardless of the existence of a local plan.</td>
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<td>MM3</td>
<td>richard andrews Mr</td>
<td>Andrews</td>
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<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>Lack of soundness is due to the inconsistency in Eynsham's case between the laudable aspiration to retain the context and character of the larger villages and proposals later in the plan to build on every available scrap of land surrounding the village. Local opinion in Eynsham is well tested through the consultations that have been undertaken towards a Neighbourhood Plan which is well advanced but has not been made, in part due to the absence of an overarching local plan and the lack of a 5 year land supply.</td>
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<td>MM309</td>
<td>Phillip Parker -</td>
<td>Phillip Parker</td>
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<td>543</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt;</td>
<td>We believe the revised local plan is not sound as the opportunity for development in Wootton has not been objectively assessed, and the need and opportunity for improved cycling links between Wootton and Woodstock has not been considered, which is particularly important for children and their access to schools. MAIN 9: Vision:</td>
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<td>MM314</td>
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<td>Raymond Hall</td>
<td>-</td>
<td>Hall</td>
<td>564</td>
<td>MAIN 9</td>
<td>Improvement in physical activity should be increased through improved commuting facilities (especially for cycling) as well as through leisure and recreational activities</td>
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<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>West Oxfordshire District Council Local Plan 2031 consultation</td>
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<td>May I first of all thank each member of the team for the care shown in preparing the draft Local Plan and in the way each member has related to the community we all seek to serve.</td>
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<td>In the revised Local Plan, the housing target has increased from 10,500 dwellings to 15,950 in the period up to 2031. That revised number is very substantial indeed: some 52%.</td>
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<td>If an average of 2.5 persons per home is applied, the population increase is now of the order of 40,000 people. Witney currently hosts some 28,000 people. The revised population increase is, therefore, of some 43%.</td>
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<td>Those projections are only up to 2031. At present there is no reason to think that trend will not continue beyond that focal date and do so, not just for another 15 year period, but also for several equivalent eras on into the future.</td>
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<td>Clearly is important that the West Oxfordshire District Local Plan should not only anticipate the requirements of the next 15 years, but also the needs of the 15, 30 and even 45 years that will then follow.</td>
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<td>I am an Architect/Planner by background, who founded and ran a multidisciplinary practice based in London for 30+ years called ‘People and Places’. My home is now in Witney and my focus is big picture strategies that provide a context for decision making on specific projects, with the ability to implement each stage in context on into the future.</td>
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<td>My responses set out here to the revised draft Local Plan for West Oxfordshire draw on that experience.</td>
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<td>A Local Plan that embraces Neighbourhood Plans</td>
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<td>The former Mayor of Witney, Cllr Jim King, and Deputy Mayor (now Mayor), Cllr Chris Holliday, learned of the work that I have been doing.</td>
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<td>They then, approaching two years ago, asked me to help shape the basis for a Neighbourhood Plan for the town they serve. I agreed to do that as a member of the public and hence as a volunteer.</td>
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<td>That understanding enabled me to set my thinking for Witney in the context of a much bigger picture: for I knew that such a Neighbourhood Plan had be relevant not only to the future of West Oxfordshire and all of the other towns and villages that region hosts.</td>
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<td>It had also had to respond positively to the ‘drivers’ that have caused the anticipated population growth then in the process of being defined for the Local Plan: they were drivers that have to be understood, stated and assumed to continue to generate further increases in the decades to come.</td>
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<td>As a result, a Neighbourhood Plan for Witney had to be conceived with one for Carterton, Brize Norton, Eynsham and each of the other villages and towns in the District.</td>
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<td>It had also to be seen in the context of the primary driver for growth. That driver is the ‘global powerhouse’ that is London, in partnership with Oxford, and the world stage on which both cities operate.</td>
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The link below and my report is the outcome, which is entitled:

'A new future for Witney and the Cotswolds: a discussion paper'


A holistic approach

In that report, you will see that I have taken into account the housing increases mentioned above and the locations tabled in the current revised draft Local Plan where that demand is sought to be met.

As examples, those locations include Witney North and West, West Eynsham, the recently proposed Garden Village north of the A40 at Eynsham, as well as Carterton, Freeland and Hanborough.

In preparing the report, I have met with certain key statutory officers as well as community representatives from each of those locations. The views of such directly relevant players as the Station Commander of the military air base in Brize Norton have also been taken into account.

My thinking has embraced Oxfordshire County Council's goals for the A40 junction at Shores Green, a Park and Ride at Eynsham and the very welcomed enhancements planned for the A40, with transport being a pivotal point of reference as part of an holistic approach.

Having been involved in many developments as an Architect, I have in parallel anticipated the significant increase in demand for utilities such as gas, water, electricity and tele-communications new housing generates.

My conclusions, therefore, regard infrastructure not as an add on over time, but as a fundamental pre-requisite to every stage in the implementation of a Local Plan.

That priority is even more relevant here in West Oxfordshire knowing its transport infrastructure, even when with the currently planned enhancements, falls far short of what is needed and even further when the scale of population increase anticipated is embraced.

Getting ahead, making a problem an opportunity

My view is that the draft Local Plan in its present form will fail because of grossly inadequate forward planned transport infrastructure.

If the Local Plan fails in the era up to 2031, the negative consequences will then accelerate in the 15 year period that then follows - and it will exacerbate on and on. Pro-action now that is on a realistic as well as imaginative base is, therefore, needed.

I also concluded that such pro-action had to be private sector core funded, thereby enabling early implementation. My thinking outlined in the report is, therefore, geared to that end.

My goal then is that every community within our district and county ‘gets ahead’ of the problems it currently faces and grasps the opportunity to shape a new future for Witney and the Cotswolds, starting in the immediate present: namely in 2017.
The proposals outlined seek to do that. Their context is the draft Local Plan now being consulted on. As will be seen, their content, however, is very different.

That difference does not suggest a lack of appreciation of the work carried out by officers and their appointed colleagues. Indeed the opposite is the case: for such ideas as a park and ride at Eynsham and a Garden Town nearby are admirable. My recent understanding of OCC's thinking for a form of 'water world' to the south of Witney only adds to that appreciation.

It does, however, suggest that there now needs to be a 'stepping back' in order to grasp more fully the scope, scale, immediacy as well as longevity of what is coming. When doing so, my view is that the strategic and detailed thinking needs to go much, much further.

Based on my own long experience, that is what I have sought to do, with an outcome that is set out here as a basis for further discussion.

An exemplar in 'Localism'

As part of my own consultations, I have in my report referred to a meeting I had with the Leader of Oxfordshire County Council, Cllr Ian Hudspeth, and the Mayor of Witney, Cllr Chris Holliday.

Their shared fundamental conclusion was that the final version of the West Oxfordshire District Council's 2031 Local Plan must not prevent my conclusions being taken further and considered for possible delivery. Their view was that the contents of the Local Plan should facilitate such consideration.

As I have mentioned that meeting, do note that I have copied this email and the document attached to both Ian and Chris for their reference.

When reading the document, do also note reference to the innovation capability of so many of the businesses in our District and their potential response to the global need to generate green energy. As you can see, my goal is to showcase that capability and develop a knowledge and skill base of substance ready for a market place that is world wide.

In parallel, do then note that a key dimension of my thinking has been the involvement of as many local people as is possible in its formation.

As is explained more fully in the report, having met with many members of the broader community, the thinking outlined here was presented to an extraordinary meeting of Witney Town Council on November 1st, 2016. All present welcomed it as a community-led initiative and with an enthusiastic response.

There is now the view that the process so far could lead to an exemplar in 'bottom up' thinking that captures the essence of Central Government's 'Localism' agenda.

With that in mind, do note in my report the response of 'top down' national regeneration specialist, Lord Heseltine, to the proposals outlined: proposals that have also been welcomed by key landowners, with a meeting planned with several to explore further.

Finally, do note that the report has been written in a form that is not coldly 'professional', but in a way that
seeks to be engaging and embracing for others.

For my view is that a future that grows in a clear context from within a community succeeds, whilst one that is imposed tends always to fall short, with significant opportunities lost.

In conclusion

I am writing having appreciated the willingness of planning officers to listen and embrace as many views as is possible from within our community.

My own view is that the revised and ongoing scale of population growth now requires an urgent ‘stepping back’ with a significantly varied and enhanced approach adopted to the Local Plan.

It is only then that existing serious problems can be solved and a far bigger opportunity grasped.

It is an opportunity that must have at its core significantly robust new infrastructure and a design, development and delivery approach that is community, private/business as well as public sector led.

Thanks to this consultation process, I believe that prospect is now within reach.

My trust, therefore, is that the Inspector will regard this introductory email and the report attached to be helpful toward that end.

3.2 Vision:

unexceptionable aims and objectives. Nonetheless, adding 3200 dwellings to Eynsham’s population of 5000 does not meet the principle of “without compromising their intrinsic character, appearance and setting”.

Policy CO 1, “minimise need to travel, particularly by car” is directly contradicted by not building on the edge of Oxford and locating overspill on the edge of the Green Belt. Similar criticism of the contradiction contained in CO4, CO7.

Policy CO 2, “protect and enhance the individual form, character and identity of our towns and villages” is again directly contradicted by building 3200 dwellings at Eynsham.

CO10, many objections will focus on the inability of the proposed housing development not funding the necessary social, environmental and physical infrastructure. At best, the infrastructure, especially for movement, lags behind the provision of profitable house building. This especially evident in and around Eynsham on the A 40 and Swinford Toll Bridge. For example, any future SDA western extension of Eynsham must be preceded by the construction of a western distributor from the A 40 to the Stanton Harcourt road. The same principle applies to the proposed Garden Village: no development should be permitted until there is a convenient link to an enlarged Hanborough Station and A 40 improvement.

CO 11, this principle must be followed, viz, improved cycle lanes on the A 40 and provision of a cycle way between Eynsham and Botley.

As a result of the continued joint working arrangements through the SHMA it does now appear that the
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<td>Respondent</td>
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<td>IN 2031 - OUR</td>
<td>modifications to the Local Plan include revisions to their housing policies to include an element of Oxford’s ‘unmet’ housing need of some 2,750 dwellings</td>
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<td>Respondent</td>
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<td>VISION &gt; MAIN 9</td>
<td>This has been achieved principally by identifying two new strategic site allocations comprising West of Eynsham and north of the A40 new Eynsham (new ‘garden village’).</td>
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<td>These new sites identified in Eynsham were originally highlighted by the consultants through the joint working arrangements as part of the Post SHMA apportionment. These sites were explored as spatial options for additional housing provision and subject to sustainability assessment. This showed the value of all partners working together to prepare and agree the evidence base using shared working assumptions. They do appear therefore to be the most realistic options for seeking to help meet Oxford’s unmet housing need</td>
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<td>Support: Oxford City Council wish to support in principle the revised changes to the Local Plan and in particular:</td>
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<td>* Main Mod 4 (Para 2.9), together with those in Main Mod 9 (Vision) and</td>
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<td>Respondent</td>
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<td>* the Overall Strategy (Paras 4.17 and 4.18 and 4.18a) which show the local authority’s commitment to ‘play a role in helping to meet wider needs’ including the ‘unmet housing needs’ of Oxford (Main Mod 15) through the allocation of the Eynsham site and the Garden Village.</td>
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<td>Objection: The City Council consider that it would be helpful if a separate published housing trajectory could be provided with their AMR each year to demonstrate progress made in meeting the housing needs of the city, nomination rights for affordable housing and provision extended to OCC housing list.</td>
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<td>Given the proposed allocations are to help to contribute towards meeting Oxford’s unmet housing need it would therefore be important to understand and agree how the ‘affordable housing’ element will be provided. For example the proportion and type of affordable housing that will be delivered should as near as possible be shown to relate to Oxford’s need.</td>
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<td>Another key issue of concern is transport and infrastructure which arises from the sustainability assessment which does highlight the existing traffic and congestion problems currently experienced along the A40 leading into Oxford. In this context it will be vitally important to the delivery of this housing development that the proposed infrastructure improvements to the A40 (including new bus lanes and significantly improved cycling facilities and routes) is agreed as part of the wider transport strategy for the County and that evidence to show how it fits in with the revised Oxford Transport Strategy is essential to the successful delivery of this major project. Prior to the development taking place these transport and infrastructure mitigation measures should be agreed and appropriate funding secured to ensure that these are fully implemented before development takes place.</td>
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<td>A detailed transport assessment should therefore be required by future developers, and submitted to the County Council as Highway Authority, but also widely consulted upon with neighbouring authorities such as Oxford City Council to show how this significant amount of new housing development will meet the standards of a truly ‘sustainable development.’ It is therefore considered important that the amount of car parking is reduced to a minimum and good alternative cycling and pedestrian facilities (both routes and significantly improved surface treatment) and public transport options (Park and Ride and bus services) is provided.</td>
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<td>Public transport bus links either from the Park and Ride or other bus options should ensure that there are regular services provided to existing nearby train stations serving London such as Hanborough (Worcester – Paddington) and Oxford Parkway (Oxford to Marlyeborne)</td>
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<td>MM760</td>
<td>North Leigh Parish Council</td>
<td>North Leigh Parish Council</td>
<td>Ms</td>
<td>Kern</td>
<td>911</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>NLPC supports the Main Modification Main 9 and the overall Vision that expresses the need to protect Witney’s landscape setting and Main 12 (Policy CO15) seeking to reduce the adverse impacts of climate change and in particular flood risk.</td>
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<tr>
<td>MM417</td>
<td>Education Funding Agency</td>
<td>Samantha Powell</td>
<td>Ms</td>
<td>Powell</td>
<td>922</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 9</td>
<td>Likewise, the vision for the plan in Chapter 3 also benefits from Main Modification 9 which includes a description of a new garden village to the north of the A40. This usefully gives an overview of this proposal which mentions the provision of new schools.</td>
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<td>MM773</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>2075</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 10</td>
<td>We would agree with content of paragraph 3.4 which sets out the recognition of the need for and benefits of new development to the rural District. Hailey is categorised as a village within the Local Plan as set out within table 4.1 Settlement Hierarchy. Hailey is situated to the north-west of Witney (a Main Service Centre) and benefits from several services and facilities including a local primary school. Higher order services and facilities are available, via the X9 bus route, within Witney (which is less than 4km from the site) to the south east. Several bus services in Oxfordshire have recently been stopped however the X9 service has continued including a service to both the local railway station and the centre of Witney and this makes Hailey one of the most sustainable settlements outside of the main urban areas. The site at Hailey, as shown on the enclosed Plan at Appendix 1, demonstrates that the site is of a commensurate size to accommodate development within the village. Furthermore, it occupies a sustainable location being adjacent to the settlement boundary of the village and is not constrained by landscape designations such as Area of Outstanding Natural Beauty, Green Belt or heritage assets, as much of the District of West Oxfordshire is. The site therefore offers a logical and proportionate extension to the village of Hailey which would assist in meeting the housing needs of the District, including those of Oxford City. It is therefore considered that the site meets the requirements of appropriate scale and type, being commensurate with the capacity, role and function of the settlement of Hailey. Such a proposal is commensurate with both recent consents and proposed allocations in similar villages such as Milton-Under-Wychwood and Minster Lovell, where indeed in both cases constraints of AONB and heritage apply.</td>
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<tr>
<td>MM25</td>
<td>CPRE</td>
<td>Gareth Hammond</td>
<td>Mr</td>
<td>Hammond</td>
<td>44</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 10</td>
<td>The plans seem to pay lip-service to the need to retain the district’s rural characteristics. In the original draft local plan, 5500 houses were planned over the period to 2029 (306 p.a. over 18 years). A higher figure of 6700 houses, based on economic forecasts, was ruled out on the basis that it would put infrastructure under pressure, with potential negative sustainability impact. Now just 2 years on, we are facing a proposed target of 15950 houses by 2031 - an average of 800 p.a. How can this make sense? Organic small-scale growth in the housing stock is to be welcomed, but now virtually every settlement in the district is being saddled with exponential growth which will certainly be unsustainable.</td>
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<td>MM385</td>
<td>Combe Parish Council</td>
<td>Mrs Sharpe</td>
<td>Respondent</td>
<td>Combe Parish</td>
<td>830</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 10</td>
<td>* the increase in the size of existing strategic sites and the allocation of 15 new sites for housing. Combe Parish Council supports the proposal to develop housing at a series of key sites and rural service centres. However, we question the adequacy of the supporting infrastructure and the ability to deliver necessary improvements on an appropriate timescale given the current period of austerity and economic uncertainty. The Council specifically wishes to comment on the following modifications: MAIN 10, Para. 3.4: This paragraph emphasises the ‘capacity’ to absorb additional growth without changing the District’s distinctive rural characteristics. We would like to question the capacity to absorb the projected growth given the scale, density and location of proposed developments. The scale of development in particular is unlikely to maintain the character of rural West Oxfordshire and its villages in a way that is consistent with the West Oxfordshire Design Guide.</td>
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<tr>
<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Mrs Kent</td>
<td>Respondent</td>
<td>Rosalind Kent</td>
<td>1145</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 11</td>
<td>CO2 - We regret the missed opportunity for the WODC Local Plan to adopt a wider, longer-term vision, suitable to the needs of a changing world e.g. locally produced renewable energy and zero carbon housing. Land use strategy has become fragmented. Without an integrated strategy for the whole county, radical growth visions cannot be produced.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>Respondent</td>
<td>Pearce</td>
<td>141</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 11</td>
<td>In paragraph 3.7 CO4, the word “local” has been deleted before “housing needs”. This is significant. The Garden Village (and half the extra homes west of Eynsham), designed solely to meet Oxford City’s unmet housing need, will increase the need to travel, not reduce it.</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>Respondent</td>
<td>Pearce</td>
<td>531</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 11</td>
<td>MIN (should be part of MAIN 11), Para 3.7 CO4 Not sound The word ‘local’ has been deleted before ‘housing needs’. This is significant. The Garden Village (and half the extra homes west of Eynsham), designed solely to meet Oxford City’s unmet housing need, will increase the need to travel, not reduce it.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>Respondent</td>
<td>Pearce</td>
<td>142</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 12</td>
<td>Paragraph 3.13 CO15: The Garden Village and extra homes west of Eynsham will exacerbate the flood risk, not “contribute to reducing it”. And is the completed development going to be carbon-negative? How else will it contribute to reducing the causes and impacts of climate change?</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Mrs Jacobs (OCC)</td>
<td>Respondent</td>
<td>Jacobs</td>
<td>2290</td>
<td>&gt; SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION &gt; MAIN 12</td>
<td>Consider rephrasing to better reflect key public health priorities for health and wellbeing and community facilities: Look to maintain or improve where possible the health and wellbeing of the District’s residents through increased choice and quality of shopping, local amenities, leisure, recreation, arts, cultural and community facilities and where possible maximising opportunities for social interaction and co-location of services.</td>
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| MM61         |                         | NP              | Mr               | Pearce            | 532        | > SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION > MAIN 12 | MAIN 12, Para 3.13, CO15  
Not sound  
The Garden Village and extra homes west of Eynsham will exacerbate the flood risk, not 'contribute to reducing it'. And is the completed development going to be carbon-negative? How else will it contribute to reducing the causes and impacts of climate change? |
| MM309        |                         | Phillip Parker  | -                | Phillip Parker    | 545        | > SECTION 3 - WEST OXFORDSHIRE IN 2031 - OUR VISION > MAIN 12 | MAIN 12:  
CO12: the health and well being of residents should be increased by increased choice and quality of commuting facilities and school journeys (especially for cycling) as well as the listed improvements in leisure, recreation, arts, cultural and community facilities. |
## SECTION 4 – OVERALL STRATEGY

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<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>143</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MIN 21</td>
<td>How will building 2,200 Garden Village homes and associated roads and facilities on greenfield land, much of which is farmed sensitively and has remarkably rich wildlife and a variety of habitats, “conserve and enhance the natural and historic environment”? The greenfield area also has several Grade II listed buildings, which the Local Plan totally ignores.</td>
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<td>MM95</td>
<td>GMM</td>
<td>Miss</td>
<td>Mangley</td>
<td>245</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MIN 21</td>
<td>4.2 You cannot ‘conserve and enhance the natural and historic environment’ of Chipping Norton when you increase the size of the town by over 50%. You might not impact the historic environment because you are not building in the conservation area, but the natural environment? Of course you are not conserving that by building 2300+ more homes.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>533</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MIN 21</td>
<td>MIN. Para 4.2 Not sound How will building 2,200 Garden Village homes and associated roads and facilities on greenfield land, much of which is farmed sensitively and has remarkably rich wildlife and a variety of habitats, ‘conserve and enhance the natural and historic environment’? The greenfield area also has several Grade II listed buildings, which the Local Plan totally ignores.</td>
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<td>MM445</td>
<td>Thames Valley Police - Simon Dackombe</td>
<td>Mr</td>
<td>Dackombe</td>
<td>1002</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MIN 22</td>
<td>We would request that an additional bullet point be added to the list of factors that contribute towards sustainable development which states: “The creation of safe and secure communities where crime, and the fear of crime is reduced.”</td>
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<td>MM95</td>
<td>GMM</td>
<td>Miss</td>
<td>Mangley</td>
<td>246</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MIN 22</td>
<td>4.7 “Reducing the current reliance that is placed on the private car for journeys into, within and beyond the District by promoting opportunities for active travel through walking and cycling as well as encouraging the use of public transport” Seriously? Do you envisage that 2300+ homes in Chipping Norton will reduce the reliance placed on private cars? Chipping Norton is not a town that is easy to cycle around and walking is a hazard because of thin pavements and traffic build up at junctions and roundabouts (see CN Road traffic survey). So the 2300+ homes will bring in plenty more cars and where will the jobs be? Not in the town. Commuters will use cars and yes some will use the bus, but most will use their cars. The plan cannot claim an objective is to reduce the use of cars when so many houses are proposed to be built in Chipping Norton.</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Mr</td>
<td>Small</td>
<td>1101</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MIN 24</td>
<td>Historic England welcomes and supports the amendment to paragraph 4.32 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
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<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Mr</td>
<td>Small</td>
<td>1111</td>
<td>&gt; SECTION 4 - OVERALL</td>
<td>Historic England welcomes and supports the amendment to paragraphs 4.32 and 4.34 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required</td>
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The minor modification at paragraph 4.43 is also welcomed. It references the Infrastructure Delivery Plan which is a key document in identifying the likely future education provision across the district. It also confirms that a CIL regime is likely to be implemented during 2017.

For the reasons expanded upon in our representation to Policy OS2, we object to the amendment to Figure 4.1 to downgrade Long Hanborough from a ‘Rural Service Centre’ to a ‘Village’. This change is wholly unjustified, is not supported by the Council’s own evidence and is demonstrably unsound.

The proposed modifications to Table 4.1 are insufficient to ensure the delivery of the substantially increased housing requirement in the period to 2031, and are inconsistent with Main Modification 15 that changes the distribution strategy from a focus of ‘most’ development at the Witney, Carterton and Chipping Norton Sub-area to a ‘significant’ proportion.

In Part 1 of his Preliminary Findings (IN 015), the Inspector acknowledged that the development strategy of
the plan may not be appropriate to accommodate any significant needs arising from Oxford, and that additional greenfield sites would need to be found (para. 7.7). The Council’s response is to include in the strategy a new Garden Village in the south-east of the district, which was already targeted for a disproportionate share of the growth requirements. For reasons that are set out in the representations below, the substantially increased housing requirement to accommodate both the District’s own needs and those of the neighbouring city of Oxford necessitates a broader distribution, including to the northern sub-area of Chipping Norton to ensure that the requirement is deliverable. It also necessitates allocation of smaller, immediately deliverable sites to alleviate the shortfall in the five-year housing land supply, including the backlog of under-provision.

To ensure the delivery of the overall housing requirement during the plan period therefore necessitates a greater distribution across the district, with an increased focus on smaller sites associated with the Rural Service Centres and Villages. This is reflected in the proposed development of a new Rural Service Centre, comprising the West Oxfordshire Garden Village. However, the development of a completely new settlement is accompanied by associated risks of delivery delays/failure, there being, as yet, no certainty of Government funding for the proposed new village.

The revised strategy should therefore also provide for a greater distribution of growth to existing villages, including the identification of additional Rural Service Centres, particularly in the north of the district to provide for a more even distribution of growth, and to alleviate the over-concentration on the south-east of the district with its inherent risks of delivery failures through market saturation. This would be entirely consistent with the development strategy of the Plan which is that:

Not all growth can or indeed should go to Witney, Carterton and Chipping Norton however and there is a need for development elsewhere to help meet the unmet housing needs of Oxford City, to spread the potential benefits of growth and to help sustain the more rural parts of the district. (para. 4.15)

A prime settlement for upgrading to a Rural Service Centre is Middle Barton, which is the principal settlement in the north-east of the district, as is evident from Figure 4.1. The Chipping Norton Sub-Area does not currently contain a Rural Service Centre and is the only sub-area in the district in which one is not identified. Given the status of Middle Barton as the principal settlement in the comparatively rural north eastern part of the district, it has an important role to play as a service centre for the surrounding rural hinterland. The Sustainability Matrix 2016 contained in the Settlement Sustainability Report (November 2016) confirms that Middle Barton is one of the larger villages with a population in excess of 1,000, and has a good range of social and community facilities, including: ·

- Full-time Post Office and other shops.
- Primary School.
- Community Building.
- Public House.
- Place of Worship.
- Bus Service (including evenings).
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| MM751        | Goldfield Estates       | Goldfield Estates | -               | -          | 1849               | It is also germane that Middle Barton is within a 5 kilometre cycling distance of key employment facilities, notably the Lotus F1 facility to the south west and Enstone Airfield to the west, which support a number of businesses. In the opposite direction, it is approximately 5 kilometres from Heyford Railway Station, which is accessible by bus. Middle Barton is therefore well positioned to provide opportunities for sustainable travel for those who work in the local rural business hubs, and for those who need to travel further afield by train.  
The evidence demonstrates that it is the most sustainable settlement in the Chipping Norton Sub-Area to perform the role of a Rural Service Centre to serve the north-east of the Plan area. Whilst it does not currently have some of the facilities of the existing service centres, there are no existing settlements of such scale in the north-east of the Plan area, aside from Chipping Norton in the north-west part of the sub-area. It is therefore appropriate to focus growth on settlements that have the potential for growth that will contribute to sustaining and improving existing facilities and have potential to attract more. It is noted that the emerging Plan does not set out a minimum level of facilities that are necessary in order for a settlement to be designated as a Rural Service Centre. It is therefore entirely appropriate for the Plan strategy to designate such a centre based on its intended role rather than simply having regard to its existing scale and level of facilities.  
Middle Barton has the potential to accommodate a modest scale of growth, the rate of which is unlikely to be restrained by local market saturation given its detachment from the major growth areas to the south. It therefore offers much greater certainty of delivery, beneficial choice of housing location, and can contribute to delivering housing, including affordable housing, quickly and therefore contributing to alleviating the shortfall in the five year housing land supply.  
An allocation of housing would also assist in bolstering existing services within Middle Barton. This is supported by the PPG in which it is held to be: ...  
Important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. ...  
A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to enable viable use of these local facilities. (PPG, Paragraph: 001 Reference ID: 50-001-20160519, emphasis added). |

| MAIN 4 Para 2.9 states:  
"Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of ‘unmet’ housing need that Oxford City are unable to provide for within their own administrative boundary."  
We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification.  
We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1, 2, 13, 14, 15, 17, 23, 24, 27. |
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<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
<td>-</td>
<td>1911</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 13</td>
<td>Proposed modification- Downgrading of Long Hanborough: The proposed modifications involve the downgrading of Long Hanborough from a service centre, to a lower order village. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN13, MAIN14, MAIN15, MAIN59, MAIN66, MAIN145, MAIN149. Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. We object to proposed modifications which suggests the downgrading of Long Hanborough from a rural service centre to a village. The submission plan confirmed the rural service centres were classified as such because they benefitted from a range of services and facilities which supported the village and surrounding area. They are able to support additional homes in the short-term, while proposed growth can enhance the role of the settlement in supporting the surrounding rural area (paragraph 4.18). This approach was directly in line with the plan's objective 1 ‘strong market towns and villages’ and objective 4 ‘sustainable communities with access to services and facilities’, both of which remain un-modified. Long Hanborough retains the same services and facilities which existed at the time the plan was submitted, furthermore planning permission has been granted which allows significant expansion of the primary school (15/03341/FUL). While additional housing has been permitted no evidence has been produced to suggest additional homes would result in any harm to the character or sustainability of the settlement. The village therefore remains well placed to fulfil the role of a rural service centre. The downgrading of Long Hanborough proposed through modifications is largely unexplained and not supported by any evidence. The Council cite the creation of a ‘new’ service centre through the northern expansion of Eynsham as justifying the downgrading of Long Hanborough as the new development will need to “develop a critical mass of services and facilities” (paragraph 2.5a). We are concerned the Council’s explanation suggests an intention to restrict the development of Long Hanborough and reduce services in the village in order to encourage their replacement in the new development. A restrictive approach to development stifling an existing sustainable settlement and vibrant community is clearly at odds with the Plan’s vision, policies of the NPPF and good planning practice. The provision of an additional service centre would be entirely in line with the Plan objectives. If the development proposed north of Eynsham is to proceed it is clearly preferable that Long Hanborough maintains its status as a service centre complementing any new facilities created. The need to retain the service centre is particularly pronounced due to the unclear deliverability of the proposed site north of Eynsham, even if the site is delivered this will not be until the latter part of the plan period, therefore there is a need for services and facilities in the interim. The submitted plan set out clear objectives which the following policies sought to deliver sustainable communities. The Council seeks to deviate from this approach without explanation, evidence or proper assessment, we therefore believe this modification should be deleted.</td>
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<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
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<td>1930</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 13</td>
<td>Proposed modification- Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23,</td>
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<td>MAIN24, MAIN27, MAIN58, MAIN60, MAIN149</td>
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|               | | | | | | | MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental
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<td>change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.</td>
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<td>MAIN25:</td>
<td>We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document.</td>
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<td>The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.</td>
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<td>The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.</td>
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<td>The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.</td>
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<td>While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.</td>
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<td>MAIN27:</td>
<td>The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.</td>
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<td>We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.</td>
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<td>We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.</td>
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<td>MAIN29:</td>
<td>The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout</td>
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<td>the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfil the suggested windfall rate either the evidence, or the proposed strategy must be unsound. Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls. MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station. MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available. The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable. MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link. The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development. MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan. The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough. MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPFs encouragement of environmentally sustainable development.</td>
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<td>Brendan</td>
<td>Mr</td>
<td>O'Brien</td>
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Land at Sunset View is under the control of Empire Homes Limited, is available now and capable of delivering around 41 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

This representation (in attached file) provide further information on the Land at Sunset View and should be read in conjunction with Edgars Limited’s representations regarding housing supply which are not repeated here.

INTRODUCTION AND SUMMARY

i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Empire Homes Limited who have land north of the A44 and south of the Banbury Road, Chipping Norton under their control. The land extends to approximately 42 hectares and is identified on the plan attached as Appendix 1 to these representations.

ii. Empire Homes Limited object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30), CN1 (MM140) and CN2 (MM143) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.

iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only 2.7 year supply can be demonstrated. Edgars consider that additional sites are required to be allocated to ensure sufficient housing land supply.

iv. Land north of the A44 and south of the Banbury Road, Chipping Norton is available and capable of delivering residential development in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. The following representations provide further information on the land north of the A44 and south of the Banbury Road, Chipping Norton.

1.0 DELIVERY AT EAST CHIPPING NORTON SDA (Policy CN1, MM138-MM140)

1.1 The East Chipping Norton allocation has been increased from about 600 dwellings at Tank Farm south of the London Road to 1,400 dwellings including 1,200 dwellings south of London Road and 200 north of London Road. The SDA now includes the provision of an Eastern Link Road.

1.2 Limited evidence has been published to demonstrate and assess the impacts of the increased allocation. The previous assessment of Strategic Site Options (Examination Document Ref OTH1) has not been updated. This provides a comprehensive overview of the site and a summary of the site constraints and impacts.

1.3 There would appear to be no evidence document which provides a summary of the modified East Chipping Norton SDA and its constraints. The SHELAA assesses a number of component sites but there is no expression of the overall size of the site and its developable area to ascertain whether delivery is realistic.

1.4 Previous landscape evidence was prepared for the Council by Kirkham Landscape Planning, the
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<td>MM722</td>
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<td>Graham Flint</td>
<td>Mr Flint</td>
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<td>The proposal to remove Long Hanborough from the Rural Service Centres and designate it as a village is unsound for the following reasons: 1. Its long history as a Service Centre Long Hanborough has been designated as a Service Centre for a long time. It is designated as a Service Centre in the West Oxfordshire Local Plan 2001 - 2011 (Figure 5.2) and was proposed to be designated as a Rural Service Centre in the submission West Oxfordshire Local Plan 2031 (Table 4.1). The National Planning Policy Framework (NPPF) requires that 'the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence,' (para 182) and the Council has long accepted that there is sufficient evidence to justify the designation of Long Hanborough as a Rural Service Centre. 2. Wide range of services and facilities There is ample evidence that Long Hanborough has a wide range of services and facilities and therefore merits its Rural Service Centre status. These include a new spacious doctors’ surgery for which planning permission was obtained in July 2016 and which will be provided as part of the residential development on the land south of Witney Road granted planning permission under appeal ref: APP/D3125/W/15/3129767. The new doctors’ surgery is required to be provided under conditions 15 &amp; 16 of the permission within 2 years of commencement of the development and to remain in that specified use. This will replace the current cramped doctors’ surgery, which is well below NHS England standards of provision for the population it serves, and not only improve facilities for existing residents, but also provide the capacity for the provision of more homes in Long Hanborough. Other services and facilities include a primary school; petrol station; churches; post office; two Co-op food stores; dental practice; playing fields; spacious village hall; nursery;</td>
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beauty salon; two public houses; fish and chip shop; substantial employment estate (circa 10.72 hectares) and a mainline train station (the Cotswold Line).

3. Close relationship to the Oxford and Oxfordshire City Deal and the 'Knowledge Spine'

A key part of the case for Long Hanborough to remain as a Rural Service Centre is its close relationship to the City Deal. The Oxford and Oxfordshire City Deal is part of the Government’s initiative to devolve powers locally in exchange for local authorities taking on responsibility for creating economic growth in their areas. The Oxford and Oxfordshire City Deal aims to promote growth by maximising the existing educational, pharmaceutical and science assets in order to promote Oxford and Oxfordshire’s status as a prosperous economic area.

The City Deal, is a cooperative venture, which will be delivered through the Oxford Local Enterprise Partnership (LEP) bringing together other bodies and institutions, including Oxford City Council, Cherwell District Council, South Oxfordshire District Council, Vale of the White Horse District Council, West Oxfordshire District Council, Oxfordshire County Council, Oxford Brookes University and Oxford University. The area of the City Deal is County wide.

The proposed development at Long Hanborough is very close to the 'Knowledge Spine' identified in the City Deal, which stretches from Science Vale, near Didcot to Bicester, with Oxford at its heart. Paragraph 9.5.11 of the Local Plan acknowledges this, stating that the proximity of the Eynsham-Woodstock sub-area to major employment growth areas ‘present a diverse range of opportunities within close distance including within the Oxfordshire knowledge spine suggesting the Eynsham Woodstock area has a positive role to play in terms of economic development.’ Two key proposed employment sites that are close to Long Hanborough, and which housing there would help to serve, are the Science Park at Begbroke, which Cherwell District Council has identified in its Local Plan 2011 - 2031 (adopted July 2015) policy Kidlington 1 for Accommodating High Value Employment Needs and the Northern Gateway, which adjoins the A44 at the northern edge of Oxford, which Oxford City Council has allocated in its Northern Gateway Area Action Plan (adopted July 2015) policy NG2 for up to 90,000 m2 of employment uses that directly relate to the knowledge economy and include science and technology; research; bio-technology; and spin off companies from the universities and hospitals.

The City Deal commits the participating local authorities to accelerate the delivery of 7,500 homes across the county; and recognizes that the provision of quality housing close to the employment areas is fundamental to the delivery of innovation led growth.

The importance of housing provision to the achievement of the objectives of the City Deal is emphasized in the section on 'Planning for Development,' that states: 'The City Deal should enable further economic growth. However, this success has placed pressure on the local housing market. Oxford and Oxfordshire have overwhelming evidence that the lack of choice and availability of housing and affordable housing is a major barrier to growth. Oxford and other areas in the county are identified as among the least affordable locations in the country, and significantly ahead of London. The universities and businesses in the knowledge economy identify that housing is a significant barrier to the recruitment and retention of staff, including senior management and researchers. More housing is essential for the future of the knowledge economy in Oxford and Oxfordshire. City Deal partners recognise that a more strategic and ambitious approach towards housing growth is essential to the future of the knowledge economy in Oxford and Oxfordshire, and will ensure that the area continues to be a dynamic place to invest and work.'
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emphasizes the importance of it continuing to be designated as a Rural Service Centre.

4. Recent Rail Improvements & Further Improvements Detailed in the Main Modifications will enhance Long Hanborough's role as a Rural Service Centre

There is therefore absolutely no evidence to demonstrate that it should be downgraded to village status. In fact, the service centre role performed by Long Hanborough has improved in recent years due to the improvements that have taken place in the rail service with further improvements proposed.

The presence of the train station at Long Hanborough is virtually unique in West Oxfordshire. None of the three main settlements of Witney; Carterton and Chipping Norton has a train station and the only other service centre which has one is Charlbury, which is located within the Cotswolds Area of Outstanding Natural Beauty (AONB) where development is therefore constrained in accordance with the advice in the National Planning Policy Framework (paragraphs 115 - 116). At Long Hanborough there is a regular direct train service to Oxford, Didcot, Reading, Slough, London and Worcester, with the journey to Oxford only taking ten minutes. This is of particular significance, as paragraph 9.5.34 of the Submission Local plan acknowledges that the Eynsham/Woodstock sub area, within which Long Hanborough is located, has 'very strong linkages with Oxford, with a high proportion of residents working in the city and much of the economic activity forming part of the wider Oxford city region economy.'

The proposed main modification 66 reinforces the importance of the Hanborough train station with paragraph 7.57(a) stating that: 'passenger growth on the Cotswold line has been significant with exceptional growth at Hanborough (up 239%).' It states that 'There is the potential for further growth with the introduction of an hourly service in December 2018. New trains will bring increased capacity with additional seating and will also achieve faster journey times, with some services from Hanborough reaching London Paddington in 63 minutes.'

There are also proposals for further improvements with paragraph 7.57 (b) stating that:

'LTP4 identifies a strategic aspiration to develop Hanborough Station as a transport hub to help reduce congestion on the A40 as part of an overall package of public transport measures. To fulfil its potential, the station will require a larger car park, footbridge and new platform so any trains extended from Oxford can terminate and turnaround. To fully realise the potential of the railway, further redoubling will be required at the eastern and western ends of the line, between Wolvercote Junction and Hanborough, and from west of Evesham towards Pershore. This would allow up to three trains per hour to Hanborough and/or Charlbury and two trains per hour between London and Worcester, with a journey time under two hours.'

These points are also reiterated in paragraph 9.5.16 which refers to Hanborough station as being 'one of the District’s largest and most well-used stations. Car parking facilities have recently been expanded at Hanborough to improve capacity and there are aspirations for further station improvements,' and then goes on to repeat the improvements outlined in paragraph 7.57 above.

Paragraph 9.5.34 also states that: 'there is potential to develop Hanborough Station as a stronger transport interchange, with additional parking, and improved access from the south.'

These improvements will further improve the sustainability of Long Hanborough and mean that it is far more accessible by public transport, particularly to Oxford, than any other service centre in West Oxfordshire, apart from Charlbury, which is in the AONB. This constant reiteration in the Main Modifications of the
importance of Hanborough station and the further improvements planned for it, prove that Long Hanborough certainly merits its designation as a Rural Service Centre.

The proposed Main Modifications, however, go on to state in paragraph 7.57c that:

'In light of the proposed improvements to Hanborough Station a key element of the proposed garden village to the north of Eynsham will be the provision of improved connectivity between the new settlement and the station particularly by bus and cycle.'

Given, that Long Hanborough is located adjoining the station there is already excellent connectivity with the train station, with a pedestrian and cycle path through the settlement providing access to it. It is also located closer to the station than the proposed garden village. With the recent and proposed improvements to the station it therefore clearly performs the role of an important transport hub and should retain its status as a Rural Service Centre.

5. Scoring in the West Oxfordshire Local Development Framework Settlement Sustainability Report (November 2016)

The Council has prepared a Settlement Sustainability Report (November 2016), which gives weighted and unweighted scores. In both Hanborough scores above all of the villages, scoring the same as the Rural Service Centre of Bampton and 2 points more than Bampton in the Weighted Score. However, Long Hanborough’s position as a Rural Service Centre is even more significant than this indicates as there are three different positive indicators for a bus service which are:

• Daytime bus service;
• Evening bus service;
• Bus service every 30 minutes

However, for the train there is only one score for a railway station in the parish. At Hanborough Station there is an evening train service, with the last train arriving at 23.02. The train also only takes 10 minutes from Oxford station, giving Hanborough a high level of accessibility, so the rail service clearly merits a higher score than the unweighted score of 1 or the weighted score of 2.

With regard to the weighted score, there is a strong argument that having a railway station in the parish should result in a weighted score of 4 being given, as is the case where a Post Office; Shops; Primary School; Doctors’ Surgery and Local Employment Opportunities are present.

6. The Planning Inspector Philip Asquith who considered the appeal into the proposed residential development and doctors’ surgery on land south of Witney Road, Long Hanborough considered that Long Hanborough merited designation as a Rural Service Centre

The Inspector who determined the planning appeal relating to land south of Witney Road, Long Hanborough, (APP/D3125/W/15/3129767 & 12/1234/P/OP) also considered Long Hanborough to merit the designation as a Rural Service Centre, stating that:

49. ‘Long Hanborough is one of the nine larger settlements in the district classified in the WOLP as Service
Centres. These, by definition, have a good range of facilities, services and transport accessibility to support their immediate communities as well as neighbouring hinterlands. This is confirmed by the Council’s Settlement Sustainability Report, revised in December 2013. The village is also defined as one of six Rural Service Centres within the emerging Local Plan 2031. The Statement of Common Ground between the appellant and the Council notes that Long Hanborough is a suitable location to accommodate significant residential growth. There is a range of local services, including a small business park adjacent to the station, which allows a proportion of travel demand (alternative to the car) to be met locally.

50. The village is only one of two settlements within the category of Main Towns and Rural Service Centres in the district to have a mainline station. The rail line provides direct services to London, Oxford, and Worcester . . . It is apparent that there is a commitment to the introduction of new trains with greater capacity, with a longer-term commitment to increase the number of trains from Long Hanborough to Oxford, cut journey times to London and undertake enhancements to the station’s facilities.

Counter Arguments

There is therefore abundant evidence that Long Hanborough merits its Rural Service Centre designation. There are two arguments against its designation which are the Council’s statement in paragraph 9.5.3a that:

‘Given the residential schemes of 169 homes and 50 homes recently approved, the limited role of the settlement and its landscape setting, it is only suitable for very modest levels of further development.’

The other being the argument made in the officers’ report to Council on the 26 October 2016, (paragraph 5.9), that the proposed designation of the West Oxfordshire Garden Village would mean that there would be too many Rural Service Centres in this part of Oxfordshire.

Neither of these arguments is considered to be a valid reason to remove Long Hanborough’s status as a Rural Service Centre. In the first place the Council is itself proposing in the main modifications to designate two additional sites at Long Hanborough for residential development, these being land at Myrtle Farm, Long Hanborough for 50 homes under policy EW1 f and the other being land at Oliver’s Garage, Long Hanborough for 25 dwellings under Policy EW1 g. There is also land north of Witney Road, Long Hanborough, which is on the opposite side of the road to the 169 dwellings granted approval on appeal, which could be allocated for residential development without a significant impact on its setting, as the issues are very similar to those relating to the land south of Witney Road. (Further consideration is given to this issue in the representations submitted in relation to Main Modifications 27; 160; 170; 171; 172, 173, 174 & 175 seeking the designation of this site.) It is therefore not considered to be true that Long Hanborough ‘is only suitable for very modest levels of further development.’

With regard to the argument with regard to the proximity of the West Oxfordshire Garden Village, this argument is made in the officers’ report to Council on the 26 October 2016 which stated in paragraph 5.9 that:

It is recommended that the proposed Garden Village should be identified as a future rural service centre. The Garden Village would then replace Long Hanborough which would no longer be a defined rural service centre. This reflects the significant scale of development proposed in the Garden Village, the key role it will play as a transport and business hub, and the relatively limited scope for further development in Long Hanborough. It also avoids an over concentration of rural service centres in this part of the District.
However, there are two reasons why it should not replace Long Hanborough as a Rural Service Centre. One is that the proposed Garden Village site currently consists of fields, with no services and facilities and is not therefore a Rural Service Centre. Indeed, given the significant planning issues; funding and infrastructure that is required for a new settlement, the West Oxfordshire Garden Village may never come to fruition or may develop much more slowly than currently envisaged and so not perform a Rural Service Centre function during the entire plan period. Even on the most optimistic trajectory it is clear that it will not perform the role of a Rural Service Centre for many years.

Secondly it will effectively form an extension to Eynsham. Indeed, paragraph 9.5.40r of Main Modification 153 states that:

‘By ensuring good links across the A40 (e.g. an iconic feature bridge as suggested in the Council’s Garden Village expression of interest) existing residents of Eynsham to the south will be able to access the Garden Village to enjoy the services, facilities and amenities it will offer. Conversely, residents of the Garden Village will be able to access Eynsham and its services and facilities, thereby playing a complementary rather than a competing role.’

It will therefore effectively form an extension to Eynsham, in the same way that other settlement extensions such as the Littlemore Science Park and Blackbird Leys or Barton form part of Oxford, notwithstanding their separation from other parts of the city by the A4142 and the A40 respectively.

Indeed, by designating it as a separate Service Centre means that there would be two contiguous Service Centres. It makes much more sense to have Eynsham and the proposed Garden Village as one Rural Service Centre and Long Hanborough as another, as Long Hanborough serves a different area of the District to Eynsham.

Conclusion
For the reasons set out above it is considered that Long Hanborough is a highly sustainable location for development and therefore the designation of Long Hanborough as a Rural Service Centre, as proposed by the Council in the original submission West Oxfordshire Local Plan 2031 ‘is the most appropriate strategy when considered against the reasonable alternatives’, (NPPF, para 182) based on the Council’s own evidence base and that it would be wrong for it to be downgraded to a village.

We note that Long Hanborough has been demoted to the status of a ‘Village’. Previously it was a Rural Service Centre. This re-classification is justified on the basis of the new allocation for the West Oxfordshire Garden Village, but it is unclear why the allocation of the West Oxfordshire Garden Village should automatically lead to the re-classification of Long Hanborough. If the settlement has the services and amenities to warrant classification as a service centre then it is unclear why this needs to change.

As a ‘village’ only a limited amount of housing development will be allowed in Long Hanborough. We note that Policy OS2 (MAIN 16) may allow for an allocation and in Policy EW2 (MAIN 183) we note that 75 dwellings appear to be allowed on two sites. Long Hanborough may be able to support more development. It has a railway station with connections to Oxford and London. As such it is a sustainable location to take an allocation for more housing. Changes to Government planning policy may encourage an increase in the supply of housing around rail stations. As we have argued above under MM8, increasing the number of sites of all sizes is key to sustaining delivery, so taking advantage of as many opportunities as possible across the district would help to provide a flexible supply of land and would help to ensure that the overall requirement
Similarly, we are surprised to read that Ascott-under-Wychwood is also designated a village rather than a rural service centre. The consequence of this is no specific, guaranteed, housing allocation. Ascott-under-Wychwood also has a rail station with regular daily train services to London Paddington. As a sustainable location with a store, post office, library, pubs, bus services, etc the Council should consider allocating a housing number to this settlement.

The proposed modifications to Table 4.1 are insufficient to ensure the delivery of the substantially increased housing requirement in the period to 2031, and are inconsistent with Main Modification 15 that changes the distribution strategy from a focus of ‘most’ development at the Witney, Carterton and Chipping Norton Sub-area to a ‘significant’ proportion.

In Part 1 of his Preliminary Findings (IN 015), the Inspector acknowledged that the development strategy of the plan may not be appropriate to accommodate any significant needs arising from Oxford, and that additional greenfield sites would need to be found (para. 7.7). The Council’s response is to include in the strategy a new Garden Village in the south-east of the district, which was already targeted for a disproportionate share of the growth requirements. For reasons that are set out in the representations below, the substantially increased housing requirement to accommodate both the District’s own needs and those of the neighbouring city of Oxford necessitates a broader distribution, including to the northern sub-area of Chipping Norton to ensure that the requirement is deliverable. It also necessitates allocation of smaller, immediately deliverable sites to alleviate the shortfall in the five-year housing land supply, including the backlog of under-provision.

To ensure the delivery of the overall housing requirement during the plan period therefore necessitates a greater distribution across the district, with an increased focus on smaller sites associated with the Rural Service Centres and Villages. This is reflected in the proposed development of a new Rural Service Centre, comprising the West Oxfordshire Garden Village. However, the development of a completely new settlement is accompanied by associated risks of delivery delays/failure, there being, as yet, no certainty of Government funding for the proposed new village.

The revised strategy should therefore also provide for a greater distribution of growth to existing villages, including the identification of additional Rural Service Centres, particularly in the north of the district to provide for a more even distribution of growth, and to alleviate the over-concentration on the south-east of the district with its inherent risks of delivery failures through market saturation. This would be entirely consistent with the development strategy of the Plan which is that:

Not all growth can or indeed should go to Witney, Carterton and Chipping Norton however and there is a need for development elsewhere to help meet the unmet housing needs of Oxford City, to spread the potential benefits of growth and to help sustain the more rural parts of the district. (para. 4.15)

A prime settlement for upgrading to a Rural Service Centre is Middle Barton, which is the principal settlement in the north-east of the district, as is evident from Figure 4.1. The Chipping Norton Sub-Area does not currently contain a Rural Service Centre and is the only sub-area in the district in which one is not identified. Given the status of Middle Barton as the principal settlement in the comparatively rural north eastern part of the district, it has an important role to play as a service centre for the surrounding rural hinterland. The Sustainability Matrix 2016 contained in the Settlement Sustainability Report (November 2016) confirms that Middle Barton is one of the larger villages with a population in excess of 1,000, and has a good range of social and community facilities, including:
Full-time Post Office and other shops.

Primary School.

Community Building.

Public House.

Place of Worship.

Bus Service (including evenings).

It is also germane that Middle Barton is within a 5 kilometre cycling distance of key employment facilities, notably the Lotus F1 facility to the south west and Enstone Airfield to the west, which support a number of businesses. In the opposite direction, it is approximately 5 kilometres from Heyford Railway Station, which is accessible by bus. Middle Barton is therefore well positioned to provide opportunities for sustainable travel for those who work in the local rural business hubs, and for those who need to travel further afield by train.

The evidence demonstrates that it is the most sustainable settlement in the Chipping Norton Sub-Area to perform the role of a Rural Service Centre to serve the north-east of the Plan area. Whilst it does not currently have some of the facilities of the existing service centres, there are no existing settlements of such scale in the north-east of the Plan area, aside from Chipping Norton in the north-west part of the sub-area. It is therefore appropriate to focus growth on settlements that have the potential for growth that will contribute to sustaining and improving existing facilities and have potential to attract more. It is noted that the emerging Plan does not set out a minimum level of facilities that are necessary in order for a settlement to be designated as a Rural Service Centre. It is therefore entirely appropriate for the Plan strategy to designate such a centre based on its intended role rather than simply having regard to its existing scale and level of facilities.

Middle Barton has the potential to accommodate a modest scale of growth, the rate of which is unlikely to be restrained by local market saturation given its detachment from the major growth areas to the south. It therefore offers much greater certainty of delivery, beneficial choice of housing location, and can contribute to delivering housing, including affordable housing, quickly and therefore contributing to alleviating the shortfall in the five year housing land supply.

An allocation of housing would also assist in bolstering existing services within Middle Barton. This is supported by the PPG in which it is held to be: ...

important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. ...

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to enable viable use of these local facilities. (PPG, Paragraph: 001 Reference ID: 50-001-20160519, emphasis added).
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| MM756        | Cantay Estates          | Cantay Estates | -               | Cantay Estates    | 1912       | > SECTION 4 - OVERALL STRATEGY > MAIN 14 | Proposed modification- Downgrading of Long Hanborough: The proposed modifications involve the downgrading of Long Hanborough from a service centre, to a lower order village. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN13, MAIN14, MAIN15, MAIN59, MAIN66, MAIN145, MAIN149.

Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.

We object to proposed modifications which suggests the downgrading of Long Hanborough from a rural service centre to a village. The submission plan confirmed the rural service centres were classified as such because they benefitted from a range of services and facilities which supported the village and surrounding area. They are able to support additional homes in the short-term, while proposed growth can enhance the role of the settlement in supporting the surrounding rural area (paragraph 4.18). This approach was directly in line with the plan's objective 1 'strong market towns and villages' and objective 4 'sustainable communities with access to services and facilities', both of which remain un-modified.

Long Hanborough retains the same services and facilities which existed at the time the plan was submitted, furthermore planning permission has been granted which allows significant expansion of the primary school (15/03341/FUL). While additional housing has been permitted no evidence has been produced to suggest additional homes would result in any harm to the character or sustainability of the settlement. The village therefore remains well placed to fulfil the role of a rural service centre.

The downgrading of Long Hanborough proposed through modifications is largely unexplained and not supported by any evidence. The Council cite the creation of a ‘new’ service centre through the northern expansion of Eynsham as justifying the downgrading of Long Hanborough as the new development will need to “develop a critical mass of services and facilities” (paragraph 2.5a).

We are concerned the Council’s explanation suggests an intention to restrict the development of Long Hanborough and reduce services in the village in order to encourage their replacement in the new development. A restrictive approach to development stifling an existing sustainable settlement and vibrant community is clearly at odds with the Plan’s vision, policies of the NPPF and good planning practice.

The provision of an additional service centre would be entirely in line with the Plan objectives. If the development proposed north of Eynsham is to proceed it is clearly preferable that Long Hanborough maintains its status as a service centre complementing any new facilities created. The need to retain the service centre is particularly pronounced due to the unclear deliverability of the proposed site north of |
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<td>MM756 &gt; Cantay Estates</td>
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<td>Cantay Estates</td>
<td>1931</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 14</td>
<td>Proposed modification- Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making. The proposed ‘Garden Village’ is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification. The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process. A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance. Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site. Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.</td>
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<td>MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.</td>
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<td>MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.</td>
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<td>MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.</td>
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<td>The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites. The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions. The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required. While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.</td>
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<td>MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.</td>
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<td>We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.</td>
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<td>We consider Long Hanborough to be a suitable location for development as it benefits from an excellent</td>
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range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.

MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.
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| MM772         | Spitfire Homes          | Spitfire Homes  | -                | Spitfire Homes    | 2066       | > SECTION 4 - OVERALL STRATEGY > MAIN 14 | Main Modification 14 – Table 4.1  
Policy OS2 is updated to reflect allocations made through the Proposed Modifications. Spitfire Homes supports that the ‘villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities’. This principle is in line with paragraph 55 of the NPPF. Nevertheless, we comment further below on the quantum of allocated sites and the benefit that directing further development to the village locations could have in respect of meeting housing targets.

Our client acknowledges the amendments to the Settlement Hierarchy at Table 4.1. Standlake continues to be appropriately classified as a ‘village’ location, the sustainable credentials of which are reported by the Council’s Settlement Sustainability Report (SSR, November 2016). The SSR reports both an un-weighted and weighted score for the settlements assessed. In both scenarios the sustainable credentials of Standlake are recognised, with the settlement performing strongly and ranked highly within the ‘village’ tier (scoring 11 and 30 respectively).

Further, it is noted that the settlement of Standlake is relatively unconstrained by protective policy designations. The village lies outside of the Oxford Green Belt and is not subject to either Area of Outstanding Natural Beauty or Conservation Area constraints. The capacity of the settlement to deliver development, as demonstrated by Spitfire Homes land interest, aligns neatly with its sustainability credentials. In turn, development at Standlake would assist the Council in fulfilling the principle of Policy OS2, that is ‘locating development in the right places’.  

The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.

MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPF’s encouragement of environmentally sustainable development.

The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use all together. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.
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<td>MM780</td>
<td>North A40 Land Consortium</td>
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<td>2121</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 14</td>
<td>Proposed Main Modification 14 reflects the proposed designation of the West Oxfordshire Garden Village north of the A40 near Eynsham as a new rural service centre, and the associated re-classification of Long Hanborough as a village. This amendment is supported by the Consortium in recognition of the range of services and facilities which could be delivered at the proposed Garden Village site.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2278</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 14</td>
<td>Long Hanborough should be included in the Plan as a rural service centre, for reasons stated in para 2.5 Well connected Aston Bladon Brize Norton Cassington Combe Curbridge Ducklington Enstone Great Rollright Minster Lovell North Leigh Over Norton Standlake Stonesfield Tackley Long Hanborough (should be in the Service Centre list) Partly connected Alvescot Chadlington Churchill Clanfield Finstock Freeland Hailey Kingham Not connected Filkins Fulbrook Langford Leafield Middle Barton Milton-u-Wychwood Shipton-u-Wychwood Stanton Harcourt Woottton Ascott u Wychwood</td>
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### Status of 'village' needs some differentiation - some of these localities are quite well-located on existing transport corridor, so these villages are connected by hourly commercial bus routes, or better, which could be improved through developer contributions and growth in population/patronage and then there are other villages which have no commercial bus service, or likelihood of commercial bus services

The suggested hierarchy of villages, according to 'connectivity' by commercial bus services follows:

- Well connected – at least an hourly daytime bus service
- Partly connected – at least 5 commercial bus services per day
- Not connected – no commercial bus service.

### Introduction and Summary

1. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Lagan Homes who have land under their control off School Hill, Minster Lovell. The land extends to 2.5ha and is identified on the plan attached as Appendix 1 to these representations.

2. Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that insufficient sites for housing have been identified to provide for a five year
supply of housing in accordance with national policy.

iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply.

iv. Land at School Lane is under the control of Lagan Homes, is available now and capable of delivering around 25 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing between 2016-2021 and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. Lagan Homes object to Table 4.1 and the reference to Minster Lovell ‘south of the Burford Road’ (MM14). There is no reason why Land at School Lane and north of the Burford Road is in anyway less sustainable in locational terms than other land on the edge of the village.

vi. The following representations provide further information on the Land at School Lane and should be read in conjunction with Edgars Limited’s representations regarding housing supply which are not repeated in detail in these representations.

1.0 LAND AT SCHOOL LANE, MINSTER LOVELL

1.1 Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that Land at School Lane should be allocated for around 25 homes to help address this deficiency.

Site and Surrounding Area

1.2 The site lies adjacent to the village of Minster Lovell and the B4047 Burford Road some 3 miles (5km) west of Witney and 4 miles (6km) north of Carterton. There is an off-road cycle path to Witney (within reasonable cycling distance) and an hourly bus service to Witney. The village also has a number of amenities including a small shopping parade, Post Office, Primary School, Public House and Butcher. There are also several businesses along the Brize Norton Road.

1.3 The site is a single 2.5ha open grassland field immediately north of the Burford Road and west of School Lane. It is part of the north facing slope of the Windrush Valley. A site plan is attached at Appendix 1.

1.4 The site lies some 1m below the Burford Road and is screened by a strong hedgerow along the road frontage such that the open nature of the site is not readily perceptible from this frontage.

1.5 On the southern side of Burford Road is some modern development which is also mostly set back from the road frontage. The White Hart Public House (Listed Grade II) along with the War Memorial and Methodist Church frame the Brize Norton Road junction opposite the site. 1.6 There is a farm access in the south western corner and a strong hedgerow bounds to the west along with a Thames Water pumping station.
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<td>1.7 School lane bounds to the east. The lane lies some 1.5m below the site and views are filtered through by boundary vegetation.</td>
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<td>1.8 School Lane leads to Little Minster. College Farm within Little Minster lies at the southern end of the site and there is a scattering of modern and historic buildings along School Land and School Hill.</td>
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<td>1.9 School Lane and College Farm fall within a Conservation Area. A Conservation Area Appraisal has been prepared by the Council. The site is not identified in the appraisal as where there is a notable sensitive view into or out of the Conservation Area. Buildings adjacent the site are identified as Locally Listed including College Farm and the Old School.</td>
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<td>1.10 The site forms part of the northern slopes of the Windrush Valley and falls within the Cotswold AONB. The West Oxfordshire Landscape Assessment (WOLA) identifies the site as part of the Upper Windrush Character Area and part of Semi-Enclosed Valley Side Farmland which is noted to be sensitive to views within an across the valley but where there may be limited opportunities to accommodate small scale development within a strong landscape structure. The settlement pattern identifies scattered villages along the valley with Charteville (New Minster) a notable exception being sited on higher land.</td>
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<td>1.11 The site is well screened from the Burford Road, but there are some more immediate views through boundary hedgerows from School Lane. The site is appreciable but not prominent in middle distance views back from the opposite side of the valley just south of Ashhall Leigh. From here existing dwellings at Little Minster and north of the Burford Road are well screened by existing trees.</td>
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<td>1.12 There is no planning history of direct relevance to the site. The site lies within Flood Zone 1 Low Risk.</td>
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<td>1.13 Access is available to School Lane and to the Burford Road. Further technical work is underway to establish the most appropriate access point.</td>
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<td>1.14 Lagan Homes have only recently acquired an interest in the site and as such the site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELAA).</td>
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<td>1.15 Lagan Homes are in the process of undertaking technical and development design work to inform a planning application and this is likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as of particular relevance to the potential allocation of the site.</td>
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<td>1.16 Minster Lovell is identified as a village in the Local Plan 2031. Draft WOLP Policy H2 permits new housing adjacent to villages to meet housing needs. As such housing development on the site would be acceptable in principle.</td>
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<td>1.17 Draft Policies H2 and WIT4 seek delivery of 4,400 homes in the Witney Sub Area including Minster Lovell. Delivery is proposed through three Strategic Development Areas (SDAs - West, East and North Witney)</td>
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1.18 There is residual windfall requirement of 304 homes within the Witney Sub- Area.

1.19 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which will likely result in continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead in times of SDAs, addressing the current supply deficiencies is best achieved through allocating additional non-strategic developments such as Land at School Lane, Minster Lovell.

1.20 Land at School Lane lies adjacent to Minster Lovell, close to amenities and public transport links. The village bus stops, public house and shops are located on the opposite site of the Burford Road to the site in very close proximity. The village school lies within 500m to the south. The site is also within cycling distance of the West Witney employment areas (2km) and Witney Town Centre (5km). In locational terms, it is sustainable. Indeed, the site lies closer to village amenities than the proposed allocation west of the village.

1.21 It is noted that Table 4.1 of the plan includes Minster Lovell as a village within the settlement hierarchy but this has been modified to (MM 14) to include reference to Minster Lovell ‘south of the Burford Road’. Lagan Homes object to this modification.

1.22 In Edgars opinion, the development of Land at School Lane and north of the Burford Road can comply with Policy H2 in being adjacent to a village in the settlement hierarchy.

1.23 There is no reason why land at School Lane, north of the Burford Road, is in any way less sustainable in locational terms than other land adjoining the village. Indeed, land at School Lane is in closer proximity to many of the villages amenities, including the school, shops and public house than other land on the edge of the village.

Village character, AONB landscape and Conservation Area

1.24 Draft Policy OS2 Locating development in the right places states that villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. Development should form a logical complement to the settlement pattern, protect landscape character and settlement identity.

1.25 The site does not appear to have been part of the historic Chartist settlement for which Minster Lovell is known. The site does lie within the Cotswolds AONB and adjacent to a Conservation Area.

1.26 The site is not identified in the Council’s Conservation Area appraisal as where there is a notable sensitive view into or out of the Conservation Area.

1.27 Views of the site are already filtered by vegetation and topography. The WOLA identifies that this area of the Windrush Valley can accommodate development within a strong landscape structure. Indeed, in views from across the valley, existing landscape features act as a screen to existing dwellings on the Burford Road.
1.28 The setting of the Conservation Area and AONB can be preserved and enhanced through a low density but high quality development within a strong and extensive landscape structure. Although the extent of the land is 2.5ha, only around 25 dwellings are proposed leaving significant scope for open space and landscaping.

1.29 In Edgars opinion, a development of this scale does not comprise ‘major’ development for the purposes of NPPF paragraph 116 and that a development within a strong landscape structure will not have a significant impact on the landscape and scenic beauty of the wider AONB.

1.30 A low density development within a strong landscape structure will also respects the settlement pattern and separate identities of Little Minster and Minster Lovell.

1.31 Although further work is being undertaken, Edgars consider that development can be achieved on the site which makes an important contribution to meeting housing land supply in a sustainable location, without significant impact on the settlement character, AONB or adjoining Conservation Area.

1.32 Further detailed technical information and development design work is likely to be available during the next stages of the WOLP 2031 Examination.

ASCOTT-UNDER-WYCHWOOD PARISH COUNCIL
RESPONSE TO WODC DRAFT LOCAL PLAN 2031 CONSULTATION

Ascott-under-Wychwood Parish Council notes that our village has actually been named for the first time in the Draft Local Plan 2031 and has been moved to the ‘Villages’ category. We are very concerned that this has been done apparently arbitrarily and without any consultation at all with the Parish Council.

The consequence is that certain statements which were acceptable last year (when only 2 Wychwood villages were named) are no longer accurate with Ascott-u-W included. Ascott is a village one half and one third of the size of the other two Wychwood villages and with far fewer amenities. It is not accurate to include Ascott in the general Wychwood statements written last year. This places us in the difficult position of strongly objecting to statements which are not among the amendments but our objections do flow from the original critical amendment – that of naming Ascott-under-Wychwood in the Villages category.

In particular, we feel that the impression is given over and over again that Ascott-u-W is reasonably well served by public transport. This is blatantly not the case and the situation has got worse in the past 6 months with the cuts in bus subsidies (as indicated in our response to the WODC Planning Services Parish Survey 2016). Ascott-u-W also appears to have a Post Office (Friday afternoon in Tiddy Hall does not constitute a Post Office) – and a smart railway station with a reasonable service (when in fact it has 1 train each way on weekdays only, too late in the morning for London commuters and even Oxford schools).

We are extremely concerned that an inspector, if considering a planning application appeal, might refer to the WODC Local Plan 2031 and think that Ascott-under-Wychwood has amenities equal to Shipton and Milton and we would ask that the Draft Local Plan be amended to reflect the true picture.

Stagecoach objects to the removal of the Local Service Centre designation from Long Hanborough.
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| West          |                         |                 |                  |                   | MAIN 14    |                   | The Council's own evidence base strongly supports the categorisation, which is one of a number of important considerations influencing the development strategy. Removing this settlement from the Category is inconsistent with the evidence base and thus appears arbitrary, and consequently unsound.  
The village has a range of services, but most significantly is one of the main railheads serving the District. This is itself recognised elsewhere in the Draft Plan, at paragraph 9.5.48 in particular, which seeks to substantially build upon the potential to make the settlement an interchange between rail services and other modes, including bus services both to Witney and Woodstock; and also to the proposed West Oxfordshire Garden Village, sited north of Eynsham. It makes sense for some development needs to be met at this location, consistent with its size and other environmental and heritage constraints, particularly given that this is likely to mean that pressure on the local and wider highway network is reduced as a result.  
The West Oxfordshire Garden Village is unlikely to deliver an equivalent range of facilities to that available at Hanborough for a considerable period of time. In fact, Stagecoach notes that the proposal is not proposed to begin to deliver new housing until after 2021 at the earliest. A significant range of facilities looks unlikely to be provided there until about 2025. While in due course, it is anticipated to provide a range of local services, the timescale is clearly not in the immediately foreseeable future. At the point they are provided, it is equally unclear how far they will be relevant to any significant wider hinterland, given the spatial distribution of settlements in this part of the District, which will have access to equivalent existing facilities and services either locally or closer nearby.  
Long Hanborough should be retained as Local Service Centre consistent with its current role meeting service needs from a wider hinterland, and public transport in particular. That role is likely to increase, consistent with the objectives set out elsewhere in the emerging Plan at paragraph 9.5.48, which states that "(WODC) anticipate(s) Hanborough Station developing into a highly effective transport hub".  
At a future point when the Plan is reviewed, should services and facilities at least as comprehensive have been provided in the New Garden Village, then it may prove appropriate to add the settlement to the Local Service Centre category, or its equivalent nomenclature. |
| MM451         | English Heritage        | Historic England| Mr                | Small             | 1053       | > SECTION 4 - OVERALL STRATEGY > MAIN 15 | Historic England welcomes and supports Proposed Main Modification MAIN15 for the addition of paragraph 4.18b as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework. |
| MM491         | Crest Strategic Projects| Crest Strategic Projects | - | Crest Strategic Projects | 1263       | > SECTION 4 - OVERALL STRATEGY > MAIN 15 | 2.6 Paragraph 4.15 is consistent with the submission version of the Local Plan with the exception that the phrase 'most future development' becomes 'a significant proportion of future development', when referring to the amount of development that is being directed to the Witney, Carterton and Chipping Norton sub areas. What is retained is the intention within the Local Plan that there should be a particular focus on steering development to the three Main Service Centres of Witney, Carterton and Chipping Norton. The fact that there is no change in this approach is justified by the acknowledgement that the 'Three Town Strategy/Focus' takes into account previous consultation responses and the results of several Sustainability Appraisal reports.  
2.7 Paragraph 4.16 recognises that the three towns offer greatest access to services and facilities, are accessible by a range of transport modes, offer a good range of job opportunities and have suitable and deliverable development sites available to meet the development requirements of the district. As a |
consequence the strategy directs both strategic and non-strategic scale development to the Main Service Centres. This approach is consistent with the evidence base and with the Vision and key strands that inform the policy-making approach of the Local Plan.

2.8 Paragraph 4.17 is amended, compared to the submission version of the Local Plan, only insofar as the justification for directing development to other locations away from the three towns is based on helping to meet the unmet housing needs of Oxford City. There is no suggestion here that the approach to meeting West Oxfordshire’s housing needs requires a different strategy to that contained in the submission Plan, which was informed by several rounds of public consultation and sustainability appraisal. If that strategy required revision in the face of an uplift in the approach to meeting the District’s OAHN the main modifications should articulate the change; they do not.

2.9 Without any prior explanation of why, or indeed justification for the proposed change to the strategy for accommodating the District’s housing needs, the Submission Plan version of paragraph 4.18 is deleted in its entirety. The text stating that the six (secondary tier) rural service centres are suitable for accommodating development of ‘an appropriate scale’ and type to reinforce their role as such is removed. In place Eynsham is singled out as having ‘a particularly important role to play’ in meeting West Oxfordshire’s housing needs, alongside some of the unmet housing needs of Oxford City. This appears incongruous from the perspective of the settlement hierarchy: Eynsham has a population of 5,000 and is a rural service centre, while Carterton is a Main Service Centre with a population of 16,000, yet is allocated no strategic scale development.

2.10 To this end the new paragraph 4.18 introduces the notion of an SDA to the west of Eynsham, something not mentioned or signalled in the preceding pages, or more importantly in the Vision for the District. Considering that this is ‘particularly important’ to the new strategy of the Local Plan, it would be reasonable to assume that the Vision should identify Eynsham itself (not simply the proposed self-contained Garden Village) as a key component in the Council’s housing strategy. However, Eynsham remains classified as a Rural Service Centre, the role of which is to accommodate a scale of development sufficient to meet the needs of the settlement itself and its immediate rural hinterland, not as is indicated at paragraph 4.18, the needs of the whole of the District. This is out of step with the evidence base and with the proposed settlement hierarchy.

2.11 Paragraph 4.18a refers to the proposed Garden Village located to the north of the A40, which the Vision describes as being ‘self-contained’ and which paragraph 4.17 indicates is required to address the District’s share of the unmet housing needs of Oxford City. This will become a ‘new rural service centre’, making clear its independence from Eynsham itself.

2.12 This distinction is important, and is set out within the evidence base at paragraph 1.5 of the Sustainability Appraisal (SA) Addendum Report, which advises that the SA process had adequately addressed, via the February 2015 document and the iterative process leading to it, reasonable alternatives to strategies for meeting housing needs arising only in respect of the District itself. The submission Local Plan chose to do this via the preferred spatial option (considered against all reasonable alternatives), which was Option 2 within the Pre Submission Draft SA Report (February 2015) (ATTACHED).

2.13 The SA takes the approach that the strategic options for meeting housing needs need only be revisited to address land allocations to help meet unmet housing needs from Oxford City. Under this scenario the range of options needs to be extended to include other options (paragraph 1.5).

2.14 The clear implication of this approach is that there is no specific requirement to reinvent the whole...
strategy of the Local Plan if the Council chooses not to do so as the Three Towns focus, with a limited degree of dispersal to help sustain the rural areas (Option 2), is justified and appropriate for meeting the OAHN of West Oxfordshire. It is only because the Local Plan chose not to embrace meeting needs from Oxford City specifically in the submission version that the Inspector considered there to be a need to reconsider additional spatial options to those appraised when selecting the Three Towns focus, if an element of Oxford’s housing needs was subsequently included.

2.15 In response the SA revisited the two spatial options that formed part of the initial SA of options considered for accommodating growth:

* A new village; and
* Concentration of development along transport corridors.

2.16 The SA Addendum recognises that the changes to the Local Plan are concerned principally with accommodating a higher quantum of housing development to ensure that the approach to housing requirements within the Plan has a reasonable chance of being found sound. The 5,450 dwelling uplift proposed via the Main Modifications would accord with the recommendations within the Oxfordshire SHMA for West Oxfordshire (660 dpa/13,200 dwellings) and would incorporate in addition 2,750 dwellings to help meet the unmet housing needs for Oxford City under the duty to cooperate (paragraphs 1.8 and 1.9).

2.17 The SA addendum did not start the whole process afresh, but rather revisited and reconsidered the uplift in housing required to address the two shortcomings identified by the Inspector at the Stage One hearings, namely failure to plan positively to meet the District’s own needs and to plan to help meet the needs of Oxford. Importantly the SA re-assesses the Council’s spatial decision-making within the submission Local Plan and considers an appropriate response to meeting the needs of Oxford. The February 2015 SA was therefore reviewed to include additional alternatives for accommodating the combined (West Oxfordshire and Oxford City unmet need) OAHN. This approach is considered to be sound. However it is the execution of this exercise that is confused and partial and which appears (on the face of it) to be contrived to fit a preferred outcome, rather than itself being the process that leads to recommendation of an outcome (from the perspective of sustainability). Further points are made in this regard in subsequent representations.

2.18 It is reasonable to assume that the provisions of paragraphs 4.18a and b sit within the context of paragraph 4.17, which defines the Local Plan’s strategy:

* Three Towns focus = significant proportion of future development directed to the Main Service Centre Sub Areas with particular focus on Witney, Carterton and Chipping Norton;
* West Oxfordshire Garden Village = to help meet the unmet housing needs of Oxford City; and
* Development dispersed across the district = to help spread the benefits of growth and to sustain the more rural parts of the District.

2.19 This approach is justified by the SA process, but only insofar as it is consistent with the findings of the SA, which considered the spatial options for accommodating growth solely to meet the needs of the District (initially), and subsequently to meet these needs plus some of the unmet housing needs of Oxford City. The refreshed and updated SA provides that the most sustainable spatial approach to accommodating this (combined) scale of development is through a combination of the Three Towns focus, with limited dispersal (original Option 2) and a new village (Option 5).

2.20 In this regard the SA Addendum is clear at Section 3.0: Alternatives Considered & Sustainability.
Appraisal, that five spatial strategy options were considered, with options 1-3 (Witney Focus; Three Towns Focus; Dispersal, with some growth at the three towns) reappraised in the context of the uplift in housing required to respond positively to the West Oxfordshire OAHN, and options 4 and 5 (concentration along transport corridors and a new village) re-introduced to address the Oxford unmet need (paragraph 3.2).

2.21 Section 4.0: SA Findings describes the case for the spatial approach to allocating housing identified by the SA as the most sustainable and therefore that which should underpin the policy approach within the Local Plan. It states in very clear terms at paragraphs 4.11-4.14 why the Three Towns Focus (Option 2) and New Village (Option 5) together represent the right strategy for allocating housing development across the District. Paragraph 4.11 proclaims that the reason for maintaining the Three Towns focus remains as described at Table 4.3 of the February 2015 SA (set out above).

2.22 It is clear that the primary foci for development are the three Main Service Centres, which are the most sustainable locations within the District and which are most able to meet the requirements of residents across the Plan period in a sustainable manner. In essence there is confirmation that the spatial strategy, tried and tested via three iterations of the SA (paragraph 3.3) for meeting West Oxfordshire’s needs, remains fit for purpose and should be carried forward to examination.

2.23 The new village option has been reconsidered, although the reason for selecting this option as a key component of the Local Plan housing strategy is made rather obliquely. Paragraph 4.121 explains why it was not pursued originally, namely because there were concerns about the long-lead times and delivery risks and because development in this location would not meet the needs of the wider District. There is no clear explanation, other than the uplift in housing numbers required, as to why it is once more being considered.

2.24 However it becomes clearer exactly what role the new settlement is playing by referring to the Directions of Growth at Eynsham section of the SA Addendum: Paragraphs 3.11 and 3.12 make clear that Eynsham was not a strategic location for growth considered appropriate to meet the housing needs of West Oxfordshire, but taking into account the required uplift in housing it has been revisited. A key consideration in evaluating options for growth at Eynsham, referred to within the SA, is the report prepared by Land Use Consultants (LUC) – Oxford Spatial Options Assessment Final Report (September 2016). The Executive Summary (p.1) sets out very succinctly what the terms of reference/aims and objectives of this report are (0.2):

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, providing guidance and evidence to inform decisions on how this unmet need can best be distributed across the County.

2.25 What is clear is that the new village option, and further development to the west of Eynsham, were tested only as options to help accommodate the unmet housing needs of Oxford. Three options were considered (North, West and Eynsham Park), of which, the study concluded, only North and West have the potential to help meet some of Oxford’s unmet need. Within the Plan period to 2031 the land to the north has potential to deliver up to 2,200 dwellings, while land to the west a further 550. There was no evaluation of a 1,000 dwelling urban extension to the west.

2.26 Taking this into account the evidence on which the Council is relying to allocate further land at Eynsham is germane only insofar as it considers the sustainability of the location in the context of helping to meet
Oxford’s unmet need for housing – not meeting the wider housing needs of West Oxfordshire, as a location for which it has already been rejected via an earlier iteration of the SA. Therefore while it is appropriate for the Council to cite this report as evidence in support of Eynsham as a suitable location for meeting Oxford’s unmet need, it cannot be extended further, on the basis that it was not considering such.

2.27 To be a reasonable location to meet the housing needs of West Oxfordshire the SA Addendum would have needed to redefine the spatial strategy chosen for this purpose (Option2) and reject the Option 2 conclusions set out at Table 4.3 of the submission SA, which did not include development options at Eynsham on the scale being considered within the modifications. In this regard there is insufficient justification within the evidence base to support the role that Eynsham is now proposed to play in helping to meet, not just the unmet housing needs of Oxford, but also strategic scale housing to meet the wider needs of the District.

2.28 On the same grounds the introduction of Woodstock as a location for growth is not supported by the evidence base. Woodstock is a Rural Service Centre with a population of 3,000 people. The proposed modifications introduce three sites for development that collectively would total 670 new dwellings. Based on average household size derived from 2011 Census data this would suggest a c.45% increase in the size of the population of Woodstock during the Plan period if these sites are developed.

2.29 For the same reasons outlined above the strategy for housing delivery that has been subject to SA and which the Council relies upon spatially did not contemplate this scale of growth at rural service centres as part of the Three Towns focus. Furthermore, Woodstock is considered to be an extremely sensitive location in terms of heritage considerations, being dominated as it is by the presence of the Blenheim Palace and Park World Heritage site (WHS). The settlement also has a large conservation area and a large number of listed buildings of all grades. The setting of the WHS is clearly a highly significant consideration and one that needs to be dealt with very carefully and clearly in the plan-making process. Paragraph 4.18b asserts that the settlement can accommodate a reasonable scale of development, whilst protecting the historic character and setting of Blenheim Palace.

2.30 There are two issues with this proposed modification that arise immediately; in the context of a highly historic rural service centre with a population of c.3,000 people a c.45 % increase in population as a consequence of new residential development is not considered reasonable. More importantly the text asserts boldly that the settlement can accommodate this level of development while preserving its historic character. The evidence base does not support this statement, or indeed provide any reasoned justification for it.

2.31 The submission version of the Local Plan did not contain any allocations at Woodstock and so did not assess impacts on heritage considerations arising from such. The evidence base only considered potential impacts on heritage assets in respect of Woodstock within the February 2015 submission version of the SA (there is no separate district wide assessment of the significance of the historic environment, or indeed an up to date assessment of the historic environment around Woodstock forming part of the evidence base of the Local Plan) when considering the relative merits of the spatial options for distributing development across the district. In assessing Option 3 – Dispersal (an option that was rejected initially and the subsequently when reappraised as part of the SA refresh in the 2016 SA Addendum) SA Objective 14 – Conserve and Enhance Landscape Character and the Historic Environment was classified as ‘Major Negative/Uncertain’. In summarising the likely nature of the SA effects there is no clear demarcation of landscape effects and heritage effects, but it can be assumed that the conclusions in respect of heritage considerations are ‘Uncertain’ insofar as the summary states:
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<td>The nature and significance of the effect on heritage is dependent on the scale and precise location of development as well as the sensitivity of receptors. Dispersing development across the District has the potential to have negative effects on a larger number of heritage assets than the other Options, which includes the Blenheim Palace WHS.</td>
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<td>What is clear from this is that the dispersal option was not considered to be optimal from a heritage perspective. However the uncertainty of effect was based only on a presumption that policy provisions could be included that would mitigate potential harmful effects. This is considered to be overly optimistic and somewhat naïve (although this was not at this stage significant as the dispersal option was rejected) given that there is recognition within the SA that the significance of the effect is determined by the scale and location of development proposed and the sensitivity of receptors. In the case of Woodstock, WHS status renders Blenheim Palace highly sensitive as a receptor in heritage terms and therefore it is reasonable to assume that it should be afforded the highest protection as a designated heritage asset. With regard to the question of scale there is no clarity within the February 2015 SA, and no clarity per se on heritage impacts arising from this option.</td>
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<td>The 2016 SA Addendum is now charged with assessing site specific impacts in this context where proximity to the WHS is known and the scale of development at Woodstock is also defined. The conclusions are considered to be no more robust or convincing than they were in the submission SA. However the gravity is now far greater given that the modifications to the Local Plan propose significant development at Woodstock.</td>
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<td>Paragraph 4.77 of the SA Addendum acknowledges that as a consequence of the three proposed allocations (notably the sites to the north and east) there are potential negative effects on the setting of the WHS and associated cumulative negative effects on landscape and transport. While these are not expanded upon specifically with regard to their associated impacts on the setting of the WHS, or indeed the conservation area and other listed buildings within Woodstock, it would be reasonable to assume that there would be some concomitant adverse effect on heritage.</td>
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<td>To address this the SA Addendum states that while there are likely to be negative effects on heritage (ie. harm), site specific requirements that would be secured through policy measures have the potential to mitigate any impacts, although this is uncertain pending completion of ‘detailed project level studies’.</td>
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<td>This approach to policy making within the setting of a WHS is surprising.</td>
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<td>The SA, which is the only piece of ‘evidence’ that considers the impact on the WHS, acknowledges harm, but asserts that this could be addressed by ‘site specific requirements’ and through policy provisions (EW1/EH7) although the site specific requirements would not be known until ‘detailed project level studies’ have been undertaken. This is a plan-making process and project level studies will not be available – it is reasonable to assume – until the site is allocated, by which time it will be too late to determine, in the context of the allocation, whether any harmful effects arising from allocation could be mitigated successfully. Paragraph 169 of the NPPF directs that when assembling a proportionate evidence base in support of plan-making: Local Planning Authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment.</td>
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<td>2.38</td>
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<td>Paragraph 4.77 of the SA Addendum demonstrates very clearly that this is not the case. In the context of considering impacts on the setting of a WHS arising from draft allocations within an emerging Local Plan this</td>
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2.39 With regard to the assertion that the draft policies EW1 and EH7 will provide sufficient protection to mitigate any harm, these points are addressed in detail under the relevant representations to these policies. However it is pertinent to point out here that the policies contain no specific provisions that would militate against harm with any certainty, they merely require proposals to ensure there will be no harm to heritage assets. This is a circular and meaningless position: There will be no harm to designated heritage assets, because the policy requires there to be none. If there is no evidence compiled that considers the value of the historic environment and the sensitivity of receptors, how can there be any certainty that the provisions of the policy can be met with respect to a specific allocation. The approach is entirely unsound and unjustified.

Paragraph 4.18a: This paragraph claims that the new village will be based on “garden village” principles, but it will find it hard to keep to some of them. The Department for Communities and Local Government’s document of 16 March 2016, “Locally-Led Garden Villages, Towns and Cities”, sets out some specific criteria that Garden Villages must meet:

"They must work as self-sustaining places, not dormitory suburbs." (Commuter belt for Oxford's unmet housing needs?)

It is "important for the new community to establish a clear and distinct sense of identity". (Too close to Eynsham?)

The government is "not looking to support places which merely use 'garden' as a convenient label", but will support the development of "communities that stand out from the ordinary". (The Local Plan uses the right language, but the words often seem rather empty.)

They should not be "an extension of an existing town or village". (Hard to avoid, given the proximity to Eynsham.)

2.1 As set out in the supporting settlement hierarchy to the policy the top tier of settlements is comprised of the three main service centres of Witney, Carterton and Chipping Norton.

2.2 We continue to support the Council’s settlement hierarchy in this respect. The Policy itself advises that:

"A significant proportion of new homes, jobs and supporting services will be focused within and on the edge of the main service centres of Witney, Carterton and Chipping Norton. A number of site allocations are proposed to ensure needs are met. Further allocations may be made through Neighbourhood Plans."

2.3 We support the recognition that Chipping Norton is a suitable location to accommodate additional development. The Council's updated Settlement Sustainability Report (November 2016) which is published in support of the consultation classifies Chipping Norton as the second most sustainable settlement in the District (weighted and unweighted).
2.4 Our comments in relation to Chipping Norton itself are set out with regards to the section of the Plan dealing with the Chipping Norton Sub-Area itself and as such are not repeated here.

The proposal to remove Long Hanborough from the Rural Service Centres and designate it as a village is unsound for the following reasons:

1. Its long history as a Service Centre

Long Hanborough has been designated as a Service Centre for a long time. It is designated as a Service Centre in the West Oxfordshire Local Plan 2001 - 2011 (Figure 5.2) and was proposed to be designated as a Rural Service Centre in the submission West Oxfordshire Local Plan 2031 (Table 4.1). The National Planning Policy Framework (NPPF) requires that 'the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.' (para 182) and the Council has long accepted that there is sufficient evidence to justify the designation of Long Hanborough as a Rural Service Centre.

2. Wide range of services and facilities

There is ample evidence that Long Hanborough has a wide range of services and facilities and therefore merits its Rural Service Centre status. These include a new spacious doctors’ surgery for which planning permission was obtained in July 2016 and which will be provided as part of the residential development on the land south of Witney Road granted planning permission under appeal ref: APP/D3125/W/15/3129767. The new doctors’ surgery is required to be provided under conditions 15 & 16 of the permission within 2 years of commencement of the development and to remain in that specified use. This will replace the current cramped doctors’ surgery, which is well below NHS England standards of provision for the population it serves, and not only improve facilities for existing residents, but also provide the capacity for the provision of more homes in Long Hanborough. Other services and facilities include a primary school; petrol station; churches; post office; two Co-op food stores; dental practice; playing fields; spacious village hall; nursery; beauty salon; two public houses; fish and chip shop; substantial employment estate (circa 10.72 hectares) and a mainline train station (the Cotswold Line).

3. Close relationship to the Oxford and Oxfordshire City Deal and the ‘Knowledge Spine’

A key part of the case for Long Hanborough to remain as a Rural Service Centre is its close relationship to the City Deal. The Oxford and Oxfordshire City Deal is part of the Government’s initiative to devolve powers locally in exchange for local authorities taking on responsibility for creating economic growth in their areas. The Oxford and Oxfordshire City Deal aims to promote growth by maximising the existing educational, pharmaceutical and science assets in order to promote Oxford and Oxfordshire’s status as a prosperous economic area.

The City Deal, is a cooperative venture, which will be delivered through the Oxford Local Enterprise Partnership (LEP) bringing together other bodies and institutions, including Oxford City Council, Cherwell District Council, South Oxfordshire District Council, Vale of the White Horse District Council, West Oxfordshire District Council, Oxfordshire County Council, Oxford Brookes University and Oxford University. The area of the City Deal is County wide.

The proposed development at Long Hanborough is very close to the ‘Knowledge Spine’ identified in the City Deal, which stretches from Science Vale, near Didcot to Bicester, with Oxford at its heart. Paragraph 9.5.11 of
the Local Plan acknowledges this, stating that the proximity of the Eynsham-Woodstock sub-area to major employment growth areas 'present a diverse range of opportunities within close distance including within the Oxfordshire knowledge spine suggesting the Eynsham Woodstock area has a positive role to play in terms of economic development.' Two key proposed employment sites that are close to Long Hanborough, and which housing there would help to serve, are the Science Park at Begbroke, which Cherwell District Council has identified in its Local Plan 2011 - 2031 (adopted July 2015) policy Kidlington 1 for Accommodating High Value Employment Needs and the Northern Gateway, which adjoins the A44 at the northern edge of Oxford, which Oxford City Council has allocated in its Northern Gateway Area Action Plan (adopted July 2015) policy NG2 for up to 90,000 m² of employment uses that directly relate to the knowledge economy and include science and technology; research; bio-technology; and spin off companies from the universities and hospitals.

The City Deal commits the participating local authorities to accelerate the delivery of 7,500 homes across the county; and recognizes that the provision of quality housing close to the employment areas is fundamental to the delivery of innovation led growth.

The importance of housing provision to the achievement of the objectives of the City Deal is emphasized in the section on 'Planning for Development,' that states: 'The City Deal should enable further economic growth. However, this success has placed pressure on the local housing market. Oxford and Oxfordshire have overwhelming evidence that the lack of choice and availability of housing and affordable housing is a major barrier to growth. Oxford and other areas in the county are identified as among the least affordable locations in the country, and significantly ahead of London. The universities and businesses in the knowledge economy identify that housing is a significant barrier to the recruitment and retention of staff, including senior management and researchers. More housing is essential for the future of the knowledge economy in Oxford and Oxfordshire. City Deal partners recognise that a more strategic and ambitious approach towards housing growth is essential to the future of the knowledge economy in Oxford and Oxfordshire, and will ensure that the area continues to be a dynamic place to invest and work.

The proximity of Long Hanborough to the 'Growth Spine,' and its ability to contribute to the City Deal further emphasizes the importance of it continuing to be designated as a Rural Service Centre.

4. Recent Rail Improvements & Further Improvements Detailed in the Main Modifications will enhance Long Hanborough's role as a Rural Service Centre

There is therefore absolutely no evidence to demonstrate that it should be downgraded to village status. In fact, the service centre role performed by Long Hanborough has improved in recent years due to the improvements that have taken place in the rail service with further improvements proposed.

The presence of the train station at Long Hanborough is virtually unique in West Oxfordshire. None of the three main settlements of Witney; Carterton and Chipping Norton has a train station and the only other service centre which has one is Charlbury, which is located within the Cotswolds Area of Outstanding Natural Beauty (AONB) where development is therefore constrained in accordance with the advice in the National Planning Policy Framework (paragraphs 115 - 116). At Long Hanborough there is a regular direct train service to Oxford, Didcot, Reading, Slough, London and Worcester, with the journey to Oxford only taking ten minutes. This is of particular significance, as paragraph 9.5.34 of the Submission Local plan acknowledges that the Eynsham/Woodstock sub area, within which Long Hanborough is located, has 'very strong linkages with Oxford, with a high proportion of residents working in the city and much of the economic activity forming part of the wider Oxford city region economy.'
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<td>The proposed main modification 66 reinforces the importance of the Hanborough train station with paragraph 7.57(a) stating that: ‘passenger growth on the Cotswold line has been significant with exceptional growth at Hanborough (up 239%).’ It states that ‘there is the potential for further growth with the introduction of an hourly service in December 2018. New trains will bring increased capacity with additional seating and will also achieve faster journey times, with some services from Hanborough reaching London Paddington in 63 minutes.’</td>
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<td>There are also proposals for further improvements with paragraph 7.57(b) stating that: ‘LTIP4 identifies a strategic aspiration to develop Hanborough Station as a transport hub to help reduce congestion on the A40 as part of an overall package of public transport measures. To fulfil its potential, the station will require a larger car park, footbridge and new platform so any trains extended from Oxford can terminate and turnaround. To fully realise the potential of the railway, further redoubling will be required at the eastern and western ends of the line, between Wolvercote Junction and Hanborough, and from west of Evesham towards Pershore. This would allow up to three trains per hour to Hanborough and/or Char/Bury and two trains per hour between London and Worcester, with a journey time under two hours.’</td>
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<td>These points are also reiterated in paragraph 9.5.16 which refers to Hanborough station as being ‘one of the District’s largest and most well-used stations. Car parking facilities have recently been expanded at Hanborough to improve capacity and there are aspirations for further station improvements,’ and then goes on to repeat the improvements outlined in paragraph 7.57 above.</td>
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<td>Paragraph 9.5.34 also states that: ‘there is potential to develop Hanborough Station as a stronger transport interchange, with additional parking, and improved access from the south.’</td>
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<td>These improvements will further improve the sustainability of Long Hanborough and mean that it is far more accessible by public transport, particularly to Oxford, than any other service centre in West Oxfordshire, apart from Char/Bury, which is in the AONB. This constant reiteration in the Main Modifications of the importance of Hanborough station and the further improvements planned for it, prove that Long Hanborough certainly merits its designation as a Rural Service Centre.</td>
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<td>The proposed Main Modifications, however, go on to state in paragraph 7.57c that: ‘In light of the proposed improvements to Hanborough Station a key element of the proposed garden village to the north of Eynsham will be the provision of improved connectivity between the new settlement and the station particularly by bus and cycle.’</td>
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<td>Given, that Long Hanborough is located adjoining the station there is already excellent connectivity with the train station, with a pedestrian and cycle path through the settlement providing access to it. It is also located closer to the station than the proposed garden village. With the recent and proposed improvements to the station it therefore clearly performs the role of an important transport hub and should retain its status as a Rural Service Centre.</td>
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<td>5. Scoring in the West Oxfordshire Local Development Framework Settlement Sustainability Report (November 2016)</td>
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<td>The Council has prepared a Settlement Sustainability Report (November 2016), which gives weighted and unweighted scores. In both Hanborough scores above all of the villages, scoring the same as the Rural Service</td>
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Centre of Bampton and 2 points more than Bampton in the Weighted Score. However, Long Hanborough’s position as a Rural Service Centre is even more significant than this indicates as there are three different positive indicators for a bus service which are:

- Daytime bus service;
- Evening bus service;
- Bus service every 30 minutes

However, for the train there is only one score for a railway station in the parish. At Hanborough Station there is an evening train service, with the last train arriving at 23.02. The train also only takes 10 minutes from Oxford station, giving Hanborough a high level of accessibility, so the rail service clearly merits a higher score than the unweighted score of 1 or the weighted score of 2.

With regard to the weighted score, there is a strong argument that having a railway station in the parish should result in a weighted score of 4 being given, as is the case where a Post Office; Shops; Primary School; Doctors’ Surgery and Local Employment Opportunities are present.

6. The Planning Inspector Philip Asquith who considered the appeal into the proposed residential development and doctors’ surgery on land south of Witney Road, Long Hanborough considered that Long Hanborough merited designation as a Rural Service Centre

The Inspector who determined the planning appeal relating to land south of Witney Road, Long Hanborough, (APP/D3125/W/15/3129767 & 12/1234/P/OP) also considered Long Hanborough to merit the designation as a Rural Service Centre, stating that:

49. ‘Long Hanborough is one of the nine larger settlements in the district classified in the WOLP as Service Centres. These, by definition, have a good range of facilities, services and transport accessibility to support their immediate communities as well as neighbouring hinterlands. This is confirmed by the Council’s Settlement Sustainability Report, revised in December 2013. The village is also defined as one of six Rural Service Centres within the emerging Local Plan 2031. The Statement of Common Ground between the appellant and the Council notes that Long Hanborough is a suitable location to accommodate significant residential growth. There is a range of local services, including a small business park adjacent to the station, which allows a proportion of travel demand (alternative to the car) to be met locally.’

50. The village is only one of two settlements within the category of Main Towns and Rural Service Centres in the district to have a mainline station. The rail line provides direct services to London, Oxford, and Worcester....... It is apparent that there is a commitment to the introduction of new trains with greater capacity, with a longer-term commitment to increase the number of trains from Long Hanborough to Oxford, cut journey times to London and undertake enhancements to the station’s facilities.’

Counter Arguments

There is therefore abundant evidence that Long Hanborough merits its Rural Service Centre designation.

There are two arguments against its designation which are the Council’s statement in paragraph 9.5.3a that:
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'Given the residential schemes of 169 homes and 50 homes recently approved, the limited role of the settlement and its landscape setting, it is only suitable for very modest levels of further development.'

The other being the argument made in the officers’ report to Council on the 26 October 2016, paragraph 5.9, that the proposed designation of the West Oxfordshire Garden Village would mean that there would be too many Rural Service Centres in this part of Oxfordshire.

Neither of these arguments is considered to be a valid reason to remove Long Hanborough’s status as a Rural Service Centre. In the first place the Council is itself proposing in the main modifications to designate two additional sites at Long Hanborough for residential development, these being land at Myrtle Farm, Long Hanborough for 50 homes under policy EW1 f and the other being land at Oliver’s Garage, Long Hanborough for 25 dwellings under Policy EW1 g. There is also land north of Witney Road, Long Hanborough, which is on the opposite side of the road to the 169 dwellings granted approval on appeal, which could be allocated for residential development without a significant impact on its setting, as the issues are very similar to those relating to the land south of Witney Road. (Further consideration is given to this issue in the representations submitted in relation to Main Modifications 27; 160; 170; 171; 172, 173, 174 & 175 seeking the designation of this site.) It is therefore not considered to be true that Long Hanborough ‘is only suitable for very modest levels of further development.’

With regard to the argument with regard to the proximity of the West Oxfordshire Garden Village, this argument is made in the officers’ report to Council on the 26 October 2016 which stated in paragraph 5.9 that:

It is recommended that the proposed Garden Village should be identified as a future rural service centre. The Garden Village would then replace Long Hanborough which would no longer be a defined rural service centre. This reflects the significant scale of development proposed in the Garden Village, the key role it will play as a transport and business hub, and the relatively limited scope for further development in Long Hanborough. It also avoids an over concentration of rural service centres in this part of the District.

However, there are two reasons why it should not replace Long Hanborough as a Rural Service Centre. One is that the proposed Garden Village site currently consists of fields, with no services and facilities and is therefore not a Rural Service Centre. Indeed, given the significant planning issues; funding and infrastructure that is required for a new settlement, the West Oxfordshire Garden Village may never come to fruition or may develop much more slowly than currently envisaged and so not perform a Rural Service Centre function during the entire plan period. Even on the most optimistic trajectory it is clear that it will not perform the role of a Rural Service Centre for many years.

Secondly it will effectively form an extension to Eynsham. Indeed, paragraph 9.5.40r of Main Modification 153 states that:

‘By ensuring good links across the A40 (e.g. an iconic feature bridge as suggested in the Council’s Garden Village expression of interest) existing residents of Eynsham to the south will be able to access the Garden Village to enjoy the services, facilities and amenities it will offer. Conversely, residents of the Garden Village will be able to access Eynsham and its services and facilities, thereby playing a complementary rather than a competing role.’

It will therefore effectively form an extension to Eynsham, in the same way that other settlement extensions such as the Littlemore Science Park and Blackbird Leys or Barton form part of Oxford, notwithstanding their
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| MM724         | Gallagher Estates Limited | Gallagher Estates Limited | - | 1705 > SECTION 4 - OVERALL STRATEGY > MAIN 15 | separation from other parts of the city by the A4142 and the A40 respectively.

Indeed, by designating it as a separate Service Centre means that there would be two contiguous Service Centres. It makes much more sense to have Eynsham and the proposed Garden Village as one Rural Service Centre and Long Hanborough as another, as Long Hanborough serves a different area of the District to Eynsham.

Conclusion

For the reasons set out above it is considered that Long Hanborough is a highly sustainable location for development and therefore the designation of Long Hanborough as a Rural Service Centre, as proposed by the Council in the original submission West Oxfordshire Local Plan 2031 ‘is the most appropriate strategy when considered against the reasonable alternatives’, (NPPF, para 182) based on the Council’s own evidence base and that it would be wrong for it to be downgraded to a village.

Main 15 - 16 - Policy OS2 – Locating Development in the Right Places & Supporting Text

2.1 As set out in the supporting settlement hierarchy to the policy, after the three main service centres of Witney, Carterton and Chipping Norton, the next tier of settlements is the rural service centres comprised of:

- Bampton
- Burford
- Charlbury
- Eynsham
- West Oxfordshire Garden Village (at North Eynsham)
- Woodstock.

2.2 We continue to support the Council’s settlement hierarchy in this respect. The Policy itself advises that:

“The rural service centres of Bampton, Burford and Charlbury are relatively constrained and are intended to accommodate a modest level of development of an appropriate type that will help to reinforce their existing service centre role. A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans.”

2.3 We support the recognition that Bampton is a suitable location to accommodate additional development and that this is important to reinforce its existing service centre role. The Council’s updated Settlement Sustainability Report (November 2016) which is published in support of the consultation classifies Bampton as being within the top eight most sustainable settlements in the District (unweighted).

2.4 Proposed paragraph 4.18c of the supporting text states that:

“The focus on development at the existing rural service centres of Bampton, Burford and Charlbury will be more limited. These service centres contain a good range of services and facilities but are constrained in terms of their capacity to accommodate further development. Bampton already has a large housing scheme of 160 homes under construction and site allocations are proposed in Burford and Charlbury to ensure the...
delivery of new housing on suitable available sites, including the delivery of much needed affordable housing."

2.5 Bampton falls within the Carterton Sub-Area of the Plan. Our comments in relation to the suitability of Bampton to accommodate additional development and the suitability of our client’s site at land at Aston Road/Mount Owen Road are discussed in relation to the proposed modifications to the Carterton Sub-Area below, and as such are not repeated here.

2.6 In summary the Council’s recognition of the sustainability of Bampton is supported, however it is considered that the settlement is capable of accommodating additional development to help meet the Council’s objectively assessed need and that our client’s site at Aston Road/Mount Owen Road, Bampton should be allocated for 160 dwellings to help meet this requirement. The Council have provided no evidence to support their assertion that Bampton is constrained in terms of its capacity to accommodate additional development. Indeed the consultation responses received in respect of our client’s application for the proposed development of land at Aston Road/Mount Owen Road, Bampton confirm that there are no capacity issues that cannot be adequately mitigated by Section 106 contributions.

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<td>Cala Homes</td>
<td>1737</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td>Paragraph 4.15 - 4.19 CALA supports the continued focus for the significant proportion of future development to the Main Service Centres, including at Long Hanborough. This retains the approach endorsed by the Council’s evidence underpinning the Submission Draft Plan and is in line with the requirements for sustainable development set out in the National Planning Policy Framework (NPPF).</td>
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<td>MM739</td>
<td>The Church Commissioners for England</td>
<td>Miss Kateley</td>
<td>-</td>
<td>Kateley</td>
<td>1758</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td>Introduction We write on behalf of our client the Church Commissioners for England (the Commissioners) which manages a well-diversified investment portfolio to support the Church’s work across the country and is a long-term landowner in the West Oxfordshire area. We understand that the Council are currently consulting on the proposed modification to the Submission Draft West Oxfordshire Local Plan Local Plan 2031 Consultation. The Submission Draft West Oxfordshire Local Plan Local Plan 2031 seeks to address the initial concerns raised by the inspector in December 2015 following the first Local Plan hearing which dealt with strategic matters. These concerns generally related to the overall housing requirement and deliverability of these sites. We recognise that in response West Oxfordshire has increased the total housing requirement to 15,950 homes, allocated new sites and increased the size of strategic sites. We submitted representations in relation to the following five sites located within West Oxfordshire on behalf of the Commissioners to the West Oxfordshire Call for Sites in February 2016: · Land North of Bampton · Deanery Farm · Church Close</td>
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<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td>As one of the rural service centres, we agree that there is need for development in Burford and that the town should make a substantial contribution to the identified housing need for the Burford-Charlbury sub-area of at least 1,000 homes (MAIN 24). Again, this should be seen as a minimum number and not an overall cap/target to be met. Burford is in the saved adopted Local Plan a key location for development and has been proposed as such in the WOLP. This is supported by the West Oxfordshire Settlement Sustainability Report which is part of the evidence base for the Local Plan. The Sustainability Report both in its original guise and as updated in November 2016 identifies Burford as one of the most sustainable locations to accommodate growth in the</td>
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- Land at Lower Farm Cottages
- Ansells Farmyard

All five sites are immediately available and are suitable for allocation. We understand these have not been included within the Submission Draft West Oxfordshire Local Plan Local Plan 2031 and instead there is a focus on larger allocations.

Housing

The Commissioners generally support MAIN 16 Policy OS2 which states, in relation to Bampton, that "further allocations may be made through Neighbourhood Plans" however it also recognises that a number of site allocations are proposed to ensure identified needs are met. It is unfortunate that as per MAIN 15 PARA 4.18c we understand that specifically for Bampton, this relies on one major site for 160 homes. Smaller sites should also be included.

Planning Practice Guidance (PPG) states that when undertaking a Housing and Economic Land Availability Assessment all types of sites should be considered, including vacant and derelict land and buildings (including disused agricultural buildings). Whilst the NPPF states that the supply of new homes can sometimes be best achieved through planning for larger scale development it also states that sites must be deliverable. Larger sites require significant investment in infrastructure and take longer to develop.

Smaller sites on the other hand offer a number of benefits. Typically smaller sites require less infrastructure investment and can be quicker to develop and deliver whilst still providing a valuable contribution to the Council’s 5 year land supply and housing targets.

The development of a mix of smaller sites and larger sites can also enable a mix of housing to be delivered in accordance with paragraph 50 of the NPPF which states that local planning authorities should plan for a mix of housing based on current and future trends. The development of smaller sites can offer a range of housing sizes, type’s tenure and range of housing in accordance with the local demand for current and future demographic trends. New developments on smaller sites can also be designed to be more in keeping with the character of the local area.

There are often fewer barriers to the delivery of housing on smaller sites where the requirement for remediation works and new infrastructure is often less than that of larger sites. The level of disruption is also in turn lower which can result in less opposition to new development. This combined with quicker building times allows a quicker turn around for delivery. The development of smaller sites will also help small and medium sized builders which will help with the Governments initiative to assist small and medium sized builders.
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| District. Indeed, even among the Rural Service Centres, Burford enjoys particular sustainability credential with a secondary school located in the town and as a result of the towns employment and retail base. In general level the emerging Local Plan considers the service centres to be entirely suitable for development because of their range of services and facilities. Growth of an appropriate scale is perceived as adding to the prosperity of the towns in the rural areas around them. Specifically, therefore, BC1 of the WOLP2013 indicates that within the sub-area, "the focus of new development will be Burford and Charlbury" i.e the two towns. The positive strategy for accommodating development at Burford set out in the emerging WOLP 2031 to date was also explicitly linked to the Town Council's aspiration "to see an increase in the housing stock to provide some affordable housing to enable younger families to live in the town, secure the future of the primary school and increase the supply of key workers" (para 9.6.26). New housing in Burford is therefore an important planning objective to be realised through the Local Plan. Main modifications 15 and 16 appear to suggest some downplaying of the role of the town by suggesting that the focus of development at Burford will be more limited (para 4.18c) and that development should be modest (Policy OS2). This is inconsistent with the sustainability of town and with the wider strategy for the Burford-Charlbury Sub-area - where the number of dwellings to be accommodated has quite correctly increased - to 1000 new dwellings (at least). The support of the Town Council for proposals, other than that allocated in the Local Plan to the east of Burford (and notwithstanding the broad objections to that site), indicates that there are other opportunities in the town that will bring local benefits as well as meet wider needs. In particular Hallam supports the allocation of SHELA site 146 in the SHELA (land to the west of Shilton Road) provides opportunities for sustainable development. Reference therefore to the focus of development at Burford being more limited should therefore be removed from the suggested para 4.16c in MM15. Moreover the wording of the policy in OS2 as proposed to be modified should revert to that in the previous version of the plan insofar as it addresses Burford i.e. the rural service centre of Burford (with such others as may be appropriate) should be "considered to be suitable for development of an appropriate scale and type that would reinforce their service centre role". MM16 also refers to the allocation of sites within the rural service centres. Notwithstanding Hallam's objections to the sites identified it is important that the Plan adopts a positive approach and continues to set out the need for additional sustainable sites to come forward "within or on the edge of these service centres" - as had previously been explicitly set out in OS2 before it was proposed to be modified. Explicit reference should be added to the MM15 such that it is clear that ongoing opportunities on the edges of such settlements should continue to be supported as being necessary to deliver the overall housing strategy and the other objectives of the Plan. MM15 should be modified accordingly. In the absence of such amendments this section of the plan is not positively prepared in promoting opportunities for sustainable development nor justified in terms of the evidence base. Eynsham Garden Village We do not believe that the Garden Village proposal at Eynsham is an appropriate measure for delivering the
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| MM746         | Hallam Land Management  | Hallam Land Management | 1835       | > SECTON 4 - OVERALL STRATEGY > MAIN 15 | The proposed modifications to Table 4.1 are insufficient to ensure the delivery of the substantially increased housing requirement in the period to 2031, and are inconsistent with Main Modification 15 that changes the distribution strategy from a focus of 'most' development at the Witney, Carterton and Chipping Norton Sub-area to a 'significant' proportion.  

In Part 1 of his Preliminary Findings (IN 015), the Inspector acknowledged that the development strategy of the plan may not be appropriate to accommodate any significant needs arising from Oxford, and that additional greenfield sites would need to be found (para. 7.7). The Council’s response is to include in the strategy a new Garden Village in the south-east of the district, which was already targeted for a disproportionate share of the growth requirements. For reasons that are set out in the representations below, the substantially increased housing requirement to accommodate both the District’s own needs and those of the neighbouring city of Oxford necessitates a broader distribution, including to the northern sub-area of Chipping Norton to ensure that the requirement is deliverable. It also necessitates allocation of smaller, immediately deliverable sites to alleviate the shortfall in the five-year housing land supply, including the backlog of under-provision.  

To ensure the delivery of the overall housing requirement during the plan period therefore necessitates a greater distribution across the district, with an increased focus on smaller sites associated with the Rural Service Centres and Villages. This is reflected in the proposed development of a new Rural Service Centre, comprising the West Oxfordshire Garden Village. However, the development of a completely new settlement is accompanied by associated risks of delivery delays/failure, there being, as yet, no certainty of Government funding for the proposed new village.  

The revised strategy should therefore also provide for a greater distribution of growth to existing villages, including the identification of additional Rural Service Centres, particularly in the north of the district to provide for a more even distribution of growth, and to alleviate the over-concentration on the south-east of the district with its inherent risks of delivery failures through market saturation. This would be entirely consistent with the development strategy of the Plan which is that:  

Not all growth can or indeed should go to Witney, Carterton and Chipping Norton however and there is a need for development elsewhere to help meet the unmet housing needs of Oxford City, to spread the potential benefits of growth and to help sustain the more rural parts of the district. (para. 4.15)  

A prime settlement for upgrading to a Rural Service Centre is Middle Barton, which is the principal settlement in the north-east of the district, as is evident from Figure 4.1. The Chipping Norton Sub-Area does not currently contain a Rural Service Centre and is the only sub-area in the district in which one is not identified.  

Given the status of Middle Barton as the principal settlement in the comparatively rural north eastern part of the district, it has an important role to play as a service centre for the surrounding rural hinterland. The Sustainability Matrix 2016 contained in the Settlement Sustainability Report (November 2016) confirms that Middle Barton is one of the larger villages with a population in excess of 1,000, and has a good range of social and community facilities, including: -
It is also germane that Middle Barton is within a 5 kilometre cycling distance of key employment facilities, notably the Lotus F1 facility to the south west and Enstone Airfield to the west, which support a number of businesses. In the opposite direction, it is approximately 5 kilometres from Heyford Railway Station, which is accessible by bus. Middle Barton is therefore well positioned to provide opportunities for sustainable travel for those who work in the local rural business hubs, and for those who need to travel further afield by train.

The evidence demonstrates that it is the most sustainable settlement in the Chipping Norton Sub-Area to perform the role of a Rural Service Centre to serve the north-east of the Plan area. Whilst it does not currently have some of the facilities of the existing service centres, there are no existing settlements of such scale in the north-east of the Plan area, aside from Chipping Norton in the north-west part of the sub-area. It is therefore appropriate to focus growth on settlements that have the potential for growth that will contribute to sustaining and improving existing facilities and have potential to attract more. It is noted that the emerging Plan does not set out a minimum level of facilities that are necessary in order for a settlement to be designated as a Rural Service Centre. It is therefore entirely appropriate for the Plan strategy to designate such a centre based on its intended role rather than simply having regard to its existing scale and level of facilities.

Middle Barton has the potential to accommodate a modest scale of growth, the rate of which is unlikely to be restrained by local market saturation given its detachment from the major growth areas to the south. It therefore offers much greater certainty of delivery, beneficial choice of housing location, and can contribute to delivering housing, including affordable housing, quickly and therefore contributing to alleviating the shortfall in the five year housing land supply.

An allocation of housing would also assist in bolstering existing services within Middle Barton. This is supported by the PPG in which it is held to be: ...

Important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. ...

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to enable viable use of these local facilities. (PPG, Paragraph: 001 Reference ID: 50-001-20160519, emphasis added).
"Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of ‘unmet’ housing need that Oxford City are unable to provide for within their own administrative boundary."

We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification.

We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1, 2, 13, 14, 15, 17, 23, 24, 27.

MAIN 15 Paras 4.15 - 4.19 notes that the strategic urban extension to the west of Eynsham will include a new link road that will connect the A40 to the south of Eynsham. We strongly support this proposed link road and consider that it will be important in ensuring a comprehensive approach to development of this area. We consider that the link road should connect to the proposed junction of the A40 that will be created by the proposed Park & Ride facility. The link road would then pass through the site, we would suggest that this link could be secured through a legal agreement for an approval of this site to provide a connection through the south.

We appreciate that the alignment of the SDA link road shown in proposed Figure 9.15b is indicative, however, the highway geometry for an acute approach to the A40, as indicated, some distance to the west of Eynsham, will be difficult to achieve in practice and sensibly the SDA spine road should link directly to the proposed Park & Ride junction, to minimise new junctions on the A40 primary route and to focus and manage movement in the area of the Park & Ride site.

There will be a number of existing and new residents of Eynsham who will drive to the Park & Ride to catch the bus service to Oxford, but it is expected that there will be a significant number of pedestrians and cyclists who will also access the Park & Ride site. Direct and safe movement will be important. The new junction will also give the opportunity to re-plan and improve bus services to Eynsham village using the new SDA link road. Oxfordshire County Council’s Park & Ride consultation runs to the 12th January 2017 and we making representation to OCC to future proof the design of the A40 junction accordingly.

Having provided the most appropriate connection to the A40, as described above, the West Eynsham SDA link road would be able to perform the highways and transport function described in the draft Policy text. It is unlikely in our view that the link road would be designed as a ‘by-pass’; it would most likely serve as a residential distributor road to the development, for efficiency of infrastructure and to provide frontage activity and over-looking for pedestrians and cyclists.

The spine road will provide the most appropriate and direct route to the A40/Park & Ride site and for connectivity to the proposed Garden Village to the north. Clear, safe crossings of the A40 will be required, sensibly focussed on the new A40 Park & Ride junction. It is likely that ace will have to consider access to the proposed Garden Village in parallel with the design and development of the Park & Ride site.

Early resolution of the detailed layout of the A40 access will facilitate the comprehensive development of the West Eynsham SDA. Given the need for OCC to meet their funding ‘window’ for the Parle & Ride scheme, it is important that the SDA A40 access is resolved as soon as possible. It is our Intention to work closely with OCC in the planning and design of the A40 junction, following the expected Committee approval to proceed with
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| MM756 | Cantay Estates | Cantay Estates | - | Cantay Estates | 1913 | > SECTION 4 - OVERALL STRATEGY > MAIN 15 | Proposed modification - Downgrading of Long Hanborough: The proposed modifications involve the downgrading of Long Hanborough from a service centre, to a lower order village. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN13, MAIN14, MAIN15, MAIN59, MAIN66, MAIN145, MAIN149.

Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.

We object to proposed modifications which suggests the downgrading of Long Hanborough from a rural service centre to a village. The submission plan confirmed the rural service centres were classified as such because they benefitted from a range of services and facilities which supported the village and surrounding area. They are able to support additional homes in the short-term, while proposed growth can enhance the role of the settlement in supporting the surrounding rural area (paragraph 4.18). This approach was directly in line with the plan's objective 1 ‘strong market towns and villages' and objective 4 ‘sustainable communities with access to services and facilities', both of which remain un-modified.

Long Hanborough retains the same services and facilities which existed at the time the plan was submitted, furthermore planning permission has been granted which allows significant expansion of the primary school (15/03341/FUL). While additional housing has been permitted no evidence has been produced to suggest additional homes would result in any harm to the character or sustainability of the settlement. The village therefore remains well placed to fulfil the role of a rural service centre.

The downgrading of Long Hanborough proposed through modifications is largely unexplained and not supported by any evidence. The Council cite the creation of a ‘new' service centre through the northern expansion of Eynsham as justifying the downgrading of Long Hanborough as the new development will need to “develop a critical mass of services and facilities” (paragraph 2.5a).

We are concerned the Council's explanation suggests an intention to restrict the development of Long Hanborough and reduce services in the village in order to encourage their replacement in the new development. A restrictive approach to development stifling an existing sustainable settlement and vibrant community is clearly at odds with the Plan's vision, policies of the NPPF and good planning practice.

The provision of an additional service centre would be entirely in line with the Plan objectives. If the development proposed north of Eynsham is to proceed it is clearly preferable that Long Hanborough maintains its status as a service centre complementing any new facilities created. The need to retain the service centre is particularly pronounced due to the unclear deliverability of the proposed site north of Eynsham, even if the site is delivered this will not be until the latter part of the plan period, therefore there is a need for services and facilities in the interim.

The submitted plan set out clear objectives which the following policies sought to deliver sustainable communities. The Council seeks to deviate from this approach without explanation, evidence or proper assessment, we therefore believe this modification should be deleted. |
<p>| MM756 | Cantay Estates | Cantay Estates | - | Cantay Estates | 1932 | &gt; SECTION 4 - OVERALL STRATEGY &gt; | Proposed modification - Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City's unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in |</p>
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<td>MAIN 15</td>
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<td>response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.</td>
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<td>The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making.</td>
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<td>The proposed ‘Garden Village’ is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification.</td>
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<td>The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process.</td>
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<td>A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.</td>
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<td>Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.</td>
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<td>Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.</td>
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<td>MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.</td>
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|               |                        |                |                  |            |                   | MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a
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<td>deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.</td>
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<td>MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document.</td>
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<td>The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.</td>
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<td>The published housing supply position paper sets out the Council's assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.</td>
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<td>The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.</td>
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<td>While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.</td>
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<td>MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.</td>
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<td>We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.</td>
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<td>We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.</td>
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<td>MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the</td>
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published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.

MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.

The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.

MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds
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| MM761         |                         | R Jonas         | Mr               | Jonas      | 1970               | with the NPPFs encouragement of environmentally sustainable development.  

The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use all together. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.

Main Modification 15 proposes that, in addition to development in the four Strategic Development Areas (SDA) identified in the submission version of the Local Plan, a number of smaller, ‘non-strategic’ allocations should be brought forward to meet the objectively assessed need for housing in West Oxfordshire District. In the Eynsham/ Woodstock sub-area, which covers the Land East of Main Road, Stanton Harcourt, six nonstrategic sites are allocated for development adjacent to Woodstock, Long Hanborough and Stanton Harcourt.

In addition, a new rural service centre is proposed to the north of Eynsham to assist in meeting Oxford City’s unmet housing need.

As set out below, we support the District Council’s decision to seek to fully address the Objectively Assessed Need for housing in West Oxfordshire District. Similarly, we support the decision to assist Oxford City Council in meeting some of its unmet housing need.

The overall housing target is challenging, with the timing of delivery of new housing and supporting infrastructure a key consideration.

We are concerned that the Submission Draft Local Plan (including Proposed Main Modifications) places too much reliance on the four SDA’s and a small ‘basket’ of non-strategic allocations. It is clear that in a number of instances there are significant landowner and infrastructure delivery issues to address, which could...
significantly delay the delivery of new dwellings.

We believe that the Local Plan should allocate additional sites to increase flexibility and provide greater certainty over delivery of the District’s housing requirement.

There is more capacity to deliver sustainable development adjacent to the villages in West Oxfordshire - and we set out below the further changes required to the Local Plan to facilitate such development, and specifically, the merits of development on Land to the East of Main Road, Stanton Harcourt.

Whilst the University & Colleges do not wish to comment generally on site specific matters, it is essential that the housing provision identified in the Local Plan to meet the needs of Oxford should be located so as to be easily accessible by sustainable transport from the City. The economic success of Oxford, and the preference for employees to find a home close to their place of work, are key factors in generating the level of housing need that Oxford experiences. It is likely therefore that the greater proportion of residents living in the Oxford related component of the housing that the Local Plan identifies, such as the Eynsham Garden Village, will have their place of work in Oxford.

The 2011 Census illustrates the scale of in-commuting to Oxford from the adjoining authorities and elsewhere. Some 114,000 jobs are located within the administrative area of Oxford – representing approximately one third of the total jobs in the Oxfordshire economy. Some 46% of those working in Oxford, some 45,950 people, commute into the city everyday from elsewhere. In West Oxfordshire this relationship is apparent in the high proportion of travel to work journeys from Witney along the A40 corridor. When undertaken using single occupancy vehicles, this level of commuting causes traffic congestion on the key routes into Oxford harming the local economy through delayed and unreliable journey times and increased transport emissions of air pollutants and carbon. Traffic congestion on these key routes also risks diminishing the benefit of providing additional housing in adjoining districts if that housing resource is not easily accessible from the City and generates unsustainable commuting patterns.

The University & Colleges note that Oxfordshire County Council launched its most recent consultation on the proposed £35m, LGF financed ‘A40 Eynsham Park and Ride and Bus Lane Scheme’ on the 1st December 2016. The consultation document does not specifically identify the Garden Village proposal, albeit the location of the Park & Ride is the same as that shown in the ‘West Oxfordshire Garden Village Expression of Interest’. It therefore needs to be demonstrated how the Garden Village will interact with the proposed new infrastructure and whether this is sufficient to ensure that there is adequate transport capacity to facilitate the anticipated level of commuting and other journeys from the Garden Village into Oxford and vice versa by sustainable transport i.e. Park & Ride, local bus services and cycling. It is therefore requested that 4.18a is amended so that it makes reference to the delivery of the A40 Eynsham Park & Ride and Bus Lane Scheme to ensure that adequate transport capacity exists in this key corridor to create an effective sustainable transport link between Eynsham and Oxford whereby the new trips generated by the Eynsham Garden Village proposal towards Oxford can be undertaken by mass transit, car-sharing and cycling.
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<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr Hutchinson</td>
<td>2017</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td>new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text. Land &amp; Partners Ltd (L&amp;P) is a privately owned development company which has identified Ascott under Wychwood as a sustainable location for development. A summary of the company’s approach to development is outlined in Section 2.0. L&amp;P objects to Main Modifications 15, 16, 27, 30 and 172 of the current consultation, as set out below. We object to the identification of West Oxfordshire Garden Village as a strategic location for growth next to the Rural Service Centre of Eynsham. The settlement has not been selected by the Government for such an initiative and the eligibility criteria clearly state that the garden village must be a new discrete settlement, and not an extension of an existing town or village. Therefore, the whole strategy of the Plan is on an uncertain foundation; it cannot be demonstrated to be deliverable over its plan period and that it is the most appropriate strategy. Whilst we agree with the recognition that some development will be required in the villages beyond the service centres, we do not consider the wording to be sufficiently precise to ensure new housing is delivered to meet the identified needs of the Plan. Paragraph 4.19 (as amended) has an additional sentence on village growth stating that “A number of site allocations are proposed to ensure the delivery of new housing on suitable, available sites”. This is not considered to be adequate to address the range of opportunities contained within Policies OS2 and H2 (as amended). Policy OS2 (as amended) recognises that some of the Rural Service Centres are relatively constrained and the Council’s intention is that these accommodate only a modest level of development. It correspondingly seeks considerable growth in the less constrained Rural Service Centre of Eynsham and its extension northwards.</td>
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"West Oxfordshire Garden Village"). This provides a very clear and prescriptive framework for growth, which contrasts with the lack of clarity about the villages, where similar opportunities and constraints are unevenly distributed. We seek a more unequivocal statement in paragraph 4.19 on how the ‘village’ tier in the settlement hierarchy is to deliver housing growth.

Policy H2 (as amended) is in part a criteria-based policy for dealing with unallocated greenfield sites in service centres and villages. It states that (provided it is consistent with other policies in the plan) new dwellings in these locations will be permitted on undeveloped land within or adjoining the built up area where the proposed development is necessary to meet identified housing needs. Therefore, it is clear that villages will need to grow through sites that are not specifically allocated within local or neighbourhood plans. We seek more precise wording in paragraph 4.19 that acknowledges how Policy H2 anticipates the delivery of new homes, which explicitly encompasses unallocated sites.

In the circumstances we propose confirmation in paragraph 4.19 that housing development in villages on suitable, available sites will be delivered by means other than specific site allocations. There should be recognition that policies OS2 and H2 (as amended) allow for proposals to come forward on unallocated sites adjoining the village.
Even if it were appropriate to consider the modifications through an SA addendum we believe the addendum itself to be incorrect. The Inspector confirmed in his Interim Findings (INO16) that any new site allocation must be informed by Sustainability Appraisal including assessment against reasonable alternatives. The published SA addendum solely considers two new strategic development sites adjoining Eynsham, rather than seeking to compare any reasonable alternatives.

Those sites closer to Oxford were dismissed out of hand due to Green Belt constraints, while those to the west were dismissed as being too distant from the city. The purpose of the SA is to enable a transparent and balanced assessment of alternative options against sustainability criteria, allowing a judgement to be made. For example a site closer to Oxford would benefit from physical proximity, but present challenges with regard to green belt impacts; a proper SA allows a balanced judgement to be made in a transparent manner offering sound foundations for the plan making process.

The SA does not consider all reasonable alternative options, merely the impacts of the Council’s pre-selected sites. This approach pre-judges the outcomes of the SA, removes the robustness and transparency of the plan making process and results in an unsound Plan.

Evidence base for proposed modifications: The proposed modifications must be informed by a robust and comprehensive evidence base. The modifications to the plan claim to be informed by an updated SHELAA; however this document was not published until 9th December 2016- some four weeks into the six week consultation period on the Local Plan. The sequence of publication suggests the evidence has been tailored to fit the plan, rather than informing the Council’s selection of the most sustainable options. It is clearly unacceptable that this consultation has allowed only a fortnight for inspection of the modifications and evidence base. The SHELAA is fundamental to understanding the soundness of the proposed changes, particularly as the document which accompanied the submitted plan was identified as deficient by the Inspector in his interim findings (INO16).

Failure to undertake proper consultation at this stage leaves any decision upon the plan vulnerable to legal challenge as the plan making process, including consultations have not adhered to proper process.

The limited assessment which it has been possible to undertake of the SHELAA suggests it has been treated as a means to limit development in the district, rather than explore the theoretical capacity of suitable development sites.

Numerous sites, including our client’s land in Ducklington (ref 342) are incorrectly classed as unsuitable for development as surmountable constraints are treated as fundamental barriers to development. For example site 342 (Ducklington) is considered unsuitable for development owing to landscape impacts; however no consideration appears to be afforded to potential mitigation. Furthermore no consideration is given to benefits which can arise from development; in the case of this site the use of playing fields, presently rented by the community, could be secured.

The restrictive approach applied through the SHELAA means it does not fulfil the purpose of the evidence document. It fails to provide the ‘menu of sites’ for assessment to ensure the most appropriate are chosen. This issue was identified by the Inspector in his initial findings (INO16) and does not appear to have been satisfactorily addressed; as a consequence the foundations do not exist upon which the Council can build a sound development plan.
We object to the identification of West Oxfordshire Garden Village as a strategic location for growth next to the Rural Service Centre of Eynsham. The settlement has not been selected by the Government for such an initiative and the eligibility criteria clearly state that the garden village must be a new discrete settlement, and not an extension of an existing town or village. Therefore, the whole strategy of the Plan is on an uncertain foundation; it cannot be demonstrated to be deliverable over its plan period and that it is the most appropriate strategy.

Whilst we agree with the recognition that some development will be required in the villages beyond the service centres, we do not consider the wording to be sufficiently precise to ensure new housing is delivered to meet the identified needs of the Plan. We therefore put forward some revised wording below, to ensure that the Plan is sound.

Paragraph 4.19 (as amended) has an additional sentence on village growth stating that "A number of site allocations are proposed to ensure the delivery of new housing on suitable, available sites". This is not considered to be adequate to address the range of opportunities contained within Policies OS2 and H2 (as amended).

Policy OS2 (as amended) recognises that some of the Rural Service Centres are relatively constrained and the Council’s intention is that these accommodate only a modest level of development. It correspondingly seeks considerable growth in the less constrained Rural Service Centre of Eynsham and its extension northwards (‘West Oxfordshire Garden Village’). This provides a very clear and prescriptive framework for growth, which contrasts with the lack of clarity about the villages, where similar opportunities and constraints are unevenly distributed. We seek a more unequivocal statement in paragraph 4.19 on how the ‘village’ tier in the settlement hierarchy is to deliver housing growth.

Policy H2 (as amended) is in part a criteria-based policy for dealing with unallocated greenfield sites in service centres and villages. It states that (provided it is consistent with other policies in the plan) new dwellings in these locations will be permitted on undeveloped land within or adjoining the built up area where the proposed development is necessary to meet identified housing needs. Therefore, it is clear that villages will need to grow through sites that are not specifically allocated within local or neighbourhood plans. We seek more precise wording in paragraph 4.19 that acknowledges how Policy H2 anticipates the delivery of new homes, which explicitly encompasses unallocated sites.

In the circumstances we propose confirmation in paragraph 4.19 that housing development in villages on suitable, available sites will be delivered by means other than specific site allocations. There should be recognition that policies OS2 and H2 (as amended) allow for proposals to come forward on unallocated sites adjoining the village.

It is noted at paragraph 4.17 that not all growth can or should go to the Main Service Centres of Witney, Carterton and Chipping Norton and the fact that there is a need for development elsewhere within the District, particularly to sustain the more rural parts of the District. We are therefore of the opinion that the
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| MM766 | Land and Partners Ltd | Tom Hutchinson | Mr | Hutchinson | 2077 | > SECTION 4 - OVERALL STRATEGY > MAIN 15 | This representation is made in respect of Land between Witney Road and High Street, Finstock. 

This site is Ref: 267 in the Strategic Housing Land Availability Assessment (SHLAA). The site lies outside the AONB. The owners of the site are willing to make the site available for housing development, as recorded in the SHLAA. We disagree with the assessment of suitability in the SHLAA for the reasons set on in Section 4.7. 

Finstock is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. Our promoted site at Finstock would accord with the above criteria and we propose that the site is allocated to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text. 

Land & Partners Ltd (L&P) is a privately owned development company which has identified this site as a sustainable location for development. L&P has reputation for engaging with the local community and securing high quality design, tailored to the local context. Negotiations are progressing with the landowners and the intention is to engage with residents and the Parish in early 2017. 

Objection to Main Modification 15 
We object to the identification of West Oxfordshire Garden Village as a strategic location for growth next to the Rural Service Centre of Eynsham. The settlement has not been selected by the Government for such an initiative and the eligibility criteria clearly state that the garden village must be a new discrete settlement, and not an extension of an existing town or village. Therefore, the whole strategy of the Plan is on an uncertain foundation; it cannot be demonstrated to be deliverable over its plan period and that it is the most appropriate strategy. 

Whilst we agree with the recognition that some development will be required in the villages beyond the service centres, we do not consider the wording to be sufficiently precise to ensure new housing is delivered to meet the identified needs of the Plan. We therefore put forward some revised wording below, to ensure that the Plan is sound. 

Paragraph 4.19 (as proposed for modification) has an additional sentence on village growth stating “A number of site allocations are proposed to ensure the delivery of new housing on suitable, available sites”. This is not considered to be adequate to address the range of opportunities contained within Policies OS2 and H2 (as proposed for modification). 

Policy OS2 (as proposed for modification) recognises that some of the Rural Service Centres are relatively... |
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<td>MM780</td>
<td>North A40 Land Consortium</td>
<td>-</td>
<td>2122</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td>constrained and the Council’s intention is that these accommodate only a modest level of development. It correspondingly seeks considerable growth in the less constrained Rural Service Centre of Eynsham and its extension northwards ('West Oxfordshire Garden Village'). This provides a very clear and prescriptive framework for growth, which contrasts with the lack of clarity about the villages, where similar opportunities and constraints are unevenly distributed. We seek a more unequivocal statement in paragraph 4.19 about how the 'village' tier in the settlement hierarchy is to deliver housing growth. Policy H2 (as proposed for modification) is in part a criteria-based policy for dealing with unallocated greenfield sites in service centres and villages. It states that (provided it is consistent with other policies in the plan) new dwellings in these locations will be permitted on undeveloped land within or adjoining the built up area where the proposed development is necessary to meet identified housing needs. Therefore, it is clear that villages will need to grow through sites that are not specifically allocated within local or neighbourhood plans. We seek more precise wording in paragraph 4.19 that acknowledges the wording of Policy H2 in anticipating the delivery of new homes, which explicitly encompasses unallocated sites. In the circumstances, we propose confirmation in paragraph 4.19 that housing development in villages on suitable, available sites will be delivered by means other than specific site allocations. There should be explicit recognition that policies OS2 and H2 (as proposed for modification) allow for proposals to come forward on unallocated sites adjoining villages.</td>
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<tr>
<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>2143</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td>Main Modification 15 introduces an amendment to the emerging Local Plan 2031 to reflect that the Eynsham sub-area is now proposed to accommodate more growth than originally envisaged in the submission draft Local Plan as a result of accommodating additional housing at Eynsham to meet Oxford City’s unmet needs. As above, the Consortium generally supports the proposed modifications to Policy OS2, with particular and specific reference to the creation of a new rural service centre to be created to the north of Eynsham comprising a self-contained settlement based on 'garden village' principles.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>2291</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td>We continue to support the Council’s settlement hierarchy in this respect. The Policy itself advises that: &quot;A significant proportion of new homes, jobs and supporting services will be focused within and on the edge of the main service centres of Witney, Carterton and Chipping Norton. A number of site allocations are proposed to ensure needs are met. Further allocations may be made through Neighbourhood Plans.&quot; We support the recognition that Witney is a suitable location to accommodate additional development.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>2292</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td>Consider rephrasing to better reflect key public health priorities for reducing inactivity and obesity: Although specific issues, such as safety and inclusivity, are mentioned no general statement on wanting to improve the health and wellbeing of the Districts residents is included within ‘High Quality Design’. Key general points to consider including might be: *.an environment which provides opportunities for people to be more active e.g. sports, leisure, walking and cycling as modes of transport, open spaces for play.</td>
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<td>Accessible and adaptable housing and dementia friendly, fully accessible public spaces to allow people to</td>
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<td>MM95</td>
<td>GMM</td>
<td>Miss Mangley</td>
<td>243</td>
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<td>MM113</td>
<td>Jamie Harrison</td>
<td>Mr Harrison</td>
<td>281</td>
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<td>MM129</td>
<td>Andrew Mosson</td>
<td>Mr Mosson</td>
<td>324</td>
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<tr>
<td>MM263</td>
<td>Elizabeth Begley</td>
<td>- Begley</td>
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<tr>
<td>MM61</td>
<td></td>
<td>NP Mr Pearce</td>
<td>534</td>
<td>628</td>
<td>MAIN 15, Para 4.18a</td>
<td>Not sound</td>
<td>Small scale development has had a damaging effect on Woodstock. A large scale development would likely destroy the historical character of Woodstock due to the increased transport, parking, health and school place requirements which would do irreparable damage</td>
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<tr>
<td>MM328</td>
<td></td>
<td>Russ Canning Mr Canning</td>
<td>608</td>
<td>628</td>
<td>Main 15 Paragraph 4.18a</td>
<td>Not Sound</td>
<td>The terminology attached to the proposal to build 2,200 houses north of Eynsham as a “Garden Village” is simply greenwash developer speak with no credible identification of what this actually means. The DCLG document of 16th March 2016 “Locally-Led Garden Villages, Towns and Cities” sets out some of the criteria which Garden Villages must meet? &quot;They must work as self-sustaining places, not dormitory suburbs. It is important for the new community to establish a clear and distinct sense of identity “…..they should not be “ an extension of an existing town or village “ The Local Plan actually admits that the Garden Village is largely intended to serve as</td>
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a dormitory for Oxford’s overspill, thereby completely undermining the concept of a self-sustaining place. The site’s proximity to Eynsham village also undermines the second and third criteria of a Garden Village, as the proposed development would form a village extension with no freestanding identity.

What is being proposed is, therefore, a spectacularly poorly conceived housing estate in valuable countryside, which will adversely affect the quality of life of thousands of local residents and millions of motorists passing by in either direction on the A40.

4.7, Excellent principles of reduced out commuting, increased self containment, reduced private car use, minimised climate change, but contradicted by other larger scale policies (see comments above on the defects of satellite development outside the green Belt (GB)).

4.18, Garden Village north of Eynsham: see comments on strategic vision. Notwithstanding my principled objections to the faux strategy of satellite commuter villages, this location has fewer intrinsic objections than many places in the District if one accepts the SMHA targets and the need to provide for Oxford’s overspill. However, the risks are undeniably great: for example, lagged provision of facilities, failure to grow an overspill community, intolerable congestion/ cost/ pollution on the A40 (made worse by Northern Gateway traffic at the two north Oxford roundabouts). The social risks are especially high if a resilient and balanced community of income, education, age and employment fails to emerge from Oxford’s overspill.

4.18a, “garden village” principles: if this is to be successful, inter alia, the betterment problem must be resolved by the village capturing and investing the socially produced land value, rather than enhanced land value being appropriated by the landowner (Letchworth Garden City, etc.).

Policy SO 2, enlarging major towns is the correct policy, notwithstanding my criticism to the lack of a county strategy. Eynsham cannot accept a western SDA and Garden Village because the quantum of development is too great for a village of 5000 people. The central facilities, roads and services would be overwhelmed. Community cohesion would be severely challenged. The problem would be at its most damaging during the construction of the new houses and before the necessary infrastructure were in place.

Policy SO 2, General Principles: scale and pattern of settlements; amenity; local landscape; access to services: these would be negated by the scale of proposed Eynsham development.

Policy SO3, “minimise the need to travel” is expressly contradicted by not matching homes and jobs in Oxford. Meeting Oxford’s housing need at the Garden Village requires commuting, notwithstanding the proposed large employment/ science park, which would in itself generate in commuting from the District and County.

Policy OS 4, High Quality Design: zero carbon design should be a primary principle.
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<tr>
<td>MM363</td>
<td>Oxford City Council</td>
<td>Ms Dell</td>
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<td>683</td>
<td>&gt; SECTION 4 &gt; OVERALL STRATEGY &gt; MAIN 15</td>
<td>Policy OS 5, Supporting Infrastructure: no dwellings should be be built in the west Eynsham SDA without a western distributor road being built first; and no dwellings should be built in the Garden Village before provision of a convenient link to an enlarged Hanborough Station and comprehensive A 40 and Toll Bridge improvements ( public transport, cycling, etc.). Policy CO 4, reduce need to travel: see comments above. Oxford City's unmet housing need As a result of the continued joint working arrangements through the SHMA it does now appear that the modifications to the Local Plan include revisions to their housing policies to include an element of Oxford's 'unmet' housing need of some 2,750 dwellings. This has been achieved principally by identifying two new strategic site allocations comprising West of Eynsham and north of the A40 new Eynsham (new 'garden village'). These new sites identified in Eynsham were originally highlighted by the consultants through the joint working arrangements as part of the Post SHMA apportionment. These sites were explored as spatial options for additional housing provision and subject to sustainability assessment. This showed the value of all partners working together to prepare and agree the evidence base using shared working assumptions. They do appear therefore to be the most realistic options for seeking to help meet Oxford's unmet housing need. Support: Oxford City Council wish to support in principle the revised changes to the Local Plan and in particular: * Main Mod 4 (Para 2.9), together with those in Main Mod 9 (Vision) and * the Overall Strategy (Paras 4.17 and 4.18 and 4.18a) which show the local authority's commitment to 'play a role in helping to meet wider needs' including the 'unmet housing needs' of Oxford (Main Mod 15) through the allocation of the Eynsham site and the Garden Village. Objection: The City Council consider that it would be helpful if a separate published housing trajectory could be provided with their AMR each year to demonstrate progress made in meeting the housing needs of the city, nomination rights for affordable housing and provision extended to OCC housing list. Given the proposed allocations are to help to contribute towards meeting Oxford's unmet housing need it would therefore be important to understand and agree how the 'affordable housing' element will be provided. For example the proportion and type of affordable housing that will be delivered should as near as possible be shown to relate to Oxford's need. Another key issue of concern is transport and infrastructure which arises from the sustainability assessment which does highlight the existing traffic and congestion problems currently experienced along the A40 leading into Oxford. In this context it will be vitally important to the delivery of this housing development that the proposed infrastructure improvements to the A40 (including new bus lanes and significantly improved cycling facilities and routes) is agreed as part of the wider transport strategy for the County and that evidence to show how it fits in with the revised Oxford Transport Strategy is essential to the successful delivery of this major project. Prior to the development taking place these transport and infrastructure mitigation measures should be agreed and appropriate funding secured to ensure that these are fully implemented before development takes place.</td>
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A detailed transport assessment should therefore be required by future developers, and submitted to the County Council as Highway Authority, but also widely consulted upon with neighbouring authorities such as Oxford City Council to show how this significant amount of new housing development will meet the standards of a truly ‘sustainable development’. It is therefore considered important that the amount of car parking is reduced to a minimum and good alternative cycling and pedestrian facilities (both routes and significantly improved surface treatment) and public transport options (Park and Ride and bus services) is provided.

Public transport bus links either from the Park and Ride or other bus options should ensure that there are regular services provided to existing nearby train stations serving London such as Hanborough (Worcester - Paddington) and Oxford Parkway (Oxford to Marylebone).

Given the scale of the new development being proposed by the allocation of the new strategic site allocations it will be important to fully take into account the local transport, education and health implications for the existing settlement at Eynsham.

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<tr>
<td>MM33</td>
<td>Nicholas Goodwin</td>
<td>Mr Goodwin</td>
<td></td>
<td>70</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
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<td>4.18: the plan does not include any evidence that such a link road would be the best way of handling the likely traffic difficulties. Better public transport, possibly including a guided busway or light rail link, would not only help new Eynsham residents but also those travelling from Carterton or Witney</td>
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<td>MM375</td>
<td>Charlbury Town Council</td>
<td>Mr Clarke</td>
<td></td>
<td>727</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
<td></td>
<td>Policy OS2 - Locating development in the right places</td>
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<td>Reason:</td>
<td>We are concerned that the promise (relating to Bampton, Burford and Charlbury) to &quot;reinforce their existing service centre roles&quot; has been removed, and replaced with a statement that &quot;the focus on development... will be more limited&quot;. This removes a key objective to preserve and promote the viability and site availability of the rural towns’ retail and employment roles, including lifeline services such as Post Offices. (The equivalent statement for other settlements has been retained: for Woodstock, to &quot;enhance local services and reinforce its role as a service centre&quot;; and for villages, to &quot;help maintain the vitality of the local community&quot;.)</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td>755</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 15</td>
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<td>MAIN 15 Para 4.18c: Distribution of Development</td>
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<td>Stagecoach supports the amendments which are consistent with the revised development strategy that has been selected in line with the need to positively plan to provide for the development needs of the District, and meet a proportion of the City of Oxford's unmet OAN.</td>
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<td>In particular, Stagecoach agrees that it appropriate to state that developments at the remaining Rural Services Centres, beyond the five largest settlements in the District, will be “more limited”. This is entirely consistent with the requirement set out at NPPF para. 17, which requires that patterns of development should be “actively managed to take advantage of the opportunities for sustainable transport”. Beyond these five settlements, and Long Hanborough, these opportunities are generally substantially fewer. This is particularly true the further from Oxford the settlement lies.</td>
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<td>MM425</td>
<td>Carterton Construction</td>
<td>- Construction Carterton Construction</td>
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<td>942</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt;</td>
<td>2.1 As set out in the supporting settlement hierarchy to the policy, after the three main service centres of Witney, Carterton and Chipping Norton, the next tier of settlements is the rural service centres comprised of:</td>
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2.2 We continue to support the Council's settlement hierarchy in this respect. The Policy itself advises that:

"The rural service centres of Bampton, Burford and Charlbury are relatively constrained and are intended to accommodate a modest level of development of an appropriate type that will help to reinforce their existing service centre role. A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans."

2.3 We support the recognition that Burford is a suitable location to accommodate additional development and that this is important to reinforce its existing service centre role. The Council's updated Settlement Sustainability Report (November 2016) which is published in support of the consultation classifies Bampton as being within the top six most sustainable settlements in the District (weighted and unweighted).

2.4 Proposed paragraph 4.18c of the supporting text states that:

"The focus on development at the existing rural service centres of Bampton, Burford and Charlbury will be more limited. These service centres contain a good range of services and facilities but are constrained in terms of their capacity to accommodate further development. Bampton already has a large housing scheme of 160 homes under construction and site allocations are proposed in Burford and Charlbury to ensure the delivery of new housing on suitable available sites, including the delivery of much needed affordable housing."

2.5 Burford falls within the Burford-Charlbury Sub-Area of the Plan. Our comments in relation to the suitability of Burford to accommodate additional development and the suitability of our client's site to the east of Burford are discussed in relation to the proposed modifications to the Burford-Charlbury Sub-Area below, and as such are not repeated here.

2.6 In summary the Council’s recognition of the sustainability of Burford is supported, however it is considered that the settlement is capable of accommodating additional development to help meet the Council's objectively assessed need and our client considers its wider landholding to the east of Burford should be allocated to meet these requirements. We consider this matter in greater detail in respect of Main Modification 200 below and as such do not repeat this here.

We would request that the policy makes it clear that new infrastructure required to mitigate the impact of development should be funded by developer contributions via CIL or provided on site via S106 Agreements, subject to the relevant policy tests.
When the Local Plan was originally developed, it made sense to concentrate housing developments in the three market towns. However, it is not appropriate to merely extrapolate the original allocations to take the additional numbers required by the Inspector and the SHMA. In particular, it is not sustainable to allocate an additional 800 homes to the Chipping Norton SDA. The percentage of residents employed locally has been falling steadily over the last decade and is now below 30%. Employment growth in the County is centred on the ‘knowledge spine’ running from Bicester through Oxford to the South. Chipping Norton is too inaccessible to attract significant potential employers, who will want to locate near the clusters along the spine. The main employment locally is for ‘minimum wage’ jobs in retail and caring sectors. New residents looking for professional or technical jobs will be forced to commute by car using the sub-standard A44 towards Oxford or the more dangerous A361 towards Banbury. The bus service to Oxford only runs hourly and has to cope with the severe congestion in the Wolvercote roundabout area. Access to the North Cotswold railway line at Kingham is also difficult - the connecting bus service is now sparse and unreliable following the County Council cuts, not as implied in para. 7.56.

The additional 800 homes must be allocated nearer to Oxford with easy access to a railway line, thereby linking easily to the main employment areas in the County. The modified Plan already picks up on this logic, by proposing the Eynsham garden village with good links to Hanborough station (and with the potential to be eventually linked to a re-opened railway line to Witney) and with employment areas nearer to the ‘knowledge spine’ clusters. The Chipping Norton “800” should therefore be reallocated to the Eynsham area or sites even nearer to Oxford, with a start date earlier than the 2021 proposed for the garden village.

The Chipping Norton Eastern Link Road proposed as part of the Tank Farm SDA will not achieve the reduction in HGVs through the town centre - the vast majority of HGVs are on the A44 towards Evesham, not on the A361. The link road will be a “road from nowhere to nowhere”. The money on the link would be wasted and reduce the likelihood of achieving a proper Chipping Norton by-pass on the A44.

The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.

Historic England welcomes and supports Proposed Main Modification MAIN16 for the references to the important historic character of Woodstock and the setting of Blenheim Palace; the intrinsic character of small villages, hamlets and the open countryside; and conserving and enhancing the natural, historic and built environment, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.

We strongly object to the amendments to Policy OS2 which seek to ‘downgrade’ Long Hanborough from its current and long-standing status as a ‘Rural Service Centre’ to a ‘Village’, with the consequential effect of making it appear to be a much less sustainable location suitable only for very minor levels of additional growth. This modification is wholly unjustified and illogical, and is not supported by either fact or evidence. As such it is demonstrably unreasonable and unsound.

Figure 3.1 of the adopted West Oxfordshire Local Plan 2011 identifies Long Hanborough as a ‘Service Centre’, below only the ‘Main Town Centres’ of Witney, Carterton and Chipping Norton in the settlement hierarchy. Figure 5.23 confirms that Long Hanborough, together with settlements including Eymsnham, Woodstock, are ‘Group C Other Centres’, below only the ‘Group C Main Centres’ of Witney, Carterton and Chipping Norton.
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|              |                         |                 |                  |           |                    | Consistent with the approach in the adopted Local Plan, Figure 4.1 of the West Oxfordshire Local Plan 2031 as submitted in July 2015 (CD1), identifies Long Hanborough as one of six ‘Rural Service Centres’ (again in the same category as settlements such as Woodstock and Eynsham) as confirmed in Figure 4.1 of the submitted Plan. Paragraph 4.8 of the Plan as submitted further confirms that:

"Outside of the three main towns……..the focus of development will be the six rural service centres of Bampton, Burford Charlbury, Eynsham, Long Hanborough and Woodstock."

This settlement hierarchy was subsequently reflected in Policies OS2 and EW2 in the Local Plan as submitted, with Policy EW2 confirming specifically that the focus for new development, within the Eynsham – Woodstock Sub Area, would be Eynsham, Long Hanborough and Woodstock.

The settlement hierarchy / strategy in the Local Plan as submitted was underpinned by an evidence base document entitled 'Settlement Sustainability Report - December 2013' (Appendix 1). As set out in Section 3 of that document, the 120 settlements in the District were categorised according to their size, character and role and, in particular, the number of services and facilities they offered. This created four groups, including 'Group C' which comprised 9 towns and villages. Appendix 1 to the document confirms that Long Hanborough is one of the 9 ‘Group C’ centres and, consistent with Figure 5.23 of the adopted Local Plan, it is identified as one of six ‘Other Centres’, together with Eynsham and Woodstock. Appendix 4 of the document confirms that Long Hanborough has one of the fewest ‘Restraint Indicators’ of any of the Group C service centres (identifying only the presence of a Conservation Area), whilst it is identified as fulfilling the significant majority of the ‘Positive Indicators’ - performing very similarly to Eynsham and Woodstock.

This evidence therefore fully supports the identification of Long Hanborough as a Rural Service Centre. However, since submitting the Local Plan 2031 (CD1) in July 2015, and since the initial Examination sessions in November 2015, the Council now advances the position that Long Hanborough no longer fulfils a role as a ‘Rural Service Centre’ and should be downgraded to a ‘Village’.

Given the conclusions of the 2013 Settlement Sustainability Report, which echoed the approach in the adopted Local Plan i.e. that Long Hanborough has for some time met the criteria warranting Rural Service Centre status, this is a somewhat remarkable proposition and suggests that there must have been a significant reduction in the sustainability of the village by virtue of the facilities / services that it offers.

However, there has demonstrably been no such reduction.

Indeed, not only has there been no reduction in facilities but in fact, as a result of recently approved developments at Long Hanborough, not only has additional housing been consented but these developments will also deliver significant improvements to both doctors’ surgery provision and education provision in the village (the proposals by Pye Homes on land south of Witney Road, Long Hanborough, allowed on appeal in July 2016, include the provision of a new and much larger doctors’ surgery, and the provision of additional land for the expansion of the existing primary school). Furthermore, since 2013, Great Western Railways (GWR) has confirmed that services from Hanborough Station will be increased (as reflected in the Local Plan as modified), as will the capacity of the trains running through it. In addition, GWR has identified longer term and even more substantial aspirations to dual the rail line and provide significantly enhanced station facilities and car parking...
As such it is simply not the case that Long Hanborough is any less sustainable now than it was in 2013 when the Settlement Sustainability Report was produced, or in 2015 when the Local Plan was submitted. Indeed, quite the contrary - it demonstrably has even more to offer.

We note that the Council has now produced an updated version of its Settlement Sustainability Report dated November 2016 (Appendix 2). It is in this document that you would expect to find evidence to support the Council's proposed downgrading of Long Hanborough.

However, unsurprisingly given the facts, no such rationale exists in this document.

In fact, Section 2 of this revised document simply repeats the conclusions of the previous 2013 document, identifying Long Hanborough as a Rural Service Centre. Reductions in service provision in some villages are noted at paragraph 5 of the document, but none of these reductions relate to Long Hanborough. Improvements in service provision in some villages are also noted, although the clear improvements at Long Hanborough (summarised above) are for some reason omitted.

Reference to Section 4.6 of this document confirms that whether an unweighted score of sustainability is used, or a weighted score, Long Hanborough meets the tests to warrant Rural Service Centre status (although it would seem that the weighted approach, which gives greater weight to the availability of key facilities such as Post Offices, Primary Schools, Doctors and local employment opportunities over less fundamental facilities, should be the preferred method of assessment).

As such it is evident that neither the 2013 Settlement Sustainability Report, nor the latest 2016 version, support the Council's proposed downgrading of Long Hanborough.

Indeed, if the downgrading of any 'Rural Service Centre' to a 'Village' was warranted (which is demonstrably not the case) then logic would suggest that it would be the least sustainable of the Rural Service Centres. However, the Council's own evidence confirms that the least sustainable of the Rural Service Centres is Bampton (and Section 2 of the 2016 document confirms that Bampton has in fact lost a shop since the 2013 survey). However, perversely, this settlement retains its Rural Service Centre status whilst Long Hanborough is proposed to be downgraded.

To add to these concerns, footnote 1 to the 2016 document (which adds detail to the Council's conclusion that Long Hanborough is a Rural Service Centre) notes that notwithstanding the conclusions of this evidence base document:

"...proposed modifications to the submission draft Local Plan seek to re-classify Long Hanborough as a village rather than a rural service centre although as this proposal remains in draft form only this report continues to classify it as a rural service centre."

This is a remarkable statement by the Council. This is a clear written admission that the proposal to downgrade Long Hanborough is not an evidence-based amendment, but an amendment made contrary to the available and up to date evidence. The Council is saying, overtly, that if the downgrading of Long Hanborough is endorsed through the Local Plan process, that the evidence base will be amended to reflect that.

As the Council is well aware, the Local Plan process is an evidence-based process. It is not a process
whereby ad hoc / politically motivated proposals can be advanced and accepted, with evidence subsequently amended or produced to post-justify such decisions. To do so would make a mockery of, and wholly undermine, the plan-led process advanced by the NPPF. Against this background it is demonstrably the case that the downgrading of Long Hanborough is wholly unjustified and consequently unsound.

I support the amendments to Policy OS2, to locate development in the right places. In a rural area like West Oxfordshire, it is essential that the separate identity and character of our settlements and the surrounding open countryside is maintained.

2.40 The main criticisms and case against the modifications to Policy OS2 are set out in the GL Hearn response to Main 15. However it is necessary to restate the points and to cross refer to Main 15 in respect of the re-worded policy.

2.41 It is worth highlighting that the 2016 SA Addendum concludes that Option 2 (Three Towns – with a focus on Witney, Carterton and Chipping Norton, and limited dispersal across the District) remains the most sustainable approach to allocating development to meet the housing needs of the District. Accordingly Policy OS2 should reflect this spatial strategy, derived from the evidence base, and follow closely the spatial distribution advocated by Option2. The benefits are summarised within the February 2015 version of the SA:

This Option would concentrate development at the three main service centres of Witney, Carterton and Chipping Norton, while also allowing a limited amount of dispersed development across the District. (GL Hearn emphasis)

2.42 With the above in mind it is difficult to justify the policy approach taken in respect of Eynsham, in the context of the settlement hierarchy prescribed at Table 4.1 of the Local Plan (p.35). Eynsham is a rural service centre occupying a second tier ranking within the hierarchy; the function of rural service centres is to accommodate development of ‘an appropriate scale’ and type to reinforce their role as such. In contrast Policy OS2 now elevates Eynsham’s status (relative to other second tier centres) ascribing it a role of ‘significance’ in meeting identified housing needs – the implication being those arising under the duty to cooperate and in respect of the District’s own OAHN. This approach is not consistent with the evidence base, which acknowledges that Eynsham has a role to play in helping to meet Oxford’s unmet need for housing, within the terms of reference set out by the Oxfordshire Growth Board, but does not consider it as a candidate location to accommodate strategic scale development under the spatial distribution advocated by the SA process. In this context the policy approach to Eynsham within OS2 is not justified against the evidence base.

2.43 OS2 refers to the decision to allocate a new Garden Village north of the A40, which will be self-contained. The evidence on which this decision relies considered the role of Eynsham as a candidate location specifically to meet the unmet housing needs of Oxford. The land to the north of the A40 was introduced at this stage of plan-making in response to the Inspector’s Preliminary Findings, which advised that further spatial options would need to be considered via SA if the Local Plan was to make provision for meeting housing needs under the duty to cooperate. The new village option was therefore re-considered.

The policy should therefore be clear that the new settlement is dedicated to this purpose and worded accordingly.

2.44 As set out in response to Main 15 there is no evidence to justify the contention that Woodstock is suitable for what the Local Plan purports to be a ‘reasonable scale’ of development. ‘Reasonable’ in the
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<td>context of a settlement with a population of c. 3,000 people, is not considered to be an increase of c.45% in the size of the town. Furthermore in what is undoubtedly a highly significant location in heritage terms there is an extremely surprising lack of evidence as to the potential impacts that development (on what contextually and cumulatively is a significant scale) in close proximity to the WHS would have on the integrity of this highly sensitive receptor. 2.45 An extract from the UNESCO description of Blenheim Palace (Appendix 1) is reproduced below highlighting the important considerations applying to development within the setting of the WHS: Integrity 2.46 The integrity of the property is well protected by its enclosing wall but important visual links do exist between the gates, the parkland buildings, buildings in the surrounding villages and landscape, and care needs to be taken to ensure these key visual links are protected. 2.47 There is no published evidence on which the Council is relying that demonstrates to any reasonable degree how the Council has considered and responded to the sensitivity of the important visual links between the WHS and the surrounding landscape. On this basis the approach taken to the allocation of a cumulatively strategic scale of development at Woodstock is clearly unsound when considered against the NPPF requirement to base policy-making on a proportionate evidence base. The sensitivity of the receptor demands that a highly precautionary approach to the allocation of any development within the setting of the WHS is taken. In contrast the Council has determined, in absence of any considered heritage assessment (pursuant to paragraph 169 of the NPPF), that Woodstock is an appropriate location for significant development. This approach is considered to be contrary to paragraph 182 (bullet 2) of the NPPF. Main 21: Paragraph 5.1 3.1 Paragraph 5.1 is modified to qualify the approach that should be taken to managing the delivery of housing. The requirement to manage growth effectively to ensure that ‘significant change’ to the ‘intrinsic character’ of the District is prevented is not applied consistently within the Local Plan. 3.2 The intrinsic character of the District is described at paragraph 2.3 of the Local Plan, with expansion (via modification) at paragraph 2.49. Key characteristics of the District are held to be: * Predominantly rural character; * Strong sense of place from the Cotswold vernacular building style; * Rolling countryside; * Sparse population density; * One third of the District is covered by AONB notation; and * The rich and varied historic environment. 3.3 The historic environment is described as ‘contributing greatly to the distinctive character and identity of the area’. It is contended that effective management of growth (via the plan-making process) has not taken place; the spatial options that the Council is now proposing fail to accord with this undertaking. Clear examples of the disconnect between the ambition set out at paragraph 5.1 and the practical application of policy arise in respect of the proposed allocations at Woodstock, within the setting of the WHS, and the failure to allocate any strategic scale development at the Main Service Centre of Carterton, a location unaffected by the majority of the District’s defining characteristics that contribute to the intrinsic character, which is to be protected. 3.4 While the intention of the modification is supported, it is not applied to the policy-making process and</td>
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<td>therefore there is internal inconsistency, which is unsound through being unjustified having regard to NPPF paragraph 182.</td>
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<td>NP</td>
<td>Mr Pearce</td>
<td>146</td>
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<td>The Stanton Harcourt Estate supports that the 'villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. A number of site allocations are proposed to ensure identified needs are met.' This principle is in line with the paragraph 55 of the NPPF. The Estate agrees with the principle that the villages are suitable for development which respects the character and local distinctiveness, and would help to maintain the vitality of these communities. It is, nevertheless, considered that the use of 'limited' suggests a cap on the volume of development to the villages. It is noted that development which respects village character will generally be limited in nature, and so explicit reference to this is not deemed wholly necessary. Furthermore, identification that the figures in the policy are not to be considered a 'maximum ceiling to development' (Main 24) is supported as being in line with the NPPF. The Estate also support the Council's objective that new dwellings will be permitted on undeveloped land adjoining the built up area where the proposed development is necessary to meet identified needs (Main 50). Furthermore, our client acknowledges the amendments to the Settlement Hierarchy at Table 4.1 (Main 14) Stanton Harcourt continues to be appropriately classified as a 'village' location, the sustainable credentials of which are reported by the Council's Settlement Sustainability Report (SSR, November 2016). The SSR reports both an unweighted and weighted score for the settlements assessed. In both scenarios the sustainable credentials of Stanton Harcourt are recognised (scoring 7 and 20 respectively).</td>
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>1522</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>These principles state that all development should (1) “not involve the loss of an area of open space or any other feature that makes an important contribution to the character or appearance of the area”. Clearly, the Garden Village will do precisely that on a grand scale, nor is there any way of avoiding it. All development should (2) “not have a harmful impact on the amenity of existing occupants”. Given that the nine dwellings in and around City Farm are envisaged to be entirely surrounded by new homes and roads, street lights and other urban paraphernalia, how can the Garden Village not have a harmful impact on this amenity (defined as “the pleasantness of a place” by the Concise Oxford English Dictionary)? All development should (3) “safeguard mineral resources”. There are sand and gravel deposits within the Garden Village site, some parts of which, towards the south, are commercially viable to exploit. The village will build over these, or, if some parts are eventually exploited, they will be right next to the new residents. Is that OK by everyone?</td>
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CPRE supports the existing designation of the Shill Brook as a Conservation Target Area as noted in 9.3.27, 9.3.88 and 9.3.90, as it's clearly an important and ecologically sensitive location in the sub-area. CPRE supports the planned enhancement, so that the natural environment and ecology in this area and adjacent Local Wildlife Sites and the SSSI is protected. In this regard, CPRE supports policies OS2 & OS4 which seek to protect important landscape, conserve the natural environment and habitats of biodiversity value. This is not a new or revised point in the Draft Local Plan, but it does mean that the alternative option to
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| MM721        | The Blenheim Palace Estate | -               | Neilson          | 1625              | > SECTION 4 - OVERALL STRATEGY > MAIN 16 | 2) Policy OS2 - Locating Development in the Right Places  

  The Local Plan generally seeks to focus development in sustainable locations and such an approach, in so far as it reflects the National Planning Policy Framework, is supported.  

However, whilst Policy OS2 generally promotes development in those locations where facilities and services are readily accessible, it proposes to remove Long Hanborough’s “Rural Service Centre” status and instead, place the settlement in the “Small Villages, Hamlets and Open Countryside” category.  

As set out below, this is a contrived approach. It appears intended to support the proposed allocation of land for a Garden Village some 3 km to the south of Long Hanborough. If a new Garden Village is to be considered, it should be capable of coming forward without any accompanying need to “downgrade” the status of existing settlements.  

The approach set out is in direct conflict with national policy and contradicts West Oxfordshire District Council’s own Report accompanying the proposed changes to the Local Plan. This concluded that the proposed changes to the Local Plan would:  

“...also support the Council’s ability to work in partnership to sustain economically prosperous towns and villages with full employment.”  

In contrast to this, the proposal in the Local Plan to “downgrade” Long Hanborough to the Small Villages, Hamlets and Open Countryside category would severely and inappropriately restrict sustainable development. It would serve to frustrate and prevent investment into the settlement’s economy. Sustainable development would be prevented and this would harm the settlement’s future.  

Long Hanborough has a main line railway station, providing West Oxfordshire’s most rapidly growing railway service (as recognised by the Local Plan as comprising exceptional growth with much scope for more), providing frequent trains and West Oxfordshire District’s fastest direct route into central London. The settlement also has, amongst other services and facilities: an approved and funded new Doctor’s Surgery, which has been sized to accommodate the anticipated expansion of the established Rural Service Centre; an expanded Primary School; two supermarkets; a petrol station; a range of shops; 2 pubs; and an employment area/business park. There can be no disputing Long Hanborough’s status as a sustainable settlement.  

Long Hanborough’s long-standing role as a Rural Service Centre means that the settlement has grown, and continues to grow, in a sustainable manner, such that new development takes place alongside and supports existing, new and enhanced facilities and services.
Long Hanborough is not a small village and nor is it a hamlet. Rather, it is established as one of the District’s most important and accessible Rural Service Centres. More, it has plenty of identified opportunities for growth around it.

Recently approved housing developments will add several hundred more homes to Long Hanborough. This will inevitably result in increased demand for new and enhanced services and facilities within the settlement. Such improvements form an important and integral part of continuing sustainable growth, in line with national planning policy. Severely downgrading the settlement’s status would simply serve to frustrate investment. It would be in direct conflict with national planning policy, such that sustainable growth would be prevented, not encouraged.

Long Hanborough is a large, well-served and growing Rural Service Centre with significant employment areas and an increasingly busy train station. The proposed changes to Policy OS2 fail to acknowledge Long Hanborough’s long standing status as a Rural Service Centre and ignore its continually developing role as one of West Oxfordshire’s most important and sustainable settlements.

The previous iteration of the draft Local Plan sought to place “a particular focus” on Long Hanborough’s role as a Rural Service Centre in respect of providing for housing need. The only thing that has happened since this previous draft is that Long Hanborough has grown in size and that large-scale applications have been approved, such that it will continue to grow in size. Its established status as a Rural Service Centre has become even more established. Long Hanborough has become more sustainable.

This leads to the inevitable question, why suddenly decide to suggest that one of the District’s most sustainable settlements as something it is not – a small village or hamlet – and suggest that it is no longer something that it is - a Rural Service Centre ?

The proposal to demote Long Hanborough does not, in any way, support the allocation of land for a new Garden Village without the support of an appropriate and robust site assessment process.

No substantive evidence has been provided to demonstrate that Long Hanborough has become less sustainable. It is a long-established Rural Service Centre. It appeared as such in the previous draft Local Plan and comprises a Rural Service Centre in the adopted Local Plan. The absence of substantive evidence is largely because Long Hanborough is a Rural Service Centre where sustainable growth is continuing to take place – because it is appropriate for it to do so.

A Rural Service Centre does not suddenly cease to exist as a service centre, unless its services and facilities somehow disappear, or largely diminish. In the case in Long Hanborough the direct opposite is happening. This is evidenced by such things as new housing, new approved developments, the rapid and continuing expansion of rail travel from Long Hanborough’s station, proposals to expand the school and a new doctors’ surgery.

Long Hanborough is a thriving Rural Service Centre. This reflects the settlement’s sustainable qualities.

West Oxfordshire District Council, in defence of its attempt to “demote” Long Hanborough, claims that there is no longer general “scope for further development” around the settlement and proposes a far more restrictive approach founded, apparently, on there now only being “some scope for very modest” development.
This is simply not the case. There is plentiful land adjacent to the settlement which can be developed without any harm in respect of, for example, flooding, the AONB or the Oxford Green Belt (which is some miles distant).

Land capable of providing for hundreds of houses are currently being promoted on the edge of Long Hanborough. This land is within walking distance of village services, outside the AONB and can be brought forward in a sustainable manner. The land is readily deliverable. Given the sustainable nature of Long Hanborough as a long-standing and growing Rural Service Centre, readily deliverable land on the edge of the settlement would have very significant sustainability benefits. Such benefits support the continued sustainable growth of Long Hanborough.

In light of the above, an interesting sustainability comparison could be made with the continued growth of Long Hanborough and the proposed allocation of land for a “Garden Village” in the open countryside. However, it is noted that no appropriately robust site allocation process has taken place in respect of the Local Plan’s “Garden Village” proposals, so it is not possible to understand how the sustainability of Long Hanborough, for example, compares to the sustainability of land in the open countryside.

It is also pertinent to note that planning applications for large-scale housing development in and around Long Hanborough continue to result in planning permissions. Such permissions are due, in large, to Long Hanborough’s sustainable status and its related capacity for sustainable growth.

However, despite this, West Oxfordshire District Council, in the Report to Committee that accompanied the proposed changes to the Local Plan, referred to:

“...the relatively limited scope for further development in Long Hanborough.”

No substantive evidence has been provided to substantiate this assertion. By way of contrast, there is evidence of significant potential for the sustainable growth of Long Hanborough. For example, there is much scope for considerable and appropriate development immediately to the west, south and south west of the settlement. It is unclear why this potential for growth has been ignored.

Whilst no substantive evidence has been provided to support the major change proposed by “downgrading” the status of Long Hanborough, there is plentiful evidence, including existing planning applications and representations made to West Oxfordshire District Council’s latest housing land assessment (SHELAA), of there being readily deliverable opportunities for development adjacent to the settlement. These can appropriately provide for housing and for other uses, including, for example a new primary school. None of the land is within the AONB, which lies to the North of the settlement and all of the land is within easy walking or cycling distance of Hanborough Station, which the Local Plan earmarks for substantial growth as a major “transport hub.”

Taking all of the above into account, the changes to the Local Plan appear to seek to prevent sustainable development. This is in direct conflict with national policy.

West Oxfordshire District Council has a statutory duty to provide for sustainable development. It is imperative that the Local Plan continue to recognise Long Hanborough’s status as a Rural Service Centre and plan for the settlement’s continued sustainable growth.

Unusually, the Council’s own Report to Committee, accompanying the proposed changes to the Local Plan,
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| MM722         |                         | Graham Flint    | Mr               | Flint             | 1634       | > SECTION 4 - OVERALL STRATEGY > MAIN 16 | claimed that no longer considering Long Hanborough as a Rural Service Centre would avoid “an over-concentration of Rural Service Centres” in this location should the proposed “Garden Village” come forward! This can only be described as a proposition that lacks credibility, irrespective of whether or not the proposed Garden Village comes forward. Taken plainly, it is an approach that suggests that something that already exists should no longer be considered to exist because something else might exist in the future. This appears to be the kind of existentialist proposition that led Jean Paul Sartre to entitle one of his work’s “Nausea.”

Long Hanborough is a successful Rural Service Centre and as such, it is a sustainable settlement. The very point of sustainable development is to provide for appropriate growth. Seeking to create a new, motor-vehicle based, Rural Service Centre on a greenfield site some 3 km away, whilst relying upon the sustainable transport credentials of the existing Rural Service Centre of Long Hanborough, whilst at the same time, seeking to severely and unnecessarily restrict the continued sustainable growth of Long Hanborough, would simply comprise poor planning.

If an underlying principle of planning for the future was to prevent the prevalence of Rural Service Centres in the sub-area, then, sensibly, logically and reasonably, the Local Plan should not seek to create another one where one does not currently exist.

It is noted that, had the provision of a Garden Village in the District emerged through a proper and robust planning assessment and consultation, then the possible impacts of the “over-concentration” of Rural Service Centres might have been duly and appropriately considered. This policy makes no explicit reference to the ability of Long Hanborough to accommodate development. The submission Local Plan stated that:

‘The rural service centres of Bampton, Burford, Charlbury, Eynsham, Long Hanborough and Woodstock are suitable for development of an appropriate scale and type that would help to reinforce their existing service centre role. Sites may be specifically identified by the Council within or on the edge of some of these service centres, including through Neighbourhood Plans.’

Under Main Modification 16 Long Hanborough has been removed from the Rural Service Centres and designated as a village. The text that relates to villages states that: ‘The villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities.’

The replacement of the words ‘development of an appropriate scale and type,’ with ‘limited development,’ represents a significant change in the proposed policy. It is considered that this is not justified, based on the significant range of services located in Long Hanborough which include a number of shops, including a Co-op food store; full time Post Office; Primary School; Community Building; Public Houses; places of worship; doctors’ surgery; playing fields; petrol filling station; local employment opportunities; bus service and railway station. The presence of these services as listed in the Sustainability Matrix of the Council’s ‘Settlement Sustainability Report,’ (November 2016) demonstrates that Long Hanborough has the necessary services and facilities to represent a sustainable location for development and this demonstration would be even more pronounced if due recognition of the importance of the rail station and evening services was given in the settlement scoring as set out in the JA Pye (Oxford) Ltd representations on Main Modification 14.

In addition, a number of significant improvements are due to be made to services in Long Hanborough. These include a new spacious doctors’ surgery for which planning permission was obtained in July 2016 and which has to be provided as part of the residential development on the land south of Witney Road granted planning
permission on appeal (ref: APP/03125/W/15/3129767). This will replace the current cramped doctors’ surgery, which is well below NHS England standards of provision for the population it serves, and not only improve facilities for existing residents, but also provide the capacity for the provision of more homes in Long Hanborough. In addition, a new playing field is to be provided for Hanborough Manor School, for which planning permission has been obtained by J A Pye (Oxford) Ltd on appeal (ref: APP/D3125/W/15/3139807), which will provide a much improved playing field for the use of the school, and enable the school to expand to accommodate extra residents.

Another reason why Long Hanborough is suitable for more than limited development is its close relationship to the City Deal and its location very close to the ‘knowledge spine’ identified in the City Deal, which stretches from Science Vale, near Didcot to Bicester, with Oxford at its heart, as detailed in the representations submitted on behalf of J A Pye (Oxford) Ltd in relation to Main Modification 14. Two key proposed employment sites that are close to Long Hanborough and which housing there would help to serve are the Science Park at Begbroke, which Cherwell District Council has identified in its Local Plan 2011 - 2031 (adopted July 2015) policy Kidlington 1 for Accommodating High Value Employment Needs and the Northern Gateway, which adjoins the A44 at the northern edge of Oxford, which Oxford City Council has allocated in its Northern Gateway Area Action Plan (adopted July 2015) policy NG2 for up to 90,000 m2 of employment uses that directly relate to the knowledge economy and include science and technology; research; bio-technology; and spin off companies from the universities and hospitals.

With further improvements proposed to the rail station and rail line as detailed in paragraphs 7.57a; 7.57b and 9.5.16 of the Local Plan the suitability of Long Hanborough to support development will improve further in the future.

The National Planning Policy Framework (NPPF) makes it clear that one of the Core Planning Principles that underpins both plan-making and decision taking is to ‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.’ As Long Hanborough is the only settlement that has been designated as a Service Centre that has a train station in West Oxfordshire, apart from Charlbury, which is located in the Cotswolds AONB and where development is therefore restricted, it is the only location where there is the opportunity to locate significant development where the future residents would be able to travel by rail without first undertaking a journey by car. For these reasons it is considered that policy OS2, which would only allow limited development in Long Hanborough, does not accord with the NPPF’s principle of supporting sustainable development (paragraph 14) or the Core Planning Principle of actively managing patterns of growth to make the fullest possible use of public transport (paragraph 17). For these reasons it is considered that policy OS2 is unsound as it is not consistent with national policy as stated in the NPPF and neither is it justified as it does not represent ‘the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.’
2.2 We continue to support the Council's settlement hierarchy in this respect. The Policy itself advises that:
"The rural service centres of Bampton, Burford and Charlbury are relatively constrained and are intended to accommodate a modest level of development of an appropriate type that will help to reinforce their existing service centre role. A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans."

2.3 We support the recognition that Bampton is a suitable location to accommodate additional development and that this is important to reinforce its existing service centre role. The Council's updated Settlement Sustainability Report (November 2016) which is published in support of the consultation classifies Bampton as being within the top eight most sustainable settlements in the District (unweighted).

2.4 Proposed paragraph 4.18c of the supporting text states that:
"The focus on development at the existing rural service centres of Bampton, Burford and Charlbury will be more limited. These service centres contain a good range of services and facilities but are constrained in terms of their capacity to accommodate further development. Bampton already has a large housing scheme of 160 homes under construction and site allocations are proposed in Burford and Charlbury to ensure the delivery of new housing on suitable available sites, including the delivery of much needed affordable housing."

2.5 Bampton falls within the Carterton Sub-Area of the Plan. Our comments in relation to the suitability of Bampton to accommodate additional development and the suitability of our client’s site at land at Aston Road/Mount Owen Road are discussed in relation to the proposed modifications to the Carterton Sub-Area below, and as such are not repeated here.

2.6 In summary the Council's recognition of the sustainability of Bampton is supported, however it is considered that the settlement is capable of accommodating additional development to help meet the Council’s objectively assessed need and that our client’s site at Aston Road/Mount Owen Road, Bampton should be allocated for 160 dwellings to help meet this requirement. The Council have provided no evidence to support their assertion that Bampton is constrained in terms of its capacity to accommodate additional development. Indeed the consultation responses received in respect of our client’s application for the proposed development of land at Aston Road/Mount Owen Road, Bampton confirm that there are no capacity issues that cannot be adequately mitigated by Section 106 contributions.

**Comment (plain text)**
- Eynsham
- West Oxfordshire Garden Village (at North Eynsham)
- Woodstock.

Broad support is offered in respect of Policy OS2 - Locating Development in the right places. The main service centres should be the subject of growth given they act as administrative, retail, employment and tourism hubs across the District.
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<th>Respondent ID</th>
<th>Respondent Organisation</th>
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<tr>
<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>-</td>
<td>1738</td>
<td>&gt; SECTION 4</td>
<td>Policy OS2 makes clear that a number of site allocations are proposed in the villages to ensure identified housing needs are met. As set out elsewhere in these representations, objections are lodged to a number of the sites that have been identified for allocation in the Plan. The development to be directed to rural service centres and villages should not be at the expense of the main service centres however and a balanced portfolio of sites across a wide range of sustainable settlements in the District as is broadly advocated in Policy OS2 provides for a justifiable and deliverable strategy for delivering housing. Policy OS2 continues to recognise Chipping Norton as a ‘Main Service Centre’ and CALA supports changes to the policy wording which maintains that Chipping Norton is a sustainable location for growth to accommodate a &quot;significant proportion of new homes, jobs and supporting services&quot;.</td>
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<tr>
<td>MM739</td>
<td>The Church Commissioners for England</td>
<td>Miss Kateley</td>
<td></td>
<td>1757</td>
<td>&gt; SECTION 4</td>
<td>Introduction</td>
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<td>OVERALL STRATEGY</td>
<td>We write on behalf of our client the Church Commissioners for England (the Commissioners) which manages a well-diversified investment portfolio to support the Church’s work across the country and is a long-term landowner in the West Oxfordshire area. We understand that the Council are currently consulting on the proposed modification to the Submission Draft West Oxfordshire Local Plan Local Plan 2031 Consultation. The Submission Draft West Oxfordshire Local Plan Local Plan 2031 seeks to address the initial concerns raised by the inspector in December 2015 following the first Local Plan hearing which dealt with strategic matters. These concerns generally related to the overall housing requirement and deliverability of these sites. We recognise that in response West Oxfordshire has increased the total housing requirement to 15,950 homes, allocated new sites and increased the size of strategic sites. We submitted representations in relation to the following five sites located within West Oxfordshire on behalf of the Commissioners to the West Oxfordshire Call for Sites in February 2016:</td>
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<td>MAIN 16</td>
<td>- Land North of Bampton</td>
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<td>- Deanery Farm</td>
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<td>- Church Close</td>
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<td>- Land at Lower Farm Cottages</td>
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<td></td>
<td>- Ansells Farmyard</td>
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<td>All five sites are immediately available and are suitable for allocation. We understand these have not been included within the Submission Draft West Oxfordshire Local Plan Local Plan 2031 and instead there is a focus on larger allocations. Housing The Commissioners generally support MAIN 16 Policy OS2 which states, in relation to Bampton, that “further allocations may be made through Neighbourhood Plans” however it also recognises that a number of site...</td>
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</table>
allocations are proposed to ensure identified needs are met. It is unfortunate that as per MAIN 15 PARA 4.18c we understand that specifically for Bampton, this relies on one major site for 160 homes. Smaller sites should also be included.

Planning Practice Guidance (PPG) states that when undertaking a Housing and Economic Land Availability Assessment all types of sites should be considered, including vacant and derelict land and buildings (including disused agricultural buildings). Whilst the NPPF states that the supply of new homes can sometimes be best achieved through planning for larger scale development it also states that sites must be deliverable. Larger sites require significant investment in infrastructure and take longer to develop.

Smaller sites on the other hand offer a number of benefits. Typically smaller sites require less infrastructure investment and can be quicker to develop and deliver whilst still providing a valuable contribution to the Council’s 5 year land supply and housing targets.

The development of a mix of smaller sites and larger sites can also enable a mix of housing to be delivered in accordance with paragraph 50 of the NPPF which states that local planning authorities should plan for a mix of housing based on current and future trends. The development of smaller sites can offer a range of housing sizes, type’s tenure and range of housing in accordance with the local demand for current and future demographic trends. New developments on smaller sites can also be designed to be more in keeping with the character of the local area.

There are often fewer barriers to the delivery of housing on smaller sites where the requirement for remediation works and new infrastructure is often less than that of larger sites. The level of disruption is also in turn lower which can result in less opposition to new development. This combined with quicker building times allows a quicker turn around for delivery. The development of smaller sites will also help small and medium sized builders which will help with the Governments initiative to assist small and medium sized builders.

The EWLC notes with some concern that the first paragraph of this draft Policy has been amended so that new homes, jobs and supporting services will no longer be ‘primarily focused’ on the main service centres, but that ‘a significant proportion of the new homes, jobs and supporting services’ will be located in these towns.

As one of the rural service centres, we agree that there is need for development in Burford and that the town should make a substantial contribution to the identified housing need for the Burford-Charlbury sub-area of at least 1,000 homes (MAIN 24). Again, this should be seen as a minimum number and not an overall cap/target to be met.

Burford is in the saved adopted Local Plan a key location for development and has been proposed as such in the WOLP. This is supported by the West Oxfordshire Settlement Sustainability Report which is part of the evidence base for the Local Plan. The Sustainability Report both in its original guise and as updated in November 2016 identifies Burford as one of the most sustainable locations to accommodate growth in the District. Indeed, even among the Rural Service Centres, Burford enjoys particular sustainability credential with a secondary school located in the town and as a result of the towns employment and retail base.

In general level the emerging Local Plan considers the service centres to be entirely suitable for development because of their range of services and facilities. Growth of an appropriate scale is perceived as adding to the prosperity of the towns in the rural areas around them.
Specifically, therefore, BC1 of the WOLP2013 indicates that within the sub-area, "the focus of new development will be Burford and Charlbury" i.e the two towns.

The positive strategy for accommodating development at Burford set out in the emerging WOLP 2031 to date was also explicitly linked to the Town Council's aspiration "to see an increase in the housing stock to provide some affordable housing to enable younger families to live in the town, secure the future of the primary school and increase the supply of key workers" (para 9.6.26). New housing in Burford is therefore an important planning objective to be realised through the Local Plan. Main modifications 15 and 16 appear to suggest some downplaying of the role of the town by suggesting that the focus of development at Burford will be more limited (para 4.18c) and that development should be modest (Policy OS2).

This is inconsistent with the sustainability of town and with the wider strategy for the Burford-Charlbury Sub-area - where the number of dwellings to be accommodated has quite correctly increased - to 1000 new dwellings (at least).

The support of the Town Council for proposals, other than that allocated in the Local Plan to the east of Burford (and notwithstanding the broad objections to that site), indicates that there are other opportunities in the town that will bring local benefits as well as meet wider needs. In particular Hallam supports the allocation of SHELA site 146 in the SHELA (land to the west of Shilton Road) provides opportunities for sustainable development.

Reference therefore to the focus of development at Burford being more limited should therefore be removed from the suggested para 4.16c in MM15. Moreover the wording of the policy in OS2 as proposed to be modified should revert to that in the previous version of the plan insofar as it addresses Burford i.e. the rural service centre of Burford (with such others as may be appropriate) should be "considered to be suitable for development of an appropriate scale and type that would reinforce their service centre role".

MM16 also refers to the allocation of sites within the rural service centres. Notwithstanding Hallam's objections to the sites identified it is important that the Plan adopts a positive approach and continues to set out the need for additional sustainable sites to come forward "within or on the edge of these service centres" - as had previously been explicitly set out in OS2 before it was proposed to be modified. Explicit reference should be added to the MM15 such that it is clear that ongoing opportunities on the edges of such settlements should continue to be supported as being necessary to deliver the overall housing strategy and the other objectives of the Plan. MM15 should be modified accordingly.

In the absence of such amendments this section of the plan is not positively prepared in promoting opportunities for sustainable development nor justified in terms of the evidence base.

Eynsham Garden Village

We do not believe that the Garden Village proposal at Eynsham is an appropriate measure for delivering the unmet need for Oxford. It is based on an ambitious timescale for delivery and given that the Government's announcement for the results of Garden Village proposals has not yet been announced (MAIN 17 references an application for funding), it is unclear how and whether the council will be able to deliver the scheme if the site is not selected of the Locally-led Garden Villages. The anticipated delivery numbers in the bid document are also unrealistic. It would be more appropriate to deal with the objectively assessed need and allocate development to settlements that can deliver homes across the plan period in a more effective manner. MAIN 3, 9, 15 16, 17, 23, 24 and 27 should be reconsidered and amended accordingly.
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<tr>
<td>MM747</td>
<td>Dijksman Planning</td>
<td>Ken Dijksman</td>
<td>Mr</td>
<td>Dijksman</td>
<td>1802</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>In relation to General Principles - the phrase 'having regard to the potential cumulative impact of development in the locality' is ineffective, legally vague and unsound as a policy. It provides no clear guidance as to what this might mean. It would I fear provide objectors with an easy and vague notion that a particular development is unacceptable purely because there has been 'too much' in that village or town. Whilst cumulative impact can be measured or assessed in relation to highways impact in terms of subjective issues such as village character this provides a hopelessly unpredictable and open ended reason for refusal based. As such this should be either removed (my preference) or directed towards objectively quantifiable cumulative matters such as traffic impact.</td>
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<tr>
<td>MM746</td>
<td>Hallam Land Management</td>
<td>Hallam Land Management</td>
<td>-</td>
<td>Hallam Land Management</td>
<td>1836</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>For the reasons outlined above in relation to MAIN 13-15, objection is raised to Policy OS2 which fails to identify Middle Barton as a Rural Service Centre suitable for accommodating a modest level of development. The provision for only 'limited' development in other villages is also too restrictive. Provision should be made for modest growth in selected rural settlements outside the AONB which have the potential to facilitate the delivery of the overall housing requirement and to make an early contribution to the five year housing land supply and redressing the backlog in housing delivery in the plan period to date.</td>
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<tr>
<td>MM754</td>
<td>Persimmon Homes Wessex</td>
<td>Claire Hambleton Persimmon Homes Wessex</td>
<td>Ms</td>
<td>Hambleton</td>
<td>1889</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>The consortium supports that a significant proportion of new homes, job and supporting services will be focused within and on the edge of the main service centres including Witney. Witney is a sustainable settlement and the principal Main Service Centre within the District offering a wide range of amenities, shops, services, employment and schools. Additional growth at this settlement will benefit from Witney's sustainable credentials.</td>
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<tr>
<td>MM759</td>
<td>Lincoln College</td>
<td>Lincoln College</td>
<td>-</td>
<td>Lincoln College</td>
<td>1946</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>We note the proposed modification and welcome the more permissive approach to new housing in villages. The text confirms development will be permitted on undeveloped sites adjacent to villages so far as development is necessary to meet housing needs. We understand this to permit suitable sites which are not allocated in the Plan (or any following document) that lie adjacent to villages. We welcome this approach, however clear wording should be included to confirm the permissive stance to avoid ambiguity and ensure the policy is applied in a positive manner. In essence that the presumption is that homes to meet housing need should be permitted on sites adjoining villages and proposals should only be refused where they give rise to discernible harm, on the planning balance. The permissive policy is fundamental to achieving suggested levels of windfall development; therefore any uncertainty undermines the deliverability of the planned housing. It is also necessary given the sea-change from previous WODC policy. The plan correctly acknowledges that previously developed land is a diminishing resource in the district; therefore a more permissive approach to village-edge sites is essential if windfall delivery is to be maintained.</td>
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<tr>
<td>MM761</td>
<td>R Jonas</td>
<td>Mr</td>
<td>Jonas</td>
<td>1971</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>The supporting text to Policy OS2 (Paragraph 4.17) notes that: 'Not all growth can or indeed should go to Witney, Carterton and Chipping Norton however, and there is a need for development elsewhere to help meet the unmet housing needs of Oxford City, to spread the potential benefits of growth and help sustain the more rural parts of the District.' This statement is fully supported. However, we recommend that Main Modification 16 to the Local Plan is...</td>
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<td>MM762</td>
<td>Oxford University and Colleges</td>
<td>Oxford University and Colleges</td>
<td>-</td>
<td>Oxford University and Colleges</td>
<td>1989</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>further amended to remove the reference to 'limited development' in villages. This would ensure that Policy OS2 is consistent with the approach set out in Policy H2 – Delivery of New Homes, and could enable more development to come forward in the villages. The first sentence of the sixth paragraph of Policy OS2 should be amended to read: 'The villages are suitable for development which respects the village character and local distinctiveness and would help maintain the vitality of these communities, where the proposed development is necessary to meet identified housing needs.' This amendment would also ensure that Policy OS2 and the Plan’s spatial strategy complies with Paragraph 55 of the NPPF, which states that: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.' Stanton Harcourt and Sutton are identified as a village in the Local Plan. There is a primary school, a church, a public house and a shop in the village. Development of my client’s site would assist in ensuring the continuing vitality and viability of these facilities.</td>
</tr>
<tr>
<td>MM764</td>
<td>Oxford University and Colleges</td>
<td>N. Potter</td>
<td>Unknown</td>
<td>Potter</td>
<td>1976</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>Main Modification 16 and 24 Our client supports the Council’s approach to locating development in the right places. Charlbury is identified as a Rural Service Centre and the Main modification identifies that it should provide for a modest level of development appropriate to support their roles as rural service centre. Our client supports the Council’s ambition to deliver a greater quantum of development in the District. It is noted that the plan aims to deliver 13,200 homes over the period 2011-2031 with a further 2750 homes to meet Oxford’s unmet need. As above, this proposed level of housing delivery in the District should not be considered an absolute maximum, but instead should be viewed as a minimum target to assist in delivery of identified housing requirements. It is agreed that provision of new housing should be made in each sub-area at appropriate village locations in line with relevant policies of the Plan. The revision to this policy, in order to identify the additional housing delivery requirement across the District is, in principle, supported. The identification that the figures in the policy are not to be considered a ‘maximum ceiling to development’ is supported as being inline with the NPPF.</td>
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Whilst the University & Colleges do not wish to comment generally on site specific matters, it is essential that the housing provision identified in the Local Plan to meet the needs of Oxford should be located so as to be easily accessible by sustainable transport from the City. The economic success of Oxford, and the preference for employees to find a home close to their place of work, are key factors in generating the level of housing need that Oxford experiences. It is likely therefore that the greater proportion of residents living in the Oxford related component of the housing that the Local Plan identifies, such as the Eynsham Garden Village, will have their place of work in Oxford. The 2011 Census illustrates the scale of in-commuting to Oxford from the adjoining authorities and elsewhere. Some 114,000 jobs are located within the administrative area of Oxford – representing... |
approximately one third of the total jobs in the Oxfordshire economy. Some 46% of those working in Oxford, some 45,950 people, commute into the city everyday from elsewhere. In West Oxfordshire this relationship is apparent in the high proportion of travel to work journeys from Witney along the A40 corridor. When undertaken using single occupancy vehicles, this level of commuting causes traffic congestion on the key routes into Oxford harming the local economy through delayed and unreliable journey times and increased transport emissions of air pollutants and carbon. Traffic congestion on these key routes also risks diminishing the benefit of providing additional housing in adjoining districts if that housing resource is not easily accessible from the City and generates unsustainable commuting patterns.

The University & Colleges note that Oxfordshire County Council launched its most recent consultation on the proposed £35m, LGF financed ‘A40 Eynsham Park and Ride and Bus Lane Scheme’ on the 1st December 2016. The consultation document does not specifically identify the Garden Village proposal, albeit the location of the Park & Ride is the same as that shown in the ‘West Oxfordshire Garden Village Expression of Interest’. It therefore needs to be demonstrated how the Garden Village will interact with the proposed new infrastructure and whether this is sufficient to ensure that there is adequate transport capacity to facilitate the anticipated level of commuting and other journeys from the Garden Village into Oxford and vice versa by sustainable transport i.e. Park & Ride, local bus services and cycling. It is therefore requested that 4.18a is amended so that it makes reference to the delivery of the A40 Eynsham Park & Ride and Bus Lane Scheme to ensure that adequate transport capacity exists in this key corridor to create an effective sustainable transport link between Eynsham and Oxford whereby the new trips generated by the Eynsham Garden Village proposal towards Oxford can be undertaken by mass transit, car-sharing and cycling.

This representation is made in respect of the sustainable settlement of Ascott under Wychwood, which is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text.

L&P objects to Main Modifications 15, 16, 27, 30 and 172 of the current consultation, as set out below.

Main Modification 16 relates to Policy OS2 – Locating Development in the Right Places. We agree with the general strategy which is clear in its justification of allocations in the main and rural service centres. However, the policy as amended lacks clarity in justifying the Council’s choice of allocations in the villages.

We suggest that the part of the policy referring to the villages is amended. The part which lack justification currently reads: A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans.

Savills has been instructed by Rivar Ltd to submit written representations to the West Oxfordshire Local Plan 2031 Proposed Main Modifications document. These representations are made in respect of land at Marriott Close, Wootton-by-Woodstock.

The site at Marriott Close, Wootton-by-Woodstock comprises greenfield land to the west of existing built development. The existing development adjacent to the site is located outside of the main built up area of the village. Notwithstanding the site is well located to the village edge and represents a logical extension to
The Sustainability Appraisal (SA): The Submission Local Plan only included a proposed housing requirement of 10,500 homes between 2011 and 2031, amounting to 525 new units per year. The plan sought to address only the housing need arising in the district of West Oxfordshire. Although it was acknowledged additional housing was likely to be required to assist in meeting the housing needs of Oxford City no provision was made in the document.

The examination of the Local Plan is presently suspended as the Inspector confirmed the Submission Plan was unsound as it failed to address the objectively assessed housing need; the Council now seeks to address this. Modifications proposed increase housing provision to 13,200 to provide for West Oxfordshire's need, a further 2,750 homes are also proposed to serve Oxford City. The revised housing provision is some 5,450 units higher than that proposed in the Submission Plan and remains to be delivered over the same plan period. In order to meet the increased figure 'Strategic Development Areas' are now proposed. The introduction of these substantial new sites in an area previously proposed for only limited development is a considerable deviation from the spatial strategy of the submission plan proposed. The inclusion of homes to satisfy Oxford's need is also a significant deviation in spatial strategy from that submitted which solely looked to serve the rural district of West Oxfordshire.

A development strategy involving a new settlement has been subject to SA; the option was 'scoped out' of the previous assessment as it was not considered to represent a reasonable option. As the Submission Plan did not include any provision for Oxford no SA was undertaken as to a spatial strategy which looked to serve two housing areas (West Oxfordshire and Oxford City).

The modified Plan amounts to a fundamentally different document to that submitted for examination both in the level of development and the spatial approach. Despite this the changes are dealt with in the SA as an "addendum", rather than fresh consideration being given to the most appropriate options for the distribution of housing.

The modifications proposed are crude additions to a predetermined strategy, rather than choices informed by a full and transparent assessment of all reasonable alternatives. We believe the SA to be deficient; therefore the Plan which follows from it cannot be sound.

Even if it were appropriate to consider the modifications through an SA addendum we believe the addendum
Itself to be incorrect. The Inspector confirmed in his Interim Findings (INO16) that any new site allocation must be informed by Sustainability Appraisal including assessment against reasonable alternatives. The published SA addendum solely considers two new strategic development sites adjoining Eynsham, rather than seeking to compare any reasonable alternatives.

Those sites closer to Oxford were dismissed out of hand due to Green Belt constraints, while those to the west were dismissed as being too distant from the city. The purpose of the SA is to enable a transparent and balanced assessment of alternative options against sustainability criteria, allowing a judgement to be made. For example a site closer to Oxford would benefit from physical proximity, but present challenges with regard to green belt impacts; a proper SA allows a balanced judgement to be made in a transparent manner offering sound foundations for the plan making process.

The SA does not consider all reasonable alternative options, merely the impacts of the Council’s pre-selected sites. This approach pre-judges the outcomes of the SA, removes the robustness and transparency of the plan making process and results in an unsound Plan.

Evidence base for proposed modifications: The proposed modifications must be informed by a robust and comprehensive evidence base. The modifications to the plan claim to be informed by an updated SHELAA; however this document was not published until 9th December 2016- some four weeks into the six week consultation period on the Local Plan. The sequence of publication suggests the evidence has been tailored to fit the plan, rather than informing the Council’s selection of the most sustainable options. It is clearly unacceptable that this consultation has allowed only a fortnight for inspection of the modifications and evidence base. The SHELAA is fundamental to understanding the soundness of the proposed changes, particularly as the document which accompanied the submitted plan was identified as deficient by the Inspector in his interim findings (INO16).

Failure to undertake proper consultation at this stage leaves any decision upon the plan vulnerable to legal challenge as the plan making process, including consultations have not adhered to proper process.

The limited assessment which it has been possible to undertake of the SHELAA suggests it has been treated as a means to limit development in the district, rather than explore the theoretical capacity of suitable development sites.

Numerous sites, including our client’s land in Ducklington (ref 342) are incorrectly classed as unsuitable for development as surmountable constraints are treated as fundamental barriers to development. For example site 342 (Ducklington) is considered unsuitable for development owing to landscape impacts; however no consideration appears to be afforded to potential mitigation. Furthermore no consideration is given to benefits which can arise from development; in the case of this site the use of playing fields, presently rented by the community, could be secured.

The restrictive approach applied through the SHELAA means it does not fulfil the purpose of the evidence document. It fails to provide the ‘menu of sites’ for assessment to ensure the most appropriate are chosen. This issue was identified by the Inspector in his initial findings (INO16) and does not appear to have been satisfactorily addressed; as a consequence the foundations do not exist upon which the Council can build a sound development plan.

This representation is made in respect of the sustainable settlement of Long Hanborough, which is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community.
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<tr>
<td>MM770</td>
<td>RJ Feilden Will Trust</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>MAIN 16</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>We note the proposed modification and welcome the more permissive approach to new housing in villages. The text confirms development will be permitted on undeveloped sites adjacent to villages so far as development is necessary to meet housing needs. We understand this to permit suitable sites which are not allocated in the Plan (or any following document) which are adjacent to villages. We welcome this approach, however clear wording should be included to confirm the permissive stance to avoid ambiguity ensure the policy is applied in a positive manner. In essence it should be clear that the presumption is that homes to meet housing need will be permitted on sites adjoining villages and proposals should only be refused where they give rise to discernible harm, having regard to the planning balance. The permissive policy is fundamental to achieving suggested levels of windfall development; therefore any uncertainty undermines deliverability of the planned housing. The plan correctly acknowledges that previously developed land is a diminishing resource in the district; therefore a more permissive approach to village-edge sites is essential if windfall delivery is to be maintained. We welcome the pragmatism in acknowledging the uncertainty of progress for neighbourhood plans. Planning applications preceding these plans should not therefore be seen as premature unless a neighbourhood plan has reached an advanced stage within the terms of the NPPF.</td>
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<tr>
<td>MM771</td>
<td>Stormport (UK) Ltd</td>
<td>Stormport (UK) Ltd</td>
<td>-</td>
<td>Stormport (UK) Ltd</td>
<td>MAIN 16</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>Stormport has the following comments to make on the modification. There is no clarity in the policy as to what constitutes a “modest” level of development and such vagueness is considered incompatible with other Plan objectives of delivering 660 dwellings per annum. Stormport support the policy insofar as it relates to the modified Policy H2 in that this will allow the delivery of housing on undeveloped land adjacent to the built-up areas of settlements. There is no requirement for such sites to come forward in either the Local Plan as an allocation or through the Neighbourhood Planning process. Stormport supports the proposed policy approach to villages, this is a positive and permissive framework, which when read in conjunction with Policy H2 allows for non-allocated sites to come forward for development.</td>
</tr>
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</table>
In terms of general principles, Stormport’s observations are as follows:

First Bullet point – There is a concern about the use of terms as “proportionate” and having to see development in the context of “potential cumulative impact.” The concern rests on how these are measured. It is a simple case of some form of numerical standard being applied or is it more a question of impact on facilities and services. If it is the former, there is no prescriptive formula for when something is no longer “proportionate” and given the Council’s ambitious housing target, there will be a need for a step change in housing delivery and levels of development, which could be seen, by some, as being disproportionate. In dealing with the cumulative impact test, again, this is a subjective issue and there is a concern about what the timeframe is for judging cumulative impact. As a result, such a test should be deleted.

This representation is made in respect of the sustainable settlement of Tackley, which is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text.

Main Modification 16 relates to Policy OS2 – Locating Development in the Right Places. We agree with the general strategy which is clear in its justification of allocations in the main and rural service centres. However, the policy as amended lacks clarity in justifying the Council’s choice of allocations in the villages.

We suggest that the part of the policy referring to the villages is amended. The part which lacks justification currently reads: A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans.

Main Modification 16 – Policy OS2

Policy OS2 is updated to reflect allocations made through the Proposed Modifications. Spitfire Homes supports that the ‘villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities’. This principle is in line with paragraph 55 of the NPPF. Nevertheless, we comment further below on the quantum of allocated sites and the benefit that directing further development to the village locations could have in respect of meeting housing targets.

Our client acknowledges the amendments to the Settlement Hierarchy at Table 4.1. Standlake continues to be appropriately classified as a ‘Village’ location, the sustainable credentials of which are reported by the Council’s Settlement Sustainability Report (SSR, November 2016). The SSR reports both an un-weighted and weighted score for the settlements assessed. In both scenarios the sustainable credentials of Standlake are recognised, with the settlement performing strongly and ranked highly within the ‘village’ tier (scoring 11 and 30 respectively).

Further, it is noted that the settlement of Standlake is relatively unconstrained by protective policy designations. The village lies outside of the Oxford Green Belt and is not subject to either Area of Outstanding Natural Beauty or Conservation Area constraints. The capacity of the settlement to deliver development, as demonstrated by Spitfire Homes land interest, aligns neatly with its sustainability credentials. In turn,
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<tr>
<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2078</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>This representation is made in respect of Land between Witney Road and High Street, Finstock. This site is Ref: 267 in the Strategic Housing Land Availability Assessment (SHLAA). The site lies outside the AONB. The owners of the site are willing to make the site available for housing development, as recorded in the SHLAA. We disagree with the assessment of suitability in the SHLAA for the reasons set out in Section 4.7. Finstock is in the 'village' tier of the Plan's Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. Our promoted site at Finstock would accord with the above criteria and we propose that the site is allocated to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text. Land &amp; Partners Ltd (L&amp;P) is a privately owned development company which has identified this site as a sustainable location for development. L&amp;P has reputation for engaging with the local community and securing high quality design, tailored to the local context. Negotiations are progressing with the landowners and the intention is to engage with residents and the Parish in early 2017. Objection to Main Modification 16 Main Modification 16 relates to Policy OS2 – Locating Development in the Right Places. We agree with the general strategy which is clear in its justification of allocations in the main and rural service centres. However, the policy (as proposed for modification) lacks clarity in justifying the Council's choice of allocations in the villages. We suggest amending the part of the policy referring to the village tier of the Settlement Hierarchy. The part which lack justification currently reads: A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans.</td>
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<tr>
<td>MM773</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>2079</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>In principle, we would agree with the amended Policy OS2 – Locating Development in the Right Places. Of particular interest is the section in relation to development within the villages. We agree that development should be distributed to the villages and should not rely solely on development to the Main Service Centres, however, we consider that the use of &quot;limited development&quot; restricts the level of growth which some villages can accommodate in assisting to meet the unmet housing needs of the District and those of Oxford City. For example, Hailey is a highly sustainable village, within proximity to a Main Service Centre, and has a level of services and facilities which make it suitable to sustain a reasonable level of growth at least equivalent to that either taken or proposed for similar villages in the District. We therefore consider that the site at Hailey offers a suitable extension to the village, in a sustainable location which will have minimal impact upon the surrounding landscape to the village, thereby maintaining the intrinsic character of the setting of the village itself. It is suggested that the word &quot;limited&quot; can be deleted without harm to the strategic aims and objectives of the policy. The final two sentences under this section appear to suggest further sites in such areas will come through</td>
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either via site allocations or through Neighbourhood Plans. This conflicts with the sub-area policies where it is clear that windfall developments also form a vital component of supply. Such sites would not be allocated in a plan. It is suggested that the final two sentences be deleted.

We also reference the Hailey Village Survey which confirmed that there was local support for housing needed in the rest of the parish (excluding North Witney) to allow the villages to grow. The response was a significant two thirds in favour of such housing – twice the number against it.

Savills has been instructed by Spitfire Homes to submit written representations to the West Oxfordshire Local Plan 2031 Proposed Main Modifications document. These representations are made in respect of land at Jubilee Lane, Milton under Wychwood.

The site off Jubilee Lane, Milton under Wychwood comprises greenfield land to the south of existing built development. The site is well located to the village edge and represents a logical extension to the village providing an opportunity to improve the character of the edge of the settlement. Planning history for the site is limited.

Spitfire Homes supports that the ‘villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities’. This principle is in line with the paragraph 55 of the NPPF. Our client agrees with the principle that the villages are suitable for development which respects the character and local distinctiveness, and would help to maintain the vitality of these communities. It is, nevertheless, considered that the use of ‘limited’ suggests a cap on the volume of development to the villages. It is noted that development which respects village character will generally be limited in nature, and so explicit reference to this is not deemed wholly necessary. Furthermore, the identification that the figures in the policy are not to be considered a ‘maximum ceiling to development’ is supported as being inline with the NPPF.

Furthermore, our client acknowledges the amendments to the Settlement Hierarchy at Table 4.1. Milton-under-Wychwood continues to be appropriately classified as a ‘Village’ location, the sustainable credentials of which are reported by the Council’s Settlement Sustainability Report (SSR, November 2016). The SSR reports both an unweighted and weighted score for the settlements assessed. In both scenarios the sustainable credentials of Milton-under Wychwood are recognised. Given the proximity of the settlement to Shipton-under-Wychwood it could be argued that the settlements could be considered to score more highly through their linked relationship (i.e. Shipton-under-Wychwood has a school and post office which are both within walking distance of Milton-under-Wychwood).

Policy OS2 sets out a hierarchy for the distribution of development across the District. A significant proportion of the planned growth is directed to the three Main Service Centres of Witney, Carterton and Chipping Norton. Additionally, within the main modification 16, and due to its connections to Oxford City, a new Rural Service Centre to the north of Eynsham, is also proposed to make a significant contribution towards meeting the District’s revised OAN figure. A further strategic allocation is proposed on the western edge of the village for a 1,000 dwellings, but does not form part of the ‘garden village’ related allocation. Beyond the three Main Service Centres, the focus of development is the Rural Service Centres of Bampton, Burford and Charlbury. Within Table 4.1 of the conjoined proposed modifications and submission draft of the emerging local plan, Bampton is retained as a Rural Service Centre. Its retention as such is wholly supported. Furthermore, the previous draft wording to the policy states that the majority of new homes will be focused on Witney, Carterton and Chipping Norton. Within the proposed modifications, it is clear that the focus will...
not solely be on Witney, Carterton and Chipping Norton but that the rural service centres of Bampton, Burford and Charlbury will also be a focus for future housing growth. The modification to this policy with regards to the distribution to rural service centres is also supported.

CALA are generally supportive of this policy, however there are aspects within the text of the policy which are unclear and in some cases appear to be contrary to the NPPF.

For example, Policy OS2 – Locating Development in the Right Places, which states:

“The rural service centres of Bampton, Burford and Charlbury are relatively constrained and are intended to accommodate a modest level of development of an appropriate type that will help to reinforce their existing service centre role. A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans.”

This paragraph clearly intends to limit development in Bampton given its apparent constraints and existing commitments such as land at New Road, Bampton. However, CALA contests that unlike a number of other settlements within the District such as Burford and Charlbury (i.e. the two other rural service centres, which are constrained by AONB) there are no constraints to the delivery of additional growth on the edge of the settlement. We believe land to the north of New Road, and between Station Road and Mount Owen Road, Bampton offers further potential without the significant constraint of AONB. Additional growth in this location will provide additional much needed affordable housing, the delivery of housing generally in the short term within the District (where there is currently a 5 year supply deficit) and further assist in helping to maintain the vitality of the settlement.

The reference to ‘constrained’ in the wording of the policy is said to be contrary to the Framework, not just in terms of environmental and landscape designations, but also in terms of the size of settlements where growth can actually occur. The NPPF (paragraphs 54 and 55) makes it clear that development in rural areas is part of the overall pattern of sustainable development. Indeed the NPPG is clear at Paragraph: 001 Reference ID: 50-001-20140306 that “A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities. Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless this can be supported by robust evidence.”

There is no reason to resist further growth in Bampton given its size and certainly not because of any environmental related constraints because they simply don’t exist.

The Proposed Modifications to the emerging Local Plan seeks to allocate a number of sites within the rural service centres in addition to emerging Neighbourhood Plans.

In the first instance, concern is raised over the ability for strategic and non-strategic allocations to support the necessary delivery of housing going forward and maintaining a continuous 5YHLS. Bampton, as mentioned earlier, is not constrained by environmental and landscape designations such as the AONB (which is the case in Burford and Charlbury where there is an intention to provide ‘major development’ within it). There is also a strong market demand to buy housing in Bampton. Building new homes in this location will therefore provide an almost (e.g. barring any future recessions) guaranteed steady flow of housing. This
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<td>MM778</td>
<td>Kier Group</td>
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<td>2106</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>Broad support is offered in respect of Policy OS2 - Locating Development in the right places. The main service centres should be the subject of growth given they act as administrative, retail, employment and tourism hubs across the District. The development to be directed to rural service centres and villages should not be at the expense of the main service centres however and a balanced portfolio of sites across a wide range of sustainable settlements in the District as is broadly advocated in Policy OS2 provides for a justifiable and deliverable strategy for delivering housing. Policy OS2 makes clear that a number of site allocations are proposed in the villages to ensure identified housing needs are met. As set out elsewhere in these representations, objections are lodged to a number of the sites that have been identified for allocation in the Plan.</td>
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<td>MM780</td>
<td>North A40 Land</td>
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<td>-</td>
<td>2123</td>
<td>&gt; SECTION 4 - OVERALL</td>
<td>Main Modification 15 introduces an amendment to the emerging Local Plan 2031 to reflect that the Eynsham sub-area is now proposed to accommodate more growth than originally envisaged in the submission draft.</td>
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<td>MM783</td>
<td>Consortium</td>
<td>Daniel Hatcher</td>
<td>Mr Hatcher</td>
<td>2137</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>Local Plan as a result of accommodating additional housing at Eynsham to meet Oxford City's unmet needs. As above, the Consortium generally supports the proposed modifications to Policy OS2, with particular and specific reference to the creation of a new rural service centre to be created to the north of Eynsham comprising a self-contained settlement based on 'garden village' principles.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2279</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>To aid clarity in decision-making, there should be greater consistency between Policy OS2 and Policy H2. Policy H2 makes it clear that housing will be permitted within or adjoining the built-up area of Main Service Centres (MRC), Rural Service Centres (RSC) and Villages, subject to other criteria. In this respect, Policy OS2 states that Villages are suitable for limited development and that a number of site allocations are proposed to ensure identified needs are met and that further allocations may be made through Neighbourhood Plans. In the context of Policy H2, it should however be made clear that other suitable sites in such settlements which otherwise accord with the policies of the Plan overall, will also come forward as windfall development through the Development Management process.</td>
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<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Blackwell</td>
<td>2303</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>Policy OS2 – development in the right places Development should take account of the availability of commercial bus services and the likelihood of improving these services. Burford, Charlbury and Bampton are located on commercial bus routes which are capable of enhancement to levels of service which are attractive for people travelling to work. Without population growth and consequent developer funding, the bus services in these localities could reduce in frequency and become less useful for these localities. Bus routes serve adjacent villages like beads on a string. To create an improved bus service, to the general benefit of local people, modest development would logically be allocated to each village along development corridors, for example: (Carterton)-Alvescot-Clanfield-Bampton-Aston-Standlake-Ducklington-(Witney) Burford-(Carterton)-Minster Lovell-(Witney)North Leigh-Long Hanborough-Bladon-(Woodstock) Charlbury-Stonesfield-Combe-(Woodstock) Chipping Norton – Over Norton – Great Rollright (then into Cherwell District). Proposed developments in the 'not connected' list of villages would normally be resisted due to the lack of sustainable travel options,</td>
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2.6. The landowners object to the de-classification of Lang Hanborough as a Rural service Centre and its re-categorisation as a Village. Such an approach is considered unsound, as it is not justified by a proportionate evidence base.

2.7. In objecting to this re-classification, it is necessary to highlight the guidance in paragraph 158, which requires a Local Plan to be based on an adequate, up-to-date, and relevant evidence base in making decisions about strategy and the allocation of development sites. In this instance, the Modifications is supported by a Settlement Sustainability Report, dated November 2016.

2.8. In this Report, footnote 1 on Page 2 makes it clear that Long Hanborough is reclassified as a village. However, there is no explanation as to the reason why this is and it is further undermined by the case that the Matrix of Services on page 15 shows the village scoring well against a number of assessment criteria (positive indicators) whilst at the same time not being subject to the more significant restraint indicators (e.g. AONB). Furthermore, in his Interim Findings on the Local Plan, the Inspector considered that the settlement
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<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Blackwell</td>
<td>2304</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>hierarchy to be justified, therefore, what evidence has the Council put forward to support such a change? 2.9. In reviewing the Cabinet Paper which accompanied the Proposed Modifications passage though the Council Committee process, paragraph 5.9 of the document makes reference to the reclassification of Long Hanborough and its replacement with the Garden Village. Given the above concerns about the deliverability of the Garden Village, it remains to be seen that the Council’s position that the declassification of Long Hanborough “avoids an over-concentration of rural service centres in this part of the District” is a sufficiently robust and supported by evidence. This apparent justification is not considered by the landowners to be sufficiently robust to support the modification to Table 4.1, and is therefore, unsound.</td>
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<td>MM791</td>
<td>Greenwich Lane Owners</td>
<td>Greenwich Lane Owners</td>
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<td>Greenwich Lane Owners</td>
<td>2316</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</td>
<td>18. MAIN16: We note the proposed modification and welcome the more permissive approach to new housing in villages. The text confirms development will be permitted on undeveloped sites adjacent to villages so far as development is necessary to meet housing needs. We understand this to permit suitable sites adjacent to villages which are not allocated in the Plan (or any following document). 19. We welcome this approach, however clear wording should be included to confirm the permissive stance</td>
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| MM792        | Alvescot Parish Council | Alvescot Parish Council | Mrs Hoad | 2320 | > SECTION 4 - OVERALL STRATEGY > MAIN 16 | to avoid ambiguity ensure the policy is applied in a positive manner. In essence that the presumption is that homes to meet housing need should be permitted on sites adjoining villages and proposals should only be refused where they give rise to discernible harm. The permissive policy is fundamental to achieving suggested levels of windfall development; therefore any uncertainty undermines the deliverability of the planned housing.  
20. The plan correctly acknowledges that previously developed land is a diminishing resource in the district; therefore a more permissive approach to village-edge sites is essential if windfall delivery is to be maintained.  
21. We welcome the pragmatism in acknowledging the uncertainty of progress for neighbourhood plans. Planning applications preceding these plans should not therefore be seen as premature unless a neighbourhood plan has reached an advanced stage within the terms of the NPPF. |
| MM61         | NP                      | Mr Pearce | 537 | > SECTION 4 - OVERALL STRATEGY > MAIN 16 | MAIN 16, Policy OS2 Locating development in the right places  
After consultation with residents to create a Community-Led Plan for the village, the Parish Council has a policy of supporting development which is appropriate in scale and character, and which in particular, provides affordable housing and enables residents to continue living in the village despite age or disability. This seems generally consistent with the Policy proposed for small villages. However, now included among the General Principals (page 20) is the sensible requirement that no development should be at risk of flooding or likely to increase the risk of flooding elsewhere. The Parish Council will oppose any development either in the village or surrounding settlements which increases the load on the sewerage system and pumping station at Lower End, which are already inadequate and prone to cause overflows, until this problem is resolved. |
| MM328        | Russ Canning | Mr Canning | 606 | > SECTION 4 - OVERALL STRATEGY > MAIN 16 | Not Sound  
The proposed site for a “Garden Village” at Eynsham North flagrantly flies in the face of this policy. The proposed site, whilst not within the Oxford Green Belt or Cotswolds AONB, fulfills a critical landscape function in linking these two areas and maintaining a continuous Green Corridor and gateway into the Cotswolds traveling west and a non-suburban green approach into the city of Oxford traveling east. |
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| MM363         | Oxford City Council     | Ms              | Dell             | 684        | > SECTION 4 - OVERALL STRATEGY > MAIN 16 | Land and New Allocations
It does appear that the new strategic site allocations (West of Eynsham & the 'Garden City' Eynsham) together with increasing the capacity on the three existing strategic allocations provides sufficient land in principle to meet their SHMA targets and make a significant contribution to Oxford’s ‘unmet’ housing need.

The two new strategic allocations in Eynsham (Garden Village and West of Eynsham) have emerged through the joint working arrangements and given their strategic spatial location appear to be best placed to help

The land to the north of the A40 with its gently undulating topography, irregular, small scale grazing fields, hedgerows and copses is of demonstrably higher landscape value and sensitivity to change than that to the south of the A40.

The area also falls within the boundaries of the Wychwood Forest Project and as such any development should be modest in scale e.g. limited expansion of existing settlements and not encompass a 2,200 house new settlement.

Whilst the impacts upon the acknowledged assets of both the rural landscape and its bio-diversity will not be capable of mitigation, neither will the severe impact upon the Listed Buildings of City Farm whose setting would be destroyed by a “Garden Village in this location.

The West Oxfordshire Strategic Housing Land Availability Assessment [SHELAA] of June 2014 concluded that the land north of the A40, currently proposed as the site of a “Garden Village” was “Not suitable as a consequence of noise impact and the unacceptable impact of development on the countryside “…

The only change that has taken place during the intervening 2 years is an increase in both traffic and noise levels on the A40. The proposed siting of a “Garden Village” north of the A40 is, therefore, both contrary to WODC’s own report and is totally at odds with this policy.

Main 16 Policy OS2 [General Principles]
Not Sound

These principles state that all development should “(1) Not involve the loss of an area of open space or any other feature that makes an important contribution to the character or appearance of the Area.”

It is clear that the construction of Eynsham North would have a devastating impact upon the high quality rural landscape, local residents and passing motorists’ views of that landscape, the rich bio-diversity of the area and the listed buildings of City Farm.

All these features of acknowledged importance, both together and individually, make a significant contribution to the character and appearance of the area. The proposed “Garden Village” therefore is fundamentally at odds with this policy.

Paragraph 9.5.40u
Not Sound
Please refer to comment regarding Paragraph 4.2 above.
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<td>contribute to meeting Oxford’s ‘unmet’ housing need.</td>
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<td>Support: The City Council therefore support in principle:</td>
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<td>* Main Mod 16 Policy O2 ‘Locating development in the right places’, which identifies Eynsham and the Garden Village as the most appropriate allocations to help to meet Oxford’s unmet housing need</td>
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<td>* Main Mod 23, and in particular paragraphs 5.20 and 5.21 which also confirm the importance of these two principal sites.</td>
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<td>* Main Mod 27 which then goes on to identify these sites as ‘strategic development areas’ in para 5.29 and 5.34d and</td>
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<td>* Main Mod 30 Policy H2 ‘Delivery of new homes’ which incorporates “further 2,750 homes in the period 2021 – 2031 to meet Oxford City’s housing needs.”</td>
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<td>Objection: Given Oxford’s acute housing shortage the City Council would seek some assurance that the deliverability of the two new strategic allocations will be prioritised over and above increasing the capacity on the three existing strategic site allocations. Otherwise there could be further delay in meeting the city’s urgent housing requirements, particularly bearing in mind this Plan only goes to 2031 and development will not start until 2021.</td>
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<td>The delivery of this housing is urgently needed to meet Oxford’s unmet housing need and therefore the City Council would expect an Area Action Plan for Eynsham and the Garden Village to be commenced at the earliest opportunity to take forward the delivery of these ‘Strategic Development Areas’.</td>
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<th>MM374</th>
<th>Carillion Capita</th>
<th>Jeremy Flawn</th>
<th>Mr Flawn</th>
<th>720</th>
<th>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</th>
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<td>OCC P&amp;F supports the modified policy text and the recognition that a significant proportion of new homes, jobs and supporting services will be focused within and on the edge of the main service centres, which include Chipping Norton.</td>
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<td>Furthermore, OCC P&amp;F supports the modified policy in recognizing that due to the size of the settlement and its proximity and connections to Oxford City, Eynsham will also make a significant contribution towards meeting identified housing needs with a strategic urban extension to be provided to the west of the village.</td>
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<td>Finally OCC P&amp;F supports the creation of a new rural service centre to the north of Eynsham based upon ‘garden village’ principles.</td>
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<th>MM375</th>
<th>Charlbury Town Council</th>
<th>Charlbury Town Council Mr S R Clarke</th>
<th>Mr Clarke</th>
<th>729</th>
<th>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 16</th>
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<td>Reason:</td>
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<td>We welcome the recognition that development in rural service centres including Charlbury will by necessity be “relatively constrained”. We also welcome the emphasis on site allocations to meet identified local needs.</td>
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<td>However, we are concerned that this policy does not specifically recognise the significance of the Cotswold AONB and the “great weight” that should be given to “conserving landscape and scenic beauty” in such areas as set down in paragraph 115 of the National Planning Policy Framework (NPPF) - especially given the marketing of the area as the “Oxfordshire Cotswolds” and the percentage of the area within the AONB. Given the explicitly stated requirement that development in the Green Belt must “comply with national policies for the Green Belt”, and the references throughout the document to Woodstock’s “important historic character and the setting of Blenheim Palace”, we believe a similar statement for the AONB is more than justified.</td>
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Stagecoach supports the rewritten policy.

The evidence base makes clear that Eynsham and its immediate hinterland affords the best opportunities to meet the housing needs of Oxford. Locations nearer to Oxford would tend to be more consistent to reducing the need travel. However it is clear no such opportunities are available within the Green Belt that are not heavily and fundamentally constrained, by a range of landscape, environmental, heritage or engineering factors.

The development strategy selected to help meet the City of Oxford's unmet needs, takes the best possible advantage of the opportunities for sustainable transport. The “A40 Science Vale Transit Phase 1” Project is close to being implemented with funding committed, and this will provide bus lanes on the A40 from a new Park and Ride site north of the A40 to Dukes Cut, where a bus gate will be provided; and westbound on the approach to the B4449 Eynsham Roundabout. This will reduce bus journey times, making them considerably more competitive compared with door-to-door journey times by car to the major destinations within Oxford City. At least as important, it will make journey times greatly more predictable; and services will be much more reliable.

It is proposed that this scheme will be followed by a “phase 2” project that will complete westbound bus lanes from Dukes Cut to Eynsham. These schemes will also be linked seamlessly with bus priority on the A40 on approach to Wolvercote to be provided with the implementation of the proposals for employment-led development at Oxford Northern Gateway.

Stagecoach is intending, as a response to the opportunities presented by Science Transit phase 1, to offer direct regular services from Carterton, Witney and Eynsham Park and Ride to Oxford’s Eastern Arc, and, within that wider area, the Hospitals and Brookes University in particular. The frequency of the service between Eynsham Park and Ride and Oxford via the A40 is anticipated to increase to at least 4 buses/hour, with more frequent services likely to be provided at peak times. These services will all be available at the Park and Ride, within reasonable walking distance and good cycling distance of the proposed development West of Eynsham, and from the New Garden Village North of Eynsham. Design of the P+R site, should maximise such connectivity, and also provide scope for buses serving the Park and Ride to continue on to penetrate the developments themselves.

Once Phase 2 is implemented, it is highly likely that more frequent service will be implemented, with extensions further towards Cowley, in line with the Oxford Transport Strategy. The exact response will be subject to a great extent to the implementation of measures to facilitate significantly more efficient bus operation within the City being implemented as proposed in the Oxford Transport Strategy, including that arising from the committed Access to Headington Project which is now under construction.

Stagecoach recognises that Woodstock also has capacity to meet housing needs sustainably, being a settlement that offers a range of local shops and services, including a secondary school. It also benefits from a range of regular direct public transport connections to existing and likely future employment growth on a strategic scale, provided or envisaged at Oxford Airport/Langford Lane, Begbroke, and Oxford Northern Gateway.

Stagecoach has announced a considerable enhancement of the bus service offer to Woodstock, in the form of new service 7, which will serve the whole town and run every 30 minutes to Oxford Parkway and City
| Comment (plain text)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Respondent ID | Respondent Organisation | Respondent Name | Respondent Title | Respondent Surname | Comment ID | Document Full Path |
Accordingly where the presumption in favour of sustainable development does not apply.

It is therefore recommended that Footnote 9 of the NPPF is stated within Policy OS1

"For example, those policies relating to sites protected under...and/or designated as...an Area of Outstanding Natural Beauty,...".

As the Overall Strategy section sets the context for the rest of the plan the Board recommends that reference to Footnote 9 is included. This approach should also include OS2 Locating Development in the Right Places which currently allows for the allocation of development sites within the AONB. OS2 is specifically referenced in policy H2 Delivery of New Homes. It is therefore crucial that both OS1 and OS2 are fully compliant with the NPPF.

The NNPF makes specific reference to development in AONBs. Paragraph 115 affords 'great weight' to conserving landscape and scenic beauty in AONBs and Paragraph 116 advises that major developments in AONBs should only be permitted in 'exceptional circumstances'.

This advice was recently utilised in the Vale of the White Horse Local Plan 2031: Part 1 Inspectors Report (November 2016). As another Oxfordshire authority with an AONB the Vale is also required to help meet Oxford City's unmet housing need. Issue 5 (page 31 of the report) "Whether or not the plan sets out a soundly-based strategy for the South East Vale Sub-Area, including whether or not the housing allocations proposed in the North Wessex Downs AONB are soundly-based" is particularly relevant.

The Inspector concluded that two sites located within the AONB should be withdrawn given that the need for housing in the AONB had not been demonstrated and that the exceptional circumstances necessary for approval were unlikely to exist. The Board recommends the West Oxfordshire Local Plan adopts a similar approach to sites within the Cotswolds AONB.
3.4 Whilst we note that a wider dispersed option was tested through the SA, there does not appear to have been an option that looked specifically at dispersed growth option in the eastern part of the district, which could have considered For example, an alternative option to targeting growth towards the settlement of Eynsham could have been to consider additional growth spread across the villages to the Eynsham-Woodstock sub area of the District and perhaps areas to the east of Witney, Duckington, Hailey, Finstock, Stonfield and Charlbury. Dispersed growth across these settlements would appear to be a potential option to meet Oxford’s unmet needs.

3.5 ASL support the recognition that further allocations may need to be made through Neighbourhood Plans in relation to villages but note that should it become evident that the Local Plan is not delivering, there will need to be sufficient policies and triggers within this Local Plan to require an early review, as the burden to meet needs cannot simply be left to local communities.

Policy H1 – Amount and Distribution of Housing (MM21 to MM24)

3.6 Regarding MM21, we do not dispute the position that the level of growth needs to considered against associated impacts, but we are not convinced that ‘growth needs to be managed in order to prevent significant change to the intrinsic character of the District’ is the correct term to use here as the barometer to which impact will be considered. Indeed, the modified Plan proposes significant change to the character of some areas (i.e. Eynsham). The test has to be if the meeting needs would significantly and demonstrably outweigh the benefits, as set out at paragraph 14 of the NPPF.

3.7 With regard to the overall quantum of housing now being proposed as part of MM22, we can confirm that we support the evidence base conclusions on housing requirements, which have been placed within the Modified Policy H1 (MM24). ASL support the 15,950 dwelling requirement overall, which comprises of 13,200 homes for West Oxfordshire and 2,750 homes for Oxford’s unmet needs that are now enshrined in this policy.

3.8 ASL do not take specific issue with the proposed distribution of new homes. Indeed, we support the requirement for the Chipping Norton sub area at 2,400 new homes over the plan period and notwithstanding our points regarding statutory requirements in relation to the preparation of a Local Plan (as set out in Section 2), we do not take particular issue with the spatial distribution that is being proposed, we just do not feel such a major change can be enveloped into the current process without serious risk of by-passing key requirements of the law when preparing a Local Plan. Put simply, we thing the changes have gone a step to far to be incorporated in to this plan as modifications post submission of the plan.

3.9 The increased housing requirement within each of the districts sub-areas is set out in Table 1 (ATTACHED). The housing requirement for the District has gone up by 51%, which has then led to significant changes to the spatial distribution of development.

3.10 The Eynsham-Woodstock sub-area requires 243% more homes that originally envisaged within the Submission Draft Local Plan, which perfectly highlights the substantial change to the distribution of development that is now being promoted.

3.11 Chipping Norton’s requirement has also increased by 50% and as noted above we support this as it brings it more in line with requirements for the other three main towns (whilst noting Chipping Norton is the smallest of the three towns). However, as noted in Section 2, in proposing this increase in housing numbers for the settlement, the Council have only considered one option for delivering this number of new homes.
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| MM398        | Freeland Parish Council | Freeland Parish Council | Mrs | Smith | 863 | > SECTION 4 - OVERALL STRATEGY » MAIN 16 | Core Policy OS2 of the WODC Draft Local Plan also states that for small villages, hamlets and open countryside:  
"Development in the small villages, hamlets and open countryside will be limited to that which requires and is appropriate for a rural location and which respects the intrinsic character of the area."  
The Policy goes on to state that the General Principles for development will be:  
"All development will be located where:  
* it forms a logical complement to the existing scale and pattern of development and/or the character of the area;  
* it protects or enhances the local landscape and the setting of the settlement/s;  
* it makes use of previously developed land where available, provided it is not of high environmental value (e.g. ecology) and the loss of any existing use would not conflict with other policies of this plan;  
* it does not involve the loss of an area of open space or any other feature that makes an important contribution to the character or appearance of the area;  
* it can be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities."

Freeland Councillors do not feel that these policy principles are being met with the proposed Garden Village as a huge valuable open green space is being lost which makes an important contribution to the character and appearance of the approach to Freeland and the village as a whole. Whilst they recognise that some of the green space is being retained, if this application goes ahead there are real concerns that, in time, the rest of this area will be developed with even more houses, with the result that the current rural approach to Freeland will be lost. |
<p>| MM760        | North Leigh Parish Council | North Leigh Parish Council | Ms | Kern | 912 | &gt; SECTION 4 - OVERALL STRATEGY » MAIN 16 | We support the general principles of development restated in Main 16, but the North Witney proposal - whether 1000 or worse 1400 dwellings, fails on various counts to satisfy some of those key principles - it is not a logical complement to the existing scale and pattern of development and the character of the area, it has a potentially harmful effect on existing occupants and damages rather than enhances and protects the local landscape; it significantly increases the risk of flooding both from surface water and foul water drainage as the existing systems are known to be inadequate; it will generate significant additional traffic likely to rat run through North Leigh via the New Yatt Road which will link to the northern distributor road and if the West End Link Road is built yet more traffic from West Witney and beyond will be able to take the same short cuts and increase traffic flows in our village to an unacceptable level. In these respects the modifications are |</p>
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| MM425        | Carterton Construction | -              | Carterton Construction | 944        | > SECTION 4 - OVERALL STRATEGY > MAIN 16 | unsound and these elements legally non compliant.  
2.1 As set out in the supporting settlement hierarchy to the policy, after the three main service centres of Witney, Carterton and Chipping Norton, the next tier of settlements is the rural service centres comprised of:  
- Bampton  
- Burford  
- Charlbury  
- Eynsham  
- West Oxfordshire Garden Village (at North Eynsham)  
- Woodstock.  
2.2 We continue to support the Council’s settlement hierarchy in this respect. The Policy itself advises that:  
“The rural service centres of Bampton, Burford and Charlbury are relatively constrained and are intended to accommodate a modest level of development of an appropriate type that will help to reinforce their existing service centre role. A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans.”  
2.3 We support the recognition that Burford is a suitable location to accommodate additional development and that this is important to reinforce its existing service centre role. The Council’s updated Settlement Sustainability Report (November 2016) which is published in support of the consultation classifies Bampton as being within the top six most sustainable settlements in the District (weighted and unweighted).  
2.4 Proposed paragraph 4.18c of the supporting text states that:  
“The focus on development at the existing rural service centres of Bampton, Burford and Charlbury will be more limited. These service centres contain a good range of services and facilities but are constrained in terms of their capacity to accommodate further development. Bampton already has a large housing scheme of 160 homes under construction and site allocations are proposed in Burford and Charlbury to ensure the delivery of new housing on suitable available sites, including the delivery of much needed affordable housing.”  
2.5 Burford falls within the Burford-Charlbury Sub-Area of the Plan. Our comments in relation to the suitability of Burford to accommodate additional development and the suitability of our client’s site to the east of Burford are discussed in relation to the proposed modifications to the Burford-Charlbury Sub-Area below, and as such are not repeated here.  
2.6 In summary the Council’s recognition of the sustainability of Burford is supported, however it is considered that the settlement is capable of accommodating additional development to help meet the Council’s objectively assessed need and our client considers its wider landholding to the east of Burford should be allocated to meet these requirements. We consider this matter in greater detail in respect of Main Modification...
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>147</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 17</td>
<td>200 below and as such do not repeat this here.</td>
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<td>MM746</td>
<td>Hallam Land Management</td>
<td>Hallam Land Management</td>
<td>-</td>
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<td>1805</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 17</td>
<td>Eynsham Garden Village: We do not believe that the Garden Village proposal at Eynsham is an appropriate measure for delivering the unmet need for Oxford. It is based on an ambitious timescale for delivery and given that the Government’s announcement for the results of Garden Village proposals has not yet been announced (MAIN 17 references an application for funding), it is unclear how and whether the council will be able to deliver the scheme if the site is not selected of the Locally-led Garden Villages. The anticipated delivery numbers in the bid document are also unrealistic. It would be more appropriate to deal with the objectively assessed need and locate development to settlements that can deliver homes across the plan period in a more effective manner. MAIN 3, 9, 15, 16, 17, 23, 24 and 27 should be reconsidered and amended accordingly.</td>
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<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
<td>-</td>
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<td>1852</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 17</td>
<td>MAIN 4 Para 2.9 states: “Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of ‘unmet’ housing need that Oxford City are unable to provide for within their own administrative boundary.” We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification. We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1, 2, 13, 14, 15, 17, 23, 24, 27.</td>
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<tr>
<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>-</td>
<td>-</td>
<td>2144</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 17</td>
<td>This main modification is welcomed and supported to reflect changes to national policy introduced since the submission draft Local Plan was prepared.</td>
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<tr>
<td>MM95</td>
<td>GMM</td>
<td>Miss Mangley</td>
<td>247</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 17</td>
<td>You are focussing on the efficiency and greenness of the houses but not the significant increased numbers of cars in Chipping Norton, travel across the town and commuting out of town to work and other activities. Both house building and car numbers go hand in hand and green houses cannot be applauded when so many more cars will be on the road in an area that is already an AQMA.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>538</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 17</td>
<td>MAIN 17, Para 4.27a Not sound Given that West Oxfordshire is in an area of ‘demonstrable water stress’, and planned growth is forecast to</td>
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<td>MM745</td>
<td>Gladman Developments Limited</td>
<td>Richard House (Gladman)</td>
<td>Mr</td>
<td>House</td>
<td>1789</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 18</td>
<td>lead to ‘a supply demand deficit in the next ten years’, it is not really good enough just to say that ‘there is strong justification for West Oxfordshire to have a water efficiency policy in line with the Building Regulations optional requirement of 110l/h/d’. There is still going to be a lot more water used than before (eg, by 4,000 new residents in the new Garden Village and other upstream developments) and a greater level of water stress, isn’t there? What is going to be done about that?</td>
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<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>-</td>
<td></td>
<td>2145</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 18</td>
<td>The additional clarity in relation to solar gain and solar heating is welcomed. However, we would suggest that both this bullet point and the new requirement for development to achieve the optional building regulation standard on water efficiency should be caveated by including the words “where feasible” to allow for sufficient flexibility within the policy wording.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2280</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 18</td>
<td>Policy OSS – supporting infrastructure Developer Contributions will also be sought towards improved Public Transport provision, based on pump-priming additional journeys and service frequency through a pump-priming mechanism.</td>
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3.1 Main Modification 18 proposes a requirement for new development to achieve the optional building regulation standard in respect of water efficiency on the grounds that West Oxfordshire falls within an area of demonstrable water stress.

3.2 The PPG (PPG ID 56-014-20150327) states that all new homes already have to meet the mandatory national standard in the Building Regulations of 125 litres/person/day. Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations requirement of 110 litres/person/day. Gladman does not consider that the Council has produced any robust evidence for seeking a requirement above and beyond the building regulations target of 125 litres/person/day. No consideration has been given as to the impact of seeking this higher level or whether this is actually achievable across the area; the impact on viability has not been appropriately assessed.

3.3 The West Oxfordshire Water Cycle Study: Phase 1 Scoping (2016) has been produced which does not consider financial implications. Gladman is aware that concerns about viability have already been expressed in relation to a number of strategic allocations in the Local Plan at earlier hearing sessions. The PGG (Ref ID: 10-005-20140306) is clear when it states:

"Local Plans and neighbourhood plans should be based on a clear and deliverable vision of the area. Viability assessment should be considered as a tool that can assist with the development of plans and plan policies. It should not compromise the quality of development but should ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable.

Development of plan policies should be iterative – with draft policies tested against evidence of the likely ability of the market to deliver the plan’s policies, and revised as part of a dynamic process.

Evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability. Greater detail may be necessary in areas of known marginal viability or where the evidence suggests that viability might be an issue – for example in relation to policies for strategic sites which require high infrastructure investment."

3.4 The requirement proposed in the Policy will only serve to exacerbate viability concerns. This part of the Policy should therefore be removed.
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England Mr Small</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN19 for the addition of the references to the historic, architectural and landscape character of the locality and the Oxfordshire Historic Landscape Appraisal; the replacement of &quot;preserve&quot; with &quot;conserve&quot;; and the clarification that both designated and non-designated heritage assets will be conserved or enhanced, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>How are the rich wildlife and varied habitats, and Grade II listed buildings, going to be conserved and enhanced by the Garden Village?</td>
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon Mrs Marshall</td>
<td>CPRE supports the existing designation of the Shill Brook as a Conservation Target Area as noted in 9.3.27, 9.3.88 and 9.3.90, as it’s clearly an important and ecologically sensitive location in the sub-area. CPRE supports the planned enhancement, so that the natural environment and ecology in this area and adjacent Local Wildlife Sites and the SSSI is protected. In this regard, CPRE supports policies OS2 &amp; OS4 which seek to protect important landscape, conserve the natural environment and habitats of biodiversity value. This is not a new or revised point in the Draft Local Plan, but it does mean that the alternative option to the West of Carterton in 9.3.54-56 is not suitable, as the Shill Brook would be breached and the natural environment disturbed. The high cost of the infrastructure for this site would limit affordable housing provision. Also, this site is in prominent open countryside, unbounded on all 4 sides. The alternative options to the North are in open countryside too and so as above, REEMA should be the next priority for development in the town.</td>
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<td>MM735</td>
<td>Braemar Property Developments</td>
<td>- Braemar Property Developments</td>
<td>No specific objections are lodged in respect of Policy OS4 - High Quality Design. However, it is important for the purposes of development management in assessing planning applications and appeals that the test in the policy to conserve or enhance areas, buildings and features of historic, architectural and environmental significance should not be read as a requirement in all instances to provide enhancement. Instead the policy should be noted as requiring a neutral impact if policy is to be met.</td>
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| MM745        | Gladman Developments Limited| Richard House (Gladman) Mr House  | 4.1 Amended wording to Policy OS4 is proposed to "more clearly highlight the importance of historic, architectural and landscape character in relation to the design of new development and to ensure consistency with national policy in relation to the historic environment".  
4.2 Gladman considers that the proposed reference in the Policy to non-designated heritage assets and habitats of bio-diversity value is inconsistent with the NPPF. Paragraph 113 makes it clear that: "Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks."  
4.3 Similarly, Paragraphs 133 and 135 of the NPPF make it clear that the tests to be applied in the determination of planning applications will be different dependent upon whether the heritage asset(s) affected are designated or non-designated.  
4.4 Gladman considers that the proposed amended wording of Policy OS4 should be removed and the Policy wording should be amended to be consistent with the NPPF. |
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<td>MM762</td>
<td>N. Potter</td>
<td>Unknown Potter</td>
<td>Potter</td>
<td>1978</td>
<td>&gt; SECTION 4</td>
<td>OVERALL STRATEGY &gt; MAIN 19</td>
<td>The amendment to Policy OS4 ('high quality design') is supported insofar as it clarifies the expectations of the Local Planning Authority in respect of the design of any new development. Our client agrees with the rationale of modifying this policy to bring it in closer accordance with prevailing national policy guidance regarding development proposals which respect, contribute to, and where possible enhance the historic, architectural, and landscape character of a given locality.</td>
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| MM769        | Rivar Ltd               | Rivar Ltd                |                  | 2015              | > SECTION 4 | OVERALL STRATEGY > MAIN 19 | Savills has been instructed by Rivar Ltd to submit written representations to the West Oxfordshire Local Plan 2031 Proposed Main Modifications document. These representations are made in respect of land at Marriott Close, Woottton-by-Woodstock.  
The site at Marriott Close, Woottton-by-Woodstock comprises greenfield land to the west of existing built development. The existing development adjacent to the site is located outside of the main built up area of the village. Notwithstanding the site is well located to the village edge and represents a logical extension to the village. Planning history for the site is limited. Neighbouring land uses benefit from recent planning history for residential development at the adjoining site. The site has the benefit of positive previous pre-application advice relating to a similar proposal scheme sought from West Oxfordshire District Council in February 2015, and November 2016.  
Amendment to Policy OS4 ('high quality design') is supported insofar as it clarifies the expectations of the Local Planning Authority in respect of the design of any new development. Our client agrees with the rationale of modifying this policy to bring it in closer accordance with prevailing national policy guidance regarding development proposals which respect, contribute to, and where possible enhance the historic, architectural, and landscape character of a given locality. |
| MM772        | Spitfire Homes          | Spitfire Homes           |                  | 2093              | > SECTION 4 | OVERALL STRATEGY > MAIN 19 | Savills has been instructed by Spitfire Homes to submit written representations to the West Oxfordshire Local Plan 2031 Proposed Main Modifications document. These representations are made in respect of land at Jubilee Lane, Milton under Wychwood.  
The site off Jubilee Lane, Milton under Wychwood comprises greenfield land to the south of existing built development. The site is well located to the village edge and represents a logical extension to the village providing an opportunity to improve the character of the edge of the settlement. Planning history for the site is limited.  
Amendment to Policy OS4 ('high quality design') is supported insofar as it clarifies the expectations of the Local Planning Authority in respect of the design of any new development. Our client agrees with the rationale of modifying this policy to bring it in closer accordance with prevailing national policy guidance regarding development proposals which respect, contribute to, and where possible enhance the historic, architectural, and landscape character of a given locality. |
<p>| MM778        | Kier Group              | Kier Group               |                  | 2107              | &gt; SECTION 4 | OVERALL STRATEGY &gt; MAIN 19 | No specific objections are lodged in respect of Policy OS4 - High Quality Design. However, it is important for the purposes of development management in assessing planning applications and appeals that the test in the policy to conserve or enhance areas, buildings and features of historic, architectural and environmental significance should not be read as a requirement in all instances to provide enhancement. Instead the policy should be noted as requiring a neutral impact if policy is to be met. |
| MM61         | NP                      | Mr                       | Pearce           | 539               | &gt; SECTION 4 | OVERALL STRATEGY &gt; MAIN 19 | Not sound                                                                                                                                                                                                        |</p>
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<tr>
<td>MM445</td>
<td>Thames Valley Police - Simon Dackombe</td>
<td>Mr</td>
<td>Dackombe</td>
<td>1006</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>We would request that an additional paragraph be added that recognises that where significant concentrations of new development are proposed (Chipping Norton, North Witney, West Oxon garden village) then this can place an additional demand on infrastructure provision often requiring onsite provision to create sustainable communities and integrate these into the existing adjoining settlements.</td>
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<tr>
<td>MM453</td>
<td>Northmoor Parish Council Mr M Ryan</td>
<td>Mr</td>
<td>Ryan</td>
<td>1056</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>Local Services Schools in the Woodstock/Eynsham/Lower Windrush catchment area could not accommodate the projected increase in pupil numbers and direct discussions with the local Academies involved are long overdue. GP Surgeries are currently overwhelmed or closing when the NHS Transformation plans are looking to move towards greater use of local hospitals, GP surgeries and home treatment. The increased burden resulting from this Local Plan would be simply unsustainable without a transparent approach on how this could be managed. Sewage Disposal Provision. The service is at times currently unable to cope. How will it cope with hundreds or thousands of new dwellings? What discussions have been taking place to overcome this state of affairs for the current households and provide an adequate service to meet future demands? Public Transport is now being axed faster than Beeching’s closure of the railways. How are the transport needs of an ageing population with the influx of the residents of the new dwellings going to be met? These issues need to be part of the Plan and Consultation now, so as to prevent the failure that would be the consequence of an inability and lack of responsibility on the part of the District Council in fulfilling its Plan.</td>
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<tr>
<td>MM457</td>
<td>North Witney Action Group (NWAG) Mr Neyroud</td>
<td>Mr</td>
<td>Neyroud</td>
<td>1332</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>Main 20, Policy OS5. The use of the newly added word “timely” in relation to the provision of supporting infrastructure is greatly concerning. Previously a start had to be made on infrastructure “ahead of the majority of development coming forward.” (Main 102, 9.2.48), but, for whatever reason, this commitment has now been fully deleted. Clearly there is now a probability that vital infrastructure will be significantly delayed. Worse still, there is a real possibility that it (or parts of it) will not be built at all post the starting of the development. NWAG says this situation cannot be allowed to prevail.</td>
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire Mrs Marshall</td>
<td>Mr</td>
<td>Marshall</td>
<td>1595</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>Main 20, Policy OS5. The use of the newly added word “timely” in relation to the provision of supporting infrastructure is greatly concerning, particularly with regard to North Witney. Previously a start had to be made on infrastructure “ahead of the majority of development coming forward.” (Main 102, 9.2.48), but oddly this commitment has now been completely deleted.</td>
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<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>-</td>
<td>-</td>
<td>2146</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>Clearly there is now a probability that vital infrastructure will be significantly delayed by the developers. Worse still, there is a real possibility that it (or parts of it) will not be built at all post the starting of the development. Why would WODC make such an alteration?</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>Jacobs</td>
<td>2190</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>Timely provision of Infrastructure: MM 20 We support MM20 which seeks to emphasise the importance of timely delivery of supporting infrastructure. The local plan should give confidence that infrastructure, particularly critical strategic infrastructure, will be provided when needed. The County Council will work with WODC to ensure that the CIL 123 list and IDP list identifies necessary infrastructure and its phasing.  Soundness Reason: Positively prepared</td>
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td>Small</td>
<td>757</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>We support this proposed main modification and the increased flexibility it provides for the timely provision of supporting infrastructure for new development. This is particularly relevant for large scale urban extensions such as the North Witney SDA and in circumstances where developers do not necessarily control the delivery of supporting infrastructure.</td>
</tr>
<tr>
<td>MM380</td>
<td>Berks, Bucks and Oxon Wildlife Trust</td>
<td>BBOWT - Haidrun Breith</td>
<td>Mrs Breith</td>
<td>Breith</td>
<td>782</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>We are concerned that policy OS5 does not highlight the need for appropriate Green Infrastructure (GI) as an integral part of developments. We believe that projects delivering GI should be developed and should, like other infrastructure projects, benefit from funding through CIL or S106.</td>
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<tr>
<td>MM385</td>
<td>Combe Parish Council</td>
<td>Combe Parish Council</td>
<td>Mrs Sharpe</td>
<td>Sharpe</td>
<td>831</td>
<td>&gt; SECTION 4 - OVERALL STRATEGY &gt; MAIN 20</td>
<td>We support this proposed main modification and the increased flexibility it provides for the timely provision of supporting infrastructure for new development. This is particularly relevant for large scale urban extensions such as the North Witney SDA and in circumstances where developers do not necessarily control the delivery of supporting infrastructure.</td>
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...
The sustainability of the transport infrastructure, which is already under significant pressure, is a particular worry [MAIN 60-63, Policy T1]. We would like to register specific concerns about the impact of increased traffic flows and congestion on quality of life, growing emissions and increasing pollution levels. Combe has already witnessed an increase in the volume and speed of commuter traffic using the narrow village roads to avoid congested routes, with consequences for safety (especially outside Combe primary school) and quality of life. The growth of Stonesfield and surrounding villages is only likely to exacerbate this. Increasing and unsustainable pressure on the A40 is also of central concern. The proposed science park at the Eynsham Garden Village would generate increased commuter flows into the area served by this seriously congested road.

We note that a reduced reliance on the car is central to the Plan's development vision (Para. 3.2) and welcome this, but question whether the proposed modifications to decrease travel by car is fully deliverable. Key limitations arise through:

- patterns of commuting across the region (e.g. to the hospitals, science parks etc.) that fall outside the public transport proposals;
- the assumption that Hanborough station could function as a 'transport hub' [MAIN 66, Para. 7.57b]. This assumption, which is integral to the sustainable transport strategy for Eynsham Garden Village, seems misplaced. This service is operating at full capacity, with passenger numbers having more than doubled in the last five years. There are significant existing pressures on car parking for commuters from villages with no integrated bus service (e.g. Combe). The current service is unreliable and it is uncertain whether proposed upgrades could be deliverable in the required timescale. The proposed electrification of the Cotswold line has already been seriously delayed until 2024;
- the timing of key modifications to the A40, and the challenges of alleviating congestion given existing pressures on this road.

If proposed transport improvements do not come to fruition, we fear that we will see further displacement of traffic from congested roads such as the A40 into the villages and on to other heavily loaded roads such as the A4095, as well as increasing pressures on existing commuter bottlenecks such as Swinford Bridge. Commuters readily revert to their cars when public transport fails to serve them adequately.
**SECTION 5 – PROVIDING NEW HOMES**

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<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>1872</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 21</td>
<td>MM21 - Paragraph 5.1</td>
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<td>MM21 is supported, which states that growth needs to be effectively managed in order to prevent significant change to the intrinsic character of the District, and this highlights that the strategy proposed by the Council in draft Policy H1 is flawed in particular with regard to the fact that significant development is proposed in both Woodstock, Chipping Norton and Burford which will negatively impact upon the historic character of Woodstock and the adjoining Blenheim World Heritage Site; would affect a substantial piece of land which is a Conservation Target Area (CTA) at Tank Farm (owned by the County Council), east of Chipping Norton which is stated in Main Modification 68 as the potential to be an Ecological constraint, and which relies on the delivery of a relief road which includes third party land; and would relate to land within the AONB at Burford which could be met in locations outside of the AONB in accordance with the advice in Paragraph 116 of the Framework. The draft plan is inconsistent with national policy and not justified when considered against the reasonable alternatives to development outside the AONB.</td>
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<tr>
<td>MM752</td>
<td>Bloombridge</td>
<td>Bloombridge</td>
<td>Mr Cutler</td>
<td>1874</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 21</td>
<td>MM21 - Paragraph 5.1</td>
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<td>MM21 is supported, which states that growth needs to be effectively managed in order to prevent significant change to the intrinsic character of the District, and this highlights that the strategy proposed by the Council in draft Policy H1 is flawed in particular with regard to the fact that significant development is proposed in both Woodstock, Chipping Norton and Burford which will negatively impact upon the historic character of Woodstock and the adjoining Blenheim World Heritage Site; would affect a substantial piece of land which is a Conservation Target Area (CTA) at Tank Farm (owned by the County Council), east of Chipping Norton which is stated in Main Modification 68 as the potential to be an Ecological constraint, and which relies on the delivery of a relief road which includes third party land; and would relate to land within the AONB at Burford which could be met in locations outside of the AONB in accordance with the advice in Paragraph 116 of the Framework. The draft plan is inconsistent with national policy and not justified when considered against the reasonable alternatives to development outside the AONB.</td>
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<tr>
<td>MM773</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>2085</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 21</td>
<td>We would comment that the addition of text to paragraph 5.1 is contradictory to the core objective of promoting growth within the District. It is acknowledged and agreed that growth needs to be effectively managed however there is likely to be some significant change to the intrinsic character of the District. We would therefore suggest amended wording to the last sentence of this paragraph to be as follows:</td>
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<td>&quot;However, growth needs to be effectively managed in order to substantial harm to the intrinsic character of the District.&quot;</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>540</td>
<td>MAIN 21, Para 5.1</td>
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<td></td>
<td>Not sound</td>
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<td>How can a Garden Village (and the extra homes west of Eynsham) ‘prevent significant change to the intrinsic character’ of this part of the District, when open space will disappear, farmland and biodiversity will be destroyed or reduced, and roads and traffic will be added to currently rural locations?</td>
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This policy stipulates that development should "...prevent significant change to the intrinsic character " of the District. It is self evident from the responses above that the development of Eynsham North would have a severe, long term impact upon the attractive rural landscape between Eynsham and Freeland villages resulting in a significant change to the District's local " intrinsic character."

3. OVERALL STRATEGY AND PROVIDING NEW HOMES
Policy OS2 – Locating Development in the Right Places (MM16)

3.1 The Submission Draft Local Plan (May 2015) contains core objectives to help guide the development of the District. Core objectives C01, C02 and C04 place significant emphasis on locating development in appropriate locations where it can meet local needs and reduce the need to travel. These core objectives are taken forward into a defined settlement hierarchy and a development strategy set out by Policy OS2 – Locating Development in the Right Places, which is effectively the plans spatial distribution policy. Policy OS2 is therefore clearly a major policy which goes to the very heart of the Local Plan. Policy OS2 is subject to a major modification (Modification 16).

3.2 Our principle issue with the revised policy is the extent to which it has been modified which results in a very different plan to what was submitted. We have raised a number of issues with regard to the manner in which this policy has been modified from a procedural perspective in Section 2.

3.3 Regarding the revised Policy OS2 itself, we continue to support the identification of the three main service towns as the principle focus for development, including Chipping Norton. However, it is now clear that Eynsham will effectively become a settlement that will have a higher population than Chipping Norton and Carterton. In effect, it will become the second largest settlement in the District. We do not believe this is consistent with the long-established 'three towns' strategy and this therefore has implications for the Local Plan as a whole.

3.4 Whilst we note that a wider dispersed option was tested through the SA, there does not appear to have been an option that looked specifically at dispersed growth option in the eastern part of the district, which could have considered for example, an alternative option to targeting growth towards the settlement of Eynsham could have been to consider additional growth spread across the villages to the Eynsham-Woodstock sub area of the District and perhaps areas to the east of Witney, Duckington, Hailey, Finstock, Stonfield and Charlbury. Dispersed growth across these settlements would appear to be a potential option to meet Oxford’s unmet needs.

3.5 ASL support the recognition that further allocations may need to be made through Neighbourhood Plans in relation to villages but note that should it become evident that the Local Plan is not delivering, there will need to be sufficient policies and triggers within this Local Plan to require an early review, as the burden to meet needs cannot simply be left to local communities.

Policy H1 – Amount and Distribution of Housing (MM21 to MM24)

3.6 Regarding MM21, we do not dispute the position that the level of growth needs to considered against associated impacts, but we are not convinced that ‘growth needs to be managed in order to prevent significant change to the intrinsic character of the District’ is the correct term to use here as the barometer to
which impact will be considered. Indeed, the modified Plan proposes significant change to the character of some areas (i.e. Eynsham). The test has to be if the meeting needs would significantly and demonstrably outweigh the benefits, as set out at paragraph 14 of the NPPF.

3.7 With regard to the overall quantum of housing now being proposed as part of MM22, we can confirm that we support the evidence base conclusions on housing requirements, which have been placed within the Modified Policy H1 (MM24). ASL support the 15,950 dwelling requirement overall, which comprises of 13,200 homes for West Oxfordshire and 2,750 homes for Oxford’s unmet needs that are now enshrined in this policy.

3.8 ASL do not take specific issue with the proposed distribution of new homes. Indeed, we support the requirement for the Chipping Norton sub area at 2,400 new homes over the plan period and notwithstanding our points regarding statutory requirements in relation to the preparation of a Local Plan (as set out in Section 2), we do not take particular issue with the spatial distribution that is being proposed, we just do not feel such a major change can be enveloped into the current process without serious risk of by-passing key requirements of the law when preparing a Local Plan. Put simply, we thing the changes have gone a step to far to be incorporated in to this plan as modifications post submission of the plan.

3.9 The increased housing requirement within each of the districts sub-areas is set out in Table 1 (ATTACHED). The housing requirement for the District has gone up by 51%, which has then led to significant changes to the spatial distribution of development.

3.10 The Eynsham-Woodstock sub-area requires 243% more homes than originally envisaged within the Submission Draft Local Plan, which perfectly highlights the substantial change to the distribution of development that is now being promoted.

3.11 Chipping Norton’s requirement has also increased by 50% and as noted above we support this as it brings it more in line with requirements for the other three main towns (whilst noting Chipping Norton is the smallest of the three towns). However, as noted in Section 2, in proposing this increase in housing numbers for the settlement, the Council have only considered one option for delivering this number of new homes through the SA by increasing the size of the Tank Farm Site (SDA).

3.12 We note the other areas have not increased as much and even in those instances, we note the SA has tested various site options for the increased growth.

3.13 In terms of other issues with the revised policy, we object to the notion that the Garden Village should be regarded as a free standing settlement. It isn’t and is clearly related and connected to Eynsham, with the site and urban boundaries adjoining and the entirety of the site falling within Eynsham Parish.

3.14 We continue to support the final paragraph in Policy H1 which confirms the Council will monitor development annually to ensure that the overall strategy is being delivered.
Revised Policy H1 proposes to meet West Oxfordshire’s housing needs as identified in the 2014 Oxfordshire SHMA (660dpa) over the period identified in the SHMA (2011 to 2031). In addition, the Council propose to deliver a further 2,750 homes over the second half of the plan period (2021 to 2031). This commitment is predicated upon a memorandum of understanding between the Oxfordshire Authorities (reached in September 2016) for West Oxfordshire District Council (WODC) to contribute towards unmet needs in Oxford City.

Upon review of the Oxfordshire SHMA, it is clear that the objectively assessed housing need figure for Oxford City Council covers the period 2011 to 2031. Work undertaken by the Oxfordshire Growth Board has confirmed that Oxford City Council (OCC) has an unmet need of 14,850 dwellings, to be provided in other Oxfordshire Authorities.

Whilst the Council's acceptance of the requirement to meet a proportion of OCC’s need is positive in terms of working with the Council’s neighbours so to meet full objectively assessed needs in the housing market area; we object to the proposed phasing of OCC’s need until 2021 for the following reasons.

First, this approach is contrary to the EiP Inspector’s preliminary findings. When considering the needs of OCC in his preliminary findings, the EiP Inspector stated:

>'In eventually considering the soundness of this plan (following the further work and consultation on the matters of concern in this Note) regard would have to be given to any apportionment to West Oxford made by the OGB. If any such apportionment is made then that would become part of the housing need for the district. Any such apportionment is not immediately a definitive housing requirement, since it must be taken through a local plan process to test its deliverability and environmental impact. Nevertheless, it will be a figure of considerable significance and weight, since it will have emerged from an evidence-based process to inform spatial options for growth outside Oxford City. My initial view is that it would need to be taken into account in calculating the 5 year land supply' (Paragraph 7.6). (Our emphasis).

The above provides that the EiP Inspector’s initial view was that OCC’s unmet need should be included in any 5 year housing land supply calculation today. It is highly relevant that OCC’s needs are backdated to 2011 and 5 years have already passed, in which no strategy as to accounting for unmet needs has been identified. It follows that there is a pressing need to identify ways of meeting this need now. WODC’s intention to delay the delivery of this need (that already stems from a base date of 2011) for another 5 years is therefore contrary to the EiP Inspector’s interim findings.

Second, and for the reasons set out above, the proposed phasing of the requirement is contrary to paragraph 47 of the NPPF that seeks to boost significantly the supply of housing.

Third, the Council’s justification for not meeting OCC’s need until 2021, relies upon a decision to allocate two strategic urban extensions at Eynsham and the associated lag times that will occur between the allocation of these strategic sized sites and first housing completions. WODC have therefore made a plan making decision not to identify a larger suite of smaller / medium sized sites to support these strategic allocations, contrary to the EiP Inspector’s comments. As set out in other representations, suitable, available and achievable sites exist to supplement the identified strategic and non-strategic...
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<tr>
<td>MM490</td>
<td>M/S Strainge</td>
<td>Mr Strainge</td>
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<td>1225</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>sites that are not presently allocated in the plan and could assist in meeting OCC's needs now. For the above reasons, the plan is not justified when compared to the reasonable alternative of allocating additional small/medium sized that can deliver in the immediate 5 year period and contribute towards OCC's unmet needs immediately. In addition, the proposed phased requirement is contrary to NPPF paragraph 47 and therefore inconsistent with national policy and is not effective when considered against the alternative of meeting a neighbouring Council's needs earlier in the plan period.</td>
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<td>RESPONSETOTHEWESTOXFORDSHIRELOCALPLAN-SCHEDULEOFPROPOSEDMAIN MODIFICATIONS-ONBEHALFOFMESSRSSTRAINGEPESAHELLFARMCURBRIDGEWITNEY</td>
<td>This statement has been prepared by Brown and Co on behalf of clients and landowners MjS Strainge in response to the consultation on proposed modifications to the draft West Oxfordshire Local Plan 2031... These representations relate specifically to our clients land to the West of Witney, located to the West of Downs Road between the West Witney Urban Expansion, and Minster Lovell. The land in question is highlighted as an 'area of long term future development potential' in Main 115 and 116 - FIG9.6, and is therefore favoured as the future direction of growth for Witney. General comments Further to the Examination in Public in late 2015, the Local Plan was suspended for 12 months as a result of the Inspectors Preliminary findings. The suspension has allowed the preparation and consultation on necessary changes to the Plan (the 'main modifications') and also to consider the unmet need from Oxford City's housing numbers, and the proportion that is to be attributed to WODC. We are encouraged by the process that plan has made, with an increase in the housing numbers from 10,500 to 15,950 within the Plan Period 2011-2031. We understand that of the 15,950, 13,200 dwellings are required to meet West Oxford's identified housing needs and a further 2,750 are to meet WODC's proportion of Oxford City's unmet housing need. We would however draw to your attention to the fact that South Oxfordshire have not agreed to the Oxfordshire Growth Board distribution to Oxford's unmet needs within SODC, and that as a result, the unmet need to be apportioned to West Oxfordshire may still be subject to change to resolve this situation. Flexibility should therefore be built into the plan to ensure that there is a sufficient supply of available and deliverable sites that can brought forward should the objectively assessed and unmet housing need change. Whilst the notion of accommodating Oxford's unmet needs is generally supported, we have some concerns over the 'ring fencing' of this figure (2,750) as a separate quantum, effectively treating it as a separate housing need as a standalone, separate to that of the OAN for the wider WODC. Our concerns stem from the strategy response to treating the unmet need through the provision of a new Garden Village. The proposed Eynsham Garden Village will require significant infrastructure requirements, has a complex nature of landownerships, with varying different aspirations, and will take many years to...</td>
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| MM491        | Crest Strategic Projects | Crest Strategic Projects | > SECTION 5 - PROVIDING NEW HOMES > MAIN 22 | Main 22: Paragraph 5.8–5.17

3.5 The proposed modifications that accept the Oxfordshire SHMA OAHN figure for West Oxfordshire of 660 dwellings per annum 2011-2031 (13,200) are supported and reflect the evidence provided by GL Hearn to the first stage hearings in 2015.

3.6 Similarly, GL Hearn supports the undertaking to make provision for up to 2,750 dwellings to contribute towards meeting the Oxford Growth Board (OGB) working assumption of 15,000 dwellings that constitute Oxford City’s likely unmet need for housing within the plan period.

3.7 Paragraph 5.14 notes that this will require an annual average rate of delivery of 935 dwellings per annum over the plan period, which is characterised as an extremely challenging delivery target for the house building industry. While this is acknowledged it is pertinent to note that the Inspector recognised in his Preliminary Findings (para.4.3) that between 2005 and 2007, when an adopted Local Plan containing housing allocations was in place, delivery averaged around 800 dwellings per annum. Therefore, while historic long-term rates of housing delivery may average only around 50% of the proposed Local Plan target, with the introduction of a positive policy context and sufficient deliverable housing allocations the housebuilding industry is able to respond positively to the ‘challenge’.

| MM741        | CPRE Oxfordshire       | Mrs Marshall     | > SECTION 5 - PROVIDING NEW HOMES > MAIN 22 | CPRE’s view remains that housing need in Oxfordshire has been exaggerated and considers the target set in clause 5.15 & Policy H2 is too high. Factors like a significant upwards adjustment for an unproven, unattributable population change (UPC) in Oxford have bolstered the numbers. Other factors built into the model include low occupancy and low economic activity per home. The number of jobs expected has not been converted to an FTE figure. When the model relies heavily on high in-migration and the main purpose of accelerated housebuilding is to provide affordable housing and also workers to fill expected jobs growth, the assumptions regarding low occupancy and economic activity per home make no sense. With affordability an undoubted issue, people won’t have enough money to live at low occupancy especially with less people working in each household. The mix of housing proposed includes significant family housing, which means that the model relies on increased under-occupancy, which is unlikely in the current climate. Anyway, underoccupancy is already high here. Counter factors such as extended working age and existing resources amongst working age people within the County, have been ignored.

The end result is a proposal to build 40% more houses in Oxfordshire than have ever been built before. These 100,000 houses will be supported by 88,000 jobs (i.e. 0.88 jobs per home), yet currently 260,000 houses are supported by 360,000 jobs (i.e. 1.4 jobs per home).

It is obvious then that prosperity will suffer and the economic growth does not match the planned housing and population growth. The model is therefore flawed. Even the expected economic growth at the heart of the SHMA relies principally on increased jobs in the service sector, which in turn relies on population growth. Therefore, the SHMA is largely based on a circular argument and the jobs growth may well not materialise to the extent hoped.

CPRE therefore does not agree with the SHMA and sees it as representative of a desire to grow, as opposed to an objectively assessed need.
CPRE welcomes the most recent work carried out by Peter Brett, suggesting a compromise target of 568 homes per annum. The number of working age people has been reconsidered and found to be higher than the SHMA analysis. Nevertheless, this new study is still attempting to meet the growth plans initiated by OxLEP, which are driving the County's future. Past out-commuting trends are carried forward and part-time jobs are ignored in line with the SHMA. The distortion in doing so is at least acknowledged by Peter Brett, which CPRE considers to be positive, even though no adjustments have been made. In particular, thousands of people out-commute from West Oxfordshire to work already. So, should we encounter jobs growth here, it makes sense to seek to reduce the out-commuting ratio, rather than carry it forward in determining the population and housing growth needed to support the new jobs. Here, we are lacking sufficient jobs for the existing population, so if jobs grow, we don’t necessarily need more people. In fact, more people out-commute now than the number of workers required to fill the expected number of new jobs in the Plan Period. That’s unsustainable and we should certainly not plan to allow 18% of the future immigrating workers to out-commute. Why bring them here to live, only to work elsewhere?

Neither the SHMA nor the Peter Brett study have considered what impact increased growth in other districts will have on the market in West Oxfordshire. Because of past underdelivery, the other Oxfordshire districts have to increase delivery by a factor of 2.5 under the SHMA moving forward. This is bound to have an impact on demand in West Oxfordshire, which was the only district over delivering in the last plan period. People moved here, because there weren’t enough houses elsewhere, but that is changing. Land is now being sold off by the MOD at 3 sites elsewhere in the County and these are surely better sites for housing than sites on green-field land.

Still it is regrettable though understandable that the Peter Brett study is not being used to determine the target. WODC is reverting to the higher SHMA figure of 660 homes per annum as noted in clauses 5.8 & 5.12s, as it is the least risky option. Clearly the sooner a plan is in place, the better to avoid uncertainty, but CPRE reservations on the validity of the target remain, based on the logical arguments put forward. If the Council is minded to go ahead, an early review is essential.

It is important to understand that the SHMA is representative of only one version of the future, which may be unlikely. It should not be considered as an absolute and used to justify applications that will do significant harm. Therefore, CPRE would encourage an early review in case CPRE’s concerns that the target is too high prove founded. The review should exclude an upwards adjustment, but consider whether the target does exceed the demand and need, as suspected by CPRE and indeed many. CPRE suggests an earlier review than the 5 year timeframe suggested in clause 1.7. Should the target prove to be above the need, then ‘spare’ allocations without permission could be dropped or carried over to the next Plan Period to avoid unnecessary harm moving forward. For sure, sustaining this level of growth beyond 2031 will be difficult.

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<td>Helen CPRE Oxon Mrs</td>
<td>Marshall</td>
<td>1453</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>Oxford Overspill With regard to policies H1, H2 and clauses 5.14 &amp; 5.19, CPRE does not agree with the SHMA figures regarding the housing need in Oxford City and in particular the use of the UPC to justify most of the unmet need. It’s a thumb in the air on a matter that has too much impact to be based on such flimsy evidence. West Oxfordshire is expected to take 2,750 homes for Oxford, bringing the total to 15,950 or 890 per annum. Considering that the target suggested in 2011 was 300 per annum, this is an increase that is unlikely to be achieved. Oxford City has too many jobs for the number of people. West Oxfordshire has too many houses for the number of jobs. The obvious and sustainable solution is to encourage more jobs in West Oxfordshire to</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
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for this period. Consequently, there is significant un-met need already arising from the city and therefore West Oxfordshire must include an appropriate response through their Local Plan to address this. Coupled with the Council’s approach to five year housing supply (discussed separately below) this underlines the need for the Council to augment its housing land supply to identify and allocate additional land for housing in the short term to meet housing needs in the first half of the plan period.

This is especially important given the existing significant shortfall of 1,836 homes (the equivalent to a 23/4-year shortfall against the SHMA), the very serious affordability concerns in the local area (house prices 10 times lowest incomes) and in light of the Inspector’s preliminary findings that it was his initial view that unmet need would need to be taken into account in calculating the 5-year land supply (Paragraph 7.6 (IN015)). A consequential change to MAIN23 (paragraph 5.22) is required to delete this additional text which refers to taking Eynsham into account for land supply purposes from 2021 onwards.

Notwithstanding our concerns regarding the Council’s approach to only addressing unmet needs from the City of Oxford post 2021, the expectation that North Eynsham will deliver 220 dwellings per annum over a 10-year period is both optimistic and unrealistic. It is highly likely that North Eynsham will continue to deliver homes beyond the plan period. Whilst that in itself is not of concern, this underscores that it is unlikely to yield the number of homes within the plan period as claimed by the Council. The recent NLP report on housing delivery in November 2016 confirms that the average planning approval period for sites of 2,000 or more dwellings is 5 years and the average annual build out rate for sites of 2,000 or more dwellings is 161dpa. This reflects the limits to number of sales outlets possible on a site, and overall market absorption rates. Given the proximity of West Eynsham to the North Eynsham proposal, this is likely to affect the rate of delivery overall in terms of local market competition. We consider that Eynsham is unlikely to yield development completions in 2021 given the need for the planning approval process, including an Area Action Plan (AAP) prior to a planning application and recognition of a delivery rate of 160dpa and a start in 2022 (at the earliest) (the site is unlikely to deliver completions in its first monitoring year), the site will only deliver up to 1,440 homes in the plan period: 760 less than assumed by the Council.

MAIN22 (paragraph 5.14) asserts that the delivery of unmet Oxford City housing need at North Eynsham will be delivered in the period 2021 to 2031 - which would require delivery of 220 dwellings per annum from a standing start in 2021: itself highly optimistic - rather than starting to address unmet needs also within the first 5 years of the plan period given the under delivery of homes in the City 2011-16. Whilst it is not disputed that Eynsham will not deliver prior to 2021, this underlines the need for the Council to augment its housing land supply to identify and allocate additional deliverable land for housing in the short term to meet housing needs in the first half of the plan period. This is especially important given the significant shortfall of 1,836 homes, the serious affordability concerns in the local area (house prices 10 times lowest incomes) and in light of the Inspector’s preliminary findings that it was his initial view that unmet need would need to be taken into account in calculating the 5-year land supply (Paragraph 7.6 (IN015)).

Furthermore, it is considered a key concern that there is too high a reliance on development which will deliver after 2021 within the plan as a whole. The Council’s Housing Land Supply Position Statement October 2016 indicates only 1,035 homes out of 8,169 dwellings on proposed allocation sites in the draft Plan will occur prior to 2021: that is a paltry 12.6% or 207dpa. This will only address a little over half of the current backlog let alone what is needed going forward and consequently this will impact upon whether the 20% buffer should be applied within the district. This extremely low delivery for the first 10 years of the plan further risks exacerbating affordability challenges district wide and places further stress on housing need.
that decision making should proactively drive and support sustainable development to deliver the homes, businesses, infrastructure and thriving places that the country needs.

One of the key objectives of the NPPF is to boost the supply of housing required to meet the needs of present and future generations, whilst delivering a wide choice of high quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities.

New para 5.13 sets out that "in addition to meeting West Oxfordshire's identified housing needs we are committed to assisting our neighbours Oxford City" and establishes a working assumption of 15,000 homes over the Plan Period.

The pressing need for new housing has been translated into policy targets for the delivery of new homes across West Oxfordshire, and across the County.

New paragraph 5.14 continues, stating "it has been agreed that West Oxfordshire will accommodate 2,750 homes in the period between 2021 and 2031 to assist Oxford City with its unmet housing need". The District Council acknowledges that "this rate of delivery is nearly double the historic long term housing delivery rate in the District and will be extremely challenging for the house building industry to deliver."

Paragraph 181 of the NPPF states that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.

In this regard we would support the increased housing allocation for the District, both in terms of providing for its own housing needs and those of Oxford City.

The Plan demonstrates cross-boundary cooperation across Oxfordshire in seeking to deliver the homes the county needs, in accordance with the provisions of the NPPF.

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<td>Strong objections are raised in respect of this Main Modification.</td>
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Particular objections are raised in respect of the level of unmet need from Oxford City being accommodated within the District. Paragraph 5.13 of the Plan sets out that a working assumption of 15,000 homes has been agreed by the Oxfordshire Authority's as representing the quantum of Oxford's unmet housing need which must be accommodated elsewhere within the Oxfordshire Housing Market Area. However, the actual unmet need as set out within the SHMA is a range of between 15,000 – 18,000 homes. The District have applied a midpoint in applying the SHMA to the District's own housing need and in the interest of consistency the same approach should be taken in respect of Oxford City's housing needs.

Furthermore, Paragraph 5.14 states that it has been agreed that West Oxfordshire will accommodate 2,750 homes in the period 2021 – 2031. This equates to 935 dwellings per annum when added to the Districts own housing requirements however this excludes past backlogs.

It is not considered that the 2,750 homes is an agreed, reasonable and proportionate division of Oxford City needs given that between 15,000 and 18,000 homes are to be distributed across the four Oxfordshire Districts.

In addition, if the annual housing requirement (the Districts own housing needs together with Oxford City needs) do not include for past backlog, any calculation of housing land supply will need to factor in the
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<td>MM67</td>
<td>Miss Garrett</td>
<td>Miss Garrett</td>
<td>Garrett</td>
<td>174</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>The new local plan takes account of Oxford City's inability to meet its housing requirement. However, the plan proposes to impose 2,400 new homes on Chipping Norton (roughly doubling the size of town). Chipping Norton is NOT served by adequate public transport links to Oxford for the existing population, let alone roughly double the number of residents. In addition, the A44 heading towards Oxford is already unacceptably congested at peak times. The traffic from Chipping Norton would also be joining the additional traffic from a significant number of new homes in Woodstock. I do not consider that this proposal is an appropriate way to deliver additional housing for Oxford. I would respectfully suggest that Oxford be asked to reconsider its own backlog and due consideration will need to be given as to whether a 5% or 20% buffer should be applied on the basis of persistent underperformance. Furthermore, as drafted the Plan does not reflect the latest position within the wider Strategic Housing Market Area in the context of the Duty to Cooperate. A Memorandum of Cooperation exists between all of the Oxfordshire Authorities in the context of having to meet the needs of Oxford City which cannot be accommodated within the city boundary. The Oxfordshire Growth Board have been tasked with identifying housing needs in Oxfordshire and then agreeing distribution across the authorities. The Plan for West Oxfordshire has been drafted on the basis of taking 2,750 houses in accordance with the Memorandum of Cooperation however South Oxfordshire have not agreed to their proportion of housing as confirmed at the Oxfordshire Growth Board meeting on 27th September 2016. This is significant and goes to the heart of soundness for two key reasons: Firstly, the Duty to Cooperate cannot be said to be met when one of the parties with whom West Oxfordshire are seeking to cooperate with are not in agreement on the strategy for distributing unmet housing need from Oxford City. This in itself indicates that the Plan for West Oxfordshire cannot be sound; and In terms of housing numbers, South Oxfordshire were recommended as part of the Duty to Cooperate to accommodate 4,750 houses from Oxford City. This compares with 4,400 houses for Cherwell District, 2,200 for the Vale of White Horse and 2,750 houses in respect of West Oxfordshire. Thus, it can be seen that South Oxfordshire were proposed to accommodate the greatest proportion of Oxford City's unmet housing need and therefore the scale of the issue that has now arisen given that South Oxfordshire have not agreed to take these housing numbers is far greater than had the situation arisen in Cherwell District, Vale of White Horse District or West Oxfordshire District. The consequence is that objectively assessed housing need are not being met in the housing market area until such time as either South Oxfordshire reverse their position and accept 4,950 houses arising from Oxford City; or the remaining authorities agree to take additional housing to reduce the amount that South Oxfordshire have to accommodate, to such a level that South Oxfordshire are prepared to agree to the housing numbers to be delivered in their administrative boundary. There is no resolution to this matter and no indication from the Oxfordshire Growth Board Meeting of 27th September 2016 as to the extent of housing from Oxford City that South 15.065/Reps Oxfordshire District are prepared to accommodate. There is no alternative strategy available to the local authorities in Oxfordshire and no easy solution. Such are the implications arising from the wider Housing Market Area it is recommended that further work on the West Oxfordshire Plan, including progressing further with the Examination be put on hold pending resolution of these key issues at the heart of Oxfordshire and the West Oxfordshire Plan.</td>
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<td>MM739</td>
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<td>Miss Kateley</td>
<td>1759</td>
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<td>local plan to identify opportunities for development.</td>
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<td>East Witney Land Consortium</td>
<td>c/o Carter Jonas</td>
<td>1769</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
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<td>The EWLC supports the Council’s intention to meet its Objectively Assessed Housing Need of 13,200 homes, as set out in the Oxfordshire SHMA 2014. We further support the Local Plan making provision to accommodate some 2,750 units of the Oxford City unmet housing need, as confirmed in draft Policy H1 and H2.</td>
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<td>MM749</td>
<td>Home Builders Federation Ltd</td>
<td>Mr Stevens</td>
<td>1817</td>
<td>&gt; SECTION 5 - PROVIDING NEW</td>
<td>MAIN 22 (paragraphs 5.8 – 5.17)</td>
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**Introduction**

We write on behalf of our client the Church Commissioners for England (the Commissioners) which manages a well-diversified investment portfolio to support the Church’s work across the country and is a long-term landowner in the West Oxfordshire area. We understand that the Council are currently consulting on the proposed modification to the Submission Draft West Oxfordshire Local Plan Local Plan 2031 Consultation.

The Submission Draft West Oxfordshire Local Plan Local Plan 2031 seeks to address the initial concerns raised by the inspector in December 2015 following the first Local Plan hearing which dealt with strategic matters. These concerns generally related to the overall housing requirement and deliverability of these sites. We recognise that in response West Oxfordshire has increased the total housing requirement to 15,950 homes, allocated new sites and increased the size of strategic sites.

We submitted representations in relation to the following five sites located within West Oxfordshire on behalf of the Commissioners to the West Oxfordshire Call for Sites in February 2016:

- Land North of Bampton
- Deanery Farm
- Church Close
- Land at Lower Farm Cottages
- Ansells Farmyard

All five sites are immediately available and are suitable for allocation. We understand these have not been included within the Submission Draft West Oxfordshire Local Plan Local Plan 2031 and instead there is a focus on larger allocations.

**Housing**

We understand that MAIN22 of the Submission Draft West Oxfordshire Local Plan Local Plan 2031 now includes a proportion of 2,750 Oxford’s unmet housing need as well as West Oxfordshire’s own housing need. MAIN 23 and MAIN24 then highlights how this and West Oxfordshire’s own housing need will be accommodated across the borough. Smaller sites can make a significant contribution through windfall development to meeting this housing target.
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<td>HOMES &gt; MAIN 22</td>
<td>We strongly support the Council's decision to re-base its local plan on meeting the level of housing need that was judged to be necessary under the Oxfordshire Growth Board's Committed Economic Growth scenario (SHMA 2014). This is a very positive and most welcome move on the part of the Council. There is now a strong prospect that the full housing and employment needs of Oxfordshire, including Oxford City, are going to be planned for and hopefully met by 2031. Paragraphs 5.13 - 5.23 We note that the Council will be making provision for Oxford City's unmet need. This is a most welcome development and is strongly supported by the HBF. We commend the Council for committing to this path of action. The Oxfordshire authorities can probably make claim to being the first HMA in the country to have the makings of coordinated plans that will deal with a major unmet need from a land constrained conurbation (although they may be beaten to first place by the Horsham/Crawley/Mid Sussex HMA). Nevertheless we have some remaining concerns. Some of these concerns may relate to matters of soundness. Paragraph 5.15 shows that planning for an element of Oxford City's unmet need results in a requirement that is: 13,200 for the period 2011 – 2031 to meet West Oxfordshire's housing need; and 2,750 for the period 2021 – 2031 to meet an element of Oxford City's unmet need. Overall housing requirement = 15,950 homes. We have four concerns that flow from this. First, it is unclear what the basis is for the decision that 2,750 homes is adequate. It is unclear how this figure has been decided upon as an appropriate share for West Oxfordshire. It would be helpful if the Council could clarify what the basis is for the apportionment as there does not appear to be any supporting documentation. We note paragraph 5.14 which states that this figure has been agreed by the Oxfordshire Growth Board but there is no supporting documentation of the Council's web-site to show this. This may be a matter of soundness. If the six authorities of the HMA are unable to show how the full OAN for the HMA is accommodated, then the West Oxfordshire Plan may fail the positively prepared test of the Framework. Second, it is unclear whether the apportionment for the plans for the other three authorities (Cherwell, Vale of White Horse and South Oxfordshire) will be adequate to meet Oxford City's full unmet need. If the duty to cooperate has been effectively discharged then the Council should be able to clarify whether Oxford City's unmet need of 15,000 homes will be met in full by 2031 or if there is a residual figure that still needs to be planned for. If there is a residual figure then the Plan needs to be clear about how West Oxfordshire working with the other four authorities intends to address this issue by 2031. Is it intended to review the plan within five years? Third, we do not agree that the delivery of Oxford City's unmet need has to be confined to the period 2021 – 2031. There is no justification for this. Providing for an element of Oxford City's unmet need does not have to be confined to a particular time period and to one specific location (the West Oxfordshire Garden Village).</td>
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<td>MM746</td>
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Modifications. As was acknowledged by the Inspector in Part 2 of his Preliminary Findings (IN 016), there are considerable delivery risks associated with the development of this allocation owing to conflicting aims between the main parties, and the landowner not owning all the land required to deliver the requisite highway infrastructure (IN 016, paras. 2.3-2.6). Although the Council has responded by amending the delivery trajectory to postpone first completions until 2021-22, there is no certainty that the difficulties can be resolved.

With regard to Witney, given the delays in bringing forward the strategic development area to the west of the town, together with the substantial strategic development areas identified in the current Plan, the uplift in housing delivery required to yield its capacity in the period to 2031 is substantial for a town of its size. It is questionable whether the local market can sustain substantial sales volumes from three strategic development areas simultaneously, as well as a number of smaller sites, to deliver its required contribution during the plan period.

Through the proposed modifications the overall requirement for the Chipping Norton Sub-Area is increased by approximately 33%. This compares with a proportionate increase of approximately double that for the other sub-areas combined comprising the south of the plan area. That is a disproportionate increase that reflects the strategy to focus on a small number of large strategic sites in each of the sub areas.

The strategy for the Chipping Norton Sub-Area seems to be driven by the environmental sensitives affecting the principal settlement itself, and in particular its “… prominent hill-top position on the eastern edge of the Cotswolds Area of Outstanding Natural Beauty (AONB) within which most of the town is situated” (para. 9.4.1). However, those constraints do not affect the other principal settlements in the sub-area of Enstone and Middle Barton, which are outside the AONB and, particularly in the case of Middle Barton, a considerable distance away from it. In setting a capacity for the sub-area as a whole, insufficient regard appears to have been had to the potential of smaller settlements to accommodate growth.

To reduce the risks of delivery failure a more balanced distribution is required that increases the requirement for the Chipping Norton Sub-Area and provides a wider development focus, including smaller development opportunities at the rural settlements that can make an early contribution to improving the five year housing land supply. To achieve this more balanced strategy, a Rural Service Centre should be designated in the northern part of the Plan area, in which respect Middle Barton is the most appropriate settlement.

Principle of increasing housing need

The Council’s Housing Land Supply Position Statement October 2016 sets out the Council’s housing land supply position for the five year period 1st April 2016 to 31st March 2021. We agree with the conclusions of assessment in terms of revised housing numbers for the District which is based on the conclusions of the partial update of the Oxfordshire Strategic Housing Market Assessment (SHMA), and updating of other technical studies such as the Infrastructure Delivery Plan (IDP) and the Strategic Flood Risk Assessment (SFRA).

We also agree with the approach to accommodate some of the agreed housing shortfall from Oxford City Council which is an agreed requirement of the duty to cooperate. We note that these changes respond directly to address concerns raised by the Inspector to date.

MAIN 22 Para 5.8 states:

*The most up to date assessment of housing need in Oxfordshire is set out in the Oxfordshire Strategic
Housing Market Assessment (SHMA) which was published in April 2014. In relation to West Oxfordshire, the SHMA identifies the need for between 635 - 685 homes per year in the period 2011 - 2031. The mid-point figure is 660 homes per year and this is defined as the 'objectively assessed need' or DAN. The proposed housing requirement for West Oxfordshire in the period 2011-2031 is therefore 660 homes per year which equates to 13,200 homes in total. This will require a significant increase in the future rate of delivery of new housing in the District in comparison with historic long term delivery rates particularly when 'under-supply' since 2011 is factored in. In addition to meeting West Oxfordshire’s identified housing needs we are committed to assisting our neighbours Oxford City. Evidence demonstrates that Oxford City cannot meet their housing need in full within their own administrative boundary. A working assumption of 15,000 homes has been agreed by the Oxfordshire authorities as representing the quantum of Oxford's ‘unmet’ housing need which must be accommodated elsewhere within the Oxfordshire Housing Market Area (HMA). Joint working has been taking place between the Oxfordshire local authorities and co-ordinated via the Oxfordshire Growth Board (OGB). As part of this process it has been agreed that West Oxfordshire will accommodate 2,750 homes in the period between 2021 and 2031 to assist Oxford City with its unmet housing need. In order to meet this apportionment, and deliver the District’s own housing needs, 935 dwellings per year will need to be delivered between 2021 and 2031 (excluding past backlog). This rate of delivery is nearly double the historic long term housing delivery rate in the District and will be extremely challenging for the house building industry to deliver. The total level of housing provision in West Oxfordshire in the period up to 2031 will therefore be 15,950 homes. This comprises 13,200 homes in the period 2011 - 2031 to meet West Oxfordshire’s own identified housing needs and a further 2,750 homes in the period 2021 - 2031 to assist with the unmet housing needs of Oxford City.

We fully support this modification to the plan, we agree that adopting an approach to housing need from the joint assessment is the correct approach and complies with the duty to cooperate, as set out by localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. We also consider that the changes to accommodate an increased level of housing need, in line with the partial update of SHMA provides a robust evidence base that is legally compliant, justified and sound.

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<td>1877</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
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SHMA mid-point. Therefore, there is a substantial unmet need arising from the City which should be addressed at the earliest opportunity.

Whilst delaying addressing the City's unmet need until 2021 may reflect the work undertaken by the Oxfordshire Growth Board, the fact that this is consistent with West Oxfordshire's aspirational delivery trajectory for North Eynsham is not a justification to support this approach. The non-delivery in the period to 2021 at Eynsham for Oxford's unmet needs underlines the need for the Council to augment its housing land supply to identify and allocate additional land for housing in the short term to meet housing needs in the first half of the plan period. This is especially important given the significant shortfall of 1,836 homes (the equivalent to a 23/4 year shortfall against the SHMA), the very serious affordability concerns in the district (house prices 10 times lowest incomes) and in light of the Inspector's preliminary findings that it was his initial view that unmet need would need to be taken into account in calculating the 5-year land supply (Paragraph 7.6 (IN015)). A consequential change to MM23 Paragraph 5.22 is required to delete this additional text which refers to taking Eynsham into account for land supply purposes from 2021 onwards. The change is necessary to ensure that the plan is deliverable and effective.

Notwithstanding our concern regarding the Council's approach to only addressing unmet needs from the City of Oxford post 2021, the expectation that North Eynsham will deliver 220 dwellings per annum over a 10-year period is both optimistic and unrealistic. Housing delivery rates at Bicester Eco-Town do not support this, and the infrastructure delivery problems with the Northern Gateway (allocated in 2010, followed by an AAP, and now 11 years in the pipeline since inception) also suggest caution is merited. More sites (e.g. North Carterton) will make it more likely that delivery targets are achieved. In contrast, with the status quo, it is highly likely that North Eynsham will continue to deliver homes beyond the plan period. Whilst that in itself is not of concern, this underscores that it is unlikely to yield the number of homes within the plan period as claimed by the Council. The recent NLP report on housing delivery in November 20164 confirms that the average planning approval period for sites of 2,000 or more dwellings is 5 years and the average annual build out rate for sites of 2,000 or more dwellings is 161dpa: This reflects the limits to the number of sales outlets possible on a site, and overall market absorption rates (hence reinforcing the fact that a series of medium sites is better than a single large site). Given the proximity of West Eynsham to the North Eynsham proposal (in a village with a population of 4,648 according to the Census, 2011), this is likely to affect the rate of delivery overall in terms of local market competition/saturation. We consider that Eynsham is unlikely to yield development completions in 2021 given the need for the planning approval process, including an Area Action Plan prior to a planning application and recognition of a delivery rate of 160dpa and a start in 2022 (at the earliest) (the site is unlikely to deliver completions in its first calendar year) and the site will only deliver up to 1,440 homes in the plan period: 760 less than assumed by the Council. The change is necessary to ensure that the plan is deliverable and effective.

Objection is raised to MM23 (Paragraphs 5.21a and 5.21b) with reference to the proposed allocations at Woodstock, Burford and Charlbury (see representations below).

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<td>c/o Barton Willmore</td>
<td>1880</td>
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Main Modification 22/23/24 (Unsound)

The consortium supports the housing requirement of 660 homes per year as identified in the Oxfordshire Strategic Housing Market Assessment (SHMA) which was published in April 2014.

The Oxfordshire Growth Board, where all Oxfordshire Districts are represented has agreed to meet Oxford’s unmet housing need and the report published in September 2016 sets out the apportionment of need to each Council. The unmet housing need apportioned to West Oxfordshire is 2,750 homes. The consortium supports the Council’s agreement that it will deliver the agreed proportion of Oxford City’s unmet need of 2,750 homes. The delivery of the unmet need between 2011 and 2031 is not supported. On the basis that we are already five years into the SHMA period (2011-2016) 688 homes should have already been delivered as part of Oxford’s unmet need.

It should also be noted that within the report published by the Oxfordshire Growth Board, ‘A Countywide Approach to Meeting the Unmet Housing need for Oxford states the following:

One critical matter to recognise is that the assessment of the spatial options included recognition that deliverability of allocated sites was considered on a comparable basis between the different Districts, with an assumed start date of 2021 for the commencement of development after the adoption of the respective Local Plan review or Local Plan update/refresh. This assumption does not preclude earlier delivery, but does recognise the complexity of the issues being considered and has sought to factor in reasonable lead times to enable options to come forward and to be fully considered through the Local Plan process.

It is recognised that Oxford City’s unmet need apportioned to West Oxfordshire of 2,750 homes will be delivered through a strategic urban extension to the west of Eynsham and a new Garden Village to the north of the A40 near Eynsham. The New Garden Village at Eynsham is proposed for at least 2,200 homes. The consortium believes that it is overly optimistic to assume commencement of development within 2021 given the complexity of the site in terms of land assembly and associated infrastructure requirements. It is also recognised that an Area Action plan is to be drawn up for the site, which from our experience can take up to two years to produce.

In paragraph 5.22, the Council states that the garden Village proposal (2,750 homes) will treat the provision for 2,750 homes separately from the West Oxfordshire’s housing requirement. The Garden Village should not be treated as its own housing market area, there is no justification for treating the Garden Village as its own entity with its own five year housing land supply calculation. There is also no justification as to why the unmet needs of Oxford City are to be delivered post 2021, the housing need for West Oxfordshire is from 2011 and this should be dealt with imminently. Concern is raised that a five year housing land supply will not be met upon the Plan’s adoption.

Modifications to Policy H1 set out that provision for housing in the district will be based on the evidence contained in the 2014 SHMA, specifically the midpoint of the range 635-685 homes per annum i.e. 660
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<td>homes per annum. Taking this as the objectively assessed need for homes arising from the district defines a requirement over the plan period of 13,200 homes, as identified in paragraph 5.13. This approach is consistent with the University &amp; Colleges earlier representations on this matter.</td>
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<td>In addition, it is welcomed that the Modifications also allow for the provision of housing to contribute to the needs of Oxford City on the basis prescribed by the OGB i.e. 2,750 homes. This gives rise to a combined figure of 15,950 homes in the Local Plan period 2011-2031. The University &amp; Colleges agree with the principle of providing this level of new homes, albeit as a minimum threshold for the reasons set out in relation to MM4 i.e. that the OGB working understates the overall housing requirement for Oxford. Having defined this overall requirement across the Local Plan period, the University &amp; Colleges further comment that there is no need to make a distinction between the timing for delivery of the West Oxfordshire housing requirement and that for Oxford as specified in the last sentence of paragraph 5.15 and this text should therefore be deleted.</td>
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<td>We note that the objectively assessed need for West Oxfordshire is set at 660 dwellings per annum (13,200 homes in total) and we would agree that this will result in a significant increase in the rate of delivery within the District compared to the previously historic lower rates. We acknowledge the amended wording in relation to the unmet need from Oxford City and the rationale behind the apportionment allocated to West Oxfordshire to deliver. We agree that to meet this requirement that the delivery rates will need to increase substantially to 935 dwellings per annum from 2021 to 2031 to meet this need and that this will be extremely challenging for the District to deliver. As such, we believe that as many sustainable and unconstrained sites as possible should come forward for development at the earliest possible opportunity. As set out previously within these representations, we believe the site at Hailey offers a logical and sustainable location for growth within the village within close proximity to the Main Service Centre of Witney.</td>
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<td>We strongly object to the proposal for a separate land supply calculation for the 2,750 dwellings at Eynsham - to be taken account of in the period 2021-2031. There is nothing within the NPPF or the PPG to support this approach. The NPPF is clear that when dealing with need, it is the need of the Housing Market Area as whole which needs to be met. It is not appropriate to 'ring-fence' need in this manner.</td>
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<td>The plan is considered not to suitably address housing need despite the uplift in numbers. There has been insufficient development in the first five years (up to 2016) which is further increasing unmet need. The Council assert that the residual Liverpool method is most appropriate to address the 1,836-dwelling backlog (excluding Oxford City unmet need) from 2011-2016 rather than Sedgefield which is recognised in Planning Practice Guidance (PPG).</td>
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<td>However, in an appeal decision dated 26th July 2016 at Milton-under-Wychwood, the Inspector concluded that “Housing land supply in the District is less than 2 years. Such a shortfall must be regarded to be severe.” This was based on the 'Sedgefield' method of calculation and was not contested by the Council. Nine other recent Appeals this year in the District have concluded similar shortfalls and all those decisions by the Inspectorate have used the Sedgefield approach. There is no justification supplied for using the Liverpool method.</td>
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<td>Main Modification 29 (paragraphs 5.34b) confirms that West Oxfordshire will apply the Liverpool method in calculating the 5-year housing land supply which seeks to address the under-supply over the plan period rather than the immediate 5-year period. IN016 (The Inspectors Preliminary Findings – Part 2 para 2.15) stated that WODC need to have regard for National Guidance as the Liverpool method is not mentioned. Furthermore, the Houses of Parliament Briefing Paper Number 03741 dated 25 May 2016 Planning for</td>
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Housing states that Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period, thus the Sedgefield approach should be adopted. This is especially important given the severe shortfall of 1,836 homes, the serious affordability concerns in the local area (house prices 10 times lowest incomes).

Alongside this context of a severe shortfall in housing delivery, the report of the Oxfordshire Growth Board Post SHMA Strategic Work Programme report2 states that:

"133) The Programme is not seeking to allocate or release sites, but has at a high level and using a common basis, through the work streams; identify the evidence of each district’s ability to absorb additional growth to meet a share of Oxford’s unmet need. It will be for each of the districts through their normal Local Plan processes to allocate sites sufficient to meet their proposed share of Oxford’s unmet need under the requirements of the Duty to Co-operate.

134) It is also important to note that the yield figures for each area of search represent estimated housing numbers to be delivered by 2031 – total capacities at a number of these sites may change through local assessment as part of the more detailed Local Plan process, taking a wider range of planning factors into account, including the potential to deliver further housing beyond 2031."

MM22 Paragraph 5.17 asserts that the delivery of unmet Oxford City housing need at Eynsham will be delivered in the period 2021 to 2031 – which would require delivery of 220 dwellings per annum from a standing start in 2021: itself highly optimistic – rather than address unmet needs also within the first 5 years of the plan period. Whilst it is not disputed that Eynsham will not deliver prior to 2021, this underlines the need for the Council to augment its housing land supply to identify and allocate additional land for housing in the short term to meet housing needs in the first half of the plan period. This is especially important given the significant shortfall of 1,836 homes, the serious affordability concerns in the local area (house prices 10 times lowest incomes) and considering the Inspector’s preliminary findings that it was his initial view that unmet need would need to be considered in calculating the 5-year land supply (Paragraph 7.6 (IN015)).

Instead the Council’s Housing Land Supply Position Statement October 2016 simply indicates that Eynsham will ‘kick in’ from 2021 onwards as ‘agreed’ through the joint work at the Growth Board: such a view is not supported by the statement above from the September 2016 OGB report which emphasises the sovereign nature of Local Plans in identifying land to address unmet need. Rather than the response to delivery new homes to meet unmet needs ‘kicking in’ in 2021, this should be seen as ‘kicking the can down the road’. Unmet need, is, by definition, unmet.

It is counter intuitive for the Council to hold the view that the present day need for housing should be addressed in 5 years’ time or beyond. The Inspector’s Preliminary Findings (IN015) confirmed that if the Council failed to consider the implications of unmet housing needs the plan would be out of date before it can be adopted. The inescapable conclusion to this is that unmet housing needs should begin to be addressed at the time of adoption of this plan: arguably now. Were that not the case, logically an early review which gives time to consider and then respond to unmet needs would be appropriate, which it is evidently not.

The Vale of White Horse Local Plan, recently adopted, commits to allocating sites to contribute towards Oxford’s unmet housing need within the Local Plan 2031: Part 2, to be submitted to the Secretary of State, within two years of adoption of the Local Plan 2031: Part 1 - i.e. by December 2018: otherwise the unmet housing needs from Oxford City will become part of its housing land supply requirement. West Oxfordshire’s
approach to this issue is therefore wholly contradictory: the timing of its plan enables the Council to seize the
topportunity to deliver new homes to meet unmet housing needs from the City of Oxford, yet to put this off
until after 2021 will simply fail those who are presently in need of a new home. One cannot meet today's
needs tomorrow.

Furthermore, it is considered a key concern that there is too high a reliance on development which will
deliver after 2021 within the plan as a whole. The Council's Housing Land Supply Position Statement October
2016 indicates only 1,035 homes out of 8,169 dwellings on proposed allocation sites in the draft Plan will
occur prior to 2021: that is a paltry 12.6% or 207dpa. This will only address a little over half of the current
backlog let alone what is needed going forward. This extreme low delivery for the first 10 years of the plan
risks exacerbating affordability challenges district wide and places further stress on housing need.

When drilling down into the detail, it is proposed that the Witney sub-area (which incorporates Hailey) will
provide 4,400 homes. This is made up from proposed allocations and additional sustainable sites which come
forward and are available for development. It is also noted that additional sites may be allocated through
Neighbourhood Plans to increase the housing supply over and above that which has been identified and
planned for in the Local Plan. However, the Witney sub-area policy references windfall sites as being a potential
source of supply and attributes a specific number to these. This is not the same as sites being allocated through the Neighbourhood Plan. To restrict such a source of supply solely to potential Neighbourhood Plan sites is engaging a restriction on development and treating windfall sites as engaging a prematurity argument in seeking to come forward in advance of a Neighbourhood Plan. This is not in accordance with the NPPF. Furthermore, the policy as currently drafted means that were the villages not to develop Neighbourhood Plans, then there is no way of this element of the supply being delivered. We consider it should be clarified that the 8th paragraph should be amended to read:

Provision for new housing will also be made in the remainder of each sub-area at appropriate village
locations.

Given the confusion which exists between this policy and the respective sub-area policies, it is considered
that the third paragraph from the end should also be deleted as again it references additional sites coming
forward through Neighbourhood Plans only.

Main Modification 24, Policy H1, relates to the distribution of housing which is supported by a revised
Sustainability Appraisal (SA). We consider that there needs to be reconsideration of a further uplift in housing
in the Burford - Charlbury sub area (proposed housing requirement increase of 20% from 800 to 1,000
homes). Paragraph 116 of the NPPF clearly states that exceptional circumstances must be demonstrated to
justify allowing major development in the AONB. This paragraph states that consideration of such applications should include an assessment of the need for the development and its impact on 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 and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area: however, that is not a reason to increase housing within the sub area. The draft plan is not consistent with national policy and has not been justified with regard to reasonable alternatives which exist to deliver development outwith the AONB, nor is it deliverable and effective in terms of proposed sites.

MM778  Kier Group  Kier Group  -  Kier Group  2109  > SECTION 5 - PROVIDING NEW
Strong objections are raised in respect of this Main Modification. Particular objections are raised in respect of
the level of unmet need from Oxford City being accommodated within the District. Paragraph 5.13 of the Plan
sets out that a working assumption of 15,000 homes has been agreed by the Oxfordshire Authority’s as
representing the quantum of Oxford’s unmet housing need which must be accommodated elsewhere within the Oxfordshire Housing Market Area. However, the actual unmet need as set out within the SHMA is a range of between 15,000 – 18,000 homes. The District have applied a midpoint in applying the SHMA to the District’s own housing need and in the interest of consistency the same approach should be taken in respect of Oxford City’s housing needs.

Furthermore, Paragraph 5.14 states that it has been agreed that West Oxfordshire will accommodate 2,750 homes in the period 2021 – 2031. This equates to 935 dwellings per annum when added to the District’s own housing requirements however this excludes past backlogs.

It is not considered that the 2,750 homes is an agreed, reasonable and proportionate division of Oxford City’s needs given that between 15,000 and 18,000 homes are to be distributed across the four Oxfordshire Districts.

In addition, if the annual housing requirement (the District’s own housing needs together with Oxford City’s needs) do not include for past backlog, any calculation of housing land supply will need to factor in the backlog and due consideration will need to be given as to whether a 5% or 20% buffer should be applied on the basis of persistent underperformance.

Furthermore, as drafted the Plan does not reflect the latest position within the wider Strategic Housing Market Area in the context of the Duty to Cooperate. A Memorandum of Cooperation exists between all of the Oxfordshire Authorities in the context of having to meet the needs of Oxford City which cannot be accommodated within the city boundary. The Oxfordshire Growth Board have been tasked with identifying housing needs in Oxfordshire and then agreeing distribution across the authorities. The Plan for West Oxfordshire has been drafted on the basis of taking 2,750 houses in accordance with the Memorandum of Cooperation however South Oxfordshire have not agreed to their proportion of housing as confirmed at the Oxfordshire Growth Board meeting on 27th September 2016.

This is significant and goes to the heart of soundness for two key reasons:

Firstly, the Duty to Cooperate cannot be said to be met when one of the parties with whom West Oxfordshire are seeking to cooperate with are not in agreement on the strategy for distributing unmet housing need from Oxford City. This in itself indicates that the Plan for West Oxfordshire cannot be sound; and

In terms of housing numbers, South Oxfordshire were recommended as part of the Duty to Cooperate to accommodate 4,950 houses from Oxford City. This compares with 4,400 houses for Cherwell District, 2,200 for the Vale of White Horse and 2,750 houses in respect of West Oxfordshire. Thus, it can be seen that South Oxfordshire were proposed to accommodate the greatest proportion of Oxford City’s unmet housing need and therefore the scale of the issue that has now arisen given that South Oxfordshire have not agreed to take these housing numbers is far greater than had the situation arisen in Cherwell District, Vale of White Horse District or West Oxfordshire District.

The consequence is that objectively assessed housing need are not being met in the housing market area until such time as either South Oxfordshire reverse their position and accept 4,950 houses arising from Oxford City; or the remaining authorities agree to take additional housing to reduce the amount that South Oxfordshire have to accommodate, to such a level that South Oxfordshire are prepared to agree to the housing numbers to be delivered in their administrative boundary.
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<td>mr and dr Chapple</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>There is no resolution to this matter and no indication from the Oxfordshire Growth Board Meeting of 27th September 2016 as to the extent of housing from Oxford City that South Oxfordshire District are prepared to accommodate. There is no alternative strategy available to the local authorities in Oxfordshire and no easy solution. Such are the implications arising from the wider Housing Market Area it is recommended that further work on the West Oxfordshire Plan, including progressing further with the Examination be put on hold pending resolution of these key issues at the heart of Oxfordshire and the West Oxfordshire Plan.</td>
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<td>2162</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>At paragraph 5.5 of the Inspector’s Preliminary Findings Part 1, it is stated that ‘the SHMA’s recommended figure of a need for 274 affordable dwellings per annum is justified for the period 2013-2031’. The SHMA indicates (Table 89) that to meet the objectively assessed affordable housing need 685 dwellings per annum should be planned for over the plan period. Main modifications (Main 22) indicates that the ‘mid-point figure is 660 homes per year and this is defined as the objectively assessed need’. Main modifications (Main 24) to Policy H1 state that, utilising the mid-point figure of 660 homes per year, provision will be made for 13,200 homes to meet West Oxfordshire’s identified housing need and a further 2,750 homes to meet Oxford City’s housing need. At paragraph 5.11 of the Inspector’s Preliminary Findings Part 1, the Inspector raises concerns that an uplift in market housing has not been considered to meet the affordable housing need set out within the SHMA. It is reasonable to conclude the vast majority of affordable housing delivery will occur as a proportion of open-market schemes and is therefore extremely dependent for its delivery upon market housing being developed. The SHMA Update, dated November 2016, indicates at paragraph 6.6 that the total net need for affordable housing is 275 dwellings per annum. Furthermore, paragraph 6.7 concludes the Council should consider an appropriate uplift to address affordable housing need. Paragraph 159 of the NPPF clearly states that ‘Local planning authorities should have a clear understanding of housing needs in their area. They should: ... address the need for all types of housing, including affordable housing. The WOLP does not provide for an uplift beyond that of the SHMA mid-point of 660 dwellings per annum. The strategic development areas are likely to provide less than the affordable housing policy requirements due to significant costs associated with the delivery of infrastructure. The Planning Practice Guidance advises at paragraph 029 (Ref ID: 2a-029-20140306) how plan makers should use the results of the affordable needs assessment: ‘The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2186</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>Overall Housing Number in the Plan</td>
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<td>We support Main Modifications (MM) 22, 24 and 30 which propose that the Local Plan should provide for at least 15,950 homes in the period 2011-31, including 13,200 to meet the district’s needs and 2,750 homes as West Oxfordshire’s contribution to providing for Oxford’s unmet housing need.</td>
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<td>Soundness Reason: Positively Prepared</td>
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<td>WODC propose to use the figure of 660 homes pa as their OAN which is the mid-point figure in the SHMA. This would be sufficient to support forecast economic growth and would help to meet affordable housing needs.</td>
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<td>(For information we do not accept Peter Brett’s rebuttal to our criticisms of the methodology used in the Oxfordshire Strategic Housing Market Assessment Partial Update. It remains our view that at least 598 homes p.a. are needed to meet the labour force requirement. It is not clear how WODC justify adopting the SHMA figure of 660pa as their OAN – presumably they have decided to uplift the number of homes Peter Brett identified as necessary to support economic growth to ensure new housing makes a significant contribution to the district’s identified affordable housing needs).</td>
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<td>The inclusion of 2,750 homes for Oxford's unmet need is in line with the Growth Board's apportionment of unmet need and reflects the terms of the Growth Board Memorandum of Cooperation1 signed by five of the Oxfordshire councils including WODC and the County Council. The figure has been tested at a high level through the post SHMA process and shown to be deliverable.</td>
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<td>Delivery period for Oxford's Unmet Need sites and the 5 year housing supply calculation</td>
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<td>We support MMs 22, 29 and 30 which set out WODC’s proposal to use the Liverpool method to calculate their 5yr housing land supply figure and that sites for unmet need are unlikely to deliver housing until 2021 and therefore will not form part of the housing land supply calculation until 2021 onwards.</td>
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<td>Soundness Reason: Effective</td>
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<td>Use of the Liverpool method which spreads housing backlog across the whole plan period is a realistic approach, given the ambitious district OAN figure of 660pa and the scale of housing backlog in West Oxfordshire.</td>
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<td>The Growth Board apportionment is based on a common assumed start date of 2021 for the commencement of development. This assumption doesn't preclude earlier delivery, but does recognise the complexity of the issues which need to be considered and factors in reasonable lead times to enable options to come forward and to be fully considered through the Local Plan and development management process.</td>
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<tr>
<td>MM21</td>
<td></td>
<td>Thoughtful</td>
<td>Mr</td>
<td>Reese</td>
<td>27</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>The entire document is based on a false premise that West Oxfordshire, and indeed the whole of Oxfordshire needs more housing to support growth and development. Oxford is a globally famous city and had no issue with attracting investment. In a world increasingly dominated by the internet and nano-technology, things will be more remote and smaller. There is simply no justification for the housing targets, and absolutely no support for growth from local people. The targets are imposed on the region and are not welcome.</td>
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<tr>
<td>MM23</td>
<td></td>
<td>Alan Burrows</td>
<td>Mr</td>
<td>Burrows</td>
<td>35</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>It seems that Oxford’s proposed answer to ‘desperately needed affordable housing’ (in parentheses, as I’m not quite sure what that means) is to build on and destroy green belt land in West Oxfordshire. If so, it will certainly keep houses in Oxford itself unaffordable and create massive problems for the small towns and villages where affordable housing will be built. At the moment we are told there is a housing shortage, perhaps in 10 years time we’ll be told we have a housing glut in West Oxfordshire (the transport infrastructure making a commute to Oxford impractical) and a ‘desperate need for farmland to cut down on imported food’ - sadly lost due to short sighted housing policies. For those with long memories may recall that both Abingdon and Whitney were once rail connected to Oxford. They too, weren’t needed at the time.</td>
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<tr>
<td>MM25</td>
<td>CPRE</td>
<td>Gareth Hammond</td>
<td>Mr</td>
<td>Hammond</td>
<td>45</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>Ludicrous. Think of a number, then double it. All the reasons why previous projections were overblown - based on spurious, speculative assumptions of economic growth - have been struck out to be replaced by even more outrageous ones.</td>
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<tr>
<td>MM251</td>
<td></td>
<td>Andrew Garbutt</td>
<td>Mr</td>
<td>Garbutt</td>
<td>461</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>The Objectively Assessed Need (OAN) We remain of the view that the proposed housing target given in clause 5.15 &amp; Policies H1 &amp; H2 is too high for reasons outlined at previous stages of the development of the Draft Local Plan. As the analysis previously provided has not been considered in setting the target, we recognise that there is no value in repeating the detail. We simply have to accept that there is currently a political will to build a significant quantum of new houses. In our view, it is unlikely that the affordable housing crisis, which is cited as one of the key drivers for growth, will not be resolved in this way. Instead, this initiative is more about boosting the economy (although it will only ever be a temporary fix) and therefore, over-estimates of the housing need are considered positive and the Development Sector is being allowed a free reign. The harm associated with high growth is being ignored. The sustainability of the high growth itself is also not being considered, nor the potential for market collapse, as has occurred in Ireland and other countries with similar pro-development policies. In that respect, we believe that the National Planning Policy Framework (NPPF) is not working, but it is a reality that we have no choice but to live with at present. As previously outlined, the SHMA relies on a series of assumptions that all augment the</td>
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housing need and when compounded, the upwards effect is significant. The model doesn’t stack up, as for example the falling occupancy assumption does not match the falling economic activity assumption, as the latter will worsen affordability and prosperity. The mix of housing proposed does not match the assumed occupancy. The expected economic growth at the root of the SHMA, relies principally on increased jobs in the service sector, which in turn relies on population growth. Therefore, the SHMA is to a great extent reliant on a circular argument. The jobs growth may well not materialise to the extent hoped and no consideration has been given to what would happen then.

The SHMA is often considered as an absolute truth, but in reality it presents one scenario for the future. In our view, it’s not at all a likely outcome. More and more people are seeing past the propaganda on desperate housing need and interrogating the data. They are realising that developers and big business are behind the growth plans for their own gain and that the situation with regard to affordable housing (i.e. the real need) will most likely not be resolved.

The SHMA conclusion to build 40% more houses in Oxfordshire as a whole, than have ever been built before is unsustainable, as is the plan to build 15,950 homes in West Oxfordshire.

It must be noted in particular that in this District we have too many homes for the number of jobs. Therefore, if jobs are to be created, it makes sense to limit growth and look first to the existing population, many of whom are forced to out-commute.

We were encouraged by Peter Brett Associates (PBA) suggesting a compromise target of 568 homes per annum, based on a more accurate number of working age people. However, PBA indicates though that this would not provide sufficient affordable housing, should WODC wish to cater for every possible need and suggests no solution. We assume this is why WODC has reverted to the SHMA figure. However, we feel that developers cannot be relied upon to provide sufficient affordable housing full-stop and placing this important requirement in their hands is deeply flawed.

In any event, this new study by PBA is still attempting to meet the growth plans initiated by OxLEP, which are also behind the SHMA and have not been drawn up democratically. PBA acknowledges the number of jobs expected is not converted to a full-time equivalent (FTE) number and that past high (and undesirable) out-commuting trends are carried forward, which are issues we have raised previously. The distortion in doing so is acknowledged, although under-played by PBA, but no associated adjustments have been made. Had these issues been investigated further, PBA’s target would have been significantly lower.

After all, in 2011, there were 14% more jobs than employees in the County, indicating that a significant number of people have more than one job. Therefore, the 88,000 jobs expected, could reasonably be reduced by a factor of 1.14 to calculate the number of workers needed, which is a significant reduction.

Also, thousands of people have no choice but to out-commute from West Oxfordshire to work because we have too few jobs for the number of residents. Tellingly, more people outcommute now than the number of workers required to fill the expected number of new jobs created in the Plan Period, so we have the solution within the District already. Therefore, any jobs growth should be used to reduce the out-commuting ratio, rather than be accompanied by pro-rata population growth and a perpetuation of the out-commuting ratio amongst the new population. That’s unsustainable and for sure, we should not allow for 18% of the future in-migrating workers to out-commute. What would be the point of bring them to live here, only to work elsewhere?
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<td>MM357</td>
<td>Tony Bovey</td>
<td>Mr Bovey</td>
<td>667</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>5.8, see first comment on the nature of Growth Board, SMHA, public challenge and public participation (not passive consultation).</td>
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<td>The aggregate county dwelling targets are unsustainable: the local housing industry has never reached these annual figures, and never will, because of capacity problems and the nature of the house building (house builders withhold supply to sustain demand, and hence prices, through &quot;managed&quot; release of new housing stock).</td>
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<td>MM363</td>
<td>Oxford City Council</td>
<td>Ms Dell</td>
<td>676</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
<td>Housing Target</td>
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<td>West Oxfordshire’s revised housing target has been increased from 10,500 to 15,950. This does now appear to fully meet their OAN target from the SHMA together with the portion of Oxford’s unmet housing need (2,750) to 2031 agreed at the Growth Board Meeting in September 2016.</td>
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<td>This approach does properly reflect the success of the joint working arrangements between the City Council and West Oxfordshire. Engagement between the two Councils has continued through the bilateral joint work. This serves to show how West Oxfordshire are fully meeting their ‘duty to co-operate’ with the City Council.</td>
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<td>Support: Oxford City Council therefore wish to support in principle Main Mod 22 and paragraphs 5.8 and 5.12 that clearly show that the revised housing targets have been met through the ‘joint working arrangements’ carried out in the SHMA and their continued cooperation that has helped to set the housing target for West Oxfordshire and identify the proportion of Oxford’s ‘unmet’ housing need that will be met by the delivery of</td>
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<td>MM369</td>
<td>Cherwell District Council</td>
<td>David Peckford</td>
<td>Mr Peckford</td>
<td>696</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
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<tr>
<td>MM36</td>
<td>Richard Munro</td>
<td>Mr Munro</td>
<td>75</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
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<td>MM385</td>
<td>Combe Parish Council</td>
<td>Combe Parish Council</td>
<td>Mrs Sharpe</td>
<td>828</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 22</td>
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**Cherwell District Council**

David Peckford

Objection: The principle concern however is deliverability. There does seem to be a real challenge ahead for West Oxfordshire to be able to deliver the number of housing being proposed, based on past housing trends and delivery rates.

The Plan makes reference to an Area Action Plan (AAP) being prepared for these two new strategic sites. Since this will be critical to the ‘front-loading’ of the process and indeed the delivery of these sites, the Local Plan should include a clear statement of intent backed up by a timetable for its completion.

Thank you for your email dated 11 November 2016 consulting Cherwell District Council on your Proposed Modifications to your Submission Local Plan. This letter comprises an officer response to the consultation and our comments are restricted to those matters that are of particular interest to Cherwell district.

We have previously recorded our history of working cooperatively and collaboratively on planning issues of strategic and mutual interest through the Oxfordshire Planning Policy Officers group (OPPO), the Oxfordshire Growth Board (OGB), the Spatial Planning and Infrastructure Partnership (SPIP) which preceded the OGB, and joint working on specific projects including the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA), Strategic Flood Risk Assessment and assessing the housing needs of the travelling communities.

More specifically, we have found West Oxfordshire’s contribution to countywide cooperative working over, approximately, the past 18 months to be constructive and solution-driven. We welcome the Proposed Modifications to increase West Oxfordshire’s housing target (2011-2031) to meet its own needs from 10,500 homes (525 per annum) to 13,200 (660 per annum) and to incorporate the apportionment of 2,750 homes to contribute in meeting Oxford’s unmet housing needs as was agreed by the Oxfordshire Growth Board on 26 September 2016.

We know of no reason to consider that your Proposed Modifications have not been prepared in accordance with the Duty to Cooperate and we are not aware of any legal or procedural failings from this Council’s perspective. We have of course met and spoken at officer level to discuss respective plan-making and strategic and cross-boundary issues.

**Combe Parish Council**

Combe Parish Council recognises the need to secure the swift implementation of the West Oxfordshire Local Plan 2031 given growing pressures for private development in the District. The Council wishes, however, to register its concerns over the proposed modifications to the Plan as follows:

1. the increase in the overall housing requirement to 15,950 homes [MAIN22, Paras 5.8-5.15]

We reject the premises upon which the increased housing requirement is founded. Pre-Brexit targets and projected housing need (SHMA 2014) have been accepted without revision, despite a change in economic and political climate. We believe that greater economic uncertainty calls these outdated projections into question. There is also an assumption that continuing economic growth in the city of Oxford will take place, and is indeed desirable. Investment in other centres for growth within and beyond Oxfordshire (as would be
consistent, for example, with government support for the Northern Powerhouse) should be considered.

In light of the above, we question and object to the increased requirement to meet the City of Oxford’s unmet housing need and the scale of projected demand for housing in West Oxfordshire, which will bring the gradual erosion of the AONB. We support the stated priority for affordable housing, but question the ability to deliver truly affordable options for vulnerable groups in the inflated West Oxfordshire housing market.

In sum, the proposal to increase the housing requirement to 15,950 homes does not appear to have fully responded to the concerns of local residents about scales of development raised in the earlier consultation, and has not justified the adjusted projected housing demand satisfactorily.

3. OVERALL STRATEGY AND PROVIDING NEW HOMES
Policy OS2 – Locating Development in the Right Places (MM16)

3.1 The Submission Draft Local Plan (May 2015) contains core objectives to help guide the development of the District. Core objectives C01, C02 and C04 place significant emphasis on locating development in appropriate locations where it can meet local needs and reduce the need to travel. These core objectives are taken forward into a defined settlement hierarchy and a development strategy set out by Policy OS2 – Locating Development in the Right Places, which is effectively the plans spatial distribution policy. Policy OS2 is therefore clearly a major policy which goes to the very heart of the Local Plan. Policy OS2 is subject to a major modification (Modification 16).

3.2 Our principle issue with the revised policy is the extent to which it has been modified which results in a very different plan to what was submitted. We have raised a number of issues with regard to the manner in which this policy has been modified from a procedural perspective in Section 2.

3.3 Regarding the revised Policy OS2 itself, we continue to support the identification of the three main service towns as the principle focus for development, including Chipping Norton. However, it is now clear that Eynsham will effectively become a settlement that will have a higher population than Chipping Norton and Carterton. In effect, it will become the second largest settlement in the District. We do not believe this is consistent with the long-established ‘three towns’ strategy and this therefore has implications for the Local Plan as a whole.

3.4 Whilst we note that a wider dispersed option was tested through the SA, there does not appear to have been an option that looked specifically at dispersed growth option in the eastern part of the district, which could have considered For example, an alternative option to targeting growth towards the settlement of Eynsham could have been to consider additional growth spread across the villages to the Eynsham-Woodstock sub area of the District and perhaps areas to the east of Witney, Buckdington, Hailey, Finstock, Stonfield and Charlbury. Dispersed growth across these settlements would appear to be a potential option to meet Oxford’s unmet needs.

3.5 ASL support the recognition that further allocations may need to be made through Neighbourhood Plans in relation to villages but note that should it become evident that the Local Plan is not delivering, there will need to be sufficient policies and triggers within this Local Plan to require an early review, as the burden to meet needs cannot simply be left to local communities.

Policy H1 – Amount and Distribution of Housing (MM21 to MM24)

3.6 Regarding MM21, we do not dispute the position that the level of growth needs to considered against associated impacts, but we are not convinced that ‘growth needs to be managed in order to prevent
significant change to the intrinsic character of the District’ is the correct term to use here as the barometer to which impact will be considered. Indeed, the modified Plan proposes significant change to the character of some areas (i.e. Eynsham). The test has to be if the meeting needs would significantly and demonstrably outweigh the benefits, as set out at paragraph 14 of the NPPF.

3.7 With regard to the overall quantum of housing now being proposed as part of MM22, we can confirm that we support the evidence base conclusions on housing requirements, which have been placed within the Modified Policy H1 (MM24). ASL support the 15,950 dwelling requirement overall, which comprises of 13,200 homes for West Oxfordshire and 2,750 homes for Oxford’s unmet needs that are now enshrined in this policy.

3.8 ASL do not take specific issue with the proposed distribution of new homes. Indeed, we support the requirement for the Chipping Norton sub area at 2,400 new homes over the plan period and notwithstanding our points regarding statutory requirements in relation to the preparation of a Local Plan (as set out in Section 2), we do not take particular issue with the spatial distribution that is being proposed, we just do not feel such a major change can be enveloped into the current process without serious risk of by-passing key requirements of the law when preparing a Local Plan. Put simply, we thing the changes have gone a step too far to be incorporated in to this plan as modifications post submission of the plan.

3.9 The increased housing requirement within each of the districts sub-areas is set out in Table 1 (ATTACHED). The housing requirement for the District has gone up by 51%, which has then led to significant changes to the spatial distribution of development.

3.10 The Eynsham-Woodstock sub-area requires 243% more homes that originally envisaged within the Submission Draft Local Plan, which perfectly highlights the substantial change to the distribution of development that is now being promoted.

3.11 Chipping Norton’s requirement has also increased by 50% and as noted above we support this as it brings it more in line with requirements for the other three main towns (whilst noting Chipping Norton is the smallest of the three towns). However, as noted in Section 2, in proposing this increase in housing numbers for the settlement, the Council have only considered one option for delivering this number of new homes through the SA by increasing the size of the Tank Farm Site (SDA).

3.12 We note the other areas have not increased as much and even in those instances, we note the SA has tested various site options for the increased growth.

3.13 In terms of other issues with the revised policy, we object to the notion that the Garden Village should be regarded as a free standing settlement. It isn’t and is clearly related and connected to Eynsham, with the site and urban boundaries adjoining and the entirety of the site falling within Eynsham Parish.

3.14 We continue to support the final paragraph in Policy H1 which confirms the Council will monitor development annually to ensure that the overall strategy is being delivered.
3.9 The Council’s policy approach of directing a ‘significant proportion’ of growth to these locations could be argued as being consistent with the SA assessment if the distinction between ‘most’/’significant proportion’ is interpreted as being essentially the same. However, as stated within other representations, the practical effect of the distinction is extremely wide, including as it does strategic scale allocations (individually and cumulatively) at Eynsham and Woodstock, in preference to any strategic allocation at Carterton.

3.10 Paragraph 5.21a characterises Woodstock as having a ‘relatively’ good range of services and facilities, although it is not clear what this is relative to. It is also deemed able to accommodate a ‘reasonable’ scale of development.

3.11 It is interesting to consider what ‘reasonable’ might mean in this context, having regard to criteria such as the size of the settlement; its capacity for absorbing development without compromising its character as a town typical of the Cotswold Vernacular (a defining characteristic of the District that paragraph 5.1 of the Local Plan advises must be protected); and having clear regard to its importance in terms of designated and non-designated heritage assets, both within the settlement itself and adjoining in the case of the Blenheim Palace and Park WHS. There is an absence of analysis within the evidence base as to what impact development might have on the significance of the latter.

3.12 The Parish of Woodstock comprises of 1,514 dwellings7, which includes all dwellings within the built up limits of the town and outlying properties within the parish. On this basis the development now proposed within the Local Plan modifications would see a c.45% increase in the number of dwellings and population within the settlement. This, by any estimation, cannot be considered ‘reasonable’; a near 50% increase in the size of an historic settlement located adjoining a WHS does not suggest good planning or the ‘effective management of growth’ with the objective of preventing significant change to locations that contribute to the intrinsic character of the District.8

3.13 What is more since WHS status was assigned to Blenheim Palace in 1987 the nature of change at Woodstock has been limited: The 1991 Census showed that all residents in Woodstock numbered 2,768; by the 2001 Census this had risen to 2,924 residents and in 2011 3,1009. Using an average household size of 2.12 derived from the summary material, it is possible to estimate the number of new households formed over this 20 year period by dividing the population growth by the average household size. This indicates that 157 new households formed in Woodstock in the period between the Censuses. This is a far more appropriate scale of growth, and is one that would reflect the position of the town in the settlement hierarchy and would not be disproportionate compared to the level of growth proposed at the other Rural Service Centres. It would also better reflect the important historic sensitivity of the settlement itself and its role within the setting of the WHS.

3.14 The inconsistencies in the Proposed Modifications are stark and incoherent having regard to the SA: Large scale housing development(s) are being directed towards second tier settlements, in contradiction of the chosen spatial strategy and without having been subject to consistent and proper SA evaluation.

3.15 The Council’s approach to housing distribution within the Plan is unjustified having regard to the evidence base and is internally inconsistent. The strategy is considered to be unsound and is not supported by the evidence base.
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<td>MM61</td>
<td>NP Mr Pearce</td>
<td>150</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>Paragraph 5.20: The “strategic urban extension” to the west of Eynsham, including 550 homes for Oxford City, will lead to more commuting to Oxford and increased flood risk. Surely it is a mistake to build on either side of the Chil Brook (a “functional floodplain”, according to the 2016 SFRA Update Report). Presumably you will follow the advice of the Cherwell and West Oxfordshire Level 1 Strategic Flood Risk Assessment and carry out the “required” Level 3 Flood Risk Assessment before you do anything else?</td>
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<tr>
<td>MM3</td>
<td>Richard Andrews Mr Andrews</td>
<td>160</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>Comments made on behalf of Eynsham Parish Council. Para 5.20-21 and policy H1: unsound due to inadequate justification of assumptions about site capability and achievable build rates. There is much duplication between this section and Section 9.40a-c / policy EW1a so the comments are also very similar. Allocating 1000 houses to west Eynsham is too aggressive - the site may not be able to accommodate that many homes at all and building such a large number there takes away the opportunity to achieve good design and preserve the rural context of the village. In a sense this is recognised by describing the development as ‘urban’ which, as 1000 extra homes onto a 2000 dwelling village, it is! Conversely, allocating only 2200 homes to the Garden Village is unnecessarily unambitious to the point where the sustainability of the new settlement may be questionable as it will not to be able to fund the necessary infrastructure unless a higher build rate can be achieved. In the unprecedented situation of a an entirely new settlement, relying on past - very lacklustre - local build rates will always yield a poor outcome. We would prefer to see all 3200 new homes allocated to the Garden Village in the first instance with a plan - rather than just an aspiration - to achieve a fast build rate by working with financial and housing association partners. The west Eynsham site is capable of delivering 600 new homes with low risk. Its development should be planned along with the Garden Village as part of a single SDA/AAP to ensure proper co-ordination of road access, shared services and the correct combination of connectivity by foot and cycle. However, the west should be held as a reserve site so the main focus is on delivering homes and infrastructure in the Garden Village. It may not be necessary to develop to the west of Eynsham until the next local plan period begins in 2031. It should be noted that 237 new houses are already approved for the west of Eynsham and so the ‘local needs’ will be well catered for for some years ahead.</td>
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<tr>
<td>MM722</td>
<td>Graham Flint Mr Flint</td>
<td>1646</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>The proposal to remove Long Hanborough from the Rural Service Centres and designate it as a village is unsound for the following reasons: 1. Its long history as a Service Centre Long Hanborough has been designated as a Service Centre for a long time. It is designated as a Service Centre in the West Oxfordshire Local Plan 2001 - 2011 (Figure 5.2) and was proposed to be designated as a Rural Service Centre in the submission West Oxfordshire Local Plan 2031 (Table 4.1). The National Planning Policy Framework (NPPF) requires that ‘the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence,’ (para 182) and the Council has long accepted that there is sufficient evidence to justify the designation of Long Hanborough as a Rural Service Centre.</td>
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### 2. Wide range of services and facilities

There is ample evidence that Long Hanborough has a wide range of services and facilities and therefore merits its Rural Service Centre status. These include a new spacious doctors' surgery for which planning permission was obtained in July 2016 and which will be provided as part of the residential development on the land south of Witney Road granted planning permission under appeal ref: APP/D3125/W/15/3129767. The new doctors' surgery is required to be provided under conditions 15 & 16 of the permission within 2 years of commencement of the development and to remain in that specified use. This will replace the current cramped doctors' surgery, which is well below NHS England standards of provision for the population it serves, and not only improve facilities for existing residents, but also provide the capacity for the provision of more homes in Long Hanborough. Other services and facilities include a primary school; petrol station; churches; post office; two Co-op food stores; dental practice; playing fields; spacious village hall; nursery; beauty salon; two public houses; fish and chip shop; substantial employment estate (circa 10.72 hectares) and a mainline train station (the Cotswold Line).

### 3. Close relationship to the Oxford and Oxfordshire City Deal and the 'Knowledge Spine'

A key part of the case for Long Hanborough to remain as a Rural Service Centre is its close relationship to the City Deal. The Oxford and Oxfordshire City Deal is part of the Government’s initiative to devolve powers locally in exchange for local authorities taking on responsibility for creating economic growth in their areas. The Oxford and Oxfordshire City Deal aims to promote growth by maximising the existing educational, pharmaceutical and science assets in order to promote Oxford and Oxfordshire’s status as a prosperous economic area.

The City Deal is a cooperative venture, which will be delivered through the Oxford Local Enterprise Partnership (LEP) bringing together other bodies and institutions, including Oxford City Council, Cherwell District Council, South Oxfordshire District Council, Vale of the White Horse District Council, West Oxfordshire District Council, Oxfordshire County Council, Oxford Brookes University and Oxford University. The area of the City Deal is County wide.

The proposed development at Long Hanborough is very close to the 'Knowledge Spine' identified in the City Deal, which stretches from Science Vale, near Didcot to Bicester, with Oxford at its heart. Paragraph 9.5.11 of the Local Plan acknowledges this, stating that the proximity of the Eynsham-Woodstock sub-area to major employment growth areas 'present a diverse range of opportunities within close distance including within the Oxfordshire knowledge spine suggesting the Eynsham Woodstock area has a positive role to play in terms of economic development.' Two key proposed employment sites that are close to Long Hanborough, and which housing there would help to serve, are the Science Park at Begbroke, which Cherwell District Council has identified in its Local Plan 2011 - 2031 (adopted July 2015) policy Kidlington 1 for Accommodating High Value Employment Needs and the Northern Gateway, which adjoins the A44 at the northern edge of Oxford, which Oxford City Council has allocated in its Northern Gateway Area Action Plan (adopted July 2015) policy NG2 for up to 90,000 m2 of employment uses that directly relate to the knowledge economy and include science and technology; research; bio-technology; and spin off companies from the universities and hospitals.

The City Deal commits the participating local authorities to accelerate the delivery of 7,500 homes across the county; and recognizes that the provision of quality housing close to the employment areas is fundamental to the delivery of innovation led growth.

The importance of housing provision to the achievement of the objectives of the City Deal is emphasized in
the section on 'Planning for Development,' that states: 'The City Deal should enable further economic growth. However, this success has placed pressure on the local housing market. Oxford and Oxfordshire have overwhelming evidence that the lack of choice and availability of housing and affordable housing is a major barrier to growth. Oxford and other areas in the county are identified as among the least affordable locations in the country, and significantly ahead of London. The universities and businesses in the knowledge economy identify that housing is a significant barrier to the recruitment and retention of staff, including senior management and researchers. More housing is essential for the future of the knowledge economy in Oxford and Oxfordshire. City Deal partners recognise that a more strategic and ambitious approach towards housing growth is essential to the future of the knowledge economy in Oxford and Oxfordshire, and will ensure that the area continues to be a dynamic place to invest and work.

The proximity of Long Hanborough to the 'Growth Spine,' and its ability to contribute to the City Deal further emphasizes the importance of it continuing to be designated as a Rural Service Centre.

4. Recent Rail Improvements & Further Improvements Detailed in the Main Modifications will enhance Long Hanborough’s role as a Rural Service Centre

There is therefore absolutely no evidence to demonstrate that it should be downgraded to village status. In fact, the service centre role performed by Long Hanborough has improved in recent years due to the improvements that have taken place in the rail service with further improvements proposed.

The presence of the train station at Long Hanborough is virtually unique in West Oxfordshire. None of the three main settlements of Witney; Carterton and Chipping Norton has a train station and the only other service centre which has one is Charlbury, which is located within the Cotswolds Area of Outstanding Natural Beauty (AONB) where development is therefore constrained in accordance with the advice in the National Planning Policy Framework (paragraphs 115 - 116). At Long Hanborough there is a regular direct train service to Oxford, Didcot, Reading, Slough, London and Worcester, with the journey to Oxford only taking ten minutes. This is of particular significance, as paragraph 9.5.34 of the Submission Local plan acknowledges that the Eynsham/Woodstock sub area, within which Long Hanborough is located, has 'very strong linkages with Oxford, with a high proportion of residents working in the city and much of the economic activity forming part of the wider Oxford city region economy.'

The proposed main modification 66 reinforces the importance of the Hanborough train station with paragraph 7.57(a) stating that: ‘passenger growth on the Cotswold line has been significant with exceptional growth at Hanborough (up 239%).’ It states that 'There is the potential for further growth with the introduction of an hourly service in December 2018. New trains will bring increased capacity with additional seating and will also achieve faster journey times, with some services from Hanborough reaching London Paddington in 63 minutes. '

There are also proposals for further improvements with paragraph 7.57 (b) stating that:

'LTPI identifies a strategic aspiration to develop Hanborough Station as a transport hub to help reduce congestion on the A40 as part of an overall package of public transport measures. To fulfil its potential, the station will require a larger car park, footbridge and new platform so any trains extended from Oxford can terminate and turnaround. To fully realise the potential of the railway, further redoubling will be required at the eastern and western ends of the line, between Wolvercote Junction and Hanborough, and from west of Evesham towards Pershore. This would allow up to three trains per hour to Hanborough and/or Char/bury and two trains per hour between London and Worcester, with a journey time under two hours.'
These points are also reiterated in paragraph 9.5.16 which refers to Hanborough station as being ‘one of the District’s largest and most well-used stations. Car parking facilities have recently been expanded at Hanborough to improve capacity and there are aspirations for further station improvements,’ and then goes on to repeat the improvements outlined in paragraph 7.57 above.

Paragraph 9.5.34 also states that: ‘there is potential to develop Hanborough Station as a stronger transport interchange, with additional parking, and improved access from the south.’

These improvements will further improve the sustainability of Long Hanborough and mean that it is far more accessible by public transport, particularly to Oxford, than any other service centre in West Oxfordshire, apart from Charbury, which is in the AONB. This constant reiteration in the Main Modifications of the importance of Hanborough station and the further improvements planned for it, prove that Long Hanborough certainly merits its designation as a Rural Service Centre.

The proposed Main Modifications, however, go on to state in paragraph 7.57c that:

‘In light of the proposed improvements to Hanborough Station a key element of the proposed garden village to the north of Eynsham will be the provision of improved connectivity between the new settlement and the station particularly by bus and cycle.’

Given, that Long Hanborough is located adjoining the station there is already excellent connectivity with the train station, with a pedestrian and cycle path through the settlement providing access to it. It is also located closer to the station than the proposed garden village. With the recent and proposed improvements to the station it therefore clearly performs the role of an important transport hub and should retain its status as a Rural Service Centre.

5. Scoring in the West Oxfordshire Local Development Framework Settlement Sustainability Report (November 2016)

The Council has prepared a Settlement Sustainability Report (November 2016), which gives weighted and unweighted scores. In both Hanborough scores above all of the villages, scoring the same as the Rural Service Centre of Bampton and 2 points more than Bampton in the Weighted Score. However, Long Hanborough’s position as a Rural Service Centre is even more significant than this indicates as there are three different positive indicators for a bus service which are:

• Daytime bus service;
• Evening bus service;
• Bus service every 30 minutes

However, for the train there is only one score for a railway station in the parish. At Hanborough Station there is an evening train service, with the last train arriving at 23.02. The train also only takes 10 minutes from Oxford station, giving Hanborough a high level of accessibility, so the rail service clearly merits a higher score than the unweighted score of 1 or the weighted score of 2.

With regard to the weighted score, there is a strong argument that having a railway station in the parish
6. The Planning Inspector Philip Asquith who considered the appeal into the proposed residential development and doctors’ surgery on land south of Witney Road, Long Hanborough considered that Long Hanborough merited designation as a Rural Service Centre.

The Inspector who determined the planning appeal relating to land south of Witney Road, Long Hanborough, (APP/D3125/W/15/3129767 & 12/1234/P/OP) also considered Long Hanborough to merit the designation as a Rural Service Centre, stating that:

49. ‘Long Hanborough is one of the nine larger settlements in the district classified in the WOLP as Service Centres. These, by definition, have a good range of facilities, services and transport accessibility to support their immediate communities as well as neighbouring hinterlands. This is confirmed by the Council’s Settlement Sustainability Report, revised in December 2013. The village is also defined as one of six Rural Service Centres within the emerging Local Plan 2031. The Statement of Common Ground between the appellant and the Council notes that Long Hanborough is a suitable location to accommodate significant residential growth. There is a range of local services, including a small business park adjacent to the station, which allows a proportion of travel demand (alternative to the car) to be met locally.’

50. The village is only one of two settlements within the category of Main Towns and Rural Service Centres in the district to have a mainline station. The rail line provides direct services to London, Oxford, and Worcester. It is apparent that there is a commitment to the introduction of new trains with greater capacity, with a longer-term commitment to increase the number of trains from Long Hanborough to Oxford, cut journey times to London and undertake enhancements to the station’s facilities.’

Counter Arguments

There is therefore abundant evidence that Long Hanborough merits its Rural Service Centre designation.

There are two arguments against its designation which are the Council’s statement in paragraph 9.5.3a that:

‘Given the residential schemes of 169 homes and 50 homes recently approved, the limited role of the settlement and its landscape setting, it is only suitable for very modest levels of further development.’

The other being the argument made in the officers’ report to Council on the 26 October 2016, (paragraph 5.9), that the proposed designation of the West Oxfordshire Garden Village would mean that there would be too many Rural Service Centres in this part of Oxfordshire.

Neither of these arguments is considered to be a valid reason to remove Long Hanborough’s status as a Rural Service Centre. In the first place the Council itself is proposing in the main modifications to designate two additional sites at Long Hanborough for residential development, these being land at Myrtle Farm, Long Hanborough for 50 homes under Policy EW1 f and the other being land at Oliver’s Garage, Long Hanborough, for 25 dwellings under Policy EW1 g. There is also land north of Witney Road, Long Hanborough, which is on the opposite side of the road to the 169 dwellings granted approval on appeal, which could be allocated for residential development without a significant impact on its setting, as the issues are very similar to those relating to the land south of Witney Road. (Further consideration is given to this issue in the representations submitted in relation to Main Modifications 27; 160; 170; 171; 172, 173, 174 & 175 seeking the designation...
of this site.) It is therefore not considered to be true that Long Hanborough 'is only suitable for very modest levels of further development.'

With regard to the argument with regard to the proximity of the West Oxfordshire Garden Village, this argument is made in the officers' report to Council on the 26 October 2016 which stated in paragraph 5.9 that:

It is recommended that the proposed Garden Village should be identified as a future rural service centre. The Garden Village would then replace Long Hanborough which would no longer be a defined rural service centre. This reflects the significant scale of development proposed in the Garden Village, the key role it will play as a transport and business hub, and the relatively limited scope for further development in Long Hanborough. It also avoids an over concentration of rural service centres in this part of the District.

However, there are two reasons why it should not replace Long Hanborough as a Rural Service Centre. One is that the proposed Garden Village site currently consists of fields, with no services and facilities and is not therefore a Rural Service Centre. Indeed, given the significant planning issues; funding and infrastructure that is required for a new settlement, the West Oxfordshire Garden Village may never come to fruition or may develop much more slowly than currently envisaged and so not perform a Rural Service Centre function during the entire plan period. Even on the most optimistic trajectory it is clear that it will not perform the role of a Rural Service Centre for many years.

Secondly it will effectively form an extension to Eynsham. Indeed, paragraph 9.5.40r of Main Modification 153 states that:

'By ensuring good links across the A40 (e.g. an iconic feature bridge as suggested in the Council's Garden Village expression of interest) existing residents of Eynsham to the south will be able to access the Garden Village to enjoy the services, facilities and amenities it will offer. Conversely, residents of the Garden Village will be able to access Eynsham and its services and facilities, thereby playing a complementary rather than a competing role.'

It will therefore effectively form an extension to Eynsham, in the same way that other settlement extensions such as the Littlemore Science Park and Blackbird Leys or Barton form part of Oxford, notwithstanding their separation from other parts of the city by the A4142 and the A40 respectively.

Indeed, by designating it as a separate Service Centre means that there would be two contiguous Service Centres. It makes much more sense to have Eynsham and the proposed Garden Village as one Rural Service Centre and Long Hanborough as another, as Long Hanborough serves a different area of the District to Eynsham.

Conclusion

For the reasons set out above it is considered that Long Hanborough is a highly sustainable location for development and therefore the designation of Long Hanborough as a Rural Service Centre, as proposed by the Council in the original submission West Oxfordshire Local Plan 2031 'is the most appropriate strategy when considered against the reasonable alternatives', (NPPF, para 182) based on the Council's own evidence base and that it would be wrong for it to be downgraded to a village.
Whilst Sustainable Urban Extensions on a large scale are a useful tool in delivering significant and challenging housing numbers – which is the case in West Oxfordshire – in this District SUEs are untested in planning and market terms.

There is, therefore, significant risk in the delivery of the SUEs, both in terms of lead in times through planning and site starts, and delivery rates once construction has commenced.

In itself this may not be significant an issue in respect of soundness however in West Oxfordshire through a combination of delays to the preparation of the Plan due largely to the Council seeking to bring forward a Plan which did not meet its own or Oxford City’s housing needs; and in the context of the District being someway short of delivering a five year housing land supply and being acknowledged as persistently underperforming in housing delivery reliance upon two SUEs which are unlikely to deliver in the timescales or the quantities envisaged will lead to the Plan failing and perpetuating the deficiency in the five year housing land supply.

The alternative approach is to allocate a greater number of smaller sites, which provide for inherent flexibility in the Plan and allows for rapid change in the event that any given site is delayed or isn’t brought forward since other sites are available to immediately address the issue. The alternative strategy is to allocate a series of reserve sites to ensure that in circumstances where the SUEs do not deliver in the timescale and quantities envisaged there are alternative options available to ensure as a minimum that the five year housing land supply requirement is met and the Plan does not fail.

This is a preferred strategy compared to committing to an early review of the Plan in the event that the SUEs do not deliver, since evidence in West Oxfordshire alone indicates that Plan preparation is slow and cannot be relieved upon as a means of delivering housing land supply.

We submit representations in relation to the following five sites located within West Oxfordshire on behalf of the Commissioners to the West Oxfordshire Call for Sites in February 2016:

- Land North of Bampton
- Deanery Farm
- Church Close
All five sites are immediately available and are suitable for allocation. We understand these have not been included within the Submission Draft West Oxfordshire Local Plan Local Plan 2031 and instead there is a focus on larger allocations.

**Housing**

We understand that MAIN22 of the Submission Draft West Oxfordshire Local Plan Local Plan 2031 now includes a proportion of 2,750 Oxford’s unmet housing need as well as West Oxfordshire’s own housing need. MAIN 23 and MAIN24 then highlights how this and West Oxfordshire’s own housing need will be accommodated across the borough. Smaller sites can make a significant contribution through windfall development to meeting this housing target.

Main Modifications 23 and 24 refer to the amount and distribution of housing across the district. We agree with the inclusion of unmet need arising from Oxford City in the draft Local Plan. This has updated the total housing need for the district to 15,950 for the period up to 2031, including 13,200 homes from 2011-2031 to meet the district’s own need and 2,750 from the period 2021-2031 to meet Oxford City’s unmet need.

We would however point out that as South Oxfordshire have not agreed to the Oxfordshire Growth Board figures and that the unmet need to be apportioned to West Oxfordshire may be subject to change to resolve this situation. Flexibility should therefore be built into the plan to ensure that there is a sufficient supply of available and deliverable sites that can brought forward should the objectively assessed and unmet housing need change.

Moreover Hallam Land considers that it is not necessary to ring fence the requirement to meet unmet Oxford City needs and rather that this should be included within an overall combined requirement for the district. In addition, due to uncertainty regarding housing need in the area the objectively assessed need, as reflected in the housing requirement should not be considered a maximum but a minimum as it should in each of the sub-area policies. Not only will this allow for flexibility in the local plan, it will ensure that sufficient homes are being built in West Oxfordshire to support local growth, the local economy and sustaining local infrastructure and services – this is particularly the case in main and rural service centres across the district.

**Eynsham Garden Village**

We do not believe that the Garden Village proposal at Eynsham is an appropriate measure for delivering the unmet need for Oxford. It is based on an ambitious timescale for delivery and given that the Government’s announcement for the results of Garden Village proposals has not yet been announced (MAIN 17 references an application for funding), it is unclear how and whether the council will be able to deliver the scheme if the site is not selected of the Locally-led Garden Villages. The anticipated delivery numbers in the bid document are also unrealistic. It would be more appropriate to deal with the objectively assessed need and allocate development to settlements that can deliver homes across the plan period in a more effective manner. MAIN 3, 9, 15 16, 17, 23, 24 and 27 should be reconsidered and amended accordingly.
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<td>1853</td>
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<td>MAIN 4 Para 2.9 states: “Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of ‘unmet’ housing need that Oxford City are unable to provide for within their own administrative boundary.” We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification. We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1, 2, 13, 14, 15, 17, 23, 24, 27.</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>MAIN 23 notes that of the new homes proposed to the west of Eynsham 450 will accommodate West Oxford’s housing need and 550 will accommodate Oxford City’s housing need. For the reasons set out above we support this modification.</td>
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<td>MM754</td>
<td>Persimmon Homes Wessex</td>
<td>Claire Hambleton</td>
<td>Ms</td>
<td>Hambleton</td>
<td>1891</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>Main Modification 22/23/24 (Unsound) The consortium supports the housing requirement of 660 homes per year as identified in the Oxfordshire Strategic Housing Market Assessment (SHMA) which was published in April 2014. The Oxfordshire Growth Board, where all Oxfordshire Districts are represented has agreed to meet Oxford’s unmet housing need and the report published in September 2016 sets out the apportionment of need to each Council. The unmet housing need apportioned to West Oxfordshire is 2,750 homes. The consortium supports the Council’s agreement that it will deliver the agreed proportion of Oxford City’s unmet need of 2,750 homes. The delivery of the unmet need between 2011 and 2031 is not supported. On the basis that we are already five years into the SHMA period (2011-2016) 688 homes should have already been delivered as part of Oxford’s unmet need. It should also be noted that within the report published by the Oxfordshire Growth Board, ‘A Countywide Approach to Meeting the Unmet Housing need for Oxford states the following: One critical matter to recognise is that the assessment of the spatial options included recognition that deliverability of allocated sites was considered on a comparable basis between the different Districts, with an assumed start date of 2021 for the commencement of development after the adoption of the respective Local Plan review or Local Plan update/refresh. This assumption does not preclude earlier delivery, but does recognise the complexity of the issues being considered and has sought to factor in reasonable lead times to enable options to come forward and to be fully considered through the Local Plan process. It is recognised that Oxford City’s unmet need apportioned to West Oxfordshire of 2,750 homes will be delivered through a strategic urban extension to the west of Eynsham and a new Garden Village to the north of the A40 near Eynsham. The New Garden Village at Eynsham is proposed for at least 2,200 homes. The consortium believes that it is overly optimistic to assume commencement of development within 2021 given the complexity of the site in terms of land assembly and associated infrastructure requirements. It is also</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>recognised that an Area Action plan is to be drawn up for the site, which from our experience can take up to two years to produce. In paragraph 5.22, the Council states that the garden Village proposal (2,750 homes) will treat the provision for 2,750 homes separately from the West Oxfordshire's housing requirement. The Garden Village should not be treated as its own housing market area, there is no justification for treating the Garden Village as its own entity with its own five year housing land supply calculation. There is also no justification as to why the unmet needs of Oxford City are to be delivered post 2021, the housing need for West Oxfordshire is from 2011 and this should be dealt with imminently. Concern is raised that a five year housing land supply will not be met upon the Plan's adoption.</td>
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<td>Proposed modification- Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making. The proposed 'Garden Village' is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification. The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process. A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance. Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.</td>
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Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.

MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.

MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.

MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document.

The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.

The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.

The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.

While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.

MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those
We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.
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<p>| MM773 Sharba Homes | Sharba Homes | Sharba | Sharba Homes | 2088 | &gt; SECTION 5 - PROVIDING | We note that the objectively assessed need for West Oxfordshire is set at 660 dwellings per annum (13,200 homes in total) and we would agree that this will result in a significant increase in the rate of delivery within |</p>
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<td>The District compared to the previously historic lower rates. We acknowledge the amended wording in relation to the unmet need from Oxford City and the rationale behind the apportionment allocated to West Oxfordshire to deliver. We agree that to meet this requirement that the delivery rates will need to increase substantially to 935 dwellings per annum from 2021 to 2031 to meet this need and that this will be extremely challenging for the District to deliver. As such, we believe that as many sustainable and unconstrained sites as possible should come forward for development at the earliest possible opportunity. As set out previously within these representations, we believe the site at Hailey offers a logical and sustainable location for growth within the village within close proximity to the Main Service Centre of Witney.</td>
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<td>We strongly object to the proposal for a separate land supply calculation for the 2,750 dwellings at Eynsham – to be taken account of in the period 2021 -2031. There is nothing within the NPPF or the PPG to support this approach. The NPPF is clear that when dealing with need, it is the need of the Housing Market Area as whole which needs to be met. It is not appropriate to ‘ring-fence’ need in this manner.</td>
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<td>The plan is considered not to suitably address housing need despite the uplift in numbers. There has been insufficient development in the first five years (up to 2016) which is further increasing unmet need. The Council assert that the residual Liverpool method is most appropriate to address the 1,836-dwelling backlog (excluding Oxford City unmet need) from 2011-2016 rather than Sedgefield which is recognised in Planning Practice Guidance (PPG).</td>
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<td>However, in an appeal decision dated 26th July 2016 at Milton-under-Wychwood1, the Inspector concluded that “Housing land supply in the District is less than 2 years. Such a shortfall must be regarded to be severe.” This was based on the ‘Sedgefield’ method of calculation and was not contested by the Council. Nine other recent Appeals this year in the District have concluded similar shortfalls and all those decisions by the Inspectorate have used the Sedgefield approach. There is no justification supplied for using the Liverpool method.</td>
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<td>Main Modification 29 (paragraphs 5.34b) confirms that West Oxfordshire will apply the Liverpool method in calculating the 5-year housing land supply which seeks to address the under-supply over the plan period rather than the immediate 5-year period. IND16 (The Inspectors Preliminary Findings – Part 2 para 2.15) stated that WODC need to have regard for National Guidance as the Liverpool method is not mentioned. Furthermore, the Houses of Parliament Briefing Paper Number 03741 dated 25 May 2016 Planning for Housing states that Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period, thus the Sedgefield approach should be adopted. This is especially important given the severe shortfall of 1,836 homes, the serious affordability concerns in the local area (house prices 10 times lowest incomes).</td>
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<td>Alongside this context of a severe shortfall in housing delivery, the report of the Oxfordshire Growth Board Post SHMA Strategic Work Programme report2 states that:</td>
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<td>&quot;133) The Programme is not seeking to allocate or release sites, but has at a high level and using a common basis, through the work streams; identify the evidence of each district’s ability to absorb additional growth to meet a share of Oxford’s unmet need. It will be for each of the districts through their normal Local Plan processes to allocate sites sufficient to meet their proposed share of Oxford’s unmet need under the requirements of the Duty to Co-operate.&quot;</td>
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134) It is also important to note that the yield figures for each area of search represent estimated housing numbers to be delivered by 2031 – total capacities at a number of these sites may change through local assessment as part of the more detailed Local Plan process, taking a wider range of planning factors into account, including the potential to deliver further housing beyond 2031.”

MM22 Paragraph 5.17 asserts that the delivery of unmet Oxford City housing need at Eynsham will be delivered in the period 2021 to 2031 – which would require delivery of 220 dwellings per annum from a standing start in 2021: itself highly optimistic – rather than address unmet needs also within the first 5 years of the plan period. Whilst it is not disputed that Eynsham will not deliver prior to 2021, this underlines the need for the Council to augment its housing land supply to identify and allocate additional land for housing in the short term to meet housing needs in the first half of the plan period. This is especially important given the significant shortfall of 1,836 homes, the serious affordability concerns in the local area (house prices 10 times lowest incomes) and considering the Inspector’s preliminary findings that it was his initial view that unmet need would need to be considered in calculating the 5-year land supply (Paragraph 7.6 (IN015)).

Instead the Council’s Housing Land Supply Position Statement October 2016 simply indicates that Eynsham will ‘kick in’ from 2021 onwards as ‘agreed’ through the joint work at the Growth Board: such a view is not supported by the statement above from the September 2016 OGB report which emphasises the sovereign nature of Local Plans in identifying land to address unmet need. Rather than the response to delivery new homes to meet unmet needs ‘kicking in’ in 2021, this should be seen as ‘kicking the can down the road’. Unmet need, is, by definition, unmet.

It is counter intuitive for the Council to hold the view that the present day need for housing should be addressed in 5 years’ time or beyond. The Inspector’s Preliminary Findings (IN015) confirmed that if the Council failed to consider the implications of unmet housing needs the plan would be out of date before it can be adopted. The inescapable conclusion to this is that unmet housing needs should begin to be addressed at the time of adoption of this plan: arguably now. Were that not the case, logically an early review which gives time to consider and then respond to unmet needs would be appropriate, which it is evidently not.

The Vale of White Horse Local Plan, recently adopted, commits to allocating sites to contribute towards Oxford’s unmet housing need within the Local Plan 2031: Part 2, to be submitted to the Secretary of State, within two years of adoption of the Local Plan 2031: Part 1 – i.e. by December 2018: otherwise the unmet housing needs from Oxford City will become part of its housing land supply requirement. West Oxfordshire’s approach to this issue is therefore wholly contradictory: the timing of its plan enables the Council to seize the opportunity to deliver new homes to meet unmet housing needs from the City of Oxford, yet to put this off until after 2021 will simply fail those who are presently in need of a new home. One cannot meet today’s needs tomorrow.

Furthermore, it is considered a key concern that there is too high a reliance on development which will deliver after 2021 within the plan as a whole. The Council’s Housing Land Supply Position Statement October 2016 indicates only 1,035 homes out of 8,169 dwellings on proposed allocation sites in the draft Plan will occur prior to 2021; that is a paltry 12.6% or 207dpa. This will only address a little over half of the current backlog let alone what is needed going forward. This extreme low delivery for the first 10 years of the plan risks exacerbating affordability challenges district wide and places further stress on housing need.

When drilling down into the detail, it is proposed that the Witney sub-area (which incorporates Hailey) will provide 4,400 homes. This is made up from proposed allocations and additional sustainable sites which come
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Objections are lodged in respect of the proposed Strategic Urban Extension of around 1,000 homes to be delivered to the west of Eynsham together with the 2,200 new homes proposed in the new garden village near Eynsham to the north of the A40.

Whilst Sustainable Urban Extensions on a large scale are a useful tool in delivering significant and challenging housing numbers – which is the case in West Oxfordshire – in this District SUEs are untested in planning and market terms.

There is, therefore, significant risk in the delivery of the SUEs, both in terms of lead in times through planning and site starts, and delivery rates once construction has commenced.

In itself this may not be significant a issue in respect of soundness however in West Oxfordshire through a combination of delays to the preparation of the Plan due largely to the Council seeking to bring forward a Plan which did not meet its own or Oxford City’s housing needs; and in the context of the District being someway short of delivering a five year housing land supply and being acknowledged as persistently underperforming in housing delivery reliance upon two SUEs which are unlikely to deliver in the timescales or the quantities envisaged will lead to the Plan failing and perpetuating the deficiency in the five year housing
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<td>2124</td>
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<td>Modifications to Policy H1 set out that provision will be made for a total of 15,950 homes in the period 2011-2031. The Consortium agree with the principle of providing this level of new homes as a minimum threshold for housing delivery in the District over the plan period. The Consortium further agree to the principle of providing at least 2,750 new homes at Eynsham over the period 2021-2031 to meet Oxford City’s unmet housing needs, to be delivered in part through a new Garden Village to the north of the A40. The Consortium therefore agrees with the thrust of the proposed main modification set out at Paragraph 5.21 to provide at least 2,200 new homes at the proposed Eynsham Garden Village by 2031.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>541</td>
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<td>MAIN 23, Para 5.20</td>
<td>Not sound</td>
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<td>The ‘strategic urban extension’ to the west of Eynsham, including 550 homes for Oxford City, will lead to more commuting to Oxford and increased flood risk. Surely it is a mistake to build on either side of the Chil Brook (a ‘functional floodplain’, according to the 2016 SFRA Update Report). Presumably you will follow the advice of the Cherwell and West Oxfordshire Level 1 Strategic Flood Risk Assessment and carry out the ‘required’ Level 3 Flood Risk Assessment before you do anything else?</td>
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<td>MM324</td>
<td>R O Evans</td>
<td>Mr Evans</td>
<td>596</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
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<td>The Charlbury Neighbourhood Forum is a community group set up by the Charlbury Town Council. It is currently preparing both Community Led and Neighbourhood Development Plans on the Council’s behalf. While I am a member of the Forum, this representation is made in a personal capacity as an interested local resident who was a Planning Inspector from 1991-2015. This objection is made to the revised wording of paragraph 5.21(b). Consistent with my major objection on the setting of ‘indicative requirements’ within the AONB, this sentence should include additional wording as follows: “save that, in the case of land within the CAONB, this will only be to meet identified local needs.”</td>
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<td>MM357</td>
<td>Tony Bovey</td>
<td>Mr Bovey</td>
<td>668</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt;</td>
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<td>5.20, 5.21, 5.22, Eynsham: scale of proposed development is too great. The village could not cope with this quantum of development. The western SDA should be reduced in size, provided a western distributor road is built first. The Oxford overspill element should be part of the Garden Village, thereby accelerating implementation, facility and infrastructure provision (especially public transport and access to enlarged...</td>
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<td>MM363</td>
<td>Oxford City Council</td>
<td>Ms Dell</td>
<td>685</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>Land and New Allocations. It does appear that the new strategic site allocations (West of Eynsham &amp; the ‘Garden City’ Eynsham) together with increasing the capacity on the three existing strategic allocations provides sufficient land in principle to meet their SHMA targets and make a significant contribution to Oxford’s ‘unmet’ housing need. The two new strategic allocations in Eynsham (Garden Village and West of Eynsham) have emerged through the joint working arrangements and given their strategic spatial location appear to be best placed to help contribute to meeting Oxford’s ‘unmet’ housing need. Support: The City Council therefore support in principle: * Main Mod 16 Policy O2 ‘Locating development in the right places’, which identifies Eynsham and the Garden Village as the most appropriate allocations to help to meet Oxford’s unmet housing need * Main Mod 23, and in particular paragraphs 5.20 and 5.21 which also confirm the importance of these two principal sites. * Main Mod 27 which then goes on to identify these sites as ‘strategic development areas’ in para 5.29 and 5.34d and * Main Mod 30 Policy H2 'Delivery of new homes' which incorporates “further 2,750 homes in the period 2021 – 2031 to meet Oxford City's housing needs.” Objection: Given Oxford’s acute housing shortage the City Council would seek some assurance that the deliverability of the two new strategic allocations will be prioritised over and above increasing the capacity on the three existing strategic site allocations. Otherwise there could be further delay in meeting the city’s urgent housing requirements, particularly bearing in mind this Plan only goes to 2031 and development will not start until 2021. The delivery of this housing is urgently needed to meet Oxford’s unmet housing need and therefore the City Council would expect an Area Action Plan for Eynsham and the Garden Village to be commenced at the earliest opportunity to take forward the delivery of these ‘Strategic Development Areas’.</td>
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<td>MM33</td>
<td>Nicholas Goodwin</td>
<td>Mr Goodwin</td>
<td>71</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>The plan as currently envisaged is overly dependent on government approval for the “garden village”. Paragraphs 5.20 and 5.21 are presented as separate developments. They should be considered together, giving the Council greater control of where the houses and other facilities are located, taking account of flood risk, transport routes and opportunities for local employment.</td>
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<td>MM7</td>
<td>Leitch</td>
<td>Dr McDougall</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 23</td>
<td>Sustainability Appraisal addendum report; Comments 14-11-16 1 The report should summarise previous analysis of the sources which lead to the number of houses considered necessary in west Oxfordshire rising from 10500 to 15950 in the period reviewed. It seems that after the inspectors comments the houses needed have increased by ~50%. Such a major alteration of scale needs a clear, traceable line of argument. The planning exercise since 2007 does not clearly and strongly engaged the business community in Oxfordshire as to the nature and scale of economic growth that might be credibly forecast in order to assess housing numbers, the type of people to be housed and the location of employment sites. The whole exercise seems to be limited to “where houses can be built” and hope economic benefits might follow.</td>
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| MM388             | Ainscough Strategic Land  | Ainscough Strategic Land | - | Ainscough Strategic Land | BS2 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 23 | 2 The planning process is dominated by the location of houses but with inadequate consideration of costs that fall on local tax payers with respect to increasing the capacity of education, of health care, and of communications. Have the NHS and Oxfordshire county council education "signed off" that the increase in population can be accommodated without deterioration of service to the established population? The population of west Oxfordshire is given as 105,000 (2011) and the housing numbers proposed in the next 15 years will result in a further 50,000 people living in the area at the end of the period. I see no evidence that there is a plan to maintain quality of life for the total proposed population.  
3 The AONB should be protected at all costs. The environment and landscape of the Cotswolds provides for a valuable tourist industry and creates a sense of wellbeing in the many small communities distributed throughout the area. These features attract people to work in the area who thereby contribute to the economy, but they need to be integrated with established communities without destroying the very features which attracted them to the area in the first place. Each acre of green field land built on means one less person can be fed from UK resources. Only small (circa 10 houses) developments should be allowed in the AONB, located with well thought out and delivered design to mesh new settlements with the existing landscape and built environment.  
3. OVERALL STRATEGY AND PROVIDING NEW HOMES  
Policy OS2 – Locating Development in the Right Places (MM16)  
3.1 The Submission Draft Local Plan (May 2015) contains core objectives to help guide the development of the District. Core objectives C01, C02 and C04 place significant emphasis on locating development in appropriate locations where it can meet local needs and reduce the need to travel. These core objectives are taken forward into a defined settlement hierarchy and a development strategy set out by Policy OS2 – Locating Development in the Right Places, which is effectively the plans spatial distribution policy. Policy OS2 is therefore clearly a major policy which goes to the very heart of the Local Plan. Policy OS2 is subject to a major modification (Modification 16).  
3.2 Our principle issue with the revised policy is the extent to which it has been modified which results in a very different plan to what was submitted. We have raised a number of issues with regard to the manner in which this policy has been modified from a procedural perspective in Section 2.  
3.3 Regarding the revised Policy OS2 itself, we continue to support the identification of the three main service towns as the principle focus for development, including Chipping Norton. However, it is now clear that Eynsham will effectively become a settlement that will have a higher population than Chipping Norton and Carterton. In effect, it will become the second largest settlement in the District. We do not believe this is consistent with the long-established ‘three towns’ strategy and this therefore has implications for the Local Plan as a whole.  
3.4 Whilst we note that a wider dispersed option was tested through the SA, there does not appear to have been an option that looked specifically at dispersed growth option in the eastern part of the district, which could have considered For example, an alternative option to targeting growth towards the settlement of Eynsham could have been to consider additional growth spread across the villages to the Eynsham-Woodstock sub area of the District and perhaps areas to the east of Witney, Duckington, Hailey, Finstock, Stonfield and Charlbury. Dispersed growth across these settlements would appear to be a potential option to meet Oxford’s unmet needs.  
3.5 ASL support the recognition that further allocations may need to be made through Neighbourhood Plans |
in relation to villages but note that should it become evident that the Local Plan is not delivering, there will need to be sufficient policies and triggers within this Local Plan to require an early review, as the burden to meet needs cannot simply be left to local communities.

Policy H1 – Amount and Distribution of Housing (MM21 to MM24)

3.6 Regarding MM21, we do not dispute the position that the level of growth needs to considered against associated impacts, but we are not convinced that ‘growth needs to be managed in order to prevent significant change to the intrinsic character of the District’ is the correct term to use here as the barometer to which impact will be considered. Indeed, the modified Plan proposes significant change to the character of some areas (i.e. Eynsham). The test has to be if the meeting needs would significantly and demonstrably outweigh the benefits, as set out at paragraph 14 of the NPPF.

3.7 With regard to the overall quantum of housing now being proposed as part of MM22, we can confirm that we support the evidence base conclusions on housing requirements, which have been placed within the Modified Policy H1 (MM24). ASL support the 15,950 dwelling requirement overall, which comprises of 13,200 homes for West Oxfordshire and 2,750 homes for Oxford's unmet needs that are now enshrined in this policy.

3.8 ASL do not take specific issue with the proposed distribution of new homes. Indeed, we support the requirement for the Chipping Norton sub area at 2,400 new homes over the plan period and notwithstanding our points regarding statutory requirements in relation to the preparation of a Local Plan (as set out in Section 2), we do not take particular issue with the spatial distribution that is being proposed, we just do not feel such a major change can be enveloped into the current process without serious risk of by-passing key requirements of the law when preparing a Local Plan. Put simply, we thing the changes have gone a step to far to be incorporated in to this plan as modifications post submission of the plan.

3.9 The increased housing requirement within each of the districts sub-areas is set out in Table 1 (ATTACHED). The housing requirement for the District has gone up by 51%, which has then led to significant changes to the spatial distribution of development.

3.10 The Eynsham-Woodstock sub-area requires 243% more homes that originally envisaged within the Submission Draft Local Plan, which perfectly highlights the substantial change to the distribution of development that is now being promoted.

3.11 Chipping Norton's requirement has also increased by 50% and as noted above we support this as it brings it more in line with requirements for the other three main towns (whilst noting Chipping Norton is the smallest of the three towns). However, as noted in Section 2, in proposing this increase in housing numbers for the settlement, the Council have only considered one option for delivering this number of new homes through the SA by increasing the size of the Tank Farm Site (SDA).

3.12 We note the other areas have not increased as much and even in those instances, we note the SA has tested various site options for the increased growth.

3.13 In terms of other issues with the revised policy, we object to the notion that the Garden Village should be regarded as a free standing settlement. It isn't and is clearly related and connected to Eynsham, with the site and urban boundaries adjoining and the entirety of the site falling within Eynsham Parish.

3.14 We continue to support the final paragraph in Policy H1 which confirms the Council will monitor
WTC is concerned about the high housing target that is now being proposed. In the original draft Local Plan, development annually to ensure that the overall strategy is being delivered.

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| MM448         | Woodstock Town Council | Woodstock Town Council | Mrs Grant | 1038 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 24 | WTC is extremely concerned about the level of housing proposed in the Plan for Woodstock and the impacts it will have on local transport and the unique and historic character of the town. WTC notes that the Plan at paragraph 9.5.3 recognises that "Woodstock is a historic town of national, if not international renown". The Plan also recognises that tourism is particularly important to Woodstock’s livelihood. WTC is therefore confused and frustrated as to why WODC appears to be at odds with these acknowledgements by proposing excessive development which will only degrade the town. WODC first published a Draft Local Plan Part 1 in November 2012. The housing targets in that document were based primarily on South East Plan May 2009 figures extended on a pro-rata basis. The South East Plan was revoked in March 2013. Government guidance in paragraph 49 of the National Planning Policy Framework ("the Framework") states that local authorities should: "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" The guidance goes on to state at paragraph 159 that local authorities should: "prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period" This guidance led the Oxfordshire local authorities jointly to commission an Oxfordshire Strategic Housing Market Assessment (SHMA), which was published in April 2014. This countywide SHMA pointed to a requirement for more housing than has been anticipated previously, which in turn resulted in higher housing targets across the County.

The SHMA identified a requirement in West Oxfordshire for 660 dwellings per annum (dpa) or 13,200 over a 20-year plan period. In the initial submission version of the Plan, the WODC argued that the housing figures in the SHMA for West Oxfordshire were based on an abnormally high period of housing building and that consequently, the figures for the district were too high and should be adjusted downwards.

The Examination in Public (EiP) for the Plan was carried out in the autumn of 2015. Following the hearings, the Inspector in his preliminary findings stated that the level of housing identified in the Plan was not justified and consequently the examination was suspended in order for WODC to carry out further work on the level of housing identified in the Plan.

The Plan now provides for the full 13,200 dwellings as identified in the SHMA as well as 2,750 new dwellings to assist with the unmet housing needs of Oxford (a figure agreed through the Oxfordshire Growth Board; a joint committee of the six councils of Oxfordshire set up to facilitate and enable joint working on economic development, strategic planning and growth). WTC is concerned about the high housing target that is now being proposed. In the original draft Local Plan,
5,500 new households were planned over the period to 2029 (306 per annum over 18 years). A higher figure of 6,700, based on economic growth forecasts, was ruled out on the basis that it would put infrastructure under pressure, with potential negative sustainability impact. Now, just two years on, we are facing a proposed target of 15,950 houses by 2031 - an average of nearly 800 per annum.

This is completely beyond what has ever been achieved in the past and is not realistically achievable. If WODC were to fall behind on these targets, it would be vulnerable to much more of the speculative and inappropriate development which we have seen in the area over the last year or so. The system is being set up to fail.

The figures for Oxford’s unmet need are not based on existing need but on the need that would be generated by notional jobs that may or may not be created. Given its virtually full employment levels, there is of course no logical reason why Oxford City should be continuing to zone land for employment creation, whilst expecting the Districts to meet its housing need. These new jobs do not need to be created in Oxford, or even Oxfordshire, but could be directed to the County towns or supported in other parts of England where employment need is acute.

WTC would like to point out that there are a number of sites in Oxford which the city could release for housing to reduce the unmet housing need and the burden on neighbouring authorities. These are (but not limited to):

- Southfield Golf Course
- Oxford Stadium

There are a number of additional transport measures proposed to link in to the increased housing numbers. However, the A40 remains a major constraint. The modifications suggest a west bound bus lane between Oxford and Witney and duelling of the A40 between Witney and Eynsham. However ‘the anticipated cost of these improvements is £55m and there is no current funding available’. Moreover, an appeal has been allowed in Long Hanborough for 169 dwellings (14/1234/P/OP) and an additional appeal has been lodged for 120 dwellings (15/03797/0UT) in the same settlement. Houses are also being built in Bladon in the same area. Paragraph 27 of WODC’s Local Plan Monitoring Report states that the road section showing the greatest increase in vehicles between 2011 and 2015 was the A4095. This will only worsen with WODC’s proposals.

WTC is concerned that, despite the increase in housing numbers, there is no clear policy on housing density. To sustainably meet housing need, we need small, high density units. Any land allocations must deliver the maximum number of units and those units must be as affordable as possible. This can only be achieved via high density development. As it stands, the mix of housing proposed does not maximise the land available, nor deliver the lowest cost housing that is clearly needed. WTC therefore proposes an urgent review of allocations to ensure that maximum densities are achieved. Specifically, it should be investigated whether the same number of houses could be built on less land, leaving space for the next Plan Period instead of having to make additional allocations.

MM451 English Heritage Historic England Mr Small 1057 > SECTION 5 - PROVIDING NEW HOMES > MAIN 24

Historic England welcomes and supports Proposed Main Modification MAIN24 for the caveat of protecting the important historic character and the setting of Blenheim Palace in Woodstock as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.
I object to the local development plan for provision of housing in Chipping Norton for these reasons:

1. The town’s infrastructure will not cope - the hospital has recently been downgraded, the fire service and station have been downgraded to one engine, the sewers already struggle to cope.
2. The road system already struggles with current traffic levels at all times of day.
3. Air pollution is already above recommended levels and the town is an Air Quality Management Area (AQMA).
4. Local employment opportunities are limited. Newcomers will mostly commute, adding more pressure to the roads.
5. Even with the new primary school incorporated in the Tank Farm plans, both Primary and Secondary school capacity isn’t adequate for the numbers proposed.
test its deliverability and environmental impact. Nevertheless, it will be a figure of considerable significance and weight, since it will have emerged from an evidence-based process to inform spatial options for growth outside Oxford City. My initial view is that it would need to be taken into account in calculating the 5 year land supply’ (Paragraph 7.6). (Our emphasis).

The above provides that the EiP Inspector’s initial view was that OCC’s unmet need should be included in any 5 year housing land supply calculation today. It is highly relevant that OCC’s needs are back dated to 2011 and 5 years have already passed, in which no strategy as to accounting for unmet needs has been identified. It follows that there is a pressing need to identify ways of meeting this need now. WODC’s intention to delay the delivery of this need (that already stems from a base date of 2011) for another 5 years is therefore contrary to the EiP Inspector’s interim findings.

Second, and for the reasons set out above, the proposed phasing of the requirement is contrary to paragraph 47 of the NPPF that seeks to boost significantly the supply of housing.

Third, the Council’s justification for not meeting OCC’s need until 2021, relies upon a decision to allocate two strategic urban extensions at Eynsham and the associated lag times that will occur between the allocation of these strategic sized sites and first housing completions. WODC have therefore made a plan making decision not to identify a larger suite of smaller / medium sized sites to support these strategic allocations, contrary to the EiP Inspector’s comments. As set out in other representations, suitable, available and achievable sites exist to supplement the identified strategic and non-strategic sites that are not presently allocated in the plan and could assist in meeting OCC’s needs now.

For the above reasons, the plan is not justified when compared to the reasonable alternative of allocating additional small/medium sized that can deliver in the immediate 5 year period and contribute towards OCC’s unmet needs immediately. In addition, the proposed phased requirement is contrary to NPPF paragraph 47 and therefore inconsistent with national policy and is not effective when considered against the alternative of meeting a neighbouring Council’s needs earlier in the plan period.

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<tr>
<td>MM505</td>
<td>Verena Hunt</td>
<td>Miss Hunt</td>
<td>1245</td>
<td>I agree with the proposed changes to Policy H1 for the distribution of new housing.</td>
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<tr>
<td>MM491</td>
<td>Crest Strategic Projects</td>
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<td>Crestr Strategic Projects</td>
<td>1351</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Main 24: Policy H1 3.16 The proposed modifications to Policy H1 are addressed and considered in respect of the approach to distribution against the proposed settlement hierarchy under submission Main 15 and Main 16. The inconsistent approach to the distribution of growth having regard to the settlement hierarchy and the findings of the SA is not supported by the evidence base. 3.17 It is notable that the proposed distribution of housing is now incongruously skewed having regard to the proposed settlement hierarchy and the preferred spatial options for accommodating growth set out within the SA11. Comparison of the submission Local Plan’s approach and that now proposed via the modifications highlights the consequence of the changes:</td>
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3.18 What is immediately apparent from the table above (ATTACHED) is that the Three Towns focus, with limited dispersal to the rest of the District, identified by the SA to be the most appropriate and sustainable option for the distribution of development, is no longer being followed. The approach taken by the Local Plan now, setting aside the introduction of the proposed Garden Village to help address the unmet housing needs of Oxford City, is to apportion development to meet the District’s OAHN target to locations that do not accord fully with the spatial approach supported by the evidence base.

3.19 While the apportionment of growth to the upper and lower ends of the distribution is broadly consistent, there is a narrowing in the distinction between Carterton and Chipping Norton within the Main Service Centre sub group in terms of their roles relative to one another in the hierarchy. This suggests a blurring of distinction and a failure to apportion growth in accordance with the scale of the receptor. Within the submission version of the Local Plan there was a clear and logical apportionment between the three main towns according to their scale, and a cascade down through the tiers of the hierarchy. The proposed modifications abandon this logical and consistent approach (having regard to the evidence) assigning similar levels of growth to Carterton and Chipping Norton (2,600/2,400) over the plan period despite Carterton being almost 2.5 times the size of Chipping Norton and comparatively much less constrained.

3.20 What is also immediately apparent is that despite a 25% uplift in the housing target for the District no additional development is directed to the second largest and second most sustainable settlement. Instead 33% more growth is directed to Chipping Norton and 19% more to Witney. However, remarkably the amount of growth directed to the Eynsham-Woodstock sub-area (not forming part of the Option 2 Three Towns focus) increases by 75% compared to the submission version of the Local Plan, elevating it to the second most important growth location in the District, despite being classed as a Rural Service centre, the function of which is inconsistent with the status now afforded via the changes to Policy H1. This excludes the apportionment to help meet Oxford City’s unmet need for housing.

3.21 Put simply the Council’s approach to distributing growth is entirely inconsistent with its own strategy and the evidence base that purports to support that strategy. The settlement hierarchy and the work that underpinned its formulation appears to have been abandoned. The approach is unsound and is not supported by the evidence.

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<td>D. Bury</td>
<td>1367</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>3.0 THE LEVEL OF HOUSING PROPOSED IN THE PLAN</td>
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<td></td>
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<td>Mr Bury</td>
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<td>3.1 The SHMA identified a requirement in West Oxfordshire for 660 dwellings per annum (dpa) or 13,200 over a 20-year plan period. In the initial submission version of the draft Plan, the Council argued that the housing figures in the SHMA for West Oxfordshire were based on an abnormally high period of housing building and that consequently, the figures for the district were too high and should be adjusted downwards.</td>
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<td>3.2 The Examination in Public (“EiP”) into the Submission Draft Plan opened in the autumn of 2015. Following the initial hearing sessions, the Inspector in his preliminary findings stated that the level of housing identified in the Plan was not justified. This led to the Examination being suspended to allow the Council time to carry out further work on the level of housing that should be identified in the Plan.</td>
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<td>3.3 The Plan now provides for the full 13,200 dwellings as identified in the SHMA as well as 2,750 new dwellings to assist in meeting Oxford’s unmet housing need for housing (a figure agreed through the Oxfordshire Growth Board).</td>
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<td>3.4 Our client supports the position now being adopted by the Council. Anything less would have been</td>
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<td>MM613</td>
<td>eMPIRE hOMES ltd</td>
<td>Brendan</td>
<td>Mr</td>
<td>O'Brien</td>
<td>1393</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
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supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. The following representations provide further information on the land north of the A44 and south of the Banbury Road, Chipping Norton.

1.0 DELIVERY AT EAST CHIPPING NORTON SDA (Policy CN1, MM138-MM140)

1.1 The East Chipping Norton allocation has been increased from about 600 dwellings at Tank Farm south of the London Road to 1,400 dwellings including 1,200 dwellings south of London Road and 200 north of London Road. The SDA now includes the provision of an Eastern Link Road.

1.2 Limited evidence has been published to demonstrate and assess the impacts of the increased allocation. The previous assessment of Strategic Site Options (Examination Document Ref OTH1) has not been updated. This provides a comprehensive overview of the site and a summary of the site constraints and impacts.

1.3 There would appear to be no evidence document which provides a summary of the modified East Chipping Norton SDA and its constraints. The SHELAA assesses a number of component sites but there is no expression of the overall size of the site and its developable area to ascertain whether delivery is realistic.

1.4 Previous landscape evidence was prepared for the Council by Kirkham Landscape Planning, the Landscaper and Visual Review of Chipping Norton Strategic Site Option (May 2014, Examination Document Ref LAN2). This concludes an indicative housing capacity for the land south of London Road of 500 dwellings within a similar area as now proposed by the Council.

1.5 This is significantly lower than the 1,200 dwellings now assumed by the Council and draws into question the deliverability of this number of dwellings.

1.6 Furthermore, it is noted that the East Chipping Norton SDA now also includes the provision of a link road through the allotment garden land.

1.7 The updated Infrastructure Delivery Plan 2016 does not provide a cost estimate for the provision of the link road. It is unclear what has been assumed for viability purposes.

1.8 Edgars Limited understand that the allotment land is under the ownership of Chipping Norton Town Council who object to the provision of the link road. This draws into question the deliverability of the eastern link road which is now integral to the modified East Chipping Norton allocation.

1.9 In Edgars opinion, the increased allocation at East Chipping Norton is not justified by the published evidence and there is a significant risk that it will not be realised.

1.10 Empire Homes Limited object to Policies H1 (MM24), H2 (MM29 and MM30), CN1 (MM140) and CN2 (MM143) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and contend that Land north of the A44 and south of the Banbury Road, Chipping Norton should be allocated to assist with the delivery of the East Chipping Norton SDA.
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<td>MM724</td>
<td>Gallagher Estates Limited</td>
<td>Gallagher Estates Limited</td>
<td>1640</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>HOMES &gt; MAIN 24 responsibility to plan for housing need are to be welcomed. In general, the allocation of land to ensure that the District can provide for at least 15,950 homes during the plan period is supported. This takes into account relevant evidence and is more reflective of the District's housing needs than the previously unjustified figure of 10,500 homes. National planning policy is clear in providing for sustainable development to come forward without delay. In this regard, it is recommended that Policy H1 should reflect national policy and be changed to: &quot;...at least 15,950 homes during the period 2011-2031.&quot; As set out, the proposed revision to Policy H1 refers to “a total of” 15,950 homes. This effectively places a cap on development and could prevent sustainable development from coming forward. The imposition of a maximum number, or a cap, on the number of houses is not justified. It is not supported by any substantive evidence and it is in direct conflict with national planning policy.</td>
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2.9 In addition to the 13,200 homes planned to be provided in order to meet the needs of West Oxfordshire, a further 2,750 homes are planned to meet Oxford City’s identified needs. The proposed 2,750 homes figure represents the recently agreed apportionment by the members of the Oxfordshire Growth Board, with the exception of South Oxfordshire District Council, at its meeting on 26th September 2016. The proposed apportionment had been determined on the basis of a report from Land Use Consultants (LUC), which provided a spatial assessment of options for accommodating the unmet needs of the City, as well other evidence relating to economic, education and transport considerations.

2.10 It had been expected that the authorities would confirm a Memorandum of Cooperation at the meeting on the 26th September to the effect that the six authorities ‘agree’ that the apportionment figures “represent the agreed apportionment”. However SODC was unwilling to agree to the Memorandum on the basis that the areas of search within their administrative area included in the LUC report had not been put forward by the District Council.

2.11 Although the recognition by WODC of the need to make provision to assist in meeting Oxford City’s unmet needs is supported, there remains significant uncertainty as to whether the 2,750 dwellings proposed to be provided for is in fact the correct level of development to be planning for.

2.12 The 2,750 dwellings is based upon the apportionment proposed by the Oxfordshire Growth Board and agreed by the majority of the LPAs, which is itself based on an assumption that the unmet needs of Oxford City totals 15,000 dwellings. This 15,000 dwellings figure has yet to be publically tested, and we envisage that the West Oxon EIP will be the first time this occurs. Notably, the Oxford City First Steps consultation (August 2016) itself appears to identify a shortfall of 22,000 rather than the 15,000 which was planned for by the Growth Board. There therefore remains a question as to whether the high level apportionment figure is correct, and consequently what implications there may be for the West Oxon Local Plan.

2.13 In refusing to agree the apportionment proposed by the Growth Board, South Oxfordshire did raise that in their view Oxford City may be able to accommodate more of its own needs than is currently being allowed for. Whether this would equate to the additional 7,000 dwellings which appear to potentially be unaccounted for at this stage, and additionally reduce the currently proposed apportionment figures would appear to be unlikely. At this stage therefore as a minimum there are 4,950 dwellings (the proposed apportionment for South Oxfordshire) for which provision is not being currently being made for within Oxfordshire, and this could potentially increase to 11,950 dwellings, if the unmet need is ultimately determined to be 22,000 dwellings rather than 15,000.

2.14 Following the Growth Board meeting on 26th September there has been no published update as to how matters are to be progressed following the failure to agree the
apportionment figures with all authorities. As such it is unclear, leaving aside the question of the true scale of Oxford City's unmet needs, how the additional 4,950 (or at least a proportion of this assuming South Oxfordshire would be willing to accommodate some of this need) is to be provided for.

2.15 Notably the Growth Board papers for the 26th September meeting themselves highlighted that "it remains for individual authorities to test the SHMA results and its application in their respective local circumstances and to determine whether their Local Plans can sustainably accommodate development to meet the housing need identified.” The proposed apportionment has not been subject to Sustainability Appraisal and as such there remains uncertainty that having agreed to the apportionment figures whether these authorities will in fact be able to deliver these requirements.

2.16 As such, whilst we commend West Oxfordshire for agreeing to accommodate 2,750 dwellings of Oxford City's unmet needs and consider it to be a pro-active response which potentially complies with the Duty to Cooperate, due to the remaining uncertainties we consider a commitment should be made in the Plan to an early review of the Plan. This would provide a commitment for an early review should a need to provide for an increased number of dwellings to meet the needs of Oxford City be demonstrated. Such a commitment was included in the Proposed Submission Draft of the Local Plan, and it is considered that similar wording should be reinserted into the Plan to ensure it is justified and effective. We note that this approach was taken in the Vale of White Horse.

Other Matters

2.17 The Proposed Modifications to Policy H1 as currently drafted state that “provision will be made for a total of 15,950 homes in the period 2011 – 2031.” This contrasts with the wording of the Submission Version of the Plan which stated that "West Oxfordshire will provide at least 10,500 new homes between 1st April 2011 and 31st March 2031.”

2.18 Paragraph 14 of the NPPF makes clear that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” The Policy as currently drafted does acknowledge that:

"This is an indicative distribution and should not be taken as an absolute target for each sub-area or maximum ceiling to limit development.

Additional sites may for example be identified through Neighbourhood Plans increasing housing supply above that which has been identified and planned for in this Local Plan."

2.19 Furthermore it is noted that Policy H2, discussed in turn below, does state that the target is to deliver “at least 15,950 new homes.” As such, for consistency and to ensure the Plan is justified and effective, we would recommend that the proposed policy wording is amended to state that:

"Provision will be made for a minimum of 15,950 homes in the period 1st April 2011 to 31st March 2031."
The proposal to remove Long Hanborough from the Rural Service Centres and designate it as a village is unsound for the following reasons:

1. Its long history as a Service Centre

Long Hanborough has been designated as a Service Centre for a long time. It is designated as a Service Centre in the West Oxfordshire Local Plan 2001 - 2011 (Figure 5.2) and was proposed to be designated as a Rural Service Centre in the submission West Oxfordshire Local Plan 2031 (Table 4.1). The National Planning Policy Framework (NPPF) requires that ‘the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence,’ (para 182) and the Council has long accepted that there is sufficient evidence to justify the designation of Long Hanborough as a Rural Service Centre.

2. Wide range of services and facilities

There is ample evidence that Long Hanborough has a wide range of services and facilities and therefore merits its Rural Service Centre status. These include a new spacious doctors’ surgery for which planning permission was obtained in July 2016 and which will be provided as part of the residential development on the land south of Witney Road granted planning permission under appeal ref: APP/D3125/W/15/3129767. The new doctors’ surgery is required to be provided under conditions 15 & 16 of the permission within 2 years of commencement of the development and to remain in that specified use. This will replace the current cramped doctors’ surgery, which is well below NHS England standards of provision for the population it serves, and not only improve facilities for existing residents, but also provide the capacity for the provision of more homes in Long Hanborough. Other services and facilities include a primary school; petrol station; churches; post office; two Co-op food stores; dental practice; playing fields; spacious village hall; nursery; beauty salon; two public houses; fish and chip shop; substantial employment estate (circa 10.72 hectares) and a mainline train station (the Cotswold Line).

3. Close relationship to the Oxford and Oxfordshire City Deal and the ‘Knowledge Spine’

A key part of the case for Long Hanborough to remain as a Rural Service Centre is its close relationship to the City Deal. The Oxford and Oxfordshire City Deal is part of the Government’s initiative to devolve powers locally in exchange for local authorities taking on responsibility for creating economic growth in their areas. The Oxford and Oxfordshire City Deal aims to promote growth by maximising the existing educational, pharmaceutical and science assets in order to promote Oxford and Oxfordshire’s status as a prosperous economic area.

The City Deal, is a cooperative venture, which will be delivered through the Oxford Local Enterprise Partnership (LEP) bringing together other bodies and institutions, including Oxford City Council, Cherwell District Council, South Oxfordshire District Council, Vale of the White Horse District Council, West Oxfordshire District Council, Oxfordshire County Council, Oxford Brookes University and Oxford University. The area of the City Deal is County wide.

The proposed development at Long Hanborough is very close to the ‘Knowledge Spine’ identified in the City Deal, which stretches from Science Vale, near Didcot to Bicester, with Oxford at its heart. Paragraph 9.5.11 of the Local Plan acknowledges this, stating that the proximity of the Eynsham-Woodstock sub-area to major...
employment growth areas 'present a diverse range of opportunities within close distance including within the Oxfordshire knowledge spine suggesting the Eynsham Woodstock area has a positive role to play in terms of economic development.' Two key proposed employment sites that are close to Long Hanborough, and which housing there would help to serve, are the Science Park at Begbroke, which Cherwell District Council has identified in its Local Plan 2011 - 2031 (adopted July 2015) policy Kidlington 1 for Accommodating High Value Employment Needs and the Northern Gateway, which adjoins the A44 at the northern edge of Oxford, which Oxford City Council has allocated in its Northern Gateway Area Action Plan (adopted July 2015) policy NG2 for up to 90,000 m2 of employment uses that directly relate to the knowledge economy and include science and technology; research; bio-technology; and spin off companies from the universities and hospitals.

The City Deal commits the participating local authorities to accelerate the delivery of 7,500 homes across the county; and recognizes that the provision of quality housing close to the employment areas is fundamental to the delivery of innovation led growth.

The importance of housing provision to the achievement of the objectives of the City Deal is emphasized in the section on 'Planning for Development,' that states: 'The City Deal should enable further economic growth. However, this success has placed pressure on the local housing market. Oxford and Oxfordshire have overwhelming evidence that the lack of choice and availability of housing and affordable housing is a major barrier to growth. Oxford and other areas in the county are identified as among the least affordable locations in the country, and significantly ahead of London. The universities and businesses in the knowledge economy identify that housing is a significant barrier to the recruitment and retention of staff, including senior management and researchers. More housing is essential for the future of the knowledge economy in Oxford and Oxfordshire. City Deal partners recognise that a more strategic and ambitious approach towards housing growth is essential to the future of the knowledge economy in Oxford and Oxfordshire, and will ensure that the area continues to be a dynamic place to invest and work.

The proximity of Long Hanborough to the 'Growth Spine,' and its ability to contribute to the City Deal further emphasizes the importance of it continuing to be designated as a Rural Service Centre.

4. Recent Rail Improvements & Further Improvements Detailed in the Main Modifications will enhance Long Hanborough's role as a Rural Service Centre

There is therefore absolutely no evidence to demonstrate that it should be downgraded to village status. In fact, the service centre role performed by Long Hanborough has improved in recent years due to the improvements that have taken place in the rail service with further improvements proposed.

The presence of the train station at Long Hanborough is virtually unique in West Oxfordshire. None of the three main settlements of Witney, Carterton and Chipping Norton has a train station and the only other service centre which has one is Charlbury, which is located within the Cotswolds Area of Outstanding Natural Beauty (AONB) where development is therefore constrained in accordance with the advice in the National Planning Policy Framework (paragraphs 115 - 116). At Long Hanborough there is a regular direct train service to Oxford, Didcot, Reading, Slough, London and Worcester, with the journey to Oxford only taking ten minutes. This is of particular significance, as paragraph 9.5.34 of the Submission Local plan acknowledges that the Eynsham/Woodstock sub area, within which Long Hanborough is located, has 'very strong linkages with Oxford, with a high proportion of residents working in the city and much of the economic activity forming part of the wider Oxford city region economy.'

The proposed main modification 66 reinforces the importance of the Hanborough train station with
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<td>paragraph 7.57(a) stating that: ‘passenger growth on the Cotswold line has been significant with exceptional growth at Hanborough (up 239%).’ It states that ‘There is the potential for further growth with the introduction of an hourly service in December 2018. New trains will bring increased capacity with additional seating and will also achieve faster journey times, with some services from Hanborough reaching London Paddington in 63 minutes.’</td>
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There are also proposals for further improvements with paragraph 7.57 (b) stating that:

‘LTP4 identifies a strategic aspiration to develop Hanborough Station as a transport hub to help reduce congestion on the A40 as part of an overall package of public transport measures. To fulfil its potential, the station will require a larger car park, footbridge and new platform so any trains extended from Oxford can terminate and turnaround. To fully realise the potential of the railway, further redoubling will be required at the eastern and western ends of the line, between Wolvercote Junction and Hanborough, and from west of Evesham towards Pershore. This would allow up to three trains per hour to Hanborough and/or Charlbury and two trains per hour between London and Worcester, with a journey time under two hours.’

These points are also reiterated in paragraph 9.5.16 which refers to Hanborough station as being ‘one of the District’s largest and most well-used stations. Car parking facilities have recently been expanded at Hanborough to improve capacity and there are aspirations for further station improvements,’ and then goes on to repeat the improvements outlined in paragraph 7.57 above.

Paragraph 9.5.34 also states that: ‘there is potential to develop Hanborough Station as a stronger transport interchange, with additional parking, and improved access from the south.’

These improvements will further improve the sustainability of Long Hanborough and mean that it is far more accessible by public transport, particularly to Oxford, than any other service centre in West Oxfordshire, apart from Charlbury, which is in the AONB. This constant reiteration in the Main Modifications of the importance of Hanborough station and the further improvements planned for it, prove that Long Hanborough certainly merits its designation as a Rural Service Centre.

The proposed Main Modifications, however, go on to state in paragraph 7.57c that:

‘In light of the proposed improvements to Hanborough Station a key element of the proposed garden village to the north of Eynsham will be the provision of improved connectivity between the new settlement and the station particularly by bus and cycle.’

Given, that Long Hanborough is located adjoining the station there is already excellent connectivity with the train station, with a pedestrian and cycle path through the settlement providing access to it. It is also located closer to the station than the proposed garden village. With the recent and proposed improvements to the station it therefore clearly performs the role of an important transport hub and should retain its status as a Rural Service Centre.

5. Scoring in the West Oxfordshire Local Development Framework Settlement Sustainability Report (November 2016)

The Council has prepared a Settlement Sustainability Report (November 2016), which gives weighted and unweighted scores. In both Hanborough scores above all of the villages, scoring the same as the Rural Service Centre of Bampton and 2 points more than Bampton in the Weighted Score. However, Long Hanborough’s
position as a Rural Service Centre is even more significant than this indicates as there are three different positive indicators for a bus service which are:

- Daytime bus service;
- Evening bus service;
- Bus service every 30 minutes

However, for the train there is only one score for a railway station in the parish. At Hanborough Station there is an evening train service, with the last train arriving at 23.02. The train also only takes 10 minutes from Oxford station, giving Hanborough a high level of accessibility, so the rail service clearly merits a higher score than the unweighted score of 1 or the weighted score of 2.

With regard to the weighted score, there is a strong argument that having a railway station in the parish should result in a weighted score of 4 being given, as is the case where a Post Office; Shops; Primary School; Doctors' Surgery and Local Employment Opportunities are present.

6. The Planning Inspector Philip Asquith who considered the appeal into the proposed residential development and doctors' surgery on land south of Witney Road, Long Hanborough considered that Long Hanborough merited designation as a Rural Service Centre.

The Inspector who determined the planning appeal relating to land south of Witney Road, Long Hanborough, (APP/D3125/W/15/3129767 & 12/1234/P/OP) also considered Long Hanborough to merit the designation as a Rural Service Centre, stating that:

49. 'Long Hanborough is one of the nine larger settlements in the district classified in the WOLP as Service Centres. These, by definition, have a good range of facilities, services and transport accessibility to support their immediate communities as well as neighbouring hinterlands. This is confirmed by the Council’s Settlement Sustainability Report, revised in December 2013. The village is also defined as one of six Rural Service Centres within the emerging Local Plan 2031. The Statement of Common Ground between the appellant and the Council notes that Long Hanborough is a suitable location to accommodate significant residential growth. There is a range of local services, including a small business park adjacent to the station, which allows a proportion of travel demand (alternative to the car) to be met locally.’

50. The village is only one of two settlements within the category of Main Towns and Rural Service Centres in the district to have a mainline station. The rail line provides direct services to London, Oxford, and Worcester ......... It is apparent that there is a commitment to the introduction of new trains with greater capacity, with a longer-term commitment to increase the number of trains from Long Hanborough to Oxford, cut journey times to London and undertake enhancements to the station’s facilities.’

Counter Arguments

There is therefore abundant evidence that Long Hanborough merits its Rural Service Centre designation.

There are two arguments against its designation which are the Council’s statement in paragraph 9.5.3a that:

‘Given the residential schemes of 169 homes and 50 homes recently approved, the limited role of the
settlement and its landscape setting, it is only suitable for very modest levels of further development.’

The other being the argument made in the officers’ report to Council on the 26 October 2016, (paragraph 5.9), that the proposed designation of the West Oxfordshire Garden Village would mean that there would be too many Rural Service Centres in this part of Oxfordshire.

Neither of these arguments is considered to be a valid reason to remove Long Hanborough’s status as a Rural Service Centre. In the first place the Council is itself proposing in the main modifications to designate two additional sites at Long Hanborough for residential development, these being land at Myrtle Farm, Long Hanborough for 50 homes under policy EW1 f and the other being land at Oliver’s Garage, Long Hanborough for 25 dwellings under Policy EW1 g. There is also land north of Witney Road, Long Hanborough, which is on the opposite side of the road to the 169 dwellings granted approval on appeal, which could be allocated for residential development without a significant impact on its setting, as the issues are very similar to those relating to the land south of Witney Road. (Further consideration is given to this issue in the representations submitted in relation to Main Modifications 27; 160; 170; 171; 172, 173, 174 & 175 seeking the designation of this site.) It is therefore not considered to be true that Long Hanborough ‘is only suitable for very modest levels of further development.’

With regard to the argument with regard to the proximity of the West Oxfordshire Garden Village, this argument is made in the officers’ report to Council on the 26 October 2016 which stated in paragraph 5.9 that:

It is recommended that the proposed Garden Village should be identified as a future rural service centre. The Garden Village would then replace Long Hanborough which would no longer be a defined rural service centre. This reflects the significant scale of development proposed in the Garden Village, the key role it will play as a transport and business hub, and the relatively limited scope for further development in Long Hanborough. It also avoids an over concentration of rural service centres in this part of the District.

However, there are two reasons why it should not replace Long Hanborough as a Rural Service Centre. One is that the proposed Garden Village site currently consists of fields, with no services and facilities and is not therefore a Rural Service Centre. Indeed, given the significant planning issues; funding and infrastructure that is required for a new settlement, the West Oxfordshire Garden Village may never come to fruition or may develop much more slowly than currently envisaged and so not perform a Rural Service Centre function during the entire plan period. Even on the most optimistic trajectory it is clear that it will not perform the role of a Rural Service Centre for many years.

Secondly it will effectively form an extension to Eynsham. Indeed, paragraph 9.5.40r of Main Modification 153 states that:

‘By ensuring good links across the A40 (e.g. an iconic feature bridge as suggested in the Council’s Garden Village expression of interest) existing residents of Eynsham to the south will be able to access the Garden Village to enjoy the services, facilities and amenities it will offer. Conversely, residents of the Garden Village will be able to access Eynsham and its services and facilities, thereby playing a complementary rather than a competing role.’

It will therefore effectively form an extension to Eynsham, in the same way that other settlement extensions such as the Littlemore Science Park and Blackbird Leys or Barton form part of Oxford, notwithstanding their separation from other parts of the city by the A4142 and the A40 respectively.
Indeed, by designating it as a separate Service Centre means that there would be two contiguous Service Centres. It makes much more sense to have Eynsham and the proposed Garden Village as one Rural Service Centre and Long Hanborough as another, as Long Hanborough serves a different area of the District to Eynsham.

**Conclusion**

For the reasons set out above it is considered that Long Hanborough is a highly sustainable location for development and therefore the designation of Long Hanborough as a Rural Service Centre, as proposed by the Council in the original submission West Oxfordshire Local Plan 2031 'is the most appropriate strategy when considered against the reasonable alternatives', (NPPF, para 182) based on the Council's own evidence base and that it would be wrong for it to be downgraded to a village.

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<td>MM727</td>
<td>Archstone Land</td>
<td>Jonathan Porter</td>
<td>Mr</td>
<td>Porter</td>
<td>1650</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>We support the use of the Oxfordshire SHMA as the basis for the new housing requirement figure. The SHMA has been successfully tested at recent Local Plan examinations for the other Oxfordshire authorities of Cherwell District and the Vale of White Horse.</td>
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<td>MAIN24 proposes an increase in the amount of housing to be distributed to Witney, from 3,700 homes to 4,400 homes (+700 homes). MAIN27 identifies that the majority of this is to be delivered through increases in the capacity of the two previously identified SDAs- North Witney and East Witney.</td>
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<td>Whilst we broadly support the increase in housing provision proposed at Witney, as we set out below, we object to the strategy for delivering the increased housing requirement, principally through unsustainable and undeliverable increases in the capacity of the proposed SDAs. Furthermore, we consider that the allocations proposed elsewhere within the District, within the Chipping Norton and the Eynsham-Woodstock sub-areas, are not achievable within the plan period and therefore increases the pressure for additional housing provision being allocated to Witney.</td>
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<td>We therefore conclude that additional land should be allocated to ensure that the strategy for Witney is &quot;justified&quot; and &quot;effective&quot; and consider that South Witney should be identified to help meet the Witney sub-area requirement.</td>
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<td>Burford - Charlbury Sub-Area</td>
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<td>Policy H1 should be amended to omit reference to new housing at the rural service centres of Burford and Charlbury. The Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 20% to 1,000 homes.</td>
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<td>Paragraph 116 of the NPPF clearly states that exceptional circumstances must be demonstrated to justify allowing major development in the AONB. This paragraph states that consideration of such applications should include an assessment of the need for the development and its impact on 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 and the landscape.</td>
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The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area; however, that is not a reason to increase housing within the sub area.

Given the opportunities to address housing need outside of the AONB, recognising that there will still be 800 homes in the sub area, there have been no exceptional circumstances given for the inclusion of additional land within the AONB for development in the draft Local Plan. As a consequence, MM184 should be deleted as it refers to allocations at Burford, Charlbury, Shipton-under-Wychwood and Stonesfield, all within the AONB. The plan is not justified when considered against the reasonable alternative to development in the AONB and inconsistent with national policy.

Support MAIN 24 – amended Policy H1 amount and distribution of housing Council's Housing Land Supply Position Statement October 2016 The NPPF’s Core Planning Principles (Para 17) state that decision making should proactively drive and support sustainable development to deliver the homes, businesses, infrastructure and thriving places that the country needs.

One of the key objectives of the NPPF is to boost the supply of housing required to meet the needs of present and future generations, whilst delivering a wide choice of high quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities

New para 5.13 sets out that “in addition to meeting West Oxfordshire's identified housing needs we are committed to assisting our neighbours Oxford City” and establishes a working assumption of 15,000 homes over the Plan Period.

The pressing need for new housing has been translated into policy targets for the delivery of new homes across West Oxfordshire, and across the County.

New paragraph 5.14 continues, stating "it has been agreed that West Oxfordshire will accommodate 2,750 homes in the period between 2021 and 2031 to assist Oxford City with its unmet housing need". The District Council acknowledges that "this rate of delivery is nearly double the historic long term housing delivery rate in the District and will be extremely challenging for the house building industry to deliver."

Paragraph 181 of the NPPF states that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.

In this regard we would support the increased housing allocation for the District, both in terms of providing for its own housing needs and those of Oxford City.

The Plan demonstrates cross-boundary cooperation across Oxfordshire in seeking to deliver the homes the county needs, in accordance with the provisions of the NPPF.
2.8 As part of the process to address the Inspector’s concerns and to ensure the Plan is sound, the Council held a consultation on a SHMA Partial Update in July 2016, which our clients responded to. The SHMA Partial Update concluded that the objectively assessed need for the District was 568dpa over the period 2011-2031. Although an increase above the 525dpa which had been proposed in the submission version of the Local Plan, this continued to fall significantly short of the 661 dpa advocated in the Oxfordshire SHMA (2014).

2.9 The Council’s proposed modifications now seek to meet the OAN advocated in the Oxfordshire SHMA, with a total of 13,200 new dwellings to be delivered over the Plan period 2011-2031 to meet the needs of West Oxfordshire. The preparation of a joint SHMA for the whole of the Oxfordshire HMA is considered to have been a significant positive step which recognises the interrelated nature of the individual local authority areas and meets the requirements of the Duty to Cooperate. The soundness of the OANs advocated in the Oxfordshire SHMA have already been the subject of rigorous testing through both the Cherwell and Vale of White Horse Local Plan Examinations and have been confirmed to be a robust and sound basis on which to base those respective Local Plan’s, as shown in the latest Vale of White Horse inspector’s report (albeit with a 2 year ‘review clause’).

2.10 We support the proposed modification to make provision for the full OAN of the District, which ensures a consistent and robust baseline is being used in order to plan for the needs of the County and is considered to be a sound basis for the preparation of the Plan. Oxford City Unmet Needs

2.11 In addition to the 13,200 homes planned to be provided in order to meet the needs of West Oxfordshire, a further 2,750 homes are planned to meet Oxford City’s identified needs. The 2,750 homes represents the recently agreed apportionment by the members of the Oxfordshire Growth Board, with the exception of South Oxfordshire District Council, at its meeting on 26th September 2016. The proposed apportionment had been determined on the basis of a report from Land Use Consultants (LUC), which provided a spatial assessment of options for accommodating the unmet needs of the City, as well other evidence relating to economic, education and transport considerations.

2.12 It had been expected that the authorities would confirm a Memorandum of Cooperation at the meeting on the 26th September to the effect that the six authorities ‘agree’ that the apportionment figures “represent the agreed apportionment”. However SODC was unwilling to agree to the Memorandum on the basis that the areas of search within their administrative area included in the LUC report had not been put forward by the District Council.

2.13 Although the recognition by WODC of the need to make provision to assist in meeting Oxford City’s unmet needs is supported, there remains significant uncertainty as to whether the 2,750 dwellings proposed to be provided for is in fact the correct level of development to be planning for.

2.14 The 2,750 dwellings is based upon the apportionment proposed by the Oxfordshire
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<td>Growth Board and agreed by the majority of the LPAs, which is itself based on an assumption that the unmet needs of Oxford City totals 15,000 dwellings. This 15,000 dwellings figure has yet to be publically tested, and we envisage that the West Oxon EiP will be the first time this occurs. Notably, the Oxford City First Steps consultation (August 2016) itself appears to identify a shortfall of 22,000 rather than the 15,000 which was planned for by the Growth Board. There therefore remains a question as to whether the high level apportionment figure is correct, and consequently what implications there may be for the West Oxon Local Plan.</td>
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<td>2.15</td>
<td>In refusing to agree the apportionment proposed by the Growth Board, South Oxfordshire did raise that in their view Oxford City may be able to accommodate more of its own needs than is currently being allowed for. Whether this would equate to the additional 7,000 dwellings which appear to potentially be unaccounted for at this stage, and additionally reduce the currently proposed apportionment figures would appear to be unlikely. At this stage therefore as a minimum there are 4,950 dwellings (the proposed apportionment for South Oxfordshire) for which provision is not being currently being made for within Oxfordshire, and this could potentially increase to 11,950 dwellings, if the unmet need is ultimately determined to be 22,000 dwellings rather than 15,000.</td>
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<td>2.16</td>
<td>Following the Growth Board meeting on 26th September there has been no published update as to how matters are to be progressed following the failure to agree the apportionment figures with all authorities. As such it is unclear, leaving aside the question of the true scale of Oxford City's unmet needs, how the additional 4,950 (or at least a proportion of this assuming South Oxfordshire would be willing to accommodate some of this need) is to be provided for.</td>
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<td>Notably the Growth Board papers for the 26th September meeting themselves highlighted that &quot;it remains for individual authorities to test the SHMA results and its application in their respective local circumstances and to determine whether their Local Plans can sustainably accommodate development to meet the housing need identified.&quot; The proposed apportionment has not been subject to Sustainability Appraisal and as such there remains uncertainty that having agreed to the apportionment figures whether these authorities will in fact be able to deliver these requirements.</td>
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<td>2.18</td>
<td>As such, whilst we commend West Oxfordshire for agreeing to accommodate 2,750 dwellings of Oxford City's unmet needs and consider it to be a pro-active response which potentially complies with the Duty to Cooperate, due to the remaining uncertainties we consider a commitment should be made in the Plan to an early review of the Plan. This would provide a commitment for an early review should a need to provide for an increased number of dwellings to meet the needs of Oxford City be demonstrated. Such a commitment was included in the Proposed Submission Draft of the Local Plan, and it is considered that similar wording should be reinserted into the Plan to ensure it is justified and effective. We note that this approach was taken in the Vale of White Horse.</td>
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2.19 The Proposed Modifications to Policy H1 as currently drafted state that “provision will be made for a total of 15,950 homes in the period 2011-2031.” This contrasts with the wording of the Submission Version of the Plan which stated that “West Oxfordshire will provide at least 10,500 new homes between 1st April 2011 and 31st March 2031.”

2.20 Paragraph 14 of the NPPF makes clear that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” The Policy as currently drafted does acknowledge that: “This is an indicative distribution and should not be taken as an absolute target for each sub-area or maximum ceiling to limit development. Additional sites may for example be identified through Neighbourhood Plans increasing housing supply above that which has been identified and planned for in this Local Plan.”

2.21 Furthermore it is noted that Policy H2, discussed in turn below, does state that the target is to deliver “at least 15,950 new homes.” As such, for consistency and to ensure the Plan is justified and effective, we would recommend that the proposed policy wording is amended to state that: “Provision will be made for a minimum of 15,950 homes in the period 1st April 2011 to 31st March 2031.”

2.22 We comment elsewhere in this Statement on the Council’s proposed allocations proposed to meet the housing requirement and how the requirement is to be distributed over the Plan period and as such we do not repeat these comments here.
for additional flexibility should also be considered. Concern is therefore raised that the plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

2.28 The revised Policy as currently drafted states:

"With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

2.29 The NPPG is clear in its guidance to LPAs (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.30 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5 years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

2.31 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.32 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.33 Given our comments above it is clear that the Council will need to propose additional
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| MM736         | South Oxfordshire District Council | South Oxfordshire District Council | Planning | Policy Team | 1713 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 24 | I note that your overall housing target is 15,950 for the period 2011-2031. This comprises of 660 dpa x 20 years (13,200), plus the 2750 dwellings as the agreed apportionment of Oxford City's unmet housing need. You advise in paragraph 5.14 (Mods consult; page 32) that you agreed the Growth Board's recommendation for the apportionment, which will be delivered over the last ten years of the plan period as recognised by the Growth Board work. Consequently, the dpa will rise to 935 over the last ten years, 660+275 (2750/10), however it doesn't appear that this scenario has been tested. We believe that testing the 800 dpa scenario appears to be insufficient, if as stated, Oxford's unmet housing need would only be delivered over the last ten years.

I recognise that the approach you have chosen to meet Oxford City's unmet housing need is for you to determine, but believe more clarity should be provided particularly on how you will treat this unmet housing need separately. Will a 'ring-fence' apply to this unmet need or will it be treated in a different way? |
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<td>Braemar Property Developments</td>
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It is not considered that the Main Modifications appropriately seek to meet the identified housing need of West Oxfordshire District as well as making additional provision to accommodate an appropriate proportion of unmet housing need that Oxford City are now unable to provide for within their own administrative boundary.

Strong objections are raised in respect of this Main Modification.

Particular objections are raised in respect of the level of unmet need from Oxford City being accommodated within the District. Paragraph 5.13 of the Plan sets out that a working assumption of 15,000 homes has been agreed by the Oxfordshire Authority's as representing the quantum of Oxford's unmet housing need which must be accommodated elsewhere within the Oxfordshire Housing Market Area. However, the actual unmet need as set out within the SHMA is a range of between 15,000 – 18,000 homes. The District have applied a midpoint in applying the SHMA to the Districts own housing need and in the interest of consistency the same approach should be taken in respect of Oxford City's housing needs.

Furthermore, Paragraph 5.14 states that it has been agreed that West Oxfordshire will accommodate 2,750 homes in the period 2021 – 2031. This equates to 935 dwellings per annum when added to the Districts own housing requirements however this excludes past backlogs.

It is not considered that the 2,750 homes is an agreed, reasonable and proportionate division of Oxford City needs given that between 15,000 and 18,000 homes are to be distributed across the four Oxfordshire Districts.

In addition, if the annual housing requirement (the Districts own housing needs together with Oxford City needs) do not include for past backlog, any calculation of housing land supply will need to factor in the backlog and due consideration will need to be given as to whether a 5% or 20% buffer should be applied on the basis of persistent underperformance.

Furthermore, as drafted the Plan does not reflect the latest position within the wider Strategic Housing Market Area in the context of the Duty to Cooperate. A Memorandum of Cooperation exists between all of the Oxfordshire Authorities in the context of having to meet the needs of Oxford City which cannot be accommodated within the city boundary. The Oxfordshire Growth Board have been tasked with identifying housing needs in Oxfordshire and then agreeing distribution across the authorities. The Plan for West Oxfordshire has been drafted on the basis of taking 2,750 houses in accordance with the Memorandum of Cooperation however South Oxfordshire have not agreed to their proportion of housing as confirmed at the Oxfordshire Growth Board meeting on 27th September 2016.

This is significant and goes to the heart of soundness for two key reasons:

Firstly, the Duty to Cooperate cannot be said to be met when one of the parties with whom West Oxfordshire are seeking to cooperate with are not in agreement on the strategy for distributing unmet housing need from Oxford City. This in itself indicates that the Plan for West Oxfordshire cannot be sound; and

In terms of housing numbers, South Oxfordshire were recommended as part of the Duty to Cooperate to accommodate 4,950 houses from Oxford City. This compares with 4,400 houses for Cherwell District, 2,200 for the Vale of White Horse and 2,750 houses in respect of West Oxfordshire. Thus, it can be seen that South Oxfordshire were proposed to accommodate the greatest proportion of Oxford City's unmet 15.065/Rep's housing need and therefore the scale of the issue that has now arisen given that South Oxfordshire have not
agreed to take these housing numbers is far greater than had the situation arisen in Cherwell District, Vale of White Horse District or West Oxfordshire District.

The consequence is that objectively assessed housing need are not being met in the housing market area until such time as either South Oxfordshire reverse their position and accept 4,950 houses arising from Oxford City; or the remaining authorities agree to take additional housing to reduce the amount that South Oxfordshire have to accommodate, to such a level that South Oxfordshire are prepared to agree to the housing numbers to be delivered in their administrative boundary.

There is no resolution to this matter and no indication from the Oxfordshire Growth Board Meeting of 27th September 2016 as to the extent of housing from Oxford City that South Oxfordshire District are prepared to accommodate. There is no alternative strategy available to the local authorities in Oxfordshire and no easy solution.

Such are the implications arising from the wider Housing Market Area it is recommended that further work on the West Oxfordshire Plan, including progressing further with the Examination be put on hold pending resolution of these key issues at the heart of Oxfordshire and the West Oxfordshire Plan.

Policy H1 – Amount and Distribution of Housing

Modifications to Policy H1 set out that provision will be made for a total of 15,950 homes in the period 2011-2031. CALA supports the principle of providing this level of new homes as a minimum threshold for housing delivery in the District over the plan period.

It is pointed out that the 2,750 homes is to assist in meeting part of Oxford City's un met need and that this figure may increase or decrease following the ongoing review of the Oxford City Local Plan that is currently due to be adopted in 2019. The West Oxfordshire Local Plan needs to remain flexible to address this issue. An early review is seen as the most appropriate mechanism to take account of this matter.

Main Modification 24 introduces an amendment to the emerging Local Plan 2031 to reflect that the Chipping Norton Sub-area is now proposed to accommodate more growth than originally envisaged in the submission draft Local Plan. This increase is fully supported by CALA. Chipping Norton is a sustainable location for development and is relatively un-constrained in terms of infrastructure.

Introduction

We write on behalf of our client the Church Commissioners for England (the Commissioners) which manages a well-diversified investment portfolio to support the Church’s work across the country and is a long-term landowner in the West Oxfordshire area. We understand that the Council are currently consulting on the proposed modification to the Submission Draft West Oxfordshire Local Plan Local Plan 2031 Consultation.

The Submission Draft West Oxfordshire Local Plan Local Plan 2031 seeks to address the initial concerns raised by the inspector in December 2015 following the first Local Plan hearing which dealt with strategic matters. These concerns generally related to the overall housing requirement and deliverability of these sites. We recognise that in response West Oxfordshire has increased the total housing requirement to 15,950 homes, allocated new sites and increased the size of strategic sites.

We submitted representations in relation to the following five sites located within West Oxfordshire on behalf of the Commissioners to the West Oxfordshire Call for Sites in February 2016:
The following representations provide further information on the site at Churchill Road and should be read in conjunction with Edgars’ general representations regarding housing supply which are not repeated here.
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<tr>
<td>1.0 LAND NORTH WEST OF 34 CHURCHILL ROAD, CHIPPING NORTON</td>
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<td>1.1 Our clients object to Policies H1 (Main Modification (MM) 24), H2 (MM29 and MM30) and CN2 (MM143) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that land at 34 Churchill Road and adjoining land to the north west should be allocated for around 75 homes to help address this deficiency.</td>
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Site and Surrounding Area

1.2 The site is situated in the south western part of Chipping Norton, which is the third largest town in the district offering both residents and visitors a good range of services and facilities. The site lies approximately 700m from the town centre and is a similar distance from Chipping Norton Leisure Centre and Chipping Norton School (secondary). It is less than 400m from St Mary’s School (primary). There are bus stops located on Churchill Road (within 150m of No. 34 Churchill Road), which provide access to a high frequency service to Oxford (S3) and a slightly less frequent service to Banbury (488). There is also a service (X8) that links Chipping Norton with Kingham Railway Station. The site is therefore in a highly sustainable location.

1.3 The site comprises approximately 4.5 hectares of land, identified on the plan attached at Appendix 1. The land forms part of the side of a valley and slopes downwards from the south east to the north west of the site. There is a two story dwellinghouse at 34 Churchill Road with vehicular access and egress to the front of the property via dropped kerbs in two locations. Access to the land at the rear (north west) of 34 Churchill Road is via an agricultural gate and grassed track situated between numbers 34 and 32 Churchill Road. The land north west of 34 Churchill Road is not currently actively used for agriculture, except for occasional grazing. Consequently, it could be described as unmanaged grassland, declining in quality. This land is divided into two parts, almost equal in area, by a tree-lined stream which runs from the site’s southernmost corner to its northernmost corner. The trees along this line are substantial and mature and are effective as a visual barrier.

1.4 The principal north-eastern and south-eastern site boundaries are shared with residential properties at The Leys and Lords Piece Road respectively. The rear gardens which back onto the site include considerable tree cover in the more Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation. December 2016 historic environment of The Leys. There is less tree cover in the 20th century residential development at Lords Piece Road which forms the more elevated backdrop to the site. There is a small group of industrial buildings, with a high number of trees in the curtilages, immediately adjacent to the site's northwestern boundary along the route of a former railway line in the floor of the valley. The group contains some relatively modern structures, which are unremarkable, but among them sits Bliss Mill. This is an imposing 19th century building (now converted to apartments), Grade II* listed and a notable local landmark. Beyond the industrial buildings lies the Chipping Norton Regulated Pastures, which is common land with open public access for recreation. Open countryside lies to the south west of the site.

1.5 The site falls within the Cotswolds Area of Outstanding Natural Beauty, the Chipping Norton Conservation Area and the setting of the listed building (Bliss Mill).

1.6 The 'Cotswolds AONB Landscape Strategy and Guidelines' (adopted in June 2016) states in relation to 'Vale of Moreton Farmed Slopes' Character Area (in which the site is situated) that the expansion of existing settlements onto the Farmed Slopes is regarded as a local force for change, with a range of potential landscape implications including the 'encroachment of built development onto the Farmed slopes intruding
1.7 It is to be noted in this instance that the site does not occupy the uppermost slopes. The existing substantial tree cover, both on the perimeter and a belt running through the site, makes the land less visually prominent than the common land to the north west and the open countryside to the south west.

1.8 The Chipping Norton Conservation Area Character Appraisal identifies the bowl-shaped valley landscape setting of Bliss Mill as the most significant area of open space in the Conservation Area. While it is envisaged that within the Conservation Area the existing buildings, land uses, historic settlement patterns and open spaces should remain largely undisturbed, the guidance does enable development where views into and out of Chipping Norton, as well as views within Chipping Norton, are not harmed and where existing features of historic, visual or natural importance, such as trees, hedgerows, ponds, stone walls, paths and tracks are incorporated.

1.9 The site is not within an area that is at risk from flooding.

1.10 The site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELAA).

Key Planning Site Considerations

1.11 Additional technical work, including a Landscape and Visual Impact Assessment is currently being undertaken and likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as relevant to the potential allocation of the site.

The principle of housing development at Chipping Norton

1.12 Chipping Norton is identified as a Main Service Centre in the Local Plan 2031. Draft WOLP Policy H2 permits new housing on undeveloped land adjoining the built-up area to meet identified housing needs. As such housing development on the site would be acceptable in principle.

1.13 Draft Policies H2 and CN2 seek to secure the delivery of 2,400 new homes focused on Chipping Norton. Delivery is proposed partly through a strategic mixed used development area of around 1,400 dwellings on the eastern side of Chipping Norton. The provision of an eastern link road is an integral part of the proposed Strategic Development Area (SDA).

1.14 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which is likely to result in continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead in times of SDAs, addressing the current supply deficiencies is best achieved through allocating additional non-strategic developments such as Land at 34 Churchill Road and adjoining land to the north west.

1.15 In Edgars opinion, the development of Land at 34 Churchill Road and adjoining land to the north west can comply with Policy H2 in being adjacent to the built up area of a Main Service Centre in the settlement.
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1.16 Draft Policy OS2Locating Development in the Right Places states that a significant proportion of new homes, jobs and supporting services will be

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation, December 2016 focused within and on the edge of the main service centres of Witney, Carterton and Chipping Norton. Development is required to:

- form a logical complement to the existing scale and pattern of development and/or the character of the area;
- Be compatible with adjoining uses and not have a harmful impact on the amenity of existing occupants;
- as far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s;
- be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities; and
- Conserve and enhance the natural, historic and built environment.

1.17 The site is surrounded on three sides by existing residential and industrial development. It is considered that allocating the site for housing would form a logical extension of the existing built-up area, without encroaching on the more visually prominent parts of the valley that would otherwise cause harm to the setting of Bliss Mill.

1.18 Use of the land for housing is entirely compatible with the adjoining residential development at The Leys and Lords Piece Road. The retention of existing trees and hedgerows, especially on the perimeter of the site, will help to ensure that there is no harmful impact on the amenity of the existing occupiers of properties in these two roads. It will also help to preserve and enhance the character and appearance of the conservation area.

1.19 A new all-purpose access road is capable of being provided off Churchill Road following demolition of the existing dwelling at No. 34. A 6.0m wide access road with 9.0m radii (like the Lords Piece Road/Churchill Road junction) with 2.0m wide footways each side would be constructed. Junction visibility splays of 2.4m x 43m are readily available in accordance with the 30mph speed limit on Churchill Road. An offset distance of 20m (centreline to centreline) would be provided between the new access and the cul-de-sac on the opposite side of Churchill Road, named Edward Stone Rise. This specification would facilitate a development of up to 150 dwellings. However, having regard to the importance and sensitivity of the landscape, the character and appearance of the Conservation Area and the setting of the listed building, it is considered that around 75 dwellings would represent a more appropriate scale of development for this site.

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton

1.20 If the total number of dwellings on the site generated a need for a separate emergency access, this could be achieved by utilising existing rights of access to the gate in the northern corner of the site, from The Leys/Station Road. It would also provide an additional means of access for pedestrians and cyclists. In this manner, the development would be provided with safe vehicular access and safe and convenient pedestrian
1.21 The character and appearance of the AONB and the Conservation Area can be preserved and enhanced through a high quality evidence based development within a strong and extensive landscape framework. While the extent of the land is 4.5ha, around 75 dwellings are proposed leaving significant scope for open space and landscaping.

1.22 In Edgars opinion, a development of this scale does not comprise 'major' development for the purposes of NPPF paragraph 116 and that a development within a strong landscape framework will not have a significant adverse impact on the landscape and scenic beauty of the wider AONB. The public benefits of the scheme would outweigh any harm to the Conservation Area and the setting of Bliss Mill.

1.23 Although further work is being undertaken, Edgars consider that development can be achieved on the site which makes an important contribution to meeting housing land supply in a sustainable location, without significant impact on the settlement character, AONB or the Conservation Area.

1.24 Further detailed technical information is likely to be available during the next stages of the WOLP 2031 Examination.

We are concerned that the Council’s modified strategy for meeting future development needs is not the most sustainable, given the reasonable available alternatives. Our concerns relate both to the deliverability of the strategy overall, and whether the strategy is the most sustainable approach.

The Council’s housing requirement is for the delivery of at least 15,950 new homes in the period 2011-31. This is confirmed in draft Policy H2, and the wording of the first paragraph of draft Policy H1 needs amending for consistency.

It is recognised that this scale of development will require a significant increase in annual build rates, and we believe the District Council must respond by taking a positive and proactive approach to housing delivery. There needs to be a flexible supply of deliverable housing sites, which will allow the Council to deliver a minimum of 15,950 dwellings in the period 2011-31, even if some sites fail to come forward, or take longer to deliver than anticipated.

Unfortunately, draft Policy H1 (and relating supporting evidence, including the housing trajectory) provide no such flexibility. The draft Local Plan (incorporating proposed Main Modifications) only provides for 15,764 units, a theoretical shortfall of 186 units, with no plan-led flexibility to address unforeseen circumstances, including inevitable delays in the planning process.

A significant change between the publication version of the Local Plan and the Proposed Modifications version is that significant new development is proposed at Eynsham, in the form of a Garden village, and separately identified Strategic Development Area (SDA). The Council are expecting some 3,200 new dwellings to be delivered at Eynsham by 2031 – with maximum annual delivery rates (325 dwellings per annum) being achieved by 2021-22. This timeframe allows just over four years for the Local Plan to be adopted; an Area
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<td>MM743</td>
<td>East Witney Land Consortium</td>
<td>c/o Carter Jonas</td>
<td>c/o Carter Jonas</td>
<td>1771</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>The EWLC supports the continued allocation of Land to the East of Witney, as set out in paragraph 5.29 of the Local Plan. However, as set out elsewhere in these representations, we believe that the future development capacity at East Witney is higher than the indicated 450 homes.</td>
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Action Plan to be prepared, examined and adopted; outline and detailed planning to be achieved (including completion of S.106 agreements); and early phase infrastructure to be delivered. We consider the timetable for delivery at Eynsham to be at best optimistic – with a number of significant risks to the delivery of this scale of development within the Local Plan timeframe.

The time it has taken to negotiate the S.106 for development at North Curbridge (West Witney) demonstrates the risks involved in delivery and implementation. In October 2012 WODC published a Position Statement on Housing Land Supply. This stated at paragraph 1.23 – “In addition to the allocated sites, noted above, the West Oxfordshire Local Plan 2011 also included a proposal (Proposal 8) for a mixed-use development site at North Curbridge (to the west of Witney). A planning application has been submitted, showing a development including 1,000 new dwellings. It is estimated that delivery of these homes will commence in 2013/14, with around 600 being built during the 5 year period covered by this paper.”

The five year period referred to above is to 31st March 2018.

The Housing Trajectory included in Main Modifications version of the Local Plan assumes no completions at North Curbridge before 1st April 2018. This assists in demonstrating the vulnerability of the proposed Local Plan housing strategy.

In summary, we are concerned specifically about the assumed housing delivery rates at Eynsham and generally about the lack of flexibility in the proposed Local Plan strategy and housing allocations to deal with the inevitable delays in the planning and delivery process. Accordingly, we have concerns about the deliverability of the housing numbers as set out in the Proposed Modifications version of the Local Plan.

We are similarly concerned about the proposed intention to significantly increase the scale of development at some of the smaller settlements within West Oxfordshire District. The Sustainability Settlement Report clearly identifies Witney as the largest and most sustainable settlement in West Oxfordshire District. The Proposed Modifications result in a significant change in the distribution of development in the District, which in our view represents an inappropriate shift in the spatial strategy. Of the additional housing to be accommodated through the Main Modifications, only 28% is proposed to be accommodated at Witney, with 72% (the vast majority) to be accommodated at settlements further down the settlement hierarchy.

Chipping Norton, which abuts the Cotswolds AONB on three sides, has seen a very significant increase in the allocated scale of development allocated here, despite the facilities, services and employment opportunities being much less than afforded at Witney.

We believe that there is scope to deliver more development at East Witney and on Land off Jubilee Way, which is sustainability located, deliverable, and would assist in supporting the Local Plan strategy (as set out in the Local Plan, prior to the proposed Main Modifications). The merits of Land at East Witney and Land off Jubilee Way are considered further below, and have been set out in previous representations, including those made in response to the submission draft Local Plan (refer letter dated 8th May 2015).
5.1 Gladman generally supports the increase in the total housing provision in the Plan to 15,950 homes up to 2031, comprising 13,200 homes to meet West Oxfordshire’s own needs and 2,750 homes to assist with meeting the unmet needs of Oxford City. This increase is in line with the 2014 Oxfordshire SHMA and with the Memorandum of Cooperation in respect of Oxford’s unmet housing needs issued by the Oxfordshire Growth Board (OGB). It should, however, be expressed as a minimum requirement.

5.2 That being said, with regard to the provision towards Oxford’s unmet housing need, Gladman has a number of specific concerns. Firstly, the modification refers to the 2,750 homes being provided in the period 2021 to 2031. Whilst the Oxfordshire Growth Board Memorandum of Cooperation assumes the start date for the provision of the homes will be after 2021, it does not preclude delivery before 2021 or granting planning permissions for sites towards this need before 2021. It is clearly the case that planning applications need to be submitted ASAP and planning permissions made from now onwards in order that sites can be ready to deliver 2,750 by 2031. Indeed, the need to address the substantial unmet housing need in Oxford is urgent bearing in mind the SHMA period began in 2011 and some six years of that need being unmet has already elapsed (825 dwellings (2,750/20*6)) should have been provided within Oxford City. The Local Plan period means that Oxford’s unmet needs are only to be addressed in a 10-year period from 2021-2031, and wholly in one location (Eynsham). Bearing in mind the historic delivery rates in West Oxfordshire, and the obvious land ownership issues currently experienced on the large sites at Eynsham, the risk that the need will simply go unaddressed by the end of the plan period is very apparent; what if the two large Eynsham sites do not deliver? Gladman considers that the issue of unmet need should be dealt with in the short term with greater urgency (given the housing needs originate from 2011 and exorbitant affordability ratios across Oxfordshire), as would appear to have been the view of the Inspector as set out in his Preliminary Findings Part 1 (IN15 dated 15 December 2015) which stated that the unmet need would need to be taken into account in calculating the 5-year land supply. The Local Plan is therefore not effective, is inconsistent with NPPF, is not positively prepared and cannot therefore be considered to be sound.

5.3 Gladman’s second concern relates to South Oxfordshire District Council’s failure to sign the Growth Board Memorandum of Cooperation in relation to its apportionment of 4,950 homes of Oxford’s unmet need. If, as it appears likely, South Oxfordshire is unable or unwilling to accommodate its full share of Oxford’s unmet need, it will be necessary for the balance to be redistributed between the other Oxfordshire Districts including West Oxfordshire. However elsewhere in the Oxfordshire Strategic Housing Market Area, the Cherwell Local Plan was adopted in 2015 and a Partial Review to consider meeting its share of Oxford’s unmet need is at a very early stage. The Vale of White Horse Part 1 Local Plan has recently been found sound following examination and will be adopted early in 2017. A Part 2 Plan to deal with Oxford’s unmet need has not yet commenced and is not expected to be adopted until 2019. Unlike the other authorities in the Oxfordshire Strategic Housing Market Area, West Oxfordshire is therefore well placed to address this situation now and the Local Plan should build in flexibility to address any subsequent increase in its apportionment of Oxford’s unmet need.

5.4 The Council proposes to modify Policy H1 to significantly increase the amount of new housing at Eynsham to address the increased housing need and to contribute towards Oxford City’s identified housing need. The Plan proposes a new strategic extension located to the west of Eynsham and a new Garden Village to the north of Eynsham on the northern side of the A40.

5.5 Whilst Gladman supports the increase in the housing requirement in the Plan and considers that the Witney/Eynsham area is a sustainable location with the scope to support and benefit from additional new housing development, it has concerns regarding the robustness and soundness of the process of site selection that the Council has undertaken. These concerns are elaborated upon in our submissions in respect
5.6 The proposed modifications to Policy H1 make alterations to the indicative distribution of housing between the 5 Sub Areas of the District. Similar changes are proposed by the Council to the Tables showing anticipated housing delivery in the Sub Areas (Tables 9.1; 9.2; 9.3; 9.4 and 9.5) (Main Modifications 90, 119, 135, 150 and 185 refer).

5.7 The aggregated anticipated housing delivery from the Sub Areas meets the District’s housing requirement of 15,900 dwellings, however Gladman has analysed the actual delivery of housing from each Sub Area (as set out in Tables 9.1 - 9.5). This analysis is set out below (Table provided in original representations) and demonstrates that, as proposed to be modified, the Local Plan will not deliver the housing requirement.

5.8 The above table (Table provided in original representations) indicates that the Local Plan will deliver 15,764 dwellings compared to the housing requirement of at least 15,900 dwellings, a shortfall of 136 dwellings. In order to be found sound the Plan should be positively prepared and should at least be able to demonstrate that it will deliver the housing requirement. It should also be flexible and have the capacity to respond to changing circumstances; in order to do this some headroom in terms of housing provision should be built into the Plan. This is particularly important because the Council is already aware of a number of issues associated with permitted sites and those identified as emerging allocations.

5.9 The recent Local Plan Experts Group (LPEG) Report also recommends that “the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF” (para 11.4 of the LPEG Report). Gladman would suggest that a 20% contingency in housing supply should be built in to the Plan; this would require a housing supply of 19,080 to be identified.

5.10 In order to provide the appropriate degree of flexibility and contingency, Gladman submits that the Council need to allocate additional sites for housing development in the towns and sustainable rural settlements. Gladman generally supports an approach to the distribution of housing which reflects the needs and characteristics of individual settlements. However, in considering the distribution of housing growth, it is important to note that a fundamental objective of NPPF is to secure a thriving rural economy “by taking a positive approach to sustainable new development”2 The NPPF seeks to significantly boost the supply of new housing in rural areas; “housing should be located where it will enhance or maintain the vitality of rural communities” and market housing may be allowed where it “would facilitate the provision of significant affordable housing to meet local needs”.

Main Modifications 23 and 24 refer to the amount and distribution of housing across the district. We agree with the inclusion of unmet need arising from Oxford City in the draft Local Plan. This has updated the total housing need for the district to 15,950 for the period up to 2031, including 13,200 homes from 2011-2031 to meet the district’s own need and 2,750 from the period 2021-2031 to meet Oxford City’s unmet need.

We would however point out that as South Oxfordshire have not agreed to the Oxfordshire Growth Board figures and that the unmet need to be apportioned to West Oxfordshire may be subject to change to resolve this situation. Flexibility should therefore be built into the plan to ensure that there is a sufficient supply of available and deliverable sites that can brought forward should the objectively assessed and unmet housing need change.
Moreover Hallam Land considers that it is not necessary to ring fence the requirement to meet unmet Oxford City needs and rather that this should be included within an overall combined requirement for the district.

In addition, due to uncertainty regarding housing need in the area the objectively assessed need, as reflected in the housing requirement should not be considered a maximum but a minimum as it should in each of the sub-area policies. Not only will this allow for flexibility in the local plan, it will ensure that sufficient homes are being built in West Oxfordshire to support local growth, the local economy and sustaining local infrastructure and services – this is particularly the case in main and rural service centres across the district.

Eynsham Garden Village

We do not believe that the Garden Village proposal at Eynsham is an appropriate measure for delivering the unmet need for Oxford. It is based on an ambitious timescale for delivery and given that the Government’s announcement for the results of Garden Village proposals has not yet been announced (MAIN 17 references an application for funding), it is unclear how and whether the council will be able to deliver the scheme if it is not selected of the Locally-led Garden Villages. The anticipated delivery numbers in the bid document are also unrealistic. It would be more appropriate to deal with the objectively assessed need and allocate development to settlements that can deliver homes across the plan period in a more effective manner. MAIN 3, 9, 15 16, 17, 23, 24 and 27 should be reconsidered and amended accordingly.

Notwithstanding our support for the overall housing requirement and the positive measures taken to accommodate an element of Oxford City’s unmet need, for the reasons we have outlined above, we consider that elements of the policy are unsound because they are: a) inconsistent with national policy; and b) potentially ineffective.

As we have argued above, we have some reservations about the planned supply in the West Oxfordshire Garden Village being ring-fenced and excluded from the overall land supply calculation.

The figures for the sub-areas including the West Oxfordshire Garden Village total up to 15,950. It would have been helpful if the Council also provided a description of the numbers of homes left to be provided in each sub-area after deducting completions. It would also be useful to see what the contribution will be in each sub-area from strategic and non-strategic sites.

The inclusion of an additional quantum of housing to meet Oxford’s unmet needs is supported, and responds to one of the concerns of the Inspector when suspending the Examination. However, this must now be treated as part of the district’s OAN, and included in the five year supply, rather than ring-fenced as a separate quantum to be accommodated in a different way. Given that the strategy response for accommodating this additional need is a new Garden Village, which is to be brought forward through an Area Action Plan, has significant infrastructure requirements, and will therefore take many years to procure, the requirement must be factored into the supply side now. This is particularly so given the somewhat unrealistic Housing Trajectory set out in the Plan at Appendix 2, which indicates not only the first contribution to housing delivery from the proposed Garden Village in 2021-22, but both an initial and sustained contribution of 220 dwellings per annum over the ensuing 10 year period This would appear to be extremely optimistic, and indeed unrealistic, in terms of both the initial delivery trajectory and that it can be sustained at the same level for the remainder of the Plan period.

The distribution of the revised quantum is too focused on the existing main settlements, or otherwise on the proposed, and to date unfunded, new Garden Village. The consequence is reliance on delivery of a substantial quantum of the overall housing requirement from a relatively few large strategic sites /
development locations. This in turn gives rise to significant risks of delivery failure arising from slippage in the delivery trajectories from those sites owing to infrastructure and other constraints, including market saturation causing developers to moderate the rate of release of plots to the market.

There is evidence of little progress having been made on some large sites that have been identified for a considerable period of time. Not least amongst these is the strategic development area at West Witney. Application for outline planning permission (Ref: 12/0084/P/OP) for 1,000 dwellings was made in January 2012, and yet according to the Council’s web site remains undetermined. Even if planning permission is granted in early 2017, the delivery trajectory set out in Appendix 2 to the Plan looks optimistic given the number of land interests involved, requirements for reserved matters applications, and the substantial infrastructure that will need to be put in place before the first houses can be available for occupation.

In addition to the above, there are difficulties with the proposed strategic development area at East Witney, and from which the Council is relying on increased delivery (450 dwellings in total) through the Proposed Modifications. As was acknowledged by the Inspector in Part 2 of his Preliminary Findings (IN 016), there are considerable delivery risks associated with the development of this allocation owing to conflicting aims between the main parties, and the landowner not owning all the land required to deliver the requisite highway infrastructure (IN 016, paras. 2.3-2.6). Although the Council has responded by amending the delivery trajectory to postpone first completions until 2021-22, there is no certainty that the difficulties can be resolved.

With regard to Witney, given the delays in bringing forward the strategic development area to the west of the town, together with the substantial strategic development areas identified in the current Plan, the uplift in housing delivery required to yield its capacity in the period to 2031 is substantial for a town of its size. It is questionable whether the local market can sustain substantial sales volumes from three strategic development areas simultaneously, as well as a number of smaller sites, to deliver its required contribution during the plan period.

Through the proposed modifications the overall requirement for the Chipping Norton Sub-Area is increased by approximately 33%. This compares with a proportionate increase of approximately double that for the other sub-areas combined comprising the south of the plan area. That is a disproportionate increase that reflects the strategy to focus on a small number of large strategic sites in each of the sub areas.

The strategy for the Chipping Norton Sub-Area seems to be driven by the environmental sensitives affecting the principal settlement itself, and in particular its “… prominent hill-top position on the eastern edge of the Cotswolds Area of Outstanding Natural Beauty (AONB) within which most of the town is situated” (para. 9.4.1). However, those constraints do not affect the other principal settlements in the sub-area of Enstone and Middle Barton, which are outside the AONB and, particularly in the case of Middle Barton, a considerable distance away from it. In setting a capacity for the sub-area as a whole, insufficient regard appears to have been had to the potential of smaller settlements to accommodate growth.

To reduce the risks of delivery failure a more balanced distribution is required that increases the requirement for the Chipping Norton Sub-Area and provides a wider development focus, including smaller development opportunities at the rural settlements that can make an early contribution to improving the five year housing land supply. To achieve this more balanced strategy, a Rural Service Centre should be designated in the northern part of the Plan area, in which respect Middle Barton is the most appropriate settlement.
"Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of 'unmet' housing need that Oxford City are unable to provide for within their own administrative boundary."

"We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification."

We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1, 2, 13, 14, 15, 17, 23, 24, 27.

The consortium supports the housing requirement of 660 homes per year as identified in the Oxfordshire Strategic Housing Market Assessment (SHMA) which was published in April 2014. The Oxfordshire Growth Board, where all Oxfordshire Districts are represented has agreed to meet Oxford’s unmet housing need and the report published in September 2016 sets out the apportionment of need to each Council. The unmet housing need apportioned to West Oxfordshire is 2,750 homes. The consortium supports the Council’s agreement that it will deliver the agreed proportion of Oxford City’s unmet need of 2,750 homes. The delivery of the unmet need between 2011 and 2031 is not supported. On the basis that we are already five years into the SHMA period (2011-2016) 688 homes should have already been delivered as part of Oxford’s unmet need.

It should also be noted that within the report published by the Oxfordshire Growth Board, ‘A Countywide Approach to Meeting the Unmet Housing need for Oxford states the following:

One critical matter to recognise is that the assessment of the spatial options included recognition that deliverability of allocated sites was considered on a comparable basis between the different Districts, with an assumed start date of 2021 for the commencement of development after the adoption of the respective Local Plan review or Local Plan update/refresh. This assumption does not preclude earlier delivery, but does recognise the complexity of the issues being considered and has sought to factor in reasonable lead times to enable options to come forward and to be fully considered through the Local Plan process.

It is recognised that Oxford City’s unmet need apportioned to West Oxfordshire of 2,750 homes will be delivered through a strategic urban extension to the west of Eynsham and a new Garden Village to the north of the A40 near Eynsham. The New Garden Village at Eynsham is proposed for at least 2,200 homes. The consortium believes that it is overly optimistic to assume commencement of development within 2021 given the complexity of the site in terms of land assembly and associated infrastructure requirements. It is also recognised that an Area Action plan is to be drawn up for the site, which from our experience can take up to two years to produce.

In paragraph 5.22, the Council states that the garden Village proposal (2,750 homes) will treat the provision for 2,750 homes separately from the West Oxfordshire’s housing requirement. The Garden Village should not be treated as its own housing market area, there is no justification for treating the Garden Village as its own entity with its own five year housing land supply calculation. There is also no justification as to why the unmet needs of Oxford City are to be delivered post 2021, the housing need for West Oxfordshire is from 2011 and this should be dealt with imminently. Concern is raised that a five year housing land supply will not
Policy H1 - Amount and Distribution of New Housing

Main Modification 24, Policy H1, relates to the distribution of housing which is supported by a revised Sustainability Appraisal (SA). Policy H1 concluded that Carterton housing requirement would not be required to be adjusted from the original 2,600 allocation despite further provision being made in arguably significantly more constrained locations, including at Burford, Charlbury, Shipton-under-Wychwood and Stonesfield within the Area of Outstanding Natural Beauty (AONB), at Woodstock, despite impact on the setting of the World Heritage Site at Blenheim Palace, and at Chipping Norton, despite concerns regarding deliverability of a relief road and impact on ecology. Objection is raised to the increase in the scale of the Tank Farm proposal. The Sustainability Appraisal Proposed Modifications Addendum Report confirms that:

"Some uncertainty remains as details for mitigation/enhancement for landscape, biodiversity and green infrastructure effects, including longer-term cumulative effects, are dependent upon detailed masterplanning."

Policy H1 should be amended to omit reference to new housing at the rural service centres of Burford and Charlbury. As stated above, the Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 25% from 800 to 1,000 homes. Paragraphs 115 and 116 of the NPPF clearly state that great weight should be given to conserving landscape and scenic beauty in AONBs and exceptional circumstances must be demonstrated to justify allowing major development in the AONB. Paragraph 116 states that consideration of such applications should include an assessment of the need for the development and its impact on 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 and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area; however, that is not a reason to increase housing within the sub area. The draft plan is not consistent with national policy and has not been justified with regard to reasonable alternatives which exist to deliver development outwith the AONB, nor is it deliverable and effective in terms of proposed sites. The 2,500 jobs in Carterton 'missing' from WODC's analysis is a further factor that tips the balance firmly away from the AONBconstrained settlements.

The proposed distribution within each sub area should be modified to reflect the omission of the following sites:

1. Omit Proposed Modification increase in quantum of development of Tank Farm, Chipping Norton - which should remain at 600 homes;

2. Delete proposed allocations at:
   a. Milestone Road, Carterton (200 homes): not deliverable;
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   c. Land North of Jefferson's Place, Charlbury (40 homes): within AONB - exceptional circumstances not demonstrated;
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The Chipping Norton sub area anticipated delivery in Table 9.3 only amounted to 2,326 and could not deliver 2,400 as suggested by Policy H1 (74 less). Notwithstanding this, with the reduction in Tank Farm to 600 homes, the Chipping Norton sub area should plan for 1,530 homes (a reduction of 870 homes).

The Burford - Charlbury sub area should remain at 800 homes (a reduction of 200 homes).

The Eynsham - Woodstock sub area anticipated delivery in Table 9.4 only amounted to 5,474 (or 2,724 excluding Oxford City unmet need), and not 2,800 as suggested by Policy H1 (76 less). Notwithstanding this, with the omission of 250 homes at Woodstock the sub area should be reduced to 1,720 homes with the remainder required to address unmet need from Oxford City.

The Carterton sub area anticipated delivery in Table 9.2 only amounted to 2,552 homes rather than 2,600 as suggested by Policy H1 (48 less). With the omission of the Milestone Road and Swinbrook Road sites (270 homes) the total would be 2,282 homes. The Draft Plan should then include the alternative sites at Land North of Swinbrook Park (115 homes), and Land at North Carterton, Kilkenny Farm for 750 homes. These replace the Proposed Modifications allocations at Swinbrook Road and Milestone Road due to concerns regarding their deliverability. This would adjust the Carterton sub area number of homes to 3,147, rounded to 3,150 homes. This is not out of proportion to the additional jobs and economic growth SQW consider is likely in the Carterton sub area; and this economic justification is far more convincing than the unproven great weight and exceptional circumstances case for the AONB settlements.

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Witney sub-area 4,400 homes;
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The full OAN is considered to be 688dpa (see enclosed Barton Willmore response to The Oxfordshire Strategic Housing Market Assessment Partial Update (SHMA update) published in July 2016 by Peter Brett Associates (PBA)) to take account of the full affordable housing need. This would require the plan to provide 13,760 homes rather than 13,200 homes. Accordingly, sites for a further 1,400 homes will need to be identified, plus 760 within the plan period to account for that part of North Eynsham expected to be delivered post 2031; that is on top of the inclusion of Kilkenny Farm and Land North of Swinbrook Park. The Council should consider additional sustainable sites at the main service centres, including around Witney, to address this shortfall consistent with its spatial strategy before considering land within the AONB. This strategy of concentrating growth around the 3 main towns (in broad proportion to their size) was assessed as appropriate within the Sustainability Appraisal and no clear evidence has been provided to demonstrate a departure from this.
As part of the proposal for Land North of Swinbrook Park, which would provide 115 new homes immediately adjacent to an existing residential development, the proposal also includes a large addition to the Kilkenny Country Park for recreation use for the wider locality. This would define the settlement limits and also provide a suitable buffer of greenspace to Shilton. As part of the west of Swinbrook Road proposal, the site presents opportunities to enhance additional opportunities to walk and cycle to and from Carterton and Shilton, as well as other local benefits that have been discussed with the Town Council.

The Kilkenny Farm land, as previously mentioned, provides sustainable options to West Oxfordshire for land within Carterton for a first phase of 300 and up to 750 homes, of which (and like land west of Swinbrook Road), the 300 dwelling first phase option can be delivered within the first 5 years. The Sustainability Appraisal, which apparently addressed the whole 250 acres rather than the 750 units supported by the Kirkham Landscape Review below the 110m contour, states:

"Land to the north (Kilkenny Farm) is poorly related to the town and poorly served by public transport; a significant incursion into the open countryside; and sensitive landscape, particularly for the northern parts. It was acknowledged that a reduced development in the south-east area could potentially address landscape concerns."

We do feel this statement reflects the lack of engagement. After all, the Carterton Town Master Plan reaches a wholly different conclusion. It seems reasonable to conclude that the scale of development proposed for Kilkenny Farm would not be disproportionate considering the overall extent of Carterton. An upper limit of 750 units is consistent with WODC’s evidence base and would also address concerns regarding potential development on the northern parts of Kilkenny Farm (quoted above), which would extend into the more open landscape, which as a result is more sensitive in landscape and visual terms.

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Proposed modification- Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.

The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making.

The proposed ‘Garden Village’ is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification.

The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be
done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process.

A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.

Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.

Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.

MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.

MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.

MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.

The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from
The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.

While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.

MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.

We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council's own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district's larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough's settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which
The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.

MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.

The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.

MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPFs encouragement of environmentally sustainable development.

The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use all together. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.
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<td>1972</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>We welcome the Council’s intention to make provision to meet its full Objectively Assessed Housing Needs, and its allocation of Oxford’s unmet housing need. However, it is disappointing that the new housing proposed in villages has been allocated on a small number of sites, with little flexibility provided for more houses to come forward from small sites in these areas, other than through Neighbourhood Plans. If no Neighbourhood Plan is being prepared, as is the case in Stanton Harcourt, delivery of new homes is effectively precluded (beyond any allocated sites) until such time as the Council can no longer demonstrate a 5-year housing land supply. We believe that the Council should adopted a more flexible and positive approach. Further development in the villages would assist in realising several benefits, both locally, and in terms of delivery of the Local Plan. At the local level, the main benefit will be assisting in ensuring the continuing vitality and viability of the villages in West Oxfordshire, by supporting local shops, services and contributing to public transport provision. At a more strategic level, a larger number of smaller sites will provide greater certainty of delivery of the overall housing target. Smaller sites are less likely to give rise to landownership issues and do not normally require complex infrastructure planning and investments. Further, if any issues do arise on any particular site, there will be a greater number of alternative development options to meet housing needs.</td>
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<td>MM762</td>
<td></td>
<td>N. Potter</td>
<td>Unknown</td>
<td>Potter</td>
<td>1977</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Our client supports the Council’s approach to locating development in the right places. Charlbury is identified as a Rural Service Centre and the Main modification identifies that it should provide for a modest level of development appropriate to support their roles as rural service centre. Our client supports the Council’s ambition to deliver a greater quantum of development in the District. It is noted that the plan aims to deliver 13,200 homes over the period 2011-2031 with a further 2750 homes to meet Oxford’s unmet need. As above, this proposed level of housing delivery in the District should not be considered an absolute maximum, but instead should be viewed as a minimum target to assist in delivery of identified housing requirements. It is agreed that provision of new housing should be made in each sub-area at appropriate village locations in line with relevant policies of the Plan. The revision to this policy, in order to identify the additional housing delivery requirement across the District is, in principle, supported.</td>
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<td>MM764</td>
<td>Oxford University and Colleges</td>
<td>Oxford University and Colleges</td>
<td>-</td>
<td>Oxford University and Colleges</td>
<td>1993</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>The identification that the figures in the policy are not to be considered a ‘maximum ceiling to development’ is supported as being inline with the NPPF.</td>
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<tr>
<td>MM769</td>
<td>Rivar Ltd</td>
<td>Rivar Ltd</td>
<td>-</td>
<td>Rivar Ltd</td>
<td>2016</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Savills has been instructed by Rivar Ltd to submit written representations to the West Oxfordshire Local Plan 2021 Proposed Main Modifications document. These representations are made in respect of land at Marriott Close, Wootton-by-Woodstock. The site at Marriott Close, Wootton-by-Woodstock comprises greenfield land to the west of existing built development. The existing development adjacent to the site is located outside of the main built up area of the village. Notwithstanding the site is well located to the village edge and represents a logical extension to the village. Planning history for the site is limited. Neighbouring land uses benefit from recent planning history for residential development at the adjoining site. The site has the benefit of positive previous pre-application advice relating to a similar proposal scheme sought from West Oxfordshire District Council in February 2015, and November 2016. Rivar Ltd fully supports the Council’s ambition to delivering a greater quantum of development in the District. It is noted that the plan aims to deliver 13,200 homes over the period 2011-2031 with a further 2,750 homes to meet Oxford’s unmet need. As above, this proposed level of housing delivery in the District should not be considered an absolute maximum, but instead should be viewed as a minimum target to assist in delivery of identified housing requirements. For example, the Eynsham-Woodstock sub-area is proposed for 2,800 homes. This figure should not be seen as a maximum threshold, and the Plan would benefit from explicit clarification of this point. Notwithstanding, it is agreed that provision of new housing should be made in each sub-area at appropriate village locations in line with relevant policies of the Plan.</td>
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<td>MM771</td>
<td>Stormport (UK) Ltd</td>
<td>Stormport (UK) Ltd</td>
<td>-</td>
<td>Stormport (UK) Ltd</td>
<td>2039</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>MAIN 24 – Policy H1 Stormport support the Plan target of 15,950 homes to be provided. However, it is considered that the target should be expressed as a minimum to allow for flexibility in the delivery of housing in the District.</td>
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<td>MM772</td>
<td>Spitfire Homes</td>
<td>Spitfire Homes</td>
<td>-</td>
<td>Spitfire</td>
<td>2065</td>
<td>&gt; SECTION 5 - PROVIDING</td>
<td>Main Modification 24: Policy H1 – Amount and Distribution of Housing</td>
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<td>MM773</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>2089</td>
<td>NEW HOMES &gt; MAIN 24</td>
<td>The revision to this policy, in order to identify the additional housing delivery requirement across the District is, in principle, supported. Our client notes the increased housing delivery of 1,200 units reported to the Eynsham - Woodstock sub-area. Increasing growth within this sub-area aligns with meeting the additional unmet housing needs, closest to the source of the problem.</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>We note that the objectively assessed need for West Oxfordshire is set at 660 dwellings per annum (13,200 homes in total) and we would agree that this will result in a significant increase in the rate of delivery within the District compared to the previously historic lower rates. We acknowledge the amended wording in relation to the unmet need from Oxford City and the rationale behind the apportionment allocated to West Oxfordshire to deliver. We agree that to meet this requirement that the delivery rates will need to increase substantially to 935 dwellings per annum from 2021 to 2031 to meet this need and that this will be extremely challenging for the District to deliver. As such, we believe that as many sustainable and unconstrained sites as possible should come forward for development at the earliest possible opportunity. As set out previously within these representations, we believe the site at Hailey offers a logical and sustainable location for growth within the village within close proximity to the Main Service Centre of Witney.</td>
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<td>We strongly object to the proposal for a separate land supply calculation for the 2,750 dwellings at Eynsham - to be taken account of in the period 2021 -2031. There is nothing within the NPPF or the PPG to support this approach. The NPPF is clear that when dealing with need, it is the need of the Housing Market Area as whole which needs to be met. It is not appropriate to ‘ring-fence’ need in this manner.</td>
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<td>Housing Need and Affordability</td>
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<td>The plan is considered not to suitably address housing need despite the uplift in numbers. There has been insufficient development in the first five years (up to 2016) which is further increasing unmet need. The Council assert that the residual Liverpool method is most appropriate to address the 1,836-dwelling backlog (excluding Oxford City unmet need) from 2011-2016 rather than Sedgefield which is recognised In Planning Practice Guidance (PPG).</td>
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<td>However, in an appeal decision dated 26th July 2016 at Milton-under-Wychwood1, the Inspector concluded that &quot;Housing land supply in the District is less than 2 years. Such a shortfall must be regarded to be severe.&quot; This was based on the 'Sedgefield' method of calculation and was not contested by the Council. Nine other recent Appeals this year in the District have concluded similar shortfalls and all those decisions by the Inspectorate have used the Sedgefield approach. There is no justification supplied for using the Liverpool method.</td>
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<td>Main Modification 29 (paragraphs 5.34b) confirms that West Oxfordshire will apply the Liverpool method in calculating the 5-year housing land supply which seeks to address the under-supply over the plan period rather than the immediate 5-year period. IN016 (The Inspectors Preliminary Findings - Part 2 para 2.15) stated that WODC need to have regard for National Guidance as the Liverpool method is not mentioned. Furthermore, the Houses of Parliament Briefing Paper Number 03741 dated 25 May 2016 Planning for Housing states that Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period, thus the Sedgefield approach should be adopted. This is especially important given the severe shortfall of 1,836 homes, the serious affordability concerns in the local area (house prices 10 times lowest incomes).</td>
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<td>Alongside this context of a severe shortfall in housing delivery, the report of the Oxfordshire Growth Board Post SHMA Strategic Work Programme report2 states that:</td>
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"133) The Programme is not seeking to allocate or release sites, but has at a high level and using a common basis, through the work streams; identify the evidence of each district’s ability to absorb additional growth to meet a share of Oxford’s unmet need. It will be for each of the districts through their normal Local Plan processes to allocate sites sufficient to meet their proposed share of Oxford’s unmet need under the requirements of the Duty to Co-operate.

134) It is also important to note that the yield figures for each area of search represent estimated housing numbers to be delivered by 2031 – total capacities at a number of these sites may change through local assessment as part of the more detailed Local Plan process, taking a wider range of planning factors into account, including the potential to deliver further housing beyond 2031."

MM22 Paragraph 5.17 asserts that the delivery of unmet Oxford City housing need at Eynsham will be delivered in the period 2021 to 2031 – which would require delivery of 220 dwellings per annum from a standing start in 2021: itself highly optimistic – rather than address unmet needs also within the first 5 years of the plan period. Whilst it is not disputed that Eynsham will not deliver prior to 2021, this underlines the need for the Council to augment its housing land supply to identify and allocate additional land for housing in the short term to meet housing needs in the first half of the plan period. This is especially important given the significant shortfall of 1,836 homes, the serious affordability concerns in the local area (house prices 10 times lowest incomes) and considering the Inspector’s preliminary findings that it was his initial view that unmet need would need to be considered in calculating the 5-year land supply (Paragraph 7.6 (IN015)).

Instead the Council’s Housing Land Supply Position Statement October 2016 simply indicates that Eynsham will ‘kick in’ from 2021 onwards as ‘agreed’ through the joint work at the Growth Board: such a view is not supported by the statement above from the September 2016 OGB report which emphasises the sovereign nature of Local Plans in identifying land to address unmet need. Rather than the response to delivery new homes to meet unmet needs ‘kicking in’ in 2021, this should be seen as ‘kicking the can down the road’. Unmet need, is, by definition, unmet.

It is counter intuitive for the Council to hold the view that the present day need for housing should be addressed in 5 years’ time or beyond. The Inspector’s Preliminary Findings (IN015) confirmed that if the Council failed to consider the implications of unmet housing needs the plan would be out of date before it can be adopted. The inescapable conclusion to this is that unmet housing needs should begin to be addressed at the time of adoption of this plan: arguably now. Were that not the case, logically an early review which gives time to consider and then respond to unmet needs would be appropriate, which it is evidently not.

The Vale of White Horse Local Plan, recently adopted, commits to allocating sites to contribute towards Oxford’s unmet housing need within the Local Plan 2031: Part 2, to be submitted to the Secretary of State, within two years of adoption of the Local Plan 2031: Part 1 – i.e. by December 2018: otherwise the unmet housing needs from Oxford City will become part of its housing land supply requirement. West Oxfordshire’s approach to this issue is therefore wholly contradictory: the timing of its plan enables the Council to seize the opportunity to deliver new homes to meet unmet housing needs from the City of Oxford, yet to put this off until after 2021 will simply fail those who are presently in need of a new home. One cannot meet today’s needs tomorrow.

Furthermore, it is considered a key concern that there is too high a reliance on development which will deliver after 2021 within the plan as a whole. The Council’s Housing Land Supply Position Statement October 2016 indicates only 1,035 homes out of 8,169 dwellings on proposed allocation sites in the draft Plan will
occur prior to 2021: that is a paltry 12.6% or 207dpa. This will only address a little over half of the current backlog let alone what is needed going forward. This extreme low delivery for the first 10 years of the plan risks exacerbating affordability challenges district wide and places further stress on housing need.

When drilling down into the detail, it is proposed that the Witney sub-area (which incorporates Hailey) will provide 4,400 homes. This is made up from proposed allocations and additional sustainable sites which come forward and are available for development. It is also noted that additional sites may be allocated through Neighbourhood Plans to increase the housing supply over and above that which has been identified and planned for in the Local Plan. However, the Witney sub-area policy references windfall sites as being a potential source of supply and attributes a specific number to these. This is not the same as sites being allocated through the Neighbourhood Plan. To restrict such a source of supply solely to potential Neighbourhood Plan sites is engaging a restriction on development and treating windfall sites as engaging a prematurity argument in seeking to come forward in advance of a Neighbourhood Plan. This is not in accordance with the NPPF. Furthermore, the policy as currently drafted means that were the villages not to develop Neighbourhood Plans, then there is no way of this element of the supply being delivered. We consider it should be clarified that the 8th paragraph should be amended to read:

Provision for new housing will also be made in the remainder of each sub-area at appropriate village locations.

Given the confusion which exists between this policy and the respective sub-area policies, it is considered that the third paragraph from the end should also be deleted as again it references additional sites coming forward through Neighbourhood Plans only.

Main Modification 24, Policy H1, relates to the distribution of housing which is supported by a revised Sustainability Appraisal (SA). We consider that there needs to be reconsideration of a further uplift in housing in the Burford - Charlbury sub area (proposed housing requirement increase of 20% from 800 to 1,000 homes). Paragraph 116 of the NPPF clearly states that exceptional circumstances must be demonstrated to justify allowing major development in the AONB. This paragraph states that consideration of such applications should include an assessment of the need for the development and its impact on 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 and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area: however, that is not a reason to increase housing within the sub area. The draft plan is not consistent with national policy and has not been justified with regard to reasonable alternatives which exist to deliver development outwith the AONB, nor is it deliverable and effective in terms of proposed sites.

Savills has been instructed by Spitfire Homes to submit written representations to the West Oxfordshire Local Plan 2031 Proposed Main Modifications document. These representations are made in respect of land at Jubilee Lane, Milton under Wychwood.

The site off Jubilee Lane, Milton under Wychwood comprises greenfield land to the south of existing built development. The site is well located to the village edge and represents a logical extension to the village providing an opportunity to improve the character of the edge of the settlement. Planning history for the site is limited.

Spitfire Homes fully supports the Council's ambition to delivery a greater quantum of development in the District. It is noted that the plan aims to deliver 13,200 homes over the period 2011-2031 with a further 2750 homes in the shorter term to 2026.
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<td>MM777</td>
<td>Hook, Nockles &amp; CALA Management</td>
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<td>2102</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>homes to meet Oxford’s unmet need. As above, this proposed level of housing delivery in the District should not be considered an absolute maximum, but instead should be viewed as a minimum target to assist in delivery of identified housing requirements. It is agreed that provision of new housing should be made in each sub-area at appropriate village locations in line with relevant policies of the Plan. The revision to this policy, in order to identify the additional housing delivery requirement across the District is in principle supported. Our client notes the increased housing delivery of 200 units reported to the Burford - Charlbury sub-area.</td>
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<td>Policy H1 relates to the amount and distribution of housing for West Oxfordshire across the emerging plan period. The proposed modifications document increases the housing requirement from 10,500 homes to 15,950 homes for the period 2011-2031. The increase to the housing requirement is closer to the OAN identified within the 2014 Oxfordshire SHMA for West Oxfordshire.</td>
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<td>National Planning Policy is clear within Paragraph 14 of the NPPF which states that “local planning authorities should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.”</td>
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<td>Paragraph 17 of the NPPF states that “Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability.....”</td>
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<td>NPPF in Paragraph 47 seeks “To boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...” and in paragraph 50 to “deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</td>
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<td>* plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community...”</td>
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<td>NPPF in paragraph 158 seeks to ensure that local plans are “based on adequate, up-to-date and relevant evidence about economic, social and environmental characteristics and prospects of an area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.” In order that local planning authorities have a clear understanding of housing needs in their area NPPF (para 159) says that they should “prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:</td>
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<td>* Meets household and population projections, taking account of migration and demographic change</td>
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<td>* Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people,</td>
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people with disabilities, service families and people wishing to build their own homes); and

* Caters for housing demand and the scale of housing supply necessary to meet this demand."

Further advice in respect of assessing and meeting housing need is set out in PPG. Section 2a-003 states that "Need for housing should cater for demand of the area and identify the scale of housing to meet that demand."

In section 2a-004 it states that "The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as the limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints."

PPG (2a-007) requires local planning authorities to "assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate."

CALA are supportive of the uplift to the housing requirement for the plan period within Policy H1 which now takes into consideration Oxford City’s Housing Needs. However, concern is raised over the distribution of housing in particular land to the west of Eynsham and a new rural service centre garden village on land to the north of the A40 near Eynsham and the level of growth suggested in settlements in the AONB, particularly Burford and Charlbury. Regarding paragraph 116 of the Framework concern is raised as to whether the need for the planned level of development in these locations is appropriate given that opportunities clearly exist outside of Burford and Charlbury to help meet the District’s housing needs. Bampton is the perfect example of one such alternative location. It is also a rural service centre and without the AONB constraining its growth potential.

There appears to be a level of conflict in Policy H1 with regards to the delivery of 3,200 units to the west of Eynsham and the New Garden Village to create a rural service centre. Land to the west of Eynsham represents an urban extension of an existing rural service centre. One therefore queries why other rural service centres like Bampton cannot be considered for a higher level of growth than the 160 already committed, especially where there are no environmental designations affecting its future growth.

Suggested changes to the distribution of housing in relation to Policy H1 are suggested in the context of modification 27 in an accompanying representation.

Summary

With regards to Proposed Modification 24, the increase in the housing requirement for the plan period 2011-2031 is supported by CALA. However, concern is raised in relation to the wording which acts as a blanket policy restricting further growth in Bampton due to its existing commitments and apparent constraints.

Overall, CALA are of the view that the Proposed Modifications to the emerging Local Plan cannot be declared sound in their current format.

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<td>Kier Group</td>
<td>2111</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt;</td>
<td>Please see our earlier representations in respect of overall housing numbers, distribution and objections in respect of the two SUEs proposed.</td>
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<td>MM780</td>
<td>North A40 Land Consortium</td>
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<td>2125</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Modifications to Policy H1 set out that provision will be made for a total of 15,950 homes in the period 2011-2031. The Consortium agree with the principle of providing this level of new homes as a minimum threshold for housing delivery in the District over the plan period. The Consortium further agree to the principle of providing at least 2,750 new homes at Eynsham over the period 2021-2031 to meet Oxford City's unmet housing needs, to be delivered in part through a new Garden Village to the north of the A40. The Consortium therefore agrees with the thrust of the proposed main modification set out at Paragraph 5.21 to provide at least 2,200 new homes at the proposed Eynsham Garden Village by 2031.</td>
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<td>North Witney Land Consortium</td>
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<td>2147</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>MAIN 24 – Policy H1 – Amount and Distribution of Housing West Oxfordshire District Housing Needs The Inspector’s Preliminary Findings were published in December 2015, following the initial EIP hearing sessions. Part 1 of the Findings outlined the Inspector’s concerns in respect of the housing requirement, the needs of Oxford City and the Duty to Co-operate and identified the work streams which would need to be undertaken to address the matters raised. As part of the process to address the Inspector’s concerns and to ensure the Plan is sound, the Council held a consultation on a SHMA Partial Update in July 2016. The SHMA Partial Update concluded that the objectively assessed need for the District was 568dpa over the period 2011-2031. Although an increase above the 525dpa which had been proposed in the submission version of the Local Plan, this continued to fall significantly short of the 661 dpa advocated in the Oxfordshire SHMA (2014). The Council’s proposed modifications now seek to meet the full mid-point OAN figure advocated in the Oxfordshire SHMA, with a total of 13,200 new dwellings to be delivered over the Plan period 2011-2031 to meet the needs of West Oxfordshire. The preparation of a joint SHMA for the whole of the Oxfordshire HMA is considered to have been a significant positive step which recognises the interrelated nature of the individual local authority areas and meets the requirements of the Duty to Cooperate. The soundness of the OANs advocated in the Oxfordshire SHMA have already been the subject of rigorous testing through both the Cherwell and Vale of White Horse Local Plan Examinations and have been confirmed to be a robust and sound basis on which to base those respective Local Plan’s, as shown in the latest Vale of White Horse Inspector’s report (albeit with a 2 year ‘review clause’). We support the proposed modification to make provision for the full OAN of the District, which ensures a consistent and robust baseline is being used in order to plan for the needs of the County and is considered to be a sound basis for the preparation of the Plan. Oxford City Unmet Needs In addition to the 13,200 homes planned to be provided in order to meet the needs of West Oxfordshire, a further 2,750 homes are planned to meet Oxford City’s identified needs. The proposed 2,750 homes figure represents the recently agreed apportionment by the members of the Oxfordshire Growth Board, with the exception of South Oxfordshire District Council, at its meeting on 26th September 2016. The proposed apportionment had been determined on the basis of a report from Land Use Consultants (LUC), which provided a spatial assessment of options for accommodating the unmet needs of the City, as well other</td>
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evidence relating to economic, education and transport considerations.

It had been expected that all the authorities would confirm a Memorandum of Cooperation at the meeting on the 26th September to the effect that the six authorities 'agree' that the apportionment figures "represent the agreed apportionment". However SODC was unwilling to agree to the Memorandum on the basis that the areas of search within their administrative area included in the LUC report had not been put forward by the District Council.

Although the recognition by WODC of the need to make provision to assist in meeting Oxford City's unmet needs is supported, there remains significant uncertainty as to whether the 2,750 dwellings proposed in West Oxon is in fact the correct level of development to be planning for, particularly in the absence of a Sustainability Appraisal relating to the Growth Board’s apportionment.

The 2,750 dwelling figure is based upon the apportionment proposed by the Oxfordshire Growth Board and agreed by the majority of the LPAs, which is itself based on an assumption that the unmet needs of Oxford City totals 15,000 dwellings. This 15,000 dwellings figure has yet to be publically tested, and we envisage that the West Oxon EiP will be the first time this occurs. Notably, the Oxford City First Steps consultation (August 2016) itself appears to identify a shortfall of 22,000 rather than the 15,000 which was planned for by the Growth Board. There therefore remains a question as to whether the high level apportionment figure is correct, and consequently what implications there may be for the West Oxon Local Plan.

In refusing to agree the apportionment proposed by the Growth Board, South Oxfordshire did raise that in their view Oxford City may be able to accommodate more of its own needs than is currently being allowed for. Whether this would equate to the additional 7,000 dwellings which appear to potentially be unaccounted for at this stage, and additionally reduce the currently proposed apportionment figures would appear to be unlikely. At this stage therefore as a minimum there are 4,950 dwellings (the proposed apportionment for South Oxfordshire) for which provision is not being currently being made for within Oxfordshire, and this could potentially increase to 11,950 dwellings, if the unmet need is ultimately determined to be 22,000 dwellings rather than 15,000.

Following the Growth Board meeting on 26th September, there has been no published update as to how matters are to be progressed following the failure to agree the apportionment figures with all authorities. As such it is unclear, leaving aside the question of the true scale of Oxford City’s unmet needs, how the additional 4,950 (or at least a proportion of this assuming South Oxfordshire would be willing to accommodate some of this need) is to be provided for.

Notably the Growth Board papers for the 26th September meeting highlighted that "it remains for individual authorities to test the SHMA results and its application in their respective local circumstances and to determine whether their Local Plans can sustainably accommodate development to meet the housing need identified.” The proposed apportionment has not been subject to Sustainability Appraisal and as such there remains uncertainty that having agreed to the apportionment figures whether these authorities will in fact be able to deliver these requirements.

As such, whilst we commend West Oxfordshire for agreeing to accommodate 2,750 dwellings of Oxford City’s unmet needs and consider it to be a pro-active response which potentially complies with the Duty to Cooperate, due to the remaining uncertainties we consider a commitment should be made in the Plan to an early review of the Plan. This would provide a commitment for an early review should a need to provide for an increased number of dwellings to meet the needs of Oxford City be demonstrated. Such a commitment
Respondent ID | Respondent Organisation | Respondent Name | Comment ID | Document Full Path | Comment
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MM785 | Messrs Walker, Smith, Summerfield | Walker, Smith, Summerfield | 2163 | >SECTION 5 PROVIDING NEW HOMES > MAIN 24 | was included in the Proposed Submission Draft of the Local Plan, and it is considered that similar wording should be reinterted into the Plan to ensure it is justified and effective. We note that this approach was taken in the Vale of White Horse.

Other Matters

The Proposed Modifications to Policy H1 as currently drafted state that "provision will be made for a total of 15,950 homes in the period 2011 - 2031." This contrasts with the wording of the Submission Version of the Plan which stated that "West Oxfordshire will provide at least 10,500 new homes between 1st April 2011 and 31st March 2031."

Paragraph 14 of the NPPF makes clear that "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change." The Policy as currently drafted does acknowledge that:

"This is an indicative distribution and should not be taken as an absolute target for each subarea or maximum ceiling to limit development".

Additional sites may for example be identified through Neighbourhood Plans increasing housing supply above that which has been identified and planned for in this Local Plan.

Furthermore it is noted that Policy H2, discussed in turn below, does state that the target is to deliver "at least 15,950 new homes." As such, for consistency and to ensure the Plan is justified and effective, we would recommend that the proposed policy wording is amended to state that:

"Provision will be made for a minimum of 15,950 homes in the period 1st April 2011 to 31st March 2031."

We comment elsewhere in this Statement on the Council's proposed additional allocations to meet the housing requirement and how the requirement is to be distributed over the Plan period and as such we do not repeat these comments here.

At paragraph 5.5 of the Inspector's Preliminary Findings Part 1, it is stated that 'the SHMA's recommended figure of a need for 274 affordable dwellings per annum is justified for the period 2013-2031'. The SHMA indicates (Table 89) that to meet the objectively assessed affordable housing need 685 dwellings per annum should be planned for over the plan period. Main modifications (Main 22) indicates that the 'mid-point figure is 660 homes per year and this is defined as the objectively assessed need'. Main modifications (Main 24) to Policy H1 state that, utilising the mid-point figure of 660 homes per year, provision will be made for 13,200 homes to meet West Oxfordshire's identified housing need and a further 2,750 homes to meet Oxford City's housing need.

At paragraph 5.11 of the Inspector's Preliminary Findings Part 1, the Inspector raises concerns that an uplift in market housing has not been considered to meet the affordable housing need set out within the SHMA.

It is reasonable to conclude the vast majority of affordable housing delivery will occur as a proportion of open-market schemes and is therefore extremely dependent for its delivery upon market housing being developed. The SHMA Update, dated November 2016, indicates at paragraph 6.6 that the total net need for affordable housing is 275 dwellings per annum. Furthermore, paragraph 6.7 concludes the Council should consider an appropriate uplift to address affordable housing need.

Paragraph 159 of the NPPF clearly states that 'Local planning authorities should have a clear understanding of...
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs</td>
<td>Mrs Jacobs</td>
<td>2187</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>housing needs in their area. They should: ... address the need for all types of housing, including affordable housing. The WOLP does not provide for an uplift beyond that of the SHMA mid-point of 660 dwellings per annum. The strategic development areas are likely to provide less than the affordable housing policy requirements due to significant costs associated with the delivery of infrastructure. The Planning Practice Guidance advises at paragraph 029 (Ref ID: 2a-029-20140306) how plan makers should use the results of the affordable needs assessment: 'The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.' An uplift in the objectively assessed housing need should be considered by the Council to deliver a greater number of affordable homes to ensure the affordable housing needs of the District are met over the plan period. There is currently no careful or balanced consideration by the Council of the extent to which the gap in affordable housing provision could be narrowed by an uplift in market housing. Overall Housing Number in the Plan We support Main Modifications (MM) 22, 24 and 30 which propose that the Local Plan should provide for at least 15,950 homes in the period 2011-31, including 13,200 to meet the district’s needs and 2,750 homes as West Oxfordshire’s contribution to providing for Oxford’s unmet housing need. Soundness Reason: Positively Prepared WODC propose to use the figure of 660 homes pa as their OAN which is the mid-point figure in the SHMA. This would be sufficient to support forecast economic growth and would help to meet affordable housing needs. (For information we do not accept Peter Brett’s rebuttal to our criticisms of the methodology used in the Oxfordshire Strategic Housing Market Assessment Partial Update. It remains our view that at least 598 homes p.a. are needed to meet the labour force requirement. It is not clear how WODC justify adopting the SHMA figure of 660pa as their OAN – presumably they have decided to uplift the number of homes Peter Brett identified as necessary to support economic growth to ensure new housing makes a significant contribution to the district’s identified affordable housing needs). The inclusion of 2,750 homes for Oxford’s unmet need is in line with the Growth Board’s apportionment of unmet need and reflects the terms of the Growth Board Memorandum of Cooperation1 signed by five of the Oxfordshire councils including WODC and the County Council. The figure has been tested at a high level through the post SHMA process and shown to be deliverable.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs</td>
<td>Mrs Jacobs</td>
<td>2221</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; Appendix 2 – Education Comments</td>
<td>Bampton</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2281</td>
<td>MAIN 24</td>
<td>The SHELAA Assessment (Appendix 3), states that site 331 Backhouse Lane (which is recommended for development) is adjacent to the school rather than site 385 and this needs to be corrected, in particular as site 385 would provide potential for the school site to be expanded, while site 331 would not. In previous responses, OCC advised that further expansion of Bampton CE Primary School might be challenging. It is now considered that the school could expand further in line with the indicated scale of housing growth.</td>
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<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr</td>
<td>Murray and Blackwell</td>
<td>2305</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Para 5.21 and Policy H1 Long Hanborough should be retained as a Rural Service Centre. The proposed allocation of 1400 at North Witney has significant transport challenges to overcome due to its constrained location. The site is beyond the recommended walking distances to existing commercial bus routes and the location and accessibility of the site is challenging to directly serve with a commercially viable bus route.</td>
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<td>MM95</td>
<td>GMM</td>
<td>Miss</td>
<td>Mangley</td>
<td>248</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Chipping Norton sub-area to take 2400 homes (predominantly in Chipping Norton) when Chipping Norton currently has &lt; 3000 home, and to mitigate the air quality (let alone improve on the current above-legal levels) and manage the increased traffic flow via a road that doesn’t really take people anywhere other than Burford Rd (great if you want to head to Witney or Burford way, not great if you want to go anywhere else) when we KNOW that the traffic will travel through town, which is stop-start now because of the layout of roundabouts and traffic lights and junctions and the conservation area, and the narrow road at Horsefair and cause more pollution, because it is the diesel cars and the HGVs stopping and starting that causes the pollution (read the CN traffic survey) is ludicrous. Seriously, it is THAT bad. The sums don’t add up, so please explain why 2400 homes is GOOD for the town and how all the negatives are mitigated by the positives.</td>
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<tr>
<td>MM110</td>
<td>Lagan Homes</td>
<td>Lagan Homes</td>
<td>-</td>
<td>-</td>
<td>275</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>INTRODUCTION AND SUMMARY i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Lagan Homes who have land under their control off School Hill, Minster Lovell. The land extends to 2.5ha and is identified on the plan attached as Appendix 1 to these representations. ii. Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.</td>
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iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply.

iv. Land at School Lane is under the control of Lagan Homes, is available now and capable of delivering around 25 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing between 2016-2021 and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. Lagan Homes object to Table 4.1 and the reference to Minster Lovell ‘south of the Burford Road’ (MM14). There is no reason why Land at School Lane and north of the Burford Road is in anyway less sustainable in locational terms than other land on the edge of the village.

vi. The following representations provide further information on the Land at School Lane and should be read in conjunction with Edgars Limited’s representations regarding housing supply which are not repeated in detail in these representations.

1.0 LAND AT SCHOOL LANE, MINSTER LOVELL
1.1 Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that Land at School Lane should be allocated for around 25 homes to help address this deficiency.

Site and Surrounding Area

1.2 The site lies adjacent to the village of Minster Lovell and the B4047 Burford Road some 3 miles (5km) west of Witney and 4 miles (6km) north of Carterton. There is an off-road cycle path to Witney (within reasonable cycling distance) and an hourly bus service to Witney. The village also has a number of amenities including a small shopping parade, Post Office, Primary School, Public House and Butcher. There are also several businesses along the Brize Norton Road.

1.3 The site is a single 2.5ha open grassland field immediately north of the Burford Road and west of School Lane. It is part of the north facing slope of the Windrush Valley. A site plan is attached at Appendix 1.

1.4 The site lies some 1m below the Burford Road and is screened by a strong hedgerow along the road frontage such that the open nature of the site is not readily perceptible from this frontage.

1.5 On the southern side of Burford Road is some modern development which is also mostly set back from the road frontage. The White Hart Public House (Listed Grade II) along with the War Memorial and Methodist Church frame the Brize Norton Road junction opposite the site. 1.6 There is a farm access in the south western corner and a strong hedgerow bounds to the west along with a Thames Water pumping station.

1.7 School lane bounds to the east. The lane lies some 1.5m below the site and views are filtered through by
boundary vegetation.

1.8 School Lane leads to Little Minster. College Farm within Little Minster lies at the southern end of the site and there is a scattering of modern and historic buildings along School Lane and School Hill.

1.9 School Lane and College Farm fall within a Conservation Area. A Conservation Area Appraisal has been prepared by the Council. The site is not identified in the appraisal as where there is a notable sensitive view into or out of the Conservation Area. Buildings adjacent the site are identified as Locally Listed including College Farm and the Old School.

1.10 The site forms part of the northern slopes of the Windrush Valley and falls within the Cotswold AONB. The West Oxfordshire Landscape Assessment (WOLA) identifies the site as part of the Upper Windrush Character Area and part of Semi-Enclosed Valley Side Farmland which is noted to be sensitive to views within an across the valley but where there may be limited opportunities to accommodate small scale development within a strong landscape structure. The settlement pattern identifies scattered villages along the valley with Charteville (New Minster) a notable exception being sited on higher land.

1.11 The site is well screened from the Burford Road, but there are some more immediate views through boundary hedgerows from School Lane. The site is appreciable but not prominent in middle distance views back from the opposite side of the valley just south of Ashhall Leigh. From here existing dwellings at Little Minster and north of the Burford Road are well screened by existing trees.

1.12 There is no planning history of direct relevance to the site. The site lies within Flood Zone 1 Low Risk.

1.13 Access is available to School Lane and to the Burford Road. Further technical work is underway to establish the most appropriate access point.

1.14 Lagan Homes have only recently acquired an interest in the site and as such the site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELAA). Key Planning Site Considerations

1.15 Lagan Homes are in the process of undertaking technical and development design work to inform a planning application and this is likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as of particular relevance to the potential allocation of the site.

The principle of housing development in Minster Lovell, north of the Burford Road

1.16 Minster Lovell is identified as a village in the Local Plan 2031. Draft WOLP Policy H2 permits new housing adjacent to villages to meet housing needs. As such housing development on the site would be acceptable in principle.

1.17 Draft Policies H2 and WIT4 seek delivery of 4,400 homes in the Witney Sub Area including Minster Lovell. Delivery is proposed through three Strategic Development Areas (SDAs - West, East and North Witney) each with strategic
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<td>1.18 There is residual windfall requirement of 304 homes within the Witney Sub–Area.</td>
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<td>1.19 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which will likely result in continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead in times of SDAs, addressing the current supply deficiencies is best achieved through allocating additional non-strategic developments such as Land at School Lane, Minster Lovell.</td>
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<td>1.20 Land at School Lane lies adjacent to Minster Lovell, close to amenities and public transport links. The village bus stops, public house and shops are located on the opposite site of the Burford Road to the site in very close proximity. The village school lies within 500m to the south. The site is also within cycling distance of the West Witney employment areas (2km) and Witney Town Centre (5km). In locational terms, it is sustainable. Indeed, the site lies closer to village amenities than the proposed allocation west of the village.</td>
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<td>1.21 It is noted that Table 4.1 of the plan includes Minster Lovell as a village within the settlement hierarchy but this has been modified to (MM 14) to include reference to Minster Lovell ‘south of the Burford Road’. Lagan Homes object to this modification.</td>
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<td>1.22 In Edgars opinion, the development of Land at School Lane and north of the Burford Road can comply with Policy H2 in being adjacent to a village in the settlement hierarchy.</td>
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<td>1.23 There is no reason why land at School Lane, north of the Burford Road, is in any way less sustainable in locational terms than other land adjoining the village. Indeed, land at School Lane is in closer proximity to many of the villages amenities, including the school, shops and public house than other land on the edge of the village.</td>
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<td>Village character, AONB landscape and Conservation Area</td>
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<td>1.24 Draft Policy OS2 Locating development in the right places states that villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. Development should form a logical complement to the settlement pattern, protect landscape character and settlement identity.</td>
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<td>1.25 The site does not appear to have been part of the historic Chartist settlement for which Minster Lovell is known. The site does lie within the Cotswolds AONB and adjacent to a Conservation Area.</td>
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<td>1.26 The site is not identified in the Council’s Conservation Area appraisal as where there is a notable sensitive view into or out of the Conservation Area.</td>
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<td>1.27 Views of the site are already filtered by vegetation and topography. The WOLA identifies that this area of the Windrush Valley can accommodate development within a strong landscape structure. Indeed, in views from across the valley, existing landscape features act as a screen to existing dwellings on the Burford Road.</td>
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<td>1.28 The setting of the Conservation Area and AONB can be preserved and enhanced through a low density</td>
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but high quality development within a strong and extensive landscape structure. Although the extent of the land is 2.5ha, only around 25 dwellings are proposed leaving significant scope for open space and landscaping.

1.29 In Edgars opinion, a development of this scale does not comprise ‘major’ development for the purposes of NPPF paragraph 116 and that a development within a strong landscape structure will not have a significant impact on the landscape and scenic beauty of the wider AONB.

1.30 A low density development within a strong landscape structure will also respects the settlement pattern and separate identities of Little Minster and Minster Lovell.

1.31 Although further work is being undertaken, Edgars consider that development can be achieved on the site which makes an important contribution to meeting housing land supply in a sustainable location, without significant impact on the settlement character, AONB or adjoining Conservation Area.

1.32 Further detailed technical information and development design work is likely to be available during the next stages of the WOLP 2031 Examination.

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<td>MM215</td>
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<td>Hannah Kedward</td>
<td>Mrs Kedward</td>
<td>419</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>I believe the Local Plan to be unsound with respect to the increase in housing numbers in the Chipping Norton sub-area from 1800 to 2400 (Main 24) and in particular the increase in numbers at the Tank Farm site from 600 to 1400 (Main 27) for a number of reasons, which I set out below.</td>
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<td>- Firstly, there is mention in Main 24 of the new distribution meeting an identified housing need. However, Bellway Homes, who have now opened their development on Walterbush Road which consists of a few hundred homes, are really struggling to sell their houses. This would suggest that there is not a demand in Chipping Norton of the numbers expressed in the Local Plan.</td>
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<td>- Secondly, the infrastructure in Chipping Norton is already struggling to meet the demands of the current population and cannot sustain the extra numbers suggested in the modifications. On rainy days, the sewers in the middle of the town near the Fox Hotel, back up and flood the road with unsanitary water, which is detrimental to health. The town fire service has been downgraded to one fire engine, and the community hospital has also recently been downgraded and is no longer run by the NHS.</td>
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<td>- Another serious concern regarding infrastructure is the extra pressure that would be put on the town’s roads. The road system in Chipping Norton is unfortunately flawed as both ends of the main road through town suffer from junctions that are difficult to navigate and very small disruptions can result in the traffic backing up all the way through town. The proposed eastern link road (Main 62) will do very little to relieve the pressure on the centre of town. I frequently run in the Chipping Norton area and it is clear that the vast majority of through-traffic is on the A44 and very little in on the A361. Therefore traffic using the link road will predominantly be coming back into town either on Burford Road or London road and will enter the town at the difficult junctions mentioned previously. Whilst a small amount of traffic may be taken out of the town centre, the figures in the Local plan are clearly inflated and in no way will the link road mitigate the extra traffic caused by the new proposed housing numbers. A ten minute traffic survey is unlikely to give accurate results, and it is not clear what the extra restriction measures mentioned in the Plan might be, and whether they are at all feasible. Given that the Town Council has been trying to reduce air pollution in Chipping Norton for many years, this would suggest that there are no restriction measures that could be enforced, otherwise they would already be in place.</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>542</td>
<td></td>
<td>MAIN 24, Policy H1</td>
<td>Not sound</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Regarding the allocation of the 15,950 new homes, I am impressed by the idea presented by Roger Thomas in 'The Witney Gazette' of 30 November, namely: &quot;if you take every village in West Oxfordshire and build a dozen houses, you'll get a lot of houses but without a lot of problems . . . smaller developments instead of larger ones would make everybody happy, because otherwise it's going to ruin a lot of the villages in West Oxfordshire.&quot; This is a good starting-point. As it happens, some places are already planning more houses, notably Eynsham (see earlier drafts of the Eynsham Neighbourhood Plan); so if Roger Thomas's suggestion looks as though it can't make up the numbers, the gap could be filled by pre-existing neighbourhood plans in Eynsham and elsewhere. This approach would be far less of a challenge to sustainability.</td>
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<tr>
<td>MM315</td>
<td>Richard Gwinn</td>
<td>-</td>
<td>Gwinn</td>
<td>566</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>his modification increases significantly the number of properties to be built in the Chipping Norton SDA. This is backed up by unsound evidence and is not appropriate to the existing community. In particular:</td>
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<td>a) Part of the Vision in section 3.2 is to &quot;play a role in helping to meet wider needs, without significant change to the intrinsic character of the District.&quot; Increasing the population of the town by 50% will inevitably change its character. Especially as the driver for the increase is the need to house those working in Oxford, so turning a working town into a dormitory town.</td>
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<td>b) Core Objective CO2 is to &quot;Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.&quot; This fails for the same reasons as the Vision statement.</td>
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<td>c) Core Objective CO3 is to &quot;Promote safe, vibrant and prosperous town and village centres and resist proposals that would damage their vitality and viability or adversely affect measures to improve those centres.&quot; Whilst a modest increase in population will help the town, this huge increase, aimed at commuters into Oxford, will be detrimental. The plan mentions that the proposed development is within walking and cycling distance of the town centre, although it offers no evidence to support this. I visit the town centre most days and have never seen more than one bicycle in the cycle parking there. The area around the town is</td>
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too hilly for most of the population to cycle. A straw poll of people living in the Parkers Circus estate (which is closer to the town centre than is the SDA) indicates that none walk when going into town to do their shopping. These were all fit, active people. The town centre is also not safe. In the last few years, people have been killed by passing traffic while on the pavement at Horsefair. The proposed link road appears to be a "road to nowhere" as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this relief road. This increase in traffic will also affect air quality, which is already at illegal levels.

d) Core Objective CO4 is to "Locate new residential development where it will best help to meet local housing needs and reduce the need to travel." Policy T1 – Sustainable Transport says that "Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton." The increase proposed in the modification is mainly to serve Oxford. There is no train link to Oxford. The bus to Oxford takes over an hour and is infrequent. The bus service from Kingham Station does not wait if a train is delayed, resulting in a possible two-hour wait for the bus that meets the next train. I see no solution to this problem as buses have to keep to timetables. Everyone I know has stopped using this bus, resulting in more car journeys and a station car park that can’t cope. The alternative is to travel to the station by driving through country lanes and the village of Churchill in contravention of Policy T1. The increased local traffic will make air quality worse. There is nothing in the proposed plan to solve these problems.

e) The proposed plan states in para 7.74 that "In Chipping Norton public car parking spaces in the town centre are insufficient to meet current needs." There is nothing in the proposed plan to solve this problem.

**MM357**

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<td></td>
<td></td>
<td>Tony Bovey</td>
<td>Mr Bovey</td>
<td>669</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Eynsham: scale of proposed development is too great. The village could not cope with this quantum of development. The western SDA should be reduced in size, provided a western distributor road is built first. The Oxford overspill element should be part of the Garden Village, thereby accelerating implementation, facility and infrastructure provision (especially public transport and access to enlarged Hanborough Station) and social integration and community development.</td>
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**MM363**

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<td></td>
<td></td>
<td>Oxford City Council</td>
<td>Ms Dell</td>
<td>680</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Housing Target West Oxfordshire’s revised housing target has been increased from 10,500 to 15,950. This does now appear to fully meet their OAN target from the SHMA together with the portion of Oxford’s unmet housing need (2,750) to 2031 agreed at the Growth Board Meeting in September 2016. This approach does properly reflect the success of the joint working arrangements between the City Council and West Oxfordshire. Engagement between the two Councils has continued through the bilateral joint work. This serves to show how West Oxfordshire are fully meeting their ‘duty to co-operate’ with the City Council. Support: In addition support in principle is given to Main Mod 24 Policy H1 (Amount and distribution of housing) in seeking to positively meet the housing needs of West Oxon together with an agreed proportion of the ’unmet’ needs of Oxford. Objection: The principle concern however is deliverability. There does seem to be a real challenge ahead for West Oxfordshire to be able to deliver the number of housing being proposed, based on past housing trends and delivery rates.</td>
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<td>MM374</td>
<td>Carillion Capita</td>
<td>Jeremy Flawn</td>
<td>Mr</td>
<td>Flawn</td>
<td>719</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>OCC P&amp;F supports the identification of Eynsham 'Garden Village' and the proposed urban extension to the west of Eynsham. OCC P&amp;F supports the recognition that a significant proportion of the District’s needs will be met in the Main Service Centres including Chipping Norton. OCC P&amp;F supports the increases for the Chipping Norton sub-area from 1800 to 2400 homes, and for the Eynsham - Woodstock sub-area from 1600 to 2800 dwellings. OCC P&amp;F further supports the identification of the provision of a further 2750 dwellings in the Eynsham-Woodstock sub-area to provide for Oxford unmet housing need over the plan period.</td>
</tr>
<tr>
<td>MM251</td>
<td>Andrew Garbutt</td>
<td>Mr</td>
<td>Garbutt</td>
<td>735</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>Sub-Areas Ø Witney Sub-Area Witney appears to have suffered a higher increase in houses than Carterton in this latest draft of the Plan. However, the target is now more in line with the town's size and facilities. We do not support the high target planned at Witney, as we do not support the total target at all. However, we are aware that Witney residents wish for some of their target to be diverted to Carterton. This is not equitable, as explained below and if Witney North is not suitable, then another site in Witney must be found to make up the shortfall. Ø Eynsham Sub-Area See above regarding Oxford overspill. Ø Other Sub-Areas We have no specific comments, as we don't know enough about the sites, but we would say in general that historic rural character must be maintained. We would also point out that Burford (although on the A40) is without a decent public transport service, whereas other centres have train stations and good bus links. This must be taken into account.</td>
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>758</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>MAIN 24 Policy H1 Amount and Distribution of Housing: Stagecoach notes and welcomes that the Council has now accepted the evidential basis set out in the Joint SHMA produced on behalf of all the Authorities within the Oxford and Oxfordshire Housing Market Area in 2014. As a major local employer as well as a local service provider, Stagecoach welcomes and supports the commitment to ensuring the housing demand is met and that adequate provision is being made for a full range of housing tenures within the District. This will help ensure that essential public services services, including public transport, are much more likely to benefit from adequate labour supply. This is vital to help ensure that these services can continue to be delivered and enhanced to serve the District and surrounding areas in future. Stagecoach notes and recognises the logic for significant additional new development at the largest settlements in the District. As well as the development proposed at Eynsham, to meet endogenous needs as well as that arising from Oxford City, Stagecoach notes that significant further development is proposed for Chipping Norton and Witney.</td>
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<td>MM388</td>
<td>Ainscough Strategic Land</td>
<td>Ainscough Strategic Land</td>
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<td>Ainscough Strategic Land</td>
<td>853</td>
<td>&gt; SECTION 5 - PROVIDING NEW</td>
<td>3. OVERALL STRATEGY AND PROVIDING NEW HOMES Policy OS2 – Locating Development in the Right Places (MM16)</td>
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3.1 The Submission Draft Local Plan (May 2015) contains core objectives to help guide the development of the District. Core objectives C01, C02 and C04 place significant emphasis on locating development in appropriate locations where it can meet local needs and reduce the need to travel. These core objectives are taken forward into a defined settlement hierarchy and a development strategy set out by Policy OS2 - Locating Development in the Right Places, which is effectively the plans spatial distribution policy. Policy OS2 is therefore clearly a major policy which goes to the very heart of the Local Plan. Policy OS2 is subject to a major modification (Modification 16).

3.2 Our principle issue with the revised policy is the extent to which it has been modified which results in a very different plan to what was submitted. We have raised a number of issues with regard to the manner in which this policy has been modified from a procedural perspective in Section 2.

3.3 Regarding the revised Policy OS2 itself, we continue to support the identification of the three main service towns as the principle focus for development, including Chipping Norton. However, it is now clear that Eynsham will effectively become a settlement that will have a higher population than Chipping Norton and Carterton. In effect, it will become the second largest settlement in the District. We do not believe this is consistent with the long-established ‘three towns’ strategy and this therefore has implications for the Local Plan as a whole.

3.4 Whilst we note that a wider dispersed option was tested through the SA, there does not appear to have been an option that looked specifically at dispersed growth option in the eastern part of the district, which could have considered For example, an alternative option to targeting growth towards the settlement of Eynsham could have been to consider additional growth spread across the villages to the Eynsham-Woodstock sub area of the District and perhaps areas to the east of Witney, Duckington, Hailey, Finstock, Stonfield and Charlbury. Dispersed growth across these settlements would appear to be a potential option to meet Oxford’s unmet needs.

3.5 ASL support the recognition that further allocations may need to be made through Neighbourhood Plans in relation to villages but note that should it become evident that the Local Plan is not delivering, there will need to be sufficient policies and triggers within this Local Plan to require an early review, as the burden to meet needs cannot simply be left to local communities.

Policy H1 – Amount and Distribution of Housing (MM21 to MM24)

3.6 Regarding MM21, we do not dispute the position that the level of growth needs to considered against associated impacts, but we are not convinced that ‘growth needs to be managed in order to prevent significant change to the intrinsic character of the District’ is the correct term to use here as the barometer to which impact will be considered. Indeed, the modified Plan proposes significant change to the character of some areas (i.e. Eynsham). The test has to be if the meeting needs would significantly and demonstrably outweigh the benefits, as set out at paragraph 14 of the NPPF.

3.7 With regard to the overall quantum of housing now being proposed as part of MM22, we can confirm that we support the evidence base conclusions on housing requirements, which have been placed within the Modified Policy H1 (MM24). ASL support the 15,950 dwelling requirement overall, which comprises of 13,200 homes for West Oxfordshire and 2,750 homes for Oxford’s unmet needs that are now enshrined in this policy.

3.8 ASL do not take specific issue with the proposed distribution of new homes. Indeed, we support the requirement for the Chipping Norton sub area at 2,400 new homes over the plan period and notwithstanding
our points regarding statutory requirements in relation to the preparation of a Local Plan (as set out in Section 2), we do not take particular issue with the spatial distribution that is being proposed, we just do not feel such a major change can be enveloped into the current process without serious risk of by-passing key requirements of the law when preparing a Local Plan. Put simply, we thing the changes have gone a step too far to be incorporated in to this plan as modifications post submission of the plan.

3.9 The increased housing requirement within each of the districts sub-areas is set out in Table 1 (ATTACHED). The housing requirement for the District has gone up by 51%, which has then led to significant changes to the spatial distribution of development.

3.10 The Eynsham-Woodstock sub-area requires 243% more homes that originally envisaged within the Submission Draft Local Plan, which perfectly highlights the substantial change to the distribution of development that is now being promoted.

3.11 Chipping Norton’s requirement has also increased by 50% and as noted above we support this as it brings it more in line with requirements for the other three main towns (whilst noting Chipping Norton is the smallest of the three towns). However, as noted in Section 2, in proposing this increase in housing numbers for the settlement, the Council have only considered one option for delivering this number of new homes through the SA by increasing the size of the Tank Farm Site (SDA). 

3.12 We note the other areas have not increased as much and even in those instances, we note the SA has tested various site options for the increased growth.

3.13 In terms of other issues with the revised policy, we object to the notion that the Garden Village should be regarded as a free standing settlement. It isn’t and is clearly related and connected to Eynsham, with the site and urban boundaries adjoining and the entirety of the site falling within Eynsham Parish.

3.14 We continue to support the final paragraph in Policy H1 which confirms the Council will monitor development annually to ensure that the overall strategy is being delivered.

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| MM399         | Hailey Parish Council   | Graham Knaggs    | Mr               | Knaggs            | 868       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 24 | Overall Housing numbers
The overall housing numbers in the Local Plan fail to take account of the 467 dwellings that have been approved on appeal during 2016 (source REPORT OF THE HEAD OF PLANNING AND STRATEGIC HOUSING ON PLANNING APPEALS PERFORMANCE AND LESSONS FROM 2016 dated 21 November 2016 submitted to WODC Uplands subcommittee meeting on 12th December 2016)

Major housing schemes approved on appeal in 2016 - 467 dwellings in total:
Witney Rd, Long Hanborough 169 dwellings
Newland St, Eynsham 13 dwellings
High St, Milton 62 dwellings
Eynsham Nursery and Garden Centre 77 dwellings
Land at New Yatt Rd, N Leigh 76 dwellings
Land east of Nethercote Road, Tackley 70 dwellings
In addition, since 1st September 2016, WODC Planning Committees have approved a further 663 dwellings that are not included in the WODC Main modifications of the Local Plan 2031: Major housing schemes approved by WODC Planning Committees


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<tr>
<td>MM414</td>
<td>Milton Under Wychwood Parish Council</td>
<td>Milton Under Wychwood Parish Council</td>
<td>Mrs</td>
<td>Miller</td>
<td>916</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>* &quot;Milton under Wychwood Parish Council are concerned that West Oxfordshire District Council has been urged to accept a housing target that cannot be reached without causing irrevocable harm to the Cotswold AONB. An inappropriate housing estate has already been approved on appeal, in a green field site adjacent to our village. The Inspector cited the failure of WODC to provide a 5 year land supply, as an &quot;exceptional circumstance.&quot; So we are very concerned that this extremely challenging housing target may not be met. Our village will then be exposed to land speculators seeking to build in our surrounding(AONB) countryside. And once again, that will be cited as &quot;exceptional circumstances&quot;.</td>
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<td>MM419</td>
<td>Environment Agency</td>
<td>Joe Callard</td>
<td>Mr</td>
<td>Callard</td>
<td>930</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</td>
<td>We note that the modifications increase the overall housing requirement and allocate more sites. As raised in our original letter the growth proposed within the Plan places an increase in loading on the foul drainage infrastructure within the district. The increase in housing requirement in this proposed modification further increases loading and we would expect evidence to demonstrate sufficient capacity in the sewage network and treatment works. We are pleased to see that a Water Cycle Study has been undertaken and we are currently in the process of reviewing this.</td>
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<td>MM425</td>
<td>Carterton Construction</td>
<td>Carterton</td>
<td>-</td>
<td>Carterton</td>
<td>958</td>
<td>&gt; SECTION 5 - PROVIDING</td>
<td>Main 24 – Policy H1 – Amount and Distribution of Housing West Oxfordshire District Needs</td>
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- Since 1 Sep 2016 – 663 in total
- Land at Downs Road, Curbridge 270 dwellings
- Land west of Thornbury Road, Eynsham 160 dwellings
- Land to the Rear of 15 & 16 Woodstock Road, Charlbury 13 dwellings
- Land between Wychwood House and Malvern Villas, Freeland 41 dwellings
- Land north of New Yatt Road, North Leigh 40 dwellings
- Land off Well Lane, Curbridge 14 dwellings
- Land north of Springfield Oval * 75 dwellings
- Land at former Stanton Harcourt airfield, Stanton Harcourt* 50 dwellings
- * Officer recommendation is to approve subject to Legal Agreement

A total of 1,130 dwellings are identified above - none of which are captured in the Main Modifications to WODCs Local Plan 2031. This additional volume demonstrates that a development of the magnitude of North Witney is not required to meet the overall housing requirements of the Local Plan.

As the most problematical and contentious element of plan is the North Witney housing proposal for 1,400 houses, it is proposed that this development is preferentially chosen for deletion from WODC’s Local Plan 2031 and the balance of 270 houses reallocated to the South Witney site.
2.7 The Inspector's Preliminary Findings were published in December 2015 following the initial EIP hearing sessions. Part 1 of the Findings outlined the Inspector's concerns in respect of the housing requirement, the needs of Oxford City and the Duty to Cooperate and identified the work streams which would need to be undertaken to address the matters raised.

2.8 As part of the process to address the Inspector's concerns and to ensure the Plan is sound, the Council held a consultation on a SHMA Partial Update in July 2016, which our clients responded to. The SHMA Partial Update concluded that the objectively assessed need for the District was 568dpa over the period 2011-2031. Although an increase above the 525dpa which had been proposed in the submission version of the Local Plan, this continued to fall significantly short of the 661 dpa advocated in the Oxfordshire SHMA (2014).

2.9 The Council's proposed modifications now seek to meet the full mid-point OAN figure advocated in the Oxfordshire SHMA, with a total of 12,200 new dwellings to be delivered over the Plan period 2011-2031 to meet the needs of West Oxfordshire. The preparation of a joint SHMA for the whole of the Oxfordshire HMA is considered to have been a significant positive step which recognises the interrelated nature of the individual local authority areas and meets the requirements of the Duty to Cooperate. The soundness of the OANs advocated in the Oxfordshire SHMA have already been the subject of rigorous testing through both the Cherwell and Vale of White Horse Local Plan Examinations and have been confirmed to be a robust and sound basis on which to base those respective Local Plan's, as shown in the latest Vale of White Horse Inspector's report (albeit with a 2 year 'review clause').

2.10 We support the proposed modification to make provision for the full OAN of the District, which ensures a consistent and robust baseline is being used in order to plan for the needs of the County and is considered to be a sound basis for the preparation of the Plan.

Oxford City Unmet Needs

2.11 In addition to the 12,200 homes planned to be provided in order to meet the needs of West Oxfordshire, a further 2,750 homes are planned to meet Oxford City's identified needs. The proposed 2,750 homes figure represents the recently agreed apportionment by the members of the Oxfordshire Growth Board, with the exception of South Oxfordshire District Council, at its meeting on 26th September 2016. The proposed apportionment had been determined on the basis of a report from Land Use Consultants (LUC), which provided a spatial assessment of options for accommodating the unmet needs of the City, as well other evidence relating to economic, education and transport considerations.

2.12 It had been expected that all the authorities would confirm a Memorandum of Cooperation at the meeting on the 26th September to the effect that the six authorities 'agree' that the apportionment figures "represent the agreed apportionment". However SODC was unwilling to agree to the Memorandum on the basis that the areas of search
2.13 Although the recognition by WODC of the need to make provision to assist in meeting Oxford City's unmet needs is supported, there remains significant uncertainty as to whether the 2,750 dwellings proposed in West Oxon is in fact the correct level of development to be planning for, particularly in the absence of a Sustainability Appraisal relating to the Growth Board's apportionment.

2.14 The 2,750 dwelling figure is based upon the apportionment proposed by the Oxfordshire Growth Board and agreed by the majority of the LPAs, which is itself based on an assumption that the unmet needs of Oxford City totals 15,000 dwellings. This 15,000 dwellings figure has yet to be publically tested, and we envisage that the West Oxon EiP will be the first time this occurs. Notably, the Oxford City First Steps consultation (August 2016) itself appears to identify a shortfall of 22,000 rather than the 15,000 which was planned for by the Growth Board. There therefore remains a question as to whether the high level apportionment figure is correct, and consequently what implications there may be for the West Oxon Local Plan.

2.15 In refusing to agree the apportionment proposed by the Growth Board, South Oxfordshire did raise that in their view Oxford City may be able to accommodate more of its own needs than is currently being allowed for. Whether this would equate to the additional 7,000 dwellings which appear to potentially be unaccounted for at this stage, and additionally reduce the currently proposed apportionment figures would appear to be unlikely. At this stage therefore as a minimum there are 4,950 dwellings (the proposed apportionment for South Oxfordshire) for which provision is not being currently being made for within Oxfordshire, and this could potentially increase to 11,950 dwellings, if the unmet need is ultimately determined to be 22,000 dwellings rather than 15,000.

2.16 Following the Growth Board meeting on 26th September there has been no published update as to how matters are to be progressed following the failure to agree the apportionment figures with all authorities. As such it is unclear, leaving aside the question of the true scale of Oxford City's unmet needs, how the additional 4,950 (or at least a proportion of this assuming South Oxfordshire would be willing to accommodate some of this need) is to be provided for.

2.17 Notably the Growth Board papers for the 26th September meeting highlighted that "It remains for individual authorities to test the SHMA results and its application in their respective local circumstances and to determine whether their Local Plans can sustainably accommodate development to meet the housing need identified." The proposed apportionment has not been subject to Sustainability Appraisal and as such there remains uncertainty that having agreed to the apportionment figures whether these authorities will in fact be able to deliver these requirements.

2.18 As such, whilst we commend West Oxfordshire for agreeing to accommodate 2,750 dwellings of Oxford City’s unmet needs and consider it to be a pro-active response which potentially complies with the Duty to Cooperate, due to the remaining
uncertainties we consider a commitment should be made in the Plan to an early review of the Plan. This would provide a commitment for an early review should a need to provide for an increased number of dwellings to meet the needs of Oxford City be demonstrated. Such a commitment was included in the Proposed Submission Draft of the Local Plan, and it is considered that similar wording should be reinserted into the Plan to ensure it is justified and effective. We note that this approach was taken in the Vale of White Horse.

Other Matters

2.19 The Proposed Modifications to Policy H1 as currently drafted state that “provision will be made for a total of 15,950 homes in the period 2011 – 2031.” This contrasts with the wording of the Submission Version of the Plan which stated that “West Oxfordshire will provide at least 10,500 new homes between 1st April 2011 and 31st March 2031.”

2.20 Paragraph 14 of the NPPF makes clear that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” The Policy as currently drafted does acknowledge that: “This is an indicative distribution and should not be taken as an absolute target for each sub-area or maximum ceiling to limit development. Additional sites may for example be identified through Neighbourhood Plans increasing housing supply above that which has been identified and planned for in this Local Plan.”

2.21 Furthermore it is noted that Policy H2, discussed in turn below, does state that the target is to deliver “at least 15,950 new homes.” As such, for consistency and to ensure the Plan is justified and effective, we would recommend that the proposed policy wording is amended to state that: “Provision will be made for a minimum of 15,950 new homes in the period 1st April 2011 to 31st March 2031.”

2.22 We comment elsewhere in this Statement on the Council’s proposed additional allocations to meet the housing requirement and how the requirement is to be distributed over the Plan period and as such we do not repeat these comments here.

Main 25: Housing Delivery Paragraph 5.25

3.22 The section entitled ‘Homes Already Built’ purports to demonstrate that the Council has been doing all that it can to facilitate delivery of housing, through reference to a ‘healthy supply of planning permissions and resolutions to grant’. The inference within the paragraph is that the poor performance in terms of actual delivery of housing is the fault of conditions in the housing market and a ‘lack of urgency from the development sector’. The average rate of delivery since the start of the Plan period is 293 dwellings per annum, considerably less than required to meet the overall OAHN.

3.23 What there appears to be little acknowledgement of is the continued reliance on sites that are beset with implementation challenges that have not been addressed satisfactorily. This is manifest at Witney and Carterton, where large scale sites have not been delivered as a consequence of infrastructure delivery issues and failure to complete S106 agreements. More detailed comments are made under the Witney and
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1444</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 25</td>
<td>Land-banking and the Five Year Housing Supply</td>
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Permissions in West Oxfordshire have always been strong and currently the pipeline is buoyant. Delivery by developers on the large sites remains slow however and supply is controlled by them. Clause 5.25 notes that the market has been flat and that there has been a lack of urgency by developers. This rather supports the argument that demand and need (at least for market housing) are in fact less than the SHMA target. After all, developers only proceed when demand is strong, so that profit can be maximised. Unless developers deliver, WODC will always struggle to demonstrate a 5 year supply and so will remain vulnerable to speculative and harmful applications. The problem will be worse if the target is set above demand level i.e. the higher the target, the more likely this is to happen. Should delivery lag behind permissions leaving a gap in the 5 year supply, this will increase land banks and developer share values, but it won’t help the District and in particular won’t provide the affordable housing that is undoubtedly needed, since affordable housing relies on market housing delivery. 

WODC is claiming a 5 year supply, which CPRE supports. No doubt developers will argue against it, but with permissions remaining strong, the lack of delivery is down to the developers themselves and they should not use this as justification for more allocations. CPRE therefore suggests a ‘use it or lose it’ policy with a set timeframe and deadline, to avoid land-banking by developers.


2.21 We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.

Sources of Supply

2.22 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED)

2.23 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period.

2.24 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

2.25 The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how...
this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

2.26 The revised Policy as currently drafted states:

"With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

2.27 The NPPG is clear in its guidance to LPAs (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.28 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

2.29 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.30 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.31 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 25</td>
<td>Housing Delivery</td>
<td>Objection is made to MAIN25 (paragraph 5.25) which should be changed to reflect the total OAN of 16,510 homes (West Oxfordshire District OAN of 688dpa plus 2,750 unmet need from Oxford City) to ensure the Local Plan is consistent with national policy and positively prepared.</td>
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<td>MM735</td>
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<td>Braemar Property Developments</td>
<td>1723</td>
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<td>The Council confirm that there is a significant backlog of 1,836 homes amount to approximately 3 years’ worth of housing supply when set against a requirement from 2011 of 660 homes. Part of the reason for this backlog, alleged by the Council at Paragraph 5.25 of the Plan, is a lack of urgency in bringing forward strategic sites. This validates our objections set out above at main 23 and main 24 in respect of the fragility of Sustainable Urban Extensions and that these should not be relied upon in terms of delivering a five year housing land supply or overall numbers in the Plan period.</td>
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Having recognised a significant backlog at Main Modification 25, the Plan does not identify how it intends to deal with the backlog. This is a failing of the Plan and would lead to repeated debates on a planning application by planning application basis as to the quantum of the backlog at any given point in time; whether a 5% or 20% buffer should be applied to the backlog on the basis of persistent underperformance; and whether the backlog should be addressed in the next five years of the Plan or spread across the Plan period.

To plan for predictability, Main 25 should identify how the backlog is to be addressed and by when.

This could be by allocating additional smaller sites of sufficient scale as to make a meaningful contribution to housing delivery but not so great as to be burdened by a combination of delays to the planning system and infrastructure delivery such that the backlog can be dealt with promptly within the next five years of the Plan period as required by the PPG.

We note the Council’s concerns about the slow delivery of the strategic sites. This is why it is important that the Council does not rely too much on a few strategic sites to deliver the housing requirement, especially in the first five years of the plan. It needs to allow time for these sites to be built out and this can be greatly assisted by increasing the number of outlets. The HBF is currently working with Government to try and increase the number of outlets in large schemes. The more outlets that are opened up, the better the rate of completions tends to be, as marketing and sales teams are able to reach different segments of the purchasing public.

As we have argued above, delivery can be assisted by increasing the number of development opportunities across the district. This would be helped by allocating small sites in every one of the large villages listed in Table 4.1. While we acknowledge that the Council allows sites in the villages to come forward through the neighbourhood planning process, there is little guarantee that this will happen. Many of the large villages are sustainable locations for growth. Some have small allocations but many do not. Some like Long Hanborough, Ascott-under-Wychwood and Finstock have rail stations. The latter two settlements appear to have no specific allocations in the Plan, at least according to paragraph 5.30a (non-strategic housing allocations).

The inclusion of an additional quantum of housing to meet Oxford’s unmet needs is supported, and responds to one of the concerns of the Inspector when suspending the Examination. However, this must now be treated as part of the district’s OAN, and included in the five year supply, rather than ring-fenced as a separate quantum to be accommodated in a different way. Given that the strategy response for accommodating this additional need is a new Garden Village, which is to be brought forward through an Area Action Plan, has significant infrastructure requirements, and will therefore take many years to procure, the requirement must be factored into the supply side now. This is particularly so given the somewhat unrealistic Housing Trajectory set out in the Plan at Appendix 2, which indicates not only the first contribution to housing delivery from the proposed Garden Village in 2021-22, but both an initial and sustained contribution of 220 dwellings per annum over the ensuing 10 year period. This would appear to be extremely optimistic, and indeed unrealistic, in terms of both the initial delivery trajectory and that it can be sustained at the same level for the remainder of the Plan period.

The distribution of the revised quantum is too focused on the existing main settlements, or otherwise on the proposed, and to date unfunded, new Garden Village. The consequence is reliance on delivery of a substantial quantum of the overall housing requirement from a relatively few large strategic sites / development locations. This in turn gives rise to significant risks of delivery failure arising from slippage in the delivery trajectories from those sites owing to infrastructure and other constraints, including market constraints.
saturation causing developers to moderate the rate of release of plots to the market.

There is evidence of little progress having been made on some large sites that have been identified for a considerable period of time. Not least amongst these is the strategic development area at West Witney. Application for outline planning permission (Ref: 12/0084/P/OP) for 1,000 dwellings was made in January 2012, and yet according to the Council’s web site remains undetermined. Even if planning permission is granted in early 2017, the delivery trajectory set out in Appendix 2 to the Plan looks optimistic given the number of land interests involved, requirements for reserved matters applications, and the substantial infrastructure that will need to be put in place before the first houses can be available for occupation.

In addition to the above, there are difficulties with the proposed strategic development area at East Witney, and from which the Council is relying on increased delivery (450 dwellings in total) through the Proposed Modifications. As was acknowledged by the Inspector in Part 2 of his Preliminary Findings (IN 016), there are considerable delivery risks associated with the development of this allocation owing to conflicting aims between the main parties, and the landowner not owning all the land required to deliver the requisite highway infrastructure (IN 016, paras. 2.3-2.6). Although the Council has responded by amending the delivery trajectory to postpone first completions until 2021-22, there is no certainty that the difficulties can be resolved.

With regard to Witney, given the delays in bringing forward the strategic development area to the west of the town, together with the substantial strategic development areas identified in the current Plan, the uplift in housing delivery required to yield its capacity in the period to 2031 is substantial for a town of its size. It is questionable whether the local market can sustain substantial sales volumes from three strategic development areas simultaneously, as well as a number of smaller sites, to deliver its required contribution during the plan period.

Through the proposed modifications the overall requirement for the Chipping Norton Sub-Area is increased by approximately 33%. This compares with a proportionate increase of approximately double that for the other sub-areas combined comprising the south of the plan area. That is a disproportionate increase that reflects the strategy to focus on a small number of large strategic sites in each of the sub areas.

The strategy for the Chipping Norton Sub-Area seems to be driven by the environmental sensitives affecting the principal settlement itself, and in particular its "... prominent hill-top position on the eastern edge of the Cotswolds Area of Outstanding Natural Beauty (AONB) within which most of the town is situated" (para. 9.4.1). However, those constraints do not affect the other principal settlements in the sub-area of Enstone and Middle Barton, which are outside the AONB and, particularly in the case of Middle Barton, a considerable distance away from it. In setting a capacity for the sub-area as a whole, insufficient regard appears to have been had to the potential of smaller settlements to accommodate growth.

To reduce the risks of delivery failure a more balanced distribution is required that increases the requirement for the Chipping Norton Sub-Area and provides a wider development focus, including smaller development opportunities at the rural settlements that can make an early contribution to improving the five year housing land supply. To achieve this more balanced strategy, a Rural Service Centre should be designated in the northern part of the Plan area, in which respect Middle Barton is the most appropriate settlement.

M752 Bloombridge Bloombridge Mr Cutler 1901 > SECTION 5 - PROVIDING NEW HOMES > Housing Delivery Objection is made to MM25 (Paragraph 5.25) which should be changed to reflect the overall housing requirement of 16,510 (OAN of 688dpa plus 2,750 unmet need) to ensure the plan is consistent with
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| MM753         | David Wilson Homes Southern | David Wilson | -                | c/o Barton Willmore | 1902       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 25 | We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document.
The proposed site allocations fall somewhat short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have already been permitted to deliver homes, however limited evidence is presented on the deliverability of these sites.

The published housing supply position paper sets out the Council's assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period.

The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) acknowledging that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required. Uncertainty is particularly pronounced for older planning permissions for which schemes have been prepared at a time removed from the present housing market.

While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall. |
| MM759         | Lincoln College          | Lincoln College | -                | Lincoln College   | 1947       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 25 | We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document.
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| MM756         | Cantay Estates           | Cantay Estates | -                | Cantay Estates   | 1950       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 25 | MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have already been permitted to deliver homes, however limited evidence is presented on the deliverability of these sites.

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<td>MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have already been permitted to deliver on homes, however limited evidence is presented on the deliverability of these sites. The published housing supply position paper sets out the Council's assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions. The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) acknowledging that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required. While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.</td>
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<td>We agree with the proposed amended wording to paragraph 5.25 which aims to clarify the Council's commitment to significantly boosting the supply of housing in accordance with paragraph 47 of the National Planning Policy Framework.</td>
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<td>The Council confirm that there is a significant backlog of 1,836 homes amount to approximately 3 years' worth of housing supply when set against a requirement from 2011 of 660 homes. Part of the reason for this backlog, alleged by the Council at Paragraph 5.25 of the Plan, is a lack of urgency in bringing forward strategic sites. This validates our objections set out above at main 23 and main 24 in respect of the fragility of Sustainable Urban Extensions and that these should not be relied upon in terms of delivering a five year housing land supply or overall numbers in the Plan period. Having recognised a significant backlog at Main Modification 25, the Plan does not identify how it intends to deal with the backlog. This is a failing of the Plan and would lead to repeated debates on a planning application by planning application basis as to the quantum of the backlog at any given point in time; whether a 5% or 20% buffer should be applied to the backlog on the basis of persistent underperformance;</td>
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<td>and whether the backlog should be addressed in the next five years of the Plan or spread across the Plan period. To plan for predictability, Main 25 should identify how the backlog is to be addressed and by when. This could be by allocating additional smaller sites of sufficient scale as to make a meaningful contribution to housing delivery but not so great as to be burdened by a combination of delays to the planning system and infrastructure delivery such that the backlog can be dealt with promptly within the next five years of the Plan period as required by the PPG.</td>
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We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.

Sources of Supply

The supporting text to Policy H2 sets out the various sources through which the housing requirement for West Oxfordshire will be met (excluding unmet need from Oxford City), as summarised in the table on page 6 of the attachment.

Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement for West Oxfordshire of 13,200 over the Plan period.

We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District, as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. There should be no delays to deliverability on any allocated site, in the context of a current 5 year housing land supply shortfall, and therefore reference to their delivery post-2021 should be deleted. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

The revised Policy as currently drafted states: “With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards.”

The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.
Proposed paragraph 5.34c seeks to justify the Council's proposed approach by advising that:

"To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified."

As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted within the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.
The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.

22. MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively-assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document.

23. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have already been permitted to deliver on homes, however limited evidence is presented on the deliverability of these sites.

24. The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.

25. The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.

26. While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.

It should also be noted that permissions here are not really the issue. WODC has performed well in terms of permitting appropriate applications and additionally quite a few inappropriate sites have gained approval on appeal, due to the perceived lack of a five-year housing land supply. However, delivery by developers on the large sites is lagging behind and supply is being controlled by them. Clause 5.25 notes that the market has been flat and that there has been a lack of urgency by developers. This rather supports the argument that demand and need (at least for market housing) are in fact less than the SHMA target. After all, developers only proceed when demand is strong, so that profit can be maximised.

Unless developers deliver, WODC will always struggle to demonstrate a five-year supply and so will remain vulnerable to speculative and harmful applications. The problem will be worse if the target is set above demand level (that is, the higher the target, the more likely this is to happen). We believe that the target is indeed too high. Should delivery lag behind permissions (leaving a gap in the five-year supply), developer permissions, land banks and share values will be augmented. However, this won't help the District and in
particular won’t provide the affordable housing that is undoubtedly needed, since affordable housing relies on market housing delivery. Therefore, the process is fundamentally flawed as developers can delay delivery and then argue for more allocations or permissions, due to a lack of supply directly of their own making.

WODC is claiming a five-year supply, which we support. Permissions have been buoyant and many are of a small or medium size, which are likely to come forward quickly. No doubt developers will argue against the robustness of the five-year supply, but with permissions remaining strong, the lack of delivery is down to the developers themselves and they should not be allowed to use this as justification for more allocations.

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<td>MM36</td>
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<td>Richard Munro</td>
<td>Mr</td>
<td>Munro</td>
<td>76</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 25</td>
<td>A clear acknowledgement of how developers' under-delivery - owing to land-banking and market manipulation, rather than planning policy as they maintain - results in an even higher target imposed for future years.</td>
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<td>MM388</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 25</td>
<td>Policy H2 – Delivery of New Homes (MM25 to MM30) 3.15 With regard to the main body of the Policy and MM30 we agree with the overall housing requirements being set out in this policy too. However, we disagree with: * the application of the Liverpool approach in terms of addressing delivery; * the application of the 5% buffer (instead of 20%); and, * the extent of delivery over the plan period that is expected from the SDAs. 3.16 Overall, the Council cannot deliver a 5 year housing supply which has been addressed in a number of recent appeal decisions in detail, with the latest decision indicating the Council accept they can only demonstrate a 3.21 year supply. Moreover, we do not consider the SDA’s will be capable of delivering the requirement set out for them by the Council within the plan period. Sedgefield vs Liverpool 3.17 The NPPF is clear that the intention is to significantly boost the supply of housing. The NPPF confirms the Sedgefield approach is the preferred method as does the PAS guidance on the matter. The Sedgefield approach has also been endorsed at the following appeals within West Oxfordshire in recent months: * Gladman: Appeal ref: APP/D3125/W/15/3019438, dated 16th May 2016 * Pye Homes: Appeal ref: APP/D3125/W/15/3129767 &amp; APP/D3125/W/15/3139807, dated 4th July 2016 * Gladman: Appeal ref: APP/D3125/W/15/3005737, dated 24th Aug 2016 * Minister Lovell: Appeal ref: APP/D3125/W/16/3143114 &amp; APP/D3125/W/16/3148659, dated 25th Aug 2016 * Gladman: Appeal ref: APP/D3125/W/15/3136376 dated 2nd Nov 2016 * Barwoods: Appeal ref: APP/D3125/W/15/3138076, dated 14th Nov 2016 3.18 It is clearly evident that the Sedgefield approach is the one that should be followed. Should a different approach or path be pursued, it is our position that the Council would have to demonstrate significant impacts in order to deviate from the standard Sedgefield approach. Such significant impacts have not been established to warrant the Council’s approach. 5% vs 20% NPPF Buffer / Past Completions</td>
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3.19 The Local Plan Inspector confirmed the following at paragraph 2.14 of the preliminary findings (examination document IN 016):

'It is appropriate to consider whether there has been persistent under delivery over a long time period, such as 10 years or more, to incorporate the full economic cycle. In my Part 1 Note, I referred to the substantial over-delivery that had taken place between 2006-2011 compared with the requirement of the South East Plan. Delivery in recent years has been well below the requirement in the submitted local plan, but taking a 10 year period as a whole it would not be reasonable to conclude at present that there had been persistent under-delivery. Accordingly, only the normal 5% buffer is currently required. If delivery continues to be below that which is required, future decision makers may take a different view. The Council would be in a more robust position going forward if the plan creates a 5 year supply with a buffer greater than 5%, thus allowing for any unexpected delays on some sites.

3.20 We note the position has not moved on significantly since the last examination. However, bearing in mind the 2016/17 data will be available by the time we return to the Examination process we believe it would be prudent if the Council sought to plan for a 20% buffer now. Indeed, based on the analysis within Table 2 above it remains the case that the Council have not achieved its target for 5 years of the 10 years presented. However, it is more than likely that the 660 housing requirement figure will not be achieved in 2016/17, taking the under-supply position to 6 years on the trot, which is practically 2/3 of the last decade and a 100% of the period since the NPPF was adopted.

3.21 A key focus of the NPPF is to significantly boost housing supply and the 20% buffer was a key component of national policy to seek to try and achieve this. It hard to believe that the intention of the NPPF was not to impose the higher 20% in situations such a West Oxfordshire’s, where it is clearly evident that early completions within the plan period will be necessary. The application of the 20% buffer would assist with this objective.
Five Year Housing Land Supply

2.28 The revised Policy as currently drafted states: "With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

2.29 The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the 'Duty to Cooperate.' This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.30 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that: "To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified."

2.31 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.32 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.33 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times
associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.34 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

2.35 In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

2.36 As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted within the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.

Other Matters

2.37 The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where "it is consistent with the criteria in 3) below". For clarity this wording therefore requires amendment.

The Inclusion of C2 (Residential Institution Uses) within the Council’s Housing Land Supply ID: 3-037-20150320 of the PPG allows C2 units to contribute towards a Council’s housing supply where the approach to such uses is clearly set out in an adopted Local Plan. In this respect we refer to paragraph 9.85 of the 2014 Oxfordshire SHMA that states:

"The growing older population will however likely lead to some increase in requirements for specialist housing solutions. The analysis above suggests a 98% growth in older population with dementia, and an 82% increase in the older population with mobility problems. From a planning point of view, some of these people will require specialist housing such as sheltered or extra care provision. Increasing numbers of older people with health problems will also require jointworking..."
between housing and health (Council and NHS). The SHMA analysis indicates a potential need for between 280-450 additional housing units to be specialist accommodation across the County to meet the needs of the older person population each year moving to 2031. (Paragraph 9.85) (Our emphasis).

The SHMA is quite clear that specialist accommodation for older persons comprises an additional housing need as opposed to part of the baseline OAN. On this basis, C2 specialist residential uses should not be included within the Council’s housing land supply figures, unless the requirement is specifically amended to account for C2 uses. The Council’s position in this respect is therefore not justified and inconsistent with national guidance.

3.24 With regard to the reference to land to the west of Witney (1,000 dwellings) and land east of Carterton (700 dwellings), which are two significant scale commitments on which the Council is relying to support its housing strategy, it is pertinent to note that both sites have yet to achieve planning permission, more than five years into the Plan period.

3.25 The Statement of Common Ground (SoCG) between Oxfordshire Land Ltd (the development consortium) and the Council, which was signed in October 2015, notes that a resolution to grant planning permission for development of the site was agreed in March 2013. At the time of writing the permission has yet to be issued, pending resolution of issues relating to transport infrastructure. It is notable that the SoCG advised that on site infrastructure works would commence early in 2016, with residential completions likely in the third quarter of 2016 and delivery of up to 700 dwellings by March 2020. Given that there is still no planning permission it is unlikely that the time frames suggested can be achieved. A more realistic set of assumptions would suggest that first residential completions may be achieved by the end of 2017, with a delivery rate of c.150 units a year thereafter suggesting that the site may complete around 2025, assuming that all outstanding matters can be resolved satisfactorily.

3.26 In the case of East Carterton it is understood that the Council expects to complete the S106 agreement early in 2017, more than two years after the resolution to grant permission for development.

3.27 While it is not the case that the sites should not be relied upon to help achieve the OAHN target, it is clear that the housing strategy should be sufficiently flexible and with an even distribution of development such that delays in the delivery of sites within key locations/settlements can be compensated for via the delivery of development on other sites that also accord with the overall development strategy.

3.28 It is apparent that the Council has recently lost a number of residential appeals on sites that are unallocated due to its failure to guarantee a five year housing land supply. To ensure that the overall development strategy is facilitated a sufficient number of deliverable sites should be allocated at the Main Service Centres, in accordance with the Three Towns focus, to mitigate against potential slippage in housing delivery in accordance with the overarching strategy of the Local Plan. Such an approach would be in accordance with the paragraph 1414 requirement for Local Plans to meet objectively assessed needs with sufficient flexibility to adapt to rapid change.
2.22 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED).

2.23 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period.

2.24 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

2.25 The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

2.26 The revised Policy as currently drafted states:

"With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

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2.28 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

"To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have
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Other Matters
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| MM746         | Hallam Land Management  | Hallam Land Management | - | Hallam Land Management | 1812 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 26 | C2 Uses (MM 26)
Main Modification 26 seeks to count C2 permissions towards general housing needs claiming this to be in keeping with the Planning Practice Guidance. This was a matter considered in a recent example in Stratford-upon-Avon, as part of the Core Strategy Examination. The Inspector referred to the NPPG which requires that “The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra-care, registered care) should be assessed... The assessment should set out the level of need for residential institutions (Use Class C2)” but was that the Council had not done this in that instance (paragraph 380 refers). The same applies here. In consequence because need is not assessed in relation to C2 uses, such uses should not be included within the housing land supply calculations in West Oxfordshire as well. This assertion should be removed from MM26. |
| MM749         | Home Builders Federation Ltd | Home Builders Federation Ltd Mr J Stevens | Mr | Stevens | 1822 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 26 | MAIN 26
Paragraphs 5.26 – 5.27
MAIN 27
Paragraphs 5.28 - 5.30c
The Council has made some large strategic scale allocations and strategic sites. These will be responsible for delivering the majority of the requirement. All of these sites are concentrated around the three largest settlements, with the exception of Eynsham and the West Oxfordshire Garden Village. These strategic allocations are necessary but there may be problems associated in the short-term with market over-saturation at these particular locations. This could slow-down the rate of delivery. It will be important to increase the number of outlets on each of the strategic allocations to assist with build-out rates.

Delivery would be better assisted in the short to medium term by increasing the number of medium-sized scale schemes - i.e. the non-strategic allocations of about 20-100 dwellings. The Council could also greatly assist struggling small developers by making specific allocations in the villages for small schemes of 10 dwellings and fewer. This would provide certainty for small developers. As the Plan is drafted at the moment we feel that small developers will be discouraged from making applications in the villages given the prohibitive wording of Policies H2 and OS2. It would be hard for an applicant to know whether his/her application would be considered to be in conformity with the plan. There are too many clauses in these policies that could be interpreted by the Council’s development management team as counting against the scheme. |
| MM746         | Hallam Land Management  | Hallam Land Management | - | Hallam Land Management | 1840 | > SECTION 5 - PROVIDING NEW HOMES > | The Plan does not include a table that clearly sets out the residual requirement for which sites must be allocated in the Plan, including appropriate non-implementation allowances against both the existing commitments and proposed allocations. Indeed, it appears that the Plan presumes that both existing commitments and proposed allocations will be implemented in their entirety, and no contingency for slippage is included. This is considered to be an untenable position, and likely to result in the OAN not being |
A minimum slippage allowance of 10% should made against existing commitments. Given that existing commitments as of September 2016 stood at 4,751 dwellings, this gives rise to a requirement to allocate sites for an additional 475 dwellings.

A non-implementation allowance should also be made against the proposed allocations. Given the reliance placed on a small number of large strategic sites, from which a substantial uplift on past delivery rates is required, and which, as is clear from the delivery trajectory in Appendix 2, is heavily back-loaded towards the end of the plan period reflecting the long lead times to deliver housing from large new development areas, the risks of slippage are real and the consequences significant. It is therefore arguable that a nonimplementation allowance of greater than 10% should be applied in the circumstances of this case.

It is evident from the plan that a number of sites on which reliance is placed are of uncertain deliverability. In addition to the uncertainties surrounding the proposed Garden Village, there is evidence of constraints associated with the strategic development areas at Witney in particular. Moreover, there is evidence of constraints relating to a number of other, non-strategic sites that are allocated in the Plan (for example, Woodford Way Car Park and REEMA Central).

Applying the minimum slippage allowance of 10% to the proposed site allocations (strategic and nonstrategic sites) gives rise to a requirement to allocate land for an additional 817 homes.

The correctness of this approach is endorsed by the recent report (November 2016) of the Inspector concerning the Examination of Consequential Amendments to the Other Remitted North Somerset Core Strategy Policies. There are parallels with the current case in that, at the mid-point in the Core Strategy period, North Somerset Council is facing a substantial uplift in the housing requirement following quashing of the original housing requirement set out in Policy CS13, and its replacement with a revised requirement that reflects a substantial uplift (by approximately 50%) on the original. In considering the distribution of the revised requirement, the Inspector noted that two large strategic sites comprising new urban villages accounted for a substantial part of the District’s housing requirement, and held as follows: ...

projects of this size inevitably encounter practical obstacles to implementation. Significant progress has been made towards infrastructure provision ... but there is a lot more to do. Thirdly, build rates can vary according to the prevailing economic climate. Just a modest slippage in delivery against the indicated trajectory would diminish the contribution of this source towards the total requirement. (para. 18).

There is also uncertainty over planning permission lapse rates. The Council has applied a lapse rate of 9% to small site permissions which reflects the average lapse rate for the three years up to 2011, a figure derived from research for the 2011 Strategic Housing Land Availability Assessment. It has not applied a lapse rate to the larger sites because it says the average lapse rate between 2006 and 2011 was 0.73% of the dwelling stock. But some objectors argue that the lapse rate is higher – based on their calculations, around 2% on large sites and 24% based on historic rates. In reality, neither approach is especially reliable because the data from both calculations is derived from a short period which included both economic growth and recession and may not be indicative of future lapse rates, which could increase or decrease in response to economic prospects. The information supplied by the parties reinforces rather than dispels the uncertainty around this matter. There is a possibility that higher lapse rates than allowed for by the Council could occur in the next few years with a negative effect on housing supply if adequate flexibility is not built into the policies. (para. 19).
The conclusion to be drawn from the foregoing is that, whilst there is no reason to anticipate the failure of the strategy, there is potential for slippage and under-delivery. The Council has been optimistic in its approach to the residual requirement that needs to be provided for through the Site Allocations Plan...

(para. 22)

There are parallels in the current case. As in North Somerset, the current plan relies heavily on a limited number of large strategic sites, with the ‘inevitability’ that they will encounter obstacles to implementation as noted by the Inspector. As in North Somerset, a ‘modest slippage’ in delivery against the indicated trajectory would have a significant impact on the contribution of the strategic sites towards the total requirement, with particularly serious consequences in this instance given the ‘back-loading’ of the delivery trajectory from strategic sites.

The inclusion of a non-implementation allowance is therefore reasonable and indeed necessary. It should arguably be higher than 10% insofar as it applies to the strategic sites.

However, incorporating a 10% allowance for both extant planning permissions and allocated sites, the adjusted supply is as set out below (see attachment page 20).

Even on the Council’s own figures, and assuming that all existing commitments and emerging allocations yield their capacity in full during the plan period, the Proposed Modifications do not make sufficient provision to meet the OAN, which is a ‘minimum’ requirement. The adjusted supply, which makes reasonable allowances for non-implementation, and which would seem conservative having regard to the circumstances of the current case, indicates that provision needs to be made through the Plan for an additional 1,500 dwellings.

We have made presentations to you on behalf of our clients, the Dowley, Conlon, Brooks, Williams and Huntly families over a number of years during the ongoing review of the Local Plan, seeking to have their land at Brize Norton Road/Bushey Ground, Minster Lovell allocated for housing, including your most recent SHLAA call for sites consultation in February this year and put forward their land as being available and suitable for such a use. Previous ref 262.

We note that in the latest version of the Draft Plan a site for 85 dwellings has been proposed on a back land site adjoining the north west edge of the village and that following a planning application this site has been granted consent in the last month. We believe the Council may find the need to allocate more dwellings in sustainable settlements like Minster Lovell and our clients site is both suitable and available. There is an existing access via Bushey Ground which already serves a number of existing dwellings and businesses.

We realise this site is not large enough to be seen as a strategic one, but given the draft plan modifications have now included/identified a number of non-strategic sites ranging from 25 to 300 dwellings, we believe this site should have been included as well – so Modification Main 26 (para5.30b) should be amended to include this site and likewise Main 90 Witney sub Area table 1 and again Main 115. We anticipate the Council may find there will prove to be a need to provide more deliverable sites like this because the larger sites are either not deliverable quickly or worse not at all within the Plan period.

In Main 104 paras 9.2.51 a,b and c - our clients support the principle of extending development westwards from Downs Road and linking Downs Road to B4047. There is a four way link interchange proposed to the A40 at Downs road and possibly another may be provided at the B4477 at Minster Lovell.

Please take this letter as a repeat of our earlier representations – our client’s land is still available for housing
and possibly some element of employment and hope that you will now reconsider it for inclusion in your new allocations in the final draft plan before it goes before the EIP in March/April 2017.

We would be happy to discuss any aspect of this further with you if that would assist you. We attach a plan showing the land verged pink.

We would agree with the proposed amended and additional text to paragraphs 5.26 to 5.27. We would however suggest that for clarity the word “dwellings” is added to the end of the last sentence to paragraph 5.27 as set out below:

“As of 1st September 2016, the number of homes expected to be delivered through existing commitments was 4,751 comprising 4,107 on larger sites of 10 or more dwellings and 644 on smaller sites of less than 10 dwellings.” (added)

These paragraphs refer to existing commitments, Strategic Development Areas and Non-Strategic Housing Allocations. This demonstrates an extremely high reliance on large sites forming a component of the housing supply including: 4,107 dwellings on sites with planning permission or a resolution to grant; 6,450 dwellings on SDAs (principally sites over 1,000 dwellings) which do not currently benefit from planning permission; and several Non-Strategic sites of 200 or dwellings, again without planning permission at present. This equates to 73% of the overall housing requirement on large sites, the majority of which are located within the 3 MRCs, whilst only 304 dwellings are committed/allocated within 5 of the 34 Villages.

Whilst it is acknowledged that the majority of growth should be directed to the most sustainable locations within the District in line with the settlement hierarchy, it should also be recognised as detailed at paragraph 4.17 of the Draft Plan, that not all growth “can or indeed should go to Winney, Carterton and Chipping Norton” as there is a need for development elsewhere in the District in order to spread the benefits of growth to help sustain the more rural parts of the District. This is supported by the guidance at Paragraphs 54-55 of the NPPF and within the PPG in respect of Rural Housing, which highlights the need to recognise the particular issues facing such areas in terms of housing supply and affordability, and the role housing has in supporting the broader sustainability of villages by helping to retain local services and community facilities such as schools, local shops and cultural venues.

The extremely limited housing allocations to a handful of Villages ignores the potential availability of other sites within some of the other larger Villages, which are more sustainable- with reference to the Council’s updated Settlement Sustainability Report (December 2016), no housing allocations have been identified at 3 of the top 5 most sustainable Villages (North Leigh, Brize Norton and Enstone). This appears contrary to the Plan’s Vision and Core Objectives which highlight the challenge facing residents in view of house prices well above the national average and the special emphasis on providing homes for local people in housing need (C06).

RSL are promoting a site at land south of Oxford Road, Enstone (see enclosed Location Plan) is just one example. This is a site adjacent to the settlement boundary, outside the Cotswold AONB and is otherwise deliverable, achievable and viable with no technical constraints that would prevent it from coming forward in the next 5 years.

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| MM773         | Sharba Homes            | Sharba Homes    | Sharba Homes     | Sharba Homes      | 2097       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 26 | We would agree with the proposed amended and additional text to paragraphs 5.26 to 5.27. We would however suggest that for clarity the word “dwellings” is added to the end of the last sentence to paragraph 5.27 as set out below:

“As of 1st September 2016, the number of homes expected to be delivered through existing commitments was 4,751 comprising 4,107 on larger sites of 10 or more dwellings and 644 on smaller sites of less than 10 dwellings.” (added) |
<p>| MM783         | Daniel Hatcher          | Mr Hatcher      | Sharba Homes     | Sharba Homes      | 2138       | &gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 26 | These paragraphs refer to existing commitments, Strategic Development Areas and Non-Strategic Housing Allocations. This demonstrates an extremely high reliance on large sites forming a component of the housing supply including: 4,107 dwellings on sites with planning permission or a resolution to grant; 6,450 dwellings on SDAs (principally sites over 1,000 dwellings) which do not currently benefit from planning permission; and several Non-Strategic sites of 200 or dwellings, again without planning permission at present. This equates to 73% of the overall housing requirement on large sites, the majority of which are located within the 3 MRCs, whilst only 304 dwellings are committed/allocated within 5 of the 34 Villages. Whilst it is acknowledged that the majority of growth should be directed to the most sustainable locations within the District in line with the settlement hierarchy, it should also be recognised as detailed at paragraph 4.17 of the Draft Plan, that not all growth “can or indeed should go to Winney, Carterton and Chipping Norton” as there is a need for development elsewhere in the District in order to spread the benefits of growth to help sustain the more rural parts of the District. This is supported by the guidance at Paragraphs 54-55 of the NPPF and within the PPG in respect of Rural Housing, which highlights the need to recognise the particular issues facing such areas in terms of housing supply and affordability, and the role housing has in supporting the broader sustainability of villages by helping to retain local services and community facilities such as schools, local shops and cultural venues. The extremely limited housing allocations to a handful of Villages ignores the potential availability of other sites within some of the other larger Villages, which are more sustainable- with reference to the Council’s updated Settlement Sustainability Report (December 2016), no housing allocations have been identified at 3 of the top 5 most sustainable Villages (North Leigh, Brize Norton and Enstone). This appears contrary to the Plan’s Vision and Core Objectives which highlight the challenge facing residents in view of house prices well above the national average and the special emphasis on providing homes for local people in housing need (C06). RSL are promoting a site at land south of Oxford Road, Enstone (see enclosed Location Plan) is just one example. This is a site adjacent to the settlement boundary, outside the Cotswold AONB and is otherwise deliverable, achievable and viable with no technical constraints that would prevent it from coming forward in the next 5 years. |
| MM784         | North Witney Land       | North Witney    | North Witney     | North Witney      | 2149       | &gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 26 | We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here. |</p>
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<td>Sources of Supply</td>
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The supporting text to Policy H2 sets out the various sources through which the housing requirement for West Oxfordshire will be met (excluding unmet need from Oxford City), as summarised in the table on page 6 of the attachment.

Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement for West Oxfordshire of 13,200 over the Plan period.

We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District, as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

The NPPF makes clear that Local Plans "should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change." As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. There should be no delays to deliverability on any allocated site, in the context of a current 5 year housing land supply shortfall, and therefore reference to their delivery post-2021 should be deleted. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

The revised Policy as currently drafted states: "With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City's needs will be incorporated into housing delivery assumptions from 2021 onwards."

The NPPG is clear in its guidance to LPA's (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the 'Duty to Cooperate.' This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

Proposed paragraph 5.34c seeks to justify the Council's proposed approach by advising that:

"To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified."
As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted within the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.

Other Matters

The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where "it is consistent with the criteria in 3) below". For clarify this wording therefore requires amendment.
3.15 With regard to the main body of the Policy and MM30 we agree with the overall housing requirements being set out in this policy too. However, we disagree with:

- the application of the Liverpool approach in terms of addressing delivery;
- the application of the 5% buffer (instead of 20%); and,
- the extent of delivery over the plan period that is expected from the SDAs.

3.16 Overall, the Council cannot deliver a 5 year housing supply which has been addressed in a number of recent appeal decisions in detail, with the latest decision indicating the Council accept they can only demonstrate a 3.21 year supply. Moreover, we do not consider the SDA's will be capable of delivering the requirement set out for them by the Council within the plan period.

Sedgefield vs Liverpool

3.17 The NPPF is clear that the intention is to significantly boost the supply of housing. The NPPF confirms the Sedgefield approach is the preferred method as does the PAS guidance on the matter. The Sedgefield approach has also been endorsed at the following appeals within West Oxfordshire in recent months:

- Gladman: Appeal ref: APP/D3125/W/15/3019438, dated 16th May 2016
- Barwoods: Appeal ref: APP/D3125/W/15/3138076, dated 14th Nov 2016

3.18 It is clearly evident that the Sedgefield approach is the one that should be followed. Should a different approach or path be pursued, it is our position that the Council would have to demonstrate significant impacts in order to deviate from the standard Sedgefield approach. Such significant impacts have not been established to warrant the Council's approach.

5% vs 20% NPPF Buffer / Past Completions

3.19 The Local Plan Inspector confirmed the following at paragraph 2.14 of the preliminary findings (examination document IN 016):

'It is appropriate to consider whether there has been persistent under delivery over a long time period, such as 10 years or more, to incorporate the full economic cycle. In my Part 1 Note, I referred to the substantial over-delivery that had taken place between 2006-2011 compared with the requirement of the South East Plan. Delivery in recent years has been well below the requirement in the submitted local plan, but taking a 10 year period as a whole it would not be reasonable to conclude at present that there had been persistent under-delivery. Accordingly, only the normal 5% buffer is currently required. If delivery continues to be below that which is required, future decision makers may take a different view. The Council would be in a more robust position going forward if the plan creates a 5 year supply with a buffer greater than 5%, thus allowing for any unexpected delays on some sites.

3.20 We note the position has not moved on significantly since the last examination. However, bearing in
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<td>mind the 2016/17 data will be available by the time we return to the Examination process we believe it would be prudent if the Council sought to plan for a 20% buffer now. Indeed, based on the analysis within Table 2 above it remains the case that the Council have not achieved its target for 5 years of the 10 years presented. However, it is more than likely that the 660 housing requirement figure will not be achieved in 2016/17, taking the under-supply position to 6 years on the trot, which is practically 2/3 of the last decade and a 100% of the period since the NPPF was adopted. 3.2.1 A key focus of the NPPF is to significantly boost housing supply and the 20% buffer was a key component of national policy to seek to try and achieve this. It hard to believe that the intention of the NPPF was not to impose the higher 20% in situations such as West Oxfordshire’s, where it is clearly evident that early completions within the plan period will be necessary. The application of the 20% buffer would assist with this objective.</td>
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<td>2.23 We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.. Sources of Supply</td>
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2.30 Proposed paragraph 5.34c seeks to justify the Council's proposed approach by advising that:

"To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified."

2.31 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

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2.33 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.34 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

2.35 In light of the above, in order to ensure its soundness the Plan should make provision to
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>Thames Water are the statutory water and sewerage undertaker for the West Oxfordshire District Council and are hence a “specific consultation body” in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012. We have reviewed the Schedule of Main Modifications documents and note in relation to specific sites the following comment is included: “connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.” We have concerns that this comment is a “standalone” comment, with no context as to who or what? As such we consider the comment throughout the Local Plan should be amended so that it is clearer and therefore more robust. We propose the following wording: “Developers must demonstrate capacity exists ahead of connection to the waste water network. Where upgrades are required it must be determined ahead of development coming forward, how these upgrades will be delivered.”</td>
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<td>Mr</td>
<td>Rose</td>
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<td>When the Local Plan was originally developed, it made sense to concentrate housing developments in the three market towns. However, it is not appropriate to merely extrapolate the original allocations to take the additional numbers required by the Inspector and the SHMA. In particular, it is not sustainable to allocate an additional 800 homes to the Chipping Norton SDA. The percentage of residents employed locally has been falling steadily over the last decade and is now below 30%. Employment growth in the County is centred on the ‘knowledge spine’ running from Bicester through Oxford to the South. Chipping Norton is too inaccessible to attract significant potential employers, who will want to locate near the clusters along the spine. The main employment locally is for ‘minimum wage’ jobs in retail and caring sectors. New residents looking for professional or technical jobs will be forced to commute by car using the sub-standard A44 towards Oxford or the more dangerous A361 towards Banbury. The bus service to Oxford only runs hourly and has to cope with the severe congestion in the Wolvercote roundabout area. Access to the North Cotswold railway line at...</td>
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<td>MM518</td>
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<td>Mrs Powell</td>
<td>Powell</td>
<td>1264</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>Kingham is also difficult - the connecting bus service is now sparse and unreliable following the County Council cuts, not as implied in para. 7.58. The additional 800 homes must be allocated nearer to Oxford with easy access to a railway line, thereby linking easily to the main employment areas in the County. The modified Plan already picks up on this logic, by proposing the Eynsham garden village with good links to Hanborough station (and with the potential to be eventually linked to a re-opened railway line to Witney) and with employment areas nearer to the ‘knowledge spine’ clusters. The Chipping Norton “800” should therefore be reallocated to the Eynsham area or sites even nearer to Oxford, with a start date earlier than the 2021 proposed for the garden village. The Chipping Norton Eastern Link Road proposed as part of the Tank Farm SDA will not achieve the reduction in HGVs through the town centre - the vast majority of HGVs are on the A44 towards Evesham, not on the A361. The link road will be a “road from nowhere to nowhere”. The money on the link would be wasted and reduce the likelihood of achieving a proper Chipping Norton by-pass on the A44. The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>The dramatic increase in housing proposed for Tank Farm is excessive and completely out of proportion with the layout of the town especially with the large number of houses that are already being built. The original number of 600 that was proposed was already too large, but to increase this to 1400 is ridiculous as there is no local demand for this number of housing and a large number of homes will be far too excessive for local people and, so called ‘affordable housing’ is a misnomer as many locals cannot afford these. It also drives up the prices of the existing housing stock. There has been little provision or thought for employment. Some companies, within Chipping Norton who want to expand and cannot get office space and especially not affordable space to build. This plan has no provision for for this so will drive these companies out of town causing more people to travel - mainly by car as many bus routes have been cut. Many new people moving to this development will be from out of town so will be working in larger surrounding towns - travelling to other towns like Banbury, Witney, Stratford, Oxford or Cheltenham causing increased car usage and traffic problems. Chipping Norton already has a problem with traffic and pollution - this will only make it worse and could actually take trade away from what is a thriving town centre. The ‘sweetener’ of a link road would not be effective as most traffic is on the A44 and is not heading to or from Burford - meaning that they would still have to go through the centre of town. I believe that Burford is also considering a weight limit.</td>
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<td>3.29 The proposed modifications to paragraph 5.28 are not considered to be consistent with the evidence base, or indeed with the process that the paragraph implies has been undertaken in respect of each site. 3.30 In the case of the strategic allocations (SDA) at Witney and Chipping Norton it is reasonable to state that they have been subject to detailed scrutiny initially, in respect of their scale and the approach taken to assessing them via the SA process against standard criteria. However, it is considered that the approach to identifying reasonable alternatives via the SA Addendum process, to identify suitable sites to accommodate the proposed uplift in housing numbers, has not been approached robustly.</td>
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3.31 In similar fashion it is not accepted that the new strategic scale development option (SDA) to the west of Eynsham for 1,000 homes has been subject to proper detailed scrutiny having regard to the overarching SA process, which advocates following a development distribution that focuses on the three Main Service Centres of Witney, Carterton and Chipping Norton, with limited dispersal to the rest of the District. The chosen spatial option (Option 2) does not contemplate the assignment of strategic scale growth (via the assessment of spatial options) to the Rural Service Centres. It is contended that this approach, which includes a significant component of development in this location to meet the OAHN of the District, is inconsistent with the chosen spatial strategy and is not supported by the evidence base. It is therefore unsound.

3.32 The SA Addendum demonstrates why the approach to allocating development to the west of Eynsham is unsound having regard to the evidence base. Paragraph 4.44 explains the position:

The submission Plan included a proposed target of 1,600 homes for the Eynsham – Woodstock sub area to be met through a combination of homes already built, existing commitments and other smaller sites, mostly at Woodstock, Eynsham and Long Hanborough. Strategic options for growth at Eynsham were not considered at the submission stage since the agreed strategic approach for the Plan is to focus significant development growth in the Witney, Carterton and Chipping Norton sub areas. (GL Hearn emphasis).

3.33 The paragraph is very clear in stating that the strategic approach to development is to focus significant growth (of a strategic scale) at the three main towns. There is no suggestion here that the approach has changed in light of the uplift in housing numbers now countenanced, a fact the SA Addendum confirms at paragraphs 4.11 and 4.14, in re-affirming the Three Towns focus (Option 2). The only justification for considering more growth within the Eynsham-Woodstock sub area is in response to the undertaking to respond to some of Oxford’s unmet need for housing. Paragraph 4.44 of the SA Addendum confirms this.

3.34 Paragraph 4.45 goes on to make reference to ‘studies’ identifying scope for two new strategic options for growth at Eynsham. There is no footnote or reference within the SA, or indeed within the published evidence base available at the time of writing, explaining what form these ‘studies’ take, but it is assumed the reference is to the LUC study15, which does not appear to form part of the published Local Plan evidence base (at the time of writing) (Appendix 3). As set out elsewhere in this suite of representations the terms of reference were to consider options for accommodating Oxford’s unmet need for housing; there was no remit to consider whether any of the identified options would help to meet the housing requirements of the Districts within which the candidate sites are located. It is therefore misleading to state that there was consideration given to the suitability of Eynsham as a location for meeting the housing needs of West Oxfordshire. The premise for testing the suitability of Eynsham as a location for strategic development to meet the needs of West Oxfordshire is misplaced. What should have been abundantly clear to the authors of the SA Addendum is that development on this scale, in this location is not consistent with the spatial strategy advocated by the SA of the Local Plan. Consequently the approach is fundamentally unsound having regard to the evidence.

3.35 Conversely, the garden village option to meet a proportion of the unmet housing needs of Oxford would be in accordance with the strategy options that the SA Addendum tests and it is a location that was identified and tested by the LUC report for this purpose. Consequently, the inclusion of the garden village is considered to be consistent with the SA of strategic options.

3.36 The proposed modifications include the identification of non-strategic site allocations within four of the five identified sub-areas. These were not tested via the SA process initially because the submission version of
the Local Plan did not include non-strategic allocations. The prospect of non-strategic development that cumulatively would have comprised development on the scale now anticipated at the Rural Service Centre sub-areas (Eynsham-Woodstock and Burford-Charlbury) was only really considered by the SA under the Spatial Distribution (Option 3) – Dispersal, which was rejected.

3.37 As a consequence the only focussed testing of these options is via the SA Addendum, the findings of which are summarised at paragraphs 4.51 and 4.52. Paragraph 4.51 acknowledges that there would ‘potentially’ be negative effects on landscape and on the historic environment, but that these would be mitigated through policies ‘such as’ EH1-7. The SA also states that two options for the Eynsham-Woodstock sub area are close to Blenheim Palace, but potential negative effects (unspecified) would be mitigated through site-specific policy requirements. These statements bear further close consideration.

3.38 The three (not two) options identified for non-strategic development at Woodstock are each in close proximity to the boundary of the WHS, one site actually falls within almost entirely within the view cone extending to the east of the Park, which the Blenheim Heritage Management Plan identifies as significant to the visual setting of the WHS. To contend, as the SA does, that potential negative effects on the historic environment would be mitigated by policy provisions such as those contained within policies EH1-7 is a vague and extremely laissez-faire when considering the importance of the designated heritage assets that are likely to be affected by the proposed modifications.

3.39 Policy EH7 is the only policy of those listed that addresses the Historic Environment; and separate representations are made in respect of Main 83. However, the mitigation that the SA refers to in justifying the allocation of sites at Woodstock contained with Policy EH7 is generic in nature, requiring development proposals affecting designated heritage assets to assess impacts and provide appropriate mitigation strategies to address identified impacts. In addition ‘considerable weight and importance will be given to conserving the intrinsic universal values for which Blenheim Palace and Park is inscribed as a WHS’. These provisions are not any guarantee of the removal or avoidance of harm, as they are in effect development management tools to be applied ‘after the event’ – the event being determination of whether it is appropriate or not, based on appraisal and assessment of the significance of the heritage asset and the effect that development would have on that asset (considered against reasonable alternatives) – to allocate land for development in the first place. Relying on development management tools as justification for allocating a site is fundamentally misplaced and runs entirely contrary to the evidence-based approach to plan-making that the NPPF advocates.

3.40 The SA also concludes that development within the AONB within the Burford-Charlbury sub areas is justified, which would appear to run counter to the guidance set out at paragraph 116 of the NPPF, which advises that planning permission for major development within AONB designations should be refused, except in exceptional circumstances where it can be demonstrated that development is in the public interest. The SA Addendum does not proffer a public interest justification, or demonstrate to any satisfactory degree that exceptional circumstances to justify allocation of land within the AONB are manifest.

3.41 Paragraph 4.5216 states that the reason the non-strategic allocations have been progressed to allocation is because:

‘..they offer the most sustainable likely delivery of development with the least impacts on the important environmental assets of the District.’

3.42 This is a remarkable statement taking into consideration the fact that seven of the 15 options (almost
50% fall within or adjoining landscape and heritage designations (AONB/WHS) that are afforded the highest status of protection, relatively, under the NPPF. With regard to the three proposed allocations at Woodstock in each case the assessment provided as part of the SA Addendum17 concludes that with regard to criterion 14 ‘Conserve and Enhance Landscape Character and the Historic Environment’ the impact would be minor negative/neutral uncertain – with the minor negative being the perceived effect on landscape.

3.43 In each case the assessment of effects is deemed to be mitigated through development management criteria aimed at protecting the historic environment set out at Policy EH7 (addressed above) and via the same criterion applied to each site allocation policy (EW1 c/d/e) which requires that development should be consistent with:

‘Ensuring that development does not have a harmful impact on the setting of the Blenheim Palace WHS’

3.44 Incredibly, taking into account the significance of the heritage asset, this is the ‘mitigation’ on which the SA relies for reaching the conclusion that the proposed allocation is acceptable. There is no assessment of the impact on heritage assets; therefore there can be no certainty or expectation that there will be no impact. Simply concluding that there will be no adverse impact on heritage assets, because the policy allocating the land requires there to be none is a farcical and entirely misguided approach to assessing the merits of a proposed allocation, which requires consideration against all reasonable alternatives. It is an appropriate tool to use in a development management situation, where any decision is limited to whether to approve or refuse a specific development proposal. However, in a plan-making context the question is whether or not to allocate a site for a specified quantum of development; in these circumstances it is necessary to establish the principle of development against a clear and transparent evidence base. As a tool in this scenario it is inappropriate. There has been no such consideration and therefore there can be no prospect of the Council’s approach to identifying these sites for allocation being found sound. The approach to selecting these sites is unjustified and fundamentally flawed and has no evidence of any weight to substantiate it.

The Stanton Harcourt Estate supports the Council’s position that smaller ‘non-strategic’ allocations can help to ensure a deliverable housing supply in the short-term. Accordingly 15 ‘non-strategic’ sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings. Of these 1,700 units, a delivery of circa 685 dwellings is anticipated in the immediate 5 year supply period (2016-2021, Main Modification 201 - Appendix 2: Housing Trajectory). The Estate support the allocation for 50 dwellings on land at the Former Airfield, Stanton Harcourt.

Requirement for a Specific Policy on Housing Density

Given the increased housing targets, CPRE also considers that it is more urgent than ever that development density should be reviewed. The housing mix proposed by the SHMA and noted in 5.63 (only 32.7% 1 & 2 bed, which is very similar to past figures- see clause 2.17) is not consistent with the occupancy assumed in deriving the target. If affordability is the real issue we are trying to address in the District, then we need small, high density units. Any land allocations made must deliver the maximum number of units and those units must be as affordable as possible. This can only be achieved via high density development. The mix of housing proposed does not maximise the land available, nor deliver the lowest cost housing that is clearly needed.

CPRE therefore proposes an urgent review of allocations to ensure that they are maximised. Specifically, it should be investigated whether the same number of houses could be built on less land, leaving space for houses for the next Plan Period instead of having to make additional allocations. The most appropriate way to take this forward would be to develop a clear policy for densities. This issue is now becoming a
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<td>MM714</td>
<td>G Pearman</td>
<td>Mr Pearman</td>
<td>1613</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>The proposed level of housing at Tank Farm been increased from 600 – 1,400 dwellings, partly through allocation of land in the ownership of my Client, to the east of the proposed development area. This expansion is supported and it is confirmed that the land is available, deliverable and developable. My Client is working with other the other main landowners and promoters to bring forward the development.</td>
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<td>MM727</td>
<td>Archstone Land</td>
<td>Jonathan Porter</td>
<td>Mr Porter</td>
<td>1651</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>The draft Plan cannot be considered positively prepared or effective, if it does not demonstrate an adequate supply of housing early in the plan period. Archstone Projects Ltd are currently promoting land west of the Burford Road, Chipping Norton as a site suitable for about 250 homes and to also deliver new recreation facilities linked to the existing hub at Greystones. Chipping Norton Town Council have been consulted on the proposals and confirmed their support to West Oxfordshire District Council. The site has been assessed in the SHELAA (ref.422) as being potentially suitable in part for about 100 dwellings. The initial landscape statement and concept masterplan for the site suggest that the developable area for housing (up to 9ha) could enable a higher number of dwellings. Further work is being undertaken to refine the developable area and landscape mitigation. The site represents a deliverable opportunity to boost housing supply, provide new community infrastructure for Chipping Norton and contribute towards measures to improve air quality in the short term.</td>
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<td>MM724</td>
<td>Gallagher Estates</td>
<td>Gallagher Estates Limited</td>
<td>-</td>
<td>1661</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>Main 25 - 30 – Policy H2 - Delivery of New Homes and Supporting Text 2.21 We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.. Sources of Supply 2.22 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED) 2.23 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period. 2.24 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in</td>
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preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

2.25 The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is falling not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

2.26 The revised Policy as currently drafted states:

"With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

2.27 The NPPG is clear in its guidance to LPAs (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.28 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

"To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified."

2.29 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to
pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.30 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.31 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.32 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

2.33 In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

2.34 As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted in the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.

Other Matters

2.35 The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where "it is consistent with the criteria in 3) below". For clarity this wording therefore requires amendment.

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<td>MM737</td>
<td></td>
<td>Will Benbow</td>
<td>Mr</td>
<td>Benbow</td>
<td>1726 &gt; SECTION 5 - PROVIDING NEW HOMES &gt;</td>
<td>Carterton is the second largest town in the District (after Witney) and has the District's largest employer (RAF Brize Norton), but the local plan modifications do not include a new strategic housing allocation at Carterton. There is a need for a strategic housing allocation at Carterton on the basis that Carterton is a more...</td>
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The presence of RAF Brize Norton to the south of the town and the presence of committed residential development at East Carterton (700 dwellings) means that the town could only grow either to the north or the west. Land to the west has relatively poor links to the A40 and has relatively poor access to public transport. Land to the north is better related to the A40 and has good access to public transport. Land to the north of the Carterton (north of Monahan Way) represents a better location for a new strategic housing allocation.

Main Modification 27 and 136 reflect the increase in dwellings, from 600 – 1,400 dwellings, allocated to the east of Chipping Norton at Tank Farm. CALA supports this level of increase.

I am not qualified to judge the response for legality or compliance but my concern is that there appears to be no effort to limit the new building in villages. The example I can give here being Stonesfield where although 50 homes are mentioned along Woodstock Road the developers proposal for just over half the site shown is 68 Homes and there are other sites in the village which are coming forward such that instead of the 20% increase in population expected by the developments in the document there could be 2-3 times that number. These will be on the fringes of the village and traffic through will be impacted as will the already severe shortage of parking around the shop and particularly near the school at the start and end of day. The water, drainage and other utility links to the village will similarly have to be upgraded with disruption to all.

As Chair of Governors of the school I can also draw attention to the impact of the school of increased numbers, a document is attached which details main issues which are access to the school site and the small size of the hall and kitchen which was designed for a much smaller school (around 100 pupils). The School lies within the conservation area at the heart of the village.

We do not believe that the Garden Village proposal at Eynsham is an appropriate measure for delivering the unmet need for Oxford. It is based on an ambitious timescale for delivery and given that the Government’s announcement for the results of Garden Village proposals has not yet been announced (MAIN 17 references an application for funding), it is unclear how and whether the council will be able to deliver the scheme if the site is not selected of the Locally-led Garden Villages. The anticipated delivery numbers in the bid document are also unrealistic. It would be more appropriate to deal with the objectively assessed need and allocate development to settlements that can deliver homes across the plan period in a more effective manner. MAIN 3, 9, 15 16, 17, 23, 24 and 27 should be reconsidered and amended accordingly.
The Council has made some large strategic scale allocations and strategic sites. These will be responsible for delivering the majority of the requirement. All of these sites are concentrated around the three largest settlements, with the exception of Eynsham and the West Oxfordshire Garden Village. These strategic allocations are necessary but there may be problems associated in the short-term with market over-saturation at these particular locations. This could slow-down the rate of delivery. It will be important to increase the number of outlets on each of the strategic allocations to assist with build-out rates.

Delivery would be better assisted in the short to medium term by increasing the number of medium-sized scale schemes – i.e. the non-strategic allocations of about 20-100 dwellings. The Council could also greatly assist struggling small developers by making specific allocations in the villages for small schemes of 10 dwellings and fewer. This would provide certainty for small developers. As the Plan is drafted at the moment we feel that small developers will be discouraged from making applications in the villages given the prohibitive wording of Policies H2 and OS2. It would be hard for an applicant to know whether his/her application would be considered to be in conformity with the plan. There are too many clauses in these policies that could be interpreted by the Council’s development management team as counting against the scheme.

The Plan does not include a table that clearly sets out the residual requirement for which sites must be allocated in the Plan, including appropriate non-implementation allowances against both the existing commitments and proposed allocations. Indeed, it appears that the Plan presumes that both existing commitments and proposed allocations will be implemented in their entirety, and no contingency for slippage is included. This is considered to be an untenable position, and likely to result in the OAN not being met during the Plan period.

A minimum slippage allowance of 10% should made against existing commitments. Given that existing commitments as of September 2016 stood at 4,751 dwellings, this gives rise to a requirement to allocate sites for an additional 475 dwellings.

A non-implementation allowance should also be made against the proposed allocations. Given the reliance placed on a small number of large strategic sites, from which a substantial uplift on past delivery rates is required, and which, as is clear from the delivery trajectory in Appendix 2, is heavily back-loaded towards the end of the plan period reflecting the long lead times to deliver housing from large new development areas, the risks of slippage are real and the consequences significant. It is therefore arguable that a non-implementation allowance of greater than 10% should be applied in the circumstances of this case.

It is evident from the plan that a number of sites on which reliance is placed are of uncertain deliverability. In addition to the uncertainties surrounding the proposed Garden Village, there is evidence of constraints associated with the strategic development areas at Witney in particular. Moreover, there is evidence of constraints relating to a number of other, non-strategic sites that are allocated in the Plan (for example, Woodford Way Car Park and REEMA Central).

Applying the minimum slippage allowance of 10% to the proposed site allocations (strategic and nonstrategic sites) gives rise to a requirement to allocate land for an additional 817 homes.

The correctness of this approach is endorsed by the recent report (November 2016) of the Inspector concerning the Examination of Consequential Amendments to the Other Remitted North Somerset Core
Strategy Policies. There are parallels with the current case in that, at the mid-point in the Core Strategy period, North Somerset Council is facing a substantial uplift in the housing requirement following quashing of the original housing requirement set out in Policy CS13, and its replacement with a revised requirement that reflects a substantial uplift (by approximately 50%) on the original. In considering the distribution of the revised requirement, the Inspector noted that two large strategic sites comprising new urban villages accounted for a substantial part of the District’s housing requirement, and held as follows: …

... projects of this size inevitably encounter practical obstacles to implementation. Significant progress has been made towards infrastructure provision … but there is a lot more to do. Thirdly, build rates can vary according to the prevailing economic climate. Just a modest slippage in delivery against the indicated trajectory would diminish the contribution of this source towards the total requirement. (para. 18).

There is also uncertainty over planning permission lapse rates. The Council has applied a lapse rate of 9% to small site permissions which reflects the average lapse rate for the three years up to 2011, a figure derived from research for the 2011 Strategic Housing Land Availability Assessment. It has not applied a lapse rate to the larger sites because it says the average lapse rate between 2006 and 2011 was 0.73% of the dwelling stock. But some objectors argue that the lapse rate is higher – based on their calculations, around 2% on large sites and 24% based on historic rates. In reality, neither approach is especially reliable because the data from both calculations is derived from a short period which included both economic growth and recession and may not be indicative of future lapse rates, which could increase or decrease in response to economic prospects. The information supplied by the parties reinforces rather than dispels the uncertainty around this matter. There is a possibility that higher lapse rates than allowed for by the Council could occur in the next few years with a negative effect on housing supply if adequate flexibility is not built into the policies. (para. 19).

The conclusion to be drawn from the foregoing is that, whilst there is no reason to anticipate the failure of the strategy, there is potential for slippage and under-delivery. The Council has been optimistic in its approach to the residual requirement that needs to be provided for through the Site Allocations Plan. … (para. 22)

There are parallels in the current case. As in North Somerset, the current plan relies heavily on a limited number of large strategic sites, with the ‘inevitability’ that they will encounter obstacles to implementation as noted by the Inspector. As in North Somerset, a ‘modest slippage’ in delivery against the indicated trajectory would have a significant impact on the contribution of the strategic sites towards the total requirement, with particularly serious consequences in this instance given the ‘back-loading’ of the delivery trajectory from strategic sites.

The inclusion of a non-implementation allowance is therefore reasonable and indeed necessary. It should arguably be higher than 10% insofar as it applies to the strategic sites.

However, incorporating a 10% allowance for both extant planning permissions and allocated sites, the adjusted supply is as set out below (see attachment page 20).

Even on the Council’s own figures, and assuming that all existing commitments and emerging allocations yield their capacity in full during the plan period, the Proposed Modifications do not make sufficient provision to meet the OAN, which is a ‘minimum’ requirement. The adjusted supply, which makes reasonable allowances for non-implementation, and which would seem conservative having regard to the circumstances of the current case, indicates that provision needs to be made through the Plan for an additional 1,500 dwellings.
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| MM751         | Goldfield Estates       | Goldfield Estates | -                | -                 | 1855       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 27 | MAIN 4 Para 2.9 states: “Importantly, this Local Plan seeks not only to meet the identified housing needs of West Oxfordshire District but also to make additional provision to accommodate a proportion of ‘unmet’ housing need that Oxford City are unable to provide for within their own administrative boundary.”

We fully support this modification, we consider it important that West Oxford cooperates with its neighbouring Boroughs and seeks to accommodate the agreed shortfall from Oxford City Council. For the reasons set out above we support this modification.

We support MAIN 4 and all other modifications that note West Oxford District Council will help meet the wider housing needs and that Eynsham shall play a key part of this, as set out in MAIN 1, 2, 13, 14, 15, 17, 23, 24, 27. |
| MM753         | David Wilson Homes Southern | David Wilson Homes Southern | c/o Barton Willmore | 1903 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 27 | Strategic Development Areas (SDAs) MM27 (Paragraph 5.29) should be modified to reflect the modified housing numbers at Tank Farm (600) and West Oxfordshire Garden Village - within the plan period (1,440) to ensure that the plan is effective and deliverable. |
| MM752         | Bloombridge             | Bloombridge      | Mr               | Cutler            | 1904       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 27 | Strategic Development Areas (SDAs) MM27 (Paragraph 5.29) should be modified to reflect the modified housing numbers at Tank Farm (600) and West Oxfordshire Garden Village - within the plan period (1,440) to ensure that the plan is effective and deliverable. |
| MM756         | Cantay Estates          | Cantay Estates   | -                | Cantay Estates    | 1935       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 27 | Proposed modification - Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.

The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making.

The proposed ‘Garden Village’ is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification.

The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process. |
A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.

Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.

Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.

MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.

MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.

MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.

The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.
The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.

While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.

MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.

We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues
could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.

MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.

The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.

MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPFs encouragement of environmentally sustainable development.

The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use all together. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.
We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

It is unclear as to why those allocated non-strategic sites were selected over other deliverable options identified through the SHELAA. Little explanation is offered while the SA addendum limits assessment to the impacts of those sites allocated; no assessment is included of reasonable alternative non-strategic sites. Failure to consider reasonable alternatives, or offer any other assessment to demonstrate how the allocated sites out-perform alternatives in terms of sustainability undermines the transparency of the plan making process and the soundness of the Plan.

Kingham is a sustainable location for new development to contribute to meeting the district housing need. The village shares the same status as several villages which benefit from housing allocations in the modified Plan; it is also one of the few settlements in the district which has a railway station. Land adjacent to the Royal British Legion Hall (SHELAA ref 336) would be an excellent location for new development. The site can sensitively accommodate new homes consolidating while also opening access from the centre of the village to the RBL. Residents would benefit from access to rail services giving households a genuine sustainable transport option reducing pressure on the local road network.

Our client supports the Council’s position that smaller ‘non-strategic’ allocations can help to ensure a deliverable housing supply in the short-term. Accordingly 15 ‘non-strategic’ sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings. Of these 1,700 units, a delivery of circa 685 dwellings is anticipated in the immediate 5 year supply period (2016-2021, Main Modification 201 - Appendix 2: Housing Trajectory).

In order that the Proposed Modifications enable the Council to meet its ambition of short term site delivery (Paragraph 5.30a), Our Client is of the view that additional ‘non-strategic’ housing allocations should be made at Paragraph 5.30b. This approach will allow for a more flexible approach to housing supply.

In light of the Council’s reported 5 year housing land supply delivery position set out by Main Modification 29 and specifically at Paragraph 5.34b, it is here (and at Main Modification 30) that the Council proposes to utilise the ‘Liverpool’ method in respect of meeting past backlog of housing under supply. The Inspector, in his Preliminary Findings Report – Part 2 (IN016, December 2016), commented:

- On the basis of the plan’s current requirement of 525 dwellings per annum there has already been a shortfall in delivery since 2011;
- National guidance seeks any such shortfall to be made up in the next 5 years;
- If the housing requirement is increased, the shortfall will be greater and may need further action to address;
- The Council needs to have particular regard to National Guidance on this matter, as the ‘Liverpool’ method is not mentioned.

The continued application of the ‘Liverpool’ Method is of concern. The application of this methodology is not considered ‘sound’. The NPPG reports at Para 035 that ‘local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible’. In this respect the Plan is not positively prepared or justified. The concerns previously raised by the Inspector are therefore shared and it is
considered that the Sedgefield approach should be applied in order that a 'sound' Plan is prepared. The Council reports at Paragraph 5.34c that 'insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to deliver a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing'.

To ensure flexibility, increase short term delivery and assist the Council in rectifying its existing housing supply shortfall it is evident that additional site allocations should be made. For this reason, we identify the land interest at Fawler Road, Charlbury as a developable site in accordance with Paragraph 47 of the NPPF.
The Physical Constraints assessment notes that:

‘The land has major groundwater vulnerability which would need to be taken into account in designing development, and that no other physical constraints are apparent.’

The Environment Agency website shows that the site lies in the ‘Minor Aquifer High’ Groundwater Vulnerability zone, along with extensive tracts of West Oxfordshire. The Environment Agency defines a Minor Aquifer as ‘permeable layers capable of supporting water supplies at a local rather than a strategic scale.’ This designation should not be considered as a constraint, which would preclude development of the site.

We fully endorse the view that there are no other physical constraints to development of the site.

Infrastructure Constraints

The Infrastructure Constraints assessment of the site notes that, if further development took place in the village, significant expansion of Stanton Harcourt Primary School would be challenging, and that solutions which provide some facilities off-site could be acceptable.

We note that, in response to the recently submitted planning application (Ref 16/01054/OUT) for 50 new homes on the former Stanton Harcourt Airfield site, a request that a financial contribution of £190,213 is paid by the developer towards the ‘necessary expansion of permanent primary at Stanton Harcourt CE Primary School’ (Oxfordshire County Council’s response to the proposed development, 16th May 2016). Further developments, such as Land East of Main Road, Stanton Harcourt, could also contribute financially to the need for new primary school facilities.

Landscape, Ecology and Heritage

The Landscape, Ecology and Heritage assessment notes that: ‘The site is unspoilt floodplain pasture which is of particularly high quality and sensitive to development (WOLA).’

We contest this description of the site, which was made in a document written nearly 20 years ago. The site is not floodplain (the whole site lies in Flood Zone 1, the area at lowest risk of flooding).

The assessment also notes that there are no Tree Preservation Orders on the site and no specific ecological designations affecting the site - but that the trees on the site boundaries are protected by their location in a Conservation Area, and make a significant contribution to public amenity. Any development of the site would seek to retain and protect the trees around the boundary of the site. No more trees would be removed than is necessary to create a safe access to the site.

SHELAA Conclusion

The SHELAA assessment concludes by noting that the site is available and achievable, but is not suitable for housing or employment, and that; ‘Development of any part of this unspoilt meadow would be harmful to the landscape and character of the area, the character of the Conservation Area and the setting of the adjacent listed building. The loss of any of the trees on the site would cause further harm and are likely to be necessary to secure safe access:’

In addition, the assessment concludes that: ‘The site forms part of the rural gap between Stanton Harcourt and Sutton.’
Once more, we contest the findings of the SHELAA.

Any greenfield site is 'unspoilt', and the use of this pejorative language is not factual nor helpful. We suggest that sympathetic development of the site, which is designed to properly take account of the sensitive setting, could make a positive contribution to the Conservation Area, and to the setting of the adjacent listed building.

Any development would ensure the retention and protection of the mature trees around the site, limiting removal of the trees to that necessary to create a safe access.

We suggest that the functional gap between Sutton and Stanton Harcourt actually lies further to the east, along New Road. This site forms part of the developed area of the site, with Flexneys Paddock to the west, Flexneys House to the south, and Foxburrow Close to the north east. Development of this site would not reduce either the physical or the perceived gap between Sutton and Stanton Harcourt.

Summary and Conclusion

In summary, my client supports the Council’s intention to make provision through the proposed Main Modifications of the Local Plan to meet the District’s Objectively Assessed Housing Need, as well as the District’s allocation of Oxford’s unmet housing need. The overall housing target is clearly challenging, with the timing of delivery of new housing and supporting infrastructure a key consideration.

We are concerned that the Submission Draft Local Plan (including Proposed Main Modifications) places too much reliance on the four SDA’s and a small ‘basket’ of non-strategic allocations. It is clear that in a number of instances there are significant landowner and infrastructure delivery issues to address, which could significantly delay the delivery of new dwellings.

We believe that the Local Plan should allocate additional sites to increase flexibility and provide greater certainty over delivery of the District’s housing requirement.

There is more capacity to deliver sustainable development adjacent to the villages in West Oxfordshire, including on Land to the East of Main Road, Stanton Harcourt.

We disagree with elements of the SHELAA findings in relation to Land East of Main Road, Stanton Harcourt, and believe the land to be available, achievable and suitable for development. We respectively ask that:

- Main Modification 16 to the Local Plan is further amended to remove reference to ‘limited development’ in villages – to enable more development to come forward in the villages.

- The first sentence of the sixth paragraph of Policy OS2 is further amended to read: ‘The villages are suitable for development which respects the village character and local distinctiveness and would help maintain the vitality of these communities, where the proposed development is necessary to meet identified housing needs.’

- The Council adopts the Sedgefield approach to meeting the backlog in housing delivery.
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<tr>
<td>MM765</td>
<td>Mr and Mrs Martin Kinch</td>
<td>Mr</td>
<td>Kinch</td>
<td>1995</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>Strutt &amp; Parker act on behalf of Mr and Mrs Martin Kinch, owners of the land west of Minster Lovell, which the West Oxfordshire Local Plan 2031 allocates for around 85 homes. My clients welcome the identification of this land as a non-strategic housing allocation and wish to reiterate to the Council that, in line with the advice included within the National Planning Policy Framework relating to the deliverability of sites allocated for residential development, the site is ‘available’ now for residential development, offers a ‘suitable’ location for new housing and is ‘achievable’ with a realistic prospect that housing can be delivered within five years. This is supported by the recent submission of an outline planning application for 85 homes on the site which received a resolution to grant planning permission at the November 2016 meeting of the Council’s Lowlands Area Planning Sub-Committee.</td>
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<tr>
<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2005</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>This representation is made in respect of the sustainable settlement of Ascott under Wychwood, which is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text. Land &amp; Partners Ltd (L&amp;P) is a privately owned development company which has identified Ascott under Wychwood as a sustainable location for development. A summary of the company’s approach to development is outlined in Section 2.0. L&amp;P objects to Main Modifications 15, 16, 27, 30 and 172 of the current consultation, as set out below. This modification relates to paragraphs 5.28 – 5.30c of the Plan. Much of the amended text relates to the additional Non-Strategic Housing Allocations, some of which are located in villages. Whilst we agree with the principle of smaller allocations with shorter ‘lead-in’ times to ensure a deliverable housing supply, we have a number of objections to this main modification. Firstly, we object to the inclusion of Land at Myrtle Farm, Long Hanborough, as to our knowledge this is not deliverable. The owners of this site have indicated that they do not intend to bring it forward for development. Furthermore, we question the deliverability of the entirety of the site at Oliver’s Garage, Long Hanborough due to the existing use value of the site. The site allocation for 25 homes includes a number of existing residential properties in separate ownership titles to the main garage. Secondly, our main objection is the lack of a non-strategic allocation at Ascott under Wychwood, within the Burford – Charlbury Sub-Area. The village has a mainline passenger station on the Cotswold and Malvern Line and the Plan acknowledges at para 7.56 that this line has benefited from the redoubling of 20 miles of track and new platforms at Charlbury and Ascott under Wychwood. Furthermore, the village is in reasonable proximity to Oxford City. Main modification 15 is already indicating that the unmet needs of Oxford City present an opportunity to help sustain the more rural areas to by spreading the benefits of growth. Ascott under Wychwood is consequently a village which is well-placed to benefit from housing growth that cannot be met within Oxford City. Having regard to the above, there could be scope for additional sites to be identified at Ascott under Wychwood and this may avoid having to rely on a new Garden Village adjoining Eynsham to accommodate</td>
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The Sustainability Appraisal (SA): The Submission Local Plan only included a proposed housing requirement of 10,500 homes between 2011 and 2031, amounting to 525 new units per year. The plan sought to address only the housing need arising in the district of West Oxfordshire. Although it was acknowledged additional housing was likely to be required to assist in meeting the housing needs of Oxford City no provision was made in the document.

The examination of the Local Plan is presently suspended as the Inspector confirmed the Submission Plan was unsound as it failed to address the objectively assessed housing need; the Council now seeks to address this. Modifications proposed increase housing provision to 13,200 to provide for West Oxfordshire’s need, a further 2,750 homes are also proposed to serve Oxford City. The revised housing provision is some 5,450 units higher than that proposed in the Submission Plan and remains to be delivered over the same plan period. In order to meet the increased figure ‘Strategic Development Areas’ are now proposed. The introduction of these substantial new sites in an area previously proposed for only limited development is a considerable deviation from the spatial strategy of the submission plan proposed. The inclusion of homes to satisfy Oxford’s need is also a significant deviation in spatial strategy from that submitted which solely looked to serve the rural district of West Oxfordshire.

A development strategy involving a new settlement has been subject to SA; the option was ‘scoped out’ of the previous assessment as it was not considered to represent a reasonable option. As the Submission Plan did not include any provision for Oxford no SA was undertaken as to a spatial strategy which looked to serve two housing areas (West Oxfordshire and Oxford City).

The modified Plan amounts to a fundamentally different document to that submitted for examination both in the level of development and the spatial approach. Despite this the changes are dealt with in the SA as an ‘addendum’, rather than fresh consideration being given to the most appropriate options for the distribution of housing.

The modifications proposed are crude additions to a predetermined strategy, rather than choices informed by a full and transparent assessment of all reasonable alternatives. We believe the SA to be deficient; therefore the Plan which follows from it cannot be sound.

Even if it were appropriate to consider the modifications through an SA addendum we believe the addendum itself to be incorrect. The Inspector confirmed in his Interim Findings (INO16) that any new site allocation must be informed by Sustainability Appraisal including assessment against reasonable alternatives. The published SA addendum solely considers two new strategic development sites adjoining Eynsham, rather than seeking to compare any reasonable alternatives.

Those sites closer to Oxford were dismissed out of hand due to Green Belt constraints, while those to the west were dismissed as being too distant from the city. The purpose of the SA is to enable a transparent and balanced assessment of alternative options against sustainability criteria, allowing a judgement to be made. For example a site closer to Oxford would benefit from physical proximity, but present challenges with regard to green belt impacts; a proper SA allows a balanced judgement to be made in a transparent manner offering sound foundations for the plan making process.

The SA does not consider all reasonable alternative options, merely the impacts of the Council’s pre-selected sites. This approach pre-judges the outcomes of the SA, removes the robustness and transparency of the plan making process and results in an unsound Plan.
Evidence base for proposed modifications: The proposed modifications must be informed by a robust and comprehensive evidence base. The modifications to the plan claim to be informed by an updated SHELAA; however this document was not published until 9th December 2016—some four weeks into the six week consultation period on the Local Plan. The sequence of publication suggests the evidence has been tailored to fit the plan, rather than informing the Council's selection of the most sustainable options. It is clearly unacceptable that this consultation has allowed only a fortnight for inspection of the modifications and evidence base. The SHELAA is fundamental to understanding the soundness of the proposed changes, particularly as the document which accompanied the submitted plan was identified as deficient by the Inspector in his interim findings (INO16).

Failure to undertake proper consultation at this stage leaves any decision upon the plan vulnerable to legal challenge as the plan making process, including consultations have not adhered to proper process.

The limited assessment which it has been possible to undertake of the SHELAA suggests it has been treated as a means to limit development in the district, rather than explore the theoretical capacity of suitable development sites.

Numerous sites, including our client's land in Ducklington (ref 342) are incorrectly classed as unsuitable for development as surmountable constraints are treated as fundamental barriers to development. For example site 342 (Ducklington) is considered unsuitable for development owing to landscape impacts; however no consideration appears to be afforded to potential mitigation. Furthermore no consideration is given to benefits which can arise from development; in the case of this site the use of playing fields, presently rented by the community, could be secured.

The restrictive approach applied through the SHELAA means it does not fulfil the purpose of the evidence document. It fails to provide the 'menu of sites' for assessment to ensure the most appropriate are chosen. This issue was identified by the Inspector in his initial findings (INO16) and does not appear to have been satisfactorily addressed; as a consequence the foundations do not exist upon which the Council can build a sound development plan.

### MM770

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<tr>
<td>MM770</td>
<td>RJ Feilden Will Trust</td>
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<td>-</td>
<td>2025</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned however that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt. We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the SHELAA significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment. We consider Ducklington to be a particularly suitable location for additional development. The village shares the same status as several villages within which housing allocations are proposed whilst also benefitting from close access to the major centre of Witney. We consider the proposed development site between the A415 and Standlake Road (SHELAA ref 342) to be a suitable location for new development, it can sensitively accommodate new homes consolidating development to the east of the village. The homes would have excellent access to village facilities and those in Witney and could contribute to securing the playing field for the village which is presently private and rented.</td>
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### MM766

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<tr>
<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2027</td>
<td>&gt; SECTION 5 - PROVIDING</td>
<td>This representation is made in respect of the sustainable settlement of Long Hanborough, which is in the 'village' tier of the Plan's Settlement Hierarchy (Table 4.1, p35) where development will be supported where</td>
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It respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text.

Land & Partners Ltd (L&P) is a privately owned development company which has identified Long Hanborough as a sustainable location for development. A summary of the company’s approach to development is outlined in Section 2.0.

This modification relates to paragraphs 5.28 – 5.30c of the Plan. Much of the amended text relates to the additional Non-Strategic Housing Allocations, some of which are located in villages. Whilst we agree with the principle of smaller allocations with shorter ‘lead-in’ times to ensure a deliverable housing supply, we have a number of objections to this main modification.

Firstly, we object to the inclusion of Land at Myrtle Farm, Long Hanborough, as to our knowledge this is not deliverable. The owners of this site have indicated that they do not intend to bring it forward for development. Furthermore, we question the deliverability of the entirety of the site at Oliver’s Garage, Long Hanborough due to the existing use value of the site. The site allocation for 25 homes includes a number of existing residential properties in separate ownership titles to the main garage.

Secondly, our main objection is to the insufficient non-strategic allocations at Long Hanborough, within the Eynsham – Woodstock Sub-Area. The village has a mainline passenger station nearby (Hanborough) on the Cotswold and Malvern Line. Paragraph 9.5.16 of the Plan acknowledges that this is one of the District’s largest and most well-used stations. Car parking facilities have recently been expanded to improve capacity and there are aspirations for further station improvements including additional parking, a footbridge and new platform so that any trains extended from Oxford can terminate and turnaround.

Furthermore, the village is in reasonable proximity to Oxford City. Main modification 15 is already indicating that the unmet needs of Oxford City present an opportunity to help sustain the more rural areas by spreading the benefits of growth. Long Hanborough is consequently a village which is well-placed to benefit from housing growth that cannot be met within Oxford City.

Stormport object to the non-allocation of its land at Over Norton for housing development. It also, supports the acknowledgement in paragraph 5.31 that no allowance for housing development has been made for sites coming forward through the Neighbourhood Plan process, given the uncertainty associated with such matters. This further underlines the need for the Plan’s housing target to be expressed as a minimum to allow for potential increases in housing as a result of sites coming forward.

The purpose of this Section of the Representation Statement is to make the case for the allocation of the above site, as shown on the plans attached to this document. The site is currently the subject of an outline planning application (ref: 16/03761/out) for the following:

"Outline Planning application for the erection of up to 18 dwelling and associated public open space, all matters bar access reserved."

The purpose of the following paragraphs is to demonstrate its compatibility with the policies in the emerging
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<td>Local Plan and why its allocation would be justified and a means of addressing the soundness issue in terms of housing land supply in the Chipping Norton sub-area.</td>
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<td>The site is available immediately and there are no legal barriers to its development.</td>
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<td>The application site is 2.18 ha in size and is situated on the north west edge of Over Norton that is identified as a village within the settlement hierarchy. It is located approximately 1km north of Chipping Norton, which is classed as a main service centre. It is located on the edge of the Cotswold AONB and benefits from good access to the A44 linking the area to other parts of the District. The population of Over Norton parish is 498 people (ONS census Data, 2011).</td>
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<td>Proposed Use</td>
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<td>Residential Development - up to 18 units, which could be easily delivered in 5 years, subject to planning permission and submission of subsequent reserve matters application. The Site can provide a mix of open market and affordable housing in accordance with relevant development plan policies. The site has been previously assessed by the SHLAA with the reference number 319. The SHLAA assessment is based on the development of the wider field, which this site forms part of. At just over 4ha, the wider parcel is considered too large by Stormport to be developed. As a result, a reduced level of development has been proposed, forming a new settlement boundary.</td>
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<td>Designations</td>
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<td>The site is located within the AONB, but not subject to any other site specific designations. The site is not in the flood plain (flood zone 1) and is not immediately adjacent to it or a watercourse.</td>
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<td>Analysis</td>
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<td>In terms of the development of the site, it is necessary to demonstrate how it accords with the provisions of the emerging Local Plan. The starting point is Policy OS2, states that: “The villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities.”</td>
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<td>It goes on to note that allocations have been made and that further allocations may come forward in Neighbourhood Plans. The policy then provides a direct link to Policy H2 in that proposals for residential development have to be considered in accordance with that Policy. Over Norton is identified as a village on Table 4.1, which is supported by the 2016 Settlement Study. The earlier iteration of which was found sound by the Inspector in his interim findings. The significance of OS2 is that it clearly expects all villages to play a role in accommodating new development to assist the District in meeting its housing needs, such an approach is also consistent with the Framework in respect of rural development at paragraph 55. If this were not the intention of the Policy, then Over Norton would not be considered as a village and the Policy would not have been worded in such a positive manner.</td>
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The policy also contains a series of general principles, against which proposals should be assessed, the relative performance of the site against those principles are set out below:

**Proportionate in scale?**
Yes, the proposed allocation is for 18 units, this is less than 10% of the total number of households in the parish. It will not result in a disproportionate amount of development.

**Logical complement?**
Yes, the proposed development is on the northern edge of the village, bounded on two sides by residential development. The development line for the site is drawn in such a way that development arcs around the site, lining up with housing to the south west of the site. As a result, the site will consistently have a residential backdrop and complement the existing pattern of development.

**Avoids Coalescence?**
Yes, the development of this site will not erode in any material way the gap between Over Norton and surrounding settlements.

**Compatible with adjoining uses?**
Yes, the adjacent uses are residential and a village hall, which are entirely compatible with further residential development, as proposed.

**Protect or enhance local landscape?**
Yes, in formulating the proposals, considerable thoughts has been given to potential impacts on the AONB and the ability of development to provide a better management of views of the village. Currently, housing sits somewhat abruptly with the countryside, with open views into back gardens with minimal screening. Development, with associated landscaping can provide a better transition between the village and the wider countryside. In terms of long distance views, these are minimal and any short-range views always have the backdrop of housing development.

**Loss of landscape feature?**
No, the proposals involve the partial development of an arable field. The development will create new public open space, which will be a feature in its own right.

**Safe vehicle access?**
Yes, the development will make use of an existing field gate and access point into the site. There are also pedestrian routes into the village and the ability to use public transport to access Chipping Norton, which is a short distance away.

**Flood Risk?**
The site is in flood zone 1.
Policy H2

Turning to Policy H2, the Policy’s approach to housing in villages is a positive one which will allow for new development in specific circumstances, which includes:

"On undeveloped land within or adjoining the built-up area where the proposed development is necessary to meet identified housing needs and is consistent with the Criteria in 3 below and other policies in this plan in particular Policy OS2."

The proposed development adjoins the built-up area of Over Norton and the housing proposed is to assist the Plan in delivering its housing target and can make use of the windfall projection for the Chipping Norton sub-area. Table 9.3 of the Plan (MAIN 136) shows that there is a windfall allowance which would be of sufficient size to allow this site to come forward and address Stormport’s reservations about table 9.3 being unsound.

In addition, and as can be seen from the Oliver Garage Allocation in Long Hanborough, the Plan has allocated housing sites in the mid-20s, so the allocation of an 18-unit site would be consistent with the approach adopted elsewhere in the Plan. Finally the point has to be made that development will help the vitality of the village. This is important in that it provides an opportunity for more people to live in the village, increasing the diversity of age and incomes. The risk is that without further development, village vitality will degrade because villagers would have to move out of the village if no new housing was available. As a result, development would be entirely consistent with Policy H2.

As a result of the above analysis, the allocation of land at Choice Hill Road would be entirely consistent with the Local Plan development strategy. Detailed technical objections can be easily addressed. Therefore, it is recommended that the site, as per the attached plan is allocated for development.

This representation is made in respect of the sustainable settlement of Tackley, which is in the 'village' tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text.

Land & Partners Ltd (L&P) is a privately owned development company which has identified Tackley as a sustainable location for development. A summary of the company’s approach to development is outlined in Section 5.28 – 5.30c of the Plan. Much of the amended text relates to the additional Non-Strategic Housing Allocations, some of which are located in villages. Whilst we agree with the principle of smaller allocations with shorter ‘lead-in’ times to ensure a deliverable housing supply, we have a number of objections to this main modification.

Firstly, we object to the inclusion of Land at Myrtle Farm, Long Hanborough, as to our knowledge this is not deliverable. The owners of this site have indicated that they do not intend to bring it forward for development. Furthermore, we question the deliverability of the entirety of the site at Oliver’s Garage, Long Hanborough due to the existing use value of the site. The site allocation for 25 homes includes a number of existing residential properties in separate ownership titles to the main garage.
Secondly, our main objection is the exclusion of land at Tackley from a non-strategic allocation. The village lies outside the AONB and has a station on the Cherwell Valley Line which connects Oxford and Birmingham. The Plan acknowledges at para 7.57 that the largest stations used by most passengers and served by the greatest number of train services include Tackley. Furthermore, it is in reasonable proximity to Oxford City. Main modification 15 is already indicating that the unmet needs of Oxford City present an opportunity to help sustain the more rural areas to by spreading the benefits of growth. Tackley is consequently a village well-placed to benefit from housing growth unmet within Oxford City, within the Eynsham - Woodstock Sub-Area.

Main Modification 27: Non Strategic Housing Allocations

Spitfire Homes supports the Council's position that smaller 'non-strategic' allocations can help to ensure a deliverable housing supply in the short-term, providing a shorter 'lead-in' time to development in comparison to strategic site delivery. Accordingly 15 'non-strategic' sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings. Of these 1,700 units, a delivery of circa 685 dwellings is anticipated in the immediate 5 year supply period (2016-2021, Main Modification 201 - Appendix 2: Housing Trajectory).

In order that the Proposed Modifications enable the Council to meet its ambition of short term site delivery (Paragraph 5.30a), Spitfire Homes is of the view that additional 'non-strategic' housing allocations should be made at Paragraph 5.30b. This approach will allow for a more flexible approach to housing supply delivery, required by the NPPF.

This is pertinent, in light of the Council's reported 5 year housing land supply delivery position set out by Main Modification 29 and specifically at Paragraph 5.34b. It is here (and at Main Modification 30) that the Council proposes to utilise the 'Liverpool' method in respect of meeting past backlog of housing under supply. The Inspector, in his Preliminary Findings Report – Part 2 (NG16,December 2016), commented:

- On the basis of the plan's current requirement of 525 dwellings per annum there has already been a shortfall in delivery since 2011;
- National guidance seeks any such shortfall to be made up in the next 5 years;
- If the housing requirement is increased, the shortfall will be greater and may need further action to address;
- The Council needs to have particular regard to National Guidance on this matter, as the 'Liverpool' method is not mentioned.

The continued application of the 'Liverpool' Method is of concern to Spitfire Homes. The application of this methodology is not considered 'sound'. The NPPG reports at Para 035 that 'local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible'. In this respect the Plan is not positively prepared or justified. Spitfire Homes share the concerns previously raised by the Inspector and it is considered that the Sedgefield approach should be applied in order that a 'sound' Plan is prepared. The Council reports at Paragraph 5.34c that 'insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to deliver a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing'.

To ensure flexibility, increase short term delivery and assist the Council in rectifying its existing housing supply shortfall it is evident that additional site allocations should be made. For this reason, Spitfire Homes identifies its land interest at Standlake as a deliverable and developable site in accordance with Paragraph 47 of the NPPF.
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<td>Mr</td>
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Evidence Base: Strategic Housing and Economic Land Availability Assessment

Spitfire notes the very recent publication of the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA). Spitfire Homes’ interest is identified by site reference 158 (Malthouse Farm). An area of 6.44 hectares is reported. The SHELAA concludes that the site is available and achievable though not suitable for residential development. Spitfire Homes responds to specific extracts of the Council’s SHELAA through the following table (see original representations).

This representation is made in respect of Land between Witney Road and High Street, Finstock.

This site is Ref: 267 in the Strategic Housing Land Availability Assessment (SHLAA). The site lies outside the AONB. The owners of the site are willing to make the site available for housing development, as recorded in the SHLAA. We disagree with the assessment of suitability in the SHLAA for the reasons set out in Section 4.7.

Finstock is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. Our promoted site at Finstock would accord with the above criteria and we propose that the site is allocated to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text.

Land & Partners Ltd (L&P) is a privately owned development company which has identified this site as a sustainable location for development. L&P has reputation for engaging with the local community and securing high quality design, tailored to the local context. Negotiations are progressing with the landowners and the intention is to engage with residents and the Parish in early 2017.

Objection to Main Modification 27

This modification relates to paragraphs 5.28 – 5.30c of the Plan. Much of the amended text relates to the additional Non-Strategic Housing Allocations, some of which are located in villages. Whilst we agree with the principle of smaller allocations with shorter ‘lead-in’ times to ensure a deliverable housing supply, we have a number of objections to this main modification.

Firstly, we object to the inclusion of Land at Myrtle Farm, Long Hanborough, as to our knowledge this is not deliverable. The owners of this site have indicated that they do not intend to bring it forward for development. Furthermore, we question the deliverability of the entirety of the site at Oliver’s Garage, Long Hanborough due to the existing use value of the site. The site allocation for 25 homes includes a number of existing residential properties in separate ownership titles to the main garage.

Secondly, our main objection is the exclusion of land at Finstock from a non-strategic allocation. Finstock is a highly sustainable location for development, having a range of services, facilities and other attributes which make it a more suitable village for growth than others in the same category. The village has a station on the Cotswolds and Malvern Line and is only partly within the AONB. This is in addition to being in close proximity to Oxford City.

Main modification 15 suggests that the unmet needs of Oxford City present an opportunity to help sustain the more rural areas to by spreading the benefits of growth. Finstock is a rural village well-placed to benefit from housing growth unmet within Oxford City, being located in the southeast of the district.
Finstock’s growth has been limited by its location partly within the AONB, but there is a specific area adjoining the village outside of the AONB which has greater potential for development. This would limit the need to develop within the AONB at other locations, in accordance with national policy.

We also note that Main Modification 66 states at paragraph 7.57a that “there is significant demand and yet further passenger growth is being suppressed by train capacity and poor access to some rural stations. There is potential for further growth with the introduction of an hourly service in December 2018. New trains will bring increased capacity with additional seating and will also achieve faster journey times...”. We believe this provides further justification for allocating a site at Finstock, where there is a rail station close by (within accepted walking and cycling distances) and also with buses connecting to the village.

**SECTION 5 - PROVIDING NEW HOMES**

We note and agree in principle to the wording proposed to paragraphs 5.28 to 5.30c in relation to strategic and non-strategic site allocations. Whilst we have no objection in principle to the strategic development surrounding Witney, we would however consider that the development surrounding Witney (both to the north and the east) should be attributed to Witney’s growth and not to Hailey. As such, with this being the case, we are of the opinion that Hailey is still able to accommodate a level of growth proportionate to the village and that this site to the south west of Charlbury Road is the most suitable site for growth.

We consider that this site alone suggests that the Council have not given sufficient consideration to site availability or site selection.

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The plan should allocate land south of Plum Lane, Shipton under Wychwood for a development of 100 residential dwellings.

Site Context

The site extends to approximately 6.6 ha (16.3 acres) and comprises a greenfield site currently in agricultural use (see Appendix 1 - Site Location Plan). The proposed development site is located within the Village of Shipton-under-Wychwood within the District of West Oxfordshire. The proposed development site is located approximately 4 miles (6.4 km) north of Burford, Oxfordshire, 1.3 miles (1.66 km) north-west of Milton-under-Wychwood and 1.56 miles (2.52 km) south of Ascott-under-Wychwood.

The site borders Trots Lane on the south-western boundary and residential properties to the south of Plum Lane. The site borders allotment gardens to the southern boundary of the site. The site has the potential to be accessed by both vehicles and pedestrians from off Plum’s Lane and Swinbrook Road.

The proposed development site is adjacent to residential development on the northern boundary and allotment gardens along the southern boundary. The surrounding character is predominantly residential, with Tall Trees Care Home located within 470 metres of the proposed development site. There is a shop serving Shipton-under-Wychwood approximately 800 metres from the proposed development site, with a further two shops located in Milton-under-Wychwood (approximately 1.5 km). The village contains two residential care homes (Tall Trees Care Homes) located north west of the site and (The Old Prebendal House) located north of the development site. A primary school (Wychwood Primary School) is located between the...
villages approximately 1 km north-west of the site. A Doctor’s Surgery (Wychwood Surgery) is within a kilometre of the site, whilst the Wychwood Library is around 1.7 kilometres away, in Milton-under-Wychwood.

There is a bus stop within 400m of the site which provides a daily service to Witney, another bus stop is located around 850m from the site which is served by frequent services to Charlbury, Bourton on the Water and Burford. Shipton Railway Station is located around 1.3km north of the site and provides services twice daily in each direction to Oxford, London Paddington and to locations within Oxfordshire.

The site falls within the Cotswold Area of Outstanding Natural Beauty and a Conservation Area. The Environment Agency Flood Map for Planning shows that the site is located within Flood Zone 1. This is the zone of the lowest flood risk and is compatible with all forms of development.

**Potential Uses and Capacity**

We proposed that the net developable area of the site would be able to accommodate up to 100 dwellings, including affordable housing (see Appendix 2 – Sketch Layout). This capacity has been calculated as a result of a masterplanning exercise that takes into account the site’s characteristics and constraints. The Sketch Layout shows that a development of 100 dwellings could be achieved, whilst incorporating features such as generous open space provision including a new village green, along with landscaping features and low density development edges.

**Site Suitability Issues**

The emerging Local Plan identified Shipton-under-Wychwood as a service centre that is capable of accommodating a moderate level of development where this is accessible. With this in mind, the site is well located to access a number of key local services/facilities including the primary school, local shops, Doctor’s surgery and public transport connections. The site’s primary access to the site would be obtained from Plum Lane and would coincide with the existing field access in this location. A secondary access point could be taken off Swinbrook Road to the south of the established row of trees and hedgerows. A primary access route could then run through the site, with secondary and shared surface routes leading off this and providing access to the remaining areas.

The site is within flood zone 1, nor is it affected by any ‘bad neighbour’ uses. There is no known potential for any contamination or any other key constraints on the site. The site can be suitably accessed from the Plum Lane, although it is acknowledged that some rationalisation of the junction between Plum Lane, Swinbrook Road and Leafield Road may be required to improve its overall functionality.

Forthcoming proposals for the site will be carefully considered, with a landscape-led masterplan utilised to ensure the landscape and scenic beauty of the AONB is preserved in accordance with relevant national and local policies. The design of the scheme will also be informed by a clear understanding of the surrounding historic context, which includes listed buildings and the Conservation Area. The site’s potential for biodiversity will be informed by ecological surveys undertaken by suitably qualified professionals.

**Site Availability Issues**

The site is currently owned by three separate parties, all of which are in advanced discussions with Spitfire Properties. The landowners are willing to make the site available for development, whilst Spitfire is willing
and engaged in discussions to take a controlling interest in the site with a view to developing it for residential purposes. Therefore, there is a realistic prospect that a planning application will be submitted within the next five years of the Plan period.

**Site Achievability Issues**

There is a realistic prospect the site will come forward for residential use as the site has willing landowners, who are actively engaged in the formal planning process and will be seeking to gain a planning consent within the next five years of the plan period. It is confirmed that the site is “deliverable” in accordance with paragraph 47 of the NPPF, which means the site is:

* Available now (the site has no current use that would delay development);
* Offers a suitable and sustainable location for development; and
* Is achievable with realistic a prospect that housing, including affordable units, will be delivered within five years and that development will be viable (the landowner does not envisage there being any issues regarding viability).

In line with paragraph 49 of the NPPF, and given that the District cannot demonstrate a five year housing land supply, the site is deliverable and can come forward in the short-term for residential development. Allocating the site for development would assist in meeting the identified housing shortfall within West Oxfordshire District and any residual unmet need from Oxford City.

CALA raise objection over a number of the strategic and non-strategic housing allocations identified within modification no. 27.

Concern is raised in relation to the two allocations at Eynsham i.e. land to the west of Eynsham and the new garden village to the north of the A40.

From an assessment of the background documentation supporting the emerging Local Plan, there is no market research which identifies a clear demand for the level of growth within this general location (other than the unmet need of Oxford). As set out within the representation to Policy H2 – Main Modification 30 question marks are raised over the ability to deliver 3200 dwellings within the plan based on lead in times, and the ability to complete and then sell the required number of units per annum over the plan period. Further, one questions the ability to do so on both sites given their proximity to one another and the ability to sell two very different concepts; one which is simply an large strategic urban extension to a village; and the other which is being required to provide exemplary design. And all of this when there are other large sites coming forward much closer to the edge of Oxford – Eynsham still being approximately 8 miles away.

Additionally, given the location of both sites so close to the A40 and the urban edge of Oxford, there are well known highway capacity issues along the A40 in directions heading in and out of Oxford. It is relevant to therefore ask the question as to whether it is appropriate to allocate up to 3,200 dwellings in this location and whether the suggested works being consulted upon by Oxfordshire County Council will help to alleviate the current and future highway infrastructure issues.

Of particular interest is the Transport Technical Note, dated 11th November, page 15, which states:

“The Preferred Local Plan includes a high concentration of additional dwellings along the A40 corridor on the section between the roundabouts at Burford and Headington. These are mainly located in Eynsham and Witney and are forecast to have an impact on the A40 highway section along this corridor. The key model
observation along the A40 on the Burford - Headington corridor (combined for both directions) for both the morning and evening peak hours is that distance travelled by vehicles along the corridor reduces.

This is due to delays along the A40 leading to vehicles re-routing away from the A40 around Eynsham and Witney, resulting in a reduced number of vehicles travelling along the A40. We have identified model delays at the A40 Cassington signalised junction (A40/ Cassington Road/ Eynsham Road) in both the Do Minimum scenario and Preferred Local Plan scenarios (Figure 14 to Figure 17). The overall impact of this is a reduction in average speed, coupled with an increase in delay. Optimisation of signal timings at these junctions does not seem to resolve the level of delay or rerouting experienced which suggests a network pinch point which is likely to require some form of mitigation in the future."

Indeed the preferred Local Plan approach which includes the suggested proposed modifications to the Local Plan in relation to Witney and Eynsham identifies a substantial potential impact on the A40.

In light of the market concerns and the clear transport evidence which states there would need to be significant highway mitigation to accommodate the levels of growth, not just at land to the west of Eynsham and the new garden village but for additional allocations at Witney for example, the proposed numbers of dwellings at the strategic allocations should be reduced in the trajectory or the actual allocations be dispersed across other rural service centres such as Bampton.

Such an approach for a greater dispersal across the District is supported by the House Builders Federation within their response to West Oxfordshire District Council which states:

"The Council has made some large strategic scale allocations and strategic sites. These will be responsible for delivering the majority of the requirement. All of these sites are concentrated around the three largest settlements, with the exception of Eynsham and the West Oxfordshire Garden Village. These strategic allocations are necessary but there may be problems associated in the short-term with market over-saturation at these particular locations. This could slow-down the rate of delivery. It will be important to increase the number of outlets on each of the strategic allocations to assist with build-out rates.

Delivery would be better assisted in the short to medium term by increasing the number of medium-sized scale schemes – i.e. the non-strategic allocations of about 50-100 dwellings."

With regards to the non-strategic sites identified within the proposed modifications, concerns are raised by as to whether there are enough non-strategic allocations to ensure a rolling 5 year housing land supply early in the plan period. As highlighted above there are a number of strategic allocations which are unlikely to deliver units until later in the plan period given the significant infrastructure provision that is required and associated with such allocations. Indeed, the Plan does not allocate sufficient dwellings to meet the OAN. Instead it relies on the review of the Plan to satisfy this objective. Doing so is contrary to the NPPF which says that Plans should allocate sites for the periods 0-5, 6-10 and “where possible” 11-15 years. Where this is not possible one would anticipate there being a good reason not to. No such justification has been given, particularly where suitable, available and achievable sites actually sites. The example that this representation provides is land to the north of New Road, and between Station Road and Mount Owen Road, Bampton.

Objection is also raised with regards to a number of the non-strategic allocations and whether they are the most suitable for allocation given landscape, heritage or environmental designations and site specific constraints that affect a number of the sites.
Firstly, the former Stanton Harcourt Airfield has been identified as delivering units early in the plan period. However, given the previous use of the site where contamination is expected, the site will have to be remediated prior to the delivery of any dwellings on site. This is likely to result in a delay of delivery of the 50 units until the latter part of the plan period.

Secondly, Land East of Woodstock (300 units) and Land north of Banbury Road, Woodstock (120 units) have all been raised as having the potential to impact upon the setting of Blenheim Palace, a World Heritage Site. Indeed the land north of Banbury Road, Woodstock site, which is earmarked for the delivery of 120 units, is within the heart of an important view into the Park from Woodstock towards the column of victory.

PPG (2a-0032) states "World Heritage Sites are designated heritage assets of the highest significance. Appropriate policies for the protection and sustainable use of World Heritage Sites, including enhancement where appropriate, should be included in relevant plans. These policies should take account of international and national requirements as well as specific local circumstances.

When developing Local Plan policies to protect and enhance World Heritage Sites and their Outstanding Universal Value, local planning authorities, should aim to satisfy the following principles:

- protecting the World Heritage Site and its setting, including any buffer zone, from inappropriate development
- striking a balance between the needs of conservation, biodiversity, access, the interests of the local community, the public benefits of a development and the sustainable economic use of the World Heritage Site in its setting, including any buffer zone
- protecting a World Heritage Site from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect
- enhancing the World Heritage Site and its setting where appropriate and possible through positive management
- protecting the World Heritage Site from climate change but ensuring that mitigation and adaptation is not at the expense of integrity or authenticity

Planning authorities need to take these principles and the resultant policies into account when making decisions."

Therefore it is paramount that the LPA seek to protect the setting of the World Heritage Site and protect it from cumulative changes which could have a significant effect upon Blenheim Palace. The delivery of 120 units within an important view of the World Heritage Site and the delivery of 300 units adjacent to an important view of Blenheim Place would not be enhancing the setting of the heritage asset in this instance and therefore their allocation as a non-strategic allocation is questioned.

Additionally, the non-strategic allocation of land to the east of Burford for 85 units is also questioned. The site is located within the Cotswold AONB and therefore a development of 85 units would constitute major development within the AONB. In line with paragraph 116 of the NPPF which states:
"Planning permission should be refused for major development in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- 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."

It is clear that paragraph 116 of the NPPF seeks to guide major development to areas outside of the AONB. It can be demonstrated that there are alternative sites within the district which could accommodate a development of up to 85 units.

Suitability, Achievability and Availability of land at Station Road and Mount Owen Road, Bampton

With regards to the concerns over the sites mentioned above, a number of further development options are suggested on land to the north of the existing 160 units at Bampton without causing any significant adverse impacts on matters such as landscape, drainage, highways or ecology.

CALA are currently working on two development options for the site, one for up to 75 units and one for up to 245 units. As expressed previously, both development options would not result in any significant adverse impacts.

Vehicular and pedestrian access to the site will be gained off a widened Mount Owen Road and/or through the land to the south which is the subject of a detailed consent (ref 15/03505/RES). Each development option of up to 75 units or 245 units has been developed with the three dimensions of sustainable development in mind.

Development at this site would meet the social dimension by providing a range of market and affordable housing to meet the needs of West Oxfordshire as well as the more localised needs of Bampton and the surrounding area. The site is within close proximity to a range of facilities and services including a primary school, doctor’s surgery, pubs, local shop and a post office. There is also good accessibility to Witney through an hourly bus service.

The developer is committed to delivering a high quality development that integrates well with the surrounding community and will deliver additional benefits for use by existing and future residents. Such benefits include the opportunity to provide land for any future expansion at Bampton Church of England Primary School which is known to be close to capacity. It is highlighted that CALA’s site is the only site in Bampton which would be able to provide land for future expansion at Bampton Church of England Primary School. Within the 2016 SHELAA Appendix 3 document prepared by West Oxfordshire District Council, land at Blackhouse Farm (SHELAA reference 331) states:

"Bampton CE Primary School is expanding to an admission number of 30, however this is expected to be needed for already-permitted housing. Site constraints are likely to rule out further expansion of the school,"
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|              |                        |                 |                  |            |                  | However, this site is adjacent to the school site. If additional school site area could be incorporated, it could unlock the potential of Bampton School to expand, addressing the needs of Bampton and possibly also other nearby villages such as Aston & Cote.

This statement is factually wrong as the only site that lies adjacent to the school is the site under control by CALA, land between Station Road and Mount Owen Road. Land at Blackhouse Farm lies 600m to the south east of Bampton Church of England Primary School.

The economic dimension would be met by providing a range of dwellings in a sustainable location which would contribute to economic growth. New residents would also help towards the economic dimension, with a proportion of their income being spent on local services and facilities. Additional employment would arise from the construction and sales phases of the development.

Finally, the environmental dimension can be met through the development of land that as identified above is not constrained by any landscape or ecological designations unlike other non-strategic allocations in other rural service centres such as Burford and Charlbury. The site lies within Flood Risk Zone 1, the lowest category of flood risk, according to the Environment Agency Flood Risk Maps for Planning. The site is also located outside any designated landscape or Article 1(5) land.

Development at this site would lead to a loss of a greenfield site, however, this is offset by the developer’s commitment to providing a high quality scheme that will deliver substantial social and economic benefits which seeks to integrate with the existing built environment and local community. The proposed site is also well related to the neighbouring New Road site. Residential use on this site is deemed to be the most suitable use for the site given its close proximity to a range of facilities and services such as the primary school, local shop and post office.

Summary

In relation to Proposed Main Modification 27, concern is raised over a number of the strategic sites such as land west of Eynsham and the new garden village to the north of the A40 and on this basis the modification cannot be deemed sound. There is no market research which identifies a clear demand for the level of growth within this general location. Further, one questions the ability for both sites to come forward given their proximity to one another and the ability to sell two very different concepts; one which is simply an large strategic urban extension to a village; and the other which is being required to provide exemplary design. Additionally, there is known highway constraints along the A40 at present and one would question whether the highway network could accommodate the level of growth suggested without significant highway infrastructure improvements.

Additionally, concern is raised over a number of non-strategic allocated sites such as land East of Woodstock and Land north of Hill Rise due to the potential harm to the setting of Blenheim Palace; land at the Former Stanton Harcourt Airfield over the likelihood of contamination and the associated delays through remediation work; and land to the east of Burford which would represent a form of major development within the Cotswolds’ AONB.

In light of the above, numbers associated with the larger strategic sites at Eynsham and the Garden Village should be reduced and a number of the non-strategic allocations should be removed given there associated site specific constraints.
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<tr>
<td>MM783</td>
<td>Daniel Hatcher</td>
<td>Mr Hatcher</td>
<td>2139</td>
<td></td>
<td>Overall, CALA are of the view that the Proposed Modifications to the emerging Local Plan cannot be declared sound in their current format.</td>
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<td>These paragraphs refer to existing commitments, Strategic Development Areas and Non-Strategic Housing Allocations. This demonstrates an extremely high reliance on large sites forming a component of the housing supply including: 4,107 dwellings on sites with planning permission or a resolution to grant; 6,450 dwellings on SDAs (principally sites over 1,000 dwellings) which do not currently benefit from planning permission; and several Non-Strategic sites of 200 or dwellings, again without planning permission at present. This equates to 73% of the overall housing requirement on large sites, the majority of which are located within the 3 MRCs, whilst only 304 dwellings are committed/allocated within 5 of the 34 Villages.</td>
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<td></td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>-</td>
<td>2150</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>Whilst it is acknowledged that the majority of growth should be directed to the most sustainable locations within the District in line with the settlement hierarchy, it should also be recognised as detailed at paragraph 4.17 of the Draft Plan, that not all growth &quot;can or indeed should go to Witney, Carterton and Chipping Norton&quot; as there is a need for development elsewhere in the District in order to spread the benefits of growth to help sustain the more rural parts of the District. This is supported by the guidance at Paragraphs 54-55 of the NPPF and within the PPG in respect of Rural Housing, which highlights the need to recognise the particular issues facing such areas in terms of housing supply and affordability, and the role housing has in supporting the broader sustainability of villages by helping to retain local services and community facilities such as schools, local shops and cultural venues. The extremely limited housing allocations to a handful of Villages ignores the potential availability of other sites within some of the other larger Villages, which are more sustainable - with reference to the Council’s updated Settlement Sustainability Report (December 2016), no housing allocations have been identified at 3 of the top 5 most sustainable Villages (North Leigh, Brize Norton and Enstone). This appears contrary to the Plan’s Vision and Core Objectives which highlight the challenge facing residents in view of house prices well above the national average and the special emphasis on providing homes for local people in housing need (C06). RSL are promoting a site at land south of Oxford Road, Enstone (see enclosed Location Plan) is just one example. This is a site adjacent to the settlement boundary, outside the Cotswold AONB and is otherwise deliverable, achievable and viable with no technical constraints that would prevent it from coming forward in the next 5 years.</td>
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<tr>
<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>-</td>
<td>2150</td>
<td>We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.</td>
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<td>The supporting text to Policy H2 sets out the various sources through which the housing requirement for West Oxfordshire will be met (excluding unmet need from Oxford City), as summarised in the table on page 6 of the attachment. Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement for West Oxfordshire of 13,200 over the Plan period. We do note that currently no allowance is made for additional allocations which could be brought forward</td>
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through Neighbourhood Plans of which there are currently five in preparation in the District, as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. There should be no delays to deliverability on any allocated site, in the context of a current 5 year housing land supply shortfall, and therefore reference to their delivery post-2021 should be deleted. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

The revised Policy as currently drafted states: “With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards.”

The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.
Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted within the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.

Other Matters

The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.

MAIN 27 – Strategic Development Areas

We support this proposed main modification in terms of the proposed increase in housing numbers at the North Witney SDA from 1,000 to 1,400 homes.

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**MM786**

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<td></td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2282</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>Para 5.30 Non-strategic housing allocations at the following sites cannot be supported due to the absence of commercial bus services and the lack of critical mass to create new bus services · Stanton Harcourt · Shipton-under-Wychwood. Any planning applications for these sites could result in a recommendation for refusal from the Highway Authority.</td>
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**MM788**

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<td></td>
<td>Mr Murray and Mr</td>
<td>Mr Murray and Mr</td>
<td>Mr Murray</td>
<td>2306</td>
<td>&gt; SECTION 5 - PROVIDING MAIN 27 - Paragraph 5.30b</td>
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2.19. The landowners object to the non-allocation of their land at Long Hanborough for housing development. Furthermore, they object to the allocation of land at Myrtle Farm on the basis that it is of questionable delivery as the landowner had made it clear that they do not intend to sell the site.

2.20. The landowners, support the acknowledgement in paragraph 5.31 that no allowance for housing development has been made for sites coming forward through the Neighbourhood Plan process, given the uncertainty associated with such matters. This further underlines the need for the Plan’s housing target to be expressed as a minimum to allow for potential increases in housing as a result of sites coming forward.

27. MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

28. We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.

29. We consider Leafield to be a suitable location for an additional development site being of the same status as several villages within which housing allocations are proposed. The proposed development site off Greenwich Lane (SHELAA ref 409) to be a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities which can benefit from safe access with suitable highway improvements.

5.29 Land to the east of Chipping Norton at Tank Farm (6001, 400 homes). How can this figure be increased from what was already going to be a significant impact (c. 600 homes) to more than doubled, when it is acknowledged that this will have very negative impacts on the traffic in town and pollution? See CN traffic survey:

9.1.4 Results of the indicative link capacity assessment indicate that by providing new highway infrastructure to the east of the town, delivery of either 850 homes or 1500 homes on the Tank Farm site would be expected to result in a reduction in flow on the A44 High Street / Horsefair corridor through the town centre (by 4% and up to 10% respectively) when compared to the 2031 Baseline plus 600 Unit Tank Farm development scenario. It should be noted however that predicted traffic flows on the High Street corridor for all development scenarios (+600 units, +850 or +1500) would be substantially higher than existing volumes as surveyed in 2016.

9.1.5 As the scale of proposed development on the Tank Farm site increases, the potential delivery of a new eastern link road connecting the A44 London Road to the A361 Burford Road (either by way of a central spine road in the case of the 850 Unit scenario tested or a distinct eastern distributor road in the case of the 1500 Unit scenario) would allow for redistribution of both development and background traffic that would reduce anticipated flows on the High Street corridor but result in increases elsewhere on the network (principally as a result of the impact of the increased level of development itself).

With reference to the increased number of housing allocated to the Tank Farm SDA, the key issue here is where the increased figure of 1400 comes from. The original figure of 600, which the Town voted on and approved via the referendum earlier in the year was judged to be sustainable, even though there were strong objections based on the perceived and real lack of pre-existing infrastructure at a level that might be considered appropriate for an extra 600 homes and the approximate 1100 vehicles likely to be owned by the
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| MM147         |                         | David Whetstone | Mr               | Whetstone         | 325        | MAIN 27            | For a town with circa 3,000 dwellings currently, expansion of 1,400 on the Tank Farm area to the east of town is completely disproportionate. It would of course completely change the town’s character, but in practical terms it would:  
- Develop a valuable farmland area that should not be developed, even though it is not formally included in the “conservation area”:  
- Increase the already excessive levels of (traffic) solution;  
- Make excessive demands on the town’s already stretched infrastructure - parking, health services and schools, water and drainage. |
| MM309         |                         | Phillip Parker  |                  | Parker            | 547        | MAIN 27 |Para 9.5.19: “Opportunities for walking, cycling and riding within the sub area are generally good due to the close proximity of Witney and Oxford to key settlements in the area.” They are good, but can be better – and the improvements required do not appear to have been objectively assessed. The location of new housing or the opportunity to improve walking and cycling between housing and existing facilities has not been objectively assessed. In particular, children in the new housing in North Woodstock are likely to be in the catchment area for Wootton primary school, while older children in Wootton go to school in Woodstock. Cycling links between Wootton and Woodstock need to be improved, but the plan does not recognise this, but needs to do so in order to comply with the Core Objectives CO11 (“maximise opportunity for walking and cycling”), Transport Policy T1 (“Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport.”) and Transport Policy TP3 (“All new development will be located and designed to maximise opportunities for walking, cycling and the use of public transport.”). |
| MM315         |                         | Richard Gwinn   |                  | Gwinn             | 570        | MAIN 27            | his modification increases significantly the number of properties to be built in the Chipping Norton SDA. This is backed up by unsound evidence and is not appropriate to the existing community. In particular:  
a) Part of the Vision in section 3.2 is to “play a role in helping to meet wider needs, without significant change to the intrinsic character of the District.” Increasing the population of the town by 50% will inevitably change its character. Especially as the driver for the increase is the need to house those working in Oxford, so turning a working town into a dormitory town. |

The increased figure of 1400 has no correlation to an existing local need. It is simply a means of moving housing away from Oxford. This pre-supposes that people will be happy to commute to Oxford from Chipping Norton. It is already the case that unless the commuter leaves early, the rush hour traffic in and approaching Oxford makes commuting by car difficult. Public transport options are extremely limited. Train services from Kingham are heavily restricted by the lack of car parking.  

I do not consider that a development of 1400 at Tank Farm is in any way sustainable, and the figure is arbitrary and the full implications have not been fully considered. |
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<td>b) Core Objective CO2 is to “Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.” This fails for the same reasons as the Vision statement.</td>
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<td>c) Core Objective CO3 is to “Promote safe, vibrant and prosperous town and village centres and resist proposals that would damage their vitality and viability or adversely affect measures to improve those centres.” Whilst a modest increase in population will help the town, this huge increase, aimed at commuters into Oxford, will be detrimental. The plan mentions that the proposed development is within walking and cycling distance of the town centre, although it offers no evidence to support this. I visit the town centre most days and have never seen more than one bicycle in the cycle parking there. The area around the town is too hilly for most of the population to cycle. A straw poll of people living in the Parkers Circus estate (which is closer to the town centre than is the SDA) indicates that none walk when going into town to do their shopping. These were all fit, active people. The town centre is also not safe. In the last few years, people have been killed by passing traffic while on the pavement at Horsefair. The proposed link road appears to be a “road to nowhere” as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this relief road. This increase in traffic will also affect air quality, which is already at illegal levels.</td>
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<td>d) Core Objective CO4 is to “Locate new residential development where it will best help to meet local housing needs and reduce the need to travel.” Policy T1 – Sustainable Transport says that “Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.” The increase proposed in the modification is mainly to serve Oxford. There is no train link to Oxford. The bus to Oxford takes over an hour and is infrequent. The bus service from Kingham Station does not wait if a train is delayed, resulting in a possible two-hour wait for the bus that meets the next train. I see no solution to this problem as buses have to keep to timetables. Everyone I know has stopped using this bus, resulting in more car journeys and a station car park that can’t cope. The alternative is to travel to the station by driving through country lanes and the village of Churchill in contravention of Policy T1. The increased local traffic will make air quality worse. There is nothing in the proposed plan to solve these problems.</td>
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<td>e) The proposed plan states in para 7.74 that “In Chipping Norton public car parking spaces in the town centre are insufficient to meet current needs.” There is nothing in the proposed plan to solve this problem.</td>
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<p>| MM363 | Oxford City Council | Ms Dell | 686 | Land and New Allocations |
|----------------------------------|
| It does appear that the new strategic site allocations (West of Eynsham &amp; the 'Garden City' Eynsham) together with increasing the capacity on the three existing strategic allocations provides sufficient land in principle to meet their SHMA targets and make a significant contribution to Oxford’s ‘unmet’ housing need. The two new strategic allocations in Eynsham (Garden Village and West of Eynsham) have emerged through the joint working arrangements and given their strategic spatial location appear to be best placed to help contribute to meeting Oxford’s ‘unmet’ housing need. |
| Support: The City Council therefore support in principle: |
| * Main Mod 16 Policy O2 ‘Locating development in the right places’, which identifies Eynsham and the |</p>
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<td>MM374</td>
<td>Carillion Capita</td>
<td>Jeremy Flawn</td>
<td>Mr</td>
<td>Flawn</td>
<td>721</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>Garden Village as the most appropriate allocations to help to meet Oxford’s unmet housing need. * Main Mod 23, and in particular paragraphs 5.20 and 5.21 which also confirm the importance of these two principal sites. * Main Mod 27 which then goes on to identify these sites as ‘strategic development areas’ in para 5.29 and 5.34d and * Main Mod 30 Policy H2 ‘Delivery of new homes’ which incorporates “further 2,750 homes in the period 2021 – 2031 to meet Oxford City’s housing needs.” Objection: Given Oxford’s acute housing shortage the City Council would seek some assurance that the deliverability of the two new strategic allocations will be prioritised over and above increasing the capacity on the three existing strategic site allocations. Otherwise there could be further delay in meeting the city’s urgent housing requirements, particularly bearing in mind this Plan only goes to 2031 and development will not start until 2021. The delivery of this housing is urgently needed to meet Oxford’s unmet housing need and therefore the City Council would expect an Area Action Plan for Eynsham and the Garden Village to be commenced at the earliest opportunity to take forward the delivery of these ‘Strategic Development Areas’.</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>759</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>MAIN 27 Para 5.29 Strategic Development Areas Stagecoach, in line with previous representations to the emergent Plan, notes and supports the focus of development at the largest and most sustainable settlements. Stagecoach notes and welcomes that the development strategy to address the additional quantum required to meet the Districts OAN, continues to focus on the largest settlements. These are best served by public transport and are those places where development is best placed, in the main, to unlock and catalyse further improvements to service with a wider public benefit. This is entirely sound, being consistent with NPPF para 17 and paras 29-35. However Stagecoach recognises and concurs with the evaluation and conclusion drawn from the evidence base, that Chipping Norton, Eynsham and Woodstock offer more appropriate opportunities to meet both the Districts growth requirements, and Oxford City’s unmet OAN, than attempting to find greatly more development capacity in and adjoining Witney, where opportunities are more constrained and where the impacts of development on local highways networks are clearly becoming hard to satisfactorily mitigate. The additional demand concentrated in each of these “second tier” settlements arising from development can be expected to lead to increases in service frequency and operating hours, especially where “pump-priming” funding can be applied from developments to de-risk the high opportunity costs involved in a District where distances to key destinations are relatively high. Stagecoach would suggest that this is in fact likely to catalyse a greater proportional improvement in the bus service offer, and its overall attractiveness, than development at Witney and Carterton. Stagecoach notes and supports the increase of the capacity of the Draft allocation East of Witney to 450 units. This site lies directly on the District’s most frequent inter-urban bus services, S1 and S2, with up to 9</td>
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buses per hour towards Oxford at peak times, and a new peak service direct to John Radcliffe Hospital. This S7 service is one we are strongly committed to maintaining and building up, serving the Oxford Eastern Arc directly. Once Science Transit Phase 1 is provided the journey time and reliability of this route ought to be competitive with car use.

Stagecoach notes and supports the biggest absolute and relative increase in growth directed to Tank Farm at Chipping Norton, where the site is now anticipated to accommodate 1400 dwellings - 800 more than the previous proposal. We note and welcome that this will provide for a key eastern link road which will have a very beneficial potential impact on bus routing, allowing service S3 to potentially serve much more of the whole town more directly. This does require suitable bus turning and layover facilities to be provided in the town centre. This growth, alongside that already committed and emergent on smaller sites, is likely to allow us to consider frequency increases on service S3 to Oxford to every 30 minutes. Subject to development taking place in Cherwell District, it may also prove to be possible to upgrade the 488 service to Banbury to broadly every 30 minutes.

Stagecoach notes and supports the logic for a new Strategic Development Area West of Eynsham, for 1000 units, most of this to meet locally-arising housing need. Considerable care needs to be taken to integrate the proposal with that for the new Park and Ride north of the A40, allowing buses both to continue beyond the P+R to penetrate and terminate at the site, and/or alternatively to efficiently serve the site via a new Eynsham Western Link Road. This offers potential for buses to route past the site en-route to Oxford, or alternatively towards Bampton, should it prove to be possible to extend buses serving the P+R beyond towards the upper Thames Valley. The formulation of Outline and more detailed proposals for this proposed allocation will need to take particular acre to address many sensitive matters, among which being the need to ensure all residents from first occupation have convenient access to an attractive bus service.

Stagecoach notes and broadly supports the logic for meeting Oxford’s unmet Objectively Assessed Housing Need (OAN) at a site for a New Settlement North of Eynsham. We concur that the evidence base shows that this is the nearest site to the City within the District that can serve that requirement, both minimising overall distance and time of travel to the City, and taking fullest advantage of proposed sustainable transport infrastructure to be provided by A40 Science Transit phase 1 and 2. As such the proposal is the “best fit” by far with NPPF paragraph 17 and 29-35, and therefore Stagecoach considers that this indeed represents the most appropriate solution having considered reasonable alternatives.

Much of the land identified will “wrap around” the Park and Ride site, and we urge OCC and development promoters in due course to fully integrate the P+R proposals with the emerging master plan for the new settlement. This should also seek to ensure initial phases are built out adjacent to the P+R, taking full advantage of the service provided there without the need to use a car at all. Emerging preferred options for the P+R layout do, we understand, make for such provision including for multiple points of pedestrian and cycle access to the terminal building from potential development land adjacent. We have also urged that a bus-only link, at least, is provided from the bus terminal into the Garden Village site to allow buses in due course to penetrate and terminate within the New Settlement, or to continue seamlessly and efficiently through towards Hanborough and employment opportunities north of Oxford.

However Stagecoach notes and objects to the identification of 400 additional dwellings North of Witney. Stagecoach does not believe that the evidence in any way points to this site being suitable, achievable or deliverable, as required by NPPF.

Stagecoach has already pointed out to the Examination that land north of Witney becomes progressively
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<td>762</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>harder to integrate into a relevant and attractive pattern of bus service provision, the further west from New Yatt Road one goes. Thus this land will be that much the more likely to be car-dependent, even if that is only to drive out of town to the new Park and Ride site at Eynsham, Hanborough Station, or a new P+R proposed in the Oxford Transport Strategy in the Begbroke/A44 area. This proposals therefore runs entirely contrary to the requirement in NPPF para 17 that patterns of development should be actively managed to make the fullest possible use of the opportunities for sustainable transport. On the contrary, this site would struggle to be served by any kind of bus service that would be relevant to meeting residents daily travel needs to a meaningful degree. Worse, modelling already before the Examination shows that even with the £18m West End Link Road provided, the 1000 dwellings previously proposed could be accommodated with small detriment to already unacceptable traffic conditions at Bridge Street. It follows therefore, that any additional quantum provided here would seriously affect this area, adding greatly to congestion-induced delay and unreliability on all our bus services serving the District. NPPF paragraph 32 makes clear that when cumulative unmitigated impacts are severe, development should not be consented. There is no evidence of any kind presented, that an additional 400 dwellings in this location could be accommodated, without already severe and chronic congestion being the result, even if the WELR is provided, something which is itself in some doubt. This aspect of the Plan is contrary to NPPF paras 17 and 29-35, and is evidently not the most appropriate solution when all reasonable alternatives have been considered contrary to paragraph 182. Accordingly, this aspect of the Plan is unsound. Irrespective of the planning merits of the enlarged site, it is also unclear that the enlarged site North of Witney is even deliverable. We are apprised that the land is unregistered and has no promoter, much less a housebuilder, on board. Given the fact that WODC repeatedly stressed the challenge of meeting the currently-proposed housing trajectory, this is both illogical and unhelpful. The Plan in this respect is ineffective, and is thus also unsound on that basis. Stagecoach therefore strongly urges WODC to re-examine the potential to accommodate development north of the town, to focus on a smaller quantum oriented towards the Woodstock Road, where much improved bus services could be provided; and that any residual quantum be redirected to other sustainable settlements. This could include Carterton, where at least two housebuilders with a strong track record are actively promoting strategic options that are omitted from the Plan.</td>
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<td>Stagecoach recognises and broadly supports the need to identify sustainable locations and carry these through to site-specific allocations, both strategic and non-strategic. The logic expressed at para 5.30a is on we understand and recognise carries weight, being well evidenced by the pattern of housing delivery in the District and County beyond, and indeed more generally. Stagecoach is concerned that many of the main strategic sites, and more than one of the larger non-strategic sites identified remain undelivered, despite their identification as suitable sites for development over several years. This is particularly true of land in Carterton, in the control of the DIO and associated organisations. We recognise that the housing needs of the Defence Estate are in a state of particular flux at this time, as the configuration and operational footprint of the armed forces remains subject to profound changes on an</td>
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<td>MM37</td>
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<td>Vanessa Mrs Sadler</td>
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<td>78</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>I want to comment on the increase housing in Woodstock in both the North and East in conjunction with the proposed housing in Chipping Norton and Long Hanborough. It seems that the housing proposed will take the total number of houses beyond 3000 houses. My concerns are: - increased traffic on the A44 coming through Woodstock will cause a major burden on the actual town - roads will see an enormous increase in traffic coupled with increased traffic coming from new homes in Hanborough Woodstock and Chipping Norton, Bladon roundabout is likely to be continually congested, it already has busy traffic through Bladon that impacts on traffic on the A44 with regular traffic accidents on the road between Bladon roundabout down to the Oxford Airport, this is only likely to increase with a potential new homes providing a possible, 4,500 drivers on to this stretch of road.</td>
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There is no clear citing of employment need in this area to meet the housing numbers you suggested, so we are looking at commuters, the local transport is expensive, does not meet the needs of locals already, and there is no train link to resource this level of build.

Traffic congestion will ultimately result in choked roads all along the A44, putting yet more pressure on the A34 and Oxford English road.

The Pear tree park and ride is already a bursting point for commuters in Oxford.

There is no parking in Oxford, Woodstock Rd is full already, where are the commuters going to put their cars?

re Woodstock

Increased housing for full schools, a GP surgery no longer fit for purpose, no capacity for increased parking in the town is going to kill the town, returning it to the times of pre M40!

Currently access to the north Hill Rise site can only be down Vermont Drive, this access if the park is moved, will cause increased congestion the A44 and residents and buses turning in Vermont Drive will be backing up into the estates.

The infrastructure for the small town Woodstock cannot service effectively increased housing around the town.

There is a real risk for the new housing to overburden the A44, increase traffic problems down its length, increase the risk for more road traffic accidents, kill off a special historic town and overburden local see ices and infrastructure.

With thanks
Vanessa Sadler

**Comments applying to all allocations**

**Masterplanning**

We have noticed that dwelling numbers have increased in a number of sub-area housing delivery tables (eg Main 91) and we wonder how housing numbers for individual sites have been determined. Considering the quantum of development proposed we are concerned that housing numbers might not be informed by necessary masterplanning and as a result might not allow for sufficient space for green infrastructure in form of gardens, open spaces, street tree planting etc within the developments. It is our experience that developers see dwelling numbers in a Local Plan not as a potential maximum that is subject to a number of criteria but as a given number and as such care needs to be taken that housing numbers are not overestimated.

We have not been able to find information which suggests that development capacity of individual sites has been determined and tested by masterplanning. We consider it important that all housing allocations are accompanied by such supporting information to provide confidence that housing can be delivered in a way that results in a high quality environment with sufficient green infrastructure and which is in keeping with the
### Ecological Baseline Surveys

We could not find ecological surveys for the majority of the allocation sites and are therefore not sure whether surveys have been carried out to inform the allocation of these sites. We welcome that allocations largely avoid direct effects on designated sites but sites might still comprise important nature conservation interest in form of priority habitats and protected species that needs to be taken into account. Para. 158 of the NPPF requires Local Planning Authorities to base local plan policies on adequate, up-to-date and relevant evidence. As such surveys are required to inform judgements on suitability and capacity. The potential lack of ecological surveys would be in conflict with the NPPF and could result in allocations being found unsound.

### Strategic Development Areas (MM27)

3.22 One of our gravest concern relating to the housing delivery strategy for the Local Plan is in relation to the high reliance on large strategic sites as listed in MM27. Whilst we do not object to the principle of the development locations per se, we do raise issues with the delivery that is expected from these sites over the plan period and in some cases, the physical capacity for them to deliver the targets suggested.

3.23 Indeed, the Council imply at paragraph 5.25 of the modified Local Plan that past completions have been low because of the lack of urgency from the development sector to bring strategic sites forward. The reality is strategic sites simply take time to properly plan and deliver, principally because their impacts are exponentially greater, they need thorough consideration, and the complexity of land ownerships and scale inevitably result in longer lead in times that those experienced with smaller, more moderate sites.

3.24 As set out in Table 3 below, SDAs are to provide 42.0%, 58.3% and 58.1% of the total number of homes required in the Witney, Chipping Norton and Eynsham-Woodstock sub-areas. This strategy needs to be considered with considerable caution. Should any of the SDA encounter delay to their delivery, these sub-areas and the district as a whole would not meet the housing requirement over the plan period. This is particularly pertinent in the case of Witney and Carterton where there are two very large commitments already which not listed in the table below (ATTACHED)

3.25 Table 4 (ATTACHED) identifies the five SDAs within the district and the number of homes they are expected to deliver over the plan period based on the Council's trajectory.

3.26 Understandably, the overall housing requirement from each of the five SDAs will only be achieved at the very end of the plan period. Thus, should the delivery of one or more SDA slip by just one or two years the plan will fail to meet its housing requirement over the plan period. This is not implausible given the complexity of delivering these SDAs, which we address in more detail in Section 4.

3.27 In order to explore delivery rates from large scale site such as the SDA’s identified in the Local Plan, it is important to be aware of the following three reports / assessment, which are all based a large amount of empirical data:

- A Report into the Delivery of Urban Extensions (Hourigan Connolly, February 2014) (Appendix 1)
- Urban Extensions, Assessment of Delivery rates (Savills, October 2014) (Appendix 2)
- Start to Finish: How Quickly do large-Scale Housing Sites Deliver? (NLP, November 2016) (Appendix 3)
3.28 The Hourigan Connolly report on the delivery of urban extensions highlights the difficulties and time it can take to bring forward such sites. It is worth highlighting the following key factors as reported in Section 15 of that document, namely the average times for the various stages of the planning process. These are:

- Average timescale from submission to grant of outline planning permission is 34 months;
- Average timescale for signing a legal agreement 24 months; and,
- Reserved matters applications 6-9 months.

3.29 Subsequent to that report, the Savills report looks at urban extensions and their delivery rates. In terms of lead in time the report is clear that a period of 3-4 years from the determination of an outline planning application to the completion of site preparation and the delivery of housing is a realistic average time scale for the delivery of housing. The study notes that sites which have particularly complex land packages and or significant strategic infrastructure to deliver can take significantly longer than estimated. The report lists examples of sites where Section 106 agreements in themselves have taken 64 months to agree, with the average being 14 months.

3.30 The Savills report goes on to consider how fast a major site may build out. On average it found that in the first year of construction a site delivered 65 units, this increased to 110-120 dwellings per annum in subsequent years, before dropping towards the end of the life cycle of the development. These rates are obviously averages and dependant on a range of factors, however the report makes clear that any spikes on sites considered within the report were down to very specific delivery factors e.g. the need to deliver a large lump of affordable housing in one go due to the funding requirements of a partner.

3.31 The NLP report relates to housing delivery and assesses 70 large schemes (500 homes+) which have come forward in the last 20 years, and 83 smaller sites (50-499 homes). The report commented on average delivery from conception to start on site looking at:

- Lead in time prior to submission of an application;
- Planning approval period; and,
- Annual build out rates.

3.32 The average lead-in time for large sites is identified by NLP as 3.9 years (i.e. from the point a site is first identified in a Local Plan).

3.33 The planning approval period is measured from the validation date of the first application for the proposed development. The end date is the decision date of the first detailed application which permits the development of dwellings on site. The planning approval period of all sites, both large and small, is identified by NLP as:

- 2.8 years (0-99 homes)
- 4.1 years (100-499 homes)
- 5.3 years (500-999 homes)
- 5.6 years (1000-1499 homes)
- 6.5 years (1500-1999 homes)
- 6.9 years (2000+ homes)

3.34 NLP also identify the annual build-out rate falls within the overall build period of each site. The annual build out rates are influenced by the size of the site and NLP arrives at the following:
3.35 There are clear comparable and a common themes running through each of the three assessment (i.e. large sites take time to delivery).

3.36 Given NLP's assessment is the most recent, we have considered the trajectory from each of the West Oxfordshire SDAs using the two different variables (build out rates and lead-in times). Under each scenario, the full delivery of the 6,450 homes identified within the SDAs are not delivered during the plan period resulting in a shortfall in the delivery of the housing requirements of the district ranging from 2,210 to 2,311 homes.

3.37 Table 5 (Attached) applies the NLP lead-in time to the Council's build-out rates, and identifies that the Chipping Norton, Garden Village and West Eynsham SDA would not be delivered in full during the plan period, resulting in an overall shortfall of 2,210 homes over the plan period.

3.38 Table 6 (Attached) applies both the NLP build-out rates and lead-in times from first identification of the SDA, and identifies that only the East Witney SDA would be delivered in full during the plan period, resulting in an overall shortfall of 2,311 homes over the plan period.

Conclusions Applying NLP Recommendations on Delivery

3.39 Whilst applying the NLP assumptions is a theoretical approach to identifying the delivery of the five SDAs over the plan period, the assumptions are based on empirical data from a large number of development proposals. As such, it cannot be dismissed out of hand. However, we do recognise that there is a need to consider the specific circumstances in relation to West Oxfordshire and each of the SDA sites identified. Nevertheless, the above exercise clearly demonstrates that the Council's trajectory certainly needs to be considered with significant caution.

3.40 We go on to present our own view and final position on the Council's trajectory / delivery from the SDAs in Section 4 having reviewed each of the sites in more detail including their ability to accommodate the suggested number of dwellings. Following this analysis is our final position that is out in Table 7 below (Attached).

3.41 As per the NLP analysis, we agree that East Witney will be completed. We have some genuine concerns over the delivery of the West Eynsham site for a range of reasons but ultimately conclude that this site could potentially be complete within the plan period. However, we take greater issue with the ability for the following three SDAs to deliver within the plan period for reasons set out below and conclude/calculate a shortfall of 1,784 dwellings from these SDA's over the plan period:

- Chipping Norton SDA – not capable of accommodating the number of homes proposed;
- North Witney SDA – will not commence or deliver at the rate the Council anticipate; and,
- Garden Village SDA – will not commence or deliver at the rate the Council anticipate.
1. DELIVERABILITY ASSESSMENT – WITNEY ROAD DUCKLINGTON

1.1 ASL have an interest in land to the east of Witney Road, Ducklington.

1.2 The site is not currently identified in the Submission Draft Local Plan, but is considered to be available, suitable and achievable for the delivery of 105-130 dwellings, which will help to meet the borough’s future housing needs.

1.3 We have submitted general representations on the policies within the Local Plan (Ref: ST/MAN.0190/R011- sections 2-4), which raise concerns over the deliverability of the proposed housing strategy and allocations, particularly the overreliance on delivery from the five Strategic Development Areas; and suggest that additional sites will need to be identified to meet needs within the emerging plan period.

1.4 In light of these wider concerns, it is our strong view that the Witney Road site should be allocated for housing.

1.5 This document assesses the site’s characteristics and deliverability in more detail and should be read alongside the associated Site Context Plan, which is included at Appendix 1.

Site Location and Description

1.6 This 6.5 Ha site is located to the north of the village of Ducklington, which is on the southern fringe of Witney, approximately 2km south of Witney Town Centre.

1.7 The site comprises open greenfield land, which is flat and rectangular in shape, with a footpath running through the centre of the site, along with overhead power lines. The site is well screened by trees and vegetation on all sides.

1.8 To the west the site is bound by Witney Road, with residential development opposite. There are allotments to the north, with a hotel and the A40 dual carriageway beyond that. To the west the site is bound by Witney Lake and Country Park. To the south is an electricity substation, which is set in open fields, with the main residential area of Ducklington further south.

1.9 Ducklington itself is a semi-rural village, with a central Conservation Area, characterised by traditional thatched cottages and barns, surrounded by more modern residential development.

1.10 In policy terms, the site is designated as a ‘policy area to prevent urban sprawl and protect existing character’ under Policy NE2 of the adopted plan, albeit this plan only covered the period until 2011, and this policy has not been carried forward in the emerging Plan. The site is not subject to any other landscape or environmental designations; nor is it within a flood risk zone.

1.11 In terms of local services, the centre of Ducklington lies 750m south of the site, which includes a public house, two churches, a village hall and a primary school. There is also a farm shop and petrol filling station 250m north of the site at the junction with the A40. There are also bus stops within 250m of the site with regular services to Witney, Standlake, Bampton, Carterton and Abingdon.

1.12 A greater range of shops and facilities can be found in Witney, with the Main Town Centre located 2km north of the site by road, or just 1.5km via a footpath and cycle link under the A40. There are also additional out of centre facilities closer to the site, such as the retail units on Ducklington Lane, 600m north of the site,
which include a Lidl, Tesco Express and McDonald’s, as well as a range of trade counters including B&Q and Screwfix.

Proposed Development

1.13 The attached context plan confirms the site is capable of delivering between 105 and 130 homes across a developable area of 4.4 Ha, with a net density range of 25-30 dwellings per hectare.

1.14 Vehicular access is proposed from Witney Road, between Dale Walk and Moors Close, with the option for additional footpath linkages, including a link with the Country Park in the north east corner of the site which has a direct connection to Witney Town Centre via a footpath and cycle link under the A40.

1.15 The development will be concentrated in two main parcels accessed via a central Village Lane, with shared space squares and courtyards; separated by an informal linear park which provides a buffer around the existing footpath, to preserve its character and openness; whilst the routes of other minor footpaths are also preserved within the layout.

1.16 Substantial areas of open space, totalling 2.1 Ha (which equates to over 30% of the site area), are also proposed to the east of the site to provide a sympathetic, semi-rural buffer to the Country Park and electricity substation.

Deliverability Criteria

1.17 The NPPF and NPPG specify that local planning authorities supply sufficient specific deliverable sites to deliver housing in the first 5 years. To be considered deliverable, sites should, at the point of adoption of the relevant local development document:

* Be available – there is confidence that there are no legal or ownership problems.
* Be suitable – it offers a suitable location for development and would contribute to the development of sustainable and mixed communities.
* Be achievable – there is a reasonable prospect that housing will be developed on the site at a particular point in time.

1.18 This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors.

Available

1.19 ASL have legal control of the whole site, through a development option with the landowner, and are seeking to promote it for development at the earliest opportunity. Furthermore, there are no ransom strips, tenancies or other ownership problems which could prevent or delay this.

Suitable

1.20 As such, the site in the control of a nationally recognised strategic land company, with a proven track record, and must be regarded as wholly available.

1.21 The NPPG requires that the suitability of sites should be guided by the development plan, emerging plan and national policy; as well as the market and industry requirements in the housing market area (Ref: 3-019-20140306).
1.22 In this instance, the adopted plan only provides for development needs to 2011, and therefore policies such as NE2, which restrict development around Witney and Carterton, must be considered out of date.

1.23 The emerging Submission Draft Local Plan has sought to allocate additional sites to meet the increased housing need over the period to 2031, and whilst we have concerns with the proposed development strategy (as raised in our general representations, R011), it is pertinent that the Plan does not carry forward or replace policy NE2. In fact, it actually includes housing allocations on sites previously designated under Policy NE2 (including the North Witney SDA and parts of the East Witney SDA), which confirms that this designation is no longer applicable, and can be given little weight.

1.24 One of our major concerns with the plan relates to alternative options considered through the Sustainability Appraisal process. In the case of Witney (see Main Mod 92), 5 growth options were assessed within the Pre-Submission Draft, Sustainability Appraisal Report, February 2015 (CD2); however expansion of Ducklington was not considered as an option, even though it is directly adjacent to Witney with a settlement gap of just a few hundred metres, and would seem to be a logical location for at least some growth.

1.25 The open countryside to the west of Ducklington, known as ‘land south of A40’, was one of the options; however this was dismissed on the basis that it was severed from Witney by the A40, and would generate amenity issues due to a nearby abattoir and sewage works. Development at the Witney Road site or in other locations to the north of Ducklington would not have the same amenity constraints and are better related to Witney, with road access under the A40 via the A415 Ducklington Lane and direct pedestrian and cycle access via a separate underpass adjacent to the Country Park.

1.26 Notwithstanding the alternative growth options for Witney, there is also an argument that the overall strategy for West Oxfordshire should have considered more dispersed growth across individual villages in the eastern part of the borough to help meet Oxford’s unmet need; as an alternative to focussing on Eynsham (and specifically the Garden Village SDA and West Eynsham SDA (see Main Mod 159)).

1.27 As such it is our view that the Witney Road site, and north Ducklington in general, is a suitable location for development, that was not given proper consideration during the Local Plan process.

1.28 In terms of market and industry requirements, ASL’s interest confirms that this is a suitable location for residential development from a commercial perspective.

Location and Accessibility

1.29 Whilst not specifically listed in the NPPG, access to services is a key consideration of suitability. In this instance the site is in a highly accessible and sustainable location with numerous facilities within walking distance, both within the village of Ducklington and the larger urban area of Witney, all of which can be reached by good quality footways.

1.30 In terms of retail uses, a Lidl supermarket and Tesco Express convenience store are located within 600m of the site, with a Sainsbury’s and Waitrose within 1.5km (via a footpath and cycle link under the A40, or 2km via road), along with a range of other national operators, services and employment uses in Witney Town Centre.

1.31 In respect of community facilities, Ducklington contains a primary school, along with a pub, village hall and churches; whilst the urban area of Witney contains 10 primary schools and 4 secondary schools. In
addition, the Witney Lake and Country Park provides a key recreation facility which is directly adjacent to the site and there are several other sport and leisure facilities within Witney including the Windrush Leisure Centre and The Leys Recreation Ground.

1.32 There are bus stops within 250m of the site with regular services to Witney and other higher order centres including Carterton and Abingdon. In respect of cycling, the A415 road has dedicated cycle lanes, and the development can provide linkages between Witney Road, Witney Lake and Country Park, and the dedicated cycle link to Witney that passes under the A40. The site is also directly adjacent to the A40 junction which connects it with the national road network.

1.33 As such, the site is a sustainably located development opportunity located within easy access of a range of local services, employment opportunities and public transport routes.

Constraints and Impacts

1.34 The NPPG goes on to list several further criteria for assessing suitability which we address in turn below:

* Physical limitations and constraints (access, ground conditions, flood risk, etc.) – There are no physical constraints preventing development of the site as it is flat, is not within a flood zone, and can take direct vehicular access from Witney Road. The existing footpaths and power lines can be incorporated into the development, and initial assessments suggest that the development can utilise existing infrastructure surrounding the site without generating utilities or drainage issues.

* Landscape impacts (including nature and heritage) – Whilst the site was designated as part of a ‘green gap’ to prevent urban sprawl under Policy NE2, it is clear that this policy is out of date and that this land no longer serves this function, given that there is development on 3 sides of the site, with residential properties to the west, a substation to the south, and a hotel and the A40 dual carriageway to the north, which still serves as the key physical boundary and separator of Witney and Dücklington. In view of the development of this site will represent infill development, rounding off the north of the settlement. Furthermore, it will be sympathetically integrated with the open land and Country Park to the east and south, through planting and a large open space buffer. In addition, the site is not subject to any ecological or environmental designations or constraints that would prevent its development; and is some distance from Dücklington Conservation Area and associated Listed Buildings, ensuring that any heritage impacts would be minimal.

* Market attractiveness – As noted above, ASL’s land interest suggests that the site is in an attractive market location, which it is, as it falls on the edge of the attractive semi-rural village of Dücklington with its central Conservation Area of thatched cottages; whilst also being in close proximity to Witney, which is the largest settlement in West Oxfordshire, and a key service centre for retail and employment opportunities, making it an extremely desirable location.

* Contribution to regeneration priority areas - Development in this area is not a regeneration priority, but new development here will generate additional household spending which will help to support additional shops and services in Dücklington and Witney.

* Amenity impacts on occupiers and neighbouring areas - The proposed development will have minimal impacts on surrounding developments as it is well screened, sensitively integrated with the adjacent Country Park, and will deliver generous areas of open space for use by residents and the local community.

1.35 The site is therefore suitable in accordance with the NPPF and the NPPG.

Achievable

1.36 The delivery of between 105 and 130 dwellings would make a significant contribution towards meeting
the housing needs of the Borough. An initial assessment of the site constraints has been undertaken which illustrates that delivery of the entire site is achievable and deliverable, and a professional team of technical experts has been appointed to underpin this assessment and support the delivery of the site moving forward. Where any potential constraints are identified, ASL has considered the necessary mitigation measures and investment required to overcome any deliverability barriers.

1.37 ASL has reviewed the economic viability of the proposal in terms of the land value, attractiveness of the locality, potential market demand; as well as the cost factors associated with the site including preparation costs and site constraints. Where potential constraints have been identified; ASL has considered the necessary mitigation measures and will use investment in order to overcome any deliverability barriers. ASL can, therefore, confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that residential development can be achieved within 5 years.

Conclusion

1.38 This assessment has confirmed that the Witney Road site is available, suitable and achievable in accordance with the latest national guidance and should therefore be allocated for residential development in the West Oxfordshire Local Plan 2031.

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<td>Barwood Land</td>
<td>Barwood Land</td>
<td>Mrs Entwistle</td>
<td>918</td>
<td>&gt; SECTION 5 PROVIDING NEW HOMES &gt; MAIN 27</td>
<td>WYG are instructed by Barwood Land to prepare and submit representations to the current consultation on the Proposed Modifications to the Submission Draft West Oxfordshire Local Plan 2031. Barwood has land interests in the area which are outside of but adjacent to the proposed North Witney Strategic Development Area (SDA). The purpose of these representations is to support the increased housing requirement set out in the Proposed Modifications to the emerging Local Plan and also to request that the Council gives further consideration to this land as a potential allocation to both help meet the Council's now identified Local Plan housing requirement, and which would, in turn, assist the Council in maintaining a demonstrable five year housing land supply. The land interests of my client, which lie outside of the proposed North Witney SDA are identified on the attached plan. It is understood that the Council has not considered this land as a potential site allocation in any detail, but that additional submissions promoting the deliverability of the site as a sustainable location, would be taken into consideration. It is acknowledged that following the Inspector’s Preliminary Findings (IN 015) which stated at para 5.8 that the Council would need to identify and allocate further deliverable housing sites, the Council have made efforts to identify and indeed allocate, additional land for housing development. However, as set out on Page 6 of the Council’s Housing Land Supply Position Statement dated October 2016, identified site allocations and existing commitments over the Plan period total 11,518 dwellings (existing and proposed commitments). This is some way below the Council’s proposed housing target of 15,950 new dwellings over the Plan period. Coupled with an only marginally demonstrable 5 year land supply (as set out in the October 2016 Housing Position Statement) of 5.49 years, it is evident that the Council will need to find further additional land for development across the Plan period to 2031. It is my Client’s position that their land interests, as identified on the attached Plan, comprise approximately 7 hectares and is considered available, deliverable and suitable for residential development, to meet the Council’s identified housing needs across the Plan period 2011-2031. To this end, my client is progressing early Technical Assessment work to consider and develop a proposed scale of development which could be</td>
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suitably accommodated on the land. This will be presented within a Delivery Plan Document to be submitted to the Council in early 2017.

Notwithstanding the imminent preparation of a Delivery Plan Document, the additional land would be a logical, and a well-defined 'Phase 2' to the proposed North Witney SDA. There is opportunity and control to provide access from the land west of Hailey Road that is within the proposed North Witney SDA in the emerging Local Plan and its development would not result in any pressure on the issue of coalescence between Witney and Hailey.

Prior to the submission of the Delivery Plan Document, it is requested that the Council give further consideration to the allocation of additional land at Witney as identified on the attached plan and in this letter, to provide further housing development that will assist in meeting identified requirements for the provision of 15,950 dwellings across the Plan period.

We welcome that the majority of the additional sites allocated in the proposed modifications are located within Flood Zone 1.

Sites of Least Environmental Value

In accordance with the NPPF, the plan's development strategy should seek to avoid areas of high environmental value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and should consider the direct and indirect effects of development on land within the setting of designated landscapes.

Protected Landscapes

The plan area includes the Cotswolds Area of Outstanding Natural Beauty (AONB). We advise the LPA to take into account the relevant Management Plan for the area; the LPA should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

Designated Sites

Screening of the Local Plan under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) should be updated in light of the proposed modifications so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

Natural England would welcome discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.
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| MM425         | Carterton Construction  | -              | Carterton Construction | -               | 963        | > SECTION 5 - PROVIDING NEW HOMES > MAIN 27 | 2.23 We have set out our comments in respect of the Council's proposed housing target in relation to main modification 24 and as such do not repeat these here...
Sources of Supply

2.24 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED)

2.25 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period.

2.26 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

2.27 The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

2.28 The revised Policy as currently drafted states: "With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

2.29 The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.30 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

"To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5 years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield..."
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2.31 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

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2.33 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.34 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

2.35 In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

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<td>1664</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 28</td>
<td>Other Matters</td>
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2.37 The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.

Main 25 - 30 – Policy H2 – Delivery of New Homes and Supporting Text

2.21 We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.. Sources of Supply

2.22 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED)

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Initial Findings: Part 2.

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<tr>
<td>MM67</td>
<td>Miss Kirsty Garrett</td>
<td>Miss</td>
<td>Garrett</td>
<td>171</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 28</td>
<td>Chipping Norton has cooperated with the provision of new housing, by identifying a number of areas suitable for development. It seems that it has been penalised for this by the imposition of significantly more housing than was proposed and supported locally. I do not consider that sufficient attention has been paid to Chipping Norton’s neighbourhood plan - and the exclusion of housing to be included in neighbourhood plans means that it is likely that too many houses are being imposed on the major development sites.</td>
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<tr>
<td>MM745</td>
<td>Gladman Developments Limited</td>
<td>Richard House (Gladman)</td>
<td>Mr</td>
<td>House</td>
<td>1792</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 28</td>
<td>6.1 This modification is intended to clarify the contribution of neighbourhood plans in potentially identifying housing sites. The wording of the modification explains that the housing supply figures in the plan assumes that no new housing will be delivered through neighbourhood plans because of uncertainty over how much they will actually deliver. Gladman has strong concerns about this approach as it is likely that in those areas where no development is allocated, neighbourhood plans will be under no compulsion to allocate housing sites. This is inconsistent with the objective of the NPPF to significantly boost housing supply and to promote sustainable development in rural areas. The Local Plan should therefore plan positively and include a minimum figure for the number of dwellings expected to be delivered through the preparation of neighbourhood plans.</td>
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<td>Bloombridge</td>
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<td>Mr</td>
<td>Cutler</td>
<td>1906</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 28</td>
<td>Non-Strategic Housing Allocations</td>
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<td>Objection is raised to MM28 (Paragraph 5.30b) which should be modified to include Land North of Swinbrook Park (115 homes) and Land at North Carterton, Kilkenny Farm (750 homes) and to omit the following sites:</td>
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<tr>
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<td>a. Milestone Road, Carterton (200 homes): not deliverable;</td>
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<td>b. Land at Swinbrook Road (70 homes): not deliverable;</td>
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<td>c. Land North of Jefferson's Place, Charlbury (40 homes): within AONB - exceptional circumstances not demonstrated;</td>
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<td>d. Land North of Banbury Road, Woodstock (250 homes): impact on setting of World Heritage Site;</td>
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<td>e. Land North of Woodstock Road, Stonesfield (50 homes): within AONB - exceptional circumstances not demonstrated;</td>
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<td>f. Land east of Burford (85 homes): within AONB - exceptional circumstances not demonstrated;</td>
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Non-Strategic Housing Allocations

Objection is raised to MM28 (Paragraph 5.30b) which should be modified to include Land North of Swinbrook Park (115 homes) and Land at North Carterton, Kilkenny Farm (750 homes) and to omit the following sites:

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b. Land at Swinbrook Road (70 homes): not deliverable;

c. Land North of Jefferson's Place, Charlbury (40 homes): within AONB - exceptional circumstances not demonstrated;

d. Land North of Banbury Road, Woodstock (250 homes): impact on setting of World Heritage Site;

e. Land North of Woodstock Road, Stonesfield (50 homes): within AONB - exceptional circumstances not demonstrated;

f. Land east of Burford (85 homes): within AONB - exceptional circumstances not demonstrated; and

g. Land south of Milton Road, Shipton-under-Wychwood (44 homes): within AONB - exceptional circumstances not demonstrated.

Our client supports the Council’s position that smaller ‘non-strategic’ allocations can help to ensure a deliverable housing supply in the short-term. Accordingly 15 ‘non-strategic’ sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings.

Of these, land north of Hill Rise, Woodstock has been identified as a proposed allocation for the provision of 120 dwellings. Our Client supports the allocation of land within Woodstock which is identified as a Rural Service Centre and therefore, is one of the most sustainable settlements within the District.

The content of paragraph 9.5.41q (MM 164) identifies that there are landscape sensitivities which relate to the site and that any scheme would need to incorporate landscape mitigation measures. In this regard it is noted that the proposed allocation identified in MM 165 does not follow any natural boundaries but follows an arbitrary line within a larger field. To minimise the landscape impact of the development the boundaries of the allocation should be extended to the natural boundary line therefore ensuring that maximum screening can be achieved. Furthermore, our Client owns land in the vicinity which could be used to provide additional landscaping and/or open space to maximise the development potential of the allocated site.

These paragraphs refer to existing commitments, Strategic Development Areas and Non-Strategic Housing Allocations. This demonstrates an extremely high reliance on large sites forming a component of the housing supply including: 4,107 dwellings on sites with planning permission or a resolution to grant; 6,450 dwellings on SDAs (principally sites over 1,000 dwellings) which do not currently benefit from planning permission; and several Non-Strategic sites of 200 or dwellings, again without planning permission at present. This equates to 73% of the overall housing requirement on large sites, the majority of which are located within the 3 MRCs, whilst only 304 dwellings are committed/allocated within 5 of the 34 Villages.

Whilst it is acknowledged that the majority of growth should be directed to the most sustainable locations within the District in line with the settlement hierarchy, it should also be recognised as detailed at paragraph...
4.17 of the Draft Plan, that not all growth “can or indeed should go to Winery, Carterton and Chipping Norton” as there is a need for development elsewhere in the District in order to spread the benefits of growth to help sustain the more rural parts of the District. This is supported by the guidance at Paragraphs 54-55 of the NPPF and within the PPG in respect of Rural Housing, which highlights the need to recognise the particular issues facing such areas in terms of housing supply and affordability, and the role housing has in supporting the broader sustainability of villages by helping to retain local services and community facilities such as schools, local shops and cultural venues.

The extremely limited housing allocations to a handful of Villages ignores the potential availability of other sites within some of the other larger Villages, which are more sustainable- with reference to the Council’s updated Settlement Sustainability Report (December 2016), no housing allocations have been identified at 3 of the top 5 most sustainable Villages (North Leigh, Brize Norton and Enstone). This appears contrary to the Plan’s Vision and Core Objectives which highlight the challenge facing residents in view of house prices well above the national average and the special emphasis on providing homes for local people in housing need (CO6).

RSL are promoting a site at land south of Oxford Road, Enstone (see enclosed Location Plan) is just one example. This is a site adjacent to the settlement boundary, outside the Cotswold AONB and is otherwise deliverable, achievable and viable with no technical constraints that would prevent it from coming forward in the next 5 years.

We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here..

Sources of Supply

The supporting text to Policy H2 sets out the various sources through which the housing requirement for West Oxfordshire will be met (excluding unmet need from Oxford City), as summarised in the table on page 6 of the attachment.

Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement for West Oxfordshire of 13,200 over the Plan period.

We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District, as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is falling not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. There should be no delays to deliverability on any allocated site, in the context of a current 5 year housing land supply shortfall, and therefore reference to their delivery post-2021 should be deleted. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.
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The revised Policy as currently drafted states: "With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

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Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should
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| MM376         | Stagecoach in Oxfordshire/Stagecoach West | Nick Small, Stagecoach Bus | Dr | Small | 764 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 28 | come forward.  
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| MM388         | Ainscough Strategic Land | Ainscough Strategic Land | - | Ainscough Strategic Land | 665 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 28 | Strategic Development Areas (MM27)  
3.22 One of our gravest concern relating to the housing delivery strategy for the Local Plan is in relation to the high reliance on large strategic sites as listed in MM27. Whilst we do not object to the principle of the development locations per se, we do raise issues with the delivery that is expected from these sites over the plan period and in some cases, the physical capacity for them to deliver the targets suggested.  
3.23 Indeed, the Council imply at paragraph 5.25 of the modified Local Plan that past completions have been low because of the lack of urgency from the development sector to bring strategic sites forward. The reality is strategic sites simply take time to properly plan and deliver, principally because their impacts are exponentially greater, they need thorough consideration, and the complexity of land ownerships and scale inevitably result in longer lead in times that those experienced with smaller, more moderate sites.  
3.24 As set out in Table 3 below, SDAs are to provide 42.0%, 58.3% and 58.1% of the total number of homes required in the Witney, Chipping Norton and Eynsham-Woodstock sub-areas. This strategy needs to be considered with considerable caution. Should any of the SDA encounter delay to their delivery, these sub-areas and the district as a whole would not meet the housing requirement over the plan period. This is particularly pertinent in the case of Witney and Carterton where there are two very large commitments already which not listed in the table below (ATTACHED) |
3.25 Table 4 (ATTACHED) identifies the five SDAs within the district and the number of homes they are expected to deliver over the plan period based on the Council's trajectory.

3.26 Understandably, the overall housing requirement from each of the five SDAs will only be achieved at the very end of the plan period. Thus, should the delivery of one or more SDA slip by just one or two years the plan will fail to meet its housing requirement over the plan period. This is not implausible given the complexity of delivering these SDAs, which we address in more detail in Section 4.

3.27 In order to explore delivery rates from large scale site such as the SDA's identified in the Local Plan, it is important to be aware of the following three reports / assessment, which are all based a large amount of empirical data:

* A Report into the Delivery of Urban Extensions (Hourigan Connolly, February 2014) (Appendix 1)
* Urban Extensions, Assessment of Delivery rates (Savills, October 2014) (Appendix 2)
* Start to Finish: How Quickly do large-Scale Housing Sites Deliver? (NLP, November 2016) (Appendix 3)

3.28 The Hourigan Connolly report on the delivery of urban extensions highlights the difficulties and time it can take to bring forward such sites. It is worth highlighting the following key factors as reported in Section 15 of that document, namely the average times for the various stages of the planning process. These are:

* Average timescale from submission to grant of outline planning permission is 34 months;
* Average timescale for signing a legal agreement 24 months; and,
* Reserved matters applications 6-9 months.

3.29 Subsequent to that report, the Savills report looks at urban extensions and their delivery rates. In terms of lead in time the report is clear that a period of 3-4 years from the determination of an outline planning application to the completion of site preparation and the delivery of housing is a realistic average time scale for the delivery of housing. The study notes that sites which have particularly complex land packages and or significant strategic infrastructure to deliver can take significantly longer than estimated. The report lists examples of sites where Section 106 agreements in themselves have taken 64 months to agree, with the average being 14 months.

3.30 The Savills report goes on to consider how fast a major site may build out. On average it found that in the first year of construction a site delivered 65 units, this increased to 110-120 dwellings per annum in subsequent years, before dropping towards the end of the life cycle of the development. These rates are obviously averages and dependant on a range of factors, however the report makes clear that any spikes on sites considered within the report were down to very specific delivery factors e.g. the need to deliver a large lump of affordable housing in one go due to the funding requirements of a partner.

3.31 The NLP report relates to housing delivery and assesses 70 large schemes (500 homes +) which have come forward in the last 20 years, and 83 smaller sites (50-499 homes). The report commented on average delivery from conception to start on site looking at:

* Lead in time prior to submission of an application;
* Planning approval period; and,
* Annual build out rates.

3.32 The average lead-in time for large sites is identified by NLP as 3.9 years (i.e. from the point a site is first
### Table 5 (Attached)

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3.33 The planning approval period is measured from the validation date of the first application for the proposed development. The end date is the decision date of the first detailed application which permits the development of dwellings on site. The planning approval period of all sites, both large and small, is identified by NLP as:

- 2.8 years (0-99 homes)
- 4.1 years (100-499 homes)
- 5.3 years (500-999 homes)
- 5.6 years (1000-1499 homes)
- 6.5 years (1500-1999 homes)
- 6.9 years (2000+ homes)

3.34 NLP also identify the annual build-out rate falls within the overall build period of each site. The annual build-out rates are influenced by the size of the site and NLP arrives at the following:

- 27 dwellings per annual (dpa) (0-99 homes)
- 60 dpa (100-499 homes)
- 68 dpa (500-999 homes)
- 105 dpa (1000-1499 homes)
- 135 dpa (1500-1999 homes)
- 161 dpa (2000+ homes)

3.35 There are clear comparable and a common themes running through each of the three assessment (i.e. large sites take time to delivery).

3.36 Given NLP’s assessment is the most recent, we have considered the trajectory from each of the West Oxfordshire SDAs using the two different variables (build-out rates and lead-in times). Under each scenario, the full delivery of the 6,450 homes identified within the SDAs are not delivered during the plan period resulting in a shortfall in the delivery of the housing requirements of the district ranging from 2,210 to 2,311 homes.

3.37 Table 5 (Attached) applies the NLP lead-in time12 to the Council’s build-out rates, and identifies that the Chipping Norton, Garden Village and West Eynsham SDA would not be delivered in full during the plan period, resulting in an overall shortfall of 2,210 homes over the plan period.

3.38 Table 6 (Attached) applies both the NLP build-out rates and lead-in times from first identification of the SDA, and identifies that only the East Witney SDA would be delivered in full during the plan period, resulting in an overall shortfall of 2,311 homes over the plan period.

Conclusions Applying NLP Recommendations on Delivery

3.39 Whilst applying the NLP assumptions is a theoretical approach to identifying the delivery of the five SDAs over the plan period, the assumptions are based on empirical data from a large number of development proposals. As such, it cannot be dismissed out of hand. However, we do recognise that the there is a need to consider the specific circumstances in relation to West Oxfordshire and each of the SDA sites identified. Nevertheless, the above exercise clearly demonstrates that the Council’s trajectory certainly needs to be
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| MM425         | Carterton Construction  | -               | Carterton        | 964        | > SECTION 5 - PROVIDING NEW HOMES > MAIN 28 | 2.23 We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here. Sources of Supply  
2.24 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED)  
2.25 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period.  
2.26 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.  
2.27 The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.  
Five Year Housing Land Supply  
2.28 The revised Policy as currently drafted states: “With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards.” |

considered with significant caution.

3.40 We go on to present our own view and final position on the Council’s trajectory / delivery from the SDA’s in Section 4 having reviewed each of the sites in more detail including their ability to accommodate the suggested number of dwellings. Following this analysis is our final position that is out in Table 7 below (Attached).

3.41 As per the NLP analysis, we agree that East Witney will be completed. We have some genuine concerns over the delivery of the West Eynsham site for a range of reasons but ultimately conclude that this site could potentially be complete within the plan period. However, we take greater issue with the ability for the following three SDAs to deliver within the plan period for reasons set out below and conclude/calculate a shortfall of 1,784 dwellings from these SDA’s over the plan period:

* Chipping Norton SDA – not capable of accommodating the number of homes proposed;
* North Witney SDA – will not commence or deliver at the rate the Council anticipate; and,
* Garden Village SDA – will not commence or deliver at the rate the Council anticipate.
2.29 The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.30 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

2.31 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.32 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.33 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.34 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 28</td>
<td>already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.</td>
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<td>2.36 As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted within the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.</td>
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<td>Other Matters</td>
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Other Matters

2.37 The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.

The Inclusion of C2 (Residential Institution Uses) within the Council’s Housing Land Supply ID: 3-037-20150320 of the PPG allows C2 units to contribute towards a Council’s housing supply where the approach to such uses is clearly set out in an adopted Local Plan. In this respect we refer to paragraph 9.85 of the 2014 Oxfordshire SHMA that states:

'The growing older population will however likely lead to some increase in requirements for specialist housing solutions. The analysis above suggests a 98% growth in older population with dementia, and an 82% increase in the older population with mobility problems. From a planning point of view, some of these people will require specialist housing such as sheltered or extra care provision. Increasing numbers of older people with health problems will also require jointworking between housing and health (Council and NHS). The SHMA analysis indicates a potential need for between 280-450 additional housing units to be specialist accommodation across the County to meet the needs of the older person population each year moving to 2031. (Paragraph 9.85) (Our emphasis).
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<td>MM613</td>
<td>Empire Homes Limited</td>
<td>Brendan</td>
<td>Mr</td>
<td>O’Brien</td>
<td>1399</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>The SHMA is quite clear that specialist accommodation for older persons comprises an additional housing need as opposed to part of the baseline OAN. On this basis, C2 specialist residential uses should not be included within the Council’s housing land supply figures, unless the requirement is specifically amended to account for C2 uses. The Council’s position in this respect is therefore not justified and inconsistent with national guidance.</td>
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<td>MM491</td>
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<td>Crest Strategic Projects</td>
<td>1415</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>Empire Homes Limited object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and CA5 (MM134) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply. Land at Sunset View is under the control of Empire Homes Limited, is available now and capable of delivering around 41 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered. These representations provide information on the Land at Sunset View, Carterton, and should be read in conjunction with Edgars Limited’s representations regarding housing supply which are not repeated here.</td>
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Main 29: Paragraphs 5.34b-5.34d

3.45 The Council acknowledges that there is a national imperative to boost housing supply significantly through the preparation of proactive and aspirational Local Plans; however it seeks to temper this ambition by questioning the realism of addressing the existing Plan period backlog that has built up since 2011. The Council quantifies the backlog (2011-2016) as 1,836 dwellings and in light of the scale of the shortfall proposes to adopt the ‘Liverpool’ method of addressing it over the whole of the remaining Plan period, rather than the NPPG18 preferred ‘Sedgefield’ approach. Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’.

3.46 In seeking to justify this approach the Council notes that over 1,000 dwellings per annum would need to be built consistently over the next five year period, and implies that the housebuilding industry could not deliver this scale of growth. Furthermore, it is claimed that there are not enough sites that the Council considers to be suitable that can be released to address this need. This is not considered to be supported by the evidence base that the Council relies upon.

3.47 By way of illustration it is reasonable to reconsider (in the context of the Council’s approach to allocations proposed under the Local Plan modifications) the assessment of sites at Carterton via the original and amended SA. Carterton is chosen on the basis it is a Main Service Centre yet receives no strategic allocations for housing, and is curiously assigned no additional housing growth in response to the uplift in the housing requirement to meet the District’s needs.

3.48 The SA as a whole considers three potential strategic development areas at Carterton: North Carterton...
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1446</td>
<td>&gt; SECTION 5 - PROVIDING NEW</td>
<td>(Kilkenny Farm) (up to 1,000 dwellings), West Carterton (1,000 dwellings) and North East Carterton (1,200 dwellings), the latter being assessed at the modifications stage via the 2016 SA Addendum. The SA Addendum19 concludes that the findings in respect of the North and West Carterton options remain valid and so are carried forward as part of the evidence base, while the North East option is new and so is assessed within Appendix IV.</td>
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3.49 In the cases of the North and West options an identical concluding paragraph formed part of the assessment of each site at Table 4.1820:

As such and on balance it is not considered that the site should be allocated at the current time in order to meet the proposed Local Plan housing target (10,500 dwellings). If however the proposed Local Plan housing requirement is increased, or if further sites need to be identified in order to accommodate an element of unmet housing need from another local authority (e.g. Oxford City) this option may need to be reconsidered along with other potential alternatives.

3.50 The principal objection to each option set out within the SA is the potential impact of development on the landscape (Criterion 14), with each being assigned a minor negative/uncertain significance of effect rating. In each case therefore the grading identifies potential sustainability issues, which are capable of being mitigated. Indeed the summary comparative appraisal table within the February 2015 SA (p.86/105) states that the evidence suggests that the landscape can accommodate the proposed level of development at the North and West Options.

3.51 In the case of the North East Option the site performs very similarly21 to both North and West options and what is notable in each case is that there are no absolute constraints/major negative impacts. The only unqualified minor negative effect that arises in respect of each site occurs under criterion 7 (Improve land use efficiency), which is applied because they are green field sites. Other (limited) minor negative effects are uncertain.

3.52 The assessment table demonstrates very clearly that in each case there are no constraints to development on any of the site options at Carterton, consequently it is unreasonable and misleading of the Council to state that there are insufficient additional sites available for allocation. Indeed a comparison of the Carterton options with the Land East of Woodstock (300 dwellings) and the other draft allocations at the town22 (Appendix 4), shows that there are remarkable similarities in the ratings applied to each site under each criterion, yet very different outcomes.

3.53 What is most stark and seemingly perverse is that under criterion 14 the perceived impact on heritage/historic environment for all of the option sites identified at Carterton and the sites proposed for allocation at Woodstock is classified as the same. This is despite the proximity of the conservation area, multiple listed buildings (across all grades) and the WHS affecting the Woodstock sites, while at Carterton there are no such designations and no development within the setting of any listed buildings. The approach to assessment does not bear scrutiny (refer to Orion Heritage – Review of Heritage Considerations) the West Oxfordshire DC Local Plan Evidence Base: December 2016). In the case of landscape the East of Woodstock site would have a minor negative effect on landscape, compared to minor negative/uncertain for the Carterton sites, which suggests that the effect in Woodstock could conceivably be worse. The evidence base, once again does not support the approach taken in the Plan.

CPRE supports the use of the Liverpool method for determining a 5 year supply outlined in Liverpool v Sedgefield
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<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1449</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>Windfalls CPRE considers that a total windfall allowance of 1,380 in clause 5.34a, is modest and could be increased and suggests a re-look at recent permissions, which will be indicative of windfall potential. CPRE does not consider that it is necessary to exclude any further windfall over the next five years to avoid double counting. The small developments upon which the windfall target relies are normally completed quickly after permission is granted. A two year lag should be sufficient, leaving 13 years left in the Plan Period during which windfall can accrue. Affordable housing</td>
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<tr>
<td>MM719</td>
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<td>-</td>
<td>Empire Homes Limited</td>
<td>1620</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>INTRODUCTION AND SUMMARY i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Empire Homes Limited who have land north of the A44 and south of the Banbury Road, Chipping Norton under their control. The land extends to approximately 42 hectares and is identified on the plan attached as Appendix 1 to these representations. ii. Empire Homes Limited object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30), CN1 (MM140) and CN2 (MM143) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy. iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only 2.7 year supply can be demonstrated. Edgars consider that additional sites are required to be allocated to ensure sufficient housing land supply. iv. Land north of the A44 and south of the Banbury Road, Chipping Norton is available and capable of delivering residential development in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered. v. The following representations provide further information on the land north of the A44 and south of the Banbury Road, Chipping Norton. 1.0 DELIVERY AT EAST CHIPPING NORTON SDA (Policy CN1, MM138-MM140) 1.1 The East Chipping Norton allocation has been increased from about 600 dwellings at Tank Farm south of the London Road to 1,400 dwellings including 1,200 dwellings south of London Road and 200 north of London Road. The SDA now includes the provision of an Eastern Link Road. 1.2 Limited evidence has been published to demonstrate and assess the impacts of the increased allocation. The previous assessment of Strategic Site Options (Examination Document Ref OTH1) has not been updated. This provides a comprehensive overview of the site and a summary of the site constraints and impacts.</td>
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1.3 There would appear to be no evidence document which provides a summary of the modified East Chipping Norton SDA and its constraints. The SHELAA assesses a number of component sites but there is no expression of the overall size of the site and its developable area to ascertain whether delivery is realistic.

1.4 Previous landscape evidence was prepared for the Council by Kirkham Landscape Planning, the Landscaper and Visual Review of Chipping Norton Strategic Site Option (May 2014, Examination Document Ref LAN2). This concludes an indicative housing capacity for the land south of London Road of 500 dwellings within a similar area as now proposed by the Council.

1.5 This is significantly lower than the 1,200 dwellings now assumed by the Council and draws into question the deliverability of this number of dwellings.

1.6 Furthermore, it is noted that the East Chipping Norton SDA now also includes the provision of a link road through the allotment garden land.

1.7 The updated Infrastructure Delivery Plan 2016 does not provide a cost estimate for the provision of the link road. It is unclear what has been assumed for viability purposes.

1.8 Edgars Limited understand that the allotment land is under the ownership of Chipping Norton Town Council who object to the provision of the link road. This draws into question the deliverability of the eastern link road which is now integral to the modified East Chipping Norton allocation.

1.9 In Edgars opinion, the increased allocation at East Chipping Norton is not justified by the published evidence and there is a significant risk that it will not be realised.

1.10 Empire Homes Limited object to Policies H1 (MM24), H2 (MM29 and MM30), CN1 (MM140) and CN2 (MM143) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and contend that Land north of the A44 and south of the Banbury Road, Chipping Norton should be allocated to assist with the delivery of the East Chipping Norton SDA.

One of the most important components of the National Planning Policy Framework is the need ‘to boost significantly the supply of housing,’ (para 47). The Council acknowledge that it has a backlog of housing ‘under-supply’ which totals 1,836 homes in the period 2011 - 2016. The Council also acknowledges that the additional allocations under the main modifications are not sufficient to address this backlog over the next five years, and justifies this by stating that: ‘Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to deliver a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for housing.’

The fact that they are judged to be unsuitable does not mean that they are unsuitable as the Council argued that this applied to the land south of Witney Road which was granted planning permission on appeal in July 2016 (Ref: APP/D3125/W/15/3129767). It is therefore considered that the land on the north side of Witney Road, which has similar characteristics is also suitable for allocation. The fact that the Council acknowledges that the shortfall will not be made up over the next five years, indicates that if deliverable sites are available they should be allocated.
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2.21 We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.

Sources of Supply

2.22 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED)

2.23 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period.

2.24 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

2.25 The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

2.26 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

"With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

2.27 The NPPG is clear in its guidance to LPAs (D3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.28 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:
"To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified."

2.29 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.30 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.31 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.32 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

2.33 In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

2.34 As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be
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“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

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| MM728        | Abbey Developments and David Wilson Homes Southern | -                | 1668       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 29 | already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.  

2.33 In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.  

2.34 As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted in the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.  

Other Matters  

2.35 The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.  

Five Year Housing Land Supply  

Despite the increase in the overall level of housing provision set out in the Proposed Modifications (as discussed above), the Local Plan will still fail to “boost significantly” the supply of housing in the short term and therefore make a meaningful contribution to the Government’s national objective of delivering one million new homes by 2020.  

A significant shortfall in housing provision has already arisen within the first five years of the Local Plan period (2011-2016) which is further increasing unmet need. The Council assert that the residual Liverpool method is most appropriate to address the 1,836-dwelling backlog (excluding Oxford City unmet need) from 2011-2016 rather than Sedgefield which is recognised in Planning Practice Guidance (PPG).  

MAIN29 (paragraph 5.34b) indicates that the Council will apply the Liverpool method in calculating the 5-year housing land supply which seeks to address the under-supply over the plan period rather than the immediate 5-year period. IN016 (The Inspectors Preliminary Findings - Part 2 para 2.15) stated that WODC need to have regard for National Guidance as the Liverpool method is not mentioned. Furthermore, a Houses of Parliament Briefing Paper dated 25 May 20162 states that Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period, thus the Sedgefield approach should be adopted. This is especially important given the severeshortfall of 1,836 homes and the serious affordability concerns in the local area (house prices 10 times lowest incomes).  

The Sedgefield approach would facilitate the back-log of supply to be addressed within the first five years of the plan rather than stretching the unmet need over the plan period. Planning Practice Guidance (PPG)3 states that Local Authorities should aim to deal with any undersupply within the first five years of the plan where possible. The Inspector as detailed in IN016 comments that WODCdo need to have regard for
National Policy on this matter, and that the Liverpool method is not mentioned, concluding that Sedgefield is preferred. With the very poor delivery against the district’s revised housing target (with a 2% year deficit at April 2016), there should be a consideration of whether the 20% buffer now applies.

Specifically, in relation to Witney, we note that the Council relies heavily on the West Witney site which has had a resolution to grant outline planning permission since March 2013 (now over 3½ years ago). Furthermore, a non-strategic allocation at Woodford Way Car Park is acknowledged by the Council as undeliverable in the short term. It is still considered that WODC should adopt the Sedgefield method and address housing need in the short term and seek to allocate sites which can deliver in the short term. The Council attempts to justify its approach in MAIN29 (paragraph 5.34c) with reference to the capability of the development industry, including past performance within the district, and in terms of capacity in terms of housing land availability. However, this disregards the significant opportunity for to bring forward development at South Witney in the short term. The Council’s rejection of allocating additional deliverable sites in unconstrained locations such as Witney means that the authority is artificially constraining the supply and therefore limited choice and competition in the market, contrary to paragraph 47 of the NPPF. The way to address this will be to front load the Local Plan with a range of development sites, as opposed to simply increasing the capacity of previously identified SDAs, which would increase delivery within the first half of the plan period and in particular within the 5-year supply period. Additionally, whilst paragraph 5.34c is dismissive of the development industry’s capability to deliver at over 1,000 dwellings annually, the current strategy of the authority expects this to occur between 2021 and 2031 (based upon 660 SHMA annual need + 275 dwellings annually for Oxford un-net need + a proportion of continuing unmet district need through application of Liverpool method). Consequently, there is no justification for delaying delivery of housing in West Oxfordshire post 2021 and the authority should consider all opportunities for early delivery such as around Witney.

Furthermore, the Council’s Housing Land Supply Position Statement October 2016 simply indicates that Eynsham will ‘kick in’ from 2021 onwards as ‘agreed’ through the joint work at the Growth Board: such a view is not supported by the following statement from the September 2016 OGB report which emphasises the sovereign nature of Local Plans in identifying land to address unmet need: “133) The Programme is not seeking to allocate or release sites, but has at a high level and using a common basis, through the work streams; identify the evidence of each district’s ability to absorb additional growth to meet a share of Oxford’s unmet need. It will be for each of the districts through their normal Local Plan processes to allocate sites sufficient to meet their proposed share of Oxford’s unmet need under the requirements of the Duty to Co-operate. It is also important to note that the yield figures for each area of search represent estimated housing numbers to be delivered by 2031 - total capacities at a number of these sites may change through local assessment as part of the more detailed Local Plan process, taking a wider range of planning factors into account, including the potential to deliver further housing beyond 2031.”

Rather than the response to delivering new homes to meet unmet needs ‘kicking in’ in 2021, this should be seen as ‘kicking the can’ down the road. Unmet need, is, by definition, unmet, especially as the City has delivered less than 20% of its SHMA requirements between 2011 and 2016. This is in marked contrast to the Inspector’s preliminary findings that it was his initial view that unmet Oxford City need would need to be taken into account in calculating the 5-year land supply (Paragraph 7.6 (IN015)).

It is counter intuitive for the Council to hold the view that need for housing in the City since 2011 should be addressed in 5 years’ time or beyond. The Inspector’s Preliminary Findings (IN015) confirmed that if the Council failed to consider the implications of unmet housing needs the plan would be
out of date before it can be adopted. The inescapable conclusion to this is that unmet housing needs should begin to be addressed at the time of adoption of this plan: arguably now. Were that not the case, logically an early review which gives time to consider and then respond to unmet needs would be appropriate, which it is evidently not.

**Affordable Housing Need**

We note that the Council’s Strategic Development Area (SDA) Viability Update (2016) provides appraisals for the SDAs proposed in the Local Plan. The appraisals including for North Witney and East Witney appear to suggest that of the 40% affordable housing to be provided, 20% (i.e. 50% of the total affordable housing provision) is assumed to comprise Starter Homes.

The approach to Starter Homes including the extent to which this helps to meet affordable housing needs is expected to be clarified through the Housing White Paper which the Government is due to publish in January 2017. This could potentially call into question the Council’s viability assessment and place further doubt on the deliverability of these sites.

Furthermore, it is unclear from the Viability Update what assumptions have been made regarding financial contributions towards strategic highways infrastructure which both North Witney and East Witney are reliant upon. In the absence of further detail, this could potentially lead to further reductions in meeting the affordable housing need in the area.

**MM734 vanderbilt Homes Vanderbilt Homes**

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<td>Object MAIN 29 - paras.5.34b, c, &amp; d - 5 year housing land supply statement</td>
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Object MAIN 29 - paras. 5.34b & 5.34c - use of 'Liverpool' method Council's agreed position in relation to Long Hanborough Station Inquiry At a current appeal at Land Adjacent to Hanborough Station, Long Hanborough (application ref. 15/03797/0UT and appeal ref. APP/D31/25/w/16/3148400) the Council have set out their current position in respect of a 5 year housing land supply, agreed within the Statement of Common Ground.

In summary, the position is as follows:

- Requirement 2016-2021 - 6,836
- Supply - 4,514
- Shortfall - 2,322
- Years supply - 3.3yrs

As of 11 November 2016, the Council do not have a 5 year housing land supply. A 3.3 year housing land supply is the current position. Council's Approach to Meeting Housing Need The Council's approach to meeting its housing need requirement relies on a combination of large existing commitments, small existing commitments and draft local plan housing allocations. We have concerns in relation to the first and last of these elements.

In relation to existing large commitments, judgements have been made by the Council in their Housing Land...
Position Statement over the timeframe for deliverability of certain sites; particularly within the current five year period ending March 2021. We have significant reservations about the assumptions that have been made in respect of a number of sites including West Witney, land east of Carterton and east of Chipping Norton SDA, where collectively the Council suggest 850 dwellings will be delivered by 2021.

The Council’s reliance on these sites delivering the number of dwellings suggested is, in our opinion, unsound given the background to the sites concerned and the various deliverability issues. For example, the West Witney commitment has had considerable delays to the outline planning application and the Section 106 Agreement still has not been signed. There are major infrastructure requirements to address and to suggest that 350 dwellings will be delivered in the next 4.5 years is unrealistic.

The reliance on the deliverability of ‘existing commitments’ during the current five year period has the effect of distorting the Council’s land supply position as well as rendering the proposed modifications to the Local Plan unsound. With regard to reliance on draft Local Plan Housing Allocations, Paragraph 5.13 of the Council’s Housing Land Supply Position Statement (Oct 2016) outlines that the Council, in response to the Inspector’s concerns with how a significant increase in the overall housing requirement for the District will be delivered, have included a number of new site allocations.

Para 5.14 continues:

“Whilst these allocations remain in draft form at the present time and are subject to further consultation and discussion through the reconvened Local Plan examination it is reasonable to expect some additional housing supply from these sites in the period 2016 - 2021.”

In seeking to demonstrate a 5 year housing land supply and meet the challenge of providing the requisite homes in the District, the Council have produced a series of allocated sites.

The Council acknowledge they are draft and subject to further consultation and examination. In total, across the District, the non-strategic housing allocations total 1,719 (new para. 5.30b), or around 10% of the total provision for the plan period.

Taking together all proposed draft Local Plan housing allocations, strategic development areas and non-strategic allocations, this figure is 8,169 dwellings (including 2,750 dwellings for Oxford’s unmet housing needs).

The Council acknowledge that “it is reasonable to expect some additional housing supply from these sites in the period 2016 - 2021”, but does not expand on this claim any further. These are newly introduced sites which are only now undergoing public consultation and have not been subject to independent examination.

Given the nature of the modifications and the scope of what is proposed, it is likely there will be significant unresolved objections to the proposed site allocations. The Inspector may wish to recommend changes to the Plan once each site has been considered on its merits. These sites have not yet been properly assessed. The allocations are at a very early stage of the plan-making process, undergoing the first stage of public consultation at the time of writing.

Paragraph 216 of the NPPF is explicit in setting out the degree of weight which should be given to relevant policies in emerging plans. Little weight should be afforded to these emerging policies.
Issuing a series of main modifications to a plan for public consultation which propose a series of draft site allocations for the first time is not an appropriate mechanism on which to rely on for the purposes of adopting planning policies relating to housing deliverability.

The Council acknowledge that the “allocations remain in draft form” and will be “subject to further consultation and discussion through the reconvened Local Plan examination”. 'Site Allocations' documents are commonly separate, detailed, stand-alone Development Plan Documents in their own right. They would undergo consultation and various drafts leading up to independent examination as they are adopted. Indeed, paragraph 5.30c the Plan states that “Subject to resources, the Council will seek to prepare site-specific planning briefs to guide the development of these allocated sites” (our emphasis).

The Council acknowledge that further work - including formal public consultation - will be undertaken in the future to understand the capacity and potential for housing delivery on these sites.

However, the Council have instead assumed each site will come forward and will deliver the level of housing stipulated by the proposed modifications, and have prepared policies on this basis.

Furthermore, paragraphs 5.34b and 5.34c discuss the Council’s approach to calculating supply using the ‘Liverpool’ method. We do not consider this approach appropriate. There is a persistent past undersupply of housing delivery within the District which needs to be addressed now, and not spread out over the Plan period, and for this reason in this instance the ‘Sedgefield’ method is the most appropriate basis to address the shortfall.

The Council have made a series of assumptions in reaching the conclusion that the proposed main modifications to the Local Plan will meet the revised housing target for the District. It is circular reasoning to produce draft modifications for consultation yet to assume the requisite levels of housing delivery will be achieved, and it is for this reason we consider the Plan unsound.

Ultimately, we do not share the view that a 5 year housing land supply has been satisfactorily demonstrated, and it is not an appropriate basis on which to operate for decision-making purposes.

1. It is not justified: a series of main modifications - which is in effect the first stage of public consultation on 8,169 homes on strategic and non-strategic allocated sites – is not an appropriate strategy on which to assume the District’s housing shortfall will be delivered, and to produce amended policy which flows from this assumption.

In summary, we are of the view the Plan is unsound because:

2. It is not effective: by its nature, due to the very early stage of consultation on these site allocations we do not know which sites will be deliverable and can be expected to contribute towards the District’s housing supply. It can reasonably be assumed there will be objections to these allocations, and some of them will not come forward for delivery, or may come forward but at a reduced capacity.

3. It is not consistent with the NPPF. The weight which can be afforded to these emerging policies at this early stage of consultation is not consistent with the Council’s position that they can demonstrate a 5-year housing land supply and determine planning applications on this basis.

Strong objections are raised in respect of Paragraph 5.34B of the Plan and the intention to apply the Liverpool approach to dealing with backlog the of 1,836 homes.
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<td>i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited (Edgars) on behalf of the owners of land adjoining the north west side of 34 Churchill Road, Chipping Norton. The land comprises approximately 4.5ha and is identified on the plan attached as Appendix 1 to these representations.</td>
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<td>ii. The owners object to Policies H1 (Main Modification (MM) 24), H2 (MM29 and MM30) and CN2 (MM143) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.</td>
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<td>iii. Edgars have prepared representations on behalf of several clients which demonstrate that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure a sufficient housing land supply.</td>
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<td>iv. Land at 34 Churchill Road and adjoining land to the north west is under the control of one family. It is available now and can deliver around 75 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified</td>
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WOLP 2031 is delivered.

v. The following representations provide further information on the site at Churchill Road and should be read in conjunction with Edgars' general representations regarding housing supply which are not repeated here.

1.0 LAND NORTH WEST OF 34 CHURCHILL ROAD, CHIPPING NORTON

1.1 Our clients object to Policies H1 (Main Modification (MM) 24), H2 (MM29 and MM30) and CN2 (MM143) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that land at 34 Churchill Road and adjoining land to the north west should be allocated for around 75 homes to help address this deficiency.

Site and Surrounding Area

1.2 The site is situated in the south western part of Chipping Norton, which is the third largest town in the district offering both residents and visitors a good range of services and facilities. The site lies approximately 700m from the town centre and is a similar distance from Chipping Norton Leisure Centre and Chipping Norton School (secondary). There are bus stops located on Churchill Road (within 150m of No. 34 Churchill Road), which provide access to a high frequency service to Oxford (S3) and a slightly less frequent service to Banbury (488). There is also a service (X8) that links Chipping Norton with Kingham Railway Station. The site is therefore in a highly sustainable location.

1.3 The site comprises approximately 4.5 hectares of land, identified on the plan attached at Appendix 1. The land forms part of the side of a valley and slopes downwards from the south east to the north west of the site. There is a two story dwellinghouse at 34 Churchill Road with vehicular access and egress to the front of the property via dropped kerbs in two locations. Access to the land at the rear (north west) of 34 Churchill Road is via an agricultural gate and grassed track situated between numbers 34 and 32 Churchill Road. The land north west of 34 Churchill Road is not currently actively used for agriculture, except for occasional grazing. Consequently, it could be described as unmanaged grassland, declining in quality. This land is divided into two parts, almost equal in area, by a tree-lined stream which runs from the site's southernmost corner to its northernmost corner. The trees along this line are substantial and mature and are effective as a visual barrier.

1.4 The principal north-eastern and south-eastern site boundaries are shared with residential properties at The Leys and Lords Piece Road respectively. The rear gardens which back onto the site include considerable tree cover in the more historic environment of The Leys. There is less tree cover in the 20th century residential development at Lords Piece Road which forms the more elevated backdrop to the site. There is a small group of industrial buildings, with a high number of trees in the curtilages, immediately adjacent to the site's northwestern boundary along the route of a former railway line in the floor of the valley. The group contains some relatively modern structures, which are unremarkable, but among them sits Bliss Mill. This is an imposing 19th century building (now converted to apartments), Grade II* listed and a notable local landmark. Beyond the industrial buildings lies the Chipping Norton Regulated Pastures, which is common land with open public access for recreation. Open countryside lies to the south west of the site.

1.5 The site falls within the Cotswolds Area of Outstanding Natural Beauty, the Chipping Norton Conservation Area and the setting of the listed building (Bliss Mill).
1.6 The ‘Cotswolds AONB Landscape Strategy and Guidelines’ (adopted in June 2016) states in relation to the Vale of Moreton Farmed Slopes Character Area (in which the site is situated) that the expansion of existing settlements onto the Farmed Slopes is regarded as a local force for change, with a range of potential landscape implications including the ‘encroachment of built development onto the Farmed slopes intruding into the landscape, particularly on the more prominent upper slopes’.

1.7 It is to be noted in this instance that the site does not occupy the uppermost slopes. The existing substantial tree cover, both on the perimeter and a belt running through the site, makes the land less visually prominent than the common land to the north west and the open countryside to the south west.

1.8 The Chipping Norton Conservation Area Character Appraisal identifies the bowl-shaped valley landscape setting of Bliss Mill as the most significant area of open space in the Conservation Area. While it is envisaged that within the Conservation Area the existing buildings, land uses, historic settlement patterns and open spaces should remain largely undisturbed, the guidance does enable development where views into and out of Chipping Norton, as well as views within Chipping Norton, are not harmed and where existing features of historic, visual or natural importance, such as trees, hedgerows, ponds, stone walls, paths and tracks are incorporated.

1.9 The site is not within an area that is at risk from flooding.

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation, December 2016.

1.10 The site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELAA).

Key Planning Site Considerations

1.11 Additional technical work, including a Landscape and Visual Impact Assessment is currently being undertaken and likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as relevant to the potential allocation of the site.

The principle of housing development at Chipping Norton

1.12 Chipping Norton is identified as a Main Service Centre in the Local Plan 2031. Draft WOLP Policy H2 permits new housing on undeveloped land adjoining the built-up area to meet identified housing needs. As such housing development on the site would be acceptable in principle.

1.13 Draft Policies H2 and CN2 seek to secure the delivery of 2,400 new homes focused on Chipping Norton. Delivery is proposed partly through a strategic mixed used development area of around 1,400 dwellings on the eastern side of Chipping Norton. The provision of an eastern link road is an integral part of the proposed Strategic Development Area (SDA).

1.14 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which is likely to result in continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead times of SDAs, addressing the current supply deficiencies is best achieved through allocating...
1.15 In Edgar's opinion, the development of land at 34 Churchill Road and adjoining land to the north west can comply with Policy H2 in being adjacent to the built up area of a Main Service Centre in the settlement hierarchy, settlement character, AONB landscape and Conservation Area.

1.16 Draft Policy OS2Locating Development in the Right Places states that a significant proportion of new homes, jobs and supporting services will be

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation, December 2016 focused within and on the edge of the main service centres of Witney, Carterton and Chipping Norton. Development is required to:

- form a logical complement to the existing scale and pattern of development and/or the character of the area;
- be compatible with adjoining uses and not have a harmful impact on the amenity of existing occupants;
- as far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s;
- be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities; and
- conserve and enhance the natural, historic and built environment.

1.17 The site is surrounded on three sides by existing residential and industrial development. It is considered that allocating the site for housing would form a logical extension of the existing built-up area, without encroaching on the more visually prominent parts of the valley that would otherwise cause harm to the setting of Bliss Mill.

1.18 Use of the land for housing is entirely compatible with the adjoining residential development at The Leys and Lords Piece Road. The retention of existing trees and hedgerows, especially on the perimeter of the site, will help to ensure that there is no harmful impact on the amenity of the existing occupiers of properties in these two roads. It will also help to preserve and enhance the character and appearance of the conservation area.

1.19 A new all-purpose access road is capable of being provided off Churchill Road following demolition of the existing dwelling at No. 34. A 6.0m wide access road with 9.0m radii (like the Lords Piece Road/Churchill Road junction) with 2.0m wide footways each side would be constructed. Junction visibility splays of 2.4m x 43m are readily available in accordance with the 30mph speed limit on Churchill Road. An offset distance of 20m (centreline to centreline) would be provided between the new access and the cul-de-sac on the opposite side of Churchill Road, named Edward Stone Rise. This specification would facilitate a development of up to 150 dwellings. However, having regard to the importance and sensitivity of the landscape, the character and appearance of the Conservation Area and the setting of the listed building, it is considered that around 75 dwellings would represent a more appropriate scale of development for this site.

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton.
1.20 If the total number of dwellings on the site generated a need for a separate emergency access, this could be achieved by utilising existing rights of access to the gate in the northern corner of the site, from The Leys/Station Road. It would also provide an additional means of access for pedestrians and cyclists. In this manner, the development would be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities.

1.21 The character and appearance of the AONB and the Conservation Area can be preserved and enhanced through a high quality evidence based development within a strong and extensive landscape framework. While the extent of the land is 4.5ha, around 75 dwellings are proposed leaving significant scope for open space and landscaping.

1.22 In Edgars opinion, a development of this scale does not comprise ‘major’ development for the purposes of NPPF paragraph 116 and that a development within a strong landscape framework will not have a significant adverse impact on the landscape and scenic beauty of the wider AONB. The public benefits of the scheme would outweigh any harm to the Conservation Area and the setting of Bliss Mill.

1.23 Although further work is being undertaken, Edgars consider that development can be achieved on the site which makes an important contribution to meeting housing land supply in a sustainable location, without significant impact on the settlement character, AONB or the Conservation Area.

1.24 Further detailed technical information is likely to be available during the next stages of the WOLP 2031 Examination.
housing;

-- the ongoing reliance on a 5% rather than a 20% buffer to facilitate delivery;

-- the lack of evidence to support the Council's estimates of supply on allocated, permitted and other potential housing sites.

In this circumstance, Hallam consider that it is important for the Local Plan to make additional allocations to realistically help ensure that the housing required to meet needs is delivered.

The allocations in the Plan do not achieve this objective (irrespective of their individual merits and suitability which, in Hallam’s view, also means that further allocations should be made).

In the following paragraphs, a summary of Hallam’s concerns regarding the deliverability of the Plan’s housing objectives is set out. Hallam would look to substantiate those views at the forthcoming resumption of the Examination.

Sedgefield v Liverpool approach.

In Main modification 29 and 30 the Councils sets out a new approach - which is to adopt the Liverpool method for assessing five year supply.

While no detailed consideration was given to this issue in the first session of the Examination, paragraph 2.15 of the IN016 (the Inspector's Preliminary Findings Part II) warns the Council that it should have particular regard to National Guidance on this matter, as the “Liverpool Method” is not mentioned”.

The Council have consistently used the Sedgefield approach to address the housing shortfall whereby the backlog of housing is met in the first five years of the plan period. The October Housing Land Supply Position Statement however sets out that the Council now believe that the Liverpool method is the most appropriate way of addressing the shortfall – over the plan period as a whole. MAIN 29 inserts text into the draft Local Plan that seeks to explain that the Liverpool method would place strain on the delivery of housing, meaning that in excess of 1,000 homes would need to be built in the first 5 years. MAIN 29 states that the Sedgefield approach ‘could only be achieved through by releasing a large number of sites that have been assessed by the Council as unsuitable for new housing’. This comment is not considered to be a valid reason for employing the Liverpool method as it is predicated on the Council having not allocated enough sites for housing rather than there being sites in the pipeline. There are clearly additional and sustainable opportunities that could come forward and help meet identified housing needs.

It is the Sedgefield method that is more with the NPPF, and paragraph 47 in particular which states that the shortfall should be moved forward from later in the plan period. The Planning Practice Guidance is clear. Paragraph Reference ID: 3-035-20140306 considers “How should local planning authorities deal with past under-supply?” The short answer given in the Planning Practice guidance is that: “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Co-operate”

The Guidance does not suggest an alternative to the Sedgefield approach. If the scale of the shortfall can’t be met within the first five years of the Plan then the solution is not to abandon the Sedgefield approach – or
the attempt to meet needs that are urgent but to meet such needs as is possible and also to look to work with neighbouring authorities through the “Duty to cooperate”. This is not proposed by the Local Planning Authority.

It can make no sense to plan to meet housing needs that are assessed as having arisen between 2011 and 2016, and that haven’t been addressed in that period, at some undetermined point in the future - say 2026 - 2031. Deferring meeting needs is not consistent with the NPPF.

The Sedgefield approach is entirely consistent with the urgency stressed in the NPPF in relation to meeting housing needs because it seeks to ensure housing is provided as quickly as possible. It is unsurprisingly that appeal decisions have consistently employed the Sedgefield approach.

The fact that the Council has consistently applied the Sedgefield method, and this approach has been endorsed by Inspectors at recent appeals in the district (Burford Road, Witney), further illustrates the Council’s change of position as ill-judged. The October 2016 Housing Land Supply Position Statement sets out that the ‘validity of this approach will be debated through the Local Plan process’ however as it currently stands, the Council have provided no substantive justification for this approach. The Sedgefield remains the most appropriate method for addressing the shortfall, and given the significant shortfall and under delivery, the Council should accept this position rather than causing unnecessary delay to the delivery of much needed homes by not allocating enough sites to deliver the shortfall in the first 5 years. Adopting the Sedgefield approach, the Council accepts that it does not have enough land identified to meet housing requirements. This is not an acceptable approach given the scale of housing need and the large shortfall in meeting urgent housing needs.

5% v 20% buffer

The issue of the appropriateness of a 5% buffer was considered by the Local Plan Inspector in his preliminary findings in December 2015 (IN016). The conclusions were that delivery had been well below the local plan in recent years but that “it would not be reasonable to conclude, at present, that there had been persistent under-delivery”. This was because recent under delivery was partly excused by over delivery in the preceding 5 years against the South East Plan (and notwithstanding the limited provision that was sought in the SEP).

The Local Plan Inspector’s conclusions were both preliminary, and related to that point in time. Specifically, the Inspector pointed to circumstances where a 5% buffer should not be applied:

- “If delivery continues to be below that which is required, future decision makers may take a different view”;
- “the Council would be in a more robust position going forward if the plan creates a 5 year supply with more than a 5% buffer”.

Subsequently, Inspectors reaching decisions in respect of housing land supply in West Oxfordshire have opted to employ a 5% buffer.

Equally decisions have built on the WOLP Inspector’s conclusions by cross referring to the “tipping point implied in the Inspectors report” (when the adoption of a 20% buffer becomes appropriate).

With the publication of the Housing Land Supply Position Statement in October 2016 matters have now
progressed further. The data profile has moved on six months and been confirmed. The completion of just 246 dwellings in 2015/16 represents another year of very substantial under delivery - since the Inspectors initial conclusions. Moreover in the Main Modifications a new housing trajectory is proposed. Still no more than 515 dwellings are anticipated by the Council in the present year (2016-17) (NEF/App 12). The Council on its own figures therefore anticipates at least another year of under delivery.

In the light of this most recent evidence, and the sheer scale of the shortfall in delivery in the Local Plan period it would seem appropriate to reconsider the need to adopt a 20% buffer for the assessment of housing land supply and the plan period. By so doing, a robust approach can be adopted which will increase the options and choice for housing land to address the substantial under-delivery, and to reduce the risk of further shortfalls in delivery in the future. As it stands the Plan makes no provision for resilience.

Housing Supply

In its Housing Land Supply Position Statement (October 2016) the Council has comprehensively updated its estimate of the sites and other sources of supply that it considers will contribute towards meeting the need for housing in the five year period from 1 April 2016.

This responds to the expectation in Planning Practice Guidance that "Local Planning Authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out").

In presenting updated information, the Council has taken the opportunity to reorganise its categorisation of its sources of supply. In so doing it is worth noting at the outset that the updating of the Council’s position has resulted in a limited increase in the Council’s estimate of available supply only. Hitherto the Council suggested that some 4,067 dwellings could be completed in a five-year period from 1 April 2015. The Council’s estimate has risen to 4,514 only, in setting out updated evidence to a 1st April 2016 base date.

At the same time - as outlined above - the Council has accepted a significant increase in its estimate of OAN and there has been a very substantial rise in the already considerable backlog or housing shortfall in the plan period.

Existing Commitments

In Appendix 1 of the Housing Land Supply Position Statement, the Council includes a schedule of 43 sites, all bar two of which are expected to deliver at least 10 dwellings in the period 1 April 2016 to 31 March 2021. Collectively, the Council expects some 2,740 dwellings to be delivered on these sites in that five-year period. A number of these sites I have reviewed in my evidence to date. Others are advanced by the Council for the first time.

For a variety of reasons that the Council continues to considerably overstate the likely completions in this category.

First, now relies on a number of sites that have been granted planning permission at a point beyond the base date for the assessment (1st April 2016). Specifically, such sites include a number permitted on appeal, and a few permitted by the authority, well beyond the base date of the five-year supply assessment, for instance:
One of the major concerns of adding sites “post hoc”, is that this results in a comparison between the claimed supply and the requirement that is a comparison of apples and pears. What the Council proposes is a comparison of the supply in October 2016 with the requirement on 1 April 2016. The Council’s comparison fails to take account of what will inevitably be a further increase in the backlog/shortfall between April and October 2016 as completions continue to lag substantially behind the requirement. This applied also to the small site commitments 94 of which were granted after 1 April 2016.

Second, a number of sites relate specifically to C2 uses - in the form of care homes and extra care. These include Sites 2 and 3 - Coral Springs, Witney (155 units), Site 22 - Penshurst School, Chipping Norton (93 units) and Site 32 - Freeland House (40 units)

Third, there are specific concerns regarding a number of sites. For instance while the Council has downplayed considerably its expectations of North Curbridge (West Witney) and while the Council’s Housing Land Supply Position Statement (October 2016), indicates that a full application for infrastructure has just been submitted and some pre reserved matters application activity has taken place, the position fundamentally remains the same - no permission has yet been issued with a section 106 agreement still to be signed. The slippage documented at the previous session of the Examination continues and extends. There is no certainty at the end of the day that it will be signed and completed, or when. As delay is built on delay, we are already six months into the five-year period from 1 April 2016. Even if the outline consent were to be issued now (and there is no evidence to suggest that it will be), infrastructure details have only just been submitted and there will be significant lead in time before commencement could begin on site. We consider that the Council’s estimate of 350 completions is highly optimistic.

Very similar circumstances prevail in relation to the land to the land east of Carterton 300 dwellings. A resolution to grant permission was obtained but this is now two years ago now. The Housing Land Position Statement October 2016 provides no significant update in relation to progress on the site. No further details appear to have been lodged. No evidence is provided of activity in moving the site forward. Reference to the site being in single ownership is made with the implied suggestion that this provides more certainty as to delivery. In reality, the site is controlled by a single developer - Bloor Homes - and the expectations of some 300 completions delivered on the site by 31 March 2021 - even if the section 106 were signed now are highly ambitious.

Draft Local Plan Allocations

The Council’s latest evidence of supply continues to rely substantially on emerging Local Plan sites to deliver a substantial proportion of the required completions in the five years from 1 April 2016. In total some 1,035 dwellings are anticipated on 11 different sites comprising 23% of the Councils estimate total five year supply of 4,514 dwellings.

This is similar in scale to the 1,000 dwellings anticipated in the Council’s previous Housing Land Supply:

-- Burford Road (Witney) (150 dwellings) - granted on appeal on 24 August 2016;

-- Land south of A4095 (Long Hanborough) (169 dwellings) - granted on appeal July 2016;

-- Eynsham Nursery (77 dwellings) - approved on appeal August 2016;

-- Land south of High Street (Milton under Wychwood) (62 dwellings) - approved on appeal July 2016.
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| Position (CD6.2). However, the composition of that supply has changed. Rather than some 1000 dwellings as previously assumed on four strategic sites - east of Chipping Norton, north of Witney, REEMA Central and east of Witney - the Council has now recognised that no more than 281 dwellings might be anticipated on these four sites (of which 200 are anticipated on the land to the east of Chipping Norton SDA and 81 on REEMA north and central).

The vulnerability of the delivery assumptions in respect of land east of Chipping Norton was addressed in the first part of the examination. The Council's latest Housing Land Supply Statement (October 2016) recognises that this is a "large strategic site with potentially large lead in time" (page 75). The hope canvassed by the Authority is that some parcels e.g. the Pillars and the former Parker Knowle site might be capable of early release and had been subject to pre-application approaches.

However, no application was indicated in the October 2016 Position Statement and in any event the capacity of any such applications remains far from clear. It would seem most unlikely to amount to the 200 dwellings that the Council anticipates on the site in the five-year period (now 4.25 years away).

In the suggested Main Modifications to the Local Plan, officers are suggesting to the Council that the SDA east of Chipping Norton is substantially recast. It is to increase in size from 600 dwellings to 1400 dwellings and to embrace land now to the north and the south of the London Road. This will have significant new implications for the delivery of housing within the SDA. In particular, the implementation of the SDA now (it did not before) requires a new "eastern link road connecting the Banbury Road to the A4026/A361 via the London Road". The ability to deliver that essential infrastructure depends on land ownership issues ("the proposed eastern link road is likely to need to be routed across land in the ownership of the Town Council much of which is in use as allotments as well as areas of community woodland") with delivery and/or the planning of the delivery of that infrastructure likely to impact significantly on the ability to commence any development on the site;

In all such circumstances, and in the absence of any clear evidence to the contrary, the prospect of resolving the substantial range of issues prior to the commencement of any development on site in order to allow 200 dwellings to be on site in 4.25 years’ time seems remote.

With the exception of Site 48 (REEMA) all the remaining sites where the Council now anticipates housing completions by 2021 are sites that have been newly identified in the suggested Main Modifications.

In addition to evidence of suitability, it is necessary for the Council to demonstrate that the site is deliverable and that the new homes anticipated to be completed within five years is achievable. No evidence is presented within the Housing Land Supply Position Statement October 2016 that this is the case. Generally, and simply, it is suggested that the location is highly desirable and that there is evidence of developer interest. The submission of an application would be a demonstration of potential achievability and availability in a five year period yet in many cases that does not exist.

We are already 6 months into the five-year period. In the absence of a planning application now, availability can’t readily be established. Further, in the absence of an application now, it is difficult to imagine that there is any certainty that significant completions might be achieved in the remainder of the five-year period.

Summary and Conclusions in respect of Housing Land Supply

Drawing together the conclusions in respect of housing land supply and delivery in the Local Plan it is
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<td>MM749</td>
<td>Home Builders Federation Ltd</td>
<td>Home Builders Federation Ltd Mr J Stevens</td>
<td>Mr Stevens</td>
<td>1826</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>apparent that the Plans provision is unlikely to ensure the delivery of housing to meet housing needs. Moreover the assumptions made in seeking to demonstrate such a position fail to provide flexibility or seek to take a positive stance- for example by adopting a 20% buffer. In the light of the conclusions this element of the plan does not appear effective, justified or positively prepared. Additional allocations would contribute toward securing the soundness of the plan.</td>
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<td>Home Builders Federation Ltd</td>
<td>Home Builders Federation Ltd Mr J Stevens</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>The Council’s overall windfall allowance for the remaining plan period is 1,380 dwellings. Only 30 windfalls are assumed for the first five year period for 2016-2021 to avoid double-counting of existing windfall permissions. Thereafter, the Council assumes 125 windfalls a year. The Council assumes, based on past-trends, the windfalls will come forward in the various sub-areas. Our main reservation is whether the ‘general principles’ articulated in Policy OS2 (MAIN 16) and Policy H2 will be conducive to enabling these windfalls to come forward in these sub-areas. In combination, these two policies impose a great many restrictions on residential development such that it may be very difficult for small and medium sized residential developments to come forward. Combined with the very low number of non-strategic allocations (paragraph 5.30a) we have some reservations about the likelihood of windfalls coming forward at the number expected. This could make it difficult for the Council to sustain delivery.</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>Five-year housing land supply We note that the number of completions has been low – 1,464. This means that there is an undersupply accrued since the base date of the Plan in 2011 of 1,836 homes. The Council has stated that it intends to deal with the backlog through the Liverpool approach. The HBF’s preference is that the shortfall should be addressed as quickly as possible, i.e. in the next five years by applying the Sedgefield approach so that the Council is not faced with an insuperable residual requirement in the last few years. We recognise that this could represent a challenge for the Council but equally we are concerned that one quarter of the life of the plan period has already elapsed so that the Council has 15 years left to deliver the overall requirement. On the plus side, West Oxfordshire is a popular housing market. We consider that delivery could be greatly assisted by increasing the number of non-strategic allocations in the villages, which currently number only 15 (paragraph 5.30a).</td>
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housing need and affordability.

The Inspector has endorsed the need to follow the Sedgefield approach, advising the Council of the need to have particular regard to National Guidance on the matter, as the 'Liverpool Method' is not mentioned (IN 016, para. 2.15). Moreover, he made it clear that the 5% buffer should be applied to the shortfall in delivery during the plan period to date. He also considered it would be prudent for the Plan to create a five year supply with a buffer in excess of 5% to allow for any unexpected delays on some sites, and which would therefore result in a more robust position for the Council going forward (para. 2.14).

It is therefore essential that the backlog is front-loaded and cleared within the first five years. The only alternative provided for in Government guidance is to work with neighbouring authorities to resolve it under the Duty to Cooperate. There is no evidence that the Council has attempted to do this.

Even if the Council is correct that the consequence of applying the Sedgefield Approach would be the release of sites considered to be unsuitable for new housing, boosting significantly housing delivery is an imperative to which very great weight is properly given in the planning process, and is likely to override the objections to the allocation of less preferred sites that can make an early contribution to increasing the delivery trajectory. In considering which sites to allocate, the elimination of the back-log in the first five years should therefore feature prominently in the allocation strategy. Since the Council has chosen not to follow this approach, it ensues that its allocation strategy is flawed and should be revisited. In particular, it is likely to require allocation of smaller sites in areas which are currently a lower focus for growth. Since, having regard to the table of Adjusted Supply set out above, the Council is likely to be required to make significant additional provision for housing land, it will afford the opportunity to distribute more growth to smaller settlements and sites in the northern part of the plan area, that have the potential to deliver housing at an early stage in the five year period following adoption of the Plan.

There is no justification for not including the needs arising from Oxford City Council in the five year supply. They are part of the overall requirement for the plan period, and their exclusion from the five year supply currently exacerbates the back-loading of the delivery trajectory and the consequential enhanced risks of undershooting the requirement.

There are again parallels between the current circumstances and those considered at the recent Plan Examination in North Somerset. In North Somerset the Council similarly argued that the 50% uplift in the housing requirement mid-way through the Plan period meant that the back-log should be spread over the plan period, not least having regard to the necessary elevation of delivery rates to unprecedented levels. The Examination Inspector held as follows:

Regarding the Sedgefield approach, the plan period is already at its halfway point and the Weston Villages are shortly expected to make a significant contribution to housing supply. It is important that the under-supply that has arisen as a result of the increase in the housing requirement through modified Policy CS13 is remedied as soon as practicable. The Sedgefield methodology, which corrects the backlog within the first 5 years, is therefore the appropriate approach.

Given the level of commitments that already exist, there would seem to be no reason why, subject to an appropriate allocation strategy, not least in terms of the residual requirement, the delivery trajectory cannot be escalated to respond to the backlog within the first five years, and without compromising the distribution strategy 'to steer a significant proportion of future development to the Witney, Carterton and Chipping Norton Sub-Areas'.
5 Year Supply

Main Modification 29 (paragraphs 5.34b) indicates that West Oxfordshire will apply the Liverpool method in calculating the 5-year housing land supply which seeks to address the under-supply over the plan period rather than the immediate 5-year period. IN016 (The Inspectors Preliminary Findings - Part 2 para 2.15) stated that WODC need to have regard for National Guidance as the Liverpool method is not mentioned. Furthermore, the Houses of Parliament Briefing Paper Number 03741 dated 25 May 2016 Planning for Housing states that Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period, thus the Sedgefield approach should be adopted. This is especially important given the severe shortfall of 1,836 homes and the serious affordability concerns in the district (house prices 10 times lowest incomes).

The Sedgefield approach would facilitate the backlog of supply to be addressed within the first five years of the plan rather than stretching the unmet need over the plan period. Planning Practice Guidance (PPG)5 states that Local Authorities should aim to deal with any undersupply within the first five years of the plan where possible. The Inspector as detailed in IN016 comments that WODC do need to have regard for National Policy on this matter, and that the Liverpool method is not mentioned, concluding that Sedgefield is preferred. As outlined above, due to poor delivery against the district’s revised housing target, there should be a reconsideration of whether the 20% buffer now applies. We have not seen any evidence that WODC has truly embraced the need to address housing delivery - even as recently as July 2016 WODC were seeking to rely on PBA’s housing update as a means of justifying a lower OAN. Over the last 13 months, since the adjournment of the EIP, Barton Willmore (and our clients) have never been asked: “how can Carterton help address housing needs in West Oxfordshire?” And this, despite the fact that David Wilson Homes (as part of the wider Barratt Group) delivered 17,319 new homes in the last 12 months (Annual Report & Accounts 2016). It also seems that the opportunity presented by the Carterton Town Master Plan has not been carried forward positively by WODC.

Existing commitments have been ‘complemented’ by a number of allocations locally, but ‘continual supply’ is questionable throughout the plan period, particularly between 2016-2021. It is still considered that WODC should adopt the Sedgefield method and address housing need in the short term and seek to allocate sites which can deliver in the short term.

The Council attempts to justify its approach in Paragraph 5.34c with reference to the capability of the development industry, including past performance within the district, and in terms of capacity in terms of housing land availability. However, this disregards the significant opportunity for additional development at Carterton and also reflects the fact that the Council no longer has an up to date Local Plan and has had difficulty in delivering major development sites in a timely manner. The Council’s rejection of allocating additional deliverable sites in unconstrained locations such as Carterton means that the authority is artificially constraining the supply and therefore limited choice and competition in the market, contrary to paragraph 47 of the NPPF. The way to address this will be to front load the draft plan with a range of development sites which can deliver in the first half of the plan period and in particular within the 5-year supply period. Additionally, whilst paragraph 5.34c is dismissive
of the development industry’s capability to deliver at over 1,000 dwellings annually, the current strategy of the authority expects this to occur between 2021 and 2031 (based upon 660 SHMA annual need + 275 dwellings annually for Oxford unmet need + a proportion of continuing unmet district need through application of Liverpool method). Consequently, there is no justification for delaying delivery of housing in West Oxfordshire post 2021 and the authority should consider all opportunities for early delivery, such as North Carterton, where the Town Master Plan started the assessment exercise some years ago.

Furthermore, and as stated above, the Council’s Housing Land Supply Position Statement October 2016 simply indicates that Eynsham will ‘kick in’ from 2021 onwards as ‘agreed’ through the joint work at the Growth Board: such a view is not supported by the statement above from the September 2016 OGB report which emphasises the sovereign nature of Local Plans in identifying land to address unmet need. Rather than the response to delivering new homes to meet unmet needs ‘kicking in’ in 2021, this should be seen as ‘kicking the can’ down the road. Unmet need, is, by definition, unmet. This is in marked contrast to the Inspector’s preliminary findings that it was his initial view that unmet Oxford City need would need to be taken into account in calculating the 5-year land supply (Paragraph 7.6 (IN015))

It is counter intuitive for the Council to hold the view that the present day need for housing should be addressed in 5 years’ time or beyond. The Inspector’s Preliminary Findings (IN015) confirmed that if the Council failed to consider the implications of unmet housing needs the plan would be out of date before it can be adopted. The inescapable conclusion to this is that unmet housing needs should begin to be addressed at the time of adoption of this plan: arguably now. Were that not the case, logically an early review which gives time to consider and then respond to unmet needs would be appropriate, which it is evidently not. The draft plan is not positively prepared nor consistent with national policy and will not be effective as a consequence in meeting development needs.

| MM752 | Bloombridge | Bloombridge | Mr Cutler | 1909 | 5 Year Supply | Main Modification 29 (paragraphs 5.34b) indicates that West Oxfordshire will apply the Liverpool method in calculating the 5-year housing land supply which seeks to address the under-supply over the plan period rather than the immediate 5-year period. IN016 (The Inspectors Preliminary Findings - Part 2 para 2.15) stated that WODC need to have regard for National Guidance as the Liverpool method is not mentioned. Furthermore, the Houses of Parliament Briefing Paper Number 03741 dated 25 May 2016 Planning for Housing states that Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period, thus the Sedgefield approach should be adopted. This is especially important given the severe shortfall of 1,836 homes and the serious affordability concerns in the district (house prices 10 times lowest incomes). The Sedgefield approach would facilitate the backlog of supply to be addressed within the first five years of the plan rather than stretching the unmet need over the plan period. Planning Practice Guidance (PPG5) states that Local Authorities should aim to deal with any undersupply within the first five years of the plan where possible. The Inspector as detailed in IN016 comments that WODC do need to have regard for National Policy on this matter, and that the Liverpool method is not mentioned, concluding that Sedgefield is preferred. As outlined above, due to poor delivery against the district’s revised housing target, there should be a reconsideration of whether the 20% buffer now applies. We have not seen any evidence that WODC has truly embraced the need to address housing delivery - even as recently as July 2016 WODC were seeking to rely on PBA’s housing update as a means of justifying a lower OAN. Over the last 13 months, since the adjournment of the EIP, Barton Willmore (and our clients) have never been asked: “how can Carterton help address housing needs in West |
Oxfordshire?" And this, despite the fact that David Wilson Homes (as part of the wider Barratt Group) delivered 17,319 new homes in the last 12 months (Annual Report & Accounts 2016). It also seems that the opportunity presented by the Carterton Town Master Plan has not been carried forward positively by WODC.

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It is counter intuitive for the Council to hold the view that the present day need for housing should be addressed in 5 years’ time or beyond. The Inspector’s Preliminary Findings (IN015) confirmed that if the Council failed to consider the implications of unmet housing needs the plan would be out of date before it can be adopted. The inescapable conclusion to this is that unmet housing needs should begin to be addressed at the time of adoption of this plan: arguably now. Were that not the case, logically an early review which gives time to consider and then respond to unmet needs would be appropriate, which it is evidently not. The draft plan is not positively prepared nor consistent with national policy and will not be effective as a consequence in meeting development needs.

MM756  Cantay Estates  Cantay Estates  -  Cantay  1951  > SECTION 5 - PROVIDING  MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the
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<td>MM771</td>
<td>Stormport (UK) Ltd</td>
<td>Stormport (UK) Ltd</td>
<td>-</td>
<td>2042</td>
<td>NEW HOMES &gt; MAIN 29</td>
<td>Estates published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound. Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.</td>
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<tr>
<td>MM772</td>
<td>Spitfire Homes</td>
<td>Spitfire Homes</td>
<td>-</td>
<td>2095</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>Stormport has the following observations to make in respect of maintaining a 5-year housing land supply. In terms of maintaining a supply, this is done on the basis of a District target, against which supply is assessed. In calculating that target, there is a need to ensure that the proposals not only meet the needs of the District, but also those of neighbouring Districts under the Duty to Co-operate (in this case Oxford City). Paragraph 5.34d makes it clear that the housing target for Eynsham is to be addressed differently, given that the bulk of this is allocated for meeting Oxford’s unmet needs. This ring fencing of housing requirements could lead to a situation where there is a delay in delivery of the new Garden Village and neighbouring Strategic Allocation, which means that the Council is unable to demonstrate a 5-year supply. This still means that the Council is failing to deliver housing as per its target and could lead to additional pressure for the further release of development sites.</td>
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<tr>
<td>MM773</td>
<td>Sharba Homes</td>
<td>Sharba Homes</td>
<td>-</td>
<td>2101</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>Savills has been instructed by Spitfire Homes to submit written representations to the West Oxfordshire Local Plan 2031 Proposed Main Modifications document. These representations are made in respect of land at Jubilee Lane, Milton under Wychwood. The site off Jubilee Lane, Milton under Wychwood comprises greenfield land to the south of existing built development. The site is well located to the village edge and represents a logical extension to the village providing an opportunity to improve the character of the edge of the settlement. Planning history for the site is limited. Spitfire Homes supports the Council’s position that windfall development will contribute to the supply of housing within the District. Furthermore, the identification of a windfall target for each sub-area is generally supported. Smaller windfall sites would have a shorter ‘lead-in’ time to development in comparison to strategic site delivery and the Council’s recognition that 125 dwellings per annum will come forward through Windfall Sites is supported.</td>
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With regards to the text in relation to Main Service Centres, Rural Service Centres and Villages within Policy H2 we would comment that the policy has the potential to be interpreted stringently given its wording. Furthermore, it refers to a criteria which is not within the policy. We would suggest that this is amended as follows below to reflect the potential for suitable, achievable and deliverable sites to come forward within the Plan period to assist in meeting the challenging delivery target of 15,950 homes to 2031.

"On undeveloped land within or adjoining the built-up area where the proposed development is necessary to meet identified housing needs, is suitable, achievable and deliverable, and is consistent policies in this plan in particular Policy OS2.”
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<tr>
<td>MM778</td>
<td>Kier Group</td>
<td>Kier Group</td>
<td>2114</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>In this instance, we believe that windfall sites have more opportunity to come forward for development to meet the housing requirement as those which have been allocated through either the Local Plan or Neighbourhood Plan. As noted at several points throughout these representations, land south west of Charlbury Road (B4022), Hailey offers a logical, sustainable extension to the village of Hailey, with good connections to the Main Service Centre of Witney to the south-east. The site is not constrained by landscape designations such as AONB or heritage assets as much of the District of West Oxfordshire is, and as such, the site offers the opportunity to contribute towards the continuation of a sustainable community and to the challenging housing requirement without a significant and detrimental impact upon the surrounding landscape setting of the village of Hailey.</td>
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<tr>
<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>2152</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>Strong objections are raised in respect of Paragraph 5.34B of the Plan and the intention to apply the Liverpool approach to dealing with backlog the of 1,836 homes. Applying the Liverpool methodology would not comply with the PPG which makes clear that dealing with backlog in the next five years is the preferred approach. Furthermore, delaying dealing with the backlog would be to reward failure, and would not be consistent with the Framework which requires boosting significantly the supply of housing now and not at some point in the future. The Council have chosen a strategy to deliver significant housing numbers through a range of Sustainable Urban Extensions. It is inevitable that these will not deliver quickly, through a combination of protracted planning process and the need to deliver infrastructure before housing. However, it is the Council that have determined the strategy and they could have elected to focus on an alternative strategy which delivered a greater number of smaller housing sites across key sustainable settlements in the District which would be an approach better able to deal with the significant backlog in a more timely manner and avoid the need to commit to the Liverpool methodology. It can be seen therefore that the Council have chosen a development strategy; the consequence is an inability to deal with backlog properly; and therefore has used the strategy decisions to argue against dealing with the backlog quickly at odds with the PPG and Framework. This is a significant issue since there are already considerable quantities of people on housing waiting lists and pent up demand in terms of seeking a home in the District, issues which will be perpetuated by the Councils chosen housing distribution strategy and consequential and inevitable commitment to the Liverpool methodology as a means to validate the approach. Further strong objections are lodged in respect of Paragraph 5.34D and the Councils desire to disaggregate housing land calculations for the purposes of five year housing land supply. There is no legitimate reason why this approach should be taken, it can draw no justification from the PPG or Framework, and is evidence of the Council seeking to avoid a commitment to delivery housing as quickly as possible.</td>
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<td>We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here. Sources of Supply The supporting text to Policy H2 sets out the various sources through which the housing requirement for West Oxfordshire will be met (excluding unmet need from Oxford City), as summarised in the table on page 6 of the attachment.</td>
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Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement for West Oxfordshire of 13,200 over the Plan period.

We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District, as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. There should be no delays to deliverability on any allocated site, in the context of a current 5 year housing land supply shortfall, and therefore reference to their delivery post-2021 should be deleted. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

The revised Policy as currently drafted states: “With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards.”

The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.
Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted within the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.

Other Matters

The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.
the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.

There is no compelling evidence to support or justify a departure from the clear aim of the PPG which is for the backlog to be resolved within the first 5 years of the plan period. Other local planning authorities within Oxfordshire (Cherwell District Council and Vale of White Horse District Council) have objectively assessed housing needs in excess of 1,000 dwellings per year, therefore why should this be considered not achievable in West Oxfordshire. There is no evidence presented to demonstrate why the development industry could not achieve these build rates. It is pertinent to note the reasons why there is a backlog in the supply of housing within the district.

This is predominantly due to the Council's inability to accept, and appropriately plan for, the full objectively assessed housing need for the district. The housing need is current and is exacerbated due to the severity of the backlog in delivery. This is not the time to suppress housing delivery by utilising the Liverpool method, on the contrary this is the time to boost housing supply to resolve the backlog as soon as possible, as advised by the PPG. The NPPF clearly indicates at paragraph 47 the need for local planning authorities to 'boost significantly the supply of housing'.

Five-Year Housing Land Supply – Oxford's unmet housing need

The Housing Land Supply Position Statement, states at paragraph 4.4 that: ‘it has been agreed through joint work carried out on behalf of the Oxfordshire Growth Board that this additional requirement [Oxford's unmet housing need] will only 'kick-in' from 2021 onwards in order to allow Local Plan process to determine the most appropriate site options as well as recognising the lead-in times for most large strategic sites’

There is no clear or justified reasoning as to why the agreed unmet need is not being planned for within the first 5 years of the plan period. Oxford's unmet housing need is acute and should be addressed at the earliest opportunity in the first 5-years of the plan period. It should not be left for a further backlog to accumulate. In the recent Local Plan examinations of Cherwell District Council and more recently the Vale of White Horse District Council, Oxford’s unmet need is to be addressed early within the first 5-years of the plan period. In the case of the more recent Vale of White Horse Local Plan examination, the Inspector requested main modifications to ensure Oxford’s unmet housing need is calculated within the overall housing requirement after a 2-year period from adoption of the Local Plan.

My client considers Oxford’s unmet housing need should be accommodated within the first 5-years of the plan period, or at the very latest 2-years from adoption of the WOLP, in conformity with other local authorities within the same housing market area.

The WOLP is not positively prepared and consistent with national planning policy insofar as it does not address Oxford’s unmet housing need within the first 5-years of the plan period. When taking into account Oxford’s unmet housing need within the 5-year housing land supply calculations, it is considered the Council are unable to demonstrate a 5-year housing land supply even based on the Council’s preferred Liverpool method. When utilising the Sedgefield method the Council are significantly short of a 5-year housing land supply of deliverable sites. The Council’s inability to demonstrate a 5-year housing land supply is contrary to paragraph 47 of the NPPF.
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<td></td>
<td>Council</td>
<td>(OCC)</td>
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<td>- PROVIVING NEW HOMES &gt; MAIN 29</td>
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<td>We support MMs 22, 29 and 30 which set out WODC’s proposal to use the Liverpool method to calculate their 5yr housing land supply figure and that sites for unmet need are unlikely to deliver housing until 2021 and therefore will not form part of the housing land supply calculation until 2021 onwards.</td>
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<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr</td>
<td>Murray and Blackwell</td>
<td>2307</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>MAIN 29 2.21. The landowners have the following observations to make in respect of maintaining a 5-year housing land supply. 2.22. In terms of maintaining a supply, this is done on the basis of a District target, against which supply is assessed. In calculating that target, there is a need to ensure that the proposals not only meet the needs of the District, but also those of neighbouring Districts under the Duty to Co-operate (in this case Oxford City). Paragraph 5.3.4 makes it clear that the housing target for Eynsham is to be addressed differently, given that the bulk of this is allocated for meeting Oxford’s unmet needs. This ring-fencing of housing requirements could lead to a situation where there is a delay in delivery of the new Garden Village and neighbouring Strategic Allocation, which means that the Council is unable to demonstrate a 5-year supply. This still means that the Council is falling to deliver housing as per its target and could lead to additional pressure for the further release of development sites.</td>
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<td>MM110</td>
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<td>Lagan Homes</td>
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<td>-</td>
<td>276</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 29</td>
<td>INTRODUCTION AND SUMMARY i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Lagan Homes who have land under their control off School Hill, Minster Lovell. The land extends to 2.5 ha and is identified on the plan attached as Appendix 1 to these representations. ii. Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy. iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply. iv. Land at School Lane is under the control of Lagan Homes, is available now and capable of delivering</td>
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### Land at School Lane, Minster Lovell

**1.0 LAND AT SCHOOL LANE, MINSTER LOVELL**

1. Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that Land at School Lane should be allocated for around 25 homes to help address this deficiency.

#### Site and Surrounding Area

1.2 The site lies adjacent to the village of Minster Lovell and the B4047 Burford Road some 3 miles (5km) west of Witney and 4 miles (6km) north of Carterton. There is an off-road cycle path to Witney (within reasonable cycling distance) and an hourly bus service to Witney. The village also has a number of amenities including a small shopping parade, Post Office, Primary School, Public House and Butcher. There are also several businesses along the Brize Norton Road.

1.3 The site is a single 2.5ha open grassland field immediately north of the Burford Road and west of School Lane. It is part of the north facing slope of the Windrush Valley. A site plan is attached at Appendix 1.

1.4 The site lies some 1m below the Burford Road and is screened by a strong hedgerow along the road frontage such that the open nature of the site is not readily perceptible from this frontage.

1.5 On the southern side of Burford Road is some modern development which is also mostly set back from the road frontage. The White Hart Public House (Listed Grade II) along with the War Memorial and Methodist Church frame the Brize Norton Road junction opposite the site. There is a farm access in the south western corner and a strong hedgerow bounds to the west along with a Thames Water pumping station.

1.6 School Lane leads to Little Minster. College Farm within Little Minster lies at the southern end of the site and there is a scattering of modern and historic buildings along School Land and School Hill.

1.7 School Lane and College Farm fall within a Conservation Area. A Conservation Area Appraisal has been prepared by the Council. The site is not identified in the appraisal as where there is a notable sensitive view into or out of the
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<td>Conservation Area. Buildings adjacent the site are identified as Locally Listed including College Farm and the Old School.</td>
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<td>1.10 The site forms part of the northern slopes of the Windrush Valley and falls within the Cotswold AONB. The West Oxfordshire Landscape Assessment (WOLA) identifies the site as part of the Upper Windrush Character Area and part of Semi-Enclosed Valley Side Farmland which is noted to be sensitive to views within an across the valley but where there may be limited opportunities to accommodate small scale development within a strong landscape structure. The settlement pattern identifies scattered villages along the valley with Charteville (New Minster) a notable exception being sited on higher land.</td>
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<td>1.11 The site is well screened from the Burford Road, but there are some more immediate views through boundary hedgerows from School Lane. The site is appreciable but not prominent in middle distance views back from the opposite side of the valley just south of Asthall Leigh. From here existing dwellings at Little Minster and north of the Burford Road are well screened by existing trees.</td>
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<td>1.12 There is no planning history of direct relevance to the site. The site lies within Flood Zone 1 Low Risk.</td>
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<td></td>
<td>1.13 Access is available to School Lane and to the Burford Road. Further technical work is underway to establish the most appropriate access point.</td>
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<td>1.14 Lagan Homes have only recently acquired an interest in the site and as such the site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELAA). Key Planning Site Considerations</td>
</tr>
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<td>1.15 Lagan Homes are in the process of undertaking technical and development design work to inform a planning application and this is likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as of particular relevance to the potential allocation of the site.</td>
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<tr>
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<td>The principle of housing development in Minster Lovell, north of the Burford Road</td>
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<td>1.16 Minster Lovell is identified as a village in the Local Plan 2031. Draft WOLP Policy H2 permits new housing adjacent to villages to meet housing needs. As such housing development on the site would be acceptable in principle.</td>
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<td>1.17 Draft Policies H2 and WIT4 seek delivery of 4,400 homes in the Witney Sub Area including Minster Lovell. Delivery is proposed through three Strategic Development Areas (SDAs - West, East and North Witney) each with strategic highway improvements. Land West of Minster Lovell is proposed for allocation confirming the suitability of the settlement for additional housing development.</td>
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<td>1.18 There is residual windfall requirement of 304 homes within the Witney Sub– Area.</td>
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<td>1.19 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which will likely result in continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead in times of SDAs, addressing the current supply deficiencies is best achieved through allocating</td>
</tr>
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</table>
1.20 Land at School Lane lies adjacent to Minster Lovell, close to amenities and public transport links. The village bus stops, public house and shops are located on the opposite site of the Burford Road to the site in very close proximity. The village school lies within 500m to the south. The site is also within cycling distance of the West Witney employment areas (2km) and Witney Town Centre (5km). In locational terms, it is sustainable. Indeed, the site lies closer to village amenities than the proposed allocation west of the village.

1.21 It is noted that Table 4.1 of the plan includes Minster Lovell as a village within the settlement hierarchy but this has been modified to (MM 14) to include reference to Minster Lovell 'south of the Burford Road'. Lagan Homes object to this modification.

1.22 In Edgars opinion, the development of Land at School Lane and north of the Burford Road can comply with Policy H2 in being adjacent to a village in the settlement hierarchy.

1.23 There is no reason why land at School Lane, north of the Burford Road, is in any way less sustainable in locational terms than other land adjoining the village. Indeed, land at School Lane is in closer proximity to many of the villages amenities, including the school, shops and public house than other land on the edge of the village.

Village character, AONB landscape and Conservation Area

1.24 Draft Policy OS2 Locating development in the right places states that villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. Development should form a logical complement to the settlement pattern, protect landscape character and settlement identity.

1.25 The site does not appear to have been part of the historic Chartist settlement for which Minster Lovell is known. The site does lie within the Cotswolds AONB and adjacent to a Conservation Area.

1.26 The site is not identified in the Council’s Conservation Area appraisal as where there is a notable sensitive view into or out of the Conservation Area.

1.27 Views of the site are already filtered by vegetation and topography. The WOLA identifies that this area of the Windrush Valley can accommodate development within a strong landscape structure. Indeed, in views from across the valley, existing landscape features act as a screen to existing dwellings on the Burford Road.

1.28 The setting of the Conservation Area and AONB can be preserved and enhanced through a low density but high quality development within a strong and extensive landscape structure. Although the extent of the land is 2.5ha, only around 25 dwellings are proposed leaving significant scope for open space and landscaping.

1.29 In Edgars opinion, a development of this scale does not comprise ‘major’ development for the purposes of NPPF paragraph 116 and that a development within a strong landscape structure will not have a significant impact on the landscape and scenic beauty of the wider AONB.
1.30 A low density development within a strong landscape structure will also respects the settlement pattern and separate identities of Little Minster and Minster Lovell.

1.31 Although further work is being undertaken, Edgars consider that development can be achieved on the site which makes an important contribution to meeting housing land supply in a sustainable location, without significant impact on the settlement character, AONB or adjoining Conservation Area.

1.32 Further detailed technical information and development design work is likely to be available during the next stages of the WOLP 2031 Examination.

Developers want to build family housing, but that isn’t what West Oxfordshire needs. There is plenty of larger housing (which is generally under-occupied) in the existing stock. Overall, we consider that a total windfall allowance of 1,380 in clause 5.34a, is modest and could be increased. We suggest a review of recent permissions, which will be indicative of windfall potential. For example the Springfield Oval (Witney) application for 75 homes is recommended for approval and so will add 75 units to the supply and we believe that this is not counted. There have been a number of significant applications even since the Local Plan was redrafted- 40 here and 14 there and it all adds up. Most are recommended for approval. There are outstanding appeal results too, which may further increase the supply.

We do not consider that it is necessary to exclude any further windfall over the next five years to avoid double counting. The small developments upon which the windfall target relies are normally completed quickly after permission is granted and applications continue to come in. A two-year lag should be sufficient, leaving 13 years left in the Plan Period during which windfall opportunities can come forward, receive appropriate permission, and be completed: discounting permissions only in the final two years, accepting that delivery would be unlikely in that timeframe.

Stagecoach recognises that delivering the trajectory of housing completions implied by the Plan will present all stakeholders with challenges. Indeed, resource requirements within the development management function are likely to need considerable strengthening, to deal with the larger volume of work, on sites that by their very nature are greatly more complex to bring forward, and consequently much harder to implement propitiously.

It is also clearly the case that bringing forward the Strategic Development Areas, and in particular the largest-scale scheme at the Garden Village to meet Oxford’s unmet needs will unavoidably require a meaningful lead time to secure relevant consents, discharge conditions, work up detailed designs and then mobilise construction on-site, starting with large scale infrastructure. A four-year horizon from the point the Plan is likely to be adopted would represent a credible period to allow such a project to progress to the point of delivery.

Therefore, Stagecoach supports the Councils position that it would be more appropriate to set back delivery to meet Oxford’s OAN to later in the Plan period, starting in 2021, and applying the “Liverpool” methodology, rather than the “Sedgefield” methodology that seeks to make up any backlog within the first five years of the Plan.

There is also a significant backlog to addressing the endogenous OAN of about 660 dwellings per annum.
which the lack of issued major consents threatens to aggravate in the short term. This risks a situation where Paragraph 47-49 of NPPF remains applicable for the foreseeable future, in the absence of measures to apply a stepped trajectory that allows delivery of existing commitments and allocations to be brought forward progressively, and allow a suitably reasonable transition period to allow rates of delivery to ramp up between 2016 and 2021.

Such an approach to the trajectory also allows for a significant number of factors known to affect the delivery of the North of Witney SDA to be fully appraised and robust solutions formulated and tested. Stagecoach notes that the West End Link Road, which is a requirement for the allocation to come forward, will require third party funding, the scale of which itself depends in some measure upon any mitigations required to satisfy hydrological and environmental concerns. The draft Plan indicates that measures to attenuate surface water run-off also apparently require further definition. It is clear from the language elsewhere in the Plan that most of this site west of New Yatt Road, cannot be relied on to contribute to the trajectory until after 2021.

It is also likely that delivery of the Chipping Norton SDA will largely take place after 2021.

In the short term, without a suitably ambitious but realistic definition of the trajectory under the “Liverpool” methodology, the Authority risks becoming bogged down by “planning through Appeal”. In the clear absence of many alternative sites that can credibly take advantage of the opportunities for public transport in particular, this risks leading to an ad-hoc reactive approach to the location of housing delivery, where ever-more-remote sites are selected and brought forward, where public transport is either weak, or indeed entirely absent.

This is already a demonstrable trend within the District. Stagecoach sets out below, a list of the sites subject to recent planning applications within the District that benefit from little or nothing in the way of a credible public transport offer, and therefore cannot be realistically considered to be anything other than entirely car-dependent in practice. Many of these sites now benefit from resolution to grant, and some are now included as draft allocations within the Plan.

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<thead>
<tr>
<th>WODC Ref</th>
<th>Settlement</th>
<th>Quantum</th>
<th>Buses to nearest town centre (departures/weekday) available</th>
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<tbody>
<tr>
<td>15/04463/OUT</td>
<td>Minster Lovell</td>
<td>58</td>
<td>13</td>
</tr>
<tr>
<td>16/00758/OUT</td>
<td>Ducklington</td>
<td>24</td>
<td>13</td>
</tr>
<tr>
<td>16/01054/OUT</td>
<td>Stanton Harcourt</td>
<td>50</td>
<td>NIL</td>
</tr>
<tr>
<td>16/01353/OUT</td>
<td>Freeland</td>
<td>45</td>
<td>5</td>
</tr>
<tr>
<td>16/01540/OUT</td>
<td>Hailey</td>
<td>25</td>
<td>9</td>
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<tr>
<td>16/02588/OUT</td>
<td>Minster Lovell</td>
<td>85</td>
<td>13</td>
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<tr>
<td>16/02851/OUT</td>
<td>Shipton under Wychwood</td>
<td>44</td>
<td>NIL</td>
</tr>
<tr>
<td>16/03005/OUT</td>
<td>Aston</td>
<td>30</td>
<td>8</td>
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</table>
Attempting to meet a Sedgefield-based housing land supply trajectory therefore sets the District up to remain very prone to applications submitted outside the Plan-led system. Where a significant number of opportunities well served by sustainable modes to be available, this may not pose too serious a difficulty in terms of the consequential outcomes in the form of high levels of traffic growth. The table above shows that this is not the case in West Oxfordshire.

It is absolutely essential given the current transport challenges and levels of traffic congestion in the District, that the 5-year supply target is achievable to ensure development is directed to, and delivered in those locations where a good range of credible sustainable transport options already are, or can be provided. The alternative risks further seriously exacerbating an excessive level of car dependence, that disproportionately would contribute to traffic growth rates, aggravating already severe congestion across the District.

| MM388 | Ainscough Strategic Land | Ainscough Strategic Land | Ainscough Strategic Land | 866 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 29 | Strategic Development Areas (MM27)

3.22 One of our gravest concern relating to the housing delivery strategy for the Local Plan is in relation to the high reliance on large strategic sites as listed in MM27. Whilst we do not object to the principle of the development locations per se, we do raise issues with the delivery that is expected from these sites over the plan period and in some cases, the physical capacity for them to deliver the targets suggested.

3.23 Indeed, the Council imply at paragraph 5.25 of the modified Local Plan that past completions have been low because of the lack of urgency from the development sector to bring strategic sites forward. The reality is strategic sites simply take time to properly plan and deliver, principally because their impacts are exponentially greater, they need thorough consideration, and the complexity of land ownerships and scale inevitably result in longer lead in times that those experienced with smaller, more moderate sites.

3.24 As set out in Table 3 below, SDAs are to provide 42.0%, 58.3% and 58.1% of the total number of homes required in the Witney, Chipping Norton and Eynsham-Woodstock sub-areas. This strategy needs to be considered with considerable caution. Should any of the SDA encounter delay to their delivery, these sub-areas and the district as a whole would not meet the housing requirement over the plan period. This is particularly pertinent in the case of Witney and Carterton where there are two very large commitments already which not listed in the table below (ATTACHED).

3.25 Table 4 (ATTACHED) identifies the five SDAs within the district and the number of homes they are expected to deliver over the plan period based on the Council’s trajectory.

3.26 Understandably, the overall housing requirement from each of the five SDAs will only be achieved at the very end of the plan period. Thus, should the delivery of one or more SDA slip by just one or two years the plan will fail to meet its housing requirement over the plan period. This is not implausible given the complexity of delivering these SDAs, which we address in more detail in Section 4.

3.27 In order to explore delivery rates from large scale site such as the SDA’s identified in the Local Plan, it is important to be aware of the following three reports / assessment, which are all based a large amount of empirical data:
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<td>* A Report into the Delivery of Urban Extensions (Hourigan Connolly, February 2014) (Appendix 1)</td>
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<td>* Urban Extensions, Assessment of Delivery rates (Savills, October 2014) (Appendix 2)</td>
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<tr>
<td>* Start to Finish: How Quickly do large-Scale Housing Sites Deliver? (NLP, November 2016) (Appendix 3)</td>
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3.28 The Hourigan Connolly report on the delivery of urban extensions highlights the difficulties and time it can take to bring forward such sites. It is worth highlighting the following key factors as reported in Section 15 of that document, namely the average times for the various stages of the planning process. These are:

* Average timescale from submission to grant of outline planning permission is 34 months;
* Average timescale for signing a legal agreement 24 months; and,
* Reserved matters applications 6-9 months.

3.29 Subsequent to that report, the Savills report looks at urban extensions and their delivery rates. In terms of lead in time the report is clear that a period of 3-4 years from the determination of an outline planning application to the completion of site preparation and the delivery of housing is a realistic average time scale for the delivery of housing. The study notes that sites which have particularly complex land packages and or significant strategic infrastructure to deliver can take significantly longer than estimated. The report lists examples of sites where Section 106 agreements in themselves have taken 64 months to agree, with the average being 14 months.

3.30 The Savills report goes on to consider how fast a major site may build out. On average it found that in the first year of construction a site delivered 65 units, this increased to 110-120 dwellings per annum in subsequent years, before dropping towards the end of the life cycle of the development. These rates are obviously averages and dependant on a range of factors, however the report makes clear that any spikes on sites considered within the report were down to very specific delivery factors e.g. the need to deliver a large lump of affordable housing in one go due to the funding requirements of a partner.

3.31 The NLP report relates to housing delivery and assesses 70 large schemes (500 homes +) which have come forward in the last 20 years, and 83 smaller sites (50-499 homes). The report commented on average delivery from conception to start on site looking at:

* Lead in time prior to submission of an application;
* Planning approval period; and,
* Annual build out rates.

3.32 The average lead-in time for large sites is identified by NLP as 3.9 years (i.e. from the point a site is first identified in a Local Plan).

3.33 The planning approval period is measured from the validation date of the first application for the proposed development. The end date is the decision date of the first detailed application which permits the development of dwellings on site. The planning approval period of all sites, both large and small, is identified by NLP as:

* 2.8 years (0-99 homes)
* 4.1 years (100-499 homes)
* 5.3 years (500-999 homes)
* 5.6 years (1000-1499 homes)
* 6.5 years (1500-1999 homes)
3.34 NLP also identify the annual build-out rate falls within the overall build period of each site. The annual build out rates are influenced by the size of the site and NLP arrives at the following:

- 27 dwellings per annual (dpa) (0-99 homes)
- 60 dpa (100-499 homes)
- 68 dpa (500-999 homes)
- 105 dpa (1000-1499 homes)
- 135 dpa (1500-1999 homes)
- 161 dpa (2000+ homes)

3.35 There are clear comparable and a common themes running through each of the three assessment (i.e. large sites take time to delivery).

3.36 Given NLP’s assessment is the most recent, we have considered the trajectory from each of the West Oxfordshire SDAs using the two different variables (build out rates and lead-in times). Under each scenario, the full delivery of the 6,450 homes identified within the SDAs are not delivered during the plan period resulting in a shortfall in the delivery of the housing requirements of the district ranging from 2,210 to 2,311 homes.

3.37 Table 5 (Attached) applies the NLP lead-in time to the Council’s build-out rates, and identifies that the Chipping Norton, Garden Village and West Eynsham SDA would not be delivered in full during the plan period, resulting in an overall shortfall of 2,210 homes over the plan period.

3.38 Table 6 (Attached) applies both the NLP build-out rates and lead-in times from first identification of the SDA, and identifies that only the East Witney SDA would be delivered in full during the plan period, resulting in an overall shortfall of 2,311 homes over the plan period.

Conclusions Applying NLP Recommendations on Delivery

3.39 Whilst applying the NLP assumptions is a theoretical approach to identifying the delivery of the five SDAs over the plan period, the assumptions are based on empirical data from a large number of development proposals. As such, it cannot be dismissed out of hand. However, we do recognise that there is a need to consider the specific circumstances in relation to West Oxfordshire and each of the SDA sites identified. Nevertheless, the above exercise clearly demonstrates that the Council’s trajectory certainly needs to be considered with significant caution.

3.40 We go on to present our own view and final position on the Council’s trajectory / delivery from the SDA’s in Section 4 having reviewed each of the sites in more detail including their ability to accommodate the suggested number of dwellings. Following this analysis is our final position that is out in Table 7 below (Attached).

3.41 As per the NLP analysis, we agree that East Witney will be completed. We have some genuine concerns over the delivery of the West Eynsham site for a range of reasons but ultimately conclude that this site could potentially be complete within the plan period. However, we take greater issue with the ability for the following three SDAs to deliver within the plan period for reasons set out below and conclude/calculate a shortfall of 1,784 dwellings from these SDA’s over the plan period:
2.23 We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.
Sources of Supply

2.24 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED)

2.25 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period.

2.26 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

2.27 The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

2.28 The revised Policy as currently drafted states:
“With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards.”

2.29 The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.30 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:
“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per
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Year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.

2.31 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.32 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.33 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.34 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

2.35 In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

2.36 As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an
approach would be unsound and the Inspector in his preliminary findings advised that
the apportionment figure should be counted within the five year housing land supply. As
such we would recommend that the policy text is re-worded to clarify this position.

Other Matters

2.37 The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are
addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state
development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.

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<th>Respondent ID</th>
<th>Respondent Organisation</th>
<th>Respondent Name</th>
<th>Respondent Title</th>
<th>Respondent Surname</th>
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</thead>
<tbody>
<tr>
<td>MM9</td>
<td>Private</td>
<td>Roger Ball</td>
<td>Mr</td>
<td>Ball</td>
<td>10</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>The important point is that much of the new housing should consist of small affordable starter homes built to a basic standard. Purchases should have the option of paying for fully fitted kitchens, bathrooms, in-built wardrobes, garages, lawns etc etc if they wish. To keep down the cost, expensive landscaping (both hard and soft) should be avoided - it only adds to the cost of the houses. Similarly, it is self-defeating to require a developer to pay for extensive off-site highway works because again the cost is only added to the cost of each house. The Highway Authority, Thames Water and the Environment Agency are very good at passing on the cost of off-site works to the developer without thought to the eventual cost of each house. Starter homes are required now. I trust that WODC will, as speedily as possible, get on with opening-up land for development. Only last week I learned that one of Witney’s GP Surgeries is unable to recruit new doctors because of the cost of housing. If a newly qualified doctor cannot afford a house in Witney what hope is there for others?</td>
</tr>
<tr>
<td>MM613</td>
<td>Empire Homes LTD</td>
<td>Brendan</td>
<td>Mr</td>
<td>O’Brien</td>
<td>1402</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Empire Homes Limited object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and CA3 (MM134) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply. Land at Sunset View, Carterton, is under the control of Empire Homes Limited, is available now and capable of delivering around 41 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered. These representations provide information on the Land at Sunset View and should be read in conjunction with Edgars Limited’s representations regarding housing supply which are not repeated here.</td>
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<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
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<td>Crest Strategic Projects</td>
<td>1423</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Main 30: Policy H2 3.54 For the reasons set out in response to Main 29 it is not considered that the Council has provided a convincing justification of why it is appropriate to apply the residual approach to addressing housing shortfalls within the first five years of the Plan period. Contrary to the contention at 5.34c there are sites that are available and have been assessed against the same SA criteria as sites allocated within the draft Local</td>
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Plan, achieving very similar ratings. The Council’s assessment exercise does not bear close scrutiny and it is questionable whether a consistent and objective approach has been taken to site selection. The proposed approach to addressing the backlog is therefore considered to be unjustified against the evidence and is therefore unsound.

3.55 With regard to the criteria applied to assessing development proposals at the Main Service Centres, Rural Service Centres and Villages there is a cross reference to qualifying criteria listed at ‘3’), which has been deleted via the proposed modifications. This drafting error should be addressed.

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<thead>
<tr>
<th>MM741</th>
<th>CPRE Oxfordshire</th>
<th>Helen CPRE Oxon</th>
<th>Mrs Marshall</th>
<th>1450</th>
<th>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</th>
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<td>Affordable housing</td>
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<td>With regard to policy H3 &amp; clause 5.50, CPRE does not support the low affordable housing provision and lack of care for the elderly provision in low and medium value areas. Viability issues are understood, but CPRE would like to see detailed figures to be convinced. At the very least, in a District with an ageing population, housing for the elderly should be provided through all allocated sites.</td>
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<td>MM722</td>
<td></td>
<td>Graham Flint</td>
<td>Mr Flint</td>
<td>1637</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
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### Respondent

**ID**
**Respondent Organisation**
**Respondent Name**
**Respondent Title**
**Respondent Surname**
**Comment ID**
**Document Full Path**
**Comment**

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<th>MM725</th>
<th>Rectory Homes Limited</th>
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<th>1641</th>
<th>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 24</th>
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2016 (Ref: APP/D3125/W/15/3129767). It is therefore considered that the land on the north side of Witney Road, which has similar characteristics is also suitable for allocation. The fact that the Council acknowledges that the shortfall will not be made up over the next five years, indicates that if deliverable sites are available they should be allocated.

Additional housing sites are required to be allocated to ensure sufficient housing land supply

1. **THE FIVE YEAR HOUSING REQUIREMENT**
   1.1. The Council now use the 2014 Strategic Housing Market Assessment (SHMA) based housing requirement of 660 dwellings per annum (dpa) for West Oxfordshire. This is now in line with Edgars previous representations to the WOLP 2031.

1.2. The Council has now agreed to accept 2,750 dwellings of Oxford City Council’s unmet housing need for the period 2011-2031. Now that this apportionment has been agreed, this housing should be added to the five year housing requirement.

1.3. Under paragraph 47 of the National Planning Policy Framework (NPPF), Oxford’s unmet housing needs are part of the full objectively assessed housing needs of West Oxfordshire. Paragraph 47 is explicit that Local Plans meet the full housing needs of the housing market area (first bullet point of paragraph 47) which includes Oxford, and that sufficient sites need to be identified to provide 5 years of housing against housing requirements (second bullet).

1.4. Inclusion of Oxford’s unmet needs into the five year housing requirement is, therefore, required in accordance with the NPPF.

1.5. Indeed, in his preliminary findings (IN015) the Inspector appeared to accept this view in commenting at paragraph 7.6 that: If any such apportionment is made then that would become part of the housing need for the district. Any such apportionment is not immediately a definitive housing requirement, since it must be taken through a local plan process to test its deliverability and environmental impact. Nevertheless, it will be a figure of considerable significance and weight, since it will have emerged from an evidence-based process to inform spatial options for growth outside Oxford City. My initial view is that it would need to be taken into account in calculating the 5 year land supply.

1.6. Edgars agree with this view in as much that the Oxford apportionment is part of the housing need for the District and as such it should now be taken into account in calculating the 5 year land supply.

1.7. It is also of note that in a recent appeal relating to Land at Hanborough Station the Council signed a Statement of Common Ground (Appendix 1, paragraphs 2.4 – 2.12) agreeing that the Oxford’s housing needs be added to West Oxfordshire’s housing needs for the purposes of the 5 year requirement.

1.8. The Council at paragraph 5.34d (MM 29) of the modified plan, however, state that it will treat Oxford’s housing needs separately and only as part of the 5 year requirement in the years 2021 - 2031.

1.9. The Council’s approach is contrary to paragraph 47 of the NPPF, the requirement to boost housing supply and the requirement to provide a five year supply of sites which addresses housing needs across the housing market area.

1.10. Now the apportionment has been agreed, Oxford’s needs should start to be dealt with now. There is, in
Edgars opinion, an imperative to do so having regard to the scale of unmet needs of Oxford and the related poor affordability and availability of housing in the City.

1.11. These are precisely the issues which the wording of paragraph 47 to 'boost significantly the supply of housing' seek to address. To delay dealing with Oxford’s unmet needs until 2021 will only compound such issues.

1.12. Furthermore, as is further explained later, the Council’s approach to Oxford’s unmet need is to put all of these ‘eggs in one basket’. That is the Council seek to deliver all of it’s apportionment of Oxford’s unmet need in a single location, Eynsham, across what will be two major and linked sites.

1.13. Both sites involve multiple landowners and have significant infrastructure requirements. Delivery of such sites will be complex with delivery rates uncertain.

1.14. In Edgars experience such major urban extensions with multiple landowners and major infrastructure have relatively long gestation periods before delivery on the ground.

1.15. Edgars furthermore question the delivery of over 3,000 dwellings at Eynsham between 2021 and 2031 – up to 325 homes per year in a single location. This rate of delivery in a single location is not considered realistic in Edgars opinion.

1.16. Edgars consider that Oxford’s needs can in part be met by other sites in the area whilst major sites such as the Tilgarsley Garden Village come on line.

1.17. Inclusion of Oxford’s need in the five year supply serves to ensure that Oxford’s unmet need is addressed in a timely manner. It will also mean that Oxford’s need will more likely be addressed in the plan period and that a larger unmet need is not accumulated for future plan periods.

1.18. The 2,750 dwellings of Oxford’s unmet needs which West Oxfordshire have agreed to accept represents an additional 137.5 dpa. Together with the identified needs of West Oxfordshire itself (660dpa) this represents a total housing requirement of 797.5 dpa.

1.19. The base five year requirement for 2016 – 2021 is therefore 3,987.5, rounded 3,988 dwellings.

2. DEALING WITH PAST SHORTFALLS (LIVERPOOL/SEDGEFIELD)

2.1. Edgars consider that the shortfall in supply should be made up in the first 5 years (Sedgefield) method. This method most closely reflects advice of the PPG (Paragraph: 035 Reference ID: 3-035-20140306) which states: Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’.

2.2. There is no reference in national planning guidance to the approach which the Council seek to use which is to spread the past backlog over the remaining plan period, the so called 'Liverpool' approach.

2.3. In Edgars opinion, there is good reason not to spread backlogs over the remaining plan period as this will simply store up a potential housing delivery issue rather than deal with it – the Liverpool approach will continue to risk the delivery of housing needs (both West Oxfordshire’s and Oxford’s).

2.4. It is noted that the NPPG does offer an alternative to the Sedgefield approach, that alternative being to work with neighbouring authorities under the Duty to Cooperate. That is not what is proposed by West Oxfordshire.

2.5. There is no reference to the Liverpool approach in national planning guidance. The Local Plan Inspector highlighted this to the Council in his Preliminary Findings notes (IN016, paragraph 2.15):

"The Council needs to have particular regard to National Guidance on this matter, as the "Liverpool method"
(spreading the shortfall over the whole plan period) is not mentioned."

2.6. The Council has not provided any robust justification to divert from national guidance on this matter.

2.7. The issue is commented upon in the modified plan at paragraphs 5.34b to 5.34d (MM29). This appears to be the Council’s only justification for its approach and its arguments may be summarised as:
   - A degree of realism is needed about what can be achieved by the development industry;
   - The Sedgefield method would need in excess of 1,000 homes per year to be built over the next 5 years which is in excess of what has been achieved in the past;
   - Insufficient capacity has been identified through the housing land availability assessment and to achieve it would mean releasing a large number of unsuitable sites;

2.8. In Edgar’s opinion the Council’s approach and justification is flawed and inadequate.

2.9. Firstly, delivery of housing in excess of 1,000 dwellings per year has never been achieved as the Council has never released sufficient sites to achieve such rates of delivery. Past plans have been guided by Oxfordshire Structure Plans which explicitly advocated policies of restraint and not current policies seeking to ‘boost significantly the supply of housing’.

2.10. Housing allocations and planning permissions have largely been constrained to a limited number of large strategic allocations at limited locations (Witney and Carterton predominantly) along with small windfall sites.

2.11. Edgars consider that a more varied approach to supply can achieve higher delivery rates and that small to medium scale, non-strategic allocations in a variety of locations will achieve this.

2.12. It should be noted that this has not occurred in the district under previous plan periods and only recently has a number of additional non-allocated sites received planning permission an on appeal.

2.13. Secondly, but significantly, although the Council question the delivery of 1,000 dwellings per year for the purposes of five year housing land supply, the Council accept this is possible in later years of the plan in the housing trajectory at Appendix 2 of the modified plan. This indicates that the Council consider that up to 1,250 dwellings per annum is deliverable.

2.14. The question then seems to be not whether 1,000 dwellings per annum is achievable but whether the Council are prepared to release sufficient sites to achieve it.

2.15. Edgars represent a number of clients promoting small to medium scale sites in a number of locations which are sustainable and deliverable and could help the Council achieve higher rates of deliver in the first 5 years of the plan to accord with the Sedgefield approach.

3. BUFFER – 5% OR 20% BUFFER

3.1. NPPF paragraph 47 states that the housing requirement should include an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. It goes on to state that: "Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply [Edgars emphasis] and to ensure choice and competition in the market for land”

3.2. It is noted that the Local Plan Inspector in his preliminary findings (IN016, paragraph 2.14) took the view that persistent under delivery should be assessed over a 10 year period and at that time (December 2015) it
would be unreasonable to conclude persistent under delivery. The Inspector also commented that: “If delivery continues to be below that which is required, future decision makers may take a different view. The Council would be in a more robust position going forward if the plan creates a 5 year supply with a buffer greater than 5%, thus allowing for any unexpected delays on some sites.”

3.3. Delivery for 2015/2016 has now been published by the Council and as shown in Appendix 2 of the Draft Local Plan was 246 dwellings. Delivery for 2016 – 2017 is indicated to be 515 dwellings.

3.4. This means that for the first 5 years of the plan period the Council has significantly under delivered against its target and this is also expected in 2016-2017.

3.5. Over the first 5 years of the plan period, 2011-2016, the Council has achieved an average of 293 new homes per annum against an annualised requirement for West Oxfordshire of 660 homes.

3.6. It has resulted in a significant backlog of housing delivery against West Oxfordshire’s requirement (660dpa) of 1,836 homes. There is now also a backlog of 687 homes relating to Oxford’s unmet needs. Together this represents a backlog of 2,524 homes.

3.7. As noted above, NPPF paragraph 47 advocates a 20% buffer to provide a realistic prospect of achieving the planned supply. The Inspector highlighted to the Council that a buffer of more than 5% would help to mitigate any expected delays on some sites.

3.8. Delays on strategic sites and allocated sites are not uncommon. In Edgars view they are much more likely for large strategic sites with significant infrastructure delivery requirements and multiple landowners. Large sites typically have significant infrastructure requirements, complex S106 agreements and substantial pre-commencement works.

3.9. Looking back at the WODC 2010 Annual Monitoring Report (Appendix 2, Table 2) which presents the forecast completions on sites at that point it is clear that: o 200 dwellings on the remaining part of the Carterton North East Development Area were expected to be complete by 2015 - the site now has planning permission and has started. Completions are now expected in the period 2016 – 2021.

o 200 dwellings at West Witney (Proposal 8) were expected to be delivered by 2015. the site does not yet have a planning decision and completions are not expected until 2018.

3.10. This identifies that there has been slippage on sites in the District in the past for various reasons.

3.11. As set out in Section 6 in Edgars representations, Edgars consider that the increased delivery at key strategic sites is uncertain and unjustified and this provides additional justification for adopting a 20% buffer.

3.12. As indicated previously by the Local Plan Inspector, the Council should apply a greater buffer than 5 % to ensure robustness in the supply. Taking into account of the underdelivery housing against the District’s requirement 2011- 2016, expected underdelivery in 2016-17 and the likely under delivery at SDAs, Edgars consider that a 20% buffer must now be applied.

4. DELIVERABLE SUPPLY

4.1. Edgars has reviewed the deliverable supply within the October 2016 5 year supply statement which considers the supply within the period 2016-2021. This indicates a total deliverable supply of 4,514 dwellings in the period 2016-2021.

4.2. In Edgars opinion delivery on the following sites should be removed from the supply:

- East Chipping Norton (200 dwellings)
- Carterton Petrol Station (35 dwellings)
4.3. It is noted that delivery on major SDAs with significant infrastructure (East Witney and North Witney for example) has now been excluded from the supply 2016-2021.

4.4. Delivery of 200 dwellings on land east of Chipping Norton (Tank Farm) is however included in the supply. The Council comment that this is a large strategic site with a lengthy lead in time but that several parcels of land lend themselves to early release without prejudice to the remainder of the scheme.

These parcels of land include The Pillars and the former Parker Knoll site.

4.5. There is no current application at the Parker Knoll site to indicate deliverability.

4.6. There is a current planning application at The Pillars (Ref 16/03416/OUT) for 100 dwellings. The application proposal does not make provision for the proposed East Chipping Norton link road and is subject to an objection from OCC Highways as a consequence. The proposed alignment of the Eastern Link Road passes through the site.

4.7. The East Chipping Norton link Road is a major piece of infrastructure and it is clearly expected that land at the Pillars is part of the delivery of the SDA and link road.

4.8. Edgars fail to see, therefore, how the Council can agree to its early release until negotiations regarding the remainder of the SDA have been completed to ensure the delivery of the Eastern Link Road.

4.9. It is noted that the Council previously included 200 dwellings within the 5 year supply at North Witney in advance of the West End Link Road but have now removed these dwellings from the 5 year supply commenting ‘complex site with major infrastructure costs’.

4.10. Consistent with the Council’s approach on other SDAs with major infrastructure, including North Witney and East Witney, delivery of 200 dwellings at the East Chipping Norton SDA should be removed from the 5 year supply.

Carterton Petrol Station

4.11. The Council include 35 dwellings in the five year supply at Carterton Petrol Station. The site previously had a consent for residential development 10/1287/P/OP, granted 28th March 2013. As is standard, Condition 1 required Reserved Matters within 3 years. This permission has now lapsed. The site cannot be considered deliverable.

4.12. In summary, Edgars has identified that the deliverable supply in the period 2016-2021 should be discounted by 235 dwellings resulting in a revised deliverable supply of 4,279 dwellings.

5. REVISED FIVE YEAR SUPPLY POSITION

5.1. Having regard to the above, Edgars consider that the following assumptions should be applied to the Five Year Housing Land Supply Position:

- The Five Year Housing Requirement should include both West Oxfordshire’s needs (660 dpa) and Oxford’s unmet needs (137.5dpa) giving a total annual requirement of 798 dpa.
- Past shortfalls in delivery should be addressed in the five year period ‘Sedgefield’ approach, in accordance with national guidance. There is no robust justification to divert from this.
- Buffer – having regard to the extent of shortfall now identified due to past under delivery and the likelihood of further slippage and under delivery on key strategic sites, a 20% buffer should now be applied.
- Supply – the supply is over estimated and should be discounted by 235 dwellings.

5.2. As shown in Table 1 (Attached) below Edgars conclude that only a 2.7 year housing supply can be
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<td>demonstrated. Additional non-strategic sites are therefore required to be allocated to address this deficiency in supply.</td>
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<td>6. DELIVERY AT EYNSHAM SDAS (MM152 – 158)</td>
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<td>6.1. Edgars has significant concerns regarding delivery at SDAs promoted in the modified plan, including the rate of delivery assumed for strategic growth at Eynsham.</td>
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<td>Development lead in times for major development areas</td>
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<td>6.2. Large SDAs with significant infrastructure and often multiple landowners typically have significant lead in times from allocation or a resolution to grant permission to delivery on site.</td>
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<td>6.3. Recent experience in West Oxfordshire has shown this lead in time can be considerable. This is exemplified by West Witney the Council’s most recent SDA. Planning application 12/0084/P/OP for 1,000 dwellings, an employment area, new junction on A40, local centre and primary school received a resolution to grant consent in March 2013. The S106 has still not been signed at December 2016 and no decision issued. The site is now expected to deliver homes from 2018/19.</td>
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<td>6.4. This experience would indicate that there can be a period of 5 years between a resolution to grant consent and delivery on site. This does include time for the initial planning application to be prepared and decided which for a major site is likely to be 6 months to 1 year. It also does not allow time for any Compulsory Purchase Order Inquiry (CPO) which may be required on some sites.</td>
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<td>6.5. It is noted that the Council does not now assume delivery on most of its proposed SDAs until 2021.</td>
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<td>6.6. With examination hearings likely to continue during 2017, the Local Plan Inspectors report is likely to be expected toward the end of 2017 or early in 2018.</td>
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<td>6.7. With a 5 year lead in period for a major urban extension with multiple landowners, notably the Eynsham Garden Village, there is a risk that delivery is not realised until 2022/2023.</td>
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<td>6.8. It is also understood that the Council (modified plan para 9.5.40g) will seek to prepare and adopt an Area Action Plan for this site. This will also add to the lead in time for delivery at the Garden Village.</td>
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<td>6.9. If the WOLP 2031 is adopted toward the end of 2017/18 and an Area Action Plan progressed swiftly and adopted toward the end of 2018/19, this would leave very limited time for the preparation of an outline planning application, negotiation of a S106 agreement, reserved matters and pre-commencement works to achieve first delivery by 2021. In Edgars opinion, delivery from at least 2022/23 is more realistic. Past Delivery Rates on SDAs</td>
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<td>6.10. Edgars obtained past delivery rates from the Council for the last two major urban extensions in the district – North East Carterton (Shilton Park) and North East Witney (Madley Park).</td>
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<td>6.11. It is understood that at least 4 housebuilders were active on each site. There is a peak of delivery at North East Carterton in 2004/05 which is out of scale with</td>
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<td>6.12. The average delivery rate per annum was similar for each site at around 125 dwellings. The data shows that each site delivered in excess of 200 dwellings in some years although this was not sustained over a long period.</td>
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<td>6.13. Edgars consider that sustained delivery between 2021-2031 of over 200 dwellings per annum in a single strategic development location such as at Eynsham to be ambitious and up to 250 dwellings per annum overly ambitious.</td>
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<td>6.14. In the modified WOLP 2031, full delivery of the Eynsham Garden Village at 220 dpa is anticipated alongside delivery of 105 dpa at the West Eynsham SDA. In total this comprises between 275 and 325</td>
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6.15. Based on the above if an optimistic delivery rate of 250 dwellings per annum is adopted at Eynsham, across the Garden Village and West Eynsham SDA, then this would result in an under delivery of at least 550 dwellings across the plan period and around 700 dwellings if delivery at Eynsham is delayed to 2022/23.

6.16. The strategy to deliver all of Oxford’s unmet needs at Eynsham at two SDAs in close proximity is a high risk strategy and will mean that such needs are unlikely to be met in the plan period.

6.17. This risk can be off-set by including Oxford’s needs within the 5 year supply requirement and applying a 20% buffer (brought forward in the plan period).

6.18. Edgars consider that additional non-strategic sites should be allocated to frontload housing delivery, achieve a five year housing land supply in accordance with national policy and offset the likely under delivery at the Eynsham SDAs.

7. DELIVERY AT WEST EYNSHAM SDA (Policy EW1b, MM156 – 158)

7.1. Limited evidence has been published to demonstrate and assess the impacts of this proposed allocation. The previous assessment of Strategic Site Options (Examination Document Ref OTH1) has not been updated. This provided a comprehensive overview of site and a summary of strategic site constraints and impacts.

7.2. There would appear to be no evidence document which provides a summary of the West Eynsham SDA and its constraints. The SHELAA assesses a number of component sites but there is no expression of the overall size of the site, constraints, and its developable area to ascertain whether delivery is realistic.

7.3. The proposed SDA incorporates the provision of a new western link road to the village. This link road will be a major piece of infrastructure which will need to cross the Chill Brook and areas of flood plain. It is also proposed to join the B4449 by cutting across a Scheduled Ancient Monument.

7.4. It is unclear what consideration has been given to these constraints or any technical design or mitigation measures required, or any Flood Risk Assessment to address the Sequential or Exception tests. The updated Infrastructure Delivery Plan 2016 does not provide a cost estimate for the provision of the link road. It is unclear what has been assumed for viability purposes.

7.5. In Edgars opinion, the allocation at West Eynsham is not justified by the published evidence and there is a significant risk that it will not be realised as proposed.

8. DELIVERY AT EAST CHIPPING NORTON SDA (Policy CN1, MM138- MM140)

8.1. The East Chipping Norton allocation has been increased from about 600 dwellings at Tank Farm south of the London Road to 1,400 dwellings including 1,200 dwellings south of London Road and 200 north of London Road. The SDA now includes provision of an Eastern Link Road.

8.2. Limited evidence has been published to demonstrate and assess the impacts of the increased allocation. The previous assessment of Strategic Site Options (Examination Document Ref OTH1) has not been updated. This provided a comprehensive overview of site and a summary of site constraints and impacts.

8.3. There would appear to be no evidence document which provides a summary of the modified East Chipping Norton SDA and its constraints. The SHELAA assesses a number of component sites but there is no expression of the overall size of the site and its developable area to ascertain whether delivery is realistic.

8.4. Previous landscape evidence was prepared for the Council by Kirkham Landscape Planning, the Landscape and Visual Review of Chipping Norton Strategic Site Option [May 2014, Examination Document Ref...
LAN2). This concludes an indicative housing capacity for the land south of London Road of 500 dwellings within a similar area now proposed by the Council.

8.5. This is significantly lower than the 1,200 dwellings now assumed by the Council and draws into question the deliverability of this number of dwellings.

8.6. Furthermore, it is noted that the East Chipping Norton SDA now also includes provision of a link road through allotment garden land.

8.7. The updated Infrastructure Delivery Plan 2016 does not provide a cost estimate for the provision of the link road. It is unclear what has been assumed for viability purposes.

8.8. Edgars understands that the allotment land is under the ownership of Chipping Norton Town Council who object to the scale of development proposed. This draws into question the deliverability of the eastern link road which is now integral to the modified East Chipping Norton allocation.

8.9. In Edgars opinion, the increased allocation at East Chipping Norton is not justified by the published evidence and there is a significant risk that it will not be realised.

9. DELIVERY AT NORTH WITNEY SDA (Policy WIT2, MM97 – MM103)

9.1. The North Witney allocation has been increased from about 1,000 dwellings to 1,400 dwellings. 100 of these dwellings are now to be south of the Hailey Road adjacent to the Witney Primary School. Modified paragraph 9.2.45 indicates that the remaining additional 300 dwellings are to be accommodated through a modest increase in the extent of the developable area to the north and an increase in density.

9.2. Limited evidence has been published to demonstrate and assess the impacts of the increased allocation. The previous assessment of Strategic Site Options (Examination Document Ref OTH1) has not been updated. This provided a comprehensive overview of site and a summary of site constraints and impacts.

9.3. Previous landscape evidence was prepared for the Council by Kirkham Landscape Planning, the Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options (October 2012, Exam Doc LAN3). This concludes an indicative housing capacity for the land at north Witney of 750 - 850 dwellings within a similar area north of Hailey Road now by the Council. It is unclear how 1,300 dwellings can now be achieved within this area whilst being consistent with the Council's evidence.

9.4. In Edgars opinion, the increased allocation at North Witney is not justified by the published evidence and there is a significant risk that it will not be realised.

10. DELIVERY AT REEMA CARTERTON SDA (Policy CA1, MM 122 - 125)

10.1. Outline planning permission for this site was granted in 2005 (04/2358/P/OP) also setting out a series of design principles for future reserved matters schemes.

10.2. A reserved matters scheme for 225 dwellings REEMA North (all 3 bedroomed) was granted on 27th July 2011. A subsequent reserved matters application (11/0490/P/RM) for 200 dwellings (3 and 4 bed dwellings) was approved on 22nd May 2013. The net developable area noted in the application is 6.53 hectares and the density as 30.6 dwellings. The dwellings are required for service families.

10.3. These reserved matters applications had been discussed extensively with officers to ensure compliance with the approved design principles and standards. These applications have now lapsed and the Council indicate this is due to funding difficulties.

10.4. Main modification CA1 increases the proposed allocation for REEMA North and Central by 100 dwellings, the preceding modifications making clear this is expected to be delivered at REEMA North.

10.5. The two previous reserved matters schemes to provide service personnel accommodation were already
at a reasonable density of over 30 dwellings per hectare. To achieve 300 dwellings would require a density of 46 dwellings per hectare.

10.6. Edgars is not aware of any evidence that demonstrates that this is deliverable whilst complying with the establish design principles for the site and development which forms a positive addition to Carterton.

10.7. Edgars consider that only 200 dwellings should be assumed for REEMA North in accordance with previous detailed planning permissions.

11. CONCLUSION

11.1. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars on behalf of Rectory Homes Limited and a number of clients with development interests in West Oxfordshire.

11.2. Edgars object to the modified WOLP 2031 Policies H1 (MM24) and H2 (MM29 and 30) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy:

- The Five Year Housing Requirement – should include Oxford’s unmet needs
- Dealing with past shortfalls – should be based on the Sedgefield method
- Buffer – a 20% buffer should now be applied
- Supply – the supply is over estimated and should be discounted

11.3. Edgars conclude that when using robust assumptions in accordance with national policy and guidance that only a 2.7 year supply can be demonstrated.

11.4. Edgars object to the approach to the delivery all of Oxford’s unmet needs at Eynsham, in a single location, in the period 2021 – 2031 (Policy H1, MM24 and MM152 – 158). In Edgars opinion, concentrating all of the delivery of Oxford’s unmet needs in a single location is a high risk strategy due to the complexity and delays typically associated with such large scale development and the likely build out rate is untested and unrealistic. In Edgars opinion Oxford’s housing needs now form part of the five year supply requirement and non-strategic sites should be released now to address this requirement in a timely fashion.

11.5. Edgars also has concerns regarding delivery on other SDAs in the proposed modifications and that the this is not justified by the evidence presented. This includes:

- West Eynsham SDA (Policy EW1b, MM156 – 158)
- East Chipping Norton SDA (Policy CN1, MM138-MM140)
- North Witney SDA (Policy WIT2, MM97 – MM103)
- REEMA Carterton SDA (Policy CA1, MM 122 - 125)

11.6. Edgars consider that this provides additional justification for applying a 20% buffer to the 5 year supply requirement and that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply.

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| MM728 | Abbey Developments and David Wilson Homes Southern | - | 1669 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 30 | Policy H2 - Delivery of New Homes
Insufficient evidence has been provided to justify the use of the Liverpool method as opposed to Sedgefield and the draft Plan should be amended accordingly in terms of Policy H2. |
Main 25 - Policy H2 – Delivery of New Homes and Supporting Text

2.21 We have set out our comments in respect of the Council’s proposed housing target in relation to main modification 24 and as such do not repeat these here.

Sources of Supply

2.22 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED)

2.23 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period.

2.24 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

2.25 The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

2.26 The revised Policy as currently drafted states:

"With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards."

2.27 The NPPG is clear in its guidance to LPAs (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his
2.28 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

2.29 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.30 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.31 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.32 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

2.33 In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan
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| MM734         | vanderbilt Homes        | Vanderbilt Homes | -                | 1703       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 30 | period (Liverpool) as currently proposed.  

2.34 As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted in the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.  

Other Matters  

2.35 The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.  

Object MAIN 30 - amended Policy H2 how housing will be delivered  

Council’s agreed position in relation to Long Hanborough Station Inquiry  

At a current appeal at Land Adjacent to Hanborough Station, Long Hanborough (application ref. 15/03797/0UT and appeal ref. APP/D31/25/w/16/3148400) the Council have set out their current position in respect of a 5 year housing land supply, agreed within the Statement of Common Ground.  

In summary, the position is as follows:  

* Requirement 2016-2021 - 6,836  
* Supply - 4,514  
* Shortfall - 2,322  
* Years supply - 3.3yrs  

As of 11 November 2016, the Council do not have a 5 year housing land supply. A 3.3 year housing land supply is the current position.  

Council’s Approach to Meeting Housing Need  

The Council’s approach to meeting its housing need requirement relies on a combination of large existing commitments, small existing commitments and draft local plan housing allocations. We have concerns in relation to the first and last of these elements. In relation to existing large commitments, judgements have been made by the Council in their Housing Land Position Statement over the timeframe for deliverability of certain sites; particularly within the current five year period ending March 2021. We have significant reservations about the assumptions that have been made in respect of a number of sites including West Witney, land east of Carterton and east of Chipping Norton SDA, where
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<td>collectively the Council suggest 850 dwellings will be delivered by 2021.</td>
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The Council's reliance on these sites delivering the number of dwellings suggested is, in our opinion, unsound given the background to the sites concerned and the various deliverability issues. For example, the West Witney commitment has had considerable delays to the outline planning application and the Section 106 Agreement still has not been signed. There are major infrastructure requirements to address and to suggest that 350 dwellings will be delivered in the next 4.5 years is unrealistic.

The reliance on the deliverability of 'existing commitments' during the current five year period has the effect of distorting the Council's land supply position as well as rendering the proposed modifications to the Local Plan unsound.

With regard to reliance on draft Local Plan Housing Allocations, Paragraph 5.13 of the Council's Housing Land Supply Position Statement (Oct 2016) outlines that the Council, in response to the Inspector's concerns with how a significant increase in the overall housing requirement for the District will be delivered, have included a number of new site allocations.

Para 5.14 continues:

"Whilst these allocations remain in draft form at the present time and are subject to further consultation and discussion through the reconvened Local Plan examination it is reasonable to expect some additional housing supply from these sites in the period 2016 - 2021."

In seeking to demonstrate a 5 year housing land supply and meet the challenge of providing the requisite homes in the District, the Council have produced a series of allocated sites. The Council acknowledge they are draft and subject to further consultation and examination. In total, across the District, the non-strategic housing allocations total 1,719 (new para. 5.30b), or around 10% of the total provision for the plan period.

Taking together all proposed draft Local Plan housing allocations, strategic development areas and non-strategic allocations, this figure is 8,169 dwellings (including 2,750 dwellings for Oxford's unmet housing needs).

The Council acknowledge that "it is reasonable to expect some additional housing supply from these sites in the period 2016 - 2021", but does not expand on this claim any further. These are newly introduced sites which are only now undergoing public consultation and have not been subject to independent examination.

Given the nature of the modifications and the scope of what is proposed, it is likely there will be significant unresolved objections to the proposed site allocations. The Inspector may wish to recommend changes to the Plan once each site has been considered on its merits.

These sites have not yet been properly assessed. The allocations are at a very early stage of the plan-making process, undergoing the first stage of public consultation at the time of writing.
**Comment**

Paragraph 216 of the NPPF is explicit in setting out the degree of weight which should be given to relevant policies in emerging plans. Little weight should be afforded to these emerging policies.

Issuing a series of main modifications to a plan for public consultation which propose a series of draft site allocations for the first time is not an appropriate mechanism on which to rely for the purposes of adopting planning policies relating to housing deliverability.

The Council acknowledge that the "allocations remain in draft form" and will be "subject to further consultation and discussion through the reconvened Local Plan examination". 'Site Allocations' documents are commonly separate, detailed, stand-alone Development Plan Documents in their own right. They would undergo consultation and various drafts leading up to independent examination as they are adopted. Indeed, paragraph 5.30c the Plan states that "Subject to resources, the Council will seek to prepare site-specific planning briefs to guide the development of these allocated sites" (our emphasis).

The Council acknowledge that further work - including formal public consultation - will be undertaken in the future to understand the capacity and potential for housing delivery on these sites.

However, the Council have instead assumed each site will come forward and will deliver the level of housing stipulated by the proposed modifications, and have prepared policies on this basis.

Furthermore, paragraphs 5.34b and 5.34c discuss the Council's approach to calculating supply using the 'Liverpool' method. We do not consider this approach appropriate. There is a persistent past undersupply of housing delivery within the District which needs to be addressed now, and not spread out over the Plan period, and for this reason in this instance the 'Sedgefield' method is the most appropriate basis to address the shortfall.

The Council have made a series of assumptions in reaching the conclusion that the proposed main modifications to the Local Plan will meet the revised housing target for the District. It is circular reasoning to produce draft modifications for consultation yet to assume the requisite levels of housing delivery will be achieved, and it is for this reason we consider the Plan unsound.

Ultimately, we do not share the view that a 5 year housing land supply has been satisfactorily demonstrated, and it is not an appropriate basis on which to operate for decision-making purposes.

* It is not justified: a series of main modifications - which is in effect the first stage of public consultation on 8,169 homes on strategic and non-strategic allocated sites - is not an appropriate strategy on which to assume the District’s housing shortfall will be delivered, and to produce amended policy which flows from this assumption.

In summary, we are of the view the Plan is unsound because:
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<td>Strong objections are raised in respect of Paragraph 5.34B of the Plan and the intention to apply the Liverpool approach to dealing with backlog the of 1,836 homes. Applying the Liverpool methodology would not comply with the PPG which makes clear that dealing with backlog in the next five years is the preferred approach. Furthermore, delaying dealing with the backlog would be to reward failure, and would not be consistent with the Framework which requires boosting significantly the supply of housing now and not at some point in the future. The Council have chosen a strategy to deliver significant housing numbers through a range of Sustainable Urban Extensions. It is inevitable that these will not deliver quickly, through a combination of protracted planning process and the need to deliver infrastructure before housing. However, it is the Council that have determined the strategy and they could have elected to focus on an alternative strategy which delivered a greater number of smaller housing sites across key sustainable settlements in the District which would be an approach better able to deal with the significant backlog in a more timely manner and avoid the need to commit to the Liverpool methodology. It can be seen therefore that the Council have chosen a development strategy; the consequence is an inability to deal with backlog properly; and therefore has used the strategy decisions to argue against dealing with the backlog quickly at odds with the PPG and Framework. This is a significant issue since there are already considerable quantities of people on housing waiting lists and pent up demand in terms of seeking a home in the District, issues which will be perpetuated by the Councils chosen housing distribution strategy and consequential and inevitable commitment to the Liverpool methodology as a means to validate the approach. Further strong objections are lodged in respect of Paragraph 5.34D and the Councils desire to disaggregate housing land calculations for the purposes of five year housing land supply.There is no legitimate reason why this approach should be taken, it can draw no justification from the PPG or Framework, and is evidence of the Council seeking to avoid a commitment to delivery housing as quickly as possible.</td>
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<td>MM739</td>
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<td>Miss</td>
<td>Kateley</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Introduction We write on behalf of our client the Church Commissioners for England (the Commissioners) which manages a well-diversified investment portfolio to support the Church’s work across the country and is a long-term landowner in the West Oxfordshire area. We understand that the Council are currently consulting on the proposed modification to the Submission Draft West Oxfordshire Local Plan Local Plan 2031 Consultation.</td>
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The Submission Draft West Oxfordshire Local Plan Local Plan 2031 seeks to address the initial concerns raised by the inspector in December 2015 following the first Local Plan hearing which dealt with strategic matters. These concerns generally related to the overall housing requirement and deliverability of these sites. We recognise that in response West Oxfordshire has increased the total housing requirement to 15,950 homes, allocated new sites and increased the size of strategic sites.

We submitted representations in relation to the following five sites located within West Oxfordshire on behalf of the Commissioners to the West Oxfordshire Call for Sites in February 2016:

- Land North of Bampton
- Deanery Farm
- Church Close
- Land at Lower Farm Cottages
- Ansells Farmyard

All five sites are immediately available and are suitable for allocation. We understand these have not been included within the Submission Draft West Oxfordshire Local Plan Local Plan 2031 and instead there is a focus on larger allocations.

Housing

In terms of MAIN 30 Policy H2, the Commissioners recognises that there is provision to develop undeveloped land within or adjoining the built up area to meet the housing needs, however the policy refers to criteria in point 3 which has now been deleted. The previous text included under point 3 should be reinstated to make this policy sound.
available now and can deliver around 75 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. The following representations provide further information on the site at Churchill Road and should be read in conjunction with Edgars' general representations regarding housing supply which are not repeated here.

1.0 LAND NORTH WEST OF 34 CHURCHILL ROAD, CHIPPING NORTON

1.1 Our clients object to Policies H1 (Main Modification (MM) 24), H2 (MM29 and MM30) and CN2 (MM143) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that land at 34 Churchill Road and adjoining land to the north west should be allocated for around 75 homes to help address this deficiency.

Site and Surrounding Area

1.2 The site is situated in the south western part of Chipping Norton, which is the third largest town in the district offering both residents and visitors a good range of services and facilities. The site lies approximately 700m from the town centre and is a similar distance from Chipping Norton Leisure Centre and Chipping Norton School (secondary). There are bus stops located on Churchill Road (within 150m of No. 34 Churchill Road), which provide access to a high frequency service to Oxford (53) and a slightly less frequent service to Banbury (488). There is also a service (X8) that links Chipping Norton with Kingham Railway Station. The site is therefore in a highly sustainable location.

1.3 The site comprises approximately 4.5 hectares of land, identified on the plan attached at Appendix 1. The land forms part of the side of a valley and slopes downwards from the south east to the north west of the site. There is a two story dwellinghouse at 34 Churchill Road with vehicular access and egress to the front of the property via dropped kerbs in two locations. Access to the land at the rear (north west) of 34 Churchill Road is via an agricultural gate and grassed track situated between numbers 34 and 32 Churchill Road. The land north west of 34 Churchill Road is not currently actively used for agriculture, except for occasional grazing. Consequently, it could be described as unmanaged grassland, declining in quality. This land is divided into two parts, almost equal in area, by a tree-lined stream which runs from the site’s southernmost corner to its northernmost corner. The trees along this line are substantial and mature and are effective as a visual barrier.

1.4 The principal north-eastern and south-eastern site boundaries are shared with residential properties at The Leys and Lords Piece Road respectively. The rear gardens which back onto the site include considerable tree cover in the more Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation, December 2016 historic environment of The Leys. There is less tree cover in the 20th century residential development at Lords Piece Road which forms the more elevated backdrop to the site. There is a small group of industrial buildings, with a high number of trees in the curtilages, immediately adjacent to the site’s northwestern boundary along the route of a former railway line in the floor of the valley. The group contains some relatively modern structures, which are unremarkable, but among them sits Bliss Mill. This is an imposing 19th century building (now converted to apartments), Grade II* listed and a notable local landmark. Beyond the industrial buildings lies the Chipping Norton Regulated Pastures, which is common land with open public access for recreation. Open countryside lies to the south west of the site.
1.5 The site falls within the Cotswolds Area of Outstanding Natural Beauty, the Chipping Norton Conservation Area and the setting of the listed building (Bliss Mill).

1.6 The 'Cotswolds AONB Landscape Strategy and Guidelines' (adopted in June 2016) states in relation to 'Vale of Moreton Farmed Slopes' Character Area (in which the site is situated) that the expansion of existing settlements onto the Farmed Slopes is regarded as a local force for change, with a range of potential landscape implications including the 'encroachment of built development onto the Farmed slopes intruding into the landscape, particularly on the more prominent upper slopes'.

1.7 It is to be noted in this instance that the site does not occupy the uppermost slopes. The existing substantial tree cover, both on the perimeter and a belt running through the site, makes the land less visually prominent than the common land to the north west and the open countryside to the south west.

1.8 The Chipping Norton Conservation Area Character Appraisal identifies the bowl-shaped valley landscape setting of Bliss Mill as the most significant area of open space in the Conservation Area. While it is envisaged that within the Conservation Area the existing buildings, land uses, historic settlement patterns and open spaces should remain largely undisturbed, the guidance does enable development where views into and out of Chipping Norton, as well as views within Chipping Norton, are not harmed and where existing features of historic, visual or natural importance, such as trees, hedgerows, ponds, stone walls, paths and tracks are incorporated.

1.9 The site is not within an area that is at risk from flooding.

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation, December 2016.

1.10 The site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELAA).

Key Planning Site Considerations

1.11 Additional technical work, including a Landscape and Visual Impact Assessment is currently being undertaken and likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as relevant to the potential allocation of the site.

The principle of housing development at Chipping Norton

1.12 Chipping Norton is identified as a Main Service Centre in the Local Plan 2031. Draft WOLP Policy H2 permits new housing on undeveloped land adjoining the built-up area to meet identified housing needs. As such housing development on the site would be acceptable in principle.

1.13 Draft Policies H2 and CN2 seek to secure the delivery of 2,400 new homes focused on Chipping Norton. Delivery is proposed partly through a strategic mixed used development area of around 1,400 dwellings on the eastern side of Chipping Norton. The provision of an eastern link road is an integral part of the proposed Strategic Development Area (SDA).

1.14 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which is likely to result in
continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead in times of SDAs, addressing the current supply deficiencies is best achieved through allocating additional non-strategic developments such as Land at 34 Churchill Road and adjoining land to the north west.

1.15 In Edgars opinion, the development of Land at 34 Churchill Road and adjoining land to the north west can comply with Policy H2 in being adjacent to the built up area of a Main Service Centre in the settlement hierarchy. Settlement character, AONB landscape and Conservation Area

1.16 Draft Policy OS2Locating Development in the Right Places states that a significant proportion of new homes, jobs and supporting services will be

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation, December 2016 focused within and on the edge of the main service centres of Witney, Carterton and Chipping Norton. Development is required to:

- form a logical complement to the existing scale and pattern of development and/or the character of the area;
- Be compatible with adjoining uses and not have a harmful impact on the amenity of existing occupants;
- as far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s;
- be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities; and
- Conserve and enhance the natural, historic and built environment.

1.17 The site is surrounded on three sides by existing residential and industrial development. It is considered that allocating the site for housing would form a logical extension of the existing built-up area, without encroaching on the more visually prominent parts of the valley that would otherwise cause harm to the setting of Bliss Mill.

1.18 Use of the land for housing is entirely compatible with the adjoining residential development at The Leys and Lords Piece Road. The retention of existing trees and hedgerows, especially on the perimeter of the site, will help to ensure that there is no harmful impact on the amenity of the existing occupiers of properties in these two roads. It will also help to preserve and enhance the character and appearance of the conservation area.

1.19 A new all-purpose access road is capable of being provided off Churchill Road following demolition of the existing dwelling at No. 34. A 6.0m wide access road with 9.0m radii (like the Lords Piece Road/Churchill Road junction) with 2.0m wide footways each side would be constructed. Junction visibility splays of 2.4m x 43m are readily available in accordance with the 30mph speed limit on Churchill Road. An offset distance of 20m (centrel ine to centrel ine) would be provided between the new access and the cul-de-sac on the opposite side of Churchill Road, named Edward Stone Rise. This specification would facilitate a development of up to 150 dwellings. However, having regard to the importance and sensitivity of the landscape, the character and appearance of the Conservation Area and the setting of the listed building, it is considered that around 75 dwellings would represent a more appropriate scale of development for this site.
1.20 If the total number of dwellings on the site generated a need for a separate emergency access, this could be achieved by utilising existing rights of access to the gate in the northern corner of the site, from The Leys/Station Road. It would also provide an additional means of access for pedestrians and cyclists. In this manner, the development would be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities.

1.21 The character and appearance of the AONB and the Conservation Area can be preserved and enhanced through a high quality evidence based development within a strong and extensive landscape framework. While the extent of the land is 4.5ha, around 75 dwellings are proposed leaving significant scope for open space and landscaping.

1.22 In Edgars opinion, a development of this scale does not comprise ‘major’ development for the purposes of NPPF paragraph 116 and that a development within a strong landscape framework will not have a significant adverse impact on the landscape and scenic beauty of the wider AONB. The public benefits of the scheme would outweigh any harm to the Conservation Area and the setting of Bliss Mill.

1.23 Although further work is being undertaken, Edgars consider that development can be achieved on the site which makes an important contribution to meeting housing land supply in a sustainable location, without significant impact on the settlement character, AONB or the Conservation Area.

1.24 Further detailed technical information is likely to be available during the next stages of the WOLP 2031 Examination.

As above, we fully support proposed Main Modification 30, which sets out the District Council’s decision to meet the objectively assessed need for housing, as set out in the Oxfordshire Strategic Housing Market Assessment (March 2014). We further support the Council's decision to assist in meeting a part of the Oxford City unmet housing need.

In total, the West Oxfordshire Local Plan 2031 seeks to accommodate some 15,950 new dwellings in the period 2011-2031.

The significant increase in development needs to be accommodated has resulted in the Council needing to increase the scale of development on previously proposed allocated land, as well as identifying new sites. As set out in more detail below, we believe there is scope to increase the scale of development at East Witney, with development here being adjacent to the largest and most sustainable settlement in West Oxfordshire District.

We comment further on the revised sustainability appraisal below.

We do have concerns over the Council’s proposed intention to apply the Liverpool approach to meeting its backlog. This approach runs the risk of the District Council not meeting its overall housing requirement, with the backlog potentially not being met until 2031, or after. We would strongly recommend use of the Sedgefield approach, which would enable other sites to come forward earlier in the Plan period, increasing the likelihood of the objectively assessed need for the District being met in full, within the Plan period.

We note that in the final paragraph of the section of draft Policy H2 on Main Service Centres, the Plan states:
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<td>MM745</td>
<td>Gladman Developments Limited</td>
<td>Richard House (Gladman)</td>
<td>Mr House</td>
<td>1793</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>7.1 Policy H2 – Delivery of New Homes is proposed to be modified to the effect that the calculation of the Council’s 5 year supply of housing land will be undertaken applying the Liverpool methodology which provides for the backlog of housing to be delivered over the whole of the remaining plan period rather than in the first 5 years which applies under the Sedgefield methodology. This is surprising given the Council’s acceptance at a host of recent appeals, including Land off New Yatt Road, North Leigh and Land off Burford Road, Witney, that the Sedgefield methodology should be used to calculate housing land supply.</td>
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<td>7.2 Gladman maintains that the housing land supply should be calculated using the Sedgefield methodology. Gladman note the examining Inspector’s Preliminary Findings – Part 2 (IN016 dated December 2015), where it was set out whilst discussing the 5-year supply calculation in paragraph 2.14 onwards that: ‘National Guidance seeks any such shortfall to be made up in the next 5 years. On the Council’s own assessment of land supply this is achievable and so the Council accepts that an alternative approach could not currently be justified. If the housing requirement is increased, the shortfall will be greater and may need further action to address. The Council needs to have particular regard to National Guidance on this matter, as the “Liverpool method” (spreading the shortfall over the whole plan period) is not mentioned.</td>
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<td>7.3 The Sedgefield approach is the approach most commonly advocated by the Planning Inspectorate, as it is more closely aligned with the NPPF’s objective of significantly boosting the supply of housing (paragraph 47), by requiring any historic shortfall to be addressed within the first five years. This approach is also explicitly endorsed within the PPG (paragraph 3-035-20140306) which states:</td>
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<td>&quot;Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first five years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’. “</td>
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<td>7.4 The Liverpool (or residual) approach, where shortfall is made up over the full length of the plan period, has been supported in some instances, but only where there is evidence that past delivery has been restricted by housing moratoria or other constraints, and this is also referred to in paragraph 3-035-20140306 of the PPG. West Oxfordshire has never been restrained in this way and insufficient justification has been advanced to support this approach. Gladman would highlight that this approach does not appear to be consistent with the NPPF. Whilst neither approach is mentioned in the NPPF, it is clear that the emphasis is on meeting the housing need in full on an annual basis and as a minimum. It seems at odds with that approach to spread past housing delivery failure over a longer period into the future when it should already have been delivered. The undersupply is substantial and should be made up as soon as possible.</td>
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<td>7.5 Gladman would be strongly opposed to the inclusion of Oxford City Unmet Housing Need combined with the Liverpool Approach, as this would represent a double constraint to meeting housing needs. It should be borne in mind that any further delay in meeting the unmet housing need is failing those households who have needed both market and affordable homes since the start of the Plan period. It is important to remember that this is not just a theoretical mathematical exercise, there are households who need homes now so it is unreasonable to expect them to wait until later in the plan period before their housing needs are</td>
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<td>Mr</td>
<td>Dijksman</td>
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<td>Hallam Land Management</td>
<td>1810</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
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Delivery of New Homes (MM 29 and 30)

A key element in the testing of the soundness of the WOLP is whether the Plan as proposed to be modified, is whether the plan will ensure the delivery of the identified housing requirement set out in the Plan. This relates to the 15,950 dwellings proposed by 2031 and the obligation set out in the Planning Practice Guidance to ensure that there is a deliverable five year supply of housing land - facilitated by the Plan. The issue of five year supply is of considerable importance not least because of the possible reliance on the Council to resist further sustainable development options, if the outcome of the Local Plan examination was that the Council had established a position that it could demonstrate a five year supply of housing land. Hallam Land Management has been involved in a recent planning inquiry in relation to proposals for 91 dwellings plus care home and assisted living uses at Burford (APP/D3125/W/15/3139687). The outcome of the inquiry is awaited at the time of writing but involved inquiry sessions in November 2016 following the publication of the Councils Updated Housing Land Supply Position in October 2016. It is this update that the Council relies upon to support the conclusion in Main Modification 30 that the Plan and existing provisions will meet both requirement to meet housing needs over the plan period to 2031 but also the five year period to 2021. Having considered the Council’s evidence base in some detail, Hallam conclude that the Plan is not ensuring the delivery of housing needs in the District contrary to the assertions of the Council in the Main Modifications and in the evidence base. There are a number of reasons for which this include: -- the Councils suggested adoption of the "Liverpool method" for considering the substantial shortfall of housing;
In this circumstance, Hallam consider that it is important for the Local Plan to make additional allocations to realistically help ensure that the housing required to meet needs is delivered.

The allocations in the Plan do not achieve this objective (irrespective of their individual merits and suitability which, in Hallam’s view, also means that further allocations should be made).

In the following paragraphs, a summary of Hallam’s concerns regarding the deliverability of the Plan’s housing objectives is set out. Hallam would look to substantiate those views at the forthcoming resumption of the Examination.

Sedgefield v Liverpool approach.

In Main modification 29 and 30 the Council sets out a new approach - which is to adopt the Liverpool method for assessing five year supply.

While no detailed consideration was given to this issue in the first session of the Examination, paragraph 2.15 of the IN016 (the Inspector’s Preliminary Findings Part II) warns the Council that it should have particular regard to National Guidance on this matter, as the “Liverpool Method” is not mentioned”.

The Council have consistently used the Sedgefield approach to address the housing shortfall whereby the backlog of housing is met in the first five years of the plan period. The October Housing Land Supply Position Statement however sets out that the Council now believe that the Liverpool method is the most appropriate way of addressing the shortfall – over the plan period as a whole. MAIN 29 inserts text into the draft Local Plan that seeks to explain that the Liverpool method would place strain on the delivery of housing, meaning that in excess of 1,000 homes would need to be built in the first 5 years. MAIN 29 states that the Sedgefield approach ‘could only be achieved through by releasing a large number of sites that have been assessed by the Council as unsuitable for new housing’. This comment is not considered to be a valid reason for employing the Liverpool method as it is predicated on the Council having not allocated enough sites for housing rather than there being sites in the pipeline. There are clearly additional and sustainable opportunities that could come forward and help meet identified housing needs.

It is the Sedgefield method that is more with the NPPF, and paragraph 47 in particular which states that the shortfall should be moved forward from later in the plan period. The Planning Practice Guidance is clear. Paragraph Reference ID: 3-035-20140306 considers “How should local planning authorities deal with past under-supply?” The short answer given in the Planning Practice guidance is that: “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Co-operate’.”

The Guidance does not suggest an alternative to the Sedgefield approach. If the scale of the shortfall can’t be met within the first five years of the Plan then the solution is not to abandon the Sedgefield approach – or the attempt to meet needs that are urgent but to meet such needs as is possible and also to look to work with neighbouring authorities through the “Duty to cooperate”. This is not proposed by the Local Planning...
Authority.

It can make no sense to plan to meet housing needs that are assessed as having arisen between 2011 and 2016, and that haven’t been addressed in that period, at some undetermined point in the future - say 2026 - 2031. Deferring meeting needs is not consistent with the NPPF.

The Sedgefield approach is entirely consistent with the urgency stressed in the NPPF in relation to meeting housing needs because it seeks to ensure housing is provided as quickly as possible. It is unsurprisingly that appeal decisions have consistently employed the Sedgefield approach.

The fact that the Council has consistently applied the Sedgefield method, and this approach has been endorsed by Inspectors at recent appeals in the district (Burford Road, Witney), further illustrates the Council’s change of position as ill-judged. The October 2016 Housing Land Supply Position Statement sets out that the ‘validity of this approach will be debated through the Local Plan process’ however as it currently stands, the Council have provided no substantive justification for this approach. The Sedgefield remains the most appropriate method for addressing the shortfall, and given the significant shortfall and under delivery, the Council should accept this position rather than causing unnecessary delay to the delivery of much needed homes by not allocating enough sites to deliver the shortfall in the first 5 years. Adopting the Sedgefield approach, the Council accepts that it does not have enough land identified to meet housing requirements. This is not an acceptable approach given the scale of housing need and the large shortfall in meeting urgent housing needs.

5% v 20% buffer

The issue of the appropriateness of a 5% buffer was considered by the Local Plan Inspector in his preliminary findings in December 2015 (IN016). The conclusions were that delivery had been well below the local plan in recent years but that “it would not be reasonable to conclude, at present, that there had been persistent under-delivery”. This was because recent under delivery was partly excused by over delivery in the preceding 5 years against the South East Plan (and notwithstanding the limited provision that was sought in the SEP).

The Local Plan Inspector’s conclusions were both preliminary, and related to that point in time. Specifically, the Inspector pointed to circumstances where a 5% buffer should not be applied:

- “If delivery continues to be below that which is required, future decision makers may take a different view”;
- and moreover
- “the Council would be in a more robust position going forward if the plan creates a 5 year supply with more than a 5% buffer”.

Subsequently, Inspectors reaching decisions in respect of housing land supply in West Oxfordshire have opted to employ a 5% buffer.

Equally decisions have built on the WOLP Inspector’s conclusions by cross referring to the “tipping point implied in the Inspectors report” (when the adoption of a 20% buffer becomes appropriate).

With the publication of the Housing Land Supply Position Statement in October 2016 matters have now progressed further. The data profile has moved on six months and been confirmed. The completion of just 246 dwellings in 2015/16 represents another year of very substantial under delivery -since the Inspectors
initial conclusions. Moreover in the Main Modifications a new housing trajectory is proposed. Still no more than 515 dwellings are anticipated by the Council in the present year (2016-17) (NEF/App 12). The Council on its own figures therefore anticipates at least another year of under delivery.

In the light of this most recent evidence, and the sheer scale of the shortfall in delivery in the Local Plan period it would seem appropriate to reconsider the need to adopt a 20% buffer for the assessment of housing land supply and the plan period. By so doing, a robust approach can be adopted which will increase the options and choice for housing land to address the substantial under-delivery, and to reduce the risk of further shortfalls in delivery in the future. As it stands the Plan makes no provision for resilience.

Housing Supply

In its Housing Land Supply Position Statement (October 2016) the Council has comprehensively updated its estimate of the sites and other sources of supply that it considers will contribute towards meeting the need for housing in the five year period from 1 April 2016.

This responds to the expectation in Planning Practice Guidance that “Local Planning Authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out”).

In presenting updated information, the Council has taken the opportunity to reorganise its categorisation of its sources of supply. In so doing it is worth noting at the outset that the updating of the Council’s position has resulted in a limited increase in the Councils estimate of available supply only. Hitherto the Council suggested that some 4,067 dwellings could be completed in a five-year period from 1 April 2015. The Council’s estimate has risen to 4,514 only, in setting out updated evidence to a 1st April 2016 base date.

At the same time - as outlined above - the Council has accepted a significant increase in its estimate of OAN and there has been a very substantial rise in the already considerable backlog or housing shortfall in the plan period.

Existing Commitments

In Appendix 1 of the Housing Land Supply Position Statement, the Council includes a schedule of 43 sites, all bar two of which are expected to deliver at least 10 dwellings in the period 1 April 2016 to 31 March 2021.

Collectively, the Council expects some 2,740 dwellings to be delivered on these sites in that five-year period.

A number of these sites I have reviewed in my evidence to date. Others are advanced by the Council for the first time.

For a variety of reasons that the Council continues to considerably overstate the likely completions in this category.

First, now relies on a number of sites that have been granted planning permission at a point beyond the base date for the assessment (1st April 2016). Specifically, such sites include a number permitted on appeal, and a few permitted by the authority, well beyond the base date of the five-year supply assessment, for instance:

- Burford Road (Witney) [150 dwellings] -granted on appeal on 24 August 2016;
One of the major concerns of adding sites "post hoc", is that this results in a comparison between the claimed supply and the requirement that is a comparison of apples and pears. What the Council proposes is a comparison of the supply in October 2016 with the requirement on 1 April 2016. The Council's comparison fails to take account of what will inevitably be a further increase in the backlog/shortfall between April and October 2016 as completions continue to lag substantially behind the requirement. This applied also to the small site commitments 94 of which were granted after 1 April 2016.

Second, a number of sites relate specifically to C2 uses - in the form of care homes and extra care. These include Sites 2 and 3 - Coral Springs, Witney (155 units), Site 22 - Penshurst School, Chipping Norton (93 units) and Site 32 - Freeland House (40 units)

Third, there are specific concerns regarding a number of sites. For instance while the Council has downplayed considerably its expectations of North Curbridge (West Witney) and while the Council's Housing Land Supply Position Statement (October 2016), indicates that a full application for infrastructure has just been submitted and some pre reserved matters application activity has taken place, the position fundamentally remains the same - no permission has yet been issued with a section 106 agreement still to be signed. The slippage documented at the previous session of the Examination continues and extends. There is no certainty at the end of the day that it will be signed and completed, or when. As delay is built on delay, we are already six months into the five-year period from 1 April 2016. Even if the outline consent were to be issued now (and there is no evidence to suggest that it will be), infrastructure details have only just been submitted and there will be significant lead in time before commencement could begin on site. We consider that the Council’s estimate of 350 completions is highly optimistic.

Very similar circumstances prevail in relation to the land to the land east of Carterton 300 dwellings. A resolution to grant permission was obtained but this is now two years ago now. The Housing Land Position Statement October 2016 provides no significant update in relation to progress on the site. No further details appear to have been lodged. No evidence is provided of activity in moving the site forward. Reference to the site being in single ownership is made with the implied suggestion that this provides more certainty as to delivery. In reality, the site is controlled by a single developer - Bloor Homes - and the expectations of some 300 completions delivered on the site by 31 March 2021 - even if the section 106 were signed now are highly ambitious.

Draft Local Plan Allocations

The Council's latest evidence of supply continues to rely substantially on emerging Local Plan sites to deliver a substantial proportion of the required completions in the five years from 1 April 2016. In total some 1,035 dwellings are anticipated on 11 different sites comprising 23% of the Councils estimate total five year supply of 4,514 dwellings.

This is similar in scale to the 1,000 dwellings anticipated in the Council's previous Housing Land Supply Position (CD6.2). However, the composition of that supply has changed. Rather than some 1000 dwellings as previously assumed on four strategic sites - east of Chipping Norton, north of Witney, REEMA Central and
east of Witney - the Council has now recognised that no more than 281 dwellings might be anticipated on these four sites (of which 200 are anticipated on the land to the east of Chipping Norton SDA and 81 on REEMA north and central).

The vulnerability of the delivery assumptions in respect of land east of Chipping Norton was addressed in the first part of the examination. The Council's latest Housing Land Supply Statement (October 2016) recognises that this is a "large strategic site with potentially large lead in time" (page 75). The hope canvassed by the Authority is that some parcels e.g. the Pillars and the former Parker Knowle site might be capable of early release and had been subject to pre-application approaches.

However, no application was indicated in the October 2016 Position Statement and in any event the capacity of any such applications remains far from clear. It would seem most unlikely to amount to the 200 dwellings that the Council anticipates on the site in the five-year period (now 4.25 years away).

In the suggested Main Modifications to the Local Plan, officers are suggesting to the Council that the SDA east of Chipping Norton is substantially recast. It is to increase in size from 600 dwellings to 1400 dwellings and to embrace land now to the north and the south of the London Road. This will have significant new implications for the delivery of housing within the SDA. In particular, the implementation of the SDA now (it did not before) requires a new "eastern link road connecting the Banbury Road to the A4026/A361 via the London Road". The ability to deliver that essential infrastructure depends on land ownership issues ("the proposed eastern link road is likely to need to be routed across land in the ownership of the Town Council much of which is in use as allotments as well as areas of community woodland") with delivery and/or the planning of the delivery of that infrastructure likely to impact significantly on the ability to commence any development on the site;

In all such circumstances, and in the absence of any clear evidence to the contrary, the prospect of resolving the substantial range of issues prior to the commencement of any development on site in order to allow 200 dwellings to be on site in 4.25 years’ time seems remote.

With the exception of Site 48 (REEMA) all the remaining sites where the Council now anticipates housing completions by 2021 are sites that have been newly identified in the suggested Main Modifications.

In addition to evidence of suitability, it is necessary for the Council to demonstrate that the site is deliverable and that the new homes anticipated to be completed within five years is achievable. No evidence is presented within the Housing Land Supply Position Statement October 2016 that this is the case. Generally, and simply, it is suggested that the location is highly desirable and that there is evidence of developer interest. The submission of an application would be a demonstration of potential achievability and availability in a five year period yet in many cases that does not exist.

We are already 6 months into the five-year period. In the absence of a planning application now, availability can’t readily be established. Further, in the absence of an application now, it is difficult to imagine that there is any certainty that significant completions might be achieved in the remainder of the five-year period.

Summary and Conclusions in respect of Housing Land Supply

Drawing together the conclusions in respect of housing land supply and delivery in the Local Plan it is apparent that the Plans provision is unlikely to ensure the delivery of housing to meet housing needs. Moreover the assumptions made in seeking to demonstrate such a position fail to provide flexibility or seek
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<td>MM749</td>
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<td>Home Builders Federation Ltd Mr J Stevens</td>
<td>Mr Stevens</td>
<td>1828</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>to take a positive stance - for example by adopting a 20% buffer. In the light of the conclusions this element of the plan does not appear effective, justified or positively prepared. Additional allocations would contribute toward securing the soundness of the plan.</td>
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<td>Home Builders Federation Ltd Mr J Stevens</td>
<td>Mr Stevens</td>
<td>1829</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Elements of the policy are unsound because they are unjustified. On schemes of 50 or more dwellings, the Council wants at least 25% of all homes to be built to Part M4 (2) - accessible and adaptable homes. The policy states that it may require more than this. We have noted the report titled Supporting West Oxfordshire’s Aging Population (November 2012) has referred to the SHMA 2008 report that assessed that 14.3% of the households in the District included a member with a disability. While we consider that there is a reasonable case for a maximum of 25% we do not agree that the evidence supports a level of provision that is higher than this. 25% would appear to be the maximum level that could be justified. The report titled Supporting West Oxfordshire’s Aging Population (November 2012) records that the SHMA 2008 report assessed that 4.9% of households contained a member who was a wheelchair user. The requirement for 5% Part M4 (3) - wheelchair accessible homes on schemes of 50 units and more – seems justified in terms of need. However, the wording of the policy is a little confusing. The Council states that it will seek, as a minimum, the provision of at least 5% wheelchair homes. But it then says in the subsequent paragraph that the provision of wheelchair homes is “encouraged although it is not required by this policy”. It is therefore not entirely clear what the Council wants and how an applicant to respond to the wording in this policy. In terms of the viability of adopting these standards, unfortunately it is very unclear from the Local Plan and CIL Update Viability Study (February 2015) whether the Council has factored these costs into its assessment. We note pages 51 and 52 of the viability report. The Council initially used BCIS costs that were based on a five year sample. Paragraph 5.82 observes that this will have reflected the then current standard for energy efficiency which was Part L 2010. Part L of the Building Regulations has moved on since then and is Part L 2013 (which came into effect from 6 April 2014), so results based on this as a build cost would not necessarily provide a reliable picture of the cost of meeting the current Building Regulations. Secondly, we note in paragraph 5.87 that the Council has sensitivity modelled the cost of building to Code 5 to reflect the cost of building “over baseline Part L 2010”. Unfortunately, even Code Level 5 will not provide a reliable indicator of the costs associated with constructing to the new optional technical standard Part M4 (3) - wheelchair accessible homes. It may be adequate to cover the cost of building to Part M4 (2), but not for Part M4 (3). The cost of building wheelchair accessible homes is very expensive. The DCLG’s report that was published to inform the Housing Standards Review titled Housing Standards Review: Cost Impacts (DCLG, September 2014) places the cost of building wheelchair homes above the current Building Regulations and excluding additional space costs (associated with the Nationally Described Space Standard) as varying</td>
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Main Service Centres, Rural Service Centres and Villages

We support the inclusion of the words “or adjoining” the built up area. This should help to allow those settlements falling within this classification to allocate suitable sites through the neighbourhood planning process. However, there is no guarantee that neighbourhood plans will be produced, or in time, and the number of non-strategic allocations is very low. It is still unclear whether the distributed housing requirement in Policy H1 can be delivered if delivery on the strategic schemes falters. As a contingency, the Council should consider making more allocations at the villages using some of its windfall allowance. |

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| MM749         | Home Builders Federation Ltd | Home Builders Federation Ltd Mr J Stevens | Mr Stevens | 1828 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 30 | Elements of the policy are unsound because they are unjustified. On schemes of 50 or more dwellings, the Council wants at least 25% of all homes to be built to Part M4 (2) - accessible and adaptable homes. The policy states that it may require more than this. We have noted the report titled Supporting West Oxfordshire’s Aging Population (November 2012) has referred to the SHMA 2008 report that assessed that 14.3% of the households in the District included a member with a disability. While we consider that there is a reasonable case for a maximum of 25% we do not agree that the evidence supports a level of provision that is higher than this. 25% would appear to be the maximum level that could be justified. The report titled Supporting West Oxfordshire’s Aging Population (November 2012) records that the SHMA 2008 report assessed that 4.9% of households contained a member who was a wheelchair user. The requirement for 5% Part M4 (3) - wheelchair accessible homes on schemes of 50 units and more – seems justified in terms of need. However, the wording of the policy is a little confusing. The Council states that it will seek, as a minimum, the provision of at least 5% wheelchair homes. But it then says in the subsequent paragraph that the provision of wheelchair homes is “encouraged although it is not required by this policy”. It is therefore not entirely clear what the Council wants and how an applicant to respond to the wording in this policy. In terms of the viability of adopting these standards, unfortunately it is very unclear from the Local Plan and CIL Update Viability Study (February 2015) whether the Council has factored these costs into its assessment. We note pages 51 and 52 of the viability report. The Council initially used BCIS costs that were based on a five year sample. Paragraph 5.82 observes that this will have reflected the then current standard for energy efficiency which was Part L 2010. Part L of the Building Regulations has moved on since then and is Part L 2013 (which came into effect from 6 April 2014), so results based on this as a build cost would not necessarily provide a reliable picture of the cost of meeting the current Building Regulations. Secondly, we note in paragraph 5.87 that the Council has sensitivity modelled the cost of building to Code 5 to reflect the cost of building “over baseline Part L 2010”. Unfortunately, even Code Level 5 will not provide a reliable indicator of the costs associated with constructing to the new optional technical standard Part M4 (3) - wheelchair accessible homes. It may be adequate to cover the cost of building to Part M4 (2), but not for Part M4 (3). The cost of building wheelchair accessible homes is very expensive. The DCLG’s report that was published to inform the Housing Standards Review titled Housing Standards Review: Cost Impacts (DCLG, September 2014) places the cost of building wheelchair homes above the current Building Regulations and excluding additional space costs (associated with the Nationally Described Space Standard) as varying |
between £7,764 for a one bedroom flat up to £23,052 for a four bedroom detached home. The average is €16,779. These are considerable costs. The Council needs to factor these costs into its assessment as it could reduce how much money can realistically be collected through CIL or it could reduce the level of affordable housing provision.

We have considered the appendices to the Council’s Local Plan and CIL Update Viability Study but it is not clear from this report where this sensitivity analysis is located within the residential appraisal tables.

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| MM746         | Hallam Land Management  | Hallam Land Management | - | Hallam Land Management | 1843 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 30 | The guidance in the PPG concerning how local planning authorities should deal with past under-supply is unequivocal, and is that: Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’. (PPG, Paragraph:035 Reference ID: 3-035-20140306). The PPG does not therefore recognise anything other than the Sedgefield Approach to dealing with any housing backlog. Moreover, to do so would be inconsistent with provisions of the NPPF to ‘boost significantly’ the supply of housing pursuant to the core planning principle to proactively drive and support sustainable economic development to deliver, inter alia, the homes that the country needs. A backlog of supply implies a backlog of housing need, which in turn has implications for affordability and even homelessness. It is therefore imperative that any backlog is cleared as quickly as possible. That is particularly so in circumstances such as the current one where the housing delivery trajectory is already ‘back-loaded’ and the risks of slippage considerable. Spreading the backlog across the plan period will further backload the delivery trajectory, and increase the risk of carrying it forward into the next plan period with the implications for housing need and affordability. The Inspector has endorsed the need to follow the Sedgefield approach, advising the Council of the need to have particular regard to National Guidance on the matter, as the ‘Liverpool Method’ is not mentioned (IN 016, para. 2.15). Moreover, he made it clear that the 5% buffer should be applied to the shortfall in delivery during the plan period to date. He also considered it would be prudent for the Plan to create a five year supply with a buffer in excess of 5% to allow for any unexpected delays on some sites, and which would therefore result in a more robust position for the Council going forward (para. 2.14). It is therefore essential that the backlog is front-loaded and cleared within the first five years. The only alternative provided for in Government guidance is to work with neighbouring authorities to resolve it under the Duty to Cooperate. There is no evidence that the Council has attempted to do this. Even if the Council is correct that the consequence of applying the Sedgefield Approach would be the release of sites considered to be unsuitable for new housing, boosting significantly housing delivery is an imperative to which very great weight is properly given in the planning process, and is likely to override the objections to the allocation of less preferred sites that can make an early contribution to increasing the delivery trajectory. In considering which sites to allocate, the elimination of the back-log in the first five years should therefore feature prominently in the allocation strategy. Since the Council has chosen not to follow this approach, it ensues that its allocation strategy is flawed and should be revisited. In particular, it is likely to require allocation of smaller sites in areas which are currently a lower focus for growth. Since, having regard to the table of Adjusted Supply set out above, the Council is likely to be required to make significant additional provision for housing land, it will afford the opportunity to distribute more growth to smaller settlements and sites in the northern part of the plan area, that have the potential to deliver housing at an early stage in the
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| MM754        | Persimmon Homes Wessex  | Claire Hambleton| Ms               | 1893       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 30 | This modification states that the Council will apply the 'Liverpool' (residual) approach in calculating the five year housing land supply, whereby the past backlog of housing 'under-supply' which totals 1,836 homes in the period 2011-2016 is delivered over the whole of the remaining plan period (2016-2031) rather than the immediate 5 year period (2016-2021) which would be required under the alternative 'Sedgefield' methodology. Using the Liverpool approach is unsound. When determining whether there is a five year housing land supply in accordance with paragraph 47 of the NPPF, it is necessary to consider the extent to which there is any shortfall in delivery to date. The housing requirement covers the period 2011 to 2031 and any under-supply to the most recent update point when measured against the requirement must be included as part of the future requirement against which to measure the supply. The Sedgefield approach seeks to ensure that any shortfall in supply is made up within the 5 year period and therefore accords with the Government policy set out within the NPPF, to boost significantly the supply of housing. It also accords with the PPG at paragraph ID 3-034. If delivery has not been achieved at the rate expected then there must be a shortfall on the first date at which the five year supply is considered and that must be taken into account. The approach of utilising the residual, or Liverpool, approach to dealing with the shortfall to date would, in effect, be compounding past under delivery rather than boosting significantly the supply of housing in line with the NPPF. Therefore, the most appropriate method to accommodate past shortfall in West Oxfordshire Council is the Sedgefield approach. This modification should make clear that when a five year housing supply is not in place, the NPPF makes it clear that planning applications should be decided in light of the presumption in favour of sustainable development and that local plan policies relating to the supply of housing should be considered to be out of five year period following adoption of the Plan. There is no justification for not including the needs arising from Oxford City Council in the five year supply. They are part of the overall requirement for the plan period, and their exclusion from the five year supply currently exacerbates the back-loading of the delivery trajectory and the consequential enhanced risks of undershooting the requirement. There are again parallels between the current circumstances and those considered at the recent Plan Examination in North Somerset. In North Somerset the Council similarly argued that the 50% uplift in the housing requirement mid-way through the Plan period meant that the back-log should be spread over the plan period, not least having regard to the necessary elevation of delivery rates to unprecedented levels. The Examination Inspector held as follows: Regarding the Sedgefield approach, the plan period is already at its halfway point and the Weston Villages are shortly expected to make a significant contribution to housing supply. It is important that the under-supply that has arisen as a result of the increase in the housing requirement through modified Policy CS13 is remedied as soon as practicable. The Sedgefield methodology, which corrects the backlog within the first 5 years, is therefore the appropriate approach. Given the level of commitments that already exist, there would seem to be no reason why, subject to an appropriate allocation strategy, not least in terms of the residual requirement, the delivery trajectory cannot be escalated to respond to the backlog within the first five years, and without compromising the distribution strategy 'to steer a significant proportion of future development to the Witney, Carterton and Chipping Norton Sub-Areas'.
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<td>MM752</td>
<td>Bloombridge</td>
<td>Bloombridge</td>
<td>Mr</td>
<td>Cutler</td>
<td>1918</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Policy H2 - Delivery of New Homes</td>
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<td>Insufficient evidence has been provided to justify the use of the Liverpool method as opposed to Sedgefield and the draft Plan should be amended accordingly in terms of Policy H2.</td>
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<td>Main Modification 30 (Policy H2) should be amended to refer to an overall need for 16,510 homes in the plan period, including 13,760 homes to meet WODC need and that it will use the Sedgefield method to address the shortfall within the first 5 years of the plan period and that unmet Oxford City needs shall be incorporated into housing delivery from 2016 onwards.</td>
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<tr>
<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>1919</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Policy H2 - Delivery of New Homes</td>
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<td>MM759</td>
<td>Lincoln College</td>
<td>Lincoln College</td>
<td>-</td>
<td>Lincoln College</td>
<td>1949</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>The proposed modification appears to contain an error, the amenity criteria (point 3) have been deleted to avoid duplication with policy OS2, however the policy still makes reference to the deleted criteria.</td>
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<td>The modification seeks to rely upon the Liverpool method for addressing historic under-delivery of housing, deferring provision across the plan period. We disagree with this approach; the district and broader housing market area has a critical housing shortage. Each undelivered home represents an un-housed individual or family; it is clearly unacceptable for this to persist throughout the plan period and should be addressed as a priority. The Sedgefield method is the only way to ensure housing needs are reflective of the situation and to ensure policies are in place to address housing shortages as a matter of urgency.</td>
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<tr>
<td>MM761</td>
<td>R Jonas</td>
<td>Mr</td>
<td>Jonas</td>
<td>1973</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Main Modification 30 – Policy H2 – Delivery of New Homes.</td>
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<td>We note that the policy is unchanged in respect of determining new proposals for housing on undeveloped land. The policy states that:</td>
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<td>‘New dwellings will be permitted at the main service centres, rural service centres and villages in the following circumstances:</td>
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<td>• On undeveloped land within or adjoining the built up area, where the proposed development is necessary to meet identified housing needs and is consistent with the criteria in 3) below and other policies in this Plan, in particular Policy OS2.’</td>
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<td>We note that Main Modification 30 proposes that the residual (Liverpool) approach is taken to the delivery of</td>
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<td>MM762</td>
<td></td>
<td>N. Potter</td>
<td>Unknown Potter</td>
<td>Potter</td>
<td>1980</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>the backlog of housing, so that the backlog will be delivered over the whole Plan period, not, as the Sedgefield method proposes, over the next 5 years. It is suggested that the Plan should endeavour to clear the backlog of housing need as soon as possible, and that small sites such as Land East of Main Road, Stanton Harcourt, would provide the opportunity to deliver much needed housing now, contributing to clearing the housing backlog well before the end of the Plan period. Our client supports the Council's position that smaller 'non-strategic' allocations can help to ensure a deliverable housing supply in the short-term. Accordingly 15 'non-strategic' sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings. Of these 1,700 units, a delivery of circa 685 dwellings is anticipated in the immediate 5 year supply period (2016-2021, Main Modification 201 - Appendix 2: Housing Trajectory). In order that the Proposed Modifications enable the Council to meet its ambition of short term site delivery (Paragraph 5.30a), Our Client is of the view that additional 'non-strategic' housing allocations should be made at Paragraph 5.30b. This approach will allow for a more flexible approach to housing supply. In light of the Council's reported 5 year housing land supply delivery position set out by Main Modification 29 and specifically at Paragraph 5.34b, it is here (and at Main Modification 30) that the Council proposes to utilise the 'Liverpool' method in respect of meeting past backlog of housing under supply. The Inspector, in his Preliminary Findings Report – Part 2 (IN016, December 2016), commented: · On the basis of the plan's current requirement of 525 dwellings per annum there has already been a shortfall in delivery since 2011; · National guidance seeks any such shortfall to be made up in the next 5 years; · If the housing requirement is increased, the shortfall will be greater and may need further action to address; · The Council needs to have particular regard to National Guidance on this matter, as the 'Liverpool' method is not mentioned. The continued application of the 'Liverpool' Method is of concern. The application of this methodology is not considered 'sound'. The NPPG reports at Para 035 that 'local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible'. In this respect the Plan is not positively prepared or justified. The concerns previously raised by the Inspector are therefore shared and it is considered that the Sedgefield approach should be applied in order that a 'sound' Plan is prepared. The Council reports at Paragraph 5.34c that ‘insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to deliver a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing’. To ensure flexibility, increase short term delivery and assist the Council in rectifying its existing housing...</td>
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<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2007</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>supply shortfall it is evident that additional site allocations should be made. For this reason, we identify the land interest at Fawler Road, Charlbury as a developable site in accordance with Paragraph 47 of the NPPF.</td>
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<td>MM770</td>
<td>RJ Feilden Will Trust</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2026</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>This representation is made in respect of the sustainable settlement of Ascott under Wychwood, which is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text.</td>
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<tr>
<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2029</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>This representation is made in respect of the sustainable settlement of Long Hanborough, which is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text. L&amp;P objects to Main Modifications 15, 16, 27, 30 and 172 of the current consultation, as set out below.</td>
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L&P objects to Main Modifications 15, 16, 27, 30 and 172 of the current consultation, as set out below.

We object to specifying the residual (Liverpool) approach to the 5 year housing land supply in Policy H2, as this is contrary to the NPPF. The NPPF aims to boost significantly the supply of housing, in part by ensuring choice and competition in the market for land. To achieve this the NPPF specifies that

“Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply...”

With regard to the above point, we further note that paragraph 5.34d makes it clear that the housing target for Eynsham is to be ringfenced on the basis that the bulk of this is allocated for meeting Oxford’s unmet needs. We question whether this is consistent with the NPPF and its objective of boost significantly the supply of housing. |
We object to specifying the residual (Liverpool) approach to the 5 year housing land supply in Policy H2, as this is contrary to the NPPF. The NPPF aims to boost significantly the supply of housing, in part by ensuring choice and competition in the market for land. To achieve this the NPPF specifies that “Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply...”

With regard to the above point, we further note that paragraph 5.34d makes it clear that the housing target for Eynsham is to be ringfenced on the basis that the bulk of this is allocated for meeting Oxford's unmet needs. We question whether this is consistent with the NPPF and its objective of boost significantly the supply of housing.

Spitfire Homes supports the Council’s position that smaller ‘non-strategic’ allocations can help to ensure a deliverable housing supply in the short-term, providing a shorter ‘lead-in’ time to development in comparison to strategic site delivery. Accordingly 15 ‘non-strategic’ sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings. Of these 1,700 units, a delivery of circa 685 dwellings...
is anticipated in the immediate 5 year supply period (2016-2021, Main Modification 201 - Appendix 2: Housing Trajectory).

In order that the Proposed Modifications enable the Council to meet its ambition of short term site delivery (Paragraph 5.30a), Spitfire Homes is of the view that additional 'non-strategic' housing allocations should be made at Paragraph 5.30b. This approach will allow for a more flexible approach to housing supply delivery, required by the NPPF.

This is pertinent, in light of the Council’s reported 5 year housing land supply delivery position set out by Main Modification 29 and specifically at Paragraph 5.34b. It is here (and at Main Modification 30) that the Council proposes to utilise the 'Liverpool' method in respect of meeting past backlog of housing under supply.

The Inspector, in his Preliminary Findings Report – Part 2 (IND16, December 2016), commented:

* On the basis of the plan’s current requirement of 525 dwellings per annum there has already been a shortfall in delivery since 2011;
* National guidance seeks any such shortfall to be made up in the next 5 years;
* If the housing requirement is increased, the shortfall will be greater and may need further action to address;
* The Council needs to have particular regard to National Guidance on this matter, as the 'Liverpool' method is not mentioned.

The continued application of the 'Liverpool' Method is of concern to Spitfire Homes. The application of this methodology is not considered 'sound'. The NPPG reports at Para 035 that 'local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible'. In this respect the Plan is not positively prepared or justified. Spitfire Homes share the concerns previously raised by the Inspector and it is considered that the Sedgefield approach should be applied in order that a 'sound' Plan is prepared. The Council reports at Paragraph 5.34c that 'insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to deliver a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing'.

To ensure flexibility, increase short term delivery and assist the Council in rectifying its existing housing supply shortfall it is evident that additional site allocations should be made. For this reason, Spitfire Homes identifies its land interest at Standlake as a deliverable and developable site in accordance with Paragraph 47 of the NPPF.

Evidence Base: Strategic Housing and Economic Land Availability Assessment

Spitfire notes the very recent publication of the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA). Spitfire Homes’ interest is identified by site reference 158 (Malthouse Farm). An area of 6.44 hectares is reported. The SHELAA concludes that the site is available and achievable though not suitable for residential development. Spitfire Homes responds to specific extracts of the Council’s SHELAA through the following table (see original representations):

This representation is made in respect of Land between Witney Road and High Street, Finstock.

This site is Ref: 267 in the Strategic Housing Land Availability Assessment (SHLAA). The site lies outside the AONB. The owners of the site are willing to make the site available for housing development, as recorded in the SHLAA. We disagree with the assessment of suitability in the SHLAA for the reasons set out in Section 4.7.
Finstock is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. Our promoted site at Finstock would accord with the above criteria and we propose that the site is allocated to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text.

Land & Partners Ltd (L&P) is a privately owned development company which has identified this site as a sustainable location for development. L&P has reputation for engaging with the local community and securing high quality design, tailored to the local context. Negotiations are progressing with the landowners and the intention is to engage with residents and the Parish in early 2017.

Objection to Main Modification 30

We object to specifying the residual (Liverpool) approach to the 5-year housing land supply in Policy H2, as this is contrary to the NPPF. The NPPF aims to boost significantly the supply of housing, in part by ensuring choice and competition in the market for land. To achieve this the NPPF specifies that

“Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply...”

With regard to the above point, we further note that paragraph 5.34d makes it clear that the housing target for Eynsham is to be ringfenced on the basis that the bulk of this is allocated for meeting Oxford’s unmet needs. We question whether this is consistent with the NPPF and its objective of boost significantly the supply of housing.

Strong objections are raised in respect of Paragraph 5.34B of the Plan and the intention to apply the Liverpool approach to dealing with backlog the of 1,836 homes. Applying the Liverpool methodology would not comply with the PPG which makes clear that dealing with backlog in the next five years is the preferred approach. Furthermore, delaying dealing with the backlog would be to reward failure, and would not be consistent with the Framework which requires boosting significantly the supply of housing now and not at some point in the future.

The Council have chosen a strategy to deliver significant housing numbers through a range of Sustainable Urban Extensions. It is inevitable that these will not deliver quickly, through a combination of protracted planning process and the need to deliver infrastructure before housing. However, it is the Council that have determined the strategy and they could have elected to focus on an alternative strategy which delivered a greater number of smaller housing sites across key sustainable settlements in the District which would be an approach better able to deal with the significant backlog in a more timely manner and avoid the need to commit to the Liverpool methodology.

It can be seen therefore that the Council have chosen a development strategy; the consequence is an inability to deal with backlog properly; and therefore has used the strategy decisions to argue against dealing with the backlog quickly at odds with the PPG and Framework.

This is a significant issue since there are already considerable quantities of people on housing waiting lists and pent up demand in terms of seeking a home in the District, issues which will be perpetuated by the Councils chosen housing distribution strategy and consequential and inevitable commitment to the Liverpool
Further strong objections are lodged in respect of Paragraph 5.34D and the Council's desire to disaggregate housing land calculations for the purposes of five year housing land supply. There is no legitimate reason why this approach should be taken, it can draw no justification from the PPG or Framework, and is evidence of the Council seeking to avoid a commitment to delivery housing as quickly as possible.

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<tr>
<td>MM777</td>
<td>Hook, Nockles &amp; CALA Management</td>
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<td>2117</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Policy H2 relates to the delivery of new homes within the emerging plan period 2011-2031. Paragraph 5.34d states: “Furthermore the Council's assessment of 5-year housing land supply will treat the additional provision being made at Eynsham for Oxford City's housing needs (2,750 homes in the period 2021 - 2031) separately and the requirement will only form part of any five-year supply calculation that includes housing delivery assumptions from 2021 onwards.” It is accepted that the Eynsham garden village (as principally a stand-alone settlement) is intended to deliver units to meet Oxford City's needs. The intention to increase the OAN to meet those needs is commended. However, one queries the justification for the 1,000 dwellings on the western edge of the village (please refer to the representation in respect of Policy H1) to satisfy the same objective. The urban extension for 1,000 new dwellings has no direct relationship with Oxford. The basis on which this then satisfies the needs of Oxford City is questioned. Objection is also made over the delivery of 2,750 units within a ten year period. The proposed allocated sites at Eynsham would have to deliver 275 units per year, presuming delivery of that number started and were successfully completed in 2021. This position is strongly contested. Once land deals and equalization agreements are resolved, planning permissions gained and major infrastructure works are undertaken there is no scope for delivering the expected level of growth. CALA are aware of a recent report by Nathaniel Lichfield Planning that suggests that delivery of housing on strategic sites such as this will not normally exceed 150 dwellings per annum. In addition lead in times associated with large strategic sites can be found in the Hourigan Connolly, A study in respect of the delivery of urban extensions, page 58 (enclosed). The examples identify the average time period from submission of an application to a grant of outline planning permission is 34 months with legal agreements taking on average an additional 23.6 months to be resolved and Reserved Matters applications are usually dealt with in 6-9 months with the first units being delivered within 12 months of this approval. On average it takes 6.5 years once an outline application has been submitted for dwellings to be delivered on larger strategic sites. Therefore, new dwellings won't be delivered until the latter part of the Plan period. This is supported by one of the urban extension sites at Witney which from submission of the outline application has taken approximately five years to this point, and the section 106 is still yet to be signed. One would therefore suggest that a more reasonable timescale would be for the delivery of actual units to commence in 2024. To then build and sell 275 homes each year as currently proposed would mean completing effectively 138 dwellings on each site pa. Taking into consideration the potential lead in times there would actually only be a 7 year period to complete 2,750 dwellings for the urban extension at Eynsham and the new garden village. This would result in house builders having to deliver 393 dwellings across the two site. Applying a completion rate of 50 dwellings per annum per housebuilder that would mean having 3 housebuilders on land west of Eynsham, and then 5 housebuilders on the new Garden Village site for the last 7 years of the plan period.</td>
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Once again that is simply not a realistic assumption in both circumstances given the location of the urban extension (i.e. on the edge of a village) and the expectation for 5 housebuilders to operate on a single site. In fact it is totally at variance with the recent NLP report.

Indeed, one also questions the ability for 1,000 homes forming part of the urban extension to the existing village and the garden village allocation to both attract the level of market demand to sell that many units per annum even if both sites were ready to deliver 275 units pa from 2021. What justification can be provided to support that intention, mindful also of other strategic sites being promoted in closer proximity to Oxford?

The trajectory expected on some of the larger strategic sites is also questioned allowing for lead in times to obtain planning permissions, resolve equalisation agreements and sell land, discharge conditions and then put the relevant infrastructure in place. Once again there is considered to be an over expectation as to how many units can be completed each year based on levels of developer and market interest.

Therefore CALA suggest that additional land or sites need to be allocated to offset the failure to meet the necessary housing trajectory going forward. One site in particular that will help to plug the gap in housing delivery over the short term is land to the north of New Road, and between Station Road and Mount Owen Road, Bampton. It is identified in other representations, for example, to Policy H1 that the site is free of constraints (including any landscape and environmental designations) and is capable of delivering housing in the short term.

CALA support the inclusion of the wording within the second criterion to the Main Service Centre, Rural Service Centres paragraph within the amended policy H2. The policy quoted below now makes provision for smaller greenfield sites, such as land at Station Road and Mount Owen Road, Bampton, to come forward for development if the housing requirement is not being met. The suitability of the site and its delivery is set out in the representation made on behalf of CALA to Policy H1.

"Main Service Centres, Rural Service Centres and Villages

1. New dwellings will be permitted at the main service centres, rural service centres and villages in the following circumstances:

- On sites that have been allocated for housing development within a Local Plan or relevant neighbourhood plan;

- On previously developed land within or adjoining the built up area provided it is not of high environmental value (e.g. ecology) and the loss of any existing use would not conflict with other plan policies. This will include the provision of starter homes exception sites;

- On undeveloped land within or adjoining the built up area where the proposed development is necessary to meet identified housing needs and is consistent with the criteria in 3) below and other policies in this plan in particular Policy OS2."

The policy now supports development that adjoins the built up area provided that it is not of high environmental value and that the loss of any existing use would not conflict with other Local Plan policies.

CALA recommend that the reference within the Main Service Centres paragraph – quoted above should remove the reference within the third bullet point to “criteria 3)” as it has now been deleted within the main
In conclusion, Main Modification 30, relates to the 5 year supply in the context of Oxford City's needs. CALA Homes raises concern over the delivery of 2,750 units in the period 2021-2031 to meet Oxford City's needs. Indeed, it has been demonstrated that the average lead in time across the country for large urban extensions on average is 6.5 years with evidence of a large extension at Witney taking 5 years from submission to the final revisions of the s.106. Therefore it is not realistic to anticipate delivery at land west of Eynsham and the new garden village until 2024 at the earliest. In addition to the above, to then deliver 2,750 homes in a 7 year period across both the west of Eynsham site and the new Garden Village, this would result in land west of Eynsham having to deliver 143 dwellings per annum and the new Garden Village having to deliver 250 dwellings per annum. Applying a completion rate of 30 dwellings per annum per housebuilder that would mean having 3 housebuilders on the land west of Eynsham site, and then 5 housebuilders on the new Garden Village site. Such expectation of delivery is unsustainable and on this basis modification number 30 is deemed unsound.

CALA welcomes that greater flexibility is provided within Policy H2 to allow for development that adjoins the built up areas of Main Service Centres, Rural Service Centres and Villages providing it is not of high environmental value to come forward for development.

Overall, CALA are of the view that the Proposed Modifications to the emerging Local Plan cannot be declared sound in their current format.
West Oxfordshire will be met (excluding unmet need from Oxford City), as summarised in the table on page 6 of the attachment.

Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement for West Oxfordshire of 13,200 over the Plan period.

We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District, as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.

The NPPF makes clear that Local Plans “should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. There should be no delays to deliverability on any allocated site, in the context of a current 5 year housing land supply shortfall, and therefore reference to their delivery post-2021 should be deleted. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations.

Five Year Housing Land Supply

The revised Policy as currently drafted states: “With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards.”

The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

“...To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5 years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in
order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.

In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period [Liverpool] as currently proposed.

As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted within the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.

Other Matters

The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.

Overall Housing Number in the Plan

We support Main Modifications (MM) 22, 24 and 30 which propose that the Local Plan should provide for at least 15,950 homes in the period 2011-31, including 13,200 to meet the district’s needs and 2,750 homes as West Oxfordshire’s contribution to providing for Oxford’s unmet housing need.

Soundness Reason: Positively Prepared

WODC propose to use the figure of 660 homes pa as their OAN which is the mid-point figure in the SHMA.
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| MM788 | Mr Murray and Mr Blackwell | Mr Murray and Mr Blackwell | Mr | Murray and Blackwell | 2308 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 30 | This would be sufficient to support forecast economic growth and would help to meet affordable housing needs.  
(For information we do not accept Peter Brett’s rebuttal to our criticisms of the methodology used in the Oxfordshire Strategic Housing Market Assessment Partial Update. It remains our view that at least 598 homes p.a. are needed to meet the labour force requirement. It is not clear how WODC justify adopting the SHMA figure of 660pa as their OAN – presumably they have decided to uplift the number of homes Peter Brett identified as necessary to support economic growth to ensure new housing makes a significant contribution to the district’s identified affordable housing needs).  
The inclusion of 2,750 homes for Oxford’s unmet need is in line with the Growth Board’s apportionment of unmet need and reflects the terms of the Growth Board Memorandum of Cooperation1 signed by five of the Oxfordshire councils including WODC and the County Council. The figure has been tested at a high level through the post SHMA process and shown to be deliverable.  
Delivery period for Oxford’s Unmet Need sites and the 5 year housing supply calculation  
We support MMs 22, 29 and 30 which set out WODC’s proposal to use the Liverpool method to calculate their 5yr housing land supply figure and that sites for unmet need are unlikely to deliver housing until 2021 and therefore will not form part of the housing land supply calculation until 2021 onwards.  
Soundness Reason: Effective  
Use of the Liverpool method which spreads housing backlog across the whole plan period is a realistic approach, given the ambitious district OAN figure of 660pa and the scale of housing backlog in West Oxfordshire.  
The Growth Board apportionment is based on a common assumed start date of 2021 for the commencement of development. This assumption doesn’t preclude earlier delivery, but does recognise the complexity of the issues which need to be considered and factors in reasonable lead times to enable options to come forward and to be fully considered through the Local Plan and development management process. |
| MM791 | Greenwich Lane Owners | Greenwich Lane Owners | - | Greenwich Lane Owners | 2319 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 30 | 30. MAIN30: The proposed modification appears to contain an error, the amenity criteria (point 3) have been deleted to avoid duplication with policy OS2, however the policy still makes reference to the deleted criteria.  
31. The modification seeks to rely upon the Liverpool method for addressing historic under-delivery of housing, deferring provision across the plan period. We disagree with this approach; the district and broader housing market area has a critical housing shortage. Each undelivered home represents an un-housed individual or family; it is clearly unacceptable for this to persist throughout the plan period and should be addressed as a priority. The Sedgefield method is the only way to ensure housing needs are reflective of the situation and to ensure policies are in place to address housing shortages as a matter of urgency |
INTRODUCTION AND SUMMARY

i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Lagan Homes who have land under their control off School Hill, Minster Lovell. The land extends to 2.5ha and is identified on the plan attached as Appendix 1 to these representations.

ii. Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.

iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply.

iv. Land at School Lane is under the control of Lagan Homes, is available now and capable of delivering around 25 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing between 2016-2021 and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. Lagan Homes object to Table 4.1 and the reference to Minster Lovell 'south of the Burford Road' (MM14). There is no reason why Land at School Lane and north of the Burford Road is in anyway less sustainable in locational terms than other land on the edge of the village.

vi. The following representations provide further information on the Land at School Lane and should be read in conjunction with Edgars Limited’s representations regarding housing supply which are not repeated in detail in these representations.

1.0 LAND AT SCHOOL LANE, MINSTER LOVELL

1.1 Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that Land at School Lane should be allocated for around 25 homes to help address this deficiency.

Site and Surrounding Area

1.2 The site lies adjacent to the village of Minster Lovell and the B4047 Burford Road some 3 miles (5km) west of Witney and 4 miles (6km) north of Carterton. There is an off-road cycle path to Witney (within reasonable cycling distance) and an hourly bus service to Witney. The village also has a number of amenities including a small shopping parade, Post Office, Primary School, Public House and Butcher. There are also several businesses along the Brize Norton Road.

1.3 The site is a single 2.5ha open grassland field immediately north of the Burford Road and west of School Lane. It is part of the north facing slope of the Windrush Valley. A site plan is attached at Appendix 1.
1.4 The site lies some 1m below the Burford Road and is screened by a strong hedgerow along the road frontage such that the open nature of the site is not readily perceptible from this frontage.

1.5 On the southern side of Burford Road is some modern development which is also mostly set back from the road frontage. The White Hart Public House (Listed Grade II) along with the War Memorial and Methodist Church frame the Brize Norton Road junction opposite the site.1.6 There is a farm access in the south western corner and a strong hedgerow bounds to the west along with a Thames Water pumping station.

1.7 School lane bounds to the east. The lane lies some 1.5m below the site and views are filtered through by boundary vegetation.

1.8 School Lane leads to Little Minster. College Farm within Little Minster lies at the southern end of the site and there is a scattering of modern and historic buildings along School Land and School Hill.

1.9 School Lane and College Farm fall within a Conservation Area. A Conservation Area Appraisal has been prepared by the Council. The site is not identified in the appraisal as where there is a notable sensitive view into or out of the Conservation Area. Buildings adjacent the site are identified as Locally Listed including College Farm and the Old School.

1.10 The site forms part of the northern slopes of the Windrush Valley and falls within the Cotswold AONB. The West Oxfordshire Landscape Assessment (WOLA) identifies the site as part of the Upper Windrush Character Area and part of Semi-Enclosed Valley Side Farmland which is noted to be sensitive to views within an across the valley but where there may be limited opportunities to accommodate small scale development within a strong landscape structure. The settlement pattern identifies scattered villages along the valley with Charteville (New Minster) a notable exception being sited on higher land.

1.11 The site is well screened from the Burford Road, but there are some more immediate views through boundary hedgerows from School Lane. The site is appreciable but not prominent in middle distance views back from the opposite side of the valley just south of Ashhall Leigh. From here existing dwellings at Little Minster and north of the Burford Road are well screened by existing trees.

1.12 There is no planning history of direct relevance to the site. The site lies within Flood Zone 1 Low Risk.

1.13 Access is available to School Lane and to the Burford Road. Further technical work is underway to establish the most appropriate access point.

1.14 Lagan Homes have only recently acquired an interest in the site and as such the site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELA). Key Planning Site Considerations

1.15 Lagan Homes are in the process of undertaking technical and development design work to inform a planning application and this is likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as of particular
relevance to the potential allocation of the site.

The principle of housing development in Minster Lovell, north of the Burford Road

1.16 Minster Lovell is identified as a village in the Local Plan 2031. Draft WOLP Policy H2 permits new housing adjacent to villages to meet housing needs. As such housing development on the site would be acceptable in principle.

1.17 Draft Policies H2 and WIT4 seek delivery of 4,400 homes in the Witney Sub Area including Minster Lovell. Delivery is proposed through three Strategic Development Areas (SDAs - West, East and North Witney) each with strategic highway improvements. Land West of Minster Lovell is proposed for allocation confirming the suitability of the settlement for additional housing development.

1.18 There is residual windfall requirement of 304 homes within the Witney Sub– Area.

1.19 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which will likely result in continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead in times of SDAs, addressing the current supply deficiencies is best achieved through allocating additional non-strategic developments such as Land at School Lane, Minster Lovell.

1.20 Land at School Lane lies adjacent to Minster Lovell, close to amenities and public transport links. The village bus stops, public house and shops are located on the opposite site of the Burford Road to the site in very close proximity. The village school lies within 500m to the south. The site is also within cycling distance of the West Witney employment areas (2km) and Witney Town Centre (5km). In locational terms, it is sustainable. Indeed, the site lies closer to village amenities than the proposed allocation west of the village.

1.21 It is noted that Table 4.1 of the plan includes Minster Lovell as a village within the settlement hierarchy but this has been modified to (MM 14) to include reference to Minster Lovell ‘south of the Burford Road’. Lagan Homes object to this modification.

1.22 In Edgars opinion, the development of Land at School Lane and north of the Burford Road can comply with Policy H2 in being adjacent to a village in the settlement hierarchy.

1.23 There is no reason why land at School Lane, north of the Burford Road, is in any way less sustainable in locational terms than other land adjoining the village. Indeed, land at School Lane is in closer proximity to many of the villages amenities, including the school, shops and public house than other land on the edge of the village.

Village character, AONB landscape and Conservation Area

1.24 Draft Policy OS2 Locating development in the right places states that villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. Development should form a logical complement to the settlement pattern, protect landscape character and settlement identity.

1.25 The site does not appear to have been part of the historic Chartist settlement for which Minster Lovell is
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<td></td>
<td>Paul</td>
<td>Mr Hughes</td>
<td>289</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>Overall, I have no doubt that housing developers will be very happy with the extra allocation of houses and the fact that the overwhelming majority of land is greenfield. There are big profits to be made for house builders and land owners, many of which are the very wealthy Oxford colleges. However, although houses and infrastructure are needed the scale of development in only 15 years will transform West Oxfordshire and I fear not for the better. I doubt very much that the infrastructure, services and environmental improvements needed to keep pace with such large scale developments will be provided, let alone to a sufficient level to actually see an improvement to the lives of everyone in the area.</td>
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<td>MM61</td>
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<td>NP</td>
<td>Mr Pearce</td>
<td>544</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>MAIN 30, Para 5.38a Not sound So starter homes will be sold at no more than 80% of open market value, making them 8 times instead of 10 times the lowest incomes (see Para 2.19). Doesn't make much difference. And Figure 5.1 shows that Eynsham lies in a High Value Zone, which will remain so as prices rise to accommodate the extra people commuting to Oxford.</td>
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Council would expect an Area Action Plan for Eynsham and the Garden Village to be commenced at the earliest opportunity to take forward the delivery of these 'Strategic Development Areas'.

We support the use of the Liverpool method for determining a five-year supply outlined in clause 5.34b & H2. WODC will struggle to maintain a five-year supply as it is. The Sedgefield method is too punitive and after all, WODC traditionally over-delivered; only under-delivered because the target has been altered since the original Draft Local Plan as a result of external forces.

With regard to policy H3 & clause 5.50, we do not support the low affordable housing provision and lack of care for the elderly provision in low and medium value areas. Viability issues are understood, but we would like to see detailed figures before we are convinced. At the very least, in a District with an ageing population, housing for the elderly should be provided through all allocated sites.

Oxford Overspill and Eynsham
Regarding policies H1, H2 and clauses 5.14 & 5.19, we do not agree with the SHMA figures regarding the housing need of Oxford City. In particular the UPC is not properly understood and yet is used to justify most of the unmet need. The calculation is far too broad brush and simplistic to rely upon when setting targets that will have a major impact on the area for a significant period.

West Oxfordshire is expected to take 2,750 homes for Oxford, bringing the total to 15,950 or 800 per annum. Considering that the target suggested in 2011 was 300 per annum, this is an increase that presents a considerable challenge.

Oxford City has too many jobs for the number of people. Conversely, West Oxfordshire has too many houses for the number of jobs. The obvious and sustainable solution is to encourage more jobs in West Oxfordshire to balance the situation as opposed to building thousands more houses here, whilst encouraging jobs growth mainly in the City. It is unbalanced, illogical and unfair.

Also, it is not clear to us how hard the City is working to solve its own housing problem. The density of development is not that great at present. Is the City just sitting back and passing its problems on to the other districts? The population density in Oxford is about 23% of the density in parts of London.

As above, it certainly doesn’t make sense to plan for and allow 18% of workers created via the planned population growth here (equivalent to a significant 2,376 of the 13,200 houses in the Draft Local Plan), to commute to work in Oxford, in addition to building a new village to support Oxford’s unmet need (some 2,750 homes). This would seem to represent double counting, with over 5,000 more workers out-commuting in total over the Plan Period.

It’s debatable then whether WODC should have to contribute 2,750 homes to Oxford’s unmet need. So whilst Eynsham is the closest to Oxford and so perhaps the most obvious location, in our view the number of houses planned is too many. We are aware of City Farm in the area of the proposed Garden Village and would suggest at the very least that this area remains untouched in perpetuity and that protection is put in place.

The A40 has undergone improvements, which have helped, but queuing remains at peak times and starts a long way back from the Wolvercote roundabout. In our view, it’s not clear whether the extra traffic from the planned development at Eynsham as noted in clauses2.5a & 2.9, on top of the 18% of workers elsewhere in the District in existing and new households, can be accommodated and we are not aware of any detailed
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- **Comment**: Analysis in this regard. Should the said analysis exist, we would be happy to review it, but as it stands the ongoing A40 consultation gives limited information on the backup analysis. Buses may not help relieve traffic much as it depends where people work— not everyone will need to get to the City Centre, but elsewhere in the science parks for example. Certainly, the effectiveness needs to be proven. In any event, clauses 7.26 & 7.27b indicate that there is a funding shortfall for the A40. The reliance on developers noted in 7.28 would seem hopeful and we would question whether the funds expected from planned allocations will actually meet the shortfall.

- **Comment**: The OCC consultation on the planned improvements between Eynsham and Oxford clarify that car queuing times will not be reduced by the scheme, as traffic increases cancel out improvements. The A40 will therefore remain a misery for commuters even if improvements are made, underlining the fundamental lack of sense of encouraging outcommuting from West Oxfordshire to Oxford. The effectiveness of the park and ride will depend on how many people work on the bus route, which is not clear. We are also not sure whether WODC’s latest housing plans have been fed into the design for the A40.

- **Comment**: It is of note that clause 2.40 indicates that road deaths and injuries are worse than the national average in West Oxfordshire, indicating that we have a higher than average number of accident black spots and dangerous junctions.

- **Comment**: It is also of note that under policy E1 and clause 6.28, WODC seeks to allocate around 100Ha of employment land. This will accommodate around 7,500 jobs (based on 30 jobs per acre).

- **Comment**: Typically 50% of new jobs are on employment land and the rest are at existing premises. Therefore, about 15,000 jobs are catered for. As the total number of jobs expected is 7,900 under the SHMA, this seems excessive and inconsistent. In particular, it doesn’t make much sense to provide employment land at the Garden Village in Eynsham if that site is merely to meet Oxford’s unmet need for housing for its workers.

- **Comment**: One of the arguments we have heard repeatedly for the expansion of Oxford City is to allow the University to retain its position as a key player in research and innovation in Europe, as part of the so called ‘The Golden Triangle’ comprising Oxford, Cambridge and Imperial Universities. This sounds important, but we consider it a little elitist. These universities carry out important work for sure, but there are certainly excellent facilities for R&D all over the Country. As people who work in a technical industry, we have found that often other more pragmatic educational institutions provide more practical and so more useful services in terms of specialist research and testing. One of us is an Oxford science graduate, so we are not against the University (far from it), but we feel it should not expect its interests to affect the everyday lives of the residents of the whole County.

- **Comment**: Oxford University claims that it struggles to find and retain both technical staff and key support workers. We believe that the University could easily pay higher wages as part of the solution to its own problems. Furthermore, it makes no sense that the University is selling off land to private developers where almost certainly only a small proportion of the residents will end up working for the University.

- **Comment**: The University could instead develop the land and provide housing at low cost rent exclusively for its own (key) workers, if it chose to solve its own problems. The argument we have heard that selling the land to private developers is maximising revenue in line with Charities Commission Rules, only stacks up if the University considers short term revenue. If instead it focuses on long term sustainability, which includes financial stability, then investing in staff would be top of its agenda. In that scenario, a financial case can be
made for using land to provide its own housing. Certainly, without good people, the University will not flourish. Other major employers could also consider housing schemes. It is of note for example, that Christ Church College is known to have made a surplus of £20M from the land deal at Carterton East in West Oxfordshire and is now promoting other sites nearby. Should the University built 700 homes on a similar sized site for itself instead, it could expect to make a £7M profit on paper initially, in terms of the gap between build costs and housing value. However, the rest would be made over time in rent and increasing asset value ahead of inflation and in any event, the housing would help the University carry out important work. That sort of amount could be made on one project or one significant scientific breakthrough. Also, the type of housing the University needs could probably be built at higher density, so the site could take more than 700 units (say 900) with the same land take, if flats and small homes were the focus (albeit that some family housing will be needed).

This would make the site most effective in terms of solving a specific problem in the County. Every site should be made to work hard at what is actually needed to ensure land is not wasted.

The planned road link between Oxford and Cambridge will naturally pull growth eastwards rendering West Oxfordshire further away from the zone of influence.

Finally, on a personal note, we were disappointed by how Oxford City’s barrister attacked WODC during the first round of the Examination. He showed no sign of respecting the District and demonstrated that any co-operation just involves the District doing what the City wants. It was an eye opener regarding the lack of genuine two-way collaboration and therefore makes the allocation of 2,750 homes to this District help out the City a bitter pill to swallow.

The reference in the final bullet to H2 (1) to 'criteria in 3 below' should be removed as the criteria and section 3 have been removed. The final bullet should instead clarify that the need to meet identified housing needs shall not be a justification where the policies which are identified in footnote 9 of the NPPF require that it is not. This is required for the plan to comply with the NPPF.

The Cotswolds Conservation Board wishes to reiterate its recommendations (copied below) made at the Publication Stage in respect to this policy. The Board does not believe that the proposed modifications address our previous comments in respect to Paragraphs 115 and 116 or Paragraph 14 of the NPPF. As a result the Board continues to be concerned that the plan does not take full account of the need to conserve the landscape and scenic beauty of the AONB as per its Section 85 duty under the CRoW Act 2000.

"The Policy at present does not refer specifically to Paragraphs 115 and 116 of the NPPF (and see separate comments in respect of Paragraph 14 Footnote 9).

The only reference to AONBs within Policy H2 is within section 3 that states "where acceptable in principle." There has to be a step back from this stage to be compliant with the tests of Paragraphs 115 and 116 of the NPPF in specific relation to AONBs as this may rule out sites as being "acceptable in principle" in the first place.

Add an additional category to Policy H2 (1) and (2):
1. New dwellings will be permitted at the main service centres, rural service centres and villages in the following circumstances:

* Where sites are within or within the setting of the Cotswolds AONB, only when compliant with the requirements of Paragraphs 115 and where relevant 116 of the NPPF and in consideration of the purposes of Section 85 of the CRoW Act in relation to the conservation and enhancement of the nationally protected landscape.

and repeated again in respect of section (2):

2. New dwellings will be permitted in the small villages, hamlets and open countryside in the following circumstances:

* Where sites are within or within the setting of the Cotswolds AONB, only when compliant with the requirements of Paragraphs 115 and where relevant 116 of the NPPF and in consideration of the purposes of Section 85 of the CRoW Act in relation to the conservation and enhancement of the nationally protected landscape.”.

### Table 1: Respondents' Comments

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<th>Respondent Title</th>
<th>Comment ID</th>
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<tbody>
<tr>
<td>MM388</td>
<td>Ainscough Strategic Land</td>
<td>Ainscough Strategic Land</td>
<td>-</td>
<td>Ainscough Strategic Land</td>
<td>B67</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
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3.22 One of our gravest concern relating to the housing delivery strategy for the Local Plan is in relation to the high reliance on large strategic sites as listed in MM27. Whilst we do not object to the principle of the development locations per se, we do raise issues with the delivery that is expected from these sites over the plan period and in some cases, the physical capacity for them to deliver the targets suggested.

3.23 Indeed, the Council imply at paragraph 5.25 of the modified Local Plan that past completions have been low because of the lack of urgency from the development sector to bring strategic sites forward. The reality is strategic sites simply take time to properly plan and deliver, principally because their impacts are exponentially greater, they need thorough consideration, and the complexity of land ownerships and scale inevitably result in longer lead in times that those experienced with smaller, more moderate sites.

3.24 As set out in Table 3 below, SDAs are to provide 42.0%, 58.3% and 58.1% of the total number of homes required in the Witney, Chipping Norton and Eynsham-Woodstock sub-areas. This strategy needs to be considered with considerable caution. Should any of the SDA encounter delay to their delivery, these sub-areas and the district as a whole would not meet the housing requirement over the plan period. This is particularly pertinent in the case of Witney and Carterton where there are two very large commitments already which not listed in the table below (ATTACHED)

3.25 Table 4 (ATTACHED) identifies the five SDAs within the district and the number of homes they are expected to deliver over the plan period based on the Council's trajectory.

3.26 Understandably, the overall housing requirement from each of the five SDAs will only be achieved at the very end of the plan period. Thus, should the delivery of one or more SDA slip by just one or two years the plan will fail to meet its housing requirement over the plan period. This is not implausible given the complexity of delivering these SDAs, which we address in more detail in Section 4.

3.27 In order to explore delivery rates from large scale site such as the SDA's identified in the Local Plan, it is important to be aware of the following three reports / assessment, which are all based a large amount of empirical data:
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<td>* A Report into the Delivery of Urban Extensions (Hourigan Connolly, February 2014) (Appendix 1)</td>
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<td>* Urban Extensions, Assessment of Delivery rates (Savills, October 2014) (Appendix 2)</td>
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<tr>
<td>* Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? (NLP, November 2016) (Appendix 3)</td>
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3.28 The Hourigan Connolly report on the delivery of urban extensions highlights the difficulties and time it can take to bring forward such sites. It is worth highlighting the following key factors as reported in Section 15 of that document, namely the average times for the various stages of the planning process. These are:

- Average timescale from submission to grant of outline planning permission is 34 months;
- Average timescale for signing a legal agreement 24 months; and,
- Reserved matters applications 6-9 months.

3.29 Subsequent to that report, the Savills report looks at urban extensions and their delivery rates. In terms of lead-in time the report is clear that a period of 3-4 years from the determination of an outline planning application to the completion of site preparation and the delivery of housing is a realistic average time scale for the delivery of housing. The study notes that sites which have particularly complex land packages and or significant strategic infrastructure to deliver can take significantly longer than estimated. The report lists examples of sites where Section 106 agreements in themselves have taken 64 months to agree, with the average being 14 months.

3.30 The Savills report goes on to consider how fast a major site may build out. On average it found that in the first year of construction a site delivered 65 units, this increased to 110-120 dwellings per annum in subsequent years, before dropping towards the end of the life cycle of the development. These rates are obviously averages and dependant on a range of factors, however the report makes clear that any spikes on sites considered within the report were down to very specific delivery factors e.g. the need to deliver a large lump of affordable housing in one go due to the funding requirements of a partner.

3.31 The NLP report relates to housing delivery and assesses 70 large schemes (500 homes +) which have come forward in the last 20 years, and 83 smaller sites (50-499 homes). The report commented on average delivery from conception to start on site looking at:

- Lead in time prior to submission of an application;
- Planning approval period; and,
- Annual build out rates.

3.32 The average lead-in time for large sites is identified by NLP as 3.9 years (i.e. from the point a site is first identified in a Local Plan).

3.33 The planning approval period is measured from the validation date of the first application for the proposed development. The end date is the decision date of the first detailed application which permits the development of dwellings on site. The planning approval period of all sites, both large and small, is identified by NLP as:

- 2.8 years (0-99 homes)
- 4.1 years (100-499 homes)
- 5.3 years (500-999 homes)
- 5.6 years (1000-1499 homes)
3.34 NLP also identify the annual build-out rate falls within the overall build period of each site. The annual build out rates are influenced by the size of the site and NLP arrives at the following:

* 27 dwellings per annual (dpa) (0-99 homes)
* 60 dpa (100-499 homes)
* 68 dpa (500-999 homes)
* 105 dpa (1000-1499 homes)
* 135 dpa (1500-1999 homes)
* 161 dpa (2000+ homes)

3.35 There are clear comparable and a common theme running through each of the three assessment (i.e. large sites take time to delivery).

3.36 Given NLP’s assessment is the most recent, we have considered the trajectory from each of the West Oxfordshire SDAs using the two different variables (build out rates and lead-in times). Under each scenario, the full delivery of the 6,450 homes identified within the SDAs are not delivered during the plan period resulting in a shortfall in the delivery of the housing requirements of the district ranging from 2,210 to 2,311 homes.

3.37 Table 5 (Attached) applies the NLP lead-in time to the Council’s build-out rates, and identifies that the Chipping Norton, Garden Village and West Eynsham SDA would not be delivered in full during the plan period, resulting in an overall shortfall of 2,210 homes over the plan period.

3.38 Table 6 (Attached) applies both the NLP build-out rates and lead-in times from first identification of the SDA, and identifies that only the East Witney SDA would be delivered in full during the plan period, resulting in an overall shortfall of 2,311 homes over the plan period.

Conclusions Applying NLP Recommendations on Delivery

3.39 Whilst applying the NLP assumptions is a theoretical approach to identifying the delivery of the five SDAs over the plan period, the assumptions are based on empirical data from a large number of development proposals. As such, it cannot be dismissed out of hand. However, we do recognise that the there is a need to consider the specific circumstances in relation to West Oxfordshire and each of the SDA sites identified. Nevertheless, the above exercise clearly demonstrates that the Council’s trajectory certainly needs to be considered with significant caution.

3.40 We go on to present our own view and final position on the Council’s trajectory / delivery from the SDA’s in Section 4 having reviewed each of the sites in more detail including their ability to accommodate the suggested number of dwellings. Following this analysis is our final position that is out in Table 7 below (Attached).

3.41 As per the NLP analysis, we agree that East Witney will be completed. We have some genuine concerns over the delivery of the West Eynsham site for a range of reasons but ultimately conclude that this site could potentially be complete within the plan period. However, we take greater issue with the ability for the following three SDAs to deliver within the plan period for reasons set out below and conclude/calculate a
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>4.70 The results of our own assessment as set out above identifies that over the plan period when solely considering the delivery of the SDAs, the delivery would amount to 4,380 as set out in Table 9 below (Attached). The result is that there will be a shortfall of at least 2,070 units over the plan period compared to what the Council currently anticipate from the SDAs. This is not entirely dissimilar to the NLP analysis but is more favourable than if we applied the NLP analysis alone.</td>
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<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 30</td>
<td>2.23 We have set out our comments in respect of the Council's proposed housing target in relation to main modification 24 and as such do not repeat these here. Sources of Supply</td>
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<td>2.24 The supporting text to Policy H2 sets out the various sources through which the housing requirement will be met, as summarised in the table below (ATTACHED)</td>
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<td>2.25 Clearly the Council are already failing to plan for sufficient new homes to meet the housing requirement over the Plan period.</td>
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<td>2.26 We do note that currently no allowance is made for additional allocations which could be brought forward through Neighbourhood Plans of which there are currently five in preparation in the District as well as the made Chipping Norton Neighbourhood Plan, which does not seek to allocate any sites for development. Whilst additional development could be forthcoming through allocations in Neighbourhood Plans there is no guarantee that this will occur.</td>
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<td>2.27 The NPPF makes clear that Local Plans &quot;should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.&quot; As currently drafted the Local Plan is failing not only to make provision for its own acknowledged objectively assessed need but allows for no flexibility to ensure the housing target is achieved. Concern is therefore raised that the Plan as currently drafted is not positively prepared, justified, effective or consistent with National Policy. Further consideration is likely to be required as to how this requirement can be met, including through additional allocations. Five Year Housing Land Supply</td>
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<td>2.28 The revised Policy as currently drafted states: &quot;With regard to 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031. The additional provision being made for Oxford City’s needs will be incorporated into housing delivery assumptions from 2021 onwards.&quot;</td>
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<td>2.29 The NPPG is clear in its guidance to LPA’s (D 3-035-20140306) that they should aim to deal with any undersupply within the first 5 years of the plan period where possible. The</td>
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shortfall of 1,784 dwellings from these SDA’s over the plan period:

* Chipping Norton SDA – not capable of accommodating the number of homes proposed;
* North Witney SDA – will not commence or deliver at the rate the Council anticipate; and,
* Garden Village SDA – will not commence or deliver at the rate the Council anticipate.
NPPG makes clear that in circumstances where the LPA is unable to meet its undersupply in the first 5 years then it will need to work with neighbouring authorities under the ‘Duty to Cooperate.’ This matter was specifically raised by the Inspector in his Initial Findings: Part 2.

2.30 Proposed paragraph 5.34c seeks to justify the Council’s proposed approach by advising that:

“To provide a 5-year supply under the Sedgefield method, in excess of 1,000 homes per year would need to be built consistently over the next 5-years, well in excess of what has been achieved in West Oxfordshire in the past, even during several housing booms. Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to achieve a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward and that addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.”

2.31 As is clear from the extract above the NPPG clearly advocates the Sedgefield approach as the most suitable approach. This is borne out in numerous appeal decisions and case law. Where the Sedgefield method cannot be achieved then the LPA must seek to liaise with neighbouring authorities under the Duty to Cooperate in order to redistribute this requirement. Although the Council have sought to justify its decision to seek to pursue the Liverpool method, no indication is provided as to whether the approach advocated in the NPPG of seeking the assistance of neighbouring authorities to meet this shortfall in the short term has been pursued.

2.32 Given the discussions which have taken place in respect of the Oxford City apportionment, and the fact that full agreement has yet to be reached on this matter, it would appear unlikely in any event that such assistance would be forthcoming.

2.33 Given our comments above it is clear that the Council will need to propose additional allocations in order to meet the housing requirement. Given the shorter lead in times associated with small to medium size allocations it is likely that allocations of this scale would allow the Council to also address its backlog using the Sedgefield approach. Consideration should also be given to whether elements of the larger strategic sites could form an early phase of development without compromising the comprehensive development of the wider site.

2.34 Whilst the Council seeks to justify the use of the Liverpool method by referring back to past delivery rates, it must be recognised that these were set within a significantly different planning context when there was not the requirement as set out within the NPPF to meet the full objectively assessed need. The historic low levels of delivery are a reason to boost the supply of housing as soon as possible because the need has already arisen and has not yet been met, rather than being a reason to suppress the rate at which housing should come forward.
2.35 In light of the above, in order to ensure its soundness the Plan should make provision to meet the backlog in housing need using the Sedgefield method with the backlog delivered in the first five year period rather than being spread across the remaining Plan period (Liverpool) as currently proposed.

2.36 As currently drafted it is unclear whether the Council are proposing that post-2021 the supply of those allocations identified to meet the needs of Oxford City only would be accounted for, and that the additional 2,750 dwellings would not be added to the requirement side of the five year housing land supply equation. Plainly such an approach would be unsound and the Inspector in his preliminary findings advised that the apportionment figure should be counted within the five year housing land supply. As such we would recommend that the policy text is re-worded to clarify this position.

Other Matters

2.37 The previously proposed criteria in point 3 of the policy are proposed to be deleted and instead are addressed in Policy OS2 as discussed above. With regards to the Main Service Centres etc., the Policy wording in the third bullet continues to state development will be allowed where “it is consistent with the criteria in 3) below”. For clarity this wording therefore requires amendment.

So starter homes will be sold at no more than 80% of open market value, making them 8 times instead of 10 times the lowest incomes (see paragraph 2.19). Doesn’t make much difference. And Figure 5.1 shows that Eynsham lies in a High Value Zone, which will remain so as prices rise to accommodate the extra people commuting to Oxford.

As a reflection of the overreliance on large site allocations to meet its housing requirement detailed above, the implications are that having reviewed its housing trajectory, the conclusion is that it is unrealistic to boost significantly the supply of housing in the short term and as such, looks to resolve the issue by spreading the existing backlog of housing supply over the whole of the remaining Plan by using the ‘Liverpool’ method. This is on the basis that the Council claim at paragraph 5.34c that insufficient sites have been identified to provide sufficient supply to deliver a 5-year supply under the ‘Sedgefield’ method.

Reference is made to paragraph 2.15 of the Inspector’s Preliminary Findings Part 2, where it is highlighted that National Guidance seeks any such shortfall to be made up in the next 5 years. Furthermore, the Inspector made reference to the Council’s own evidence which suggests this is achievable and that as such, an alternative approach (i.e. the Liverpool method) could not be currently justified. Whilst the housing requirement has increased, 2,750 is proposed to be ‘delayed’ until 2021. We would question whether it is therefore unrealistic for the residual increase and it impact on the 5-year supply to be so significant as to warrant use of the Liverpool method, particularly in light of the Council’s recent approach to planning applications on unidentified sites and those recently granted at appeal which would indicate that there is further capacity to suggest that an uplift in delivery over the next 5 years is a realistic proposition, particularly if these are smaller sites in some of the more sustainable Villages such as Enstone where demand is high.
The Council’s Proposed Use of the Liverpool Methodology

We strongly object to WODC’s proposed use of the Liverpool methodology towards assessing housing land supply matters. This method seeks to spread the delivery of a backlog of required housing, that has previously accumulated, over the whole plan period. The basic problem with the approach is that the needed housing that has already accumulated because of a past failure of delivery is not in fact theoretically met in full until the very end of the plan period with a consequential failure to boost the delivery of housing and an inherent failure to address the first five years of need with a sufficient supply (as there will already be an unmet backlog that continues throughout that period).

The far more common approach is the ‘Sedgefield’ method. This requires authorities to meet an already acquired shortfall in the first five years and is consistent with the overall thrust of the NPPF.

It is clear that the objectives of the NPPF, and the terms of the NPPG both support and endorse the Sedgefield methodology as the appropriate methodology to use. ID 3-035-20140306 of the NPPG itself principally requires LPAs to aim to deal with any under-supply within the first five years of the plan period where possible, stating:

‘Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’. (Our emphasis).

The NPPG is consistent with the thrust of the NPPF. The NPPF is aimed at boosting the delivery of housing and meeting identified needs. There is no sensible justification for seeking to put off delivery of an already acquired shortfall to later parts of the plan period.

National policy and guidance therefore strongly justifies the use of the Sedgefield model here. Significantly, this is the methodology that has been applied by the Secretary of State (SoS) himself in numerous appeal cases, including a number of different decisions which followed from the introduction of the NPPF, namely:

* Land west of Shottery, Stratford-on-Avon (October 2012) [IR Para 497] (SOS case);
* Daux Avenue, Billingshurst (April 2013) [IR paras 4-47];
* Station Road, Honeybourne (August 2012) [IR para 36]; and
* Hook Norton, Cherwell (September 2013) [IR Para 198] (SoS case).

The Sedgefield approach has also been applied specifically to WODC’s area by recent Inspectors including in relation to an appeal scheme comprising the erection of 270 dwellings at Burford Road, Witney (PINS Ref. 3005737). This appeal was allowed by the Secretary of State in August 2016, in accordance with his Inspector’s recommendation. Paragraph 256 of the Inspector’s Report supports the application of the Sedgefield methodology in West Oxfordshire:

‘The Council readily admit that it has traditionally always used the Liverpool method of amortising shortfall or surplus across the remaining term of the plan period [165]. This in itself is not a good enough reason to continue its use, particularly as the PPG advises that
Council’s should aim to deal with any undersupply within the first five years of the plan period where possible. The Council suggested that in times of surplus the Liverpool method brings housing forward faster298 [165]. That is not a persuasive argument in their current position of uncertainty and does not justify a departure from the PPG guidance in the case of West Oxfordshire’s approach to this appeal299. The EiP Inspector highlighted that the Council should have particular regard to National Guidance on this matter as the Liverpool method is not mentioned300. In heeding his advice there was no credible justification presented at the Inquiry to go against the PPG in this instance.

Therefore, for these reasons the use of the Sedgefield method promoted by the appellant company is favoured in this appeal” (paragraph 256) (Our emphasis).

WODC’s proposed use of the Liverpool methodology is also contrary to the EiP Inspector’s preliminary conclusions where he stated:

On the basis of the plan’s current requirement of 525 dpa there has already been a shortfall in delivery since 2011 of 885 dwellings. National Guidance seeks any such shortfall to be made up in the next 5 years. On the Council’s own assessment of land supply this is achievable and so the Council accepts that an alternative approach could not currently be justified. If the housing requirement is increased, the shortfall will be greater and may need further action to address. The Council needs to have particular regard to National Guidance on this matter, as the ”Liverpool method” (spreading the shortfall over the whole plan period) is not mentioned. (paragraph 2.15) (Our emphasis)

Ultimately, the use of the Sedgefield approach is not a punishment for LPAs but merely the effective and positive way of boosting the supply of housing, particularly in LPA areas that have had time expired Local Plan for a number of years (as is the case for WODC). Ultimately the delay in having an up-to-date Local Plan is the Council’s responsibility and forms the true reason why under delivery has occurred over the first 5 years of the plan period. As per our comments in response to main modification no. 24, WODC have made a plan making decision not to identify a larger suite of smaller / medium sized sites to support these strategic allocations. This results in a failure to demonstrate a 5-year housing land supply when assessed using the Sedgefield methodology.

WODC’s suggested use of the Liverpool methodology is contrary to the clear advice of the EiP Inspector’s preliminary findings, the NPPG and recent Section 78 appeal decisions. The Council’s approach is therefore not justified, inconsistent with national policy and is not effective.

We support this proposed minor modification and the use of a clearer base map of the District for Figure 5.1 (Affordable Housing Zones). In order to negate any disputes regarding which Zone a site falls into however, we suggest that the Affordable Housing Zones are included in an updated Proposals Map for the District (preferably an interactive one for ease of reference).
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<td>MM590</td>
<td></td>
<td>D. Bury</td>
<td>Mr</td>
<td>Bury</td>
<td>1361</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 31</td>
<td>Our client notes that the Examination Inspector stated at paragraph 4.2 in his Preliminary Findings - Part 2 that the &quot;3 value zones&quot; approach to affordable housing provision adopted by the Council &quot;was justified&quot; at the time that he published his findings. However, he did state at paragraph 4.1 that it was likely that the viability evidence would need to be updated before the Examination is re-opened and at paragraph 4.2 that &quot;the boundaries between the 3 zones could have been drawn differently.&quot; Our clients would endorse these comments and in the absence of any updated evidence from the Council, the company reserves its position regarding the soundness or otherwise of the &quot;3 value zones&quot; approach and the soundness or otherwise of the boundaries between the three zones. Accordingly, our client would wish to take part in any hearing sessions at which these matters are discussed.</td>
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<td>MM590</td>
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<td>D. Bury</td>
<td>Mr</td>
<td>Bury</td>
<td>1362</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 32</td>
<td>Our client notes that Policy H3 proposes a 50% rate in the &quot;high value zone&quot;, which includes Stanton Harcourt. This is higher than the percentage figure suggested for West Oxfordshire in the county-wide SHMA. That figure was 40%. It is also higher than the percentages adopted by neighbouring districts: in Cherwell the percentage in the adopted Local Plan is 30% or 35% depending on location; and in the Vale it is 35% across the district. In the absence of any updated evidence from the Council to justify 50% affordable housing provision in the &quot;high value zone&quot;, our client reserves his position regarding the soundness or otherwise of the Council's approach and would wish to take part in any hearing session at which this matter is discussed. The previous points notwithstanding, our client welcomes the acknowledgment in Policy H3 that the level of affordable housing to be provided on qualifying sites will be subject to viability testing. In this regard, our client notes also that at paragraph 4.2 in his Part 2 Preliminary Findings the Examination Inspector made the point a...</td>
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"Later hearings will need to assess whether the combination of affordable housing and infrastructure requirements and the proposed CIL charge are justified for particular locations."

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<tr>
<td>MM724</td>
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<td>Gallagher Estates Limited</td>
<td>-</td>
<td>Gallagher Estates Limited</td>
<td>1677</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 32</td>
<td>Main 32 - Starter Homes 2.36 The modification seeks to insert wording to support in principle the provision of starter homes as part of a broader mix of affordable housing types. The draft text correctly states that the Government has indicated that starter homes will generally comprise 20% of the overall scheme mix. We support the proposed modification which is considered to be consistent with emerging Government aspirations and which allows sufficient flexibility to allow the Plan to respond to the requirement as further details emerge.</td>
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<tr>
<td>MM774</td>
<td>Rentplus</td>
<td>Rentplus</td>
<td>-</td>
<td>Rentplus</td>
<td>2081</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 32</td>
<td>We represent Rentplus, a company providing an innovative affordable housing model aimed at delivering discounted rented homes to buy for people aspiring to own their own home but trapped by ineligibility for other affordable housing. Enclosed with this consultation response is an Affordable Housing Statement by Tetlow King Planning setting out the model's compliance with the NPPF definition of affordable housing and how this should be incorporated into local plans to boost supply and meet local needs. We ask that this be read alongside our representation so that the Council’s strategic planning team take into account this innovative, Government supported, model. This innovative tenure allows families to move to more appropriate homes, freeing up social rented or affordable rented properties for households in greater need. It also allows those families trapped in private rented sector accommodation, or still living with parents to gain independence and security of tenure. The delivery of Rentplus homes as part of a mixed tenure (or mixed use) scheme also has the potential to speed up overall delivery as the product does not require grant funding, and can be occupied speedily. Partner Registered Providers are also given the option of purchasing any Rentplus property that is not bought by an individual household within the 20 year period, giving the Registered Provider an opportunity to continue offering that property as any affordable housing tenure. West Oxfordshire District is invited to enter into a Memorandum of Understanding (MoU) with Rentplus, setting out joint aims to deliver high quality housing to local people in need. This provides a best endeavours commitment by Rentplus to replenish stock sold in the District on a one for one basis, allowing for a proportion of the affordable housing stock to be retained in the local area. There are clear challenges to delivering sufficient affordable housing across West Oxfordshire as recognised by the vision to meet local housing needs. In particular it is noted that there are barriers to home ownership relating to high house values within the area; the Government has recognised the benefits of this new tenure to overcome such barriers. Rentplus could deliver a significant number of affordable homes in West Oxfordshire, helping to meet the 274 affordable dwellings required per annum within the District (as set out at paragraph 5.39 of the Plan). We are encouraging planning authorities to incorporate the tenure within Local Plans to help those in need leave inappropriate housing for high quality new homes, thus freeing up those private rented sector or affordable homes for other households in need. Paragraph 5.38a Affordable Housing</td>
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<td>MM784</td>
<td>North Witney Land</td>
<td>North Witney</td>
<td>North Way</td>
<td>Land</td>
<td>-</td>
<td>2154</td>
<td>The approach set out in Paragraphs 5.38 onwards to include Starter Homes is largely appropriate, and supported. To further encourage delivery of a wide range of affordable homes to meet local needs and aspirations, we ask that the policy be amended to reference the Rent to Buy tenure. The proposed tenure split should also reference Rent to Buy, noting that this will bridge the needs of households who can currently afford to rent at an affordable level, but whose aspirations will be met by Rentplus homes. Such an approach would further encourage flexible responses to local need and changes in national policy.</td>
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<tr>
<td>MM425</td>
<td>Carterton Construction</td>
<td>Carterton</td>
<td>-</td>
<td>Construction</td>
<td>969</td>
<td>&gt; SECTION 5</td>
<td>The acknowledgement that Starter Homes can form part of the broader mix of affordable housing types is supported. The draft text correctly states that the Government has indicated that starter homes will generally comprise 20% of the overall scheme mix. We support the proposed modification which is considered to be consistent with emerging Government aspirations and which allows sufficient flexibility to allow the Plan to respond to the requirement as further details emerge.</td>
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<tr>
<td>MM590</td>
<td>D. Bury</td>
<td>Mr</td>
<td>Bury</td>
<td>1363</td>
<td>&gt; SECTION 5</td>
<td>&gt; PROVIDING</td>
<td>Our client notes that the Examination Inspector stated at paragraph 4.2 in his Preliminary Findings - Part 2 that the &quot;3 value zones&quot; approach to affordable housing provision adopted by the Council &quot;was justified&quot; at the time that he published his findings. However, he did state at paragraph 4.1 that it was likely that the viability evidence would need to be updated before the Examination is re-opened and at paragraph 4.2 that &quot;the boundaries between the 3 zones could have been drawn differently.&quot; Our clients would endorse these comments and in the absence of any updated evidence from the Council, the company reserves its position regarding the soundness or otherwise of the &quot;3 value zones&quot; approach and the soundness or otherwise of the boundaries between the three zones. Accordingly, our client would wish to take part in any hearing sessions at which these matters are discussed.</td>
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<td>NEW HOmes &gt; MAIN 32</td>
<td>Our client notes that Policy H3 proposes a 50% rate in the &quot;high value zone&quot;, which includes Stanton Harcourt. This is higher than the percentage figure suggested for West Oxfordshire in the county-wide SHMA. That figure was 40%. It is also higher than the percentages adopted by neighbouring districts: in Cherwell the percentage in the adopted Local Plan is 30% or 35% depending on location; and in the Vale it is 35% across the district. In the absence of any updated evidence from the Council to justify 50% affordable housing provision in the &quot;high value zone&quot;, our client reserves his position regarding the soundness or otherwise of the Council's approach and would wish to take part in any hearing session at which this matter is discussed. The previous points notwithstanding, our client welcomes the acknowledgment in Policy H3 that the level of affordable housing to be provided on qualifying sites will be subject to viability testing. In this regard, our client notes also that at paragraph 4.2 in his Part 2 Preliminary Findings the Examination Inspector made the point at his paragraph 4.2 that: &quot;Later hearings will need to assess whether the combination of affordable housing and infrastructure requirements and the proposed CIL charge are justified for particular locations.&quot;</td>
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<td>North Witney Land</td>
<td>North Witney</td>
<td>-</td>
<td>Land</td>
<td></td>
<td>Main 32 - Starter Homes</td>
<td>2.38 The modification seeks to insert wording to support in principle the provision of starter homes as part of a broader mix of affordable housing types. The draft text correctly states that the Government has indicated that starter homes will generally comprise 20% of the overall scheme mix. We support the proposed modification which is considered to be consistent with emerging Government aspirations and which allows sufficient flexibility to allow the Plan to respond to the requirement as further details emerge.</td>
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</table>
7) Policy H3 – Affordable Housing

Whilst an affordable housing contribution for schemes of 6-10 dwellings in the AONB is appropriate, the requirement set out in Policy H3 in this regard appears vague and imprecise, contrary to Planning Practice Guidance. It simply requires “a financial contribution.” The Policy would benefit from detailed clarification through the provision of further information/reference in this regard.

It is not clear why all 6-10 unit schemes in the AONB should comprise market housing, as implied by Policy H3, which requires off-site affordable housing contributions. As worded, Policy H3 would require a 10 unit 100% affordable housing scheme in the AONB to make an (undefined) off-market affordable housing contribution. This is contrary to Paragraph 173 of the Framework in respect of viability and deliverability and there is no evidence to the contrary.

Taking the above into account, this part of Policy H3 makes little sense given the Local Plan’s recognition of the need for affordable housing throughout the District.

The Council’s broad-brush approach to “value areas” is flawed. It fails to take into account significant value-differences within the three “zones.” Values within the zones fluctuate significantly, dependent upon location. As set out, Policy H3 would result in a site in a supposedly higher value area being subject to a higher tariff when, in reality, the end value of the development would be lower than that in the supposedly lower value area. There is a paucity of evidence to demonstrate that the approach set out in Policy H3 properly reflects the difference in values and build costs across the whole of each value area, as well as between value areas.

In addition to the above, West Oxfordshire District Council has previously been presented with detailed evidence of land costs, build costs and development values by local landowners and developers. This information clearly demonstrated that the arbitrary high-medium-low value zone approach in Policy H3 fails to fully reflect reality. It has not been taken into account.

Consequently, to some considerable degree, the proportionate 35%, 40% and 50% figures comprise guesswork and are unsuitable for adoption as a statutory land use planning policy basis for decision making.

Policy H3, as worded, will simply slow down the planning process – contrary to national policy – as developers will need to expend further costs in slow and costly negotiations to demonstrate viability. It is Blenheim Estates’ experience that West Oxfordshire District Council does not have adequate resources to act efficiently in respect of such matters and it is respectfully suggested that Policy H3 will make an existing problem even worse.

The approach set out in Policy H3 will add further layers of unnecessary detail, much of which are ultimately based on the flawed concept of the District splitting simply and neatly into three value Zones – which it does not.

A requirement for 50% affordable housing in any part of West Oxfordshire District is unjustified. The London Boroughs have accepted that 35% affordable housing is appropriate. In London, a figure of 35% is, in 2016, widely recognised as a percentage that can help to speed up the delivery of, and fundamentally, ensure the provision of, affordable housing. Development and sales values in London are greatly in excess of those in West Oxfordshire. The Council is simply out of touch in seeking to impose a 50% affordable housing requirement at a time when residential development and the provision of affordable housing needs to be
Again, the approach set out in Policy H3 will simply result in slowing down the process, as developers need to go through the long, costly and unnecessary process of having to demonstrate viability and go through lengthy negotiations, during which time housing will not be delivered. In this way, Policy H3 fails to contribute to the achievement of sustainable development. Rather, it serves to prevent development that is sustainable from going ahead without delay.

Policy H3’s reference to “considering revised mix” prior to “accepting” lower provision appears imprecise and fails to provide a decision maker with a clear indication of how to react to a development proposal, as required by Paragraph 154 of the Framework. Notwithstanding this, its inclusion demonstrates that the Council recognises that the approach set out in Policy H3 will inevitably result in viability issues. However, rather than provide for efficient and effective consideration of viability, Policy H3 could obfuscate and delay matters even further.

By its very nature, a large residential development, for say 50 or more dwellings, could comprise endless different housing mixes. No indication is provided on the basis of which a “revised mix” will be considered. This part of the Policy simply enables the Council to refuse to progress negotiations until an (undefined) different approach to a development is provided. This makes little sense as a developer will seek to provide a housing mix that meets market demand and providing a different mix will, by definition, be less demanded in the market. This will only have one impact on viability. The requirement for consideration of a different mix inserts a further unnecessary delay into the planning process, contrary to planning policy and guidance.

Policy H3 has no control over external funding and how a development is funded is not a land use planning matter. The reference to external funding should be removed.

The Government is encouraging the provision of starter homes. Paragraph 5.53 states that the starter homes will form part of “a broader mix of affordable housing types.” However, there is no policy reference at all to starter homes. As set out, Policy H3 is largely flawed as it serves to delay the planning process. It is considered that Policy H3 would be better if it was a positive land use planning process, which encouraged an innovative approach to the provision of appropriate affordable housing across the District. This should include establishing a positive policy basis for the provision of starter homes. It should also recognise that life moves on and that affordable housing is provided in all manner of forms in 2016. For example, Registered Social Landlords provide more market housing than ever and public and private developers provide for affordable housing than ever.

Given that thousands of affordable homes will be built across West Oxfordshire over the next fifteen years, the Council has an opportunity to look forward and seek to provide a positive land use planning policy that reflects the affordable housing market in 2016 and ahead. In this way, it can provide a policy to encourage and support the provision of a broad mix of high quality, well-designed affordable housing.

Rather than encourage and support, as worded, Policy H3 appears to set out a negative, “doomed to fail” approach of attempting to extract an unrealistic proportion of affordable housing from future development. This will simply result in delays and appeals and not the efficient delivery of high quality affordable homes for the people of West Oxfordshire.

I have noted the requirements for affordable housing under main modification 33 of policy H3 of the draft Local Plan which vary from 35% to 50% of market housing, depending on the ‘zone’ the site is situated within. I want to clarify in relation to Oxford’s unmet housing need, what percentage of affordable housing is encouraged.
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<td>c/o Barton Willmore</td>
<td>1921</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 33</td>
<td>Intended to be sought and what is the justification?</td>
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<td>MM752</td>
<td>Bloombridge</td>
<td>Bloombridge</td>
<td>Mr Cutler</td>
<td>1924</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 33</td>
<td>Affordable Housing Need</td>
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<td>MM764</td>
<td>Oxford University and Colleges</td>
<td>Oxford University and Colleges</td>
<td>-</td>
<td>1994</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 33</td>
<td>In relation to Affordable Housing the University &amp; Colleges request a different policy approach to that element of the housing provision in the Local Plan that is aimed at meeting the housing needs of Oxford. Given that the specific purpose of this component of the Local Plan is to meet the housing needs of Oxford, the relevant allocations should reflect the dynamics of that particular housing market. In this regard, the University &amp; Colleges request that within the definition of affordable housing, specific allowance is made for the key workers employed by the University and Colleges. As with other employers in the City, the University &amp; Colleges frequently experience the deterrent to recruiting new staff and retaining existing staff that the unaffordability of housing represents. This can be a deterrent to the university &amp; Colleges attracting the brightest and the best young researchers coming to work in Oxford. This is a direct threat to the University maintaining its status as the Number 1 University in the World; to remain the best it must attract and retain the best academic minds. Meeting the needs of the University’s key workers is not currently addressed in the affordable housing policies that apply in Oxford. However, the University &amp; Colleges are in discussions with the City Council to introduce such an amendment to the City’s policies. The University is asking the City Council to recognise in the definitions used in the Local Plan that its academic staff, early career research staff and technical and support staff should be identified as key workers. The University has many academic, technical and support staff on lower incomes who cannot afford to buy a house at current market prices, whether that is in Oxford or in the adjacent districts. It is intended that through this mechanism (sites or part of sites) that are being brought forward specifically to meet the requirements of key workers should be exempt in the Local Plan from the affordable social housing</td>
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<td>MM767</td>
<td>Blue Cedar Homes</td>
<td>Simon Tofts</td>
<td>Mr Tofts</td>
<td>2008</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 33</td>
<td></td>
<td>I note that the Affordable Housing policy as currently drafted states“ ...Reduced levels of affordable housing provision will be applied in relation to 'supported living' accommodation including extra-care and sheltered housing” (page 64). Whilst the Council have clearly recognised the two types of housing at opposite ends of the ladder, the policy does not go far enough. The reduced levels of affordable housing provision should be applied to all types of retirement housing. The Government is encouraging older peoples housing, as set out in the National Planning Policy Guidance (NPPG). Moreover, at paragraph 21 the NPPF explicitly states that housing for older people is “critical”. The situation will only get exacerbated unless things change. Retirement and the majority of affordable housing are at opposite ends of the housing ladder but both are equally important. The fundamental reason why older people’s housing is not coming forward at the rate it truly needs to is because of its incompatibility with affordable housing, especially on much smaller sites of say 1 acre. Consideration should be had to other methods of affordable housing delivery, not just that it must be delivered on-site. That is not to say affordable housing should be ignored. On the contrary, its delivery is crucial, but so too is housing for older people. Indeed, whilst not specifically recognised in any policy, providing specialist retirement housing will result in family housing that is currently occupied by older people, being ‘freed up’ and becoming vacant for younger families. These issues should be recognised in any future affordable housing wording. Whilst I appreciate that there is a real need to provide affordable housing in West Oxfordshire, in reality our schemes generate a small level of affordable housing and quite often a Registered Provider is not attracted to make an offer for the number available. This has been especially true ever since the Budget 2015 announcement of reductions in social rents in the four years from 2016-2017. As well as a reduction in the level of affordable housing, commuted sums should also be seriously considered. For example, a scheme of say 12 no. retirement properties would require 40% affordable housing in a Medium Value Zone, i.e. five affordable units. It would benefit all parties if in the aforementioned example, a commuted sum would be accepted by the Local Planning Authority. A Registered Provider could use the money to provide more affordable housing on much larger sites. In turn, this would bring forward much needed retirement properties to an area which has a shortage at both ends of the housing ladder - affordable and retirement. I believe there should be some flexibility in the way affordable housing provision is sought from specific types of housing, namely retirement housing. Whilst I appreciate there is a recognised need for affordable housing, there is also a recognised need in the Authority for homes for the elderly. Much greater attention to paragraph 21 of the NPPG should be made by the Council.</td>
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<td>Rentplus</td>
<td>-</td>
<td>2082</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 33</td>
<td></td>
<td>We represent Rentplus, a company providing an innovative affordable housing model aimed at delivering discounted rented homes to buy for people aspiring to own their own home but trapped by ineligibility for other affordable housing. Enclosed with this consultation response is an Affordable Housing Statement by Tetlow King Planning setting out the model's compliance with the NPPF definition of affordable housing and how this should be incorporated into local plans to boost supply and meet local needs. We ask that this be read alongside our representation so that the Council’s strategic planning team take into account this innovative, Government supported, model. This innovative tenure allows families to move to more appropriate homes, freeing up social rented or affordable rented properties for households in greater need. It also allows those families trapped in private</td>
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rented sector accommodation, or still living with parents to gain independence and security of tenure. The delivery of Rentplus homes as part of a mixed tenure (or mixed use) scheme also has the potential to speed up overall delivery as the product does not require grant funding, and can be occupied speedily.

Partner Registered Providers are also given the option of purchasing any Rentplus property that is not bought by an individual household within the 20 year period, giving the Registered Provider an opportunity to continue offering that property as any affordable housing tenure. West Oxfordshire District is invited to enter into a Memorandum of Understanding (MoU) with Rentplus, setting out joint aims to deliver high quality housing to local people in need. This provides a best endeavours commitment by Rentplus to replenish stock sold in the District on a one for one basis, allowing for a proportion of the affordable housing stock to be retained in the local area.

There are clear challenges to delivering sufficient affordable housing across West Oxfordshire as recognised by the vision to meet local housing needs. In particular it is noted that there are barriers to home ownership relating to high house values within the area; the Government has recognised the benefits of this new tenure to overcome such barriers. Rentplus could deliver a significant number of affordable homes in West Oxfordshire, helping to meet the 274 affordable dwellings required per annum within the District (as set out at paragraph 5.39 of the Plan). We are encouraging planning authorities to incorporate the tenure within Local Plans to help those in need leave inappropriate housing for high quality new homes, thus freeing up those private rented sector or affordable homes for other households in need.

Paragraph 5.38a Affordable Housing

The approach set out in Paragraphs 5.38 onwards to include Starter Homes is largely appropriate, and supported. To further encourage delivery of a wide range of affordable homes to meet local needs and aspirations, we ask that the policy be amended to reference the Rent to Buy tenure. The proposed tenure split should also reference Rent to Buy, noting that this will bridge the needs of households who can currently afford to rent at an affordable level, but whose aspirations will be met by Rentplus homes. Such an approach would further encourage flexible responses to local need and changes in national policy.

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<td>MM357</td>
<td>Tony Bovey</td>
<td>Mr</td>
<td>Bovey</td>
<td>672</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 33</td>
<td>5.66: support provision of “starter homes”, which will encourage mixed communities with a range of socio economic groups. Policy CO1, reduce need to travel, especially by car: see comments above about garden village overspill. Policy CO 10: an essential part of the Plan that must be followed, eg, A40 improvement, distributor roads, cycle ways, etc. Policy CO 11: inter alia, protect and enhance the A 40 cycleway and build Eynsham- Botley cycle path.</td>
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<td>MM425</td>
<td>Carterton Construction</td>
<td>-</td>
<td>Carterton Construction</td>
<td>970</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 33</td>
<td>2.39 No modifications are proposed to the proposed affordable housing requirements for general (C3) housing. A modification is however proposed to apply reduced levels of affordable housing provision in relation to ‘supported living’ accommodation including extra-care and sheltered housing. 2.40 In principle we support the reduction in affordable housing requirements in relation to extra-care and sheltered housing. For clarity the Policy wording should specify that the proposed reduced levels would only apply in respect of C2 uses. Whilst thresholds at which the requirement for affordable housing is triggered are stated in the Policy in...</td>
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2.41 Whilst we support the principle of the proposed modification, we are unable at this stage to comment on the proposed proportions of affordable housing sort on such schemes. Currently there is insufficient information in the Council's evidence base to justify this amendment or to clarify how the decision on the proposed proportions has been reached. The only viability assessment prepared to support the Proposed Modifications relates to the Strategic Development Areas only and as such no assessment of the overall implications of this modification on the deliverability of the Plan has been provided.

2.42 Notably the Sustainability Appraisal Addendum Report summarises the proposed changes to Policy H3 as:

"Policy amended to include reference to starter homes and the delivery of market housing on rural exception sites to facilitate the delivery of affordable housing."

2.43 The Report therefore concludes that the changes are "minor changes for clarification and not significant with regard to the SA." From the above it appears that the SA has not considered the implications of the proposed modification in respect of supported living accommodation. Clearly the proposed modification is likely to result in a reduced overall delivery rate in respect of affordable housing and the implications of this should be assessed through the Sustainability Appraisal and supported by a proportionate evidence base. Further work is therefore required to demonstrate that the proposed modification is sound.
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<td>Gallagher Estates Limited</td>
<td>Gallagher Estates Limited</td>
<td>1679</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 39</td>
<td>2.37 The proposed revised policy wording seeks to ensure new developments of 50 or more dwellings provide at least 25% of these homes as accessible and adaptable housing (formerly lifetime homes). The NPPG makes clear that it is for LPAs to demonstrate the need for requirement for M4(2) (accessible and adaptable dwellings). It is considered that insufficient evidence has been provided by the Council to justify this requirement. Based on the currently available evidence it is considered the requirement is unsound.</td>
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<td>Gallagher Estates Limited</td>
<td>Gallagher Estates Limited</td>
<td>1717</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 39</td>
<td>2.39 The proposed revised policy wording seeks to ensure new developments of 50 or more dwellings provide at least 25% of these homes as accessible and adaptable housing (formerly lifetime homes). The NPPG makes clear that it is for LPAs to demonstrate the need for requirement for M4(2) (accessible and adaptable dwellings). It is considered that insufficient evidence has been provided by the Council to justify this requirement. Based on the currently available evidence it is considered the requirement is unsound.</td>
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| MM724        | Gallagher Estates Limited     | Gallagher Estates Limited | 1719       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 39 | 2.40 The Proposed Modifications to the Policy propose that in addition to Strategic Development Areas, all residential development for 100 dwellings or more is required to provide "an energy assessment or strategy which assesses viability for decentralised energy systems, including consideration of the use of local wood fuel biomass and other renewable energy initiatives."
2.41 The Government has adopted a clear stance of moving away from locally set standards in respect of renewable energy for housing scheme, with such matters instead addressed through the Building Regulations. Furthermore decentralised energy systems are unlikely to be appropriate for the majority of new residential developments, even those over the proposed 100 dwelling threshold.
2.42 Should such a requirement be enforced this is likely to prevent the early delivery of phases of larger strategic sites which will have negative implications for the Council’s housing land supply and indeed would be an additional infrastructure provision requirement which would delay lead-in times for the delivery of the much needed new homes in the District. As such we consider the proposed modification to be unsound in that it is not justified, effective or consistent with national policy. There is no evidence to justify a different approach in West Oxfordshire, and such an approach has been struck out by other Inspectors at Examination. |
<p>| MM745        | Gladman Developments Limited | Richard House (Gladman) | 1794       | &gt; SECTION 5 - PROVIDING NEW HOMES &gt; | 8.1 Policy H4 is proposed to be amended to clarify that wheelchair adaptable housing will be required and that wheelchair accessible housing will be encouraged (but restricted to dwellings for which the Council is responsible for allocating or nominating a person to live in that dwelling). However, the policy as drafted does not reflect that clarification, requiring larger housing developments of 50 or more dwellings to provide a specifically amended to account for C2 uses. The Council’s position in this respect is therefore not justified and inconsistent with national guidance. |</p>
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<td>MM747</td>
<td>Dijksman Planning</td>
<td>Ken Dijksman</td>
<td>Mr Dijksman</td>
<td>1807</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 39</td>
<td>I wish to object to the unjustified application of ridged affordable housing and market housing mix requirements set out in policy H4 Main mod 39, there should be an explicit acknowledgement that the mix should be able to respond to local market and social conditions if it is to be effective in delivering socially sustainable development.</td>
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<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>-</td>
<td>2155</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 39</td>
<td>The additional clarification proposed to Policy H4 (Type and Mix of New Homes) is supported. However, although the principle of ensuring an appropriate mix of dwellings including the provision of accessible and adaptable housing is supported, we still have concerns that the policy requirements as currently drafted are excessively stringent. The policy requires the provision of a minimum of 25% of developments as accessible and adaptable housing (formerly Lifetime Homes). It is not clear however what the evidential basis is for this 25% requirement and so the Council should provide a clear justification for this level of accessible and adaptable housing in advance of the Examination in Public. In addition 5% of new homes as a minimum are required as wheelchair adaptable dwellings. Although the requirement for both elements is caveat ed that this will be a matter for negotiation it is considered that this should be expanded. The policy wording should be made more flexible by allowing for a reduced requirement where justified on viability grounds.</td>
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<td>MM251</td>
<td>Andrew Garbutt</td>
<td>Mr Garbutt</td>
<td>728</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 39</td>
<td>We also believe that development density should be reviewed. The housing mix proposed by the SHMA and noted in 5.63 (with only 32.7% 1 &amp; 2 bed, which is very similar to past figures- see clause 2.17) is not consistent with the occupancy assumed in deriving the target. Since affordability is the real issue we are trying to address in the District (as market demand is coming from outside the District mainly), then we need small, high density units. People need to start somewhere to get on the housing ladder. Any assigned land allocations must deliver the maximum number of units and those units must be as affordable as possible. This can only be achieved through higher density development. The mix of housing proposed does not maximise the land available, nor deliver the lowest cost housing that is clearly needed. We welcome increased allocations to existing strategic sites, rather than too many new allocations, but we propose an early review of all allocations to ensure that they are maximised. Specifically, it should be investigated whether the same number of houses could be built on less land, leaving space for the next Plan Period instead of having to make additional allocations. Ideally, any permissions of 10 or more houses that have not been built out should be the subject of a discussion with the applicant to see if numbers can be increased.</td>
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<td>MM425</td>
<td>Carterton Construction</td>
<td>- Carterton Construction</td>
<td>971</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 39</td>
<td>2.4.4 The proposed revised policy wording seeks to ensure new developments of 50 or more dwellings provide at least 25% of these homes as accessible and adaptable housing (formerly lifetime homes). The NPPG makes clear that it is for LPAs to demonstrate the need for requirement for M4(2) (accessible and adaptable dwellings). It is considered that insufficient evidence has been provided by the Council to justify this requirement. Based on the currently available evidence it is considered the requirement is unsound.</td>
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<tr>
<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>-</td>
<td>2156</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 40</td>
<td>The Council's intention to produce a Design Code for custom/self-build housing is supported in principle; however either the wording of Policy H5 or the supporting text should be amended to make it clear that such a Design Code is yet to have been produced, as the proposed main modification is somewhat misleading at present. Whilst we agree that custom and self-build may be appropriate for some schemes, as set out within our representations on the Pre-Submission Local Plan however, we do not consider that large strategic sites are an appropriate location and are unlikely to be taken up. Although the policy wording does allow for plots to revert to the developer after 12 months should there be insufficient demand for such plots it is considered that this will delay the delivery of the scheme, create uncertainties in the build programme for developers and potentially add additional costs as a result of abortive work. Furthermore the PPG makes clear that the Local Planning Authority must assess the local demand for self-build housing. The PPG advises: &quot;Plan makers should, therefore, consider surveying local residents, possibly as part of any wider surveys, to assess local housing need for this type of housing, and compile a local list or register of people who want to build their own homes.&quot; (ID 2a-020-20140306) Whilst the SHMA does consider the demand for self and custom build housing in Oxfordshire, it advises that: &quot;In policy terms there is some potential to encourage through policy developers of larger schemes to designate parts of these schemes as serviced plots which can be developed as self-build. There is some, albeit limited evidence of this. It is difficult to demonstrate concrete evidence of demand.&quot; There is also no reference to custom or self-build housing in the Partial Update of the Oxfordshire SHMA (July 2016), prepared by Peter Brett Associates. Based on all the proposed Strategic Development Areas and Non-Strategic Housing Allocations of over 100 units, the 5% requirement in Policy H5 equates to the provision of at least 381 custom/self-build plots over the plan period. This is considered to be highly excessive, particularly when compared to the 183 people who are currently registered on the District's Register of Interest, as set out in minor additional modification MIN32 (some of whom may also be registered with other Local Planning Authorities). Given the lack of evidence available to underpin and justify this requirement it is therefore considered to be unsound. The policy wording should be amended to remove reference to the 5% requirement. Based on the current policy wording, it is also considered that the provision of 5% self-build plots on strategic sites has the potential to have significant viability implications, particularly as a result of the higher infrastructure costs which these sites are already subject to. It is therefore considered that the 5% requirement for self-build plots should be removed from the strategic sites. The Council’s housing targets are, in part, reliant on the deliverability of large strategic housing sites. In the case of the North Witney SDA, a 5% requirement on this site as currently proposed would equate to 70 plots (based on 1,400 homes) set aside for custom/self-build units. This is a substantial number of units, which has the potential to significantly impact development viability and completion times. As set out within the PPG, these units would not be required to contribute towards CIL or potentially other Section 106 requirements if planning permission was sought individually for each self-build house.</td>
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<tr>
<td>MM406</td>
<td>Kingham Parish Council</td>
<td>Kingham Parish Council Ms N Marina</td>
<td>Ms</td>
<td>Marina</td>
<td>896</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 41</td>
<td>This is a particular issue for the North Witney SDA, as the revenue from all the new residential dwellings proposed will be used, in part, to fund the significant package of infrastructure improvements required by the Council, including the West End Link (WEL) and the Northern Distributor Road. We therefore suggest that the Strategic Development Areas should be excluded from Policy H5 (Custom and Self-Build Housing). Whether or not the percentage requirement of custom/self-build housing is amended, should the Council be minded to retain a requirement for all housing developments of 100 or more dwellings, we consider that the words &quot;subject to viability&quot; should be inserted at the end of the first sentence of Policy H5 to provide sufficient flexibility in the policy wording.</td>
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<td>MM758</td>
<td>Eynsham Park Estate</td>
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<td>1943</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 42</td>
<td>Travelling Communities. 5.116 and 5.120. &quot;...the Council commissioned new evidence to establish future accommodation requirements in the period up to 2031&quot; and the conclusions are cited in 5.120. There is no mention or reference as to how this evidence was gathered, on the basis on which it was arrived at and thus no means to assess its soundness. There is no reference to the evidence on the WODC website and no indication of any public consultation on this evidence. 5.120 indicates a need to 19 pitches but 5.121b indicates that this should be reduced by 90% but only to 2 pitches needed after 5 years (why only after 5 years?) As above it is impossible to assess the evidence that produces these inconsistent figures and is not consistent with the need to 'use a robust evidence base to establish accommodation needs....' (Planning Policy for Traveller Sites, Aug. 2015 para 7c). 5.117. Kingham is mentioned as a gypsy site - this is misleading. There is one ex-traveler who was granted permission to settle on this site because of his personal circumstances. Permission is personal to him and his family so is ultimately temporary. Expansion would therefore be inappropriate. H7. This indicated that existing traveler sites will be safeguarded and expanded. Criteria for new sites are then listed. These criteria should also apply to expanding any existing sites.</td>
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Highways Concerns

The intensification of development on site will increase traffic movement of large vehicles within the vicinity on roads such as the A40, Eynsham Road and the B4044 which are already heavily trafficked. Contrary to Paragraph 5.12d, the SHELAA states that whilst access can be achieved from the existing access road off Cuckoo Lane the County Council have raised some concerns stating that speeds are very high and the visibility splay to the north probably will not be deliverable for these speeds. This then questions whether criterion b), of Policy H8, which sets out that any proposal for six plots at Cuckoowood Farm will need to provide a satisfactory vehicular access, can be achieved.

The County Council also raise a particular concern that a larger than normal proportion of vehicles using the access will be of a large and slow nature, further increasing risk to road users. Whilst the access is currently utilised by Travelling Showpeople, the allocation of six plots will double the frequency of use.

Surrounding Character and Setting

Whilst criterion a) of Policy H8 proposes further structural and boundary landscaping as part of any future proposal on the site, the proposed allocation falls within Eynsham Vale Landscape Area, as identified in the 'West Oxfordshire Landscape Assessment'. Overall, Eynsham Vale has an attractive and largely unspoilt rural character and this should be retained. The proposed allocation is not consistent with this objective and instead would seriously impact on the conservation of the area by virtue of its siting in the countryside. Large stationary vehicles on the site are particularly exposed to north, east and west. The allocation does not enhance or maintain the agricultural values of the site as additional plots would sterilise more land which is unsympathetic and is not appropriate or acceptable within the rural area. In addition, along the western boundary is a designated bridal way. The plots and vehicles associated with the proposed use will be in a prominent position to users. Accordingly the Estate considers the proposed allocation to be contrary to other emerging policies in the Local Plan, such as Policy EH1 in terms of minimising its impact on the countryside.

Local Amenity

The proposed allocation will lead to the intensification of noise and, as specified above, the movement of vehicles within the vicinity and on the site. This would be detrimental to the residential amenity and living environment of both existing housing located to the south and the approved Travelling Showpeople's site located to the east. The Estate considers the proposed allocation to be contrary to other emerging policies in the Local Plan, such as Policy OS4 as a satisfactory environment for existing residents would not be retained.

Size of the Site

The Showman's Guild recommends that plot sizes of 100 x 150 foot (15,000 sq ft) are required to accommodate the needs of Travelling Showpeople (to include storage) (source: Paragraph 6.3.1 of the Tribal Report). The application for the adjacent Travelling Showpeople site reference: 08/1885/P/FP (Change of use from agricultural to site for travelling show people) proposed relative uniform plot sizes for the site which appear to be in the region of 45 x 75 metres. This equated to 147 x 246 foot or 36,162 sqft. This represents a plot size of double the area suggested by The Showman's Guild. The total site area for this application was 3.6 hectares. Whilst Paragraph 5.121g and criterion e) of Policy H8 set out the need for an area of open and child's play at the proposed allocation, the site area (5.3 ha) is considerably larger than necessary for both the
provision of six plots and open space. Minimising the size of the site, whilst obviously meeting the requirements of its users, would assist in reducing the impact of development on the open countryside. The open space requirement should also be safeguarded against future expansion of Travelling Showpeople plots.

Conclusion

In summary, for the reasons outlined above, the Estate objects to the proposed allocation at Cuckoo Wood Farm for Travelling Showpeople. Accordingly, reference to the site should be removed from both Main Modifications 42 and 44. The Estate is particularly concerned that in a number of places the Main Modifications contradict the evidence and comments set out in the SHELAA.

Comments have been provided above in respect of the proposed main modifications to the WODC Local Plan 2031, and it is requested that due weight be given to these representations in the ongoing preparation of the emerging Local Plan.

If you have any questions in relation to these matters, please do not hesitate to contact Naomi Hubbard at the above address.

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| MM51          | Lomond Holdings - Mr M Chattoe | Mr Chattoe      |                   |                   | 115        | > SECTION 5 - PROVIDING NEW HOMES > MAIN 43 | On behalf of the land owner and promoter of the expansion of the site at Cuckoo Wood Farm the allocation of the site is supported. However, the basis of the scale of need for the provision of plots for Travelling Showpeople is questioned as well as the phasing of the provision as proposed. It is considered that the need for plots has been seriously underestimated. The latest Travelling Communities Needs Assessment has been based on the advice given in Policy A of the NPPF of the need for community engagement with both the settled and traveller communities including discussing the needs with travellers themselves, their representative bodies and local support groups. From an examination of the report the following relevant issues emerge. Although all pitches and plots were visited (3.11) there were 5 unknown showpersons households and estimates were made when interviews were not possible.(3.21) The Showman's Guild is quoted as pointing out that some showmen who operate in the area are found to live outside it. (5.26) In (3.34) it states that a component of future needs includes in-migration yet it is clear from Appendix in the report that no allowance has been made for this. However, it does say in (3.23) that should further information be made available to the Council these households could be added to the figure.

It is a pity that the owner of Cuckoo Wood Farm, who is a member of the Showman's Guild was not directly consulted by the authors of the report as he does have an up to date assessment of members of the Showman's Guild who are seeking accommodation in West Oxfordshire. This details 20 families with there background details who have a need for accommodation in the district. This can be submitted separately in the form of an Appendix. The lack of an allowance for in-migration is a serious flaw in the process, especially in the light of the advice under Policy H of the NPPF, where in determining applications LPAs “should determine applications for sites from any travellers and not just those with local connections.”

In terms of phasing, there are practical and economic reasons why the further provision of the plots at Cuckoo Wood Farm should not be subject to phasing as proposed. First of all it is not so relevant in the light of the scale of need now suggested. The latest TCAN assessment makes the point that because of land and development costs new yards are a challenge.(5.27) Although land costs are not involved in this case, the development has to be self financing. If only half the plots could go ahead it would not be practical for the limited development to finance the full extent of the substantial landscaping and basic infrastructure costs which would be more cost effective if provided in one go for the whole allocation. Nor would it make sense to phase the landscaping in the interests of the wider landscape issues, or provide satisfactorily for the... |
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| MM784 | North Witney Land Consortium | North Witney Land Consortium | | | 2157 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 43 | Whilst we have no comments on the majority of the proposed revised text, we do have some concerns regarding the statement that the Council will "consider the scope to include specific provision as part of the larger strategic development areas including in particular the West Oxfordshire Garden Village."

The proposed SDAs form a crucial means for the Council to seek to meet its housing requirement. The detailed requirements which the SDAs are to deliver are set out in the relevant policies for the sites themselves. Should any additional elements be required to be delivered as part of the SDAs these must be made clear within the policies relevant to the SDAs themselves.

The proposed modification is considered to be unsound in seeking to raise the potential for the SDAs to deliver an element of gypsy and traveller pitches. No assessment has been made of the potential implications this would have on the overall development capacity and the viability of the SDAs. As such, and given the crucial role that the SDAs are to play in meeting the Council’s housing requirement it is considered that reference to the potential for these making provision for gypsy and traveller should be removed from the current proposed modification text. |
| MM792 | Alvescot Parish Council | Alvescot Parish Council | Mrs | Hoad | 2321 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 43 | Main 43: Policy H7 Travelling communities

The Parish Council expects that in fulfilling the commitment to expand and/or intensify existing Gypsy and Traveller sites, the District Council will follow national guidelines including consultation with local communities. |
| MM61 | NP | Mr Pearce | | | 546 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 43 | MAIN 43, Policy H7

Not sound

There may be incoming new residents to the Garden Village who will object to further provision for travelling communities. |
| MM406 | Kingham Parish Council | Kingham Parish Council | Ms | Marina | 897 | > SECTION 5 - PROVIDING NEW HOMES > MAIN 43 | Travelling Communities. 5.116 and 5.120, "....the Council commissioned new evidence to establish future accommodation requirements in the period up to 2031" and the conclusions are cited in 5.120. There is no mention or reference as to how this evidence was gathered, on the basis on which it was arrived at and thus no means to assess its soundness. There is no reference to the evidence on the WODC website and no indication of any public consultation on this evidence.

5.120 indicates a need to 19 pitches but 5.121b indicates that this should be reduced by 90% but only to 2 pitches needed after 5 years (why only after 5 years?)

As above it is impossible to assess the evidence that produces these inconsistent figures and is not consistent with the need to 'use a robust evidence base to establish accommodation needs...." (Planning Policy for Traveller Sites. Aug. 2015 para 7c).

5.117. Kingham is mentioned as a gypsy site - this is misleading. There is one ex-traveler who was granted permission to settle on this site because of his personal circumstances. Permission is personal to him and his family so is ultimately temporary. Expansion would therefore be inappropriate.

H7. This indicated that existing traveler sites will be safeguarded and expanded. Criteria for new sites are residential amenities of the the new residents on a partially developed site. |
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| MM51          | Lomond Holdings - Mr M Chattoe | Mr Chattoe     | -                | 118               | 118        | > SECTION 5 - PROVIDING NEW HOMES > MAIN 44 | As the owner and promoter of the proposed expansion to the Cuckoowood Farm site there have been initial discussions with the LPA which have led to the principle of development being broadly agreed. Since these discussions the details of how such provision can be made has been through a refining process resulting in what is considered to be the optimum form of providing the necessary infrastructure in the most beneficial way meeting the principles of the allocation. The scheme has now been submitted in the form of a planning application and covers the issues under a), b), c), d), and e), in the following way.  

a) On consideration, it has been concluded that in the wider landscape interests and mitigating the impact of the development, it would be more beneficial if this woodland provision was to be made in the form of a substantial woodland belt that would extend along the western and northern boundaries of the allocated site. This has taken into account the fact that the landowner to the north has recently planted woodland in the adjoining field. This additional woodland will link the allocated site with Vincent's Wood to the north, which together with the landscape belt now proposed, would result in a continuous woodland landscape feature between Freeland and through to the southern extent of Cuckoo Wood Farm where it meets the Eynsham Road. The application provides for nearly 1 hectare of woodland planting within the allocated site.

b) The site is served by an existing private roadway from the Eynsham Road.

c) A surface water drainage scheme will serve the site in the same way as the established site. It is questioned whether the policy should be so prescriptive in setting out such requirements when the matter will be subject to the submission of details at an appropriate stage.

d) It is questioned that there is main sewer within any reasonable distance to the allocated site. It is suggested that the each plot provides its own package treatment as is the case on the existing site.

e) An area just short of 1 hectare of recreational open is provided by the submitted scheme in the northern section of the allocated land. This generous provision can be shared by the existing and future residents at Cuckoowood Farm. The area to the north has been chosen as it lies on the highest part of the land and gently slopes down to the plots and the access point. This location makes it attractive to future users and provide the best amenity setting and also serves to distance the nearby bridleway from the developed area of the allocation thereby enhancing its landscape setting whilst the new tree belt matures. |

| MM758         | Eynsham Park Estate       | -              | -                | 1944              | 1944       | > SECTION 5 - PROVIDING NEW HOMES > MAIN 44 | Policy H8: Land at Cuckoowood Farm, Freeland  
Main Modifications 42 and 44  
Unsustainable Location  
The National Planning Policy Framework (NPPF) seeks the delivery of sustainable forms of development. Accordingly Local Planning Authorities are to seek improved access to all facilities by ensuring that new development is located where everyone can access services by foot, bicycle and public transport rather than having to utilise a private car. The Cuckoowood Farm site is situated over a kilometre away from the A40, beyond which lies the settlement of Eynsham. This distance is likely to lead to dependency upon private motor vehicles in order to access everyday needs such as shopping facilities.  
In addition, contrary to paragraph 5.12d of the Main Modifications the recently published Strategic Housing Land and Economic Land Availability Assessment (SHELAA) identifies that there is a limited bus service along |
Cuckoo Lane and that there is limited access to services in close proximity to the site such as those in Eynsham and Freeland. Accordingly the Estate do not consider that this site represents a sustainable location for development as it is too isolated. As such it is considered contrary to the NPPF and other policies in the emerging Local Plan.

Highways Concerns

The intensification of development on site will increase traffic movement of large vehicles within the vicinity on roads such as the A40, Eynsham Road and the B4044 which are already heavily trafficked. Contrary to Paragraph 5.12d, the SHELAA states that whilst access can be achieved from the existing access road off Cuckoo Lane the County Council have raised some concerns stating that speeds are very high and the visibility splay to the north probably will not be deliverable for these speeds. This then questions whether criterion b), of Policy H8, which sets out that any proposal for six plots at Cuckoowood Farm will need to provide a satisfactory vehicular access, can be achieved.

The County Council also raise a particular concern that a larger than normal proportion of vehicles using the access will be of a large and slow nature, further increasing risk to road users. Whilst the access is currently utilised by Travelling Showpeople, the allocation of six plots will double the frequency of use.

Surrounding Character and Setting

Whilst criterion a) of Policy H8 proposes further structural and boundary landscaping as part of any future proposal on the site, the proposed allocation falls within Eynsham Vale Landscape Area, as identified in the ‘West Oxfordshire Landscape Assessment’. Overall, Eynsham Vale has an attractive and largely unspoilt rural character and this should be retained. The proposed allocation is not consistent with this objective and instead would seriously impact on the conservation of the area by virtue of its siting in the countryside. Large stationary vehicles on the site are particularly exposed to north, east and west. The allocation does not enhance or maintain the agricultural values of the site as additional plots would sterilise more land which is unsympathetic and is not appropriate or acceptable within the rural area. In addition, along the western boundary is a designated bridal way. The plots and vehicles associated with the proposed use will be in a prominent position to users. Accordingly the Estate considers the proposed allocation to be contrary to other emerging policies in the Local Plan, such as Policy EH1 in terms of minimising its impact on the countryside.

Local Amenity

The proposed allocation will lead to the intensification of noise and, as specified above, the movement of vehicles within the vicinity and on the site. This would be detrimental to the residential amenity and living environment of both existing housing located to the south and the approved Travelling Showpeople’s site located to the east. The Estate considers the proposed allocation to be contrary to other emerging policies in the Local Plan, such as Policy OS4 as a satisfactory environment for existing residents would not be retained.

Size of the Site

The Showman’s Guild recommends that plot sizes of 100 x 150 foot (15,000 sq ft) are required to accommodate the needs of Travelling Showpeople (to include storage) (source: Paragraph 6.3.1 of the Tribal Report). The application for the adjacent Travelling Showpeople site reference: 08/1885/P/FP (Change of use from agricultural to site for travelling show people) proposed relative uniform plot sizes for the site which
appear to be in the region of 45 x 75 metres. This equated to 147 x 246 foot or 36,162 sqft. This represents a plot size of double the area suggested by The Showman’s Guild. The total site area for this application was 3.6 hectares. Whilst Paragraph 5.121g and criterion e) of Policy H8 set out the need for an area of open and child’s play at the proposed allocation, the site area (5.3 ha) is considerably larger than necessary for both the provision of six plots and open space. Minimising the size of the site, whilst obviously meeting the requirements of its users, would assist in reducing the impact of development on the open countryside. The open space requirement should also be safeguarded against future expansion of Travelling Showpeople plots.

Conclusion

In summary, for the reasons outlined above, the Estate objects to the proposed allocation at Cuckoowood Farm for Travelling Showpeople. Accordingly, reference to the site should be removed from both Main Modifications 42 and 44. The Estate is particularly concerned that in a number of places the Main Modifications contradict the evidence and comments set out in the SHELAA.

Comments have been provided above in respect of the proposed main modifications to the WODC Local Plan 2031, and it is requested that due weight be given to these representations in the ongoing preparation of the emerging Local Plan.

If you have any questions in relation to these matters, please do not hesitate to contact Naomi Hubbard at the above address.

Ecology and Natural Environment

In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

Freeland – Cuckoo Wood Farm

The location of this site is not clear. It is believed that it may be in close proximity to Vincent’s Wood ancient woodland and other known priority habitat.

Flood risk is acknowledged at the Cuckoowood Farm extension for travellers (which is higher than the eastern section of the Garden Village site), but seriously downplayed along the northern fringe and eastern section of the Garden Village. When the travellers extension is connected to the mains sewerage network, will the dwellings in and around City Farm, currently served by septic tanks, also be connected?
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<tr>
<td>MM398</td>
<td>Freeland Parish Council</td>
<td>Freeland Parish Council</td>
<td>Mrs</td>
<td>Smith</td>
<td>862</td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 44</td>
<td>Freeland Parish Council has great concerns about the proposed expansion to the existing site at Cuckoo Wood Farm. In the section about Cuckoo Wood Farm, the updated Local Plan states at paragraph 5.121d that “as the peripheral hedgerow planting has become established, so the site has softened into the landscape.” Councillors (plus many local residents) would not agree with this statement. The site is an eyesore from the public footpath and the landscaping and hedge planting that was stipulated in the original application has not been adhered to. The site has not had limitations put upon it in terms of how many (non-static) caravans are permitted, even though the site currently only has 6 plots. This has led to a mass of caravans being permitted on the site, making the whole area an eyesore with attention being drawn to it at night as the whole area is lit up. It certainly does not blend or soften into the landscape, and further expansion would just be even more detrimental to the area. If expansion were to go ahead, destroying yet more open farmland, then the Parish Council would insist on assurances that there would be restrictions attached to the new site limiting the number of caravans permitted at any one time.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>153</td>
<td></td>
<td>&gt; SECTION 5 - PROVIDING NEW HOMES &gt; MAIN 45</td>
<td>Flood risk is acknowledged at the Cuckoowood Farm extension for travellers (which is higher than the eastern section of the Garden Village site), but seriously downplayed along the northern fringe and eastern section of the Garden Village. When the travellers extension is connected to the mains sewerage network, will the dwellings in and around city Farm, currently served by septic tanks, also be connected?</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2293</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 46</td>
<td>Section 6.13 Consider rephrasing paragraph to reflect role of walking and cycling in tackling congestion in towns and contributing towards key public health priorities for reducing inactivity/obesity.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1058</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 47</td>
<td>Historic England welcomes and supports the addition of “and heritage” to paragraph 6.13 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1102</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 47</td>
<td>Historic England welcomes and supports the amendment to paragraph 6.13 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
</tr>
<tr>
<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
<td>-</td>
<td>-</td>
<td>1882</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 47</td>
<td>MAIN 47 Para 6.13 states to plan for sustainable economic growth: “Address transport congestion in towns and on major routes - notably the A40. We will work in partnership with Oxfordshire County Council as they look to deliver already funded plans to improve access along the A40 corridor to Oxford through a proposed Park &amp; Ride site at Eynsham and a bus lane along the A40 eastbound into Oxford. We will also work with Oxfordshire County Council to identify funding for their long term strategy for the A40 which will involve dualling between Witney and Eynsham and a westbound bus lane.” Amendments to Paras 9.5.17 further state that: “Funding of £35m has been made available through the local growth fund and will be used to implement improvements including the provision of a new park and ride site to the north of Eynsham.” We support these amendments to the plan which set out information on the agreed Park &amp; Ride facility, we consider these amendments are justified and will assist with the delivery of sustainable development and are therefore sound.</td>
</tr>
<tr>
<td>MM399</td>
<td>Hailey Parish Council</td>
<td>Graham Knaggs</td>
<td>Mr</td>
<td>Knaggs</td>
<td>881</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 47</td>
<td>Main 104 - Alternative Options for Strategic Growth at Witney 9.2.50 Land to the south of Witney which straddles the boundaries of Ducklington and Curbridge Parishes, whilst physically proximate to the town centre and main employment areas in the south is segregated from the town by the A40. There are concerns regarding noise, odour and landscape impact and unlike the alternative options, the scheme would not deliver any strategic highway improvements for Witney.</td>
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<tr>
<td>MM446</td>
<td>OxLEP Limited</td>
<td>Sarah Beal</td>
<td>Ms Beal</td>
<td>1029</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt;</td>
<td>Support the clarification of the role of employment land at Chipping Norton. Support inclusion of text to reflect the proposed provision of a new science park as part of the proposed garden village to the north of Eynsham, which is intended to meet district needs up to 2031 and beyond.</td>
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</table>

Policy T1 - Sustainable Transport Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.

Witney’s main traffic bottleneck is at Bridge Street. With an average of 29,000 vehicles a day, it is the only vehicular crossing of the River Windrush for local journeys and through traffic from the north and east. The constraint of the river combined with the level of demand for vehicular travel results in severe congestion, delays to buses and air pollution (it is already an Air Quality Management Area). The environment deters cyclists and pedestrians from using the route.

The new A40/Down’s Road junction and A40/Shores Green improvements (Main 102) will significantly reduce traffic (and air pollution) in Bridge Street whereas the North Witney proposal combined with the recent successful applications on New Yatt Road (270 and 40 houses) will substantially increase traffic (and air pollution) in Bridge Street. Replacing North Witney with South Witney would potentially release £40m of S106 funding:

- Northern Distributor Road (£10m)
- West End Link road (£23.2m)
- Foul water drainage (£3m)
- Flood alleviation (£3m)

We will also work with Oxfordshire County Council to identify funding for their long term strategy for the A40 which will involve dualling between Witney and Eynsham and a westbound bus lane.

However, the £55m funding to facilitate the above long term strategy has yet to be identified. Selection of South Witney as an alternative to North Witney could be used to facilitate Oxfordshire County Council’s transport strategy outlined above to improve the A40 between Witney and Oxford. This proposed change of strategy would benefit substantially more residents than the existing strategy.

Other advantages to replacing North Witney with South Witney are:

* Traffic from South Witney would avoid the Bridge Street bottleneck (Air quality management area) on journeys into Witney.
* A South Witney development would be able to take advantage of the existing four way A40 junction at Ducklington and the proposed four way A40 junction with Downs Road, providing direct access to the main employment areas of Oxford, Witney and Carterton.
* Conversely the development of 1,400 houses at North Witney would significantly increase traffic in Bridge Street, even with the delivery of WEL2.

Remove North Witney from the Local Plan 2031 and replace with South Witney.

Support the clarification of the role of employment land at Chipping Norton.
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<tr>
<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes</td>
<td>-</td>
<td>Cala Homes</td>
<td>1744</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 48</td>
<td>Support the changes to reflect the identification of land west of Downs Rd as an area of long term development potential including for additional business use.</td>
</tr>
<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1754</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 48</td>
<td>&quot;Eynsham is a key employment location and alongside Witney, Carterton and Chipping Norton, should cater for the bulk of demand for business premises within the District.&quot; Much of the capacity of the Oakfield industrial estate is under-used, and this is in part due to the lack of adequate road access via either the A40 (severely over capacity and congested for much of the day – see 9.5.12) or the B4449 (restricted by Swinford Toll Bridge so at a standstill at peak times – see 9.5.13).</td>
</tr>
<tr>
<td>MM780</td>
<td>North A40 Land Consortium</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2126</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 48</td>
<td>Proposed modification at paragraph 6.25 outlines that as part of the planned Garden Village to the north of Eynsham, a new science/business park of around 40 hectares will be provided to meet current and future long-term needs (including those beyond 2031). The Consortium agrees to the principle of providing employment opportunities in the context of a new settlement. Main Modification 50 relating to Policy E1 states that employment development at the proposed garden village north of the A40 will be taken forward through an Area Action Plan (AAP). The Consortium request comprehensive engagement with the Local Planning Authority and relevant stakeholders in the preparation of any such AAP. It is further proposed at paragraph 6.31a that detailed masterplanning of the site inform development of any proposed science/business park. Again, the Consortium request full and detailed engagement with the Local Planning Authority on such matters as appropriate.</td>
</tr>
<tr>
<td>MM157</td>
<td>Declan Haverty</td>
<td>Mr</td>
<td>Haverty</td>
<td>339</td>
<td></td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 48</td>
<td>MAIN 48, para 6.24: * The land already zoned for employment purposes on part of the former Parker Knoll site should be required to be used for that purpose, in accordance with the planning condition previously decided * It would be unfortunate, were that not to be the case, if residents of WODC / Chipping Norton did not place as great a reliance as they should on planning decisions being decided and implemented for the greater good of all</td>
</tr>
<tr>
<td>MM446</td>
<td>OxLEP Limited</td>
<td>Sarah Beal</td>
<td>Ms</td>
<td>Beal</td>
<td>1030</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 48</td>
<td>Support changes that identify the land west of Downs Road as an area of future long term development potential for Witney, including the provision of new land for business.</td>
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<tr>
<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
<td>-</td>
<td>Crest Strategic Projects</td>
<td>1431</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 49</td>
<td>Support the changes to reflect the proposed approach towards additional business land provision as part of the land east of Chipping Norton strategic development area and the West Oxon Garden Village strategic development area. 4.1 Policy E1 seeks to allocate 4ha of land at Carterton (corner of Monahan Way/Carterton Road) for employment uses, subject to the satisfactory relocation of the existing sports pitches that occupy the site. There is no explanation within the policy itself, or in the supporting text that sets out how this will be achieved. In absence of any strategic scale development within the Main Service Centre it is unclear how the Council expects that this objective will be achieved. 4.2 Until such an explanation is provided the aspiration within the policy is considered to be unrealistic and therefore ineffective; as such it fails the test of soundness.</td>
</tr>
<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1461</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 49</td>
<td>It is also of note that under policy E1 and clause 6.28, WODC seeks to allocate around 100Ha of employment land. This will accommodate around 7,500 jobs (based on 30 jobs per acre). Typically 50% of new jobs are on employment land and the rest are accommodated at existing premises. Therefore, about 15,000 jobs are catered for. As the total number of additional jobs expected is 7,900 under the SHMA, this seems excessive and inconsistent. In particular, it doesn't make much sense to provide significant employment land with the houses at the Garden Village in Eynsham if that site is intended to meet Oxford's unmet need. Although for sure if additional employment land were provided alone in the District (assuming there is a market), no houses at all would be needed here, as the District has too many homes for the number of jobs and population growth is in-migration driven and generated by house building itself.</td>
</tr>
<tr>
<td>MM743</td>
<td>East Witney Land</td>
<td>c/o Carter Jonas</td>
<td>c/o Carter Jonas</td>
<td>1773</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 49</td>
<td>The EWLC notes that Policy E1 has been amended to include an allocation for employment land to the West of Downs Road as an ‘area of future, long term development potential’. This further concentration of employment land to the west of Witney will perpetuate the imbalance in the Town between areas of residential development and employment land, exacerbating the problems of traffic trying to cross the Town. We believe that an allocation for mixed use development on Land off Jubilee Way would assist in addressing the aforementioned imbalance, providing local employment opportunities for existing residents, as well as for the new residents at East Witney and North Witney.</td>
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<tr>
<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
<td>-</td>
<td>-</td>
<td>1873</td>
<td>&gt; SECTION 6 -</td>
<td>The EWLC notes that Policy E1 has been amended to include an allocation for employment land to the West of Downs Road as an ‘area of future, long term development potential’. This further concentration of employment land to the west of Witney will perpetuate the imbalance in the Town between areas of residential development and employment land, exacerbating the problems of traffic trying to cross the Town. We believe that an allocation for mixed use development on Land off Jubilee Way would assist in addressing the aforementioned imbalance, providing local employment opportunities for existing residents, as well as for the new residents at East Witney and North Witney.</td>
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<td>MM752</td>
<td>Bloombridge</td>
<td>Bloombridge</td>
<td>Mr</td>
<td>Cutler</td>
<td>1925</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 49</td>
<td>proposed Garden Village to the north of Eynsham to guide this strategic mixed use development. However we consider that the Local Plan should make clear that the AAP will not include the allocation to the west of Eynsham, which proposed Policy EW1b states will be secured through a ‘masterplan’. The proposed modifications make clear that the two allocations will come forward separately with the Garden Village being self-contained and the land to the West of Eynsham creating a residential extension to Eynsham. For the reasons set out about in relation to early delivery and the also the scale of the allocation we do not consider that an AAP would be required to support the delivery of the land the West of Eynsham.</td>
</tr>
<tr>
<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>1926</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 49</td>
<td>Employment - Policy EI - Land for Employment</td>
<td>Support is given to the proposed MM49 in that it identifies additional employment land for allocation at Monahan Way in Carterton, however, it is not considered that WODC Policy EI supports the Town Council employment land allocation aspirations, particularly to the north. The Town Council supports residential and economic growth to the north of Carterton and promotes a strategic employment site immediately north of the B4477 and creating a new gateway to Carterton. However, the inclusion of land at North Carterton, Kilkenny Farm, would enable the provision of a further 5 hectares of employment for SMEs to the north of the town and respond positively to the Carterton Master Plan. This change is required to ensure local economic needs are being met.</td>
</tr>
<tr>
<td>MM374</td>
<td>Carillion Capita</td>
<td>Jeremy Flawn</td>
<td>Mr</td>
<td>Flawn</td>
<td>723</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 49</td>
<td>OCC P&amp;F supports the proposal to deliver 9 hectares of additional employment land at Chipping Norton, north of the London Road, and the proposal to deliver a 40 hectare science park at Eynsham north of the A40. These sites are in accessible locations and can be delivered without prejudicing the delivery of other proposals in the vicinity at Eynsham and Chipping Norton.</td>
</tr>
<tr>
<td>MM456</td>
<td>Sport England</td>
<td>Raymond Cole</td>
<td>Mr</td>
<td>Cole</td>
<td>1117</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 50</td>
<td>The policy suggests that the land should be allocated for development, ‘subject to relocation of existing sports pitches’. Sport England considers that this wording on its own may not be sufficient to secure satisfactory reprovision of these community sport facilities. Further amendments are required to the policy and these are suggested below. If the pitches and ancillary facilities are to be relocated then the Council should allocate a replacement site for these through the local plan and a site should be identified in the modifications to the plan.</td>
</tr>
<tr>
<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>Cala Homes (Chiltern)</td>
<td>1745</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC</td>
<td>Policy E1 - Land for Employment</td>
<td>The proposed modifications at paragraph 6.24 outlines that there is a shortage of available development land in Chipping Norton with just over 3 hectares identified, not all of which is available. As such the Plan seeks to</td>
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<tr>
<td>MM780</td>
<td>North A40 Land Consortium</td>
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<td>2127</td>
<td>GROWTH &gt; MAIN 50</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 50</td>
<td>Provide 9 hectares of business land at Chipping Norton which will be provided as apart of the Chipping Norton Strategic Development Area. CALA supports the proposed allocation of 9 hectares of employment land within the Land East of Chipping Norton Strategic Development Area. This is shown to be located on land to the north of London Road. This is seen to be the most appropriate location, close to existing employment uses, with good road frontage and ease of access.</td>
</tr>
<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td>767</td>
<td>GROWTH &gt; MAIN 50</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 50</td>
<td>Proposed modification at paragraph 6.25 outlines that as part of the planned Garden Village to the north of Eynsham, a new science/business park of around 40 hectares will be provided to meet current and future long-term needs (including those beyond 2031). The Consortium agrees to the principle of providing employment opportunities in the context of a new settlement. Main Modification 50 relating to Policy E1 states that employment development at the proposed garden village north of the A40 will be taken forward through an Area Action Plan (AAP). The Consortium request comprehensive engagement with the Local Planning Authority and relevant stakeholders in the preparation of any such AAP. It is further proposed at paragraph 6.31a that detailed masterplanning of the site inform development of any proposed science/business park. Again, the Consortium request full and detailed engagement with the Local Planning Authority on such matters as appropriate.</td>
</tr>
<tr>
<td>MM446</td>
<td>OxLEP Limited</td>
<td>Sarah Beal</td>
<td>Ms Beal</td>
<td>1031</td>
<td>GROWTH &gt; MAIN 50</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 50</td>
<td>Support the inclusion of text to reflect the increasing importance of Eynsham in relation to business land provision, including the proposed science park element of the West Oxfordshire Garden Village proposal.</td>
</tr>
<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>154</td>
<td>GROWTH &gt; MAIN 50</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 50</td>
<td>Is there really a need for a 40 hectare Science Park as part of the Garden Village, acknowledged as &quot;well in excess of what would typically be sought at a rural service centre&quot;? How does it compare in size to the other Science Parks around Oxford? Given that areas in the north and east of the Garden Village are prone to flooding, why not reduce the size of the Science Park and put more housing in the south-west? (Or move it to Carterton - see comment on MAIN 7, SWOC Table.)</td>
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<tr>
<td>MM780</td>
<td>North A40 Land Consortium</td>
<td>-</td>
<td>-</td>
<td>2129</td>
<td>GROWTH &gt; MAIN 50</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 50</td>
<td>Proposed modification at paragraph 6.25 outlines that as part of the planned Garden Village to the north of Eynsham, a new science/business park of around 40 hectares will be provided to meet current and future long-term needs (including those beyond 2031). The Consortium agrees to the principle of providing employment opportunities in the context of a new settlement.</td>
</tr>
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</table>
| MM786 | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs Jacobs | 2192 | GROWTH > MAIN 51 | Changes to the Distribution of Housing to allocate land at West Eynsham and a new Garden Village north of A40 at Eynsham to help meet Oxford’s unmet needs: MM 63 et al

We support MM51 which proposes provision of 40ha business land for a science park as part of the Eynsham Garden Village proposal.

Soundness Reason: Justified

The proposal would provide a source of high quality, knowledge-based jobs, offering existing and new local residents the opportunity to work close to where they live, allowing them to cycle or walk to work rather than by private car.

Businesses would be well-placed to capitalise on the site’s proximity to Oxford and there would be synergies with business and research activities elsewhere on the knowledge spine.

Trips to and from the business park could make use of the proposed rapid transit services and new park & ride facility planned on the A40 at Eynsham or by bus and rail from Long Hanborough station. |
| MM787 | Rachel Livingstone | Mrs Livingstone | 2230 | > SECTION 6 - SUSTAINABLE ECONOMIC GROWTH > MAIN 51 | Paragraph 6.31

Tourism and leisure activities such as walking, cycling and horseriding’. Please show me on your plan where you are putting measures in place for horseriding. Nothing in the plan/maps. High population of horse riders in a 2 mile radius all use this field. 12+ equestrian yards/70+ horses. Any large development should include ‘multi-user tracks’ to include horse riders. Quiet rural roads are getting busier as people use them as rat runs. Only going to get worse - through New Yatt and North Leigh. Countryside being swallowed up with housing causing country pursuits to be forced onto busy roads. |
| MM61 | NP | Mr Pearce | 553 | > SECTION 6 - SUSTAINABLE ECONOMIC GROWTH > MAIN 51 | MAIN 51, Para 6.31

Not sound

Is there really a need for a 40 hectare Science Park as part of the Garden Village, acknowledged as ‘well in excess of what would typically be sought at a rural service centre’? How does it compare in size to the other Science Parks around Oxford? Given that areas in the north and east of the Garden Village are prone to flooding, why not reduce the size of the Science Park and put more housing in the south-west? (Or move it to Carterton – see comment on MAIN 7, SWOC Table.) |
| MM61 | NP | Mr Pearce | 556 | > SECTION 6 - SUSTAINABLE ECONOMIC | MAIN 51, Para 6.31

Not sound |
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<tr>
<td>MM363</td>
<td>Oxford City Council</td>
<td>Ms Dell</td>
<td>688</td>
<td>GROWTH &gt; MAIN 51</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 51</td>
<td>Is there really a need for a 40 hectare Science Park as part of the Garden Village, acknowledged as ‘well in excess of what would typically be sought at a rural service centre’? How does it compare in size to the other Science Parks around Oxford? Given that areas in the north and east of the Garden Village are prone to flooding, why not reduce the size of the Science Park and put more housing in the south-west? (Or move it to Carterton - see comment on MAIN 7, SWOC Table.)</td>
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<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Mr Small</td>
<td>1103</td>
<td>Historic England</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MIN 35</td>
<td>Support: The City Council support in principle the allocation of a Science Park to complement the proposed housing allocations as part of Main Mod 51 and Para 6.31a. Objection: The development of a Master Plan for the Science Park presumably forming part of the Area Action Plan will be needed to provide sufficient guidance to ensure that the overall phasing of this development will take place in stages. This will ensure that this proposal complements other similar science related developments already allocated and coming forward for development in other areas such as at the Northern Gateway, Begbroke and Bicester.</td>
<td></td>
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<tr>
<td>MM446</td>
<td>OxLEP Limited</td>
<td>Ms Beal</td>
<td>1032</td>
<td>Historic England</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 52</td>
<td>Support the text for improved clarification and also to ensure that any new building is suitably located with regard to scale, the type of proposed use, accessibility and potential impact on character and amenity.</td>
<td></td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Mr Small</td>
<td>1059</td>
<td>Historic England</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 53</td>
<td>Historic England welcomes and supports the amendment to paragraph 6.41 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
<td></td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Mr Small</td>
<td>1061</td>
<td>Historic England</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 53</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN54 for the addition of “historic” as regards the potential interest of a building as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy.</td>
<td></td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1105</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 54</td>
<td>Historic England welcomes and supports the amendment to paragraph 6.59 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2294</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MIN 38</td>
<td>Section 6.60 Policy E4 – Sustainable Tourism Consider highlighting mental and physical benefits of active recreation and their role in contributing to public health priorities for reducing inactivity/obesity and improving mental health.</td>
</tr>
<tr>
<td>MM446</td>
<td>OxLEP Limited</td>
<td>Sarah Beal</td>
<td>Ms</td>
<td>Beal</td>
<td>1033</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 55</td>
<td>Support insertion of text to reflect the fact that it will always be appropriate to enhance ecological, landscape and heritage value.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1104</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 55</td>
<td>Historic England welcomes and supports the amendment to Policy E4 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1062</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MAIN 56</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN56 for its reference to the distinct and historic characters of the older town centres in West Oxfordshire and the emphasis on the conservation, enjoyment and enhancement of their historic environment, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
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</tbody>
</table>
| MM479         | Dr KWGray               | Dr              | Gray             |                  | 1201       | > SECTION 6 - SUSTAINABLE ECONOMIC GROWTH > MAIN 56 | The WODC Plan amazingly seems ignorant of the OCC 'West Oxfordshire Weight Limit Zone' which is in the process of implementation in 2017. Others at WODCare fully aware. Consequently:  
• New paragraph following 7.4b should read:  
  o This same Chipping Norton study showed that the introduction of a West Oxfordshire Weight Limit Zone which is in the process of being implemented by Oxfordshire County Council will also reduce the HGV traffic going through Chipping Norton by 30% |
<p>| MM375         | Charlbury Town Council  | Charlbury Town  | Mr               | Clarke            | 731        | &gt; SECTION 6 | Paragraph 6.84 – Town Centres |</p>
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<th>Respondent ID</th>
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<tr>
<td>Council Mr S R Clarke</td>
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<td>We welcome the inclusion of this proposed modification but we remain disappointed that no specific recognition has been given to the importance of Charlbury town centre given the town's increasing tourist role (e.g. as the district's only &quot;Walkers are Welcome&quot; town and its good transport links). This concern was raised in our response to the original Local Plan consultation in 2013 but has not been reflected in the current modifications.</td>
</tr>
<tr>
<td>MM18</td>
<td>RW Howard</td>
<td>Canon</td>
<td>Howard</td>
<td>21</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MIN 40</td>
<td>Min 40 I agree the need for a car parking strategy. Current proposals for a one way system as every September with improvements to Albion Street look deliverable and could move HGVs in large numbers. an improvement to the New Street parking with a second floor is essential</td>
<td></td>
</tr>
<tr>
<td>MM782</td>
<td>Universities Superannuation Scheme (USS)</td>
<td>C/O Deloitte</td>
<td>Adams</td>
<td>2136</td>
<td>&gt; SECTION 6 - SUSTAINABLE ECONOMIC GROWTH &gt; MIN 40</td>
<td>We write to set out that we consider the Local Plan to be unsound in regard to a proposed minor modification Min 40 - Paragraph 6.86. The minor modification updates paragraph 6.86 to state that the District-wide Parking Strategy (herein referred to as the &quot;Parking Strategy&quot;) has been prepared to investigate whether parking provision is meeting current needs and whether it will meet future parking requirements. The previous iteration of the Local Plan stated that work had commenced on the Parking Strategy. There is, however, no additional text as part of the minor modification setting out the findings of the Parking Strategy within this paragraph (6.86) or any other paragraphs within the Local Plan. The Parking Strategy has been published and is publicly available following a consultation in November 2016. It has identified a need for a substantial amount of new car parking across the Borough. For example, in Witney alone it has been identified that there is a need for 600 further car parking spaces until this figure does not take into account any future retail growth that may come forward within the plan period. This is an important emission as Paragraph 6.73 of the Local Plan states that the Council's retail evidence identifies capacity to support additional shopping floorspace in Witney in the medium to longer term and recommends that this strategy starts to plan for a phased extension to the town centre to accommodate new investment. The requirement could therefore be higher than the amount identified within the Parking Strategy. Furthermore, Local Plan Policy T4 - Parking Provision has not been updated to reflect the car parking needs identified within the Parking Strategy. While the Policy as previously drafted does state that the Council will work with partners to provide, maintain and manage an appropriate amount of off-street public car parking, particularly to support town and village centres and to address issues of congestion and air quality there is no reference to the scale of provision which is required and the implications. We consider that as this information is now available, the Local Plan should reflect this evidence which sets out that a significant amount of additional car parking is required. Furthermore, the Parking Strategy itself recommends a series of Policy Options to be taken forward e.g. review of parking standards and a review of potential sites for new and expanded car parks. The Local Plan is currently silent on the findings and the recommendations of the Parking Strategy. The Policy and text at Paragraph 6.86 as it stands is currently not justified as it does not reference that a substantial quantum of additional car parking provision will be required across the Borough. The wording of the Local Plan is therefore not effective at addressing this need. The requirement for additional car parking has been identified within the Parking Strategy and needs to be reflected in the Local Plan, given it is aligned...</td>
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with the most recent revisions to housing numbers. The evidence base has been provided and the findings should be reported given the implications.

In order to be found sound, the Local Plan should be updated to include the findings of the Parking Strategy and it should commit the Council to undertaking further work in this area. The Parking Strategy should identify that there is a requirement for additional car parking and how the Local Plan will seek to ensure that this is delivered. The Local Plan should specifically address the extent of the requirement which was previously not known. This will build on the positive work the Council has undertaken so far in commissioning the Parking Strategy and ensure that the shortfalls identified are addressed.
### SECTION 7 – TRANSPORT AND MOVEMENT

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<th>Respondent ID</th>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>Jacobs</td>
<td>2232</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MIN 41</td>
<td>...around 80% of commuting journeys being made by car.</td>
</tr>
<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>Marshall</td>
<td>1470</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 57</td>
<td>Policy T1- This states that new developments should be located where the use of the private car can be minimised and the use of walking, cycling and public transport maximised. We endorse this policy and note that the siting of any major new developments should have adequate access to public transport.</td>
</tr>
<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>Pearce</td>
<td>156</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 58</td>
<td>It is a curious (implicit) assumption that most of the new residents of the Garden Village will be walking to work in the new on-site business space, whereas the Village is specifically designed to meet Oxford City’s unmet housing needs. Many of the new residents will presumably have Oxford-based jobs. As for residents being “less dependent on travelling to other locations to fulfil their needs”, unless the Witney facilities are replicated in Eynsham and the Garden Village in toto, many more people will be travelling to Witney to shop and access other services.</td>
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<tr>
<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
<td>-</td>
<td>Cantay Estates</td>
<td>1936</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 58</td>
<td>Proposed modification- Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. The proposed ‘Garden Village’ is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification. The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process. A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all...</td>
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identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.

Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.

Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.

MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.

MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.

MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.

The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.

The anticipated delivery figures (Appendix 3) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.

While uncertainty exists as to the deliverability of a significant proportion of the required housing supply
questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.

MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt.

We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.

We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of
railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.

MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.

The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.

MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPFs encouragement of environmentally sustainable development.

The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use all together. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.

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<td>MM780</td>
<td>North A40 Land Consortium</td>
<td>-</td>
<td>-</td>
<td>2130</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 58</td>
<td>The Consortium generally supports the principle of providing a comprehensive mixed use development at the proposed garden village to the north of the A40 near Eynsham, including homes, business space, a transport hub, community facilities, education facilities and open space. The extent of any such provision should be agreed following extensive engagement between the Consortium, the Local Planning Authority, and any other relevant stakeholders.</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>558</td>
<td>&gt; SECTION 7 - TRANSPORT AND</td>
<td>MAIN 58, Para 7.18a</td>
<td>Not sound</td>
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>768</td>
<td>MOVEMENT &gt; MAIN 58</td>
<td>It is a curious (implicit) assumption that most of the new residents of the Garden Village will be walking to work in the new on-site business space, whereas the Village is specifically designed to meet Oxford City’s unmet housing needs. Many of the new residents will presumably have Oxford-based jobs. As for residents being 'less dependent on travelling to other locations to fulfil their needs', unless the Witney facilities are replicated in Eynsham and the Garden Village in toto, many more people will be travelling to Witney to shop.</td>
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<tr>
<td>MM357</td>
<td>Tony Bovey</td>
<td>Mr</td>
<td>Bovey</td>
<td>809</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 58</td>
<td>Notwithstanding strategic objection to Oxford satellites on the edge of the Green Belt, a self contained garden village should be strongly pursued so that, for example, the need to travel and vehicular impact on Eynsham road network are mitigated.</td>
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<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
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<td>Cantay Estates</td>
<td>1914</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 59</td>
<td>Proposed modification- Downgrading of Long Hanborough: The proposed modifications involve the downgrading of Long Hanborough from a service centre, to a lower order village. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN13, MAIN14, MAIN15, MAIN59, MAIN66, MAIN145, MAIN149. Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. We object to proposed modifications which suggests the downgrading of Long Hanborough from a rural service centre to a village. The submission plan confirmed the rural service centres were classified as such because they benefitted from a range of services and facilities which supported the village and surrounding area. They are able to support additional homes in the short-term, while proposed growth can enhance the role of the settlement in supporting the surrounding rural area (paragraph 4.18). This approach was directly in line with the plan’s objective 1 ‘strong market towns and villages’ and objective 4 ‘sustainable communities with access to services and facilities’, both of which remain un-modified. Long Hanborough retains the same services and facilities which existed at the time the plan was submitted, furthermore planning permission has been granted which allows significant expansion of the primary school (15/03341/FUL). While additional housing has been permitted no evidence has been produced to suggest additional homes would result in any harm to the character or sustainability of the settlement. The village therefore remains well placed to fulfill the role of a rural service centre.</td>
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The downgrading of Long Hanborough proposed through modifications is largely unexplained and not supported by any evidence. The Council cite the creation of a ‘new’ service centre through the northern expansion of Eynsham as justifying the downgrading of Long Hanborough as the new development will need to “develop a critical mass of services and facilities” (paragraph 2.5a).

We are concerned the Council’s explanation suggests an intention to restrict the development of Long Hanborough and reduce services in the village in order to encourage their replacement in the new development. A restrictive approach to development stifling an existing sustainable settlement and vibrant community is clearly at odds with the Plan’s vision, policies of the NPPF and good planning practice.

The provision of an additional service centre would be entirely in line with the Plan objectives. If the development proposed north of Eynsham is to proceed it is clearly preferable that Long Hanborough maintains its status as a service centre complementing any new facilities created. The need to retain the service centre is particularly pronounced due to the unclear deliverability of the proposed site north of Eynsham, even if the site is delivered this will not be until the latter part of the plan period, therefore there is a need for services and facilities in the interim.

The submitted plan set out clear objectives which the following policies sought to deliver sustainable communities. The Council seeks to deviate from this approach without explanation, evidence or proper assessment, we therefore believe this modification should be deleted.

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**MM756 Cantay Estates Cantay Estates - Cantay Estates 1952**

`> SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 59`

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

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**MM786 Oxfordshire County Council Amada Jacobs (OCC) Mrs Jacobs 2224**

`> SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 59`

The emphasis of this policy is only indirectly about sustainable transport. A suggested alternative title is: “Minimising the need to travel through sustainable development.”

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**MM97 Mr Grumpy Mr Sesicall 250**

`> SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 59`

The impact of the additional housing and the resulting population explosion does not seem to be properly catered for in transportation planning. The desire is for reduced reliance on private car, but this will only be achieved if it becomes untenable, which admittedly is likely since the public transport plans do not appear to address the real problems of today in terms of traffic numbers, never mind the extra burdens of all the extra housing.

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**MM116 Paul Mr Hughes 288**

`> SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 59`

**TRANSPORT:**

With the 10-11,000 new homes being built in Eynsham, Witney and Carterton I believe the road infrastructure in each of these towns/villages and along the A40 will be significantly worse in 2031 than it is now. When you also factor in the 40ha science park at Eynsham, as well as Oxford City Council’s plans at the ‘Northern Gateway’ near Wolvercote, the traffic volumes on the A40 don’t bear thinking about.

Sadly, there is little provision for public transport, except for the ‘park and ride’ at Eynsham, which will hardly help traffic in and around Eynsham! Anyone who uses the A40 daily knows...
that it is Eynsham and Cassington that cause many of the major issues and these two bottlenecks need looking at. I just don’t see how an east bound bus lane and dual carriageway between Eynsham and Witney will really help.

There will still be no rail link for Witney, Carterton or the new enlarged Eynsham to Oxford and beyond. Cars will continue to be used for the overwhelming majority of journeys and with many thousand of new houses that means many thousands of more journeys. This will also be the case for Chipping Norton and Woodstock. What are the plans for the effect of these journeys on air quality and climate change, as well as the upkeep of the roads themselves?

Rural bus services have recently been decimated by Oxfordshire County Council, so how will WODC help reduce car use in the many villages affected?

Where is the strategic vision to provide a comprehensive cycle network in West Oxfordshire?

Policy T1 - ‘Priority will be given to locating new developments in areas . . . where the need to travel by car can be minimized due to opportunities for walking, cycling and the use of public transport.’

Assuming 1400 ‘units’ are built in the North Witney development area and, at a conservative estimate, each one attracts two cars; that amounts to 2800 extra cars travelling on the already overcrowded roads.

Available employment in Witney cannot support that many residents so, travelling to and from Oxford or Abingdon will take even longer than it does already, and a bus lane will in no way address that particularly as there are few appropriate long stay parks to address commuting.

Main 59 Policy T1
There are no cycle ways in and out of Witney from Hailey Parish – you are about to destroy the delightful and much used footpaths that go through the proposed development making them unpleasant to use, and you have cut what little public transport there is.

Main 104 – Alternative Options for Strategic Growth at Witney

9.2.50

Land to the south of Witney which straddles the boundaries of Ducklington and Curbridge Parishes, whilst physically proximate to the town centre and main employment areas in the south is segregated from the town by the A40. There are concerns regarding noise, odour and landscape impact and unlike the alternative options, the scheme would not deliver any strategic highway improvements for Witney.

Policy T1 – Sustainable Transport Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.

Witney’s main traffic bottleneck is at Bridge Street. With an average of 29,000 vehicles a day, it is the only vehicular crossing of the River Windrush for local journeys and through traffic from the north and east. The constraint of the river combined with the level of demand for vehicular travel results in severe congestion, delays to buses and air pollution (it is already an Air Quality Management Area). The environment deters
The new A40/Down’s Road junction and A40/Shores Green improvements (Main 102) will significantly reduce traffic (and air pollution) in Bridge Street whereas the North Witney proposal combined with the recent successful applications on New Yatt Road (270 and 40 houses) will substantially increase traffic (and air pollution) in Bridge Street. Replacing North Witney with South Witney would potentially release £40m of S106 funding:

- Northern Distributor Road (£10m)
- West End Link road (£23.2m)
- Foul water drainage (£3m)
- Flood alleviation (£3m)

Main 47, 6.13

We will also work with Oxfordshire County Council to identify funding for their long term strategy for the A40 which will involve dualling between Witney and Eynsham and a westbound bus lane.

However, the £55m funding to facilitate the above long term strategy has yet to be identified. Selection of South Witney as an alternative to North Witney could be used to facilitate Oxfordshire County Council’s transport strategy outlined above to improve the A40 between Witney and Oxford. This proposed change of strategy would benefit substantially more residents than the existing strategy.

Other advantages to replacing North Witney with South Witney are:

- Traffic from South Witney would avoid the Bridge Street bottleneck (Air quality management area) on journeys into Witney.
- A South Witney development would be able to take advantage of the existing four way A40 junction at Ducklington and the proposed four way A40 junction with Downs Road, providing direct access to the main employment areas of Oxford, Witney and Carterton.
- Conversely the development of 1,400 houses at North Witney would significantly increase traffic in Bridge Street, even with the delivery of WEL2.

Remove North Witney from the Local Plan 2031 and replace with South Witney.

How telling that the aim to provide congestion-free roads has been deleted. Dualling the A40 all the way is surely the best way of eradicating congestion. True, the pinch point of Sunderland Avenue would need to be addressed, but if man can get to the moon, surely we have the nous to solve that problem. OCC’s own traffic survey showed that of eastbound car journeys leaving West Oxon., only 40% were going to Oxford, whereas 60% were going to elsewhere in Oxfordshire or to places in the south east. Therefore bus lanes to Oxford & Park & Rides are unlikely to help these drivers, whose main aim is to get past Oxford.

It is recognised that this medium term unfunded scheme for dualling the A40 between Eynsham and Witney may be insufficient in the longer term, necessitating the development of a separate public transport route. To that end the line of the old Witney - Yarnton Junction railway will be safeguarded from development along with any short deviations to by-pass the small number of developments made since the railway was closed.
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| MM457        | North Witney Action Group NWAG | North Witney Action Group (NWAG) | Mr | Neyroud | 1154 | > SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 60 | The current estimated infrastructure costs required to build North Witney SDA according to a note received in Nov 2016 from WODC's Planning Policy Manager are –  
- Northern Perimeter Road £6m  
- West End Link Road £23.2m  
- Foul Water Drainage Improvements £3m  
- Flood Alleviation £3m  
- Highway Improvements £4m  
\---  
£39.2m  
The North Witney SDA (incl West End Link) requires extraordinarily expensive infrastructure - “Due to the complexity of the site....” (Main 217)  
At £39.2m, this is a wasteful use of infrastructure funds, and shows a lack of joined-up thinking by WODC as well as non-cooperation with OCC in its endeavour to raise the £55m (Main 60) for A40 improvements. These improvements would be of major benefit to Witney residents not only in their commute to and from Oxford, but also locally. Firstly as recognising the A40 between Shores Green and Down's Road junctions as the ‘Witney by-pass’ between east and south housing areas, and secondly as a designation of the west side of Witney as the main area of employment. |
<p>| MM741        | CPRE Oxfordshire | Helen CPRE Oxon | Mrs | Marshall | 1456 | &gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60 | Clauses 7.26 &amp; 7.27b indicate that there is a funding shortfall. The reliance on developers noted in 7.28 would seem hopeful and CPRE would question whether the funds expected from planned allocations will actually meet the shortfall. Certainly, the improvements will take some time and are likely to be behind the curve. |
| MM741        | CPRE Oxfordshire | Helen CPRE Oxon | Mrs | Marshall | 1473 | &gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60 | Clauses 7.23 and 7.27 A40 congestion- We note that the capacity of the roundabouts at Wolvercote and Cutteslowe are cited as the major cause of congestion and that the traffic lights and junctions at Eynsham and Cassington are also contributory factors. We would dispute this analysis; the upgrading of the roundabouts at the east end of the route has, at least temporarily, eased some of the congestion there while the major obstacles at Eynsham and Cassington remain. The scale of building proposed for Eynsham, Tilgarsley Garden Village, Witney and Carterton, all feeding on to the A40 and the siting of the proposed park |</p>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
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<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60</td>
<td>and ride are all likely to increase congestion on the western stretches of the route.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>158</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60</td>
<td>Where will the new strategic link road from the A40 to the A44 be inserted - still near Wolvercote roundabout? Wherever it goes, there will be yet another blockage, probably in the form of a busy roundabout, on the A40, slowing down eastbound traffic, including buses.</td>
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<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
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<td>Infrastructure &amp; Costs</td>
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<td>- Northern Perimeter Road £6m</td>
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<td>- West End Link Road £23.2m</td>
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<td>The North Witney SDA (incl West End Link) requires extraordinarily expensive infrastructure estimated at £39.2m, and WODC admits it is - &quot;Due to the complexity of the site....&quot; [Main 217].</td>
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<td>This is a wasteful use of considerable infrastructure funds, with other rejected SDA's in West Oxfordshire either much better located, in greater need of housing, or both.</td>
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<td>This demonstrates a lack of joined-up thinking by WODC as well as non-cooperation with OCC in its endeavour to raise the £55m [Main 60] for the county's much needed A40 improvements ( including a full 4-way junction at Shores Green). These would be of major benefit to Witney residents not only in their commute to and from Oxford, but also locally. Firstly as recognising the A40 between Shores Green, Duxlington and Down's Road junctions as the 'Witney by-pass' between east, south and west housing areas (avoiding the Town centre and the critical AQMA of Bridge St), and secondly as a recognition of the west and south sides of Witney as the main areas of employment.</td>
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<td>MM743</td>
<td>East Witney Land Consortium</td>
<td>c/o Carter Jonas</td>
<td>c/o Carter Jonas</td>
<td>1774</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60</td>
<td>The EWLC supports measures to address congestion on the A40. We note that in paragraph 7.27, the Plan refers to the proposed Park and Ride bus service, which will start at</td>
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<td>Josmond Mr Osmond 18</td>
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<td>MOVEMENT &gt; MAIN 60</td>
<td>Eynsham, providing a service to Oxford. The Plan is unsound because it is not justified. The strategy for Park and Ride provision is not based on the most appropriate strategy, considered against the reasonable alternatives. As set out in previous representations, we suggest that land at East Witney could be used for a Park and Ride service to Oxford. This would have the added benefit that it would be located before the carriageway narrows to a single lane in each direction on the approach to Oxford, catching commuters early, and reducing traffic on single carriageway stretch of the A40.</td>
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<td>MM751</td>
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<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60</td>
<td>Main 60: An additional 600 houses in CN will generate significant traffic with a large proportion (to be determined and not estimated in the report). If one assumes 75% of the home owners attempt to drive into Oxford, the Oxford portal, and Woodstock might expect 450 more cars driving through them, on top of the already agreed increase in traffic. These significant further increases on the original plan are just that - significant - and one would expect a plan of this kind to be detailed and specific on this aspect of infrastructure. It is clear that the Oxford Northern Portal recent improvements have done little to significantly improve the journey into Oxford and that the 2400 homes (gross figure including the increase) will generate yet more traffic with associated environmental impacts including pollution and noise</td>
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Amendments to Paras 7.27-7.27b provide a summary of the improvements proposed along the A40 and notes that improvement in capacity may be achieved and that the current junction at Eynsham is a contributory factor. We would suggest that the new junction to the proposed Park & Ride facility to the north of Eynsham should also be utilised to provide access to the allocation to the west of Eynsham to avoid creating more than one new access to the A40 principal route, to maximise accessibility to the Park & Ride site and to manage the way that new development traffic accesses the main road network to ensure that this does not contribute to any further issues to the capacity of the network. We appreciate the views of the community expressed in the Autumn 2015 consultation ‘Investing in the A40’ and we recognise the need to future proof A40 access design proposals to accommodate a future possible westbound bus lane and possible future dual carriageway along this section of the A40. We understand that there will be ‘funding gap’ issues associated with the delivery of new strategic infrastructure and we will work with the Highway and Planning Authorities to identify necessary measures to mitigate the impact of development traffic and where appropriate contributions to strategic transport improvements that would be of wider benefit to the local community. We assert the land to the west of Eynsham could provide necessary funding contributions to deliver an appropriate standard of link road and to provide and enhanced junction to the A40, including the Park & Ride facility and note that the council have been considering funding options for this these. MAIN 65 Para 7.54 also notes the proposed Park & Ride facility at Eynsham will be delivered in conjunction with improvements to the A40. MAIN 156 Paras 9.5.40x-9.5.40y explains the benefit to the community of providing the West Eynsham SDA link road to give additional journey choice and to remove unnecessary through traffic. These paragraphs also note that appropriate consideration will need to be given to the connection to the A40 and to the Garden Village to the north. We assert the land to the west of Eynsham could provide necessary funding contributions to deliver an appropriate standard of link road and to provide and enhanced junction to the A40, which would support the delivery of the infrastructure required for the Park & Ride facility, particularly for non-car modes of travel from the wider Eynsham village. Development of the Site in the short term can respond to the identified housing need and also enable the early delivery of essential infrastructure for the West Eynsham SDA, co-ordinated and closely designed with the evolving work on the 2017 planning application by Oxfordshire County Council for the Park & Ride site. The pre-submission version of the Neighbourhood Plan for Eynsham is currently out for consultation until the
31st of January 2017. The emerging Neighbourhood plan seeks to accommodate the proposed growth set out in the Local Plan, including the proposed modifications. Of importance Proposed Policy ENP17 covers the western expansion area, point A) of the policy states: "Development west of Eynsham shall have vehicular access from the A40 at only one point". The supportive explains that the single access point will be achieved through the consolidation of junctions. The Site Options Assessment which supports the pre-submission version of the Neighbourhood Plan sets out preferred details of how this access can be achieved, Maps W1, W2 and N1 all show one consolidated access point to the north of the Site. An extract of Map W1 is below (see original representation).

Gavin Barwell’s written ministerial statement on 12th December 2016 gives further support and weight to the Neighbourhood Planning process. We consider it is vital that the access aspirations for the western expansion area, as set out in the emerging Neighbourhood Plan accord with the emerging Local Plan. We request that the Local Plan be amended to reflect this and further exploration of the issue be considered in the hearings to ensure that the Plan is robust and effective in this delivery on this point.

Proposed modification- Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City’s unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149 Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.

The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making.

The proposed ‘Garden Village’ is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification.

The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process.

A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.

Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is
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|               |                         |                 |                  |            |                   | **achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.**
|               |                         |                 |                  |            |                   | **Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.**
|               |                         |                 |                  |            |                   | **MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.**
|               |                         |                 |                  |            |                   | **MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document.**
|               |                         |                 |                  |            |                   | **The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.**
|               |                         |                 |                  |            |                   | **The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required.**
|               |                         |                 |                  |            |                   | **While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.**
|               |                         |                 |                  |            |                   | **MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a**
|               |                         |                 |                  |            |                   | **The proposed modification identifies the proposed expansion north of Eynsham to be an ‘exemplar’ development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.**
|               |                         |                 |                  |            |                   | **The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.**
|               |                         |                 |                  |            |                   | **The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions.**
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|               |                         |                 |                  |            |                   | **MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a**
We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment.

We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.

MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council's own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide
Main Modification 60, Paragraphs 7.23-7.28

The University & Colleges note that the County currently propose to dual 3.5km of the A40 between Eynsham and Witney at a cost of £54m, which will be subject to ongoing discussion and analysis. Ensuring the delivery of sufficient transport capacity in this key transport corridor to accommodate future levels of commuting and other journeys to Oxford is essential if the Local Plan strategy is to be effective in contributing to meeting the housing needs of the City. The importance of the route is specifically identified in paragraph 7.23: 'The A40 is the main east-west transport route with congestion on the section between Witney and Oxford being amongst the most severe transport problems in Oxfordshire and acting as a potential constraint to economic and housing growth.'

At present the County Council is undertaking consultation on the ‘A40 Eynsham Park and Ride and Bus Lane Scheme’. Paragraph 7.27a, b and c need to be updated to reflect this latest consultation and the overall status of the proposed improvements.

Furthermore, as stated in reference to MM 15 & 16 above, the current high levels of congestion on the A40...
need to be addressed if the proposed Garden Village at Eynsham is going to be able to operate as an extension of the Oxford housing market and therefore contribute towards meeting the needs of the City. However, dualling alone is unlikely to solve the problem of accessing Oxford on the A40 corridor and would be likely to generate induced demand and simply attract more vehicle trips to the network, such that the new highways capacity rapidly fills and congestion returns. The University & Colleges consider a more balanced solution is required including a range of sustainable modes as well as improvements to highway capacity.

The University & Colleges therefore request that there is a clearer commitment to the delivery of improved sustainable transport infrastructure for the A40 corridor. It is noted that the latest reports for the meeting of the OGB dated 30th November 2016 state that the A40 Eynsham Park & Ride and Bus Lane Scheme will be delivered in the period 2018-2020. It is proposed that this wording is carried forward into the Local Plan.

It is noted that proposed and anticipated improvements to existing highways capacity to the A40 connecting Witney and Oxford are subject to ongoing discussion and analysis. The Consortium welcomes further progress updates regarding the proposed schedule of improvements to the A40 in due course. It is further requested that the potential implications of any proposed network improvements to development north of the A40 near Eynsham are made suitably clear.

At paragraph 7.43e, it is noted that the garden village proposal is at a very early stage and that potential strategic or infrastructure improvements have not yet been determined. It is requested that engagement between the Consortium, the Local Planning Authority, and other relevant stakeholders inform any such highways improvements or enhancements.

Improvements to Wolvercote and Cutteslowe roundabouts were completed in Autumn 2016.

Paragraph 7.27a.

Trains/tram is the way to go and additional road lanes will still meet pinch points at Cassington, Eynsham. There will be more traffic but the same pinch points. How can the Council afford to widen roads when they can’t fix the ones we already use?

Paragraph 7.24.

‘Displacement of traffic on A4095’. How would this stop anyone from the North Witney development going through New Yatt and North Leigh? This is already used as a ‘rat-run’ another 1,400 houses will make it worse. This road is used by cyclists, horseriders and runners, it’s dangerous now even more so with this development.

How the transportation needs are addressed needs to be part and parcel of a comprehensive development plan. At best the current proposed solutions look to be attempting to address existing issues with sticking plaster and not really strategic and sustainable based on the probable number of extra commuters. I have not seen any models that may have been used to see the journeys currently taken and how the proposed solutions will tackle these and the anticipated increases. It looks like a solution based on what is thought to be feasible/affordable to do, ignoring the perceived too difficult like re-instating railway lines or other mass
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<tr>
<td>MM61</td>
<td></td>
<td>NP</td>
<td>Mr Pearce</td>
<td>559</td>
<td>MAIN 60, Para 7.27</td>
<td>Not sound</td>
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<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60</td>
<td>Where will the new strategic link road from the A40 to the A44 be inserted – still near Wolvercote roundabout? Wherever it goes, there will be yet another blockage, probably in the form of a busy roundabout, on the A40, slowing down eastbound traffic, and buses. Para 7.27a Not sound What happened to the sensible suggestions of a train or tram service from Witney to Oxford? And why not go on to Carterton? What about a congestion charge for Oxford City, or parking charges for businesses? You have to make public transport more attractive economically, as well as more convenient, for it to make a real difference to traffic density.</td>
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<td>MM373</td>
<td>Gloucestershire County Council</td>
<td>Robert Niblett</td>
<td>Mr Niblett</td>
<td>710</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60</td>
<td>The following concerns regarding transport/highway matters are raised for your consideration and arise mainly, but not exclusively, from the overall strategy set out in the Proposed Modifications. Access to and from West Oxfordshire to Gloucestershire is along two local authority routes: A40 – Oxford to Cheltenham – now identified as part of the Major Road Network between Oxford and A417. The road is classified as having limited access around Witney and Eynsham a centre of the proposed growth. It is classified as a primary link within Gloucestershire which is critical to the local economy. It typically has been 10,000 to 15,000 daily vehicle movements. Scale of growth potentially impacting route: * 12,000 dwellings * Witney sub-area 4,400 homes * Carterton sub-area 2,600 homes * Eynsham – Woodstock sub-area 4,000 homes * Burford – Charlbury sub-area 1,000 homes * 60ha of employment * An additional 20ha west of Witney * 40ha campus science park as part of the Garden Village north of the A40 at Eynsham We have concerns over the scale of growth being proposed along this strategic route if the impacts of the additional vehicle demand are not fully mitigated. At the moment the A40 is generally free flowing between Oxford and Cheltenham and it is assumed very little residential traffic will travel west to access employment. However, without suitable mitigation measures to restrict car use accessing Oxford vehicle delays will be more prevalent impacting the Central Severn Vale’s connectivity with Oxford through greater journey time unreliability. The A40 is also likely to provide the extension of the proposed Oxford / Cambridge Expressway to access the</td>
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The A40 forms part of GCC's Advisory freight map. We would expect to be consulted on proposed construction management plans where the construction of these sites impacts the operation of the A40. This is essential to reduce the impact of inappropriate routes. It is also important to coordinate freight information through our Freight gateway system.

Direct rail access is not currently provided between the Central Severn Vale and Oxford – a new direct rail connection linking the Central Severn Vale to Oxford via Honeybourne might be something to consider in the long-term to maintain connectivity between these centres. Substantial investment will be required at existing stations along the North Cotswold line to encourage and facilitate greater use of rail services arising from the new development as well as meeting the ongoing demand that continues to increase. Providing quality bus services connecting stations to new and existing development will be critical in reducing car usage in the area.

A44 – Oxford to Evesham – is no longer identified as part of GCC advisory HGV route. The route is identified as a District Link which is critical for local access. It typically has been 6,000 to 10,000 daily vehicle movements.

Scale of growth impacting route:

* Chipping Norton sub-area 2,400 homes
* 9ha east of Chipping Norton as part of the Strategic Development Area

We have limited concerns over the scale of growth being proposed along this strategic route. However, if the impacts of the proposed growth along the A40 corridor are not mitigated freight may switch to using this route when accessing Evesham. This will cause additional vehicle problems at Moreton-in-Marsh one of the Cotswold’s leading attractions.

<p>| MM376 | Stagecoach in Oxfordshire/Stagecoach West | Nick Small, Stagecoach Bus | Dr Small | 776 | MAIN 60 paragraphs 7.23-7.28 A40 Improvements | Stagecoach notes and supports the amendments that accurately reflect the current situation. Stagecoach note and supports the principle that developer funding might be secured to help bring forward the Phase 2 improvements to the A40 between Witney, Eynsham and Oxford along the A40, while recognising that the cumulative burdens on development viability will unavoidably limit how far such improvements could be developer-funded. |
| MM357 | Tony Bovey | Mr Bovey | 810 | &gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60 | 7.23, Highway improvements of A40 corridor: it is doubtful if the improvements would be sufficient to enable sustainable and equitable travel for the proposed Eynsham growth, especially when the Northern Gateway will generate even more traffic through the A40 roundabouts. 7.27 : the A 40 cycleway should be protected and enhanced and the Eynsham -Botley cycleway should be built. Bus priority should be secured beyond Duke's Cut into Oxford, including access to employment sites in Headington and east Oxford. |
| MM45 | Nigel Rose | Mr Rose | 90 | &gt; SECTION 7 - TRANSPORT | Although mention is made of suggested, currently unfunded, improvements to the A40 between Witney and Eynsham, it has to be recognised that the route will still be subject to the congestion problems nearer to |</p>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2233</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 60</td>
<td>AND MOVEMENT &gt; MAIN 60 Oxford. Also because of the problems created by any perturbations, the only reliable long term solution will be to re-open the old railway line between Yarnton Junction and Witney to a Park &amp; Ride south of Witney town centre, in a similar manner to the re-opening of the Borders Railway in Scotland between Edinburgh, Galashiels and Tweedbank P&amp;R, which has proved very successful and to be carrying many more passengers than predicted. A re-opening of the Witney line will provide direct rail access to the economic growth areas in Oxfordshire and beyond and to Heathrow Airport. To this end the line of the old railway should be safeguarded from development along with any necessary deviations around developments that have occurred since the railway was closed.</td>
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<tr>
<td>MM457</td>
<td>North Witney Action Group NWAG</td>
<td>North Witney Action Group (NWAG)</td>
<td>Mr Neyroud</td>
<td>1330</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 61</td>
<td>The 2014 Ducklington Lane/ Station Lane/ Thorney Leys scheme increased junction capacity, reduced congestion, and improved traffic flow. Witan Way remains congested at peak times.</td>
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<td>MM457</td>
<td>North Witney Action Group NWAG</td>
<td>North Witney Action Group (NWAG)</td>
<td>Mr Neyroud</td>
<td>1334</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 61</td>
<td>WODC continues to position WEL as the second river crossing for Witney, when OCC’s LTP4 determines that the Shores Green junction upgrade becomes the second river crossing (OCC LTP4 WIT1), with WEL not even specified in LTP4 WIT1. Furthermore, Shores Green upgrade is not currently fully funded (9.2.34a), and OCC would look to WODC to assist in providing funding. Additionally, the Inspector (Frances Mahoney) at the Gladman/Burford Rd planning appeal (14/1215/P/OP) in her final report, para 318 wrote, &quot;The Council is clearly committed to the SGSR scheme and sees it as a primary solution to the problem of air quality and highways congestion within Witney.&quot; The Secretary of State granted planning permission and agreed a £1.16m contribution towards the SGSR scheme. (Para 16) Alarmingly, Main 113, 9.2.58 removes the onus from the developers of North Witney SDA from their responsibility of delivering WEL to a mere facilitation role. In doing so WODC has left itself vulnerable to the full funding of the (currently) £23.2m West End Link Road which is &quot;needed to enable the proposed development of land to the north of Witney&quot; (Local Plan CD1, 7.36) Atkins Technical Note, Evaluation of Traffic Impacts, 4.2, Table 13 says - &quot;West End Link 2 (WEL2) - standard junctions - West End to Mill Street link road/bridge&quot; This reference to the use of ‘standard junctions’ (and thereby excluding Higher Capacity Junctions) does not appear to be mentioned anywhere else in any of the latest submitted evidence, including ‘Main Modifications’. Given that WODC TRA1 contains up to 50% of text and data comparing ‘Higher Capacity Junctions’ (HCJs) with ‘standard junctions’, NWAG is confused as to whether WODC has now permanently abandoned the idea of using HCJs at each end of WEL, or whether they have been temporarily excluded from the Evaluation of Traffic Impacts report for some other ungiven reason(s). This is of critical importance because, as pointed out by WODC in TRA1, using HCJs has a significant impact on traffic around the WEL area, and therefore would be expected to have a direct bearing on the outcome of tables 8 and 9 in the Evaluation of Traffic Impacts report. A Freedom of Information Request was submitted by NWAG to OCC on November 17th 2016. It requested a copy of the raw data used to produce the traffic flow in the Evaluation Report in order to establish the</td>
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situation within Witney around the WEL area.

The response (11030 EIR - Traffic Flow Figures) received from OCC dated December 14th 2016 was-

"The report/work so far has not included outputting the raw data from the traffic model, which would incur a significant fee to extract."

This is an extremely unhelpful response in a situation where NWAG are attempting to analyse data presented in a macrocosmic format, where multiple options have been added, dropped and altered and where close analysis of the raw data has previously revealed a quite different outcome than the technical reports would indicate.

Furthermore, it is beginning to become apparent that the important decisions being made on critical issues (eg infrastructure, sequencing and timing) are being relaxed by WODC, in order to accommodate the flawed North Witney SDA.

The second bullet point of paragraph 7.32 addresses the Shores Green Slip Roads, and states that:

'...facilitated by the proposed East Witney Strategic Development Area."

Similarly, the second bullet point of paragraph 9.2.58 states that the Shores Green Slip Roads will be "...facilitated by new development including primarily the proposed East Witney Strategic Development Area."

We would suggest that the wording in paragraph 9.2.58 is more appropriate, as it recognises that other developments will contribute towards the delivery of this new infrastructure. A significant financial contribution (in excess of £1m) has already been secured towards this new transport infrastructure from a scheme off the Burford Road, Witney. Indeed, we would suggest that the Local Plan should commit to seeking further financial contributions towards the Shores Green Slip Roads from any proposed allocations or future windfall sites that would impact on traffic movements in the vicinity, including on Bridge Street.

This proposed main modification is supported in so far as it clarifies that the North Witney SDA will facilitate the delivery of the West End Link.

The proposed main modification to paragraph 7.33 however states that:

"LTP4 envisages that [the four identified strategic highways schemes in Witney] will come forward sequentially with the Ducklington Lane improvements happening first (now completed) followed by the A40/Downs Road junction followed by the Shores Green Slip Road scheme and associated improvements at Bridge Street. Whilst not specified in LTP4, the inference is that the West End Link and Northern Distributor Road would follow on from these other strategic highway improvements..."

We object to the sentence underlined above as it could be misconstrued as suggesting that neither the West End Link nor the Northern Distributor Road should come forward until both the Downs Road junction and Shores Green Slip Roads have been delivered. There is no reason in transport terms however why either the West End Link and/or the Northern Distributor Road could be brought forward alongside other necessary supporting infrastructure. Indeed, as it forms the main spine road throughout the North Witney SDA, the Northern Distributor Road will be delivered in phases as part of the SDA itself.

To avoid any potential cause for confusion, we therefore request that the sentence underlined above be...
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| MM365 | Shilton Road Burford Group | Richard Shute | Mr | Shute | > SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 61 | **Access to Carterton – Improvements to the B4477 and west facing slips on the A40 at Minster Lovell.**  
We should like to see greater importance given to the provision of west facing slips on the A40 with the B4477 at Minster Lovell and to the upgrading of the B4477 to ‘A road’ standard. Carterton is an important town and its status is set to grow still further as a result of the local plan. It therefore warrants proper ‘A road’ connectivity for traffic from both a westerly and easterly direction. This would markedly increase the capacity and safety of the road and improve the environment for neighbouring towns and villages, relieving them of commuter and service traffic which today use a variety of alternative minor roads.  
As an example, Shilton Road (B4020), Burford, has seen passenger car and commercial vehicle numbers increase as a result of new housing in Carterton. The number of supermarkets has grown and the strategic heavy lift facility at neighbouring RAF Brize Norton generates more HGV traffic.  
Shilton Road (B4020) is the main route into Carterton and Brize Norton from the west. Traffic leaves the A40 near Burford roundabout and follows a twisty route which includes the hazardous dip at the entrance to Shilton village. West facing slips on the A40 would improve the environment for residents of Burford, particularly those on Shilton Road, as much of the traffic going to Carterton / Brize Norton from the west would use the improved Minster Lovell junction.  
Both the westerly slips and ‘A road’ improvements feature in the OCC document "Connecting Oxfordshire" but neither formed part of the Local Growth Fund Scheme. We should like to see this changed and for the draft local plan to promote these investments in anticipation of the extra traffic the planned housing will bring to the locality. |
| MM376 | Stagecoach in Oxfordshire/Stagecoach West | Nick Small, Stagecoach Bus | Dr | Small | > SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 61 | **Stagecoach notes and supports the revisions necessary to ensure that the full suite of policy in the Plan is consistent with and supports the revised Plan strategy** |
| MM399 | Hailey Parish Council | Graham Knaggs | Mr | Knaggs | > SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 61 | **Main 61 Sustainable Transport**  
7.32 West End Link – the provision of a new road link between Woodford Way and West End creating a second river crossing for Witney. Delivery will be facilitated by the proposed North Witney Strategic Development Area (SDA)  
Main 102 9.2.48  
... Delivery of the bulk of development in the medium to long-term would however offer the following advantages: - ensure the transport impact of the scheme is minimised by allowing for the new A40/Down's Road junction and A40/Shores Green improvements to come forward first;  
* allow time for the east and west Witney schemes to come forward in advance (and hereby avoid market saturation in the Witney area);  
* allow for the West End Link element of the scheme to be phased in appropriately as an integral part of the development. |
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<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2234</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MIN 46</td>
<td>We believe that the above changes of wording weakens the probability of delivery and would like to see a return to the original commitment to deliver the West End Link ahead of the majority of development coming forward. Previous failed promises to deliver an additional river crossing have sensitised us to this issue. If 1,400 houses are built, it is critical that the West End Link or any other river crossing is delivered (along with the Northern Distributor Road). Conversely, if North Witney is not built there is no need to build the West End Link / Northern Distributor Road. Remove the above modifications in Main 61 and Main 102 and revert to the original wording to retain some strength in the commitment to deliver the West End Link road.</td>
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<td>MM45</td>
<td></td>
<td>Nigel Rose</td>
<td>Mr</td>
<td>Rose</td>
<td>107</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>When the Local Plan was originally developed, it made sense to concentrate housing developments in the three market towns. However, it is not appropriate to merely extrapolate the original allocations to take the additional numbers required by the Inspector and the SHMA. In particular, it is not sustainable to allocate an additional 800 homes to the Chipping Norton SDA. The percentage of residents employed locally has been falling steadily over the last decade and is now below 30%. Employment growth in the County is centred on the ‘knowledge spine’ running from Bicester through Oxford to the South. Chipping Norton is too inaccessible to attract significant potential employers, who will want to locate near the clusters along the spine. The main employment locally is for ‘minimum wage’ jobs in retail and caring sectors. New residents looking for professional or technical jobs will be forced to commute by car using the sub-standard A44 towards Oxford or the more dangerous A361 towards Banbury. The bus service to Oxford only runs hourly and has to cope with the severe congestion in the Wolvercote roundabout area. Access to the North Cotswold railway line at Kingham is also difficult - the connecting bus service is now sparse and unreliable following the County Council cuts, not as implied in para. 7.58. The additional 800 homes must be allocated nearer to Oxford with easy access to a railway line, thereby linking easily to the main employment areas in the County. The modified Plan already picks up on this logic, by proposing the Eynsham garden village with good links to Hanborough station (and with the potential to be eventually linked to a re-opened railway line to Witney) and with employment areas nearer to the ‘knowledge spine’ clusters. The Chipping Norton “800” should therefore be reallocated to the Eynsham area or sites even nearer to Oxford, with a start date earlier than the 2021 proposed for the garden village. The Chipping Norton Eastern Link Road proposed as part of the Tank Farm SDA will not achieve the reduction in HGVs through the town centre - the vast majority of HGVs are on the A44 towards Evesham, not on the A361. The link road will be a “road from nowhere to nowhere”. The money on the link would be wasted and reduce the likelihood of achieving a proper Chipping Norton by-pass on the A44. The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.</td>
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<td>MM628</td>
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<td>Peter Godfrey</td>
<td>Mr</td>
<td>Godfrey</td>
<td>1430</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT</td>
<td>The proposal to build an A361 Relief Road as part of the “Tank Farm” development sounds a sensible idea but to me it appears; * Ill thought and misleading regarding its viability, * Unlikely to ever be economic for any prospective house builder to fund, costing in excess of £8M (based on...</td>
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| MM16          |                        | Josmond         | Mr Osmond       | 17         | > MAIN 62          | figures extrapolated from the WYG Traffic Planning Report - see below for more explanation) * Purports to relieve the A361 "through traffic" which any Chippy resident will tell you is NOT our fundamental problem. * Fails to identify the growing concern and action being taken by the Burford Action Group in their attempt to ban HGV's from their historic town centre and by implication the A361 to and from Chippy, therefore bringing into question the Councils contention that an A361 relief road would reduce HGV traffic by an average of 40% during peak periods (Ref para 7.43b Draft Local Plan). * Fails to address the fundamental traffic/pollution issues of through traffic on the A44, particularly HGV's, which are responsible for 66% of noxious gas pollution (ref - West Oxfordshire D.C. Air Quality Action Plan). * Makes no mention of the County Council’s Local Transport Plan 2015 - 2031 which states, "In the case of Chipping Norton, a scheme to change the status of the A44 would be required before a new environmental weight limit could be considered. In line with policies 4 and 29 of the Local Transport Plan, taking note of Table 2 of the LTP, we will seek to remove the primary route status on the A44 between Oxford and Moreton-in-Marsh. This would open opportunities to reduce HGV movements through Chipping Norton and address the air quality problems. However, as with weight limits, this would need to be funded through development and/or the local community, businesses and the town council."

The above paragraphs (7.43A & B), of the West Oxfordshire Council's redrafted Lol Plan are based on a report commissioned by Oxfordshire County Council and undertaken by WYG Transport Planning which is, to say the least, a simple exercise made unnecessarily lengthy and intricate in the way it is presented and fails to consider the most obvious solution to an A44 by pass.

The Report considers an upgrading of the Roll right Lane from the Greedy Goose crossroads to the A3400, together with further upgrades to the A3400 to where it meets the A361 roundabout, north of Chipping Norton (a distance of 6.5 Km). It concludes the cost at £18.15M is both too costly and unacceptably lengthy for vehicles, especially HGV’s, even suggesting that HGV’s would flout any weight restrictions imposed through Chipping Norton as the likelihood of being monitored and fined would be far less than any increase in fuel costs. What hope have residents got if the Authorities already accept failure of the legal processes.

The Council contends that HGV volumes through Chippy can be reduced, once the Relief Road is built by introducing “appropriate HGV restrictions” (Ref para 7.43b Draft Local Plan), yet the report produced by WYG Transport Planning clearly believes that HGV’s would flout any restrictions, considering them to have little effect, with only derisory fines if they were ever caught. Thus questioning the Council’s contention that HGV volumes could ever be reduced by apparent ineffective restrictions.

<p>| MM738 | Cala Homes Chiltern | Cala Homes (Chiltern) | - | 1729 | &gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62 | Main 62: The amendment to the plan suggests that a proposed Eastern Relief Road skirting the SDA together with &quot;appropriate&quot; but undefined HGV restrictions &quot;might&quot; reduce HGV traffic in the HighStreet. Traffic surveys suggest that as little as 30% HGV traffic will use the Eastern Relief Road - it is not the main issue in CN - and the report does not state what the measures would be or how they would be implemented or enforced. The issue of traffic and air quality in the Town is significant and one would expect a plan of this kind to be more specific on this issue in particular. The Eastern Relief Road does appear to be a solution to the wrong and smaller problem. |
|        |                        | Cala Homes (Chiltern) | - | 1729 | &gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62 | Paragraphs 7.43a and 7.43b CALA supports the increase in the size of the housing allocation at the Chipping Norton SDA. It also supports the provision of an eastern link road, recognizing the benefits that this could bring to improve air quality in Chipping Norton Town Centre. |</p>
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<tr>
<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>1730</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>However, further highway modelling is required to identify the level of benefit that this road would bring, the type/width of road and its precise alignment. All of these factors could have significant effects on the viability of the SDA. The work will be taken forward as part of the detailed design of the SDA and covered in a comprehensive Transport Assessment. As such the Local Plan must retain a flexible approach to the provision and delivery of the road. In addition, the road is indicatively shown passing over land outside of the SDA boundary. The Council should consider funding from other developments in the Chipping Norton Sub area that would directly benefit from it. The Council must also be willing to use compulsory purchase powers to ensure delivery of the road as a last resort in the public interest.</td>
</tr>
<tr>
<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>1746</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>CALA supports the provision of an eastern link road at Chipping Norton, recognizing the benefits that this could bring to improve air quality in the Town Centre. Policy T2 seeks to “safeguard” schemes but it is not clear what land is being safeguarded, i.e. there are no plans. The routes for the road shown on figure 9.14 in the Plan shows an ‘indicative’ alignment. It is recommended that the word “safeguarded” be deleted from the policy. If retained, any safeguarding should be drawn sufficiently wide so as to not frustrate the detailed layout of the SDA and the outcome of highway modelling and viability work. As currently drafted safeguarding of the land is not justified or effective.</td>
</tr>
<tr>
<td>MM776</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>2226</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>The percentage of HGV traffic quoted refer to a test scenario which now differs from the Local Plan allocation and need to be re-assessed to reflect this change. Therefore the impact on air quality may also differ.</td>
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</table>
| MM128        | A K Tredre-Short | Mr & Mrs Tredre-Short | 302         | > SECTION 7 - TRANSPORT AND MOVEMENT | With regard to the proposal for an eastern link road:  
• This is seen as a means of making the new number of 1400 Tank Farm properties as sustainable. It does not.  
• As a mitigation of air quality issues in the town, there is a possibility that some HGV traffic would use it, but |
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<tr>
<td>MM157</td>
<td>Declan Haverty</td>
<td>Mr Haverty</td>
<td>340</td>
<td></td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>MAIN 62, para 7.43:</td>
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<td>* In addition to re-routing HGVs from Chipping Norton town centre – in particular Horsefair – for reasons of a) official route guidance is for HGV traffic to use other routes and b) to improve air quality as required / for the health benefits of all in Chipping Norton I suggest strong consideration is given also for the very good reason of pedestrian (and traffic) safety</td>
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<td>* It would be terrible were an accident / injury / fatality to be caused by large lorries squeezing through a section of road too narrow for two vehicles to pass, when often they drive so close to the pavement that their cab mirrors impinge on the pavement</td>
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<tr>
<td>MM315</td>
<td>Richard Gwinn</td>
<td>- Gwinn</td>
<td>572</td>
<td></td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>The proposed link road in Chipping Norton appears to be a “road to nowhere” as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this relief road. This increase in traffic will also affect air quality, which is already at illegal levels.</td>
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<tr>
<td>MM374</td>
<td>Carillion Capita</td>
<td>Mr Flawn</td>
<td>725</td>
<td></td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>7.43b</td>
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<td>OCC Property &amp; Facilities supports the principle of an enlarged allocation at Chipping Norton SDA including the provision of an eastern link road. However, further work is required to understand the final alignment, size and cost of the road. Without this additional work it is not possible to determine whether the provision of a strategic road link in its entirety may affect the viability of the SDA scheme. The planning authority should give consideration to whether it will seek funding from other developments in Chipping Norton which would benefit from the road being provided – whether that through CIL or planning obligations. Furthermore, should there be an issue with bringing the necessary land forward to deliver the link road, the planning authority must be willing to use compulsory purchase powers to secure such land where alternative options are not available and it is in the public interest to do so. Without these clarifications, the plan could be argued not to be justified and effective.</td>
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td>778</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>MAIN 62 Para 7.43-7.43b Chipping Norton Eastern Link Road and town centre bus terminal facilities</td>
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<td>Stagecoach notes the comments in the proposed modifications arising from traffic modelling of the potential for this scheme to bring a wide range of benefits to the town.</td>
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<td>Stagecoach welcomes the recognition that this scheme demonstrably performs an important mitigation impact and also agrees that it is essential that the link is delivered to allow development of any significant</td>
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 quantum east of the town to be sustainably delivered. We would be clear that the Link Road represents an essential component in any access and movement strategy that would allow existing or future bus services to effectively penetrate the proposed residential allocation. Stagecoach therefore strongly supports the identification of the Eastern Link Road in the Plan as being an essential element of infrastructure in support of the Plan strategy.

However, the effectiveness of the Link Road as a future bus route is greatly compromised by the failure to consider how buses using the link are going to terminate in the town. Currently, most journeys on services 488 (form Banbury) and S3 (from Oxford) approach the town from the north/north east, and run through the town to terminate in the south of the town.

The probable diversion of the S3 in particular, to serve development proposed east of the town, also requires provision to be made in the Plan for buses to turn around in the Town Centre, and lay over, as an integral part of the access and movement strategy supporting the Plans proposals for the town. This is because buses from Oxford in particular, in all probability, need to approach the town centre from the south, having already served the main residential areas via the new Link Road and Burford Road.

In addition, bus stops and passenger waiting facilities in the town centre are poorly located, and entirely inadequate in scale to properly meet even current demand, much less that growth arising from the Plan’s modified development strategy. Suitable purpose designed facilities at the heart of the central area could make a very positive contribution to townscape and the public realm, which today is overly dominated by car parking.

NPPF paragraph 35 requires that the opportunities for sustainable transport such as this, should be indentified and protected.

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<tr>
<th>MM382</th>
<th>Chipping Norton Town Council</th>
<th>Chipping Norton Town Council Mrs V Oliveri</th>
<th>Mrs Oliveri</th>
<th>813</th>
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<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 62</td>
<td>General comments. Chipping Norton is one of the highest towns in West Oxon and is built mainly on hills with narrow streets except for the main roads of M4 and A36f in places the underground infrastructure (overflowing sewers/rainwater drainage - shared system) is already creaking with too much use and the road problems we have are well documented and accepted as being unfit for purpose by OCCA/VODC with a serious air quality problem in the centre of town. It might also be worth mentioning here that when an OCC employee was recently asked ‘how many of West Oxon’s main A roads are fit for the very large HGV’s we see nowadays?’ The answer was ‘none of them!’ CHIPPING NORTON NEIGHBOURHOOD PLAN – on 3rd March 2016 a referendum was held in the town accepting the CNNP which was then adopted. In this plan it was mentioned in several places that any future development has to be sustainable and it is felt that whilst 600 homes on Tank Farm were possibly sustainable 1400 homes are not - please see notes 213141516 below. It is felt that WODC in their draft Local Plan entirely ignoring the spirit of the CNNP. In February 2014 the Town accepted that it would have to take some new houses and reluctantly agreed that 600 on the area known as Tank Farm (the south half of the SDA) could be acceptable subject to suitable planning and mix of houses and infrastructure. Little contact has been made since then except for a plan that was attached to a planning application in the nearby area in the middle of 2015. Nothing officially has been given since the</td>
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meeting on 14th February 2014 until 23rd August 2016 when in a meeting between CNTC and OCC a plan using 800 homes plus 80 extra care beds was tabled and alterations suggested including no access at the southerly perimeter.

The next contact was the recent suggestion of 1400 houses. Considering that the allotment land to the south of the SDA is owned by the Town it seems strange that discussion about the possible of purchase of any land requirement has not yet happened - for sake of absolute clarity the William Fowler Allotment land is not for sale.

We also get the impression that some pressure might have been brought to bear on local land owners to go along with OCC plans - and please bear in mind that the majority of the land we are discussing is owned by OCC - thank goodness there are some ‘ransom sites’ to protect the town from being totally overrun and spoilt.

We also feel that discussions with other stakeholders have not taken place - we back this statement up with the recent planning application at the Pillars which is adjacent to the northern edge of the SDA with no vehicular access which apparently shows no coherent masterplan.

Chipping Norton Town Council totally reject the new local plan for the SDA for the following reasons in brief:

1) 1400 new homes on Tank Farm are not sustainable

2) The local employment of residents has fallen over the last 10 years and is now below 30%

3) The majority of local employment tends to be ‘low paid’ jobs in retail catering and caring sectors

4) ‘High paid’ jobs i.e. professional or technical jobs tend to be in what is now called the ‘knowledge spine’ which is difficult to access from Chipping Norton unless you drive as we have a poor train and bus service

5) Narrow and congested roads (including the main A441A361 at Horsefair where the worst pollution in Oxfordshire has been ignored for many years by OCC and WODC. The best long term solution to Horsefair are the road improvements needed around the Rollright Stones, which have been discarded due to cost - now budgeted at €18 million by OCC’s consultants

6) The cost of the Eastern Relief road has not yet been tabled but has to be close to the figures in (5)

7) The traffic figures being used from the survey carried out by WYG are erroneous - two points immediately stand out - a) it is stated that there have been no traffic related accidents in Horsefair in the last 5 years - we know that there have been 3 DEATHS in the period and b) it is stated that the busiest time of the day on Burford Road (A361) at Chipping Norton School (a large comprehensive 1200 pupils) is between 0700 and 0800, but in reality this is really 0815 to 0845.

8) We dispute the figures given to us by OCC and others which show that only 30% of the HGV’s that transit through Horsefair use the 4361 towards Burford and a massive TOO/o use the A44 east and west towards Oxford/Moreton-in-Marsh / Evesham and the 4361 north to Banbury.

We have been advised by independent traffic consultants that the figures are probably nearer to 15%
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<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1063</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>respectively 85%. We therefore consider the Eastern Relief Road to be ill-advised.</td>
</tr>
<tr>
<td>MM450</td>
<td>Railfuture</td>
<td>Andrew McCallum</td>
<td>Mr</td>
<td>McCallum</td>
<td>1070</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>Insert new 7.43h:</td>
</tr>
<tr>
<td>MM55</td>
<td>Catherine</td>
<td>Mrs Baker</td>
<td>Baker</td>
<td></td>
<td>126</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>I’d like to add my voice to concerns about the lack of soundness regarding plans for new road- and bridge-building, given that alternatives haven’t been considered and it’s not clear that the ensuing benefits would cancel out the likely harm of the developments.</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>Pearce</td>
<td></td>
<td>161</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>Building a new western link road to connect the A40 to the B4449 south of Eynsham, presumably close to the Chil Brook, will add to the flood risk in that area. Furthermore, it is odd to suggest that it will reduce the amount of “through-traffic” in Eynsham, when the bypass to the east already does this job well. The new western link will also fully finally enclose Eynsham in main roads - not conducive to countryside access for the residents.</td>
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<td>A new connection from the Garden Village to the A40, connecting with a new western bypass, will add another busy junction to the A40 and slow down traffic even further.</td>
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<td>Paragraph 7.43f: In addition to creating a new blockage on the A40, this “new main road” appears to run right through the middle of the Garden village, past a primary school and neighbourhood centre, becoming the High Street for a while, with five junctions - 1 from the Science Park, 1 from the Park &amp; Ride (both also residential) and three residential - and bus stops, before joining the dangerous Lower Road, which will have to be substantially improved in order to cope with the extra traffic. It will then serve as a back way (rat run) to...</td>
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<tr>
<td>MM61</td>
<td>NP Mr Pearce 162</td>
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<td></td>
<td>162</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>Paragraph 7.43g: Swinford Toll Bridge is indeed a congestion challenge. But electronic rather than human toll collection will have minimal effect, if any. The real problem is large vehicles which force traffic to stop and let them pass. Presumably you cannot widen the bridge, so maybe the only improvement is one of weight and size restriction (buses excepted).</td>
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<td>MM764</td>
<td>Oxford University and Colleges</td>
<td>Oxford University and Colleges</td>
<td>-</td>
<td>Oxford University and Colleges</td>
<td>1999</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>Main Modification 63, Paragraphs 7.43c, d, e, f, g The University &amp; Colleges note that the County currently propose to dual 3.5km of the A40 between Eynsham and Witney at a cost of £54m, which will be subject to ongoing discussion and analysis. Ensuring the delivery of sufficient transport capacity in this key transport corridor to accommodate future levels of commuting and other journeys to Oxford is essential if the Local Plan strategy is to be effective in contributing to meeting the housing needs of the City. The importance of the route is specifically identified in paragraph 7.23: ‘The A40 is the main east-west transport route with congestion on the section between Witney and Oxford being amongst the most severe transport problems in Oxfordshire and acting as a potential constraint to economic and housing growth.’ At present the County Council is undertaking consultation on the ‘A40 Eynsham Park and Ride and Bus Lane Scheme’. Paragraph 7.27a, b and c need to be updated to reflect this latest consultation and the overall status of the proposed improvements. Furthermore, as stated in reference to MM 15 &amp; 16 above, the current high levels of congestion on the A40 need to be addressed if the proposed Garden Village at Eynsham is going to be able to operate as an extension of the Oxford housing market and therefore contribute towards meeting the needs of the City. However, dualling alone is unlikely to solve the problem of accessing Oxford on the A40 corridor and would be likely to generate induced demand and simply attract more vehicle trips to the network, such that the new highways capacity rapidly fills and congestion returns. The University &amp; Colleges consider a more balanced solution is required including a range of sustainable modes as well as improvements to highway capacity. The University &amp; Colleges therefore request that there is a clearer commitment to the delivery of improved sustainable transport infrastructure for the A40 corridor. It is noted that the latest reports for the meeting of the OGB dated 30th November 2016 state that the A40 Eynsham Park &amp; Ride and Bus Lane Scheme will be delivered in the period 2018-2020. It is proposed that this wording is carried forward into the Local Plan.</td>
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<td>MM780</td>
<td>North A40 Land Consortium</td>
<td>-</td>
<td>-</td>
<td></td>
<td>2132</td>
<td>&gt; SECTION 7 - TRANSPORT AND</td>
<td>It is noted that proposed and anticipated improvements to existing highways capacity to the A40 connecting Witney and Oxford are subject to ongoing discussion and analysis. The Consortium welcomes further progress updates regarding the proposed schedule of improvements to the A40 in due course. It is further requested</td>
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<td>MM75</td>
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<td>AJ04</td>
<td>Mr</td>
<td>Bickley</td>
<td>214</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>that the potential implications of any proposed network improvements to development north of the A40 near Eynsham are made suitably clear. At paragraph 7.43e, it is noted that the garden village proposal is at a very early stage and that potential strategic or infrastructure improvements have not yet been determined. It is requested that engagement between the Consortium, the Local Planning Authority, and other relevant stakeholders inform any such highways improvements or enhancements.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2191</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>7.43c to 7.43g are not showing any clear joined up thinking between WODC, OCC and the Highways Agency about the current transport issues around the A40 and Eynsham, or the impact that adding the proposed Garden Village will have. The proposed garden village, rather than providing solutions, will actually add to the existing problems - e.g. in 7.43d, the new P&amp;R is already proposed as part of a separate A40 consultation for existing traffic and totally independent of the garden village proposal. It is not the garden village proposal that is providing the P&amp;R as the sentence states. The reliance on a non-existent AAP does not help the reader understand what the actual proposals are or could be.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2235</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>Changes to the Distribution of Housing to allocate land at West Eynsham and a new Garden Village north of A40 at Eynsham to help meet Oxford's unmet needs: MM 63 et al. We support the various MMs which propose to identify Eynsham as a location for significant development to meet the district’s share of Oxford’s unmet need within a 1,000 home urban extension to the west of Eynsham and a new Garden Village north of the A40 for 2,200 homes. Soundness reason: Positively prepared, effective and justified Spatial options based on Land to the west of Eynsham and land north of the A40 were both subject to high level testing through the post SHMA process to establish their ‘sustainability’ in meeting the housing needs of Oxford. Both options were RAG rated green and formed the basis for the district’s apportionment for unmet need. Both sites are outside the Green belt and can take advantage of planned investment in strategic infrastructure improvements on the A40 corridor, including the committed and funded project to provide a new park and ride facility in Eynsham as well as an eastbound bus lane between Eynsham park and ride and the Duke’s Cut canal bridge near Wolvercote and the future development of this corridor as a Rapid Transit public transport route. There are references to the Garden Village being ‘self-contained’. When planning strategic infrastructure such as secondary school provision to support growth in the Eynsham area it will be important to take a comprehensive approach to assessing the impacts of growth and planning necessary capacity improvements. The West of Eynsham SDA will need to be served by a spine road to distribute trips arising from the development onto the surrounding road network. The West of Eynsham SDA will need to be served by a spine road (not a bypass) to distribute trips arising from the development onto the surrounding road network. The garden village will need to be served by a spine road to distribute trips arising from the development onto the surrounding road network.</td>
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<td>MM20</td>
<td>Sandy</td>
<td>Mrs</td>
<td>Hellig</td>
<td>24</td>
<td>&gt; SECTION 7 - TRANSPORT</td>
<td>See below</td>
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| MM3           | richard andrews         | Mr Andrews      | 52               |                   |            | > SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 63 | **Comments are made on behalf of Eynsham Parish Council.**

7.43c Comment: lacks soundness – no consideration of alternatives, not objectively assessed

7.43c prejudges the building of a Link Road between A40 and B4449 as being of unqualified benefit. It should be considered only as a possibility, as the Eynsham Neighbourhood Plan (ENP) has identified significant harms that would result. The ENP also questions if the benefits of slightly shortening the existing route along the eastern and southern bypasses of Eynsham will ever justify either the expense of or traffic nuisance caused by the road to residents on the new development.

We do approve of the idea being considered as part of the AAP, which we consider should apply to a single Eynsham Strategic Development Area to make issues such as road traffic which affect both WOGV and West Eynsham. We note that this section on transport does appear to see the AAP as applying to both areas.

7.43f Comment: lacks soundness – no consideration of alternatives; a main road through a community or extra cost of a Link Road is likely to delay the project.

7.43f appears to justify the addition of a 'Northern Link Road' associated with the development of WOGV although the wording of the paragraph is somewhat confused.

There does need to be a 'through route' that will allow buses to serve WOGV and Hanborough Station from the Park and Ride and as a bus route would be best going through the housing and/or village centre to serve the maximum number of potential passengers. This would simply be local village roads leading from one side of the settlement to another.

A Northern Link Road implies it is for for general traffic. Running this through the new community will be as unwelcome as through any other community. But there is no possible reason for through traffic to go between Cuckoo Lane and Lower Road so the idea of a separate Link Road in completely unnecessary and will only detract from focussing on building much more necessary infrastructure or even delay the project.

One opportunity to improve the road network is presented by the inclusion of site 150 both sides of Lower Road - the dog-leg here is always considered hazardous by locals and could easily be straightened as part of better access to the east side of WOGV.

We strongly recommend the 'iconic bridge' idea be dropped as impractical and unnecessary. It would not be possible to build as shown, as it would cross the front of houses in Spareacre Lane; the draft Eynsham Neighbourhood Plan (ENP) (Section 16.20ff) addresses the issue of safe crossing for the A40 and explains why a bridge in this location will be of very limited value. In any case OCC plans for the A40 call for a number of pedestrian/horse crossings nearby so it is no longer needed.

The opportunity to mention real possible improvements to the A40 is missed although there are generalised laments about the state of the road elsewhere The ENP strongly recommends that a route be protected between the existing A40 and the southern edge of the WOGV for the A40 to be upgraded, removing the multiple junctions and crossing points that are noted elsewhere as contributing to the slowing of through traffic. |
Policy T2 'proposes to deliver' a Western Link Road, Eynsham and 'Northern Link Road, WOGV', neither of which is yet justified.

A map outlining Eynsham Parish Council's suggestion for a protected route for A40 improvement is attached.

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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td></td>
<td></td>
<td>560</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
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Building a new western link road to connect the A40 to the B4449 south of Eynsham, presumably close to the Chil Brook, will add to the flood risk in that area. Furthermore, it is odd to suggest that it will reduce the amount of 'through-traffic’ in Eynsham, when the bypass to the east already does this job well. The new western link will also fully and finally enclose Eynsham in main roads – not conducive to countryside access for the residents. Para 7.43e

Not sound

A new connection from the Garden Village to the A40, connecting with a new western bypass, will add another busy junction to the A40 and slow down traffic even further. Para 7.43f

In addition to creating a new blockage on the A40, this ‘new main road’ appears to run right through the middle of the Garden Village, past a primary school and neighbourhood centre, becoming the High Street for a while, with five junctions – 1 from the Science Park, 1 from the Park & Ride (both also residential) and three residential – and bus stops, before joining the dangerous Lower Road, which will have to be substantially improved in order to cope with the extra traffic. It will then serve as a back way (rat run) to the A44, A34 and M40: what will the Bladon residents think of that? Furthermore, no mention is made of this new main road displacing David Einig Contracting, a thriving aggregate recycling business in the middle of the Garden Village site.

In the distant past, villages were built around roads for a good reason, but traffic was minimal and alternative communication unavailable. Who today would willingly set out to create a new village around a busy main link road? The new residents will be crying out for a bypass as soon as they move in. Also, who pays for all these new roads? As for the ‘iconic feature bridge’, using it to allow 'easy connection' between Eynsham and the Garden Village flies in the face of Garden Village principles, which insist that such developments should not be an extension of an existing town or village'. And as for access between the two areas and into open countryside beyond, WODC's Expression of Interest (and Para 9.5.32) makes it clear that further expansion of the Garden Village is envisaged. As this is mostly likely to happen to the north, there will be no countryside left to access between the A40 and Long Hanborough. Just a sprawling suburb. Para 7.43g

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<td>Richard Higgins</td>
<td>Mr Higgins</td>
<td>575</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 63</td>
<td>Swinford Toll Bridge is indeed a congestion challenge. But electronic rather than human toll collection will have a minimal effect, if any. The real problem is large vehicles which force traffic to stop and let them pass. Presumably you cannot widen the bridge, so maybe the only improvement is one of weight and size restriction (buses excepted). MAIN 65, Para 7.54 Not sound While new bus services will be welcome (whether they turn out to be fast is debatable), new residents might not be too pleased to have a Park &amp; Ride as ‘an integral part’ of their village, attracting large numbers of strangers to the neighbourhood. Para 7.55 I am not sure how new bus services at the Park &amp; Ride will help those people in smaller rural areas whose bus services have been lost. How are they going to get to the Park &amp; Ride, if indeed they want to get there? (A bus route that went from the Park &amp; Ride to Long Hanborough station via Freeland might help: ask the residents there.)</td>
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<td>Tony Bovey</td>
<td>Mr Bovey</td>
<td>611</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT</td>
<td>Item 7.43d. The Park and Ride is entirely separate to the Garden Village and cannot be linked. Eynsham is the wrong place for the Park and Ride. It should be nearer Witney/Carterton. The OCC decision to locate it at Eynsham was a fiddle, the alternative sites were specifically chosen because they were inferior. No site to the west of Eynsham was included, so the benefits or problems were not reviewed. Courses in Problem-Solving teach you that you never, ever, ever dismiss an idea before thinking it through to figure out whether it’s possible. WODC should be opposing the Park and Ride at Eynsham. The shortfall in Oxford houses is not all about new houses for the current community and new jobs. A lot of the houses will be required for people moving into the district and working in London so we will get lots of large houses when what is required is lots of starter/cheaper houses. Development must not worsen the living conditions for the existing population. Infrastructure and amenities for new developments must be completed before people live in the new developments. The development of the western side of Eynsham must be developed as a whole, not just a collection of unrelated developments. They must be a positive part of the village unlike the Garden Centre development which is out on a limb, separate to the village. I also agree with the comments made by the Eynsham Neighbourhood Plan team.</td>
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<td>Northmoor Parish Council</td>
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<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1476</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 64</td>
<td>the problem for the present usage and certainly not for the projected increase that would arise from this Local Plan. The A415 has problems of its own that are centred on Newbridge, a historic bridge inadequately protected by an 18 tonne limit, that could have further restrictions should traffic levels rise. The toll bridge at Eynsham is an historical artefact that has no place in the Plan for tomorrow.</td>
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1512</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 64</td>
<td>CPRE feels that the focus in Carterton should be to strengthen the core of the town. Therefore, CPRE is supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across the 2 sites. Therefore, CPRE supports clauses 9.3.3-9.3.6, 9.3.36 &amp; 9.3.50. However, the REEMA areas cover 146 acres in total. The last information from the MOD indicated that 742 SFA homes are needed, which at the usual JSP density of 12 per acre, will require 62 acres, leaving 84 acres spare. North and Central areas cover approximately 70 acres (22 at REEMA North and 48 at REEMA Central), so the allocation of 300 houses in addition to the existing 200 is modest, even accounting for some retail or leisure land. CPRE also feels that there is likely to be potential in other REEMA areas in the town and it now appears that past claims of increasing housing need generated by RAF Brize Norton were unfounded. The existing houses are at an approximate density of 6 homes per acre, as they are not well-planned. Therefore, no further expansion of the town should occur until these sites achieve their potential and any future development in Carterton should be focused at REEMA. It is clearly preferable to development on open countryside and CPRE agrees with WODC that it will improve the style and image of the town. It is development that would lead to clear betterment and would be likely to be well supported in the community. In line with the need, mostly apartments and small homes should be built, with a few larger gateway properties for kerb appeal. Some housing for the elderly would be beneficial. That means that the density could be relatively high, in line with most town centre developments. It would not be unreasonable to expect a density of 20-30 per acre or 50-75 per ha to be achieved in line with other mixed developments in the area, giving a total potential of at least 1,680 homes in REEMA North and Central areas alone, based on 50 units per ha.</td>
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In fact, Carterton has the least infrastructure and facilities of the three main towns and lags behind in terms of employment opportunities, as noted in the Draft Local Plan clauses 2.26, 9.3.10, 9.3.39 & 9.3.42. There is a pre-existing imbalance between numbers of jobs and homes/workers, meaning that out-commuting is high. It’s the furthest from Oxford and has no A road access. There is mention in 9.3.15 and 9.3.67 of upgrading the B4477 in Brize Norton to an A road at a cost of £3.9M, but clauses 7.48 & policy T2 are vague about funding. It appears that there is no firm commitment or allocated funding. It is not clear either where the £7.2M for westbound slips onto the A40 will come from at Minster Lovell.

Carterton should not therefore be seen as the obvious place to put any houses that other areas do not want, as has been suggested by some.

If a significant number of houses were moved from Witney to Carterton, Carterton would counter significantly more growth per capita than Witney. Carterton could not sustain such growth without further major incursion into open countryside in neighbouring parishes (over and above that already caused by Shilton Park, Carterton North and Carterton East in Brize Norton and Shilton Parishes), which CPRE considers unacceptable.

### MM733

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<td>MM733</td>
<td>Angie Titchen Dr Titchen 1704</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 64</td>
<td>Section 7, Transport Policy T2 should require a proper cost-benefit analysis of building Link Roads and/or improving existing roads. Given limited funds apart from developer contribution, all funds should be focused on the most beneficial results as part of AAP development. Link Roads need to be defined – 40+mph HGV routes or 20mph local roads within built-up area. The alternative of ‘safeguarding’ an improved route for the A40 between Eynsham and Tilgarsley should be included as this could deliver more benefit than local link roads and show due cooperation with OCC to benefit the wider district.</td>
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### MM738

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<td>Cala Homes Chiltern</td>
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<td>CALA recognises the need for a road around the east of the Town and the benefits that this could bring. However, further highway modelling is required to identify if this road is required as currently set out in the Main Modifications, the type of road and its precise alignment. As such CALA requests, as per paragraph 9.4.4a of the Local Plan that the route for the link road remains indicative at this stage to provide flexibility in the detailed design stage. Commentary should be amended to include that the route of the link road should be subject to the masterplanning of the whole site to ascertain the best location and that the viability of the road needs to be assessed. CALA also seeks changes to ensure that other developments in the Chipping Norton sub-area contribute financially to the road if they would benefit from it. The Plan needs to acknowledge that the Council would, as a last resort, consider use of compulsory purchase powers to enable delivery of the road.</td>
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### MM751

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<td>MAIN 64 POLICY T2 states that a new ‘Western Link Road, Eynsham’ will be safeguarded. We support this change to enable the development of this area to come forward.</td>
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<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
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<td>Gareth Hammond</td>
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<td>Carillion Capita</td>
<td>Jeremy Flawn</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
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<td>David Miles</td>
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<td>Ascott Parish Council</td>
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We are extremely concerned that an inspector, if considering a planning application appeal, might refer to the WODC Local Plan 2031 and think that Ascott-under-Wychwood has amenities equal to Shipton and Milton and we would ask that the Draft Local Plan be amended to reflect the true picture.

Stagecoach supports the modification which is essential to the soundness of the Plan's proposed revised development strategy.

The short term delivery of this facility represents an integral part of A40 Science Transit Phase 1, and proposed subsequent improvements on the corridor's capacity west of Eynsham. The bus lanes provided as part of the scheme will unlock the ability for Stagecoach to provide effective sustainable transport links from the District to Oxford City, including important destinations within the Eastern Arc, to which it is not possible today to offer direct regular and reliable bus services, owing to chronic prevailing traffic congestion.

The delivery of these measures provides scope to raise the mode share for bus between Carterton, Witney and Eynsham to the Eastern Arc from less than 3% to a much higher figure; perhaps as high as 30%, in the reasonably short term, after the project is delivered.

The effectiveness of this scheme will be further reinforced by additional measures including additional bus priority at Oxford Northern Gateway on the A40; rapid transit within the City on the Banbury Road and Woodstock Road corridors; and the County's Access to Headington project, which is already underway.

This suite of projects sits within a clear overarching strategy within the County's LTP4 "Connecting Oxfordshire".

I am not sure how new bus services at the Park & Ride will help those people in smaller rural areas whose bus services have been lost. How are they going to get to the Park & Ride, if indeed they want to get there? (A bus route that went from the Park & Ride to Long Hanborough station via Freeland might help: ask the residents there.)
development along with any necessary deviations around developments that have occurred since the railway was closed.

Therefore add at the end of 7.58 the following:

However, there is potential to re-open the old line to Witney from Yarnton Junction and the track of the railway will be safeguarded from development along with any short deviations to by-pass the small number of developments made since the railway was closed.

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When the Local Plan was originally developed, it made sense to concentrate housing developments in the three market towns. However, it is not appropriate to merely extrapolate the original allocations to take the additional numbers required by the Inspector and the SHMA. In particular, it is not sustainable to allocate an additional 800 homes to the Chipping Norton SDA. The percentage of residents employed locally has been falling steadily over the last decade and is now below 30%. Employment growth in the County is centred on the ‘knowledge spine’ running from Bicester through Oxford to the South. Chipping Norton is too inaccessible to attract significant potential employers, who will want to locate near the clusters along the spine. The main employment locally is for ‘minimum wage’ jobs in retail and caring sectors. New residents looking for professional or technical jobs will be forced to commute by car using the sub-standard A44 towards Oxford or the more dangerous A361 towards Banbury. The bus service to Oxford only runs hourly and has to cope with the severe congestion in the Wolvercote roundabout area. Access to the North Cotswold railway line at Kingham is also difficult - the connecting bus service is now sparse and unreliable following the County Council cuts, not as implied in para. 7.58.

The additional 800 homes must be allocated nearer to Oxford with easy access to a railway line, thereby linking easily to the main employment areas in the County. The modified Plan already picks up on this logic, by proposing the Eynsham garden village with good links to Hanborough station (and with the potential to be eventually linked to a re-opened railway line to Witney) and with employment areas nearer to the ‘knowledge spine’ clusters. The Chipping Norton “800” should therefore be reallocated to the Eynsham area or sites even nearer to Oxford, with a start date earlier than the 2021 proposed for the garden village.

The Chipping Norton Eastern Link Road proposed as part of the Tank Farm SDA will not achieve the reduction in HGVs through the town centre - the vast majority of HGVs are on the A44 towards Evesham, not on the A361. The link road will be a “road from nowhere to nowhere”. The money on the link would be wasted and reduce the likelihood of achieving a proper Chipping Norton by-pass on the A44.

The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.

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We support the reference at paragraph 7.57 to car parking provision at the identified stations being an important consideration. As the Council is aware, at Hanborough Station a lack of sufficient levels of car parking provision has caused many issues in recent years, both in terms of suppressing existing rail demand and resulting in unauthorised and unacceptable car parking on highways verges etc…..This is a matter that requires major improvements to address existing issues, and is not dependent upon the levels of additional housing now proposed in the Local Plan.

Paragraph 7.57a

We support the reference at paragraph 7.57a to the ‘exceptional growth’ in passenger numbers at Hanborough Station in particular (a 239% increase). Whilst growth is also noted at Charlbury (30%) it...
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<td>Mr Miles</td>
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<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MAIN 66</td>
<td>is evident that the growth at Hanborough Station is of a wholly different and fundamentally more substantial order. This growth of course reflects the proximity of Hanborough Station to Oxford, and the increases in car parking provision provided at the station in recent years (which have released some clearly suppressed demand and allowed some people to shift from the private car to the train). The noted extent of suppressed demand, together with the introduction of an hourly service in 2018 and new trains with increased capacity and faster journey times, serves only to highlight that further improvements are required at Hanborough Station (including materially increased levels of car parking) and that this further demand / required improvements are necessary to address an existing situation and are not simply a consequence of the additional development proposed in this Local Plan. Paragraph 7.57b Having regard to our support for paragraphs 7.57 and 7.57a, we also support the specific provisions of paragraph 7.57b which identifies the Council's aspiration to develop Hanborough Station as a transport hub to help reduce congestion on the A40. We also support the specific identification that to fulfil its potential, Hanborough Station will require a larger car park, footbridge and new platform so that any trains extended from Oxford can terminate and turnaround. As the Council is aware a planning application for residential development adjacent to Hanborough station (Ref: 15/03797/OUT) has just been the subject of a Public Inquiry and would, linked to the proposed development, make land available at nil cost which GWR has confirmed is of an appropriate size, and an appropriate location, to deliver the short and longer term station improvements identified by GWR – improvements needed to address existing issues and not only a response to the additional growth proposed in the Local Plan.</td>
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<td>The presumption has to be in favour of sustainable development and this means having the necessary infrastructure in place to cope with an increased population. The modifications to the local plan clearly show where development is intended to take place but they also need to show how this can be facilitated. Proposed modification- Downgrading of Long Hanborough: The proposed modifications involve the downgrading of Long Hanborough from a service centre, to a lower order village. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN13, MAIN14, MAIN15, MAIN59, MAIN66, MAIN145, MAIN149. Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. We object to proposed modifications which suggests the downgrading of Long Hanborough from a rural service centre to a village. The submission plan confirmed the rural service centres were classified as such because they benefitted from a range of services and facilities which supported the village and surrounding area. They are able to support additional homes in the short-term, while proposed growth can enhance the role of the settlement in supporting the surrounding rural area (paragraph 4.18). This approach was directly in line with the plan’s objective 1 'strong market towns and villages’ and objective 4 ‘sustainable communities with access to services and facilities’, both of which remain un-modified.</td>
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Long Hanborough retains the same services and facilities which existed at the time the plan was submitted, furthermore planning permission has been granted which allows significant expansion of the primary school (15/03341/FUL). While additional housing has been permitted no evidence has been produced to suggest additional homes would result in any harm to the character or sustainability of the settlement. The village therefore remains well placed to fulfil the role of a rural service centre.

The downgrading of Long Hanborough proposed through modifications is largely unexplained and not supported by any evidence. The Council cite the creation of a ‘new’ service centre through the northern expansion of Eynsham as justifying the downgrading of Long Hanborough as the new development will need to “develop a critical mass of services and facilities” (paragraph 2.5a).

We are concerned the Council’s explanation suggests an intention to restrict the development of Long Hanborough and reduce services in the village in order to encourage their replacement in the new development. A restrictive approach to development stifling an existing sustainable settlement and vibrant community is clearly at odds with the Plan’s vision, policies of the NPPF and good planning practice.

The provision of an additional service centre would be entirely in line with the Plan objectives. If the development proposed north of Eynsham is to proceed it is clearly preferable that Long Hanborough maintains its status as a service centre complementing any new facilities created. The need to retain the service centre is particularly pronounced due to the unclear deliverability of the proposed site north of Eynsham, even if the site is delivered this will not be until the latter part of the plan period, therefore there is a need for services and facilities in the interim.

The submitted plan set out clear objectives which the following policies sought to deliver sustainable communities. The Council seeks to deviate from this approach without explanation, evidence or proper assessment, we therefore believe this modification should be deleted.

Passenger growth on the Cotswold line has been significant with exceptional growth at Hanborough (up 239%) and at the busiest station on the line at Charlbury (up 30%).

Para 7.57c
There is no commercial case for a connecting bus service from Eynsham Garden Village to Hanborough. Good public transport routes will link the Garden Village with Oxford rail station.
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<td>&gt; MAIN 66</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT</td>
<td>Ascott-under-Wychwood Parish Council notes that our village has actually been named for the first time in the Draft Local Plan 2031 and has been moved to the 'Villages' category. We are very concerned that this has been done apparently arbitrarily and without any consultation at all with the Parish Council. The consequence is that certain statements which were acceptable last year (when only 2 Wychwood villages were named) are no longer accurate with Ascott-u-W included. Ascott is a village one half and one third of the size of the other two Wychwood villages and with far fewer amenities. It is not accurate to include Ascott in the general Wychwood statements written last year. This places us in the difficult position of strongly objecting to statements which are not among the amendments but our objections do flow from the original critical amendment – that of naming Ascott-under-Wychwood in the Villages category. In particular, we feel that the impression is given over and over again that Ascott-u-W is reasonably well served by public transport. This is blatantly not the case and the situation has got worse in the past 6 months with the cuts in bus subsidies (as indicated in our response to the WODC Planning Services Parish Survey 2016). Ascott-u-W also appears to have a Post Office (Friday afternoon in Tiddy Hall does not constitute a Post Office) – and a smart railway station with a reasonable service (when in fact it has 1 train each way on weekdays only, too late in the morning for London commuters and even Oxford schools). We are extremely concerned that an inspector, if considering a planning application appeal, might refer to the WODC Local Plan 2031 and think that Ascott-under-Wychwood has amenities equal to Shipton and Milton and we would ask that the Draft Local Plan be amended to reflect the true picture.</td>
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<td>MM373</td>
<td>Gloucestershire County Council</td>
<td>Robert Niblett</td>
<td>Mr Niblett</td>
<td>711</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT</td>
<td>Direct rail access is not currently provided between the Central Severn Vale and Oxford – a new direct rail connection linking the Central Severn Vale to Oxford via Honeybourne might be something to consider in the long-term to maintain connectivity between these centres. Substantial investment will be required at existing stations along the North Cotswold line to encourage and facilitate greater use of rail services arising from the new development as well as meeting the ongoing demand that continues to increase. Providing quality bus services connecting stations to new and existing development will be critical in reducing car usage in the area.</td>
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<td>MM375</td>
<td>Charlbury Town Council</td>
<td>Charlbury Town Council Mr S R Clarke</td>
<td>Mr Clarke</td>
<td>732</td>
<td>&gt; SECTION 7 - TRANSPORT AND MOVEMENT</td>
<td>Paragraph 7.57 to 7.59 – Public Transport We welcome the inclusion of this proposed modification. However, we regret that it is phrased such that the need for improved bus and cycle links is restricted to the Garden Village to Hanborough station (7.57c), rather than all the catchment areas for the district’s stations – especially in the light of recent cuts to bus subsidies and the increasing traffic on the area’s roads, with consequent effects on local residents. (Note in particular the withdrawal of the C1 bus to Charlbury station, and the local campaigns for improved cycle links to stations.) We object to the limitation of redoubling to “Wolvercot Junction and Hanborough and from west of Evesham towards Pershore”. Full redoubling between Charlbury and Wolvercot Junction is a long-standing aspiration of rail travellers and user groups, and will provide greater resilience and flexibility in the peak hours. Though we recognise that redoubling to Hanborough is the short-term priority, we believe the Local Plan should restate the ambition for full redoubling rather than asserting that partial redoubling will “fully realise the potential of the railway”.</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach</td>
<td>Nick Small, Dr Small</td>
<td>796</td>
<td>&gt; SECTION 7 - TRANSPORT</td>
<td>MAIN 66 Paragraphs 7.57-7.59 Rail Assets and Improvement Schemes</td>
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<td>MM357</td>
<td>West</td>
<td>Stagecoach Bus</td>
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<td>AND MOVEMENT &gt; MAIN 66</td>
<td>Stagecoach notes the recognition that rail improvements are anticipated in the future. It is important that any dependency on these on the part of the development strategy taken forward in the Local Plan, is clearly indicated and made explicit. This is important, given the risks that delivery timescales on the railway are prone to slippage, or on occasion, non-delivery.</td>
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| MM45          |                        | Tony Bovey     | Mr               | Bovey             | > SECTION 7 - TRANSPORT AND MOVEMENT > MAIN 66 | 7.5: westbound bus priority must extend beyond Duke's Cut.  
7.57b: Improvement of and access to Hanborough Station is as important as the A 40 corridor improvements.  
7.57c: essential for sustainable travel. Oxford overspill in the Eynsham SDA should be included in the Garden Village, which should be extended northward for better access to Hanborough Station. |
<p>| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs | &gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MIN 50 | Outside the main towns and rural service centres although there are a number of national cycle network routes running through the District, most pedestrian and cycle opportunities involve the use of ‘quiet roads’ rather than dedicated pedestrian and cycle links. Increased traffic levels on these quiet roads may prevent vulnerable road users from accessing these routes safely. |
| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs | &gt; SECTION 7 - TRANSPORT AND MOVEMENT &gt; MIN 51 | Suggest adding: New development will be expected to contribute towards the provision of new and/or enhanced public transport, walking and cycling infrastructure to help encourage modal shift and promote healthier lifestyles, including the use of the Public Rights of Way network. |</p>
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<tr>
<td>MM18</td>
<td>RW Howard, Canon Howard</td>
<td>MM574</td>
<td>Jeanette Hawkins</td>
<td>MM574</td>
<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MIN 55</td>
<td>MIN 55 The Dark Sky Discovery Site at Rollright Stones appears to be a block to developing an alternate route, and the disagreement between 3 county councils makes this further unlikely.</td>
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<td>Forestry Commission, South East and London Area Office</td>
<td>Local Plans and ancient woodland – Forestry Commission approach</td>
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<td>1336</td>
<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 67</td>
<td>The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.</td>
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<td>Standing Advice for Ancient Woodland and Veteran Trees [<a href="http://www.naturalengland.org.uk/Images/ancient-">http://www.naturalengland.org.uk/Images/ancient-</a></td>
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<td></td>
<td>woodland-standing-advice_tcm6-37627.pdf</td>
<td>(Published April 2014)</td>
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The Forestry Commission has prepared joint standing advice [https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences] with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.

The Standing Advice website will provide you with links to Natural England's Ancient Woodland Inventory [http://www.gis.naturalengland.org.uk/pubs/gis/tech_aw.htm] , assessment guides and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. Case Decisions demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our website [http://www.forestry.gov.uk/forestry/infd-9hbjk4] .


Page 24 "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs)."


Page 10 "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland".


Paragraph 2.53 - This has a “renewed commitment to conserving and restoring ancient woodlands”.

Paragraph 2.56 – "The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites".


Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).

Renewable & low carbon energy

The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors
and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.

Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.

Flood risk

The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.

The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.

In the wider planning context the Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives [http://www.forestry.gov.uk/forestry/infd-9asbjw] as part of a wider integrated landscape approach. For instance through:

* the inclusion of green infrastructure [http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/] (including trees and woodland [http://www.forestry.gov.uk/forestry/BEEH-A6LMEZ]) in and around new development; and
* the use of locally sourced wood in construction and as a sustainable, carbon lean fuel [http://www.forestry.gov.uk/communitybiomass].

The addition of a reference to “priority species” is apt in the case of the Garden Village proposal. The well-respected Plantlife organisation (plangtlife.org.uk) has this to say about City Farm, much of which lies within the proposed Garden Village site, with the rest immediately adjacent to it:

"The fields at City Farm have been regularly surveyed between 2014 and 2016 by experienced botanists including the Oxfordshire Flora Group and BSBI [Botanical Society of Britain and Ireland] vice-county recorder providing specialist identification of difficult species, such as nettle-leaved goosefoot and blue pimpernel. City Farm has an IAPA score of 90 making it of European importance for arable plants." (IAPA = Important Arable Plant Area.)

Over a dozen plant species present on the farm are on the Red List for England. Many others are endangered, rare or vulnerable. The site is almost unique in Oxfordshire in that it has probably never been farmed using modern intensive methods, and now has both grassland and arable fields that are highly diverse on the same site.

Arable plants are the fastest declining group of plants in the UK. City Farm has become such an important site for their conservation partly because of its recent sensitive management, but perhaps more importantly because it has never been subjected to high and consistent herbicide use. This has enabled seeds of arable plants that were more common five decades or more ago to survive in the soil and return to flourish quite quickly once appropriate management was reinstated. For example, nettle-leaved goosefoot, a nationally vulnerable species, had not been recorded anywhere in Oxfordshire since 1985 until it was identified at City Farm in 2016. City Farm is close to unique in having experienced gentle farming management that has allowed plants such as this and many others to persist and now return to thriving abundance. As such it is a rare and precious resource, whose importance is only now being fully revealed and appreciated.

A separate ornithological report concludes that: "The combination of different habitats found within a relatively
small area at City Farm, including arable land, grassland, scrub, large hedges, small streams and a range of ponds and damp areas, means that a wide variety of resident and migratory birds have been recorded making use of City Farm. Currently, the list of birds recorded since 2010 stands at 90 species, a remarkably high total for a single farm. Fifteen of these species are on the "NERC Act Section 41" list cited in paragraph 8.12.

It should be noted that WODC, as part of its evidence base, has cited the “West Oxfordshire Landscape Assessment” (WOLA). However, this report is dated 1998, and much has happened to the landscape since then. Most notably, City Farm, which has probably never been farmed intensively, has for the past 6 years been farmed organically with wildlife as a high priority under a Higher Level Stewardship agreement. This has had a hugely beneficial impact on the habitats and wildlife in the area. The WOLA does, however, make it clear how important the landscape due to fall under the Garden Village is (see, for example, the "Conserve" and "Strengthen" sections of pages 15 and 16 of the WOLA).

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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>561</td>
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<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 67</td>
<td>MAIN 67, Para 8.12</td>
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Para 8.13
Not sound

WODC ‘expects’ British Standards BS 42020: 2013 [on biodiversity ‘conservation and enhancement’] to be applied as good practice, but ‘expecting’ is not the same as ‘ensuring’. Who will ensure that the developers fully observe BS 42020? What checks and procedures will be put in place? In relation to the comment on Para 8.12 above, it seems to me that, among other precautions, the kind of air quality monitoring and measures recommended by the Habitat Regulations Assessment for the Oxford Meadows SAC (Special Area of Conservation) should be applied to the area proposed for the Garden Village.

As just one example of the adverse effects of ‘urbanisation’ (which is what the Garden Village will create), a survey on ‘cat predation’ in 1997 indicated that ‘nine million British cats brought home 92 million prey items over a five-month period. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation.’ (URS Habitats Regulations Assessment for WODC, 2015 – effects of urbanisation, including roads, fly-tipping et al.) Not good news for the high-value wildlife population in and around City Farm. The proximity of many more domestic cats, and dogs, would threaten the breeding populations of ground-nesting birds such as Lapwing and Skylark in particular.
Local Plans and ancient woodland – Forestry Commission approach

The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.

A summary of Government policy on ancient woodland


Section 40 – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.


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Renewable & low carbon energy

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- the use of locally sourced wood in construction and as a sustainable, carbon lean fuel [http://www.forestry.gov.uk/communitybiomass].

Regarding the importance of habitat connectivity, it is evident that the Garden Village will substantially disrupt both habitat connectivity and biodiversity during the ten years of construction, and, despite claims to the contrary, will clearly affect it adversely afterwards, not least because of the addition of so many new roads. As noted in your paragraph 8.13, there should “not be any localised adverse effects resultant from construction or increased road trips within 200 metres of the European sites”. City Farm is now recognised as a site of European importance for arable plants, and part of it, immediately to the north of the Garden Village, is also a Local Wildlife Site. Furthermore, Millennium Wood (Eynsham Wood, owned by The Woodland Trust) looks as though it will be entirely cut off from connectivity.

The Habitats Regulations Assessment 2016 notes, regarding “the delivery of 15,590 new dwellings within and around the Main Service Centres, Rural Service Centres and Villages”, that the “quantum and distribution of new dwellings has clear implications for potential impacts on European sites”.

(Figure 8.4 is incomplete, because it does not show the City Farm Site of European Importance for Arable Plants, which could also be added in future to the Conservation Target Areas shown in Figure 8.3.)

The plans for improvements to Conservation Target Areas are pretty vague and seem no more than an aspiration rather than a guaranteed commitment.
For example, after many re-writes of this plan I am still no clearer as to what exactly you intend to do in the Shill Brook CTA to make ecological improvements, where the funding would come from, which land owners you would work with and which if any ngos ,such as the Wildlife Trusts you may work with on these plans.

Considering how much agricultural land is being used for housing and employment at Carterton, Witney, Chipping Norton, Eynsham and elsewhere, I believe you need a detailed strategic action plan on mitigating the loss of habitat for farmland specialist species. Farmland birds have suffered enormous declines and many species are already red-listed, this further loss...
and fragmentation of habitat within WODC boundaries needs to be looked at if you are to meet your biodiversity obligations.

Where are the plans for new woodlands or nature reserves or country parks to meet the needs of the 15,000 plus new households? The plans for green infrastructure need some larger strategic sites added, you can’t just rely on existing green sites and then add little parks etc into each development, you require a much bolder vision.

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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>562</td>
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<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 68</td>
<td>MAIN 68, Para 8.16</td>
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<td>Not sound</td>
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|               |                         |                |                 |         |                    | Regarding the importance of habitat connectivity, it is evident that the Garden Village will substantially disrupt both habitat connectivity and biodiversity during the ten years of construction, and, despite claims to the contrary, will clearly affect it adversely afterwards, not least because of the addition of so many new roads. As noted in your Para 8.13, there should ‘not be any localised adverse effects resultant from construction or increased road trips within 200 metres of the European sites’. City Farm is now recognised as a site of European importance for arable plants, and part of it, immediately to the north of the Garden Village, is also a Local Wildlife Site. Furthermore, Millennium Wood (Eynsham Wood, owned by The Woodland Trust) looks as though it will be entirely cut off from connectivity.

The Habitats Regulations Assessment 2016 notes, regarding ‘the delivery of 15,950 new dwellings within and around the Main Service Centres, Rural Service Centres and Villages’, that the ‘quantum and distribution of new dwellings has clear implications for potential impacts on European sites’.

Figure 8.4
Not sound
This figure is incomplete, because it does not show the City Farm Site of European Importance for Arable Plants, which could also be added in future to the Conservation Target Areas shown in Figure 8.3.

MIN, Para 8.48
Not sound
Shouldn’t the Garden Village site, and the site to the west of Eynsham, both have Level 2 or Level 3 SFRAs (Strategic Flood Risk Assessments)? Level 1 is surely inadequate, even if it has been ‘revisited’.

MIN, para 8.50
Not sound
The Local Plan mentions ‘climate change’ about 25 times. But one wonders whether this is rather a formulaic use of the term. With regard to flood risk in particular, the principle should presumably be pre-caution rather than re-action. I am not convinced the Local Plan carries that commitment.

The West Oxfordshire Level 1 SFRA 2016 makes it clear, from its maps, that the northern fringe and the whole eastern section of the Garden Village are at substantial risk of flooding from watercourses, groundwater or surface...
water. The document says that Eynsham is one of the settlements affected by the Evenlode and Windrush flood plains; that the potential for groundwater flooding is greater in Carterton, Witney, Eynsham and Woodstock; that there is an Environment Agency Flood Warning Area from Eynsham Mill to Cassington Mill (Table 9.2 – Evenlode), making the Garden Village the only proposed development site directly adjacent to such a Warning Area; that there is a smaller localised area of Functional Flood Plain along Chil Brook; and that the southern part of the Eynsham-Woodstock Sub-Area is dominated by high susceptibility (75%+) to flooding from groundwater, where the land is a natural low-lying valley bottom. Given that paragraph 8.2 of the SFRA states that ‘residential elements should be restricted to areas at lower probability of flooding’, it begins to look as though the two proposed sites next to Eynsham are not suited to large-scale development. After all, in any development of this kind, 30%–40% is considered reasonable for the impermeable area of the site (North Witney Level 2 SFRA). Where is the water that would be absorbed by that area going to?

Likewise, the West Oxfordshire Water Cycle Study of November 2016 points out that: ‘The urbanisation of large areas of land alters the way in which rainfall can drain away and has the potential to increase the rate and amount of water that enters watercourses causing an increase in flood risk.’

Now add climate change to this mix of flood risk ingredients.

8.12 Biodiversity

8.16 ‘the landscape context of the site and the habitat connectivity beyond its boundaries should be taken into account.’ This should apply to the highly biodiverse 650 acre organic farm of Robert Crocker on the garden village site, and his valuable work on extensive wildlife rich hedgerows to make wildlife connections. The value of this site and the impact of development should be rigorously tested and full mitigation proposed. It does not appear on Figure 8.3 or 8.4. Is information up to date?

Local Plans and ancient woodland – Forestry Commission approach

The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.

A summary of Government policy on ancient woodland


Section 40 – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.

National Planning Policy Framework
Paragraph 118 – “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”.


This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a non-statutory consultee [http://www.forestry.gov.uk/forestry/INFD-9B0UH7N] on “development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) [as defined and recorded in Natural England’s Ancient Woodland inventory [http://www.gis.naturalengland.org.uk/pubs/gis/tech_aw.htm] ), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings”

It notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.


The Forestry Commission has prepared joint standing advice [https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences] with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.

The Standing Advice website will provide you with links to Natural England’s Ancient Woodland Inventory [http://www.gis.naturalengland.org.uk/pubs/gis/tech_aw.htm], assessment guides and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. Case Decisions demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our website [http://www.forestry.gov.uk/forestry/infd-9hbk4].


Page 24: Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs).
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Paragraph 2.53 - This has a "renewed commitment to conserving and restoring ancient woodlands".

Paragraph 2.56 – "The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites".


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Renewable & low carbon energy

The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.

Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.

Flood risk

The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.

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In the wider planning context the Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives [http://www.forestry.gov.uk/forestry/infd-9asbjw] as part of a wider integrated landscape approach. For instance through:

* the inclusion of green infrastructure [http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/] (including trees and woodland [http://www.forestry.gov.uk/forestry/BEEH-A6LMEZ]) in and around new development; and
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<td>MM332</td>
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<td>Ms</td>
<td>Couch</td>
<td>619</td>
<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 69</td>
<td>* the use of locally sourced wood in construction and as a sustainable, carbon lean fuel [<a href="http://www.forestry.gov.uk/communitybiomass">http://www.forestry.gov.uk/communitybiomass</a>].</td>
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| MM380         | Berks, Bucks and Oxon Wildife Trust | BBOWT - Haidrun Breith | Mrs       | Breith            | 775        | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 69 | We propose minor changes to the wording in para. 8.21 (Main 69):  
"Development proposals directly or indirectly affecting or related to these and other ecologically important areas will need to be appropriately assessed and follow the mitigation hierarchy of avoidance, mitigation and compensation. As such developments will be expected to ensure that any potential harm is avoided. However in exceptional cases when harm cannot be avoided, then the impact on biodiversity will need to be fully mitigated and only as a last resort compensated. Some potential areas of improvement are identified in the Infrastructure Delivery Plan (IDP). In order to ensure there is no net loss of a net gain in biodiversity, the enhancement of biodiversity within developments will be a requirement, for example, habitat creation and provision of features for species."  
We welcome the detail provided in para. 8.22 and recommend the following text to be added to the end of this paragraph:  
Para 8.22 [...]  
Development proposals must clearly demonstrate that an overall net gain in biodiversity is being achieved. The established method for measuring this is through the use of the metric (or Biodiversity Impact Assessment calculator) produced as part of the DEFRA Biodiversity Offsetting guidance or a locally derived guidance as it is currently being developed for Oxfordshire.  
We welcome the inclusion of biodiversity enhancing measures in para 8.23. Para 118 of the NPPF requires local planning authorities to encourage the incorporation of biodiversity in and around developments. However more detail than this will be needed in order to comply with the NPPF policy.  
Either the main document of the Local Plan, or a separate Design Guide, should provide detail on ways in which the above can be achieved, and what the Council expects. The text should emphasise that biodiversity in built development is not only about helping wildlife. It is also about creating a much better environment for people, and also about wider "ecosystem service" benefits to people. There is clear evidence that wildlife habitat in urban areas can also have a highly significant beneficial effect for humans by:  
* reducing the urban heat-island effect in a warming world where summer heatwaves will make any urban areas dominated by tarmac, concrete and bricks (as opposed to street trees, wetlands and other green space) increasingly unbearable and dangerous to health;  
* reducing air pollution, particularly by removing gaseous pollutants from vehicle exhausts, such as nitrogen oxides and particulates from vehicle exhausts that are increasingly shown to be harmful to human health;  
* reducing flood risk, by increasing infiltration and therefore slowing run-off into watercourses.  
BBOWT can provide further detail for a Biodiversity in Built Development section if required. |
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The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.

In the wider planning context the Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives [http://www.forestry.gov.uk/forestry/infid-9asb JW] as part of a wider integrated landscape approach. For instance through:

- the inclusion of green infrastructure [http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/] (including trees and woodland [http://www.forestry.gov.uk/forestry/BEEH-A6LMEZ]) in and around new development; and
- the use of locally sourced wood in construction and as a sustainable, carbon lean fuel [http://www.forestry.gov.uk/communitybiomass].

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| MM332         | Ms Couch                | Ms Couch        | 621              | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 70 | 8.32 Decentralised, Renewable and Low Carbon Energy Development
<p>|               |                         |                 |                  |            |                    | Generally I support changes here, but it could go further. I welcome mention of community energy - Oxfordshire is leading the way nationally and there is an opportunity to build on this. |
|               |                         |                 |                  |            |                    | 8.32 Disagree with this conclusion; 'An assessment of renewable and low carbon energy for West Oxfordshire (LDA 2016) concluded that, in the short term at least, the District has the potential to deliver greater carbon savings through new renewable energy infrastructure than can be achieved through the development of new low carbon buildings.' Eynsham Neighbourhood Plan proposes Passivhaus standards. |
|               |                         |                 |                  |            |                    | 8.33a Community energy Eynsham has a special place here. Given that Eynsham had the Low Carbon Hub’s first community pv schemes (mentioned in the Local Plan) and the Peoples’ Power Station has just been officially launched (<a href="https://peoplespowerstation.org">https://peoplespowerstation.org</a>) we are well placed to have further involvement. The Low Carbon Hub are doing great work piloting energy storage, decentralized energy (mentioned in Local Plan) use of woodfuel (also mentioned in Local Plan) and also given the pioneering research in Oxford ECI etc we should put a marker down that we want to be the place that makes these ideas work. |
| MM373         | Gloucestershire County Council | Robert Niblett | Mr Niblett | 708            | &gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 70 | The plan covers biodiversity well. The text of the Local Plan has been updated with tracked changes and shows that GCC’s suggestion to include a reference to Nature Improvement Areas (NIAs) in policy EH2 has been taken up. This is most welcome given that the Cotswold Valleys NIA covers both Gloucestershire and West Oxfordshire. Policy EH2 itself is still just called ‘Biodiversity’ although it also covers geodiversity. The title above paragraph 8.12 |</p>
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| MM380        | Berks, Bucks and Oxon Wildlife Trust | BBOWT - Haidrun Breith | Mrs Breith | 780 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 70 | We propose the following changes to the wording of policy EH2 - Biodiversity (Main 70):

Policy EH2 - Biodiversity

The biodiversity of West Oxfordshire shall be protected and enhanced to achieve an overall net gain in biodiversity and minimise impacts on geodiversity, including by:

- giving sites and species of international nature conservation importance and nationally important sites of special scientific interest the highest level of protection from any development that will have an adverse impact;

- requiring a Habitats Regulations Assessment to be undertaken of any development proposal that is likely to have a significant adverse effect, either alone or in combination, on the Oxford Meadows SAC, particularly in relation to air quality and nitrogen oxide emissions and deposition;

- protecting and mitigating for impacts on priority habitats, and protected species and priority species, both their importance individually and as part of a wider network;

- avoiding loss, deterioration or harm to locally important wildlife and geological sites and sites supporting irreplaceable habitats (including ancient woodland and aged or veteran trees), UK priority habitats and priority species, except in exceptional circumstances where the importance of the development significantly and demonstrably outweighs the harm and the harm can be mitigated through appropriate measures and a net gain in biodiversity is secured;

- ensuring development does not prevent the achievement works towards achieving the aims and objectives of the Conservation Target Areas (CTAs) and Nature Improvement Areas (NIAs);

- promoting the preservation conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, particularly within the CTAs and NIAs;

- taking all opportunities to enhance the biodiversity of the site or the locality, especially where this will help deliver networks of biodiversity and green infrastructure and UK priority habitats and species targets and meet the aims of Conservation Target Areas CTAs;

- ensuring that all applications that might adversely affect biodiversity are accompanied by adequate ecological survey information in accordance with BS 42020:2013

- all major and minor applications demonstrating a net gain in biodiversity in a quantifiable way through the use of a Biodiversity Impact Assessment calculator based on that described in the DEFRA Biodiversity Offsetting guidance or a suitably amended version.

- All development retaining features of biodiversity value on site and incorporating biodiversity enhances features.

All developments will be expected to provide towards the provision of necessary enhancements in areas of biodiversity importance. |
| MM64         | Transition              | Rosalind Kent    | Mrs Kent        | 1187       | > SECTION 8 - ENVIRONMENTAL | Green TEA recommends the planting of more native, forest-scale trees in Eynsham, and, in addition, apple and nut trees, rather than small new ornamentals. This would provide a source of food locally if importation becomes As well as Policy EH2 should for clarity be changed to 'Biodiversity and Geodiversity'. |
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<tr>
<td><strong>Policy EH3 – Public Realm and Green Infrastructure (Main 71)</strong></td>
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<td>We welcome the inclusion of a Green Infrastructure Policy but are concerned that EH3 seems to focus on open space, which we consider too restrictive. As mentioned above we are of the impression that no GI Strategy for the district exists and we recommend that this is developed to complement existing studies (eg open space study) to ensure that opportunities for GI are maximised as part of developments.</td>
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<td>Comprehensive wording for a GI policy has been developed in connections with Local Plans in Hertfordshire, which we find useful and provide as example wording for your information and consideration:</td>
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<td>Green Infrastructure Policy wording as being used in Hertfordshire (with some minor changes reflecting West Oxfordshire):</td>
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I. A diverse network of accessible, multi-functional green infrastructure across the district will be protected and enhanced for its biodiversity, recreational, accessibility, health and landscape value and for the contribution it makes towards combating climate change.

II. Development proposals should:

(a) Avoid the loss, fragmentation or functionality of the green infrastructure network, including within the built environment, such as access to urban waterways;

(b) Maximise opportunities for improvement to the green infrastructure network in accordance with the Council's Green Infrastructure Plan, its Open Spaces Strategy, Playing Pitch strategy, Living Landscape Schemes, locally identified Nature Improvement Areas and any future relevant plans and programmes as appropriate;

(c) Maximise opportunities for urban greening such as through appropriate landscaping schemes and the planting of street trees; |
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| MM380         | Berks, Bucks and Oxon Wildlife Trust | BBOROT - Haidrun Breith | Mrs | Breith | 785 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 71 | (d) Consider the integration of green infrastructure into proposals as an alternative or to complement ‘grey’ infrastructure.  
(e) Demonstrate how lighting will not adversely impact on green infrastructure that functions as nocturnal wildlife movement and foraging corridors.  
III. Contributions towards local green infrastructure projects will be sought where appropriate. If providing green infrastructure as part of a development, applicants should detail how it will be maintained in the long term.  
IV. Proposals which affect the district’s river environments, including built development and recreation and leisure proposals, should take into account and contribute towards achieving, the aims of any statutory or non-statutory plans, such as Cotswolds AONB Management Plan. |
| MM451         | English Heritage | Historic England | Mr | Small | 1064 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 72 | Historic England welcomes and supports Proposed Main Modification MAIN72 for its recognition of the need to consider the rich historic environment of West Oxfordshire as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework. |
| MM64          | Transition Eynsham Area | Rosalind Kent | Mrs | Kent | 1191 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 72 | We disagree with the statement; “An assessment of renewable and low carbon energy for West Oxfordshire (LDA 2016) concluded that, in the short term at least, the District has the potential to deliver greater carbon savings through new renewable energy infrastructure than can be achieved through the development of new low carbon buildings.” Passive House/Zero Carbon standards should be the priority for long term savings.  
This is an excellent opportunity for Eynsham to put into practice some of the energy-saving ideas of the Environmental Change Institute and the Low Carbon Hub! |
| MM446         | OxLEP Limited | Sarah Beal | Ms | Beal | 1034 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 73 | Support modifications to reflect and highlight the recommendations of the Council’s updated evidence on renewable and low carbon energy and to provide a clear policy steer on the approach to be taken in locating and designing new renewable and low carbon energy schemes. |
| MM722         | Graham Flint | Mr | Flint | 1629 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 73 | The requirement for all residential developments of 100 or more dwellings to prepare an energy assessment which assesses viability for decentralised energy systems, including consideration of wood fuel biomass and other renewable energy initiatives is unreasonable as a decentralised energy system for a scheme this small is unlikely to be viable and the Council have provided no evidence to demonstrate that it would.  
The Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire (October 2016) by |
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<td>MM749</td>
<td>Home Builders Federation Ltd</td>
<td>Home Builders Federation Ltd Mr J Stevens</td>
<td>-</td>
<td>1830</td>
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<td>Ms Couch</td>
<td>-</td>
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<td>Mr Pearce</td>
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<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 74</td>
<td>The Local Plan notes that Sustainable Drainage Systems (SuDS) can reduce pressures on sewer infrastructure. But where will these SuDS (including ponding, swales, etc) go, and will they further reduce the area for housing, roads and other urban structures? In addition, the West Oxfordshire Water Cycle Study notes that the Garden Village will require a new permit to discharge for Cassington Waste Water Treatment Works (WwTW), and that an Outline Study will be required. When will this be done?</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>565</td>
<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 74</td>
<td>MAIN 74, Para 8.55 Not sound</td>
</tr>
<tr>
<td>MM792</td>
<td>Alvescot Parish Council</td>
<td>Mrs Hoad</td>
<td>2322</td>
<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 75</td>
<td>Main 75: policy EH5 Flood risk The additional reference to mitigating pressure of sewerage systems is welcomed in light of the problems at Lower End highlighted above (MAIN16)</td>
</tr>
<tr>
<td>MM349</td>
<td>Sue Ayers</td>
<td>Ms Ayers</td>
<td>650</td>
<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 75</td>
<td>West Oxfordshire falls within an area of demonstrable ‘water stress’ and planned growth and other pressures are forecast to lead to a supply demand deficit in the next ten years. The West Oxfordshire Water Cycle Study: Phase 1 Scoping (2016), in assessing the impact of the Local Plan upon the water environment and water infrastructure provision, concludes there is strong justification for West Oxfordshire to have a water efficiency policy in line with the Building Regulations optional requirement of 110l/h/d. This will support Thames Water’s resource management planning and help to achieve more sustainable water usage.’ Acknowledging that this is an area of ‘water stress’ and that the landscape is threatened by poor management of drainage maintenance, also either cultivation of flood plain pastures or excessive development on the flood plain, I fail to see how building properties designed to ‘manage water use’ will in any way address the main problems. I also note there is no mention of the existing sewage problems which must be exacerbated by adding more properties to the system. Designing sewage treatment on new developments does not solve old problems. The system in Hailey Parish that was built over 75 years ago to manage a population half its current size and that included its own treatment works which has since been closed. Every time flooding occurs the sewage system is breached allowing ‘foul water’ into the rain water system and thence into the rivers. Do the council intend to replace all the sewer pipes and increase the capacity of the treatment works so that it no longer smells or are they expecting the developers to undertake or pay for this task as that is what I consider needs doing. I have spoken to a local water engineer, who installed his own water treatment center in his garden as he said that fish had become infertile due to oestrogen in the water and many had died as a result of the water pollution from the treatment works. The standards had been considerably reduced as a result of adopting standards set by the EU as opposed to those previously used. Finally I must add that allowing the residents a response time of just 6 weeks, prior to Christmas when it must be</td>
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<tr>
<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1188</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
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<td>MM157</td>
<td>Declan Haverty</td>
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| MM491 Crest Strategic Projects Crest Strategic Projects | Crest Strategic Projects Crest Strategic Projects | - Crest Strategic Projects | 1432 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 80 | Main 80: Paragraph 8.85  
5.1 The guidance within this paragraph follows that set out in the NPPF (para.132), although it is notable that the wording has changed to reduce the threshold for allowing development where harm to designated heritage assets arises. Formerly the Plan provided that development that caused harm to designated assets should be allowed only in exceptional circumstances and where a clear and convincing justification on the grounds of public benefits exists. The test is now relaxed (in the context of this Plan), although the clear and convincing justification for harm on the grounds of public benefit is retained, in line with the NPPF.  
5.2 This approach is considered to be sound, although as is set out elsewhere in these representations, the Council has not followed its own advice in selecting draft allocations for inclusion in the Local Plan. As a consequence this paragraph is not consistent with the overall strategy that the Council has adopted. |
| MM451         | English Heritage        | Historic England| Mr               | Small             | 1068       | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 81 | Historic England welcomes and supports Proposed Main Modification MAIN81 for the replacement of “preserve” with “conserve”, which is more consistent with the National Planning Policy Framework and the addition of new paragraph 8.90a on heritage at risk as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework. |
| MM626 Charlbury Conservation Area Advisory Committee Juliet West Mrs West | Charlbury Conservation Area Advisory Committee Juliet West Mrs West | 1424 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 81 | Para 8.88  
The meaning of the wording in relation to Conservation Areas is unclear. Is this paragraph intended to mean that new development in Conservation Areas should conserve or enhance the area itself or only its setting? Surely it should do both? ‘Conserve’ is the term used in the NPPF but the Planning(Listed Buildings and Conservation Areas) Act 1990 Part II says ‘preserve’ throughout. |
| MM491 Crest Strategic Projects Crest Strategic Projects | Crest Strategic Projects Crest Strategic Projects | - Crest Strategic | 1441 | > SECTION 8 - ENVIRONMENTAL | Main 81: Paragraphs 8.88-8.90a |
5.3 With regard to the Council's approach to treatment and assessment of the historic environment as part of the plan-making process GL Hearn draws attention to the submission from Orion Heritage that supports these representations23 (Appendix 5). It is also necessary to note that Historic England raised objections to the pre-submission Local Plan, which are captured within the Statement of Common Ground between the Council and Historic England, dated 22 October 2015. This is the most up to date publicly stated position on heritage matters arising from the emerging Local Plan policies, benefiting from the input of Historic England.

5.4 In response to the pre-submission consultation exercise Historic England (HE) recorded that the Plan did not include a positive strategy for the conservation/enhancement of the historic environment and as such was unsound. The SoCG advises that HE maintains its objections to 8.88-8.92, and while the modifications appear to have addressed certain of the points raised, HE stated in their representations:

The Plan should make explicit the historic environment evidence base on which it is based or, if that evidence base does not exist, then it should be developed.

5.5 The Council's response within the SoCG is that such information is set out at paragraph 8.89, which 'gives a flavour of the information sources available'. There are no modifications to this paragraph that address the HE objection. This confirms the position that the Council has carried out no proper evaluation of the historic environment as part of the evidence gathering that has informed the Local Plan, contrary to the advice contained within the NPPF (paragraph 169).

5.6 Given the stated importance of the historic environment in West Oxfordshire it is surprising that the Council has not undertaken a comprehensive review of the heritage assets as part of its evidence gathering to inform policy making and published this as part of the evidence base.

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<td>Ms Couch</td>
<td>Ms Couch</td>
<td>630</td>
<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 81</td>
<td>Need to demonstrate that development will not affect the setting of heritage assets— including views in and out of the Eynsham Conservation Area and the Setting of Eynsham Hall and park.</td>
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<tr>
<td>MM451</td>
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<td>Historic England</td>
<td>Mr Small</td>
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<td>OxLEP Limited</td>
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<td>Ms Beal</td>
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<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN 83</td>
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management plans, the completion of a comprehensive list of locally important non-designated assets (and a commitment to its regular updating), the use of Article 4 Directions where appropriate within conservation areas etc. We note (and welcome and support) the positive measures identified in paragraph 8.92, but consider that these should be identified in the actual policy itself (as, for example, in Policy EH2 of the Plan on biodiversity).

It is our understanding from the Council’s Local Development Scheme that the Council does not intend to prepare a DPD with more detailed development management policies to supplement Policy EH7. We note from Appendix 1 of the Plan that Policy CP23 will replace Policies BE5, BE8, BE11 and BE12 in the adopted Local Plan, covering Conservation Areas, the setting of listed buildings, Historic Parks and Gardens and Archaeology. If this is the case, and it is not intended to have any more detailed development management policies for the historic environment or heritage assets, then we do not consider Policy EH7 to be adequate as either a strategic and detailed policy.

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| MM455 | Commercial Estates Group | Commercial Estates Group | - | Commercial Estates Group | 1155 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 83 | Main 83  
Policy EH7 – Historic Environment  
We object to policy EH7 as it does not currently distinguish between setting and significance. The difference of which is set out below:  
Distinction between ‘significance’ and ‘setting’  
Annex 2 (Glossary) of the 2012 NPPF sets out the following definition of significance: Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.  
Setting is defined as: 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, affect the ability to appreciate that significance or may be neutral.' The NPPF is clear that setting is important to the extent that it enables an appreciation of significance. It may contribute positively to an asset’s significance, may detract from that significance or may have a neutral role in significance. Setting is not an asset in itself, that is, of intrinsic value (unless it is designated in its own right).  
The NPPG provides further guidance in relation to setting at paragraph 014 (Reference ID 18a-014-20140306):  
The “setting of a heritage asset” is defined in the Glossary of the National Planning Policy Framework. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.  
Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated |
The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Historic England has published a guidance note: The Setting of Heritage Assets (GPA3) (Historic England, July 2015). GPA3 comprises Historic England’s advice on how one assesses the effects of development in the setting of an asset on its significance or cultural value. The guidance note confirms that setting is not of itself a heritage asset, nor a heritage designation (paragraph 9, page 4). A setting’s importance lies in its contribution to significance.

Setting may or may not contribute to an appreciation of significance. Its value lies in contributing to our ability to appreciation cultural significance. If setting does not make any such contribution, then a change to it will not cause harm.

Accordingly, even a major change to an element of setting does not in principle cause harm, nor is it unacceptable. What matters are the nature of the contribution and the impact on the particular value of an asset.

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<tr>
<th>MM626</th>
<th>Charlbury Conservation Area Advisory Committee</th>
<th>Juliet West</th>
<th>Mrs West</th>
<th>1425</th>
<th>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS &gt; MAIN B3</th>
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| Policy EH? (para? onwards) uses the term ‘considerable weight’ as well as ‘great weight’ which introduces a hierarchy in the degree of weight to be given to conserving the significance of different heritage assets. ‘Great weight’ is reserved for monuments (scheduled or not) and all Registered Parks and Gardens, while World Heritage Sites, listed buildings and Conservation Areas merit only ‘considerable weight’. This does not reflect para 132 of the NPPF which
1) uses the term ‘great weight’ for all heritage assets
2) states that World Heritage Sites, grade I and II* listed buildings and grade I and II* Registered Parks and Gardens are assets of the highest significance.

Para 7 of Policy EH7 says that ‘considerable weight’ will be given to conserving the universal values for which Blenheim Palace and Park is inscribed as a World Heritage Site. This is inconsistent with Policy EW1 Blenheim
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| MM745        | Area Advisory Committee | Richard House  | Mr               | House             | 1797      | AND HERITAGE ASSETS > MAIN 83 | World Heritage Site which says that ‘great weight’ will be given to the conservation and enhancement of the Outstanding Universal Value etc. when assessing the impact of a proposed development on the OUV.  
‘Great weight’ is the wording used in para 132 of the NPPF which says that ‘the more important the asset, the greater the weight should be.’ Para 132 includes World Heritage Sites among the designated assets ‘of the highest significance’ when assessing harm or loss.  
9.1 Policy EH7 regarding the Historic Environment is proposed to be modified to improve clarity and consistency with national policy. Gladman considers that the proposed wording fails to achieve that objective. Firstly, the policy is inconsistent with the NPPF because as currently worded, the policy states that proposals that would lead to any harm to designated assets should be refused unless the public benefit would outweigh that harm, whereas the NPPF provides a very clear process where there is less than substantial and substantial harm and the other aspects within Section 12 of the NPPF, that should be utilised instead.  
9.2 Secondly, the policy fails to differentiate between designated and non-designated assets. As set out in paragraph 135 of the NPPF, the Policy should make clear that where non-designated heritage assets are concerned, a balanced judgement should be made “having regard to the scale of any harm or loss and the significance of the heritage asset.” |
| MM61         | Gladman Developments Limited | Mr | Pearce | 189 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 83 | "Considerable weight and importance will be given to conserving the significance of listed buildings, both with regard to their fabric and their settings.” Let’s hope so. So far, the listed buildings in City Farm have gone unacknowledged. For them, the most important word is "settings", which new development should apparently "conserve or enhance" (paragraph 8.88).  
City Farm’s listed buildings have a rural setting, and one which can be appreciated from the footpaths to the west and north in particular, but also from the east and south. Historic England’s Good Practice Advice in Planning (GPA3) has this to say about "The Setting of Heritage Assets":  
“Negative change could include severing the last link between an asset and its original setting” (the Garden Village will sever all links with City Farm’s original setting).  
“Significance is not dependent on numbers of people visiting it; this would downplay . . . the importance of setting to a local community who may be few in number” (we may be few in number but please don’t ignore us).  
“In particular, it would be helpful for local planning authorities to consider at an early stage whether development affecting the setting of a heritage asset can be broadly categorised as having the potential to enhance or harm the significance of the asset through . . . the scale, proximity or placement of development” (the Garden Village, as proposed, is large, very close and placed entirely around the listed buildings of City Farm).  
The Historic England checklist for assessment of effect of development includes: “degree to which location will physically or visually isolate asset”; “position in relation to key views”; “introduction of movement or activity”; “noise, odour, vibration, dust, etc”; “light effects and light spill”; “change to general character” (eg, suburbanising or industrialising); and “changes to land use, land cover, tree cover”. Clearly much of this checklist is directly relevant to City Farm and the Garden Village. Can we be assured that these criteria will be sufficiently accommodated? I don’t see how that is possible. |
| MM784        | North Witney Land Consortium | North Witney Land | - | 2159 | > SECTION 8 - ENVIRONMENTAL AND HERITAGE ASSETS > MAIN 83 | Policies of the Plan should not seek to replicate those contained within the NPPF and as such it is considered that the current proposed Policy wording is unnecessary. Should the Council wish to retain the Policy, it is important that the requirements are consistent with those set out in the NPPF in order to be sound. Paragraph 133 of the |


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<td>Consortium</td>
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<td></td>
<td>ASSETS &gt; MAIN 83</td>
<td></td>
<td>NPPF makes clear that “where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.” The Council’s proposed policy wording fails to differentiate between those instances where substantial harm is identified or where less substantial harm is identified. As such it is considered that the current proposed policy is unsound in that it is not consistent with national policy.</td>
</tr>
<tr>
<td>MM328</td>
<td></td>
<td>Russ Canning</td>
<td>Mr</td>
<td>Canning</td>
<td>612</td>
<td>&gt; SECTION 8 - ENVIRONMENTAL AND HERITAGE</td>
<td>MIN, Para 8.70 Not sound The likely destruction of the David Einig Contracting (DEC) aggregate recycling site by the construction of the Garden Village is illogical and the opposite of sustainable. In particular, it makes a mockery of the statement that use should be made of ‘alternatives to primary land-won aggregates’. It is odd that the existence of DEC has been consistently ignored. MAIN 83, Policy EH7 Not sound ‘Considerable weight and importance will be given to conserving the significance of listed buildings, both with regard to their fabric and their settings’. Let’s hope so. So far, the listed buildings in City Farm have gone unacknowledged. For them, the most important word is ‘settings’, which new development should apparently ‘conserve or enhance’ (Para 8.88). City Farm’s listed buildings have a rural setting, and one which can be appreciated from the footpaths to the west and north in particular, but also from the east and south. Historic England’s Good Practice Advice in Planning (GPA3) has this to say about ‘The Setting of Heritage Assets’: ‘Negative change could include severing the last link between an asset and its original setting’ (the Garden Village will sever all links with City Farm’s original setting). ‘Significance is not dependent on numbers of people visiting it; this would downplay . . . the importance of setting to a local community who may be few in number’ (we may be few in number but please don’t ignore us). ‘In particular, it would be helpful for local planning authorities to consider at an early stage whether development affecting the setting of a heritage asset can be broadly categorised as having the potential to enhance or harm the significance of the asset through . . . the scale, proximity or placement of development’ (the Garden Village, as proposed, is large, very close and placed entirely around the listed buildings of City Farm). The Historic England checklist for assessment of effect of development includes: ‘degree to which location will physically or visually isolate asset’; ‘position in relation to key views’; ‘introduction of movement or activity’: ‘noise, odour, vibration, dust, etc’; ‘light effects and light spill’; ‘change to general character’ (eg, suburbanising or industrialising); and ‘changes to land use, land cover, tree cover’. Clearly much of this checklist is directly relevant to City Farm and the Garden Village. Can we be assured that these criteria will be sufficiently accommodated? I don’t see how that is possible.</td>
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Policy EH7 states "Considerable weight and importance will be given to conserving the significance of listed buildings, both with regard to their fabric and their setting". It is self evident that the proposal to surround the listed farm buildings at City Farm with urban development will remove their agricultural surroundings and destroy their "setting" in contravention of this policy.
### This document is a response to West Oxfordshire’s consultation on its proposed modifications to its Local Plan. It has been prepared by Dominic Lawson Bespoke Planning Ltd on behalf of Socially Conscious Capital. Socially Conscious Capital ("the applicant") are promoting the Land at Curbridge ("the site") for allocation in the Local Plan. The applicant will also be preparing an outline planning application for c110 homes, to be worked up in consultation with local stakeholders, for submission in 2017.

The site 'Land at Curbridge' provides the Council with a superb opportunity to increase its planned housing numbers by 110 dwellings at a site which is suitable, sustainable and deliverable. The site is the land in the central triangle of Curbridge. The land is designated as open countryside in the West Oxfordshire Local Plan 2011 and is in flood zone 1 (very low risk of flooding). There are no other statutory designations affecting the site. The village of Curbridge is located approximately 1.5 miles to the south west of the town centre of Witney.

The site that has been identified and can improve connectivity and support the cohesiveness of the village through a sensitively planned extension within the core of the village, whilst also preserving a broad, green corridor along the Elm Bank Ditch. Although separated by the A40, the land at Curbridge would be a self-sufficient development opportunity in a sought after location. The land at Curbridge is a short cycle ride from the centre of Witney. There is a continuous paved footpath from Curbridge to Witney over the A40 bypass, along the western edge of the A4095.

A careful framework for development that follows and enhances natural desire lines across the village would represent the natural and organic growth of the settlement. Its growth will support the social sustainability and existing facilities of the village whilst providing new homes and amenities within a sought after location. The site 'Land at Curbridge' represents an excellent opportunity for the Council to plan proactively for housing delivery as the site is not constrained by any technical or policy impediments preventing its allocation.

The Village of Curbridge is located approximately 1.5 miles to the south west of the town centre of Witney. The majority of buildings in the village date from the C20th though its origins as a settlement are much earlier. Since the mid C19th, Curbridge has been a civil parish and until 2001 it included the industrial and residential estates to the west of Witney, bounded to the north by Burford Road. The civil parish is now half the size that it was at the beginning of the 20th, its area has reduced as the boundaries of Witney have grown but it still includes the small village of Lew 1.5 miles to the south.

The form of the village of Curbridge is defined by three routes that make up a triangle (each side approximately 500m in length), with a secondary nucleus to the south where the village pub is located. The name of the village on Ordnance Survey maps from the C19th to the present is typically inscribed within this triangle. The grouping along the east-west road from Ducklington to Brize Norton (Main Road) was followed by development along Well Lane in the C20th, establishing a continuous connection between the west end of the village and the nucleus to the south.

In terms of amenities the village is served by a church, a village hall and a pub. There is a play park at the northern end of Well Lane and a recreation field to the south adjacent to the pub. Formerly in the C19th and into the C20th there was additionally a school, a post office, a butcher, a smithy, a Methodist chapel and another pub.

The site is not categorised under any statutory (or local) landscape, nature or heritage designations. There is
an area of deciduous woodland to the north of Main Road that is included in the Deciduous Woodland Inventory. The nearest SSSIs are to the west of Minster Lovell (1.5 miles) and to the east of Ducklington (2 miles). There are 3 Grade II listed buildings to the south of Main Road, each of which is well screened from the proposed development site.

The Bampton Road (A4095) which runs along the eastern boundary of the village is a historic route which was formerly marked by toll houses to the north and south of the village. A detailed history of the village is contained in A History of the County of Oxford (Volume 14, Bampton Hundred, Part Two). It suggests that the original nucleus of the village may have been at the east end of the main street. It states: “it seems likely that the Witney—Bampton road once entered rather than bypassed Curbridge village, its line perhaps preserved in the lane running from Manor Farm to the village street, and continuing southwards as a footpath (now blocked by a house) to rejoin the Bampton road.”

There has been very little development in recent decades despite the expansion of Witney. The last principal phase of the growth of the village was in the 1970s along Well Lane, with occasional infill and building renewal subsequently among pre-existing houses.

Curbridge is an 8-minute cycle ride from the centre of Witney. There is a continuous paved footpath from Curbridge to Witney over the A40 bypass, along the western edge of the A4095. There are buses from the village (Main Road) to Oxford via Witney every 20 minutes at peak times and every half hour at other times. The village is well located in terms of employment, including the nearby local employment centres of Witney and Brize Norton. The majority of the village is contained within a 5-minute walkable catchment of 800m diameter, a recognised, traditional measure of urban form, which assumes reasonable internal connectivity to function as a cohesive whole.

The proposed site is contained within a gentle dip in the landscape so that it is visually contained; both Well Lane and Main Road are at a slightly higher elevation. The site is also screened by trees and hedges to the south and is broken up by vegetation along the Elm Bank Ditch watercourse.

A footpath crosses the site which may follow the original line of the Bampton Road. This is constrained and narrow where it meets Main Road between two houses and there is an opportunity to provide a clearer, wider pedestrian connection 40m to the west, closer to the village hall. This north – south pedestrian link is a natural desire line, providing a connection to the pub and recreation field to the south, and the church, village hall and bus stops along Main Road to the north. The alternative pedestrian route along the side of the A4095 is longer and more isolated. Originally, as shown on maps prior to 1945, there was a second footpath from north to south, emerging on Well Lane beside the existing play park.

The land at Curbridge provides the Council with the opportunity to allocate a site for housing that will increase its planned housing numbers by 110 dwellings. The site that has been identified can improve connectivity and support the cohesiveness of the village through a sensitively planned extension within the core of the village, whilst also preserving a broad, green corridor along the Elm Bank Ditch.

In addition to an expanded village green around the existing play park, there may be an opportunity to provide a village shop, additional homes for the elderly and recreational facilities such as tennis courts, with proposals welcomed from the community. The proposed development would partially screen views to and from the A4095 from post-WWII development within the village. The Grade II listed Thatched Cottage and pre-C20th cottages at the eastern end of the village would retain their open aspect and rural setting.
The urban form of the proposed development would be relatively compact, in keeping with the older parts of the village and making best use of the land, whilst providing for a mix and variety of house types that distinctively belong with the traditional patterns of the area. These homes would in general have parking provided to the rear to ensure that the new streets and lanes are welcoming, actively fronted and not dominated by resident car parking. The principal vehicular access would be from the Bampton Road with the potential for a secondary access from Well Lane. Streets will be designed so as to prioritise the pedestrian over the car user.

Careful landscape design will also ensure that the proposed development beds comfortably and naturally within the existing landscape, providing new opportunities for wildlife and informal recreation alongside improved drainage and wetland habitat. Street lighting also would be sensitively designed so as minimise any light pollution.

A careful framework for development that follows and enhances natural desire lines across the village would represent the natural and organic growth of the settlement. Its growth will support the social sustainability and existing facilities of the village whilst providing new homes and amenities within a sought after location.

The site 'Land at Curbridge' represents a good opportunity for the Council to plan proactively for housing delivery as the site is not constrained by any technical or policy impediments preventing its allocation.

The site is the land in the central triangle of Curbridge. The land is designated as open countryside in the West Oxfordshire Local Plan 2011 and is in flood zone 1 (very low risk of flooding). There are no other statutory designations affecting the site. In the current draft Local Plan, the site is in the Witney sub-area. The settlement of Curbridge is currently designated as a village in the Schedule of Proposed Main Modifications (October 2016) of the Local Plan. Paragraph 9.26 of the Local Plan (Proposed Modifications) states that: "Whilst there are some further opportunities for housing within the built up area of the town of Witney, these are relatively limited and to accommodate future housing needs there is a need to develop on the fringes of the town on Greenfield land. This needs to be carefully balanced with the need to protect the town's setting and the separate identity of nearby villages. There are some further development opportunities within the rest of the sub-area although these are relatively modest in scale."

Paragraph 9.2.24 of the Local Plan (Proposed Modifications) states that: “Opportunities for major development within the built up area of the town [Witney] are relatively limited. This means that development on the fringes of the town will be required to meet future needs. Land to the west of the town (north Curbridge) is already committed by way of a resolution to grant planning permission subject to Section 106. The outline application anticipates 1,000 homes and 10 hectares of new business land but it is quite possible that a modest increase in the number of homes (e.g. to around 1,100) could be achieved as detailed planning applications are dealt with. The remaining strategic options considered through the Local Plan process are to the south, east, north-east north and further west of Witney. There are some further development opportunities within the rest of the sub area although these are relatively modest in scale.

The above statements support the proposal for development in Curbridge in order to help to meet the future housing needs of the District. The land at Curbridge provides the Council with the opportunity to allocate 110 homes at a self-sufficient development that will support the social sustainability and existing facilities of the village whilst providing new homes and amenities within a sought after location.

Paragraph 9.2.32 of the Local Plan (Proposed Modifications) confirms that the land to the west of Witney is a Strategic Development Area and that there is: “limited capacity for further housing development within the
area of Witney and as a result it is necessary for development to take place on undeveloped land on the edge of the town. Land to the west of Witney (north Curbridge) was identified as a reserve site in the previous Local Plan and is now a firm commitment, expected to deliver at least 1,000 homes within the plan period and possibly more as detailed planning applications are dealt with."

This indicates that the focus for development is to the west of Witney. The proposed development at Curbridge is policy compliant and will add 110 dwellings to the Council’s housing figures. The development will play a role in being part of modest growth outside of Witney and in turn strengthen the village of Curbridge whilst maintaining its separate identity.

Paragraph 9.2.33 Local Plan (Proposed Modifications) has been amended to state that further options to the land west, south, east, northeast and north of the town have been considered for development. Land to the east of Witney has now been allocated for 450 homes (up from 400) and land to the north of Witney has now been allocated for 1,400 homes (up from 1,000).

The land at Curbridge provides the Council with the opportunity to allocate 110 homes to the south west of Witney. The location of Curbridge benefits from excellent nearby employment locations such as the centre of Witney which is just a 6-minute drive or 8-minute cycle from the village. The A40 which runs between Witney and Curbridge acts as a natural barrier meaning that although benefiting from facilities and employment opportunities in Witney, Curbridge will remain a separate albeit stronger village.

Paragraph 9.2.50 of Local Plan (Proposed Modifications) states that: “Land to the south of Witney which straddles the boundaries of Ducklington and Curbridge Parishes, whilst physically proximate to the town centre and main employment areas in the south is segregated from the town by the A40. There are concerns regarding noise, odour and landscape impact and unlike the alternative options, the scheme would not deliver any strategic highway improvements for Witney.”

Although separated by the A40, the land at Curbridge would be a self-sufficient development opportunity in a sought after location. The land at Curbridge is an 8-minute cycle ride from the centre of Witney. There is a continuous paved footpath from Curbridge to Witney over the A40 bypass, along the western edge of the A4095.

The village is well located in terms of employment, including the nearby local employment centres of Witney and Brize Norton. This is confirmed in paragraph 9.2.53 in the Schedule of Proposed Main Modifications (October 2016) which states that “Witney will be the focus for additional business and employment opportunities over the period of the Local Plan.”

Its growth will support the social sustainability and existing facilities of the village whilst providing new homes and amenities within a sought after location. In the existing Strategic Housing Land Availability Assessment June 2014 SHLAA), the site is identified as “land at Curbridge” site 142. Site 142 is designated as available and achievable, but not suitable because: “The site is a significant open space that contributes to the character and the setting of the village, particularly in views from the Bampton Road. Development in depth would be out of keeping with the historic linear form of the village which has been subsequently extended with a second linear form along Well Lane.”

In response to the above, whilst the main street lies on an east to west road, the village is not a classic linear settlement, there is a nucleus of the village to the south and historically there is evidence of more north to south routes across the village. Its urban form is not of outstanding significance and limited expansion would
represent organic growth and an evolutionary consolidation of the village.

Based on this argument, the Council’s position does not represent a satisfactory reason not to allocate this site, especially given that the Council has identified that they are unable to meet their housing requirements.

Where the Council cannot demonstrate a five-year housing land supply, paragraph 49 of the National Planning Policy Framework ("the Framework") is clear that "relevant policies for the supply of housing should not be considered up-to-date". Within the context of the presumption in favour of sustainable development, paragraph 14 of the Framework states planning permission should be granted unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;
- or specific policies in this Framework indicate development should be restricted.

The considerable benefits of a carefully planned development providing 110 new homes, community facilities and, in a strategic context, revitalising the village of Curbridge on land that is already contained within the village envelope outweigh any potential adverse impacts of the development.

### Housing Numbers

Following the planning inspector’s interim report in December 2015, the Council was required to do further work on its housing requirement, to make up for historic shortfalls and to take pressure off Oxford City Council as required by the duty to cooperate. Paragraph 5.15 Local Plan (Proposed Modifications) indicates that the Council has accepted that it needs to plan for more housing and proposes to adopt a total of 15,950 new homes in the plan period, 13,200 for its own needs and 2,750 homes to accommodate the needs of Oxford City.

The Land at Curbridge provides the opportunity for the Council to add 110 houses to its housing figures in order to meet its housing requirement and make up for historic shortfalls. The Land at Curbridge is a suitable and sustainable location for housing development and will help the Council with its housing figures whilst strengthening the village of Curbridge through development of 110 homes.

The land at Curbridge provides the Council with the opportunity to move further towards meeting this additional demand whilst strengthening the village of Curbridge and strengthening local services. Allocating the Land at Curbridge site for housing development would allow the Council to engage positively with the landowner and enable the site to be delivered constructively through a plan led development.

<p>| MM75 | AJ04 | Mr Bickley | 217 | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MIN 65 | This section seems to be only dealing with transport problems as they exist at the moment, and ignores the Garden Village and other proposals for new houses that are detailed later. |
| MM723 | Andrew and Moira Parker, Adrian Parker, Martin | - Parker | 1635 | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL | Land at Batts Row, Curbridge This document forms part of the response to West Oxfordshire’s consultation on its proposed modifications to its Local Plan and has been prepared by William Twiddy MRICS |</p>
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<td></td>
<td>Parker</td>
<td></td>
<td></td>
<td></td>
<td>&gt; Witney Sub Area &gt; MAIN 88</td>
<td>on behalf of the landowners.</td>
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The site known as Land at Batts Row Curbridge provides the Council with the opportunity to increase its planned housing numbers by 75 - 85 dwellings on a site which is suitable, sustainable and deliverable. The land is bordered by the A40 dual carriageway to the North and lies within a flood zone 1 area (very low risk of flooding). There are no other statutory designations affecting the site. The proposed site is concealed by existing housing and the adjacent A40 as well as screening provided by existing hedges. Access to the site is excellent.

The village of Curbridge is lies 1.5 miles to the south west of the town centre of Witney. Although separated by the A40, the land at Curbridge is a short cycle ride from the centre of Witney. There is a continuous paved footpath from Curbridge to Witney over the A40 along the western edge of the A4095. In terms of amenities, the village is served by a church, a village hall and a pub. There is a play park at the northern end of Well Lane and a recreation field to the south adjacent to the pub. Previously the village provided a school, a post office, a butcher, a smithy, a Methodist chapel and a second pub. The site is not categorised by any statutory (or local) landscape, nature or heritage designations. The nearest SSSIs are to the west of Minster Lovell (1.5 miles) and to the east of Ducklington (2 miles). There are 3 Grade 11 listed buildings to the south of Main Road, each of which is well screened from the proposed development site.

There are buses from the village (Main Road) to Oxford via Witney every 20 minutes at peak times and every half hour at other times. The village is well located in terms of employment, including the nearby local employment centres of Witney and Brize Norton.

The land at Curbridge provides the Council with the opportunity to allocate a site for housing that will increase its planned housing numbers by 75 - 85 dwellings on a site with excellent access on foot, by cycle and by public transport to Witney.

The site would be brought forwards with a scheme that provides a variety of house types that will be drawn from traditional designs from the district with an emphasis on off road parking to avoid clutter whilst still retaining a wildlife corridor alongside the A40 to avoid unnecessary fragmentation of habitats and providing improved dedicated areas for wildlife within the site boundary. Street lighting would be sensitively designed so as minimise any light pollution.

In terms of compliance with planning policy the land lies just to the north of the core of Curbridge. Which lies in the Witney sub-area. Curbridge is currently designated as a village in the Schedule of Proposed Main Modifications (October 2016) of the Local Plan. Paragraph 9.26 of the Local Plan (Proposed Modifications) states that:

"Whilst there are some further opportunities for housing within the built up area of the town of Witney, these are relatively limited and to accommodate future housing needs there is a need to develop on the fringes of the town on Greenfield land. This needs to be carefully balanced with the need to protect the town's setting and the separate identity of nearby villages. There are some further development opportunities within the rest of the sub-area although these are relatively modest in scale."

Paragraph 9.2.24 of the Local Plan (Proposed Modifications) states that:
Opportunities for major development within the built up area of the town are relatively limited. This means that development on the fringes of the town will be required to meet future needs. Land to the west of the town (north Curbridge) is already committed by way of a resolution to grant planning permission subject to Section 106. The outline application anticipates 1,000 homes and 10 hectares of new business land but it is quite possible that a modest increase in the number of homes (e.g. to around 1,100) could be achieved as detailed planning applications are dealt with. The remaining strategic options considered through the Local Plan process are to the south, east, north-east and further west of Witney. There are some further development opportunities within the rest of the sub-area although these are relatively modest in scale.

We consider the above statements support the proposal for development in Curbridge in order to meet the housing needs of the District. The land at Curbridge would enable the Council the opportunity to allocate 75 - 85 homes within a sought after location lying within easy reach of a substantial area of employment land as well as education and other facilities.

Paragraph 9.2.33 Local Plan (Proposed Modifications) has been amended to state that further options to the land west, south, east, northeast and north of the town have been considered for development. Land to the east of Witney has now been allocated for 450 homes (increased from 400) and land to the north of Witney has now been allocated for 1,400 homes (increased from 1,000).

The site offers a self-sufficient development site in a sought after location. The land at Curbridge is an 8 minute cycle ride from the centre of Witney. There is a continuous paved footpath from Curbridge to Witney over the A40 bypass, along the western edge of the A4095. The village is well located in terms of employment, including the nearby local employment centres of Witney and Brize Norton. This is confirmed in paragraph 9.2.53 in the Schedule of Proposed Main Modifications (October 2016) which states that

"Witney will be the focus for additional business and employment opportunities over the period of the Local Plan."

Following on from the planning inspector’s interim report in December 2015, the Council was required to do further work on its housing requirement, to make up for historic shortfalls and to take pressure off Oxford City Council as required by the duty to cooperate. Paragraph 5.15 Local Plan (Proposed Modifications) indicates that the Council has accepted that it needs to plan for more housing and proposes to adopt a total of 15,950 new homes in the plan period, 13,200 for its own needs and 2,750 homes to accommodate the needs of Oxford City.

As such the land at Curbridge provides the Council with the opportunity to move further towards meeting this additional demand whilst revitalising the village of Curbridge and strengthening local services. Allocating the Land at Curbridge site from housing development would allow the Council to engage positively with the landowner and enable the site to be delivered constructively through a plan led development.
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td>797</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 88</td>
<td>MAIN 88 Paragraph 9.2.24 Potential for growth in the Witney sub-area Stagecoach notes that the draft plan suggests that there may be further limited appropriate opportunities for growth identifiable in some of the larger villages in the sub-area. While in many respects these may be unconstrained and could help address locally arising housing need, we would strongly caution that opportunities in many or indeed most smaller settlements in the sub-area would prove to be exceptionally car-dependent, as public transport availability in many is very limited or practically absent, to a very great extent as a result of the withdrawal of the County’s budget for supported bus services in July 2016.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr Small</td>
<td>1072</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 89</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN89 for the recognition that the conservation and enhancement of the historic environment is an important issue in Witney as it includes many heritage assets, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework.</td>
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<td>MM491</td>
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<td>Crest Strategic Projects</td>
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<td>1442</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 90</td>
<td>Main 90 6.1 For reasons set out in representations to Main 91 and subsequently, Table 9.1 should be amended to remove the uplift in housing proposed at the East Witney SDA and at the North Witney SDA. The figures assigned to each should be revised downwards to 400 and 1,000 dwellings respectively.</td>
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<td>MM755</td>
<td>Bushey Ground Consortium</td>
<td>Bushey Ground Consortium</td>
<td>-</td>
<td>1896</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 90</td>
<td>We have made presentations to you on behalf of our clients, the Dowley, Conlon, Brooks, Williams and Huntly families over a number of years during the ongoing review of the Local Plan, seeking to have their land at Brize Norton Road/Bushey Ground, Minster Lovell allocated for housing, including your most recent SHLAA call for sites consultation in February this year and put forward their land as being available and suitable for such a use. Previous ref 262. We note that in the latest version of the Draft Plan a site for 85 dwellings has been proposed on a back land site adjoining the north west edge of the village and that following a planning application this site has been granted consent in the last month. We believe the Council may find the need to allocate more dwellings in sustainable settlements like Minster Lovell and our clients site is both suitable and available. There is an existing access via Bushey Ground which already serves a number of existing dwellings and businesses. We realise this site is not large enough to be seen as a strategic one, but given the draft plan modifications have now included/identified a number of non-strategic sites ranging from 25 to 300 dwellings, we believe this site should have been included as well – so Modification Main 26 (para5.30b) should be amended to include this site and likewise Main 90 Witney sub Area table 1 and again Main 115. We anticipate the Council may find there will prove to be a need to provide more deliverable sites like this because the larger sites are either not deliverable quickly or worse not at all within the Plan period. In Main 104 paras 9.2.51 a,b and c - our clients support the principle of extending development westwards from Downs Road and linking Downs Road to B4047. There is a four way link interchange proposed to the A40 at Downs road and possibly another may be provided at the B4477 at Minster Lovell.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 90</td>
<td>Please take this letter as a repeat of our earlier representations – our client's land is still available for housing and possibly some element of employment and hope that you will now reconsider it for inclusion in your new allocations in the final draft plan before it goes before the EIP in March/April 2017. We would be happy to discuss any aspect of this further with you if that would assist you. We attach a plan showing the land verged pink.</td>
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Given the concerns that the Council themselves have raised in relation to delivery with a higher housing rate, it is considered prudent to allocate sites where possible. In this respect, we consider that in relation to the Witney sub-area – a further allocation could be made at Hailey. Hailey is the same category village as Minster Lovell (which benefits from an allocation and outline consent for 85 dwellings) and yet does not benefit from any allocation within the plan. No distinction is drawn by the Council in selecting one site / area over another despite the sustainable location of Hailey and its lack of physical / policy constraints.

We propose a new policy as follows (following the policy approach taken in respect of Minster Lovell):

Land South West of Charlbury Road, Hailey (B4022) (85 homes) (Appendix 1)

This is a greenfield site currently given over to arable crops however the site is confirmed on DEFRA maps as Grade 3b land and thus does not represent Best and Most Versatile Land (BMVL). The site is just under 5.3ha in size in total however not all of the site will be given over to development. The anticipated number of dwellings is around 85. Hailey is a sustainable settlement close to Witney and offering its own range of services and facilities. It benefits from a regular bus service giving good connections to both Finstock railway station and Witney including a direct link to Sainsburys and the town centre.

Importantly the site is next to an existing area of relatively dense, more modern development that is not characteristic of the historic core of Hailey which has a very linear form. The scale of the proposed development is such that it would integrate with rather than dominate the existing village. The development also offers the opportunity to enhance the Conservation Area and the northern edge of the settlement approach to Hailey.

The site has been submitted for consideration by a promoter demonstrating a clear developer interest in bringing the site forward in the short-term. Key considerations for the site include the mitigation of landscape and visual impact, albeit the site is not within or adjacent to the Cotswolds AONB (and has limited intervisibility between the site and AONB which is over 700m from the site with a ridgeline in between), and the need to ensure effective integration with the existing village and the need to reflect existing patterns of development.

New Policy WIT2c – Land South West of Charlbury Road, Hailey

Key issues to be addressed as part of any development proposal will include:

a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 - Affordable Housing;

b) the provision of primary vehicular access from the B4022;
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<td>c) protecting key views to/from the site; d) effective integration with the existing village including consideration of any pedestrian and cycle linkages; e) a positive enhancement of the northern edge of Hailey; f) development layout that respects the existing built form to the east of the site; g) appropriate provision of and contributions towards supporting infrastructure; h) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements; h) the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement; i) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</td>
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<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2184</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 90</td>
<td>Table 9.1 sets out the anticipated housing delivery in the Witney Sub-Area. The Sub-Area has been set an indicative housing requirement of 4,400 new dwellings to assist in meeting the District wide requirement of 13,200 new dwellings. As is clear from Table 9.1, the Plan as currently drafted would only deliver 4,386 new dwellings in the Sub-Area. Clearly therefore not only is the overall Plan failing to make adequate provision for its housing requirement, this is also specifically the case within the Witney Sub-Area. As discussed above in relation to the overall housing land supply, it is important that the Plan not only makes sufficient provision to meet the objectively assessed need for the District but also, as required by the NPPF, allows sufficient flexibility to allow for changing circumstances. Whilst additional housing could be provided for through Neighbourhood Plans there is no guarantee of this, and no mechanism in place in the policy should they not deliver. As currently drafted there is therefore concern as to whether the Plan will meet the housing requirement for the Sub-Area and the District as a whole. This proposed main modification in so far as it relates to the North Witney SDA is however supported in principle for the reasons set out above, to reflect the proposed increase in the housing requirement for the Witney sub-area and the revised approach in relation to housing delivery.</td>
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A great deal of work has already been undertaken in a short time to model the impacts of the increased housing growth. However, more detailed modelling associated with the Witney Area Transport Strategy refresh is ongoing and there will be a need to further assess the impact of the additional growth in Witney. Any identified schemes will need to be fully assessed and developed as the allocated sites evolve.

6.2 To help address the uplift in the housing requirement for West Oxfordshire, the main modifications increase the allocation of dwellings to the Witney sub-area from 3,700 to 4,400 over the plan period. A large proportion of the uplift is met through the expansion of the Strategic Development Areas at North and East Witney. The remaining additional housing is planned to be delivered at two smaller non-strategic allocations and partly through additional planning commitments (with the most significant additional commitment for 260 dwellings at Burford Road, Witney). Paragraph 9.2.28 indicates further sites will be identified through a subsequent review of the Local Plan.

6.3 The soundness of this approach is challenged on the following grounds:

1) The deliverability of the planned level of housing at the selected strategic development sites over the plan period and the implications upon the effectiveness of the Local Plan;

The majority of the growth planned for this sub-area is anticipated to come forward at three strategic sites:

* West Witney (1,000 units) (Commitment);
* North Witney (1,400 units) (SDA); and
* East Witney (450 units) (SDA).

6.4 There is no issue in principle with allocating strategic scale housing development at either North or East Witney; the benefits of well-planned, carefully considered large strategic sites are clear, they offer long term co-ordinated growth, where social and transport infrastructure meeting the needs of new residents can be delivered in a comprehensive manner. However, these particular strategic sites have specific issues which will likely result in significantly increased timescales for their development and consequent delays in housing delivery, calling into question whether they will deliver in full during the plan period.

6.5 West Witney: The site is identified within the draft Local Plan as an existing large planning commitment for 1,000 dwellings. An outline planning application for a development comprising up to 1,000 dwellings, employment space, education provision and local retail and community uses with associated infrastructure (reference 12/0084/P/OP) was submitted in January 2012. WODC Planning Committee resolved to approve the application in March 2013, pending completion of Section 106 and 278 agreements. The necessary agreements have yet to be completed well over three years since the Committee resolution and some four years since submission of the application. It must be questionable whether it is safe (from a judicial perspective) to continue to treat the site as a commitment, or whether the Council should reconsider the application (and the continuing validity of the associated EIA) before issuing the decision.

6.6 The Statement of Common Ground27 between WODC and the developers submitted during the Examination (dated October 2015) states:

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<td>identify development of a scale and in a location that would enable the required infrastructure to be provided. A great deal of work has already been undertaken in a short time to model the impacts of the increased housing growth. However, more detailed modelling associated with the Witney Area Transport Strategy refresh is ongoing and there will be a need to further assess the impact of the additional growth in Witney. Any identified schemes will need to be fully assessed and developed as the allocated sites evolve.</td>
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“During the intervening period the Consortium, District and County Councils have worked closely to agree the wording of the necessary legal agreements, which are now in a final form and awaiting approval by the landowners. The Consortium, expects the agreements to be completed during October 2015, with the decision notice issued accordingly”.

6.7 A full year after the date of this Statement of Common Ground, these agreements have yet to be completed and the Decision Notice has yet to be issued.

6.8 It is noted from the original Planning Statement for the application that the promotion of this site began in 1996, demonstrating the length of time taken to reach the stage of submitting an outline planning application (before any detailed reserved matters submission and discharge of pre-commencement conditions, let alone any homes being completed). Furthermore, Condition 5 attached to the Officers’ Report to Planning Committee extends the standard time limit for development to up to 12 years (or two years from the last Reserved matters approval). This indicates that the Council anticipated long lead-in time to development and, by association, completion. This calls into question projected delivery rates outlined within Main Modification 2012, which anticipates the development commencing in 2018, with completion by 2025/26.

6.9 The pending Section 106 agreement associated with the application will secure the provision of a new ‘all movements’ junction onto the A40 at Down’s Road to the west of Witney (A40/Down’s Road junction). Draft condition 16 requires the infrastructure to be completed and operational prior to occupation of the 200th dwelling, which suggests that implementation challenges remain once the decision notice is finally issued.

6.10 Viability concerns have long been associated with the West Witney proposals, which were raised initially during assessment of the planning application. The Committee Report advised that the developers had provided a viability appraisal, which relied upon a developer’s profit margin lower than is generally accepted by the development industry. An independent appraisal commissioned by the Council at the time concluded that a viability gap exists, which would necessitate viability considerations being revisited at key stages of the development.

6.11 The Infrastructure Delivery Plan (IDP) Update 2016 identifies the Down’s Road/A40 junction improvements as ‘Critical’ and to be delivered within the timescale 2016 – 2018 as a prerequisite for development at West Witney. The estimated cost of the infrastructure (2012) is identified as £6.1 million, with only £1.25 million currently subject to existing Section 106 agreements. The Infrastructure Funding Gap Analysis (2015) sets out the extent of the funding gap for projects across the District and notes that strategic highway schemes such as the Down’s Road/A40 junction improvements will be funded in full via Section 106 agreements.

6.12 On this basis the Council anticipates that the funding to deliver this infrastructure (at 2012 costings c. £4.85mn) will be covered by the West Witney development. Given delays that have occurred already and the questionable viability of the scheme, it is unlikely that the highway infrastructure will be delivered in accordance with the required timescale of 2016 – 2018 to align with the Council’s current housing trajectory.

6.13 It is further noted that a planning application was submitted in September 2016 (reference 16/03262/FUL) for common infrastructure, roads, landscaping and drainage in isolation to, and ahead of, the outline consent being issued. This application is also pending. However, the proposal is subject to an objection from Oxford County Council’s Major Planning and Transport teams on the grounds the application...
has come forward in advance of the outline planning permission for the strategic development which it would serve, and on the basis that the design is unsuitable for the required bus service provision. This implies likely further delays with delivering this site and must call into question whether the site can be “viably developed at the point envisaged” within the published housing trajectory.

6.14 East Witney - This site is identified within the draft Local Plan as a Strategic Development Area for residential development. The proposed modifications increase the allocation by 50, to 450 homes. The site comprises two parcels: a small area of land to the west of Stanton Harcourt Road, which will provide c. 30 dwellings, together with a larger area east of Stanton Harcourt Road, for a further 420 dwellings.

6.15 The Local Plan requires the East Witney SDA to facilitate provision of west facing slip roads at the Shore’s Green junction with the A40 east of Witney (A40/Shore’s Green Western Slip Roads). It is common ground between the promoters of the site, East Witney Land Consortium (EWLC), WODC and OCC that the East Witney SDA cannot be developed fully in absence of the Shore’s Green Slip Road improvements. However, the Joint Statement of Common Ground (SoCG) confirms that EWLC controls land sufficient only to deliver the Shore’s Green junction west-facing ‘off-slip’. It has no control over the full extent of land required to provide the west facing ‘on-slip (in accordance with Manual for Streets). While EWDC controls enough land to support an alternative (non-Manual for Streets) slip road design, this is not acceptable to OCC.

6.16 It is understood that negotiations are ongoing with the third parties that control the additional land, but at the time of writing there has been no conclusion of this matter. The potential to use compulsory purchase powers has also been mooted as an alternative approach. However, as noted in the Inspector’s Preliminary Findings:

“One of the owners of the additional land necessary for the slip road design required by the HA is promoting an additional/alternative housing site nearby and so may, understandably have little interest in facilitating the East Witney scheme by resolving the land ownership issue quickly. The Council has indicated a willingness to use a CPO to acquire needed 3rd party land, but a CPO should always be a last resort and is unlikely to be speedy process”.

6.17 It is pertinent to note that a previous Cogges Link Road scheme was abandoned in 2012 following an unsuccessful attempt to compulsory purchase land needed to construct the road.

6.18 The IDP (2016) identified the SGSR infrastructure as ‘Critical’ and to be delivered within a timescale 2016 – 2021 as a prerequisite of a development at East Witney. The cost of the infrastructure (2012) is estimated at £5.6 million with only £1.16 million currently held by existing S106 agreements. In similar fashion to the position at West Witney, the Council considers the highways infrastructure will be funded via Section 106 agreements. On this basis, once again, there is likely to be a significant burden placed on the site itself, extending in this case to in excess of £4.44 million (based on 2012 figures). Within the SoCG the EWLC states that the WODC and OCC requirement for the East Witney SDA to fund in full the cost of the SGSR infrastructure is not fairly and reasonably related in scale and kind to the development.

6.19 There are land ownership constraints affecting the delivery of the SGSR infrastructure; it is also not unreasonable to conclude, based on the content of the SoCG that there will be difficulties in determining where and to whom the costs of delivering the infrastructure are apportioned. As such, delivery of the infrastructure within the prescribed timescale of 2016 – 2021 is considered unrealistic. Furthermore, as yet, there are no named housebuilders involved with the site and no applications. The housing trajectory anticipates that the site will start to deliver housing in 2021.
6.20 Given the timeframes involved in preparing and determining planning applications, the absence of a named housebuilder; uncertainties applying to the required highway infrastructure, relating to funding and land ownership, it is considered unlikely that completions will be achieved by 2021.

6.21 North Witney – The proposed modification increases the allocation by 400 units, to 1,400 homes and increases the size of the site by incorporating land to the west of Hailey Road. The Local Plan requires the North Witney SDA to provide a new road link between Hailey Road and Woodstock Road via New Yatt Road (the Northern Distributor Road – NDR). The Local Plan also sets out that the North Witney SDA will facilitate the provision of a new road link between Woodford Way and West End, creating a second river crossing for Witney (the West End Link Road – WEL). It is common ground (SoCG) between the land promoter (NWLC), WODC and OCC that the North Witney SDA would be unacceptable without the WEL and the NDR (SoCG Traffic and Road Proposals, November 2015).38

6.22 The SoCG (Viability) identifies areas of disagreement in respect of the overall viability of the North Witney SDA and raises questions regarding funding of the required highway infrastructure: “WODC does not consider it reasonable for the landowner to expect the same return as other, less complex, greenfield sites elsewhere. However, WODC does accept that the substantial infrastructure costs associated with this SDA do have an impact on viability and will work with the NWLC to negotiate a satisfactory delivery mechanism which is financially sustainable”39.

6.23 Peter Brett Associates (PBA) has reviewed the highway infrastructure requirements relating to the North Witney SDA on behalf of Crest Nicholson. Their findings call into question the viability of delivering all of the infrastructure requirements. Furthermore, highway infrastructure is not the only significant infrastructure requirement associated with this SDA. The SoCG and Flood Risk Assessment (FRA) submitted by the developers describe large surface water attenuation basins that are needed to mitigate potential flood risks associated with the allocation. These will impose a further significant cost burden.

6.24 It is also important to note that sites of this scale and potential complexity take considerable time to deliver completions. A relevant piece of planning research by Nathaniel Lichfield and Partners40 (Appendix 6) highlights that for sites of between 3000 and 1,499 dwellings the average (based on the performance of 70 large sites nationally) is for a period of c. 5.5 years to elapse between allocation and first completions and for sites of this size to deliver on average around 100 completions per annum. On this basis, and allowing for some acceleration across these metrics, it is unlikely that first completions will be delivered before 2022; thereafter the site is likely to struggle to deliver the 1,000 dwellings originally planned. Adding in the doubts surrounding the funding and delivery of the major infrastructure works required to facilitate the development, there must be significant doubts concerning deliverability of the North Witney SDA within the plan period to 2031. The Council’s current housing trajectory anticipates first completions on site in 2021 with completion of the overall development in 203141. This is considered unrealistic.

6.25 An application relating to the part of the site seeking consent for 200 dwellings (reference 14/01671) was submitted in November 2014 and remains undetermined. The application is subject to technical objections from statutory consultees, including an objection from the highways authority regarding the impact of the development upon the existing highways network ahead of the delivery of the identified infrastructure requirements.

6.26 The potential for market saturation in the Witney area if all of the proposed allocations are delivered simultaneously is acknowledged at paragraph 9.2.48 of the Local Plan. The Council also anticipates delivery of
the bulk of the development at the North Witney SDA in the medium to long term to allow time for the East and West Witney schemes to come forward in advance of this. In considering the cumulative impact of the combined strategic developments around Witney, the landscape evidence states:

"Phasing of development at Witney is therefore particularly important to avoid the creation of further encirclement by extensive new estates with immature landscape settings".

6.27 Given the potential for substantial delays in delivering housing at West Witney; the issues impacting on delivery identified at East Witney, together with the significant infrastructure requirements required at both these sites, which have the potential to adversely affect delivery there must be doubts about the robustness of the Council’s strategy for comprehensively planned and phased development at Witney.

6.28 Therefore, to seek to accommodate the additional uplift in the overall housing requirement by, in part, allocating further significant housing growth to the North Witney and East Witney SDAs will not ensure that the strategy meets the objectively assessed development and infrastructure requirements within the plan period. Main Modification 91 therefore fails the tests of soundness insofar as the proposed modification is not positively prepared, nor is it effective and deliverable over the plan period.

6.29 The ‘Landscape and Visual Review of Submission for Carterton and Witney Strategic Development Options’ (October 2012) prepared by Kirkham Landscape Planning Ltd is the most up-to-date assessment of the landscape impact of developing land at the East Witney and North Witney SDAs.

6.30 With respect to East Witney, the Review makes recommendations on the limits of the extent of land which could be developed acceptably from a landscape perspective (one of the key determinants in the SA process applied to selecting allocations) and provided an estimated housing capacity of 250 – 300 units. The Review specifically considered a higher housing capacity on the basis of the site promoter’s submission, but concluded:

"It is recommended from a landscape perspective that the East Witney option could be pursued further, subject to major revisions to the extent of the development and to the layout, governed by protection of the key landscape assets of this area and a comprehensive Green Infrastructure masterplan prepared for the sites. The number of potential dwellings will however need to be reduced in order to protect important landscape, visual and townscape features of this area".

6.31 Notwithstanding this, the Council is now seeking to increase capacity of the East Witney SDA through increased density and expansion of the developable area to achieve delivery of 450 units. Policy WIT1, therefore, fails to secure a landscape led approach to masterplanning of the site, as set out in the evidence base.

6.32 With respect to North Witney, the developable area has been increased to incorporate a parcel of land west of Hailey Road. This area was not included within the site as part of the 2012 Landscape Review; accordingly there is no assessment on which to base its inclusion in the SDA. At the time of the Review, NWLC were promoting a development of 1,500 dwellings on a larger site extending further north compared to that now proposed by the Council within the Local Plan modifications. The Kirkham Review considered this site, commenting both on the extent of land that could be developed and providing guidance on housing capacity, which it set at 750 – 850 dwellings. In considering development of up to 1,500 dwellings it stated:

"It is recommended from a landscape perspective that if the North Witney option is pursued further, major
6.32 The number of potential dwellings will however need to be reduced significantly in order to protect important landscape, visual and townscape features of the area. 46 6.33 Within the SoCG relating to site capacity, it is clear that NWLC is promoting a larger allocation (c. 50 hectares), which includes a net residential area of c. 32 hectares. NWLC consider this could accommodate up to 1,400 dwellings at an average density of around 43 dwellings per hectare (dph). This area extends further north than the developable area currently proposed within the Local Plan.

6.34 Within this SoCG WODC state:

"whilst this quantum of development is achievable within the extent of development land identified by the NWLC, it (considers that it) would represent a very high density of development". 48

6.35 The proposed modifications increase the number of dwellings within the allocation from 1,000 to 1,400, and while the allocation area has increased, by incorporating the parcel of land west of Hailey Road, overall the proposed developable area is smaller than that promoted by NWLC. Accordingly the average density across the site would be greater than the 43 dph countenanced by the NWLC proposals and considered to be very high by the Council. In conflict with the Council’s own evidence base Policy WIT2 fails to secure a landscape-led approach to masterplanning the site.

6.36 The Council has failed to provide any landscape evidence to justify the uplift in planned development either at the East Witney or the North Witney SDAs and therefore the increased quantum of development at each of these sites is in unsound on the basis it does not accord with the evidence base.

3) Heritage impact

6.37 Paragraph 9.2.25 of the Local Plan highlights key issues and challenges facing Witney, which include conservation and enhancement of the historic environment. The Witney sub-area contains many heritage assets including Conservation Areas, Scheduled Monuments and a wide range of Listed Buildings. As set out elsewhere in these representations paragraph 132 of the NPPF requires local planning authorities to take account of the impact of development on the significance of designated heritage assets, affording great weight to the conservation of such assets. Paragraph 141 also requires LPAs to make information about the significance of the historic environment gathered as part of the plan-making process publicly accessible.

6.38 As part of his requirement for Statements of Common Ground (SoCG) in August 2015, the Inspector requested details of assessments made on the effect of development upon the significance of heritage assets adjoining the North Witney SDA. The Heritage Assets SoCG50 advised that NWLC had commissioned a heritage assessment of the North Witney SDA, and the Council commented on the findings of the assessment within it, cross-referring to the Council landscape evidence base51. However, the Council provide no details of their own heritage assessment of the North Witney SDA because there is no such publicly available document within the Local Plan evidence base.

6.39 Notwithstanding national policy and the provisions of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Plan modifications have been prepared in absence of any proper assessment of the historic environment, or of the potential impact of development allocations on identified heritage assets. In absence of such evidence, the Council is unable to conclude with any confidence that the increased housing allocations at the East Witney and North Witney SDAs would avoid causing harm to
designated heritage assets. In absence of such an assessment it is not possible to conclude that the proposed allocations are sound. The evidence base is deficient in this regard and therefore the allocations cannot be relied upon.

6.40 Accordingly, the Local Plan should be modified to remove the uplift in housing allocated to the East and North Witney SDAs, which are affected by deliverability and viability challenges and for which there is a lack of sound evidence relating to the impact on the historic environment.

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### Table 9.1 (Main 91) sets out the anticipated housing delivery in the Witney sub-area over the plan period. The WOLP does not allocate all of the planned growth within the sub-areas and relies on windfall developments to deliver the objectively assessed housing need over the plan period. In the Witney sub-area, anticipated windfall developments of up to 304 dwellings will be required over the plan period based on historic rates of windfall delivery within the sub-area.

The WOLP as a whole, and to some extent the Witney sub-area, rely heavily on windfall development to deliver the objectively assessed housing need. Incremental development will not bring forward the required contributions to fund key items of infrastructure such as SGSR to the A40, schools and other infrastructure.

This modification is supported as it clarifies that the options considered land north and east of Witney are considered to be the most suitable and it reflects the increase in housing numbers at each to 1,400 and 450 homes respectively. The Consortium has previously submitted representations and a Development Framework Document detailing how their site can yield up to 1,400 dwellings in an appropriate manner.

WODC continues to position WEL as the second river crossing for Witney, when OCC’s LTP4 determines that the Shores Green junction upgrade becomes the second river crossing (OCC LTP4 WIT1), with WEL not even...
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6.41 Paragraph 9.2.34, which relates to the East Witney allocation (450 homes) states:

"The site has no significant environmental or heritage constraints and provided the extent, scale and design of development is sensitively controlled, will not have a significant landscape impact".

6.42 This statement is considered to be unjustified on the basis there is no evidence against which to judge the veracity of the claim. As set out elsewhere within these representations in absence of a heritage assessment dealing with the heritage assets within and in close proximity to the site it is not possible to conclude that there are no significant constraints that are capable of being overcome satisfactorily for this quantum of development. Reference is made within the draft policy (WIT1) to the requirement to secure the conservation and enhancement (where possible) of the setting of the Cogges Scheduled Ancient Monument and the Witney and Cogges Conservation Area and to ensure that investigation, recording and safeguarding of the known potential archaeological significance of the area is carried out. In absence of any assessment of these assets it is not possible to conclude that the policy criteria can be met for the allocation that is proposed.

6.43 Similarly, the Kirkham Landscape Review (2012)52 does not support the statement that an allocation of 450 units will not have a significant landscape impact.

6.44 The wording of 9.2.34 has been changed from requiring the development to deliver west facing slip roads at the Shores Green junction onto the A40 to:

"the west facing slip roads at the Shores Green junction onto the A40 will need to be delivered alongside the development in order to help manage the impact of the development". (GL Hearn emphasis).

6.45 Paragraph 9.2.34a further states:

"The development itself is able to deliver the 'off-slip' through a planning obligation and an appropriate financial contribution will be sought towards the 'on-slip' potentially as part of a wider strategic transport infrastructure fund/package for Witney".

6.46 It is a policy requirement under criterion b) of Policy WIT1 for the development of the SDA to be phased in accordance with the timing of provision of infrastructure including the Shore Green junction with the A40.
6.47 It is common ground between the promoters of the site, East Witney Land Consortium (EWLC), WODC and OCC that the East Witney SDA cannot be developed fully in absence of the Shore’s Green Slip Road improvements. The SoCG confirms that EWLC controls land that is sufficient only to provide the Shore’s Green junction west-facing ‘off-slip’. It does not control the land required to provide the west facing ‘on-slip’, for a scheme designed in accordance with Manual for Streets. It is understood that negotiations are ongoing with the landowners who control the required land and the potential use of compulsory purchase powers has been suggested as another solution. However, as noted in the Inspector’s Preliminary Findings the owners of the additional land are promoting an alternative site nearby and so may have little interest in resolving the matter quickly.

6.48 If third party land outside the control of either the developer or the Council is required to deliver infrastructure necessary for implementation of the strategic allocation, and delivery of this land cannot be guaranteed then there is a significant risk that the policy cannot be implemented. Under such circumstances, the policy cannot be construed to be effective and as such must be considered unsound as drafted.

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<td>1777</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 93</td>
<td>Much of the revised explanatory text to Policy WIT 1 is supported by the EWLC. We would agree that there are no significant environmental or heritage constraints, and that the land is well located in relation to the Town Centre. We support the proposed approach to delivery of the Shores Green Slip Roads, with the East Witney development delivering the off-slip alongside planned housing development, and an appropriate financial contribution being made to enable the Highway Authority to deliver the on-slip. As set out below in more detail, we do not believe that landscape considerations should constrain the scale of housing development at East Witney to about 450 dwellings, when the full range of social, environmental and economic considerations are taken into account, including the significant locational advantages of the land at East Witney, and the comparable landscape and visual impacts of other proposed allocations in the District.</td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td></td>
<td>2240</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 93</td>
<td>The development [East Witney] itself is able to deliver the ‘off-slip’ through a planning obligation and an appropriate financial contribution will be sought towards the ‘on-slip’ potentially as part of a wider strategic transport infrastructure fund/package for Witney.</td>
</tr>
<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td></td>
<td>798</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 93</td>
<td>MAIN 93 Paragraphs 9.2.34 – 9.2.34a East of Witney SDA (450 dwellings) Stagecoach supports the modification in support of an increased quantum as part of the East of Witney SDA. Stagecoach has made previous representations in support of such an increased allocation in line with the fact this is among the best locations in the District as far as sustainable transport choices is concerned.</td>
</tr>
<tr>
<td>MM388</td>
<td>Ainscough Strategic Land</td>
<td>Ainscough Strategic Land</td>
<td>-</td>
<td>Ainscough Strategic Land</td>
<td>882</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>Witney Sub-area 4.24 Transport is a key issue for the Witney sub-area which contains a number of important and well-used routes including the A40 the A4095 and A415. Although Witney has the best road connections and bus</td>
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</table>
services in the district context, traffic congestion is a significant problem due to high car use particularly for journeys outside of Witney.16

4.25 Currently access to the A40 at Witney is relatively limited and the route is also heavily congested at peak times between Eynsham and the edge of Oxford.

4.26 An award of £35m through the Local Growth Fund will be used to deliver improvements comprising a new park and ride at Eynsham and an eastbound bus lane from the park and ride toward Oxford. Longer-term improvements to the A40 have also been identified although funding is yet to be secured, and is largely dependent on the delivery of the Garden Village SDA.

4.27 Such issues could clearly slow down delivery on the SDAs in Witney.

East Witney SDA (MM93)

4.28 Capacity: The Submission Draft Plan identified 400 homes at East Witney SDA, split across two separate sites:

* Land off Stanton Court Road (30 homes) and
* Cogges Triangle (c 370).

4.29 The Proposed Modifications increases the allocation of to 450 homes:

* Land off Stanton Court Road is maintained at 30 homes; and
* Cogges Triangle is increased to c 420 homes.

4.30 We do not take issue with these capacity figures. The boundary of Cogges Triangle has not been altered to accommodate the additional 50 homes within the East Witney SDA but the developable area has increased. This is in response to EWLC assertion that an extended development area could accommodate up to 475 homes.18

4.31 Ownership: The East Witney Land Consortium (EWLC) is a family consortium who own all the land within the SDA. EWLC have actively promoted an increase in the residential capacity of the East Witney SDA. The EWLC will manage the delivery of the site, but as yet there is no named developer on board.

4.32 Infrastructure Requirements: The delivery of Cogges Triangle is dependent on the delivery of Shores Green slip roads.

4.33 Delivery: We have assumed that 30 homes can be brought forward on the Stanton Court Road site with relative ease. This parcel is not dependent on the delivery of the Shores Green slip roads and we note the inclusion of the Stanton Court Road site within the allocation is to assist in providing early revenue for the developer to help fund the infrastructure needed to bring forward the larger Cogges Triangle site.19 In terms of funding mechanism, we don't take issue with this.

4.34 Indeed, the development of Cogges Triangle is able to deliver the Shores Green ‘off-slip’ through a planning obligation since the land required is within the ownership of EWLC. However, it is noted by the site promoters and the Council that the delivery of the Shores Green ‘on slip’ may require the use of CPO powers if necessary.20 Furthermore, the ‘on slip’ works would need to be secured through an appropriate financial contribution that will be sought potentially as part of the wider strategic transport infrastructure...
4.35 The above factors will no doubt effect the lead-in time to the first completions at the East Witney SDA. Indeed, it is noteworthy that the Council's Housing Land Supply Position Statement (October 2016) excludes the whole of the East Witney SDA (including the 30 homes of the Stanton Court site) from the Council's 5-year supply assumptions.

4.36 Conclusion: Notwithstanding some of the above complexities with the site's delivery, we have assumed the 450 dwellings proposed would be delivered within the plan period based on an average of 60 dwellings per annum and commencement around 2021 for the 30 unit scheme and 2024 for the larger site.

6.49 Figure 9.3 details an increased area for proposed housing development to accommodate the increased number of units allocated to the East Witney SDA. This does not accord with the evidence set out within the Kirkham Review55, which provides the most up-to-date assessment of the landscape impact of developing land at the East Witney SDA. 6.50 With respect to East Witney, the Review makes recommendations on the extent of land that could be developed without adversely impacting on the landscape and provides an estimated capacity of 250 – 300 dwellings. The Review considered and rejected a larger quantum of housing: "It is recommended from a landscape perspective that the East Witney option could be pursued further, subject to major revisions to the extent of the development and to the layout, governed by protection of the key landscape assets of this area and a comprehensive Green Infrastructure masterplan (being) prepared for the sites. The number of potential dwellings will however need to be reduced in order to protect important landscape, visual and townscape features of this area".56

6.51 Notwithstanding the above, the Council is proposing via the modifications to increase capacity at the East Witney SDA by raising the density of development and by expanding the developable area. The proposed allocation is now set at 450 dwellings; up from 400. Taking into consideration the factors set out above Policy WIT1 is considered to be unsound on the basis the Council has failed to provide any landscape evidence to justify the increase in development at the East Witney SDA, which should consider a landscape-led approach to masterplanning of the site, based on the evidence.

Historic England welcomes and supports Proposed Main Modification MAIN95 for the recognition of heritage impact as an issue on which the precise quantum of development will depend, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework.

Stagecoach supports the modification in support of an increased quantum as part of the East of Witney SDA. Stagecoach has made previous representations in support of such an increased allocation in line with the fact this is among the best locations in the District as far as sustainable transport choices is concerned.
Historic England welcomes and supports Proposed Main Modification MAIN96 for the addition of criteria relating to the Cogges Scheduled Monument and the Witney and Cogges Conservation Area; to the investigation, recording and safeguarding of the archaeological significance of the area; and to the results of that investigation informing the final layout of the development, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework.

As set out in our representations to the first draft of the Local Plan, the Council should undertake a playing pitch strategy to assess the need for outdoor sports provision to meet the needs of the new housing development proposed in the District. This policy proposes a significant amount of new housing and an up-to-date evidence base for indoor and outdoor sports provision is required to support this. Please contact Sport England for assistance.

Main 96

6.52 It is common ground between the promoters of the site, East Witney Land Consortium (EWLC), WODC and OCC that the East Witney SDA cannot be developed fully in absence of the Shore’s Green Slip Road improvements57. The SoCG confirms that EWLC controls land that is sufficient only to provide the Shore’s Green junction west-facing ‘off-slip’. It does not control the land required to provide the west facing ‘on-slip’, for a scheme designed in accordance with Manual for Streets. It is understood that negotiations are ongoing with the landowners who control the required land and the potential use of compulsory purchase powers has been suggested as another solution. However, as noted in the Inspector’s Preliminary Findings58 the owners of the additional land are promoting an alternative site nearby and so may have little interest in resolving the matter quickly.

6.53 If third party land outside the control of either the developer or the Council is required to deliver infrastructure necessary for implementation of the strategic allocation, and delivery of this land cannot be guaranteed then there is a significant risk that the policy cannot be implemented. Under such circumstances the policy cannot be construed to be effective and as such must be considered unsound as drafted.

Main 97

6.54 Paragraph 9.2.38, which relates to the North Witney allocation (1,400 homes) states that the site: “has no major ecological or heritage constraints and, based on the proposed quantum of growth, will not have a significant landscape impact”.

6.55 This statement is considered to be unjustified on the basis there is no evidence against which to judge the veracity of the claim. As set out elsewhere within these representations in absence of a heritage assessment dealing with the heritage assets within and in close proximity to the site it is not possible to conclude that there are no significant constraints that are capable of being overcome satisfactorily for this quantum of development. Reference is made within the draft policy (WIT2) to the requirement to secure the conservation and enhancement (where possible) of the setting of the Grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas and to ensure that investigation, recording and safeguarding of the known potential archaeological significance of the area is carried out. In
absence of any assessment of these assets it is not possible to conclude that the policy criteria can be met for the allocation that is proposed.

6.56 Similarly, the Kirkham Landscape Review (2012)59 does not support the statement that an allocation of 1,400 units will not have a significant landscape impact.

The EWLC supports Main Modification 96, which proposes an increase to the allocation at East Witney from about 400 to about 450 homes. However, we believe that there is scope to further increase the scale of new development planned at East Witney. It is considered particularly important that any proposed development is brought forward in the context of comprehensive master plan - that recognises both the existing need for additional development land to ensure Local Plan flexibility and deliverability, as well as the fact that the need for more housing will not come to an end in 2031.

The EWLC has been working with the Environment Agency to explore the potential for further dwellings at Land off Stanton Harcourt Road. We believe that, if the development area is ‘rounded off’, at least 50 units could be delivered in Flood Zone 1, the area at lowest risk of flooding. There is also potential for further dwellings to be developed on this land, if ground raising takes place on part of the site, and other areas are used to attenuate flood water. This approach is being explored with the Environment Agency, but could increase the capacity of the site still further, to up to 100 units.

As above, the EWLC supports the addition to Policy WIT 1, which requires that comprehensive development is led by an agreed master plan. The EWLC will work with a leading development Master planner to prepare a comprehensive master plan for the site, which will focus on delivering an exemplar scheme, of exceptional design and appropriate to its setting. Alongside new housing development, the scheme will deliver open space, green infrastructure, and cycling and footpaths connecting the development to the Cogges Estate and Witney town centre.

The EWLC welcomes the removal of the requirement that the Shores Green Slip Roads must be delivered prior to completion of any housing on the Cogges Triangle part of the site. Work undertaken on behalf of the EWLC demonstrates that with the Shores Green off-slip in place (which can be delivered in on EWLC and
Parking Authority land) development at East Witney could be delivered in full, without a prior requirement for delivery of the on-slip. This is not to say that the EWLC is not prepared to make an appropriate financial contribution towards the on-slip, but its delivery is not needed in advance of significant development at East Witney.

EWLC accepts the proposed modification to Policy WIT 1 which requires further consideration of the local heritage assets. An archaeological assessment of the site will be undertaken, to confirm the presence or absence of heritage assets on the site. This will inform the final layout of the development, and relevant finds will be deposited in a public archive.

The Proposed Main Modifications (Main 24 - Policy H1) to the WOLP includes an increase in the apportionment of dwellings to the Witney sub-area from 3,700 to 4,400 dwellings. My client is supportive of the spatial strategy to increase the number of dwellings to be delivered at Witney as it’s the most sustainable settlement in the District. However, the increase in apportionment is delivered through an increase in the strategic allocations at Witney (Main 26 and 27) at the following SDA’s:

- Land to the east of Witney - increase from 400 to 450 homes
- Land to the north of Witney - increase from 1,000 to 1,400 homes

The Inspector’s Preliminary Findings Part 2, paragraphs 2.3 to 2.6, discussed deliverability concerns regarding the strategic allocation at Land East of Witney, primarily due to concerns with the deliverability of the Shore Green Slip Roads (SGSR) and the acceptance that the strategic site allocation cannot be built without it (paragraph 2.4). The landowner in relation to the strategic allocation at Land East of Witney does not own all the land needed to deliver the SGSR to the design required by Oxfordshire County Council (Highways Authority).

Oxfordshire County Council Local Transport Plan 2015-2031 (LTP), Witney Area Strategy, advises at page 77, the A40 is the main strategic route through West Oxfordshire, however there is limited access to the A40 at Witney. Furthermore, ‘to the east of Witney the B4022 Shores Green A40 junction provides east facing slip roads only for trips to and from Oxford. This restricted movement junction, coupled with Bridge Street providing the only river crossing which links central and east Witney, results in considerable congestion and journey time delay. Housing and employment growth at Witney will place increasing demand on the existing junctions with the A40.’

The LTP goes onto to provide strategic transport network upgrades to deliver the strategic growth planned for Witney.

‘West-facing slip roads at A40 Shores Green junction and improvements to the B4022 Oxford Hill junction with Jubilee Way and Cogges Hill Road to be delivered by housing development at East Witney. This will provide an all-movement junction east of Witney, and a second river crossing for local journeys. Complementary measures in the surrounding rural area may also be sought to support this scheme.’
It is clear the Highways Authority see the deliverability of west facing slip roads at Shore Green junction are needed to provide a second river crossing for local journeys, this is fundamental to the deliverability of the East Witney SDA, other existing and proposed allocations and to the wider spatial strategy for the Witney sub-area.

Policy T2 (Highway Infrastructure Schemes) of the WOLP supports the important strategic highways improvements to SGSR and indicates it will be safeguarded and delivered as part of the committed and allocated urban extensions and new Garden Village identified in this Local Plan. The supporting text to Policy T2 indicates the highways upgrades for SGSR will be delivered through Policy WIT1 (Main 61, para 7.32).

The supporting text to Policy WIT1 (East Witney Strategic Development Area) (Main 93, para 9.2.34 and 9.2.34a) indicates west facing slip roads will be delivered alongside the development to help manage the impact of the development. Furthermore, it states financial contributions have been secured from another housing development and the East Witney SDA ‘will be able to deliver the ‘off-slip’ through a planning obligation and a financial contribution will be sought towards the ‘on-slip’ potentially as part of a wider strategic transport infrastructure fund/package for Witney.’

Part b) to Policy WIT1 (Main 96) has been amended to the following:

‘Development to be phased in accordance with the timing of provision of supporting infrastructure and facilities including the necessary improvements to Shores Green junction onto the A40 and related highways measures.’

The main modifications have weakened the policy wording, the fundamental change being the deletion of wording for SGSR to be delivered via East Witney SDA, now it merely is to be delivered in accordance with timing of the provision of the infrastructure. However, there is no mechanism for the delivery of SGSR besides a financial contribution towards its delivery. The delivery of west facing slip roads is fundamental to the deliverability of the East Witney SDA, and the wider spatial strategy for Witney given the strategic importance of the A40 and the benefit a second river crossing will provide.

Policy WIT1 fails to provide any certainty that the SGSR will and can be delivered. This is fundamentally the same concerns raised at paragraphs 2.3 to 2.6 of the Inspector’s Preliminary Findings Part 2.

During Hearing sessions (held between Monday 23 November and Thursday 26 November 2015), the Council indicated their willingness to use a Compulsory Purchase Order (CPO) to acquire 3rd party land. However, we are aware there is no such willingness from the Highways Authority to use CPO powers to deliver SGSR. The use of a CPO is a lengthy legal process and should only be considered as a last resort where it is in the public interest. Furthermore, the use of a CPO should be considered against other reasonable alternatives for the delivery of SGSR. As noted at paragraph 7.30 of the WOLP, a previous scheme known as the Cogges Link Road which would have provided a second river crossing was abandoned following a failed CPO attempt. Fundamentally, a CPO of 3rd party land is no guarantee of the delivery of SGSR, therefore when assessed against other reasonable alternatives, the strategy to utilise a CPO cannot realistically be considered the most appropriate strategy when assessed against the reasonable alternatives.

Policy WIT1 is not positively prepared, justified or effective in delivering SGSR infrastructure which is fundamentally required to support the East Witney SDA and the wider Witney spatial strategy. The soundness of Policy WIT1 and the Witney spatial strategy is crucial to the soundness of the WOLP as a whole given the Council’s increased reliance on the North and East Witney SDA’s to deliver the objectively assessed housing
need and for the Local Authority to deliver a 5 year supply of land for housing.

Ecology and Natural Environment
In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being.

Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

East Witney
There is potential for increased recreational pressures on Witney Lake to the south which is known to have particularly high water quality and biodiversity value. This and the wider Windrush in Witney area - Langel Common, Grimes Mead, Cogges - would benefit from further investment in green infrastructure if development is to proceed.

The site lies adjacent to the Lower Windrush Valley Project area and consideration should be given to how best to support the long-term strategic aims of the LWVP.

The Lower Windrush Conservation Target area appears to be missing from the map.

Green infrastructure developments alongside the A40 and other main roads would provide additional benefits e.g. in reducing noise and air pollution impacts.

(i) comprehensive development to be led by an agreed masterplan.

(c) the provision of other supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development, and incorporating a comprehensive network for pedestrians, cyclists and public transport with links to adjoining areas, including a particular emphasis on improving the linkages across the Windrush Valley into the town centre consistent with the aims and objectives of the Windrush in Witney Project.

East of Witney SDA (450 dwellings); Cogges Triangle (420 dwellings)
Stagecoach has already expressed its support for development East of Witney, a site that directly benefits from being directly served by the main bus corridor between Carterton, Witney and Oxford. We have previously made representations in support of the allocation of further development here, given this unique locational advantage.

This SDA and the two main areas of development comprising it, will assume much of the funding burden for the Shores Green Slip Roads, which we recognise is also essential to allow the development to here and on
### Respondent Details

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<tr>
<th>Respondent ID</th>
<th>Respondent Organisation</th>
<th>Respondent Name</th>
<th>Respondent Title</th>
<th>Respondent Surname</th>
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<th>Comment</th>
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<tbody>
<tr>
<td>MM416</td>
<td>Witney Town Council</td>
<td>Witney Town Council</td>
<td>Mrs</td>
<td>Groth</td>
<td>920</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 96</td>
<td>The Town Council would like land to be reserved in Witney East to provide a new access from the A40 (between Shores Green and Barnard Gate) linking to Jubilee Way. The Town Council continues to remain concerned about the flooding impact along the Windrush Valley and requests sustainable flood prevention measures are put in place prior to development commencing.</td>
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| MM457         | North Witney Action Group NWAG | North Witney Action Group (NWAG) | Mr | Neyroud | 1335 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 97 | Atkins Technical Note, Evaluation of Traffic Impacts, 4.2, Table 13 says - "West End Link 2 (WEL2) - standard junctions - West End to Mill Street link road/bridge"
This reference to the use of ‘standard junctions’ (and thereby excluding Higher Capacity Junctions) does not appear to be mentioned anywhere else in any of the latest submitted evidence, including ‘Main Modifications’. Given that WODC TRA1 contains up to 50% of text and data comparing ‘Higher Capacity Junctions’ (HCJs) with ‘standard junctions’, NWAG is confused as to whether WODC has now permanently abandoned the idea of using HCJs at each end of WEL, or whether they have been temporarily excluded from the Evaluation of Traffic Impacts report for some other ungiven reason(s). This is of critical importance because, as pointed out by WODC in TRA1, using HCJs has a significant impact on traffic around the WEL area, and therefore would be expected to have a direct bearing on the outcome of tables 8 and 9 in the Evaluation of Traffic Impacts report. A Freedom of Information Request was submitted by NWAG to OCC on November 17th 2016. It requested a copy of the raw data used to produce the traffic flow in the Evaluation Report in order to establish the situation within Witney around the WEL area. The response (11030 EIR - Traffic Flow Figures) received from OCC dated December 14th 2016 was - “The report/work so far has not included outputting the raw data from the traffic model, which would incur a significant fee to extract.” This is an extremely unhelpful response in a situation where NWAG are attempting to analyse data presented in a macrocosmic format, where multiple options have been added, dropped and altered and where close analysis of the raw data has previously revealed a quite different outcome than the technical reports would indicate. Furthermore, it is beginning to become apparent that the important decisions being made on critical issues (eg infrastructure, sequencing and timing) are being relaxed by WODC, in order to accommodate the flawed North Witney SDA. |
| MM784         | North Witney Land Consortium | North Witney Land Consortium | North Witney Land | - | 2165 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | Quantum of development and expansion of allocation site
This proposed main modification is supported to reflect the proposed increase in housing numbers at the North Witney SDA from 1,000 to 1,400 homes and to provide clarification in relation to the delivery of the other sites allocated in the town, to proceed without causing unacceptable highways impacts. |
Our previous submissions have indicated that the North Witney SDA could deliver 1,400 homes without the additional land to the west of Hailey Road.

The draft wording of Policy WIT2 states however that the allocation is for "about 1,400 homes", which infers that the Council will take a flexible approach if the site could satisfactorily accommodate a higher number of units. This would help to address the concerns raised above regarding the ability of the Plan as currently drafted to meet the housing requirement for the Sub-Area and the District as a whole.

On that basis no objection is raised to these proposed main modifications in terms of the principle of including the additional land to the west of Hailey Road within the boundary of the North Witney SDA. Indeed, the potential opportunity to expand the Witney Community Primary School rather than provide a separate new school within the main site area is supported by our clients.

Revised paragraph 9.2.45 of the Local Plan explains the Council's justification for increasing the quantum of development on the site and the landscape work that has been undertaken to inform this. We support the acknowledgement that the site is capable of accommodating a greater number of houses than that previously suggested within the 'Kirkham Associates Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options' (2012).

An independent landscape review of the site and the Kirkham report previously prepared for the North Witney Consortium (and previously submitted to the council) concluded that the Kirkham report had concentrated on the wider open countryside to the north of Witney. Although we would not disagree with the high sensitivity landscape of the wider setting, it is considered that the openly visible existing settlement edge exerts an urbanising influence into a greater portion of the site than the Kirkham report suggests. The openness of the site contrasts strongly with the high level of enclosure to the north beyond the site, in the vicinity of Poffley End and Hailey, ensuring the setting to these settlements would not be compromised by development of the site.

Through sensitive masterplan design it is therefore considered that a development of around 1,400 units can be readily assimilated into the landscape without eroding the setting to Poffley End or Hailey. To that end, and as indicated at paragraph 9.2.45 of the draft Local Plan, a detailed Landscape and Visual Impact Assessment (LVIA) would be submitted in support of any future planning application, to ensure that the scale of the development proposed and its arrangement is capable of being accommodated on the site without undue adverse impact.

Given the points raised above in respect of the Council's position on the findings of the Kirkham report referred to at footnote 56 of the Plan, and given the Council's acceptance of the findings of the Environmental Dimension Partnership Report (EP247_10b) prepared on behalf of the Consortium, it is considered that this document should also be referred to in the footnotes. This modification will provide clarity in respect of the Council's altered approach to the site.

In light of the Council's comments in respect of landscape and the recognition that the SDA is capable of accommodating an increased quantum of development, it is considered that the revised Figure 9.8 at Main 98 should be updated. As with the other allocations in the Plan it is recommended that the Figure is simplified to
<table>
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<td>Indicate the site boundary only with all other matters of detail to be agreed through the planning application process in due course (for example, removing the areas identified in the Legend).</td>
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<td>Phasing and Masterplanning</td>
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<td>Main Modification 102 in respect of phasing is broadly supported in so far as it provides additional flexibility in relation to the phasing of development at North Witney.</td>
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<td>Paragraph 9.2.48 states that:</td>
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<td>&quot;As a large site, development of the North Witney SDA is likely to fall into a number of phases. There is already a current planning application on part of the site for 200 dwellings which is likely to form 'Phase 1' (subject to a comprehensive masterplan/delivery framework for the whole site)...&quot;</td>
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<td>The potential for the land between New Yatt Road and Woodstock Road (to which the extract above refers) coming forward in the short term as a first phase of development of the North Witney SDA is recognised and supported. The site, which is controlled by Taylor Wimpey, lends itself to early release without prejudice to the remainder of the site.</td>
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<td>As well as land at Woodstock Road, Taylor Wimpey also control a substantial area of the main SDA site. Taylor Wimpey fully agree that any development on land between New Yatt Road and Woodstock Road should make proportionate contributions towards delivering the infrastructure requirements of the whole SDA, in addition to providing the first phase of the Northern Distributor Road. Taylor Wimpey is completely committed to ensuring that this early phase of development forms part of the wider SDA and does not prejudice its delivery, which can be secured through the use of planning conditions and s106 obligations as necessary.</td>
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<td>Given the potential for the New Yatt Road/ Woodstock Road to come forward at an earlier stage and that the proposed new additional land to the West of Hailey Road is not within the control of the Consortium, the requirement for a “comprehensive masterplan” for the whole site is questioned. We therefore suggest that the reference to a “comprehensive masterplan” is removed from paragraph 9.2.48 and just the reference to a “delivery framework” retained in the interests of clarity.</td>
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<td>The Council has proposed an additional criterion (a) “comprehensive development to be led by an agreed masterplan” to reflect the comments in the supporting text discussed above. Whilst a masterplan for the main part of the site is supported, given the comments above it is suggested that this criterion should be amended to: “comprehensive development of the main part of the site between New Yatt Road and Hailey Road to be led by an agreed masterplan” (additional text underlined).</td>
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<td>The Council have proposed a new criterion which requires “the conservation and where possible enhancement of the setting of the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas.” Given our comments above in respect of Policy EH7 it is considered that further amendment is required to this proposed requirement to ensure it is consistent with national policy.</td>
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<td>Detailed heritage assessments have been undertaken on behalf of the Consortium in respect of heritage and...</td>
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these will inform, and assess, the detailed proposals as they continue to evolve.

**Criterion L - West End Link**

As with our above comments in respect of criterion Di, it is considered that this requirement should be reworded to reflect the requirements of the NPPF in respect of heritage. Furthermore, to ensure consistency with MAIN 61 discussed above, the Policy text should reflect that the North Witney SDA is to “facilitate the delivery of the West End Link.”

**Other Matters**

We support the recognition of the potential of land to the north of the site in terms of the potential use of off-site measures in relation to sustainable drainage for the North Witney SDA.

As highlighted in the Development Framework Document (DFD) previously submitted, as well as mitigating the impact of the proposed development, the use of additional off-site attenuation features offers the opportunity to alleviate the downstream sewer systems which are currently over capacity.

The proposed main modifications to criteria (a), (b) and (i) to Policy WIT2 relating to the North Witney SDA are supported in principle to reflect the additional capacity of the site and possibility of off-site drainage solutions, as well as providing additional flexibility in relation to the proposed phasing of development.

For the reasons detailed above in respect of MAIN 40 (not repeated here), we also maintain a strong objection to criterion (n), which requires the developer to set aside 5% of the developable plots as custom/self-build, and request that this be deleted.

**Sustainability Appraisal**

Enfusion, on behalf of WODC, have prepared a Sustainability Appraisal Addendum Report in respect of the proposed modifications to the Local Plan. In respect of the increased scale and quantum of development proposed at the North Witney SDA, the Addendum advises that “the findings of the SA as reported in the Submission SA Report remain valid.”

We support the conclusions of the Sustainability Appraisal Addendum Report. Given the scale of increase of the proposed SDA since the previous Sustainability Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments above.

**Viability Assessment and Infrastructure Delivery Plan**

To underpin the proposed modifications to the Local Plan, Aspinall Verdi have prepared a Strategic Development Area Viability Update (2016) on behalf of the Council. The Viability Update should be further updated to reflect our comments above in respect of custom/selfbuild housing etc.

As per the previous submissions on behalf of the Consortium, further consideration is required in respect of the necessary infrastructure required to be delivered by the site and whether this is to be funded by the SDA in isolation or whether contributions through Section 106 Agreements or CIL are to be sought from other...
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<tr>
<td>MM2</td>
<td>Jon Ray</td>
<td>Mr Ray</td>
<td>3</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 97</td>
<td>The transport dependencies should be made much more explicit. Too often we see development without the corresponding infrastructure changes - permission for these dwellings should not be granted until appropriate infrastructure change is in place.</td>
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Dr Small</td>
<td>807</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 97</td>
<td>MAIN 97 Paragraphs 9.2.37 – 9.2.38 North of Witney Strategic Development Area However Stagecoach notes and objects to the identification of 400 additional dwellings North of Witney. Stagecoach does not believe that the evidence sufficiently demonstrates that this site as a whole is sustainable, suitable, achievable or deliverable, as required by NPPF. Stagecoach has already pointed out to the Examination that land north of Witney becomes progressively harder to integrate into a relevant and attractive pattern of bus service provision, the further west from New Yatt Road development extends. Thus land extending to Hailey Road, and now beyond it will be that much more likely to be car-dependent, even if that is only to drive out of town to the new Park and Ride site at Eynsham, Hanborough Station, or a new P+R proposed in the Oxford Transport Strategy in the Begbroke/A44 area. This proposals therefore runs entirely contrary to the requirement in NPPF para 17 that patterns of development should be actively managed to make the fullest possible use of the opportunities for sustainable transport. On the contrary, this site would struggle to be served by any kind of bus service that would be relevant to meeting residents daily travel needs to a meaningful degree. Worse, modelling already before the Examination shows that even with the £18m West End Link Road provided, the 1000 dwellings previously proposed could be accommodated with small detriment to already unacceptable traffic conditions at Bridge Street. It follows therefore, that any additional quantum provided here would seriously affect this area, adding greatly to congestion-induced delay and unreliability on all our bus services serving the District. NPPF paragraph 32 makes clear that when cumulative unmitigated impacts are severe, development should not be consented. There is no evidence of any kind presented, that an additional 400 dwellings in this location could be accommodated, without already severe and chronic congestion being the result, even if the WELR is provided, something which is itself in some doubt. This aspect of the Plan is contrary to NPPF paras 17 and 29-35, and is evidently not the most appropriate solution when all reasonable alternatives have been considered contrary to paragraph 182. Accordingly, this aspect of the Plan is unsound. Irrespective of the planning merits of the enlarged site, it is also unclear that the enlarged site North of Witney is even deliverable. We are apprised that the land is unregistered and has no promoter, much less a housebuilder, on board. Given the fact that WODC repeatedly stressed the challenge of meeting the currently-proposed housing trajectory, this is both illogical and unhelpful. The Plan in this respect is ineffective, and is thus also unsound on that basis. Stagecoach therefore strongly urges WODC to re-examine the potential to accommodate development north of the town, to focus on a smaller quantum oriented towards the Woodstock Road, where much improved developments in the area. We will continue to liaise with the Council in this regard in advance of the EIP.</td>
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bus services could be provided; and that any residual quantum be redirected to other sustainable settlements.

This could include Carterton, where at least two housebuilders with a strong track record are actively promoting strategic options that are omitted from the Plan.

**Main 97 North Witney Strategic Development Area (SDA) 1,400 homes (Hailey Parish)**

9.2.38 Land to the north of Witney is allocated for the delivery of 1,400 homes. The site is considered to be well-related to the main services and facilities of Witney, has no major ecological or heritage constraints and based on the proposed quantum of growth, will not have a significant landscape impact.

**Main 101 9.2.45**

In terms of landscape impact, evidence22 prepared in support of the Local Plan suggested that the originally proposed quantum of development (1,000 homes) was able to be accommodated on the site without undue adverse impact. Taking account of the additional development capacity provided by the inclusion of land west of Hailey Road, a modest increase in the extent of the developable area to the north (see Figure 9.4) and slightly higher density assumptions, it is considered that around 1,400 homes can be delivered on the site whilst ensuring an acceptable degree of impact in landscape terms. A detailed landscape and visual impact assessment would however be required in support of any future application to determine the most appropriate form and layout of development which would ultimately influence final housing numbers.

Reference 22 is the Landscape and Visual Review of submissions for Carterton and Witney Strategic Development options KirkhamLandscapePlanning – October 2012

We contend that some of the statements contained in Main 97 and Main 101 above are at variance with reality, are not supported by any evidence and breach many of WODC’s own strategic objectives and policies as detailed below.

There have been three Landscape and Visual Review reports on North Witney over the last few years:

The first was the West Oxfordshire Landscape Assessment produced by Atlantic Consultants

PART THREE – Key Settlements – Witney (marked as Page 100; Page 179 of electronic document)

Key sensitivities and considerations

* high quality landscape edge - vulnerable to change
* important rural approach to Witney from the north - vulnerable to change
* special attention should be given to maintaining strong landscape edges
* resist urbanisation between Hailey and Witney

The second was produced by AHLC (Page 11)

6.16 The updated key Sensitivities and Considerations are:

* Moderate quality landscape edge with some suburbanising influences, vulnerable to change;
* Important rural approach to Witney from the north, particularly vulnerable to change given the scattered
development along the B4022 between Witney and the modern edge of Hailey village:

* Resist urbanisation between Hailey and Witney, particularly sensitive given the existing scattered development along the B4022.

6.17 In summary, Area C2 is a gently undulating plateau landscape with high intervisibility to the south and north west and a strong physical continuity with the Wychwood Uplands to the north. The area is of moderate to high importance and sensitivity.

The third report referenced in Main 101 is Landscape and Visual Review of submissions for Carterton and Witney Strategic Development options by Kirkham Landscape Planning

Against a background where the developer had proposed building 1,500 houses, Kirkham identified the following key constraints, recommendations and estimated housing capacity:

**Key Constraints to development:**

* High landscape sensitivity
* Need to protect the landscape setting of the villages and scattered farmsteads
* Need to protect the open valley landscape and its continuity with the valley northwards
* Protection of the separate identity of Hailey / Puffley End

**Recommendations**

Reduce area to avoid development within the landscape buffer which contains important surviving elements of the settled ancient pastures around the settlements.

**Recommended actions**

Consider smaller area on the southern part of the site whilst including proposed landscape transition zone to the edge of the town

**Estimated housing capacity**

750 – 850

What does WODC believe a fourth detailed landscape and visual impact assessment will deliver that has not already been identified in the previous three reports? Is this a case of asking a consultant to provide supporting evidence to justify a weak argument?

The capacity of the smaller site between the Woodstock and New Yatt roads is 200 houses resulting in 550 – 650 houses on the main site. However, WODC decided to include 1,000 houses in the Local Plan 2031. This has now been modified further to 1,400 houses (Main 97).

WODC’s statements in Main 97 that The site is considered to be well-related to the main services and facilities of Witney, has no major ecological or heritage constraints and based on the proposed quantum of growth, will not have a significant landscape impact.
and in Main 101 that

‘In terms of landscape impact, evidence prepared in support of the Local Plan suggested that the originally proposed quantum of development (1,000 homes) was able to be accommodated on the site without undue adverse impact’

are at variance with all of the landscape reports.

Urbanisation between Witney and Hailey is increased by the inclusion of the land to the west of Hailey Road – now closing the gap between Witney and Downhill Lane on both sides of the road (a massive issue to the residents of Hailey). All of the reports identify high landscape sensitivity and the need to protect the landscape setting of the scattered villages and hamlets.

The Kirkham Landscape Review which recommended 750 – 850 houses contains no supporting evidence for a development of the magnitude proposed – indeed Kirkham significantly reduced the original proposal from 1,500 to 750-850 houses.

Allowing for 200 or 300 houses on the two smaller sites, this would mean 1,100 or 1,200 houses on the main site between Hailey Road and New Yatt Road – almost doubling the Kirkham recommendation of 550 – 650 houses. This cannot be described as having no significant landscape impact.

The amended North Witney proposal breaches many of the Strategies, Core Objectives and policies contained in the Local Plan 2031 – highlighted by underlining below:

Main 9 Para 3.2 Our vision

... The larger towns and villages will accommodate growth of an appropriate scale and type to help ensure their future prosperity and that of the rural areas around them without compromising their intrinsic character, appearance and setting.

The scattered villages and hamlets of Hailey, Delly End, Poffley End, Whiteoak Green, New Yatt, Pitts Lane and Foxburrow comprise fewer than 500 houses (2011 census). Adding 1,400 houses to a parish of 500 houses can only be described as disproportionate and completely at variance with the above vision.

The proposal will merge Witney with Foxburrow, and severely compromise the intrinsic scattered rural character of Hailey parish, particularly along the B4022.

CO1 Enable new development, services and facilities of an appropriate scale and type in locations which will help improve the quality of life of local communities and where the need to travel, particularly by car, can be minimised. CO2 Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.

There is a complete absence of protection here. The character, appearance and setting of the villages within Hailey parish will change forever.

CO14 Conserve and enhance the high environmental quality of West Oxfordshire with protection and
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<td>promotion of its diverse landscape, biodiversity and geological conservation interests, and its local cultural, heritage and environmental assets.</td>
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<td>Policy OS2 – Locating Development in the Right Places</td>
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<td>... The villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. ..</td>
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<td>Small Villages, Hamlets and Open Countryside Development in the small villages, hamlets and open countryside will be limited to that which requires and is appropriate for a rural location and which respects the intrinsic character of the area.</td>
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<td>General Principles. All development should: • Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality;</td>
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<td>* form a logical complement to the existing scale and pattern of development and/or the character of the areas; • Avoid the coalescence and loss of identity of separate settlements; • Be compatible with adjoining uses and not have a harmful impact on the amenity of existing occupants; • as far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s; • not involve the loss of an area of open space or any other feature that makes an important contribution to the character or appearance of the area;</td>
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<td>* Conserve and enhance the natural, historic and built environment;</td>
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<td>This proposal will breach virtually all of these principles</td>
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<td>Policy OS4 – High Quality Design</td>
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<td>High design quality is central to the strategy for West Oxfordshire. New development should respect the historic, architectural and landscape character of the locality, and contribute to local distinctiveness and, where possible, enhance the character and quality of the surroundings and should:</td>
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<td>Policy EH1 - Landscape Character</td>
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<td>The quality, character and distinctiveness of West Oxfordshire’s natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity, will be conserved and enhanced. New development should respect and, where possible, enhance the intrinsic character, quality and distinctive natural and man-made features of the local landscape, including individual or groups of features and their settings, such as stone walls, trees, hedges, woodlands, rivers, streams and ponds. Conditions may be imposed on development proposals to ensure every opportunity is made to retain such features and ensure their long-term survival through appropriate management and restoration. Proposals which would result in the loss of features, important for their visual, amenity, or historic value will not be permitted unless the loss can be justified by appropriate mitigation and/or compensatory measures which can be secured to the satisfaction of the Council.</td>
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<td>Special attention and protection will be given to the landscape and biodiversity of the Lower Windrush Valley Project, the Windrush in Witney Project Area and the Wychwood Project Area.</td>
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<td>Although the site is part of the Wychwood Project Area there has been no special attention and a complete absence of landscape protection in the modifications to the Local Plan.</td>
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<td>There is no supporting evidence in any of the North Witney Landscape and Visual reports to justify the</td>
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| MM457 | North Witney Action Group (NWAG) | North Witney Action Group (NWAG) | Mr Neyroud | 1136 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 98 | There appears to be no new evidence to support WODC's assertion that the number of dwellings in (Kirkham) area C3 of North Witney SDA can be potentially doubled* over the 2012 Kirkham figure without having a significant effect on the intrinsic character, appearance and setting of the area. Indeed, the proposal now seems to move housing further into the green buffer zone. (Main 98, 9.4)

* Kirkham report, combined areas C2+C3 shown as 750-850 houses. C2 allocated 200; therefore C3 would be net 550-650 houses.

Proposed new housing number for area C3 now 1200 houses, or 1100 should 100 units be built on land west of Hailey Rd, as this may be used for a new school. |
| MM491 | Crest Strategic Projects | Crest Strategic Projects | - | 1462 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 98 | Main 98

6.57 Figure 9.4 details an increased area for proposed housing development to accommodate the increased number of units/education provision allocated to the North Witney SDA. The developable area has been increased in size to incorporate a parcel of land to the west of the Hailey Road. This land was not considered for development within the Landscape and Visual Review of Submission for Carterton and Witney Strategic Development Options (October 2012) prepared by Kirkham Landscape Planning Ltd which represents the most up-to-date assessment of the landscape impact of developing land at the North Witney SDA.60 As such, there is no landscape evidence base to support its inclusion within the SDA allocation. |
| MM784 | North Witney Land Consortium | North Witney Land Consortium | - | 2167 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 98 | Quantum of development and expansion of allocation site

This proposed main modification is supported to reflect the proposed increase in housing numbers at the North Witney SDA from 1,000 to 1,400 homes and to provide clarification in relation to the delivery of the West End Link and northern distributor road. For further clarification however, we would suggest that the wording of paragraph 9.2.38 be amended to "...the development will require enable the delivery of the West End Link (WEL)...

Our previous submissions have indicated that the North Witney SDA could deliver 1,400 homes without the additional land to the west of Hailey Road.

The draft wording of Policy WIT2 states however that the allocation is for "about 1,400 homes", which infers that the Council will take a flexible approach if the site could satisfactorily accommodate a higher number of units. This would help to address the concerns raised above regarding the ability of the Plan as currently drafted to meet the housing requirement for the Sub-Area and the District as a whole.

On that basis no objection is raised to these proposed main modifications in terms of the principle of including the additional land to the west of Hailey Road within the boundary of the North Witney SDA. Indeed, the potential opportunity to expand the Witney Community Primary School rather than provide a separate new school within the main site area is supported by our clients. |
Revised paragraph 9.2.45 of the Local Plan explains the Council’s justification for increasing the quantum of development on the site and the landscape work that has been undertaken to inform this. We support the acknowledgement that the site is capable of accommodating a greater number of houses than that previously suggested within the ‘Kirkham Associates Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options’ (2012).

An independent landscape review of the site and the Kirkham report previously prepared for the North Witney Consortium (and previously submitted to the council) concluded that the Kirkham report had concentrated on the wider open countryside to the north of Witney. Although we would not disagree with the high sensitivity landscape of the wider setting, it is considered that the openly visible existing settlement edge exerts an urbanising influence into a greater portion of the site than the Kirkham report suggests. The openness of the site contrasts strongly with the high level of enclosure to the north beyond the site, in the vicinity of Poffley End and Hailey, ensuring the setting to these settlements would not be compromised by development of the site.

Through sensitive masterplan design it is therefore considered that a development of around 1,400 units can be readily assimilated into the landscape without eroding the setting to Poffley End or Hailey. To that end, and as indicated at paragraph 9.2.45 of the draft Local Plan, a detailed Landscape and Visual Impact Assessment (LVIA) would be submitted in support of any future planning application, to ensure that the scale of the development proposed and its arrangement is capable of being accommodated on the site without undue adverse impact.

Given the points raised above in respect of the Council’s position on the findings of the Kirkham report referred to at footnote 56 of the Plan, and given the Council’s acceptance of the findings of the Environmental Dimension Partnership Report (EP247_10b) prepared on behalf of the Consortium, it is considered that this document should also be referred to in the footnotes. This modification will provide clarity in respect of the Council’s altered approach to the site.

In light of the Council’s comments in respect of landscape and the recognition that the SDA is capable of accommodating an increased quantum of development, it is considered that the revised Figure 9.8 at Main 98 should be updated. As with the other allocations in the Plan it is recommended that the Figure is simplified to indicate the site boundary only with all other matters of detail to be agreed through the planning application process in due course (for example, removing the areas identified in the Legend).

Phasing and Masterplanning

Main Modification 102 in respect of phasing is broadly supported in so far as it provides additional flexibility in relation to the phasing of development at North Witney.

Paragraph 9.2.48 states that:

“As a large site, development of the North Witney SDA is likely to fall into a number of phases. There is already a current planning application on part of the site for 200 dwellings which is likely to form ‘Phase 1’ (subject to a comprehensive masterplan/delivery framework for the whole site)...”

The potential for the land between New Yatt Road and Woodstock Road (to which the extract above refers) coming forward in the short term as a first phase of development of the North Witney SDA is recognised and supported. The site, which is controlled by Taylor Wimpey, lends itself to early release without prejudice to
the remainder of the site.

As well as land at Woodstock Road, Taylor Wimpey also control a substantial area of the main SDA site. Taylor Wimpey fully agree that any development on land between New Yatt Road and Woodstock Road should make proportionate contributions towards delivering the infrastructure requirements of the whole SDA. In addition to providing the first phase of the Northern Distributor Road, Taylor Wimpey is completely committed to ensuring that this early phase of development forms part of the wider SDA and does not prejudice its delivery, which can be secured through the use of planning conditions and s106 obligations as necessary.

Given the potential for the New Yatt Road/ Woodstock Road to come forward at an earlier stage and that the proposed new additional land to the West of Hailey Road is not within the control of the Consortium, the requirement for a “comprehensive masterplan” for the whole site is questioned. We therefore suggest that the reference to a “comprehensive masterplan” is removed from paragraph 9.2.48 and just the reference to a “delivery framework” retained in the interests of clarity.

The Council has proposed an additional criterion (ai) “comprehensive development to be led by an agreed masterplan” to reflect the comments in the supporting text discussed above. Whilst a masterplan for the main part of the site is supported, given the comments above it is suggested that this criterion should be amended to: “comprehensive development of the main part of the site between New Yatt Road and Hailey Road to be led by an agreed masterplan” (additional text underlined).

Criterion Di – Heritage

The Council have proposed a new criterion which requires “the conservation and where possible enhancement of the setting of the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas.” Given our comments above in respect of Policy EH7 it is considered that further amendment is required to this proposed requirement to ensure it is consistent with national policy.

Detailed heritage assessments have been undertaken on behalf of the Consortium in respect of heritage and these will inform, and assess, the detailed proposals as they continue to evolve.

Criterion L – West End Link

As with our above comments in respect of criterion Di, it is considered that this requirement should be reworded to reflect the requirements of the NPPF in respect of heritage. Furthermore, to ensure consistency with MAIN 61 discussed above, the Policy text should reflect that the North Witney SDA is to “facilitate the delivery of the West End Link.”

Other Matters

We support the recognition of the potential of land to the north of the site in terms of the potential use of off-site measures in relation to sustainable drainage for the North Witney SDA.

As highlighted in the Development Framework Document (DFD) previously submitted, as well as mitigating the impact of the proposed development, the use of additional off-site attenuation features offers the opportunity to alleviate the downstream sewer systems which are currently over capacity.
The proposed main modifications to criteria (a), (b) and (i) to Policy WIT2 relating to the North Witney SDA are supported in principle to reflect the additional capacity of the site and possibility of off-site drainage solutions, as well as providing additional flexibility in relation to the proposed phasing of development.

For the reasons detailed above in respect of MAIN 40 (not repeated here), we also maintain a strong objection to criterion (n), which requires the developer to set aside 5% of the developable plots as custom/self-build, and request that this be deleted.

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We support the conclusions of the Sustainability Appraisal Addendum Report. Given the scale of increase of the proposed SDA since the previous Sustainability Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments above.

**Viability Assessment and Infrastructure Delivery Plan**

To underpin the proposed modifications to the Local Plan, Aspinall Verdi have prepared a Strategic Development Area Viability Update (2016) on behalf of the Council. The Viability Update should be further updated to reflect our comments above in respect of custom/selfbuild housing etc.

As per the previous submissions on behalf of the Consortium, further consideration is required in respect of the necessary infrastructure required to be delivered by the site and whether this is to be funded by the SDA in isolation or whether contributions through Section 106 Agreements or CIL are to be sought from other developments in the area. We will continue to liaise with the Council in this regard in advance of the EIP.
My driveway is a quiet, privately owned (by me) drive serving three houses. There is a historic grade 2 listed ‘Dovecote’ on the drive from 1640. I object to this being opened up to cycle traffic which does not need to come past our house.

What happens if a cyclist has an accident on my land due to a ‘pot hole’ or something similar. Will I be subject to an insurance claim?

The access pathway is very narrow (see attached photograph) as is not suitable. There are other better access entrance 50m away.

The area of land required to deliver 1,400 houses is unclear. Main 98 talks of an amended plan in Figure 9.4 but this plan fails to capture area 250 shown on the SHELA map released on 12th December 2016.

Main 99 - 9.2.40b In addition to the proposed site allocation shown on Figure 9.4, there may also be some potential for further development on the land further north between New Yatt Road and Woodstock Road. The site has not been promoted for development through the Council’s housing land availability assessment and has therefore not been included within the allocation but in principle may be suitable subject to there being a demonstrable benefit e.g. in terms of improved highway access arrangements and Green Infrastructure provision.

We presume this is site 457 on the SHELA map and / or what has been previously referred to as the ‘panhandle’ alongside it. If it has not been promoted for development, why does it merit inclusion? Inclusion highlights how poor the preparation and supporting evidence is for this magnitude of development.

Main 100 - 9.2.42 In terms of flood risk, evidence suggests that there is scope to reduce surface water run-off from the site itself through the use of sustainable drainage and potential off-site enhancements. The site promoter has identified land to the north of the SDA boundary which could be used for the purpose of off-site storage.

Strategic Flood risk assessment (SFRA) Level 2 – North Witney

5.2 SuDS Requirements ... Currently around 9.5ha of open space is proposed in the north of the site, which is at the upslope limit.

The Richard Jackson Engineering Consultants’ report on flood risk was published in January 2015. However, during the following two years, no clear proposals on solutions to the flood risks and land requirements have been finalised. This SuDS flood attenuation area of 9.5ha is not identified on any of the maps.

So, in addition to the declared SDA area, we should probably add area 250, we may have to add area 457 and / or possibly the ‘panhandle’ and a further area of 9.5ha will be required for flood mitigation.

Expansion of the SDA footprint at this late stage is a major concern and the failure to clearly identify and declare the area of land required to deliver the whole of the North Witney development is an abuse of the consultation process.

Summary

All three landscape reports have identified
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<tr>
<td>MM413</td>
<td>Barwood Land</td>
<td>Barwood Land</td>
<td>Entwistle</td>
<td>915</td>
<td>WYG are instructed by Barwood Land to prepare and submit representations to the current consultation on the Proposed Modifications to the Submission Draft West Oxfordshire Local Plan 2031. Barwood has land interests in the area which are now included in the Proposed Modifications as part of the North Witney allocation. The purpose of these representations is to support the inclusion of land at North Witney as part of the North Witney Strategic Development Area (SDA), to which draft Policy WIT2 relates, and demonstrate that it could come forward, to meet much needed housing numbers, in advance of the remainder of the North Witney allocation. A map identifying the Barwood land interests within the North Witney SDA is attached to these representations. In preparing and submitting these representations regard has been had to the proposed allocation of the land and the practicalities of bringing forward the site alongside the wider development of the North Witney SDA whilst not impeding the delivery of infrastructure which will be needed to support such development. A meeting held with West Oxfordshire District Council Officer Mr Hargraves on 25th November 2016 has also been referenced in the preparation and submission of these representations. Background The Inspector’s Preliminary Findings Part 1 (IN 015) confirmed at para 1.2 that the “housing requirement in the submitted local plan of 10,500 dwellings [525 per annum] is not justified and has not been derived from a process which complies with the requirements of the NPPF.” Section 10 of the Preliminary Findings report stated that the demographic starting point is too low, that no explicit consideration had been given to the need for affordable housing and that the preference for a baseline economic growth rate was unjustified and out of step with the Government’s aims for economic growth.</td>
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Whilst the Inspector did not identify a specific housing requirement he indicated that it should be between the submitted figure of 525 dwellings per annum and the Strategic Housing Market Assessment (SHMA) figure of 660 dwellings per annum.

**Proposed Modifications**

Following a suspension of the Local Plan Examination, the Council’s Proposed Modifications to the emerging Local Plan identify at Para 5.12 and Policy H1 that the total level of housing provision to be provided in West Oxfordshire across the Plan period of 2011-2031 is 19,950 homes. This comprises 13,200 homes to meet West Oxfordshire’s own needs and a further 2,750 homes during the period 2021-2031 to assist with the unmet needs of Oxford City.

Policy H1 goes on to state that a significant proportion of new homes will be provided at, inter alia, Witney, and the Witney sub-area is proposed to provide 4,400 new dwellings across the Plan period.

The Proposed Modifications also now set out that the Strategic Development Area on land ‘north of Witney’ is proposed to provide a 400 dwelling increase to that originally proposed as well as an increase in the land that will comprise the SDA.

Figure 9.4 in the Proposed Modifications document highlights the now proposed SDA land parcels, including my client’s land interests at Hailey Road as identified on the Plan attached to this letter (Attached). The proposed development of this land for around 100 new dwellings (para 9.2.40a) is fully supported as part of the SDA allocation.

Notwithstanding the support for this additional land, specific comments are made in respect of criteria d) in the proposed Policy WIT2. A meeting held between my client and Mr Hargraves at West Oxfordshire District Council on 25th November 2016 identified that the reference to the land west of Hailey Road as a possible extension for the existing Witney Community Primary School identified that this is not to be taken forwards as a proposal. Oxfordshire County Education have confirmed that their ambition is to achieve the provision of a new school to serve the wider North Witney allocation and not to simply expand the existing one.

**Barwood Land Interests and Site Deliverability**

The inclusion of my Client’s land interests at Hailey Road in the North Witney SDA as identified in the Proposed Modifications to the emerging West Oxfordshire Local Plan is fully supported. As set out in para 4.3 of the Inspector’s Preliminary Findings - Part 1 (In 015), the LPA has consistently delivered housing numbers lower than the current requirement of 525 and the inclusion of this parcel of land within the SDA is such that it could come forward independently of the remainder of the allocation, to be delivered within five years to contribute toward the identified housing need in West Oxfordshire.

In turn the development of the land would provide the appropriate, and proportionate contributions towards funds for the necessary infrastructure required to support the entire North Witney SDA, as identified in the proposed emerging Local Plan Policy WIT2. The provision of a monetary contribution through Section 106 funding as part of any planning permission granted for the site should be acceptable with regard to relevant Secretary of State decisions (e.g. APP/D3125/W/15/3005737, land at Burford Road, Witney), where the principle of a financial contribution toward the delivery of infrastructure improvements has been found acceptable.
It is therefore suggested that an early application for the development of my client’s land interests at Hailey Road would be appropriate, to both assist in the Council being able to maintain a 5 year land supply position whilst the infrastructure constraints associated with the delivery of the wider allocation are addressed.

Indeed, as set out at para 16 of the Secretary of State decision referenced above, the provision of monetary contributions toward the provision of strategic infrastructure may also aid the delivery of the wider Strategic Development Area (which in this case was the East Witney SDA).

To summarise, the inclusion of my client’s land interests within the North Witney SDA in the Proposed Modifications to the emerging West Oxfordshire Local Plan 2031 are fully supported. The Council is, however, requested to:

1) Remove any reference to the provision of an extension to the North Witney Community Primary School from the draft Policy WIT2, criteria d); and
2) To encourage the submission of an early planning application, which would assist in enabling West Oxfordshire District Council to maintain a demonstrable five year land supply, and secure financial contributions toward the provision of essential infrastructure which will, in turn, enable the delivery of the wider SDA Allocation at North Witney.

The text indicates that a primary school may be removed and replaced as part of this proposal. Sport England recommends that the Council ensure that any playing fields associated with the primary school are also replaced.

As a local resident with a close interest in the past development of Witney over the last 40 years and its future form I would strongly suggest that with regard to the comments made under 9.2.40b, serious consideration should be given to the incorporation the area to the north between New Yatt Road and Woodstock Road within the Strategic Development Area. In my experience it would be a mistake to disregard the significance of this area in enabling proper decisions to be made in respect of the most advantageous route of the new distributor road and best place for its link with the Woodstock Road and Jubilee Way. Furthermore, it would be better for future development in this area to be properly integrated within the SDA on a comprehensive basis rather than be considered as an add on at a later date. The addition of this area will also make the the infrastructure costs, especially the West End link, more feasible.

Quantum of development and expansion of allocation site

This proposed main modification is supported to reflect the proposed increase in housing numbers at the North Witney SDA from 1,000 to 1,400 homes and to provide clarification in relation to the delivery of the West End Link and northern distributor road. For further clarification however, we would suggest that the wording of paragraph 9.2.38 be amended to “...the development will require enable the delivery of the West End Link (WEL)...”

Our previous submissions have indicated that the North Witney SDA could deliver 1,400 homes without the additional land to the west of Hailey Road.

The draft wording of Policy WIT2 states however that the allocation is for “about 1,400 homes”, which infers...
that the Council will take a flexible approach if the site could satisfactorily accommodate a higher number of units. This would help to address the concerns raised above regarding the ability of the Plan as currently drafted to meet the housing requirement for the Sub-Area and the District as a whole.

On that basis no objection is raised to these proposed main modifications in terms of the principle of including the additional land to the west of Hailey Road within the boundary of the North Witney SDA. Indeed, the potential opportunity to expand the Witney Community Primary School rather than provide a separate new school within the main site area is supported by our clients.

Revised paragraph 9.2.45 of the Local Plan explains the Council’s justification for increasing the quantum of development on the site and the landscape work that has been undertaken to inform this. We support the acknowledgement that the site is capable of accommodating a greater number of houses than that previously suggested within the ‘Kirkham Associates Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options’ (2012).

An independent landscape review of the site and the Kirkham report previously prepared for the North Witney Consortium (and previously submitted to the council) concluded that the Kirkham report had concentrated on the wider open countryside to the north of Witney. Although we would not disagree with the high sensitivity landscape of the wider setting, it is considered that the openly visible existing settlement edge exerts an urbanising influence into a greater portion of the site than the Kirkham report suggests. The openness of the site contrasts strongly with the high level of enclosure to the north beyond the site, in the vicinity of Poffley End and Hailey, ensuring the setting to these settlements would not be compromised by development of the site.

Through sensitive masterplan design it is therefore considered that a development of around 1,400 units can be readily assimilated into the landscape without eroding the setting to Poffley End or Hailey. To that end, and as indicated at paragraph 9.2.45 of the draft Local Plan, a detailed Landscape and Visual Impact Assessment (LVIA) would be submitted in support of any future planning application, to ensure that the scale of the development proposed and its arrangement is capable of being accommodated on the site without undue adverse impact.

Given the points raised above in respect of the Council’s position on the findings of the Kirkham report referred to at footnote 56 of the Plan, and given the Council’s acceptance of the findings of the Environmental Dimension Partnership Report (EP247_10b) prepared on behalf of the Consortium, it is considered that this document should also be referred to in the footnotes. This modification will provide clarity in respect of the Council’s altered approach to the site.

In light of the Council’s comments in respect of landscape and the recognition that the SDA is capable of accommodating an increased quantum of development, it is considered that the revised Figure 9.8 at Main 98 should be updated. As with the other allocations in the Plan it is recommended that the Figure is simplified to indicate the site boundary only with all other matters of detail to be agreed through the planning application process in due course (for example, removing the areas identified in the Legend).

Phasing and Masterplanning

Main Modification 102 in respect of phasing is broadly supported in so far as it provides additional flexibility in relation to the phasing of development at North Witney.
Paragraph 9.2.48 states that:

"As a large site, development of the North Witney SDA is likely to fall into a number of phases. There is already a current planning application on part of the site for 200 dwellings which is likely to form ‘Phase 1’ (subject to a comprehensive masterplan/delivery framework for the whole site)…"

The potential for the land between New Yatt Road and Woodstock Road (to which the extract above refers) coming forward in the short term as a first phase of development of the North Witney SDA is recognised and supported. The site, which is controlled by Taylor Wimpey, lends itself to early release without prejudice to the remainder of the site.

As well as land at Woodstock Road, Taylor Wimpey also control a substantial area of the main SDA site. Taylor Wimpey fully agree that any development on land between New Yatt Road and Woodstock Road should make proportionate contributions towards delivering the infrastructure requirements of the whole SDA, in addition to providing the first phase of the Northern Distributor Road. Taylor Wimpey is completely committed to ensuring that this early phase of development forms part of the wider SDA and does not prejudice its delivery, which can be secured through the use of planning conditions and s106 obligations as necessary.

Given the potential for the New Yatt Road/ Woodstock Road to come forward at an earlier stage and that the proposed new additional land to the West of Hailey Road is not within the control of the Consortium, the requirement for a “comprehensive masterplan” for the whole site is questioned. We therefore suggest that the reference to a “comprehensive masterplan” is removed from paragraph 9.2.48 and just the reference to a “delivery framework” retained in the interests of clarity.

Criterion Di – Heritage

The Council have proposed a new criterion which requires “the conservation and where possible enhancement of the setting of the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas.” Given our comments above in respect of Policy EH7 it is considered that further amendment is required to this proposed requirement to ensure it is consistent with national policy.

Detailed heritage assessments have been undertaken on behalf of the Consortium in respect of heritage and these will inform, and assess, the detailed proposals as they continue to evolve.

Criterion L – West End Link

As with our above comments in respect of criterion Di, it is considered that this requirement should be reworded to reflect the requirements of the NPPF in respect of heritage. Furthermore, to ensure consistency with MAIN 61 discussed above, the Policy text should reflect that the North Witney SDA is to “facilitate the delivery of the West End Link.”
We support the recognition of the potential of land to the north of the site in terms of the potential use of off-site measures in relation to sustainable drainage for the North Witney SDA.

As highlighted in the Development Framework Document (DFD) previously submitted, as well as mitigating the impact of the proposed development, the use of additional off-site attenuation features offers the opportunity to alleviate the downstream sewer systems which are currently over capacity.

The proposed main modifications to criteria (a), (b) and (i) to Policy WIT2 relating to the North Witney SDA are supported in principle to reflect the additional capacity of the site and possibility of off-site drainage solutions, as well as providing additional flexibility in relation to the proposed phasing of development.

For the reasons detailed above in respect of MAIN 40 (not repeated here), we also maintain a strong objection to criterion (n), which requires the developer to set aside 5% of the developable plots as custom/self-build, and request that this be deleted.

Sustainability Appraisal

Enfusion, on behalf of WODC, have prepared a Sustainability Appraisal Addendum Report in respect of the proposed modifications to the Local Plan. In respect of the increased scale and quantum of development proposed at the North Witney SDA, the Addendum advises that “the findings of the SA as reported in the Submission SA Report remain valid.”

We support the conclusions of the Sustainability Appraisal Addendum Report. Given the scale of increase of the proposed SDA since the previous Sustainability Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments above.

Viability Assessment and Infrastructure Delivery Plan

To underpin the proposed modifications to the Local Plan, Aspinall Verdi have prepared a Strategic Development Area Viability Update (2016) on behalf of the Council. The Viability Update should be further updated to reflect our comments above in respect of custom/selfbuild housing etc.

As per the previous submissions on behalf of the Consortium, further consideration is required in respect of the necessary infrastructure required to be delivered by the site and whether this is to be funded by the SDA in isolation or whether contributions through Section 106 Agreements or CIL are to be sought from other developments in the area. We will continue to liaise with the Council in this regard in advance of the EIP.

Stagecoach welcomes the recognition in para. 9.2.40b that further land to the east of the proposed allocation, between New Yatt Road and Woodstock Road would represent a possible suitable sustainable direction of growth. We have previously suggested that such a direction of growth would be greatly easier to serve with high quality bus services, based on the improvement of the existing service to Hanborough Station and beyond along the A4095, which itself aligns with the County’s adopted Transport Plan suite; and this
While no promoter has yet been in a position to secure control of the site, the evidence suggests that should the site become available, it is likely to be both suitable and achievable, to a degree that other options being proposed for allocation may not be, to the same extent. Stagecoach considers that this is a "reasonable alternative" of sufficient merit that the site might be allocated as a "reserve site", or be subject to an "opportunity-based" policy.

The area of land required to deliver 1,400 houses is unclear. Main 98 talks of an amended plan in Figure 9.4 but this plan fails to capture area 250 shown on the SHELA map released on 12th December 2016.

In addition to the proposed site allocation shown on Figure 9.4, there may also be some potential for further development on the land further north between New Yatt Road and Woodstock Road. The site has not been promoted for development through the Council's housing land availability assessment and has therefore not been included within the allocation but in principle may be suitable subject to there being a demonstrable benefit e.g. in terms of improved highway access arrangements and Green Infrastructure provision.

We presume this is site 457 on the SHELA map and / or what has been previously referred to as the 'panhandle' alongside it. If it has not been promoted for development, why does it merit inclusion? Inclusion highlights how poor the preparation and supporting evidence is for this magnitude of development.

In terms of flood risk, evidence suggests that there is scope to reduce surface water run-off from the site itself through the use of sustainable drainage and potential off-site enhancements. The site promoter has identified land to the north of the SDA boundary which could be used for the purpose of off-site storage.

Currently around 9.5ha of open space is proposed in the north of the site, which is at the upslope limit. The Richard Jackson Engineering Consultants' report on flood risk was published in January 2015. However, during the following two years, no clear proposals on solutions to the flood risks and land requirements have been finalised. This SuDS flood attenuation area of 9.5ha is not identified on any of the maps.

So, in addition to the declared SDA area, we should probably add area 250, we may have to add area 457 and / or possibly the 'panhandle' and a further area of 9.5ha will be required for flood mitigation.

Expansion of the SDA footprint at this late stage is a major concern and the failure to clearly identify and declare the area of land required to deliver the whole of the North Witney development is an abuse of the consultation process.

Summary

All three landscape reports have identified

* High landscape sensitivity
* Need to protect the landscape setting of the villages and scattered farmsteads
* Need to protect the open valley landscape and its continuity with the valley northwards
* Need to resist urban development between Hailey and Witney
* Protection of the separate identity of Hailey / Poffley End

All three reports have been ignored.

The closure of one of the two gaps between Witney and Hailey (development proposed on both sides of the B4022 South of Downhill Lane) by inclusion of land west of Hailey Road is one of the largest breaches, effectively joining Witney and the Foxburrow area of Hailey.

The declaration in Main 97 that the building of 1,400 houses ‘will not have a significant landscape impact’ is not sustained by additional evidence. Proposing a fourth landscape and visual impact assessment underlines the weakness of WODC’s case and exposes the fragility of their statements.

The area of land required to deliver this development has not been clearly identified and may require an extension of the SDA. It is, at best, unprofessional to put out a consultation on this proposal without a clear declaration of the land area required for successful delivery.

The proposals breach many of WODCs own strategic objectives and policies as outlined above.

These two statements appear to be vague references to the six attenuation ponds (60,000 cubic metre capacity) situated outside and to the north of the main SDA area on the 100 metre contour, and first published on WODC’s website in November 2015 in WOLP36 (43163/C/013 - Drainage Strategy Plan). This document (WOLP36), commissioned by Meridian Land, was ultimately revealed following the Inspector’s Q&A document IN004 and WODC’s subsequent response WOLP24.

It is unacceptable that WODC is still unable to give more detail about a critical piece of flood attenuation infrastructure when this, the developer’s own Technical Report, was dated prior to the original submission of the Local Plan to the Inspector for examination. (WOLP36 - Richard Jackson Engineering Consultants, report dated 16/01/2015).

Flood Attenuation

It is unacceptable that WODC is still unable to be more specific about a critical piece of Witney’s flood attenuation infrastructure in North Witney SDA than shown in Main 103 & 100, “This may include consideration of ‘off-site’ solutions.” and “…could be used for the purpose of off-site storage.” Considering that the developer’s flood consultants (Richard Jackson Engineering) in WOLP36 are recommending a very significantly sized 60,000 cubic metre reservoir to be built outside the SDA in Hailey, we would expect more detail at this stage, not a vague, non-committal comment.

Quantum of development and expansion of allocation site
Consortium

This proposed main modification is supported to reflect the proposed increase in housing numbers at the North Witney SDA from 1,000 to 1,400 homes and to provide clarification in relation to the delivery of the West End Link and northern distributor road. For further clarification however, we would suggest that the wording of paragraph 9.2.38 be amended to “…the development will require enable the delivery of the West End Link (WELL).”

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The draft wording of Policy WIT2 states however that the allocation is for “about 1,400 homes”, which infers that the Council will take a flexible approach if the site could satisfactorily accommodate a higher number of units. This would help to address the concerns raised above regarding the ability of the Plan as currently drafted to meet the housing requirement for the Sub-Area and the District as a whole.

On that basis no objection is raised to these proposed main modifications in terms of the principle of including the additional land to the west of Hailey Road within the boundary of the North Witney SDA. Indeed, the potential opportunity to expand the Witney Community Primary School rather than provide a separate new school within the main site area is supported by our clients.

Revised paragraph 9.2.45 of the Local Plan explains the Council’s justification for increasing the quantum of development on the site and the landscape work that has been undertaken to inform this. We support the acknowledgement that the site is capable of accommodating a greater number of houses than that previously suggested within the ‘Kirkham Associates Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options’ (2012).

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Through sensitive masterplan design it is therefore considered that a development of around 1,400 units can be readily assimilated into the landscape without eroding the setting to Poffley End or Hailey. To that end, and as indicated at paragraph 9.2.45 of the draft Local Plan, a detailed Landscape and Visual Impact Assessment (LVIA) would be submitted in support of any future planning application, to ensure that the scale of the development proposed and its arrangement is capable of being accommodated on the site without undue adverse impact.

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In light of the Council’s comments in respect of landscape and the recognition that the SDA is capable of...
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Phasing and Masterplanning

Main Modification 102 in respect of phasing is broadly supported in so far as it provides additional flexibility in relation to the phasing of development at North Witney.

Paragraph 9.2.48 states that:

"As a large site, development of the North Witney SDA is likely to fall into a number of phases. There is already a current planning application on part of the site for 200 dwellings which is likely to form ‘Phase 1’ (subject to a comprehensive masterplan/delivery framework for the whole site)..."

The potential for the land between New Yatt Road and Woodstock Road (to which the extract above refers) coming forward in the short term as a first phase of development of the North Witney SDA is recognised and supported. The site, which is controlled by Taylor Wimpey, lends itself to early release without prejudice to the remainder of the site.

As well as land at Woodstock Road, Taylor Wimpey also control a substantial area of the main SDA site. Taylor Wimpey fully agree that any development on land between New Yatt Road and Woodstock Road should make proportionate contributions towards delivering the infrastructure requirements of the whole SDA, in addition to providing the first phase of the Northern Distributor Road. Taylor Wimpey is completely committed to ensuring that this early phase of development forms part of the wider SDA and does not prejudice its delivery, which can be secured through the use of planning conditions and s106 obligations as necessary.

Given the potential for the New Yatt Road/ Woodstock Road to come forward at an earlier stage and that the proposed new additional land to the West of Hailey Road is not within the control of the Consortium, the requirement for a “comprehensive masterplan” for the whole site is questioned. We therefore suggest that the reference to a "comprehensive masterplan" is removed from paragraph 9.2.48 and just the reference to a “delivery framework” retained in the interests of clarity.

The Council has proposed an additional criterion (ai) "comprehensive development to be led by an agreed masterplan" to reflect the comments in the supporting text discussed above. Whilst a masterplan for the main part of the site is supported, given the comments above it is suggested that this criterion should be amended to: “comprehensive development of the main part of the site between New Yatt Road and Hailey Road to be led by an agreed masterplan” (additional text underlined).

Criterion Di - Heritage

The Council have proposed a new criterion which requires "the conservation and where possible enhancement of the setting of the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas." Given our comments above in respect of Policy EH7 it is considered that further amendment is required to this proposed requirement to ensure it is consistent with national policy.
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Detailed heritage assessments have been undertaken on behalf of the Consortium in respect of heritage and these will inform, and assess, the detailed proposals as they continue to evolve.

**Criterion L - West End Link**

As with our above comments in respect of criterion Di, it is considered that this requirement should be reworded to reflect the requirements of the NPPF in respect of heritage. Furthermore, to ensure consistency with MAIN 65 discussed above, the Policy text should reflect that the North Witney SDA is to “facilitate the delivery of the West End Link.”

**Other Matters**

We support the recognition of the potential of land to the north of the site in terms of the potential use of off-site measures in relation to sustainable drainage for the North Witney SDA.

As highlighted in the Development Framework Document (DFD) previously submitted, as well as mitigating the impact of the proposed development, the use of additional off-site attenuation features offers the opportunity to alleviate the downstream sewer systems which are currently over capacity.

The proposed main modifications to criteria (a), (b) and (i) to Policy WIT2 relating to the North Witney SDA are supported in principle to reflect the additional capacity of the site and possibility of off-site drainage solutions, as well as providing additional flexibility in relation to the proposed phasing of development.

For the reasons detailed above in respect of MAIN 40 (not repeated here), we also maintain a strong objection to criterion (n), which requires the developer to set aside 5% of the developable plots as custom/self-build, and request that this be deleted.

**Sustainability Appraisal**

Enfusion, on behalf of WODC, have prepared a Sustainability Appraisal Addendum Report in respect of the proposed modifications to the Local Plan. In respect of the increased scale and quantum of development proposed at the North Witney SDA, the Addendum advises that “the findings of the SA as reported in the Submission SA Report remain valid.”

We support the conclusions of the Sustainability Appraisal Addendum Report. Given the scale of increase of the proposed SDA since the previous Sustainability Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments above.

**Viability Assessment and Infrastructure Delivery Plan**

To underpin the proposed modifications to the Local Plan, Aspinall Verdi have prepared a Strategic Development Area Viability Update (2016) on behalf of the Council. The Viability Update should be further updated to reflect our comments above in respect of custom/selfbuild housing etc.

As per the previous submissions on behalf of the Consortium, further consideration is required in respect of...
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<td>MM92</td>
<td>Devonshires</td>
<td>ACrawford</td>
<td>Mr Crawford</td>
<td>236</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 100</td>
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| MM399 | Hailey Parish Council | Graham Knaggs | Mr Knaggs       | 875       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 100 | I live in Poffley End. I support the cogent views set out in the submission from the Hailey Parish Council dated 21/12/2016. However, neither the local plan, nor the Hailey Parish Council submission emphasise the impact of the proposed plan on flooding in the North Witney area. At present, there is already limited run-off for flood water along the road between Witney and Hailey. In addition, there remains a high risk of flooding on the surrounding lower lying areas, such as Poffley End. Development of 1400 homes in an area where there are currently 500 homes, would:  
* Close the gap between Witney and Hailey;  
* Destroy the landscape setting of the scattered villages and hamlets; And  
* Will cause extensive flooding on existing properties. |

The area of land required to deliver 1,400 houses in unclear. Main 98 talks of an amended plan in Figure 9.4 but this plan fails to capture area 250 shown on the SHELA map released on 12th December 2016.  
Main 99 - 9.2.40b In addition to the proposed site allocation shown on Figure 9.4, there may also be some potential for further development on the land further north between New Yatt Road and Woodstock Road. The site has not been promoted for development through the Council’s housing land availability assessment and has therefore not been included within the allocation but in principle may be suitable subject to there being a demonstrable benefit e.g. in terms of improved highway access arrangements and Green Infrastructure provision.  
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Strategic Flood risk assessment (SFRA) Level 2 – North Witney  
5.2 SuDS Requirements .... Currently around 9.5ha of open space is proposed in the north of the site, which is at the up slope limit. The Richard Jackson Engineering Consultants’ report on flood risk was published in January 2015. However, during the following two years, no clear proposals on solutions to the flood risks and land requirements have been finalised. This SuDS flood attenuation area of 9.5ha is not identified on any of the maps.  
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<td>MM457</td>
<td>North Witney Action Group NWAG</td>
<td>North Witney Action Group (NWAG)</td>
<td>Mr Neyroud</td>
<td>1122</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 101</td>
<td>The North Witney SDA housing number has been increased from 1,000 to 1,400. This is a 40% increase, and NWAG contend that use of the phrases &quot;...a modest increase...&quot;, &quot;...slightly higher density...&quot; and &quot;...an acceptable degree of impact in landscape term.&quot; do not reflect the full impact of the increase, and lack any evidence to back up the statements.</td>
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<td>North Witney Action Group (NWAG)</td>
<td>Mr Neyroud</td>
<td>1129</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 101</td>
<td>WODC's latest 2012 Kirkham Report, specifically commissioned to support the local plan, estimated that the housing capacity for the combined areas of land C2/C3 would be 750-850 units. (LAN3, Section 'B', Summary of Recommendations). With a total of three WODC Landscape Reports (1998 (Atlantic), 2007 (Hopwood) &amp; 2012 (Kirkham)) all resisting urbanisation between Hailey and Witney, and the final one (Kirkham) recommending a very significantly lower housing capacity than 1,400 units, NWAG questions why a fourth report would give a different result now than in 2012?</td>
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<td>MM457</td>
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<td>North Witney Action Group (NWAG)</td>
<td>Mr Neyroud</td>
<td>1144</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>There appears to be no new evidence to support WODC's assertion that the number of dwellings in (Kirkham) area C3 of North Witney SDA can be potentially doubled&quot; over the 2012 Kirkham figure without having a significant effect on the intrinsic character, appearance and setting of the area. Indeed, the proposal now seems to move housing further into the green buffer zone. (Main 98, 9.4)</td>
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</table>

Summary

All three landscape reports have identified

* High landscape sensitivity
* Need to protect the landscape setting of the villages and scattered farmsteads
* Need to protect the open valley landscape and its continuity with the valley northwards
* Need to resist urban development between Hailey and Witney
* Protection of the separate identity of Hailey / Poffley End

All three reports have been ignored.

The closure of one of the two gaps between Witney and Hailey (development proposed on both sides of the B4022 South of Downhill Lane) by inclusion of land west of Hailey Road is one of the largest breaches, effectively joining Witney and the Foxburrow area of Hailey.

The declaration in Main 97 that the building of 1,400 houses 'will not have a significant landscape impact' is not sustained by additional evidence. Proposing a fourth landscape and visual impact assessment underlines the weakness of WODC's case and exposes the fragility of their statements.

The area of land required to deliver this development has not been clearly identified and may require an extension of the SDA. It is, at best, unprofessional to put out a consultation on this proposal without a clear declaration of the land area required for successful delivery.

The proposals breach many of WODCs own strategic objectives and policies as outlined above.
WODC has completely ignored the findings of their own commissioned (Kirkham 2012) Report, and which they earlier relied upon. (Main 101, 9.2.45, note 22)

* Kirkham report, combined areas C2+C3 shown as 750-850 houses.
C2 allocated 200; therefore C3 would be net 550-650 houses.

Proposed new housing number for area C3 now 1200 houses, or 1100 should 100 units be built on land west of Hailey Rd, as this may be used for a new school.

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The North Witney SDA housing number has been increased from 1,000 to 1,400. This is a 40% increase, and WODC’s use of the phrases in Main 101 “modest increase, ...slightly higher density, and ...an acceptable degree of impact in landscape term.” cannot reflect the full impact this increase would undeniably have.

There is no new evidence to support WODC’s assertion that the number of dwellings in the largest area of North Witney SDA can be virtually doubled over the 2012 Kirkham Report’s recommended net C3 figure of 550-650 (new figure for area C3 is 1,100 to 1,200), without having a significant effect on the intrinsic character, appearance and setting of the area, particularly as it is now proposing to move housing further into the C3 green buffer zone.
Our previous submissions have indicated that the North Witney SDA could deliver 1,400 homes without the additional land to the west of Hailey Road.

The draft wording of Policy WIT2 states however that the allocation is for "about 1,400 homes", which infers that the Council will take a flexible approach if the site could satisfactorily accommodate a higher number of units. This would help to address the concerns raised above regarding the ability of the Plan as currently drafted to meet the housing requirement for the Sub-Area and the District as a whole.

On that basis no objection is raised to these proposed main modifications in terms of the principle of including the additional land to the west of Hailey Road within the boundary of the North Witney SDA. Indeed, the potential opportunity to expand the Witney Community Primary School rather than provide a separate new school within the main site area is supported by our clients.

Revised paragraph 9.2.45 of the Local Plan explains the Council's justification for increasing the quantum of development on the site and the landscape work that has been undertaken to inform this. We support the acknowledgement that the site is capable of accommodating a greater number of houses than that previously suggested within the 'Kirkham Associates Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options' (2012).

An independent landscape review of the site and the Kirkham report previously prepared for the North Witney Consortium (and previously submitted to the council) concluded that the Kirkham report had concentrated on the wider open countryside to the north of Witney. Although we would not disagree with the high sensitivity landscape of the wider setting, it is considered that the openly visible existing settlement edge exerts an urbanising influence into a greater portion of the site than the Kirkham report suggests. The openness of the site contrasts strongly with the high level of enclosure to the north beyond the site, in the vicinity of Poffley End and Hailey, ensuring the setting to these settlements would not be compromised by development of the site.

Through sensitive masterplan design it is therefore considered that a development of around 1,400 units can be readily assimilated into the landscape without eroding the setting to Poffley End or Hailey. To that end, and as indicated at paragraph 9.2.45 of the draft Local Plan, a detailed Landscape and Visual Impact Assessment (LVIA) would be submitted in support of any future planning application, to ensure that the scale of the development proposed and its arrangement is capable of being accommodated on the site without undue adverse impact.

Given the points raised above in respect of the Council's position on the findings of the Kirkham report referred to at footnote 56 of the Plan, and given the Council's acceptance of the findings of the Environmental Dimension Partnership Report (EP247_10b) prepared on behalf of the Consortium, it is considered that this document should also be referred to in the footnotes. This modification will provide clarity in respect of the Council's altered approach to the site.

In light of the Council's comments in respect of landscape and the recognition that the SDA is capable of accommodating an increased quantum of development, it is considered that the revised Figure 9.8 at Main 98 should be updated. As with the other allocations in the Plan it is recommended that the Figure is simplified to indicate the site boundary only with all other matters of detail to be agreed through the planning application.
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Phasing and Masterplanning

Main Modification 102 in respect of phasing is broadly supported in so far as it provides additional flexibility in relation to the phasing of development at North Witney.

Paragraph 9.2.48 states that:

"As a large site, development of the North Witney SDA is likely to fall into a number of phases. There is already a current planning application on part of the site for 200 dwellings which is likely to form ‘Phase 1’ (subject to a comprehensive masterplan/delivery framework for the whole site)..."

The potential for the land between New Yatt Road and Woodstock Road (to which the extract above refers) coming forward in the short term as a first phase of development of the North Witney SDA is recognised and supported. The site, which is controlled by Taylor Wimpey, lends itself to early release without prejudice to the remainder of the site.

As well as land at Woodstock Road, Taylor Wimpey also control a substantial area of the main SDA site. Taylor Wimpey fully agree that any development on land between New Yatt Road and Woodstock Road should make proportionate contributions towards delivering the infrastructure requirements of the whole SDA, in addition to providing the first phase of the Northern Distributor Road. Taylor Wimpey is completely committed to ensuring that this early phase of development forms part of the wider SDA and does not prejudice its delivery, which can be secured through the use of planning conditions and S106 obligations as necessary.

Given the potential for the New Yatt Road/ Woodstock Road to come forward at an earlier stage and that the proposed new additional land to the West of Hailey Road is not within the control of the Consortium, the requirement for a “comprehensive masterplan” for the whole site is questioned. We therefore suggest that the reference to a “comprehensive masterplan” is removed from paragraph 9.2.48 and just the reference to a “delivery framework” retained in the interests of clarity.

The Council has proposed an additional criterion (ai) “comprehensive development to be led by an agreed masterplan” to reflect the comments in the supporting text discussed above. Whilst a masterplan for the main part of the site is supported, given the comments above it is suggested that this criterion should be amended to: “comprehensive development of the main part of the site between New Yatt Road and Hailey Road to be led by an agreed masterplan” (additional text underlined).

Criterion Di – Heritage

The Council have proposed a new criterion which requires “the conservation and where possible enhancement of the setting of the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas.” Given our comments above in respect of Policy EH7 it is considered that further amendment is required to this proposed requirement to ensure it is consistent with national policy.

Detailed heritage assessments have been undertaken on behalf of the Consortium in respect of heritage and these will inform, and assess, the detailed proposals as they continue to evolve.
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**Criterion L – West End Link**

As with our above comments in respect of criterion Di, it is considered that this requirement should be reworded to reflect the requirements of the NPPF in respect of heritage. Furthermore, to ensure consistency with MAIN 61 discussed above, the Policy text should reflect that the North Witney SDA is to "facilitate the delivery of the West End Link."

**Other Matters**

We support the recognition of the potential of land to the north of the site in terms of the potential use of off-site measures in relation to sustainable drainage for the North Witney SDA.

As highlighted in the Development Framework Document (DFD) previously submitted, as well as mitigating the impact of the proposed development, the use of additional off-site attenuation features offers the opportunity to alleviate the downstream sewer systems which are currently over capacity.

The proposed main modifications to criteria (a), (b) and (i) to Policy WIT2 relating to the North Witney SDA are supported in principle to reflect the additional capacity of the site and possibility of off-site drainage solutions, as well as providing additional flexibility in relation to the proposed phasing of development.

For the reasons detailed above in respect of MAIN 40 (not repeated here), we also maintain a strong objection to criterion (n), which requires the developer to set aside 5% of the developable plots as custom/self-build, and request that this be deleted.

**Sustainability Appraisal**

Enfusion, on behalf of WODC, have prepared a Sustainability Appraisal Addendum Report in respect of the proposed modifications to the Local Plan. In respect of the increased scale and quantum of development proposed at the North Witney SDA, the Addendum advises that "the findings of the SA as reported in the Submission SA Report remain valid."

We support the conclusions of the Sustainability Appraisal Addendum Report. Given the scale of increase of the proposed SDA since the previous Sustainability Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments above.

**Viability Assessment and Infrastructure Delivery Plan**

To underpin the proposed modifications to the Local Plan, Aspinall Verdi have prepared a Strategic Development Area Viability Update (2016) on behalf of the Council. The Viability Update should be further updated to reflect our comments above in respect of custom/selfbuild housing etc.

As per the previous submissions on behalf of the Consortium, further consideration is required in respect of the necessary infrastructure required to be delivered by the site and whether this is to be funded by the SDA in isolation or whether contributions through Section 106 Agreements or CIL are to be sought from other developments in the area. We will continue to liaise with the Council in this regard in advance of the EIP.
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| MM399        | Hailey Parish Council   | Graham Knaggs    | Mr Knaggs        | 870       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 101 | Main 97 North Witney Strategic Development Area (SDA) 1,400 homes (Hailey Parish)  
9.2.38 Land to the north of Witney is allocated for the delivery of 1,400 homes. The site is considered to be well-related to the main services and facilities of Witney, has no major ecological or heritage constraints and based on the proposed quantum of growth, will not have a significant landscape impact.  
Main 101 9.2.45  
In terms of landscape impact, evidence prepared in support of the Local Plan suggested that the originally proposed quantum of development (1,000 homes) was able to be accommodated on the site without undue adverse impact. Taking account of the additional development capacity provided by the inclusion of land west of Hailey Road, a modest increase in the extent of the developable area to the north (see Figure 9.4) and slightly higher density assumptions, it is considered that around 1,400 homes can be delivered on the site whilst ensuring an acceptable degree of impact in landscape terms. A detailed landscape and visual impact assessment would however be required in support of any future application to determine the most appropriate form and layout of development which would ultimately influence final housing numbers.  
Reference 22 is the Landscape and Visual Review of submissions for Carterton and Witney Strategic Development options KirkhamLandscapePlanning – October 2012  
We contend that the some of the statements contained in Main 97 and Main 101 above are at variance with reality, are not supported by any evidence and breach many of WODC’s own strategic objectives and policies as detailed below.  
There have been three Landscape and Visual Review reports on North Witney over the last few years:  
The first was the West Oxfordshire Landscape Assessment produced by Atlantic Consultants  
PART THREE – Key Settlements – Witney (marked as Page 100; Page 179 of electronic document)  
Key sensitivities and considerations  
* high quality landscape edge – vulnerable to change  
* important rural approach to Witney from the north – vulnerable to change  
* special attention should be given to maintaining strong landscape edges  
* resist urbanisation between Hailey and Witney  
The second was produced by AHLC (Page 11)  
6.16 The updated key Sensitivities and Considerations are:  
* Moderate quality landscape edge with some suburbanising influences, vulnerable to change;  
* Important rural approach to Witney from the north, particularly vulnerable to change given the scattered development along the B4022 between Witney and the modern edge of Hailey village;  
* Resist urbanisation between Hailey and Witney, particularly sensitive given the existing scattered development along the B4022.  
6.17 In summary, Area C2 is a gently undulating plateau landscape with high intervisibility to the south and |
The third report referenced in Main 101 is Landscape and Visual Review of submissions for Carterton and Witney Strategic Development options by Kirkham Landscape Planning.

Against a background where the developer had proposed building 1,500 houses, Kirkham identified the following key constraints, recommendations, and estimated housing capacity:

**Key Constraints to development:**

- High landscape sensitivity
- Need to protect the landscape setting of the villages and scattered farmsteads
- Need to protect the open valley landscape and its continuity with the valley northwards
- Protection of the separate identity of Hailey / Poffley End

**Recommendations**

Reduce area to avoid development within the landscape buffer which contains important surviving elements of the settled ancient pastures around the settlements.

**Recommended actions**

Consider smaller area on the southern part of the site whilst including proposed landscape transition zone to the edge of the town.

**Estimated housing capacity**

750 – 850

What does WODC believe a fourth detailed landscape and visual impact assessment will deliver that has not already been identified in the previous three reports? Is this a case of asking a consultant to provide supporting evidence to justify a weak argument?

The capacity of the smaller site between the Woodstock and New Yatt roads is 200 houses resulting in 550 – 650 houses on the main site. However, WODC decided to include 1,000 houses in the Local Plan 2031. This has now been modified further to 1,400 houses (Main 97).

WODC's statements in Main 97 that the site is considered to be well-related to the main services and facilities of Witney, has no major ecological or heritage constraints and based on the proposed quantum of growth, will not have a significant landscape impact.

and in Main 101 that

"In terms of landscape impact, evidence prepared in support of the Local Plan suggested that the originally proposed quantum of development (1,000 homes) was able to be accommodated on the site without undue..."
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<td>are at variance with all of the landscape reports.</td>
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<td>Urbanisation between Witney and Hailey is increased by the inclusion of the land to the west of Hailey Road – now closing the gap between Witney and Downhill Lane on both sides of the road (a massive issue to the residents of Hailey). All of the reports identify high landscape sensitivity and the need to protect the landscape setting of the scattered villages and hamlets.</td>
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<td>The Kirkham Landscape Review which recommended 750 – 850 houses contains no supporting evidence for a development of the magnitude proposed – indeed Kirkham significantly reduced the original proposal from 1,500 to 750-850 houses.</td>
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<td>Allowing for 200 or 300 houses on the two smaller sites, this would mean 1,100 or 1,200 houses on the main site between Hailey Road and New Yatt Road – almost doubling the Kirkham recommendation of 550 – 650 houses. This cannot be described as having no significant landscape impact.</td>
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<td>The amended North Witney proposal breaches many of the Strategies, Core Objectives and policies contained in the Local Plan 2031 – highlighted by underlining below:</td>
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<td>Main 9 Para 3.2 Our vision</td>
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<td>... The larger towns and villages will accommodate growth of an appropriate scale and type to help ensure their future prosperity and that of the rural areas around them without compromising their intrinsic character, appearance and setting.</td>
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<td>The scattered villages and hamlets of Hailey, Delly End, Poffley End, Whiteoak Green, New Yatt, Pitts Lane and Foxburrow comprise fewer than 500 houses (2011 census). Adding 1,400 houses to a parish of 500 houses can only be described as disproportionate and completely at variance with the above vision.</td>
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<td>The proposal will merge Witney with Foxburrow, and severely compromise the intrinsic scattered rural character of Hailey parish, particularly along the B4022.</td>
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<td>CO1 Enable new development, services and facilities of an appropriate scale and type in locations which will help improve the quality of life of local communities and where the need to travel, particularly by car, can be minimised. CO2 Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.</td>
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<td>There is a complete absence of protection here. The character, appearance and setting of the villages within Hailey parish will change forever.</td>
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<td>CO14 Conserve and enhance the high environmental quality of West Oxfordshire with protection and promotion of its diverse landscape, biodiversity and geological conservation interests, and its local cultural, heritage and environmental assets.</td>
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<td>Policy OS2 – Locating Development in the Right Places</td>
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Small Villages, Hamlets and Open Countryside Development in the small villages, hamlets and open countryside will be limited to that which requires and is appropriate for a rural location and which respects the intrinsic character of the area.

**General Principles.** All development should:
- Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality;
- Form a logical complement to the existing scale and pattern of development and/or the character of the area;
- Avoid the coalescence and loss of identity of separate settlements;
- Be compatible with adjoining uses and not have a harmful impact on the amenity of existing occupants;
- As far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s;
- Not involve the loss of an area of open space or any other feature that makes an important contribution to the character or appearance of the area;
- Conserve and enhance the natural, historic and built environment;

This proposal will breach virtually all of these principles.

Policy OS4 – High Quality Design

High design quality is central to the strategy for West Oxfordshire. New development should respect the historic, architectural and landscape character of the locality, and contribute to local distinctiveness and, where possible, enhance the character and quality of the surroundings and should:

Policy EH1 - Landscape Character

The quality, character and distinctiveness of West Oxfordshire’s natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity, will be conserved and enhanced. New development should respect and, where possible, enhance the intrinsic character, quality and distinctive natural and man-made features of the local landscape, including individual or groups of features and their settings, such as stone walls, trees, hedges, woodlands, rivers, streams and ponds. Conditions may be imposed on development proposals to ensure every opportunity is made to retain such features and ensure their long-term survival through appropriate management and restoration. Proposals which would result in the loss of features, important for their visual, amenity, or historic value will not be permitted unless the loss can be justified by appropriate mitigation and/or compensatory measures which can be secured to the satisfaction of the Council.

Special attention and protection will be given to the landscape and biodiversity of the Lower Windrush Valley Project, the Windrush in Witney Project Area and the Wychwood Project Area.

Although the site is part of the Wychwood Project Area there has been no special attention and a complete absence of landscape protection in the modifications to the Local Plan.

There is no supporting evidence in any of the North Witney Landscape and Visual reports to justify the modification from 1,000 to 1,400 houses and the proposal breaches many of WODC’s own policies. The development should be withdrawn and replaced by South Witney.

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<td>North Witney Action Group NWAG</td>
<td>Mr Neyroud</td>
<td>1333</td>
<td>&gt; SECTION 9 - STRATEGY AT THE MAIN 20, Policy OS5. The use of the newly added word “timely” in relation to the provision of supporting infrastructure is greatly concerning.</td>
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Previously a start had to be made on infrastructure “ahead of the majority of development coming forward.” (Main 102, 9.2.48), but, for whatever reason, this commitment has now been fully deleted.

Clearly there is now a probability that vital infrastructure will be significantly delayed. Worse still, there is a real possibility that it (or parts of it) will not be built at all post the starting of the development. NWAG says this situation cannot be allowed to prevail.

Quantum of development and expansion of allocation site

This proposed main modification is supported to reflect the proposed increase in housing numbers at the North Witney SDA from 1,000 to 1,400 homes and to provide clarification in relation to the delivery of the West End Link and northern distributor road. For further clarification however, we would suggest that the wording of paragraph 9.2.38 be amended to “…the development will require enable the delivery of the West End Link (WELL)...”

Our previous submissions have indicated that the North Witney SDA could deliver 1,400 homes without the additional land to the west of Hailey Road.

The draft wording of Policy WIT2 states however that the allocation is for “about 1,400 homes”, which infers that the Council will take a flexible approach if the site could satisfactorily accommodate a higher number of units. This would help to address the concerns raised above regarding the ability of the Plan as currently drafted to meet the housing requirement for the Sub-Area and the District as a whole.

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Paragraph 9.2.48 states that:

"As a large site, development of the North Witney SDA is likely to fall into a number of phases. There is already a current planning application on part of the site for 200 dwellings which is likely to form 'Phase 1' (subject to a comprehensive masterplan/delivery framework for the whole site)..."

The potential for the land between New Yatt Road and Woodstock Road (to which the extract above refers) coming forward in the short term as a first phase of development of the North Witney SDA is recognised and supported. The site, which is controlled by Taylor Wimpey, lends itself to early release without prejudice to the remainder of the site.

As well as land at Woodstock Road, Taylor Wimpey also control a substantial area of the main SDA site. Taylor Wimpey fully agree that any development on land between New Yatt Road and Woodstock Road should make proportionate contributions towards delivering the infrastructure requirements of the whole SDA, in addition to providing the first phase of the Northern Distributor Road. Taylor Wimpey is completely committed to ensuring that this early phase of development forms part of the wider SDA and does not prejudice its delivery, which can be secured through the use of planning conditions and s106 obligations as necessary.

Given the potential for the New Yatt Road/ Woodstock Road to come forward at an earlier stage and that the proposed new additional land to the West of Hailey Road is not within the control of the Consortium, the requirement for a “comprehensive masterplan” for the whole site is questioned. We therefore suggest that the reference to a “comprehensive masterplan” is removed from paragraph 9.2.48 and just the reference to a “delivery framework” retained in the interests of clarity.

The Council has proposed an additional criterion (ai) “comprehensive development to be led by an agreed masterplan” to reflect the comments in the supporting text discussed above. Whilst a masterplan for the main part of the site is supported, given the comments above it is suggested that this criterion should be amended to: “comprehensive development of the main part of the site between New Yatt Road and Hailey Road to be led by an agreed masterplan” (additional text underlined).
Criterion Di – Heritage

The Council have proposed a new criterion which requires "the conservation and where possible enhancement of the setting of the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas." Given our comments above in respect of Policy EH7 it is considered that further amendment is required to this proposed requirement to ensure it is consistent with national policy.

Detailed heritage assessments have been undertaken on behalf of the Consortium in respect of heritage and these will inform, and assess, the detailed proposals as they continue to evolve.

Criterion L – West End Link

As with our above comments in respect of criterion Di, it is considered that this requirement should be reworded to reflect the requirements of the NPPF in respect of heritage. Furthermore, to ensure consistency with MAIN 61 discussed above, the Policy text should reflect that the North Witney SDA is to "facilitate the delivery of the West End Link."

Other Matters

We support the recognition of the potential of land to the north of the site in terms of the potential use of off-site measures in relation to sustainable drainage for the North Witney SDA.

As highlighted in the Development Framework Document (DFD) previously submitted, as well as mitigating the impact of the proposed development, the use of additional off-site attenuation features offers the opportunity to alleviate the downstream sewer systems which are currently over capacity.

The proposed main modifications to criteria (a), (b) and (i) to Policy WIT2 relating to the North Witney SDA are supported in principle to reflect the additional capacity of the site and possibility of off-site drainage solutions, as well as providing additional flexibility in relation to the proposed phasing of development.

For the reasons detailed above in respect of MAIN 40 (not repeated here), we also maintain a strong objection to criterion (n), which requires the developer to set aside 5% of the developable plots as custom/self-build. and request that this be deleted.

Sustainability Appraisal

Enfusion, on behalf of WODC, have prepared a Sustainability Appraisal Addendum Report in respect of the proposed modifications to the Local Plan. In respect of the increased scale and quantum of development proposed at the North Witney SDA, the Addendum advises that "the findings of the SA as reported in the Submission SA Report remain valid."

We support the conclusions of the Sustainability Appraisal Addendum Report. Given the scale of increase of the proposed SDA since the previous Sustainability Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments above.
Viability Assessment and Infrastructure Delivery Plan

To underpin the proposed modifications to the Local Plan, Aspinall Verdi have prepared a Strategic Development Area Viability Update (2016) on behalf of the Council. The Viability Update should be further updated to reflect our comments above in respect of custom/selfbuild housing etc.

As per the previous submissions on behalf of the Consortium, further consideration is required in respect of the necessary infrastructure required to be delivered by the site and whether this is to be funded by the SDA in isolation or whether contributions through Section 106 Agreements or CIL are to be sought from other developments in the area. We will continue to liaise with the Council in this regard in advance of the EIP.

As a large site, development of the North Witney SDA is likely to fall into a number of phases. There is already a current planning application on part of the site for 200 dwellings which is likely to form ‘Phase 1’ (subject to a comprehensive masterplan/delivery framework for the whole site). Because of the lead-in times associated with larger strategic sites, it is likely that the With regard to phasing, it is proposed that the larger part majority of the site will be phased to come forward later in the plan period after 2021 unless delivery can be accelerated. This phased approach will Delivery of the bulk of development in the medium to long-term would however offer the following advantages:

### MAIN 102 Para 9.2.48 Phasing of North of Witney Strategic Development Area

Stagecoach notes that the evidence base suggests that delivery of Shores Green slip roads will be needed in advance of significant development in excess of 200 units between New Yatt Road and Woodstock Road. Stagecoach is of the view that it is likely that strategic bus service enhancements on Woodstock Road, linking Witney to Hanborough Station and beyond with a half-hourly service, would be likely to materially damp peak journeys in the area currently made by car, sufficient to make it possible to justify the early release of this part of the proposed allocation as a first phase.

Stagecoach has previously objected to the allocation of the bulk of the SDA, on the grounds that it has not been clear that the traffic impacts on Bridge Street can be satisfactorily mitigated by the proposals. If this critical dependency can be addressed, then much of the allocation might be made sustainable.

We note, and agree strongly that phasing of the larger portion of the site needs to follow post 2021, and this needs to follow the delivery of both the Shores Green Slip Roads, and the West End Link Road, if the requirements of NPPF paragraph 32 are to be satisfied.

While it is conceded that more evidence might yet be adduced as to what the critical thresholds might be that allow a portion of the allocation to be brought forward, it is far from clear what this is. Stagecoach disputes that anything other than a suitable micro-simulation of the local network is an appropriate tool to fully appraise what the impacts on the local network and junctions should be. Larger scale tools such as SATURN would not represent appropriate tools, as they cannot accurately model the impacts in sufficient detail.

Should either or both of these not prove to be fundable and deliverable at a suitably early stage, it is clear that the known residual cumulative unmitigated impacts would permit the remaining allocation to be brought forward, as in line with NPPF paragraph 32 and DfT Ministerial Circular 02/2013, the exacerbation of already serious traffic congestion at Bridge Street is in Stagecoach’s view likely to judged to be “severe”.

We propose that Policy should reflect this critical dependency in a much more explicit way, requiring that...
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<td>MM399</td>
<td>Hailey Parish Council</td>
<td>Graham Knaggs</td>
<td>Mr</td>
<td>Knaggs</td>
<td>877</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 102</td>
<td>further micro-simulation be used to model a range of scenarios, including the full completion of an all-movements junction at Shores Green, to assess one or more development thresholds beyond which &quot;nil detriment&quot; to existing conditions at Bridge Street would be breached.</td>
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<td>MM399</td>
<td>Hailey Parish Council</td>
<td>Graham Knaggs</td>
<td>Mr</td>
<td>Knaggs</td>
<td>880</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 102</td>
<td>Main 104 – Alternative Options for Strategic Growth at Witney</td>
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<td>Land to the south of Witney which straddles the boundaries of Ducklington and Curbridge Parishes, whilst physically proximate to the town centre and main employment areas in the south is segregated from the town by the A40. There are concerns regarding noise, odour and landscape impact and unlike the alternative options, the scheme would not deliver any strategic highway improvements for Witney.</td>
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<td>Policy T1 – Sustainable Transport Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.</td>
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<td>Witney's main traffic bottleneck is at Bridge Street. With an average of 29,000 vehicles a day, it is the only vehicular crossing of the River Windrush for local journeys and through traffic from the north and east. The</td>
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constraint of the river combined with the level of demand for vehicular travel results in severe congestion, delays to buses and air pollution (it is already an Air Quality Management Area). The environment deters cyclists and pedestrians from using the route.

The new A40/Down's Road junction and A40/Shores Green improvements (Main 102) will significantly reduce traffic (and air pollution) in Bridge Street whereas the North Witney proposal combined with the recent successful applications on New Yatt Road (270 and 40 houses) will substantially increase traffic (and air pollution) in Bridge Street. Replacing North Witney with South Witney would potentially release £40m of S106 funding:

Northern Distributor Road (£10m) West End Link road (£23.2m)
Foul water drainage (£3m) Flood alleviation (£3m)

We will also work with Oxfordshire County Council to identify funding for their long term strategy for the A40 which will involve dualling between Witney and Eynsham and a westbound bus lane.

However, the £55m funding to facilitate the above long term strategy has yet to be identified. Selection of South Witney as an alternative to North Witney could be used to facilitate Oxfordshire County Council's transport strategy outlined above to improve the A40 between Witney and Oxford. This proposed change of strategy would benefit substantially more residents than the existing strategy.

Other advantages to replacing North Witney with South Witney are:

* Traffic from South Witney would avoid the Bridge Street bottleneck (Air quality management area) on journeys into Witney.
* A South Witney development would be able to take advantage of the existing four way A40 junction at Ducklington and the proposed four way A40 junction with Downs Road, providing direct access to the main employment areas of Oxford, Witney and Carterton.
* Conversely the development of 1,400 houses at North Witney would significantly increase traffic in Bridge Street, even with the delivery of WEL2.

Remove North Witney from the Local Plan 2031 and replace with South Witney.

---

**MM444**

K Bennett  
Mr Bennett  
ID 1001  

My comments are:

1) When will the bottleneck at the bottom of the road from Bicester & Bridge Street be resolved? I first complained about this in 1953 (!!) and of course it is now even worse!
2) When will the Hailey Road-Burford Road link be activated rather than council waffle being made (WEL)?
3) When will there be any definite proposals for road construction & amenities before the proposals for housing are raised, i.e. schools, play areas, shops etc. rather than piece-meal aspirations (supposedly good developments)?

Please let's have some sensible action.
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<td>MM445</td>
<td>Thames Valley Police - Simon Dackombe</td>
<td>Mr</td>
<td>Dackombe</td>
<td>1008</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103 Please make reference under caveat b) to the provision of both of on-site and off-site infrastructure where required.</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>1076</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103 Historic England welcomes and supports Proposed Main Modification MAIN103 for the addition of criteria relating to the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas; to the investigation, recording and safeguarding of the archaeological significance of the area; and to the results of that investigation informing the final layout of the development; and the addition of &quot;heritage assets&quot; to criterion l), as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework.</td>
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<td>MM460</td>
<td>J Burbage</td>
<td>Mr</td>
<td>Burbage</td>
<td>1134</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103 I would like to express my objection to the proposed development of 1400 houses on the land to the north of Witney (Hailey Parish), the proposed West End link road and the Shores Green slip road, and would comment as follows:- I cannot believe that yet again, despite all the tales of woe, and television coverage over recent years, that I am witnessing a proposal-to build on a floodplain! If approved, then this will be a disaster waiting to happen. The local area has a history of flooding and in particular Eastfield Road, which now repeatedly floods year after year, with regular traffic diversions along Farmers Close, New Yatt Road and Woodgreen Road which causes major disruption and inconvenience for local residents. This proposed development will only exacerbate the situation and increase the flow of water into the river Windrush, making the flooding of High street even more problematical. The suggestion of holding ponds is not welcome and will cause a problem to the wildlife which is already at threat. The impact of 1400 new homes on the transport system will cause massive disruption to local residents and the impact will be even greater when the inevitable flooding occurs, due to the increased number of people trying to navigate around the problem. Please note that the local roads are already at bursting point at commuting times. From experience the commute into Oxford can take up to between one hour and one and a half hours to travel just 22 miles. This development will create the scenario of trying to get a quart into a pint pot. I believe that there will be a severe risk to Highway safety for all road users, cyclists and pedestrians due to inadequate roads for the increased volume of traffic. I am fed up with driving along poorly maintained roads which repeatedly flood and have no wish to sanction something that will only add to the problem. This development will change the Parish boundary between Witney and Hailey. This will in effect change the character of both districts in a detrimental way. We currently have visits from an interesting array of rare wildlife ranging from Bats, Barn Owls, both sorts of Woodpecker, Pied Wagtails, Kestrel's plus other more common birds. The habitat of these at risk creatures will be removed and the fear is that we will not see them return. This is a greenfield site and should remain as agricultural land. West End Link Road I fail to see what use this will be to the residents of Witney and I consider it to be a total waste of time, effort...</td>
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<td>MM462</td>
<td>North Witney Action Group NWAG</td>
<td>Joy Midwinter</td>
<td>Mrs</td>
<td>Midwinter</td>
<td>1141</td>
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<td>MM457</td>
<td>North Witney Action Group (NWAG)</td>
<td>North Witney Action Group (NWAG)</td>
<td>Mr</td>
<td>Neyroud</td>
<td>1147</td>
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<td>MM467</td>
<td>Dinah Harris</td>
<td>Miss</td>
<td>Harris</td>
<td>1167</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
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| MM56          | roger bryant            | mr             | bryant           | 121               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 103 | Witney Proposal.  
1. The additional 400 houses added to North Witney between Hailey Road and Woodstock Road to achieve "viability" are no longer required to hit the overall housing target because of planning approval already given for Burford Road and Downs Road of 540 houses. This extra 400 houses will put an additional strain on the local economy in terms of traffic, parking, schooling and health. The additional 400 houses will probably generate another 200 cars.  
2. Whilst accepting that additional school places will be required for a development in North Witney which may require additional temporary space at Witney Community School, the answer is not to extend the existing school into the adjoining field, but to build a new school in the development. The extension of Witney Community School and the building of a further 100 house will add significantly to the flood risk on Hailey Road and increase the traffic congestion. It is already quite dangerous around the school at peak times.  
3. Three reports have recommended retaining the gap between Witney and Hailey, and Kirkham Associates in their report have concluded that only 750-850 houses should be built in the area of North Witney. The present draft plan envisages nearly doubling this to 1500 houses in the North Witney Area. This is unacceptable.  
4. Any development in North Witney will increase the traffic in Foxburrow Lane. This single track lane is used now as a "rat run". Any development in the area needs to include traffic calming measures in that lane and through Crawley. This is missing from the plan.  
5. We already know that developers are chasing significant land purchase beyond the present North Witney Development proposals. |
| MM496         | G Brown and P Hartwell  | -              | Brown and Hartwell | 1234             | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 103 | Further to our letter to you on the 17th September 2014 outlining our concerns over the North Witney Housing Development, we are aware that there are now proposed plans for modifications to the West Oxfordshire Local Plan (2011-2031).  
We understand that the plans keep getting rejected due to the North Witney Site being flawed with multiple issues; we therefore are appealing to WODC Councillors to take action and seriously consider removing the North Witney Site from the local plan due to it being unsound.  
The main issues as we see it are summarised below:  
• North Witney Site officers want to increase number of houses from 1000 to 1400, on ancient undulating farmland, that is entirely in the parish of Hailey and part of the Wychwood Project.  
• The West End Link Road has to be built before North Witney is developed. It will not pass an essential test (the bridge would be in a zone 3B flood plain and the development is not essential). The cost in 2012 was £18m, the developers own flood report says the water levels would rise 1.5 inches, not an insignificant level.  
• Both the OCC and the recent Burford Road Appeal inspector agree that Shore’s Green is the second river crossing.  
• Through four Freedom of Information requests OCC traffic counts show traffic flows increase in West Endby 52.5%, in the Witney Conservation Area by 47.1% and Hailey Road becomes the third busiest road in Witney with traffic tripling in volume.  
• All the water flowing down from 100m contours has to move through the 0.75m Hailey Drain. To restrain this, they plan to build six reservoirs each the size of Wembley Stadium on land above the development, how will the water be redirected up the hill, this fails to... |
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<td>MM498</td>
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<td>Katy Jennison</td>
<td>Dr</td>
<td>Jennison</td>
<td>1236</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>I was disappointed in the changes made so far to the draft Local Plan 2031. I address only the North Witney Strategic Development Area, since I know it well and can therefore comment upon how the Plan affects it. Despite the acknowledgement that this is an area of high water stress (4.27a) and serious traffic congestion, I see that the original designation of 1,000 new houses for land to the north of Witney has been expanded to 1,400 houses (5.29). I object to this even more strongly than I did to the earlier figure, for a number of reasons. First, 9.2.38 reads &quot;The site is considered to be well-related to the main services and facilities of Witney, has no major ecological or heritage constraints and based on the proposed quantum of growth, will not have a significant landscape impact.&quot; None of these statements is true. First, 1,400 houses mean at least 1,400 vehicles attempting to access &quot;the main services and facilities of Witney&quot; via Woodstock Road, Hailey Road and New Yatt Road. New Yatt Road is a narrow residential road with unavoidable residential on-street parking, which already leads to passing difficulties, readily observable to anyone standing outside WODC's Wood Green offices. Woodstock Road and West End leading from Hailey Road are already unacceptably congested at many times of day (including school start and finish times): the proposed new river crossing would simply move those traffic-jams and add them to the existing one in Burford Road as it approaches Bridge Street. The second statement, that this site &quot;has no major ecological or heritage constraints&quot; is also highly dubious. As the Plan states in 8.12, &quot;In the same way as West Oxfordshire has a rich and diverse landscape, so too does it contain a rich variety of habitats, which support a wide range of legally protected species, priority species and other wildlife (including those listed in the NERC Act Section 41 list).&quot; Further paragraphs in this section of the plan refer to minimising the impact on biodiversity, the value of natural habitats, and so on. These are splendid aspirations, which are completely contradicted by the housing proposals. The land north of Witney is a richly bio-diverse environment, home to at least two species of owl and much other wildlife. Much of this area is valuable agricultural land which the south of England loses at its peril, at a time of spiralling food-mile costs. Local councils should be at the forefront in resisting this damaging destruction. The third statement refers to landscape impact. This area has notorious flooding problems. I note that the draft states (9.2.42) &quot;In terms of flood risk, evidence suggests that there is scope to reduce surface water run-off from the site itself through the use of sustainable drainage and potential offsite enhancements. The site promoter has identified land to the north of the SDA boundary which could be used for the purpose of off-site storage.&quot; I very much regret that the public exhibitions... in</td>
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<td>MM505</td>
<td>Verena Hunt</td>
<td>Miss Hunt</td>
<td>1246</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>I support these amendments to Policy WIT2 and the proposed modest increase in the extent of this SDA for the strategic growth of Witney. I strongly oppose suggestions made by some to replace this allocation at North Witney with an alternative site at Carterton. There has been no detailed examination of the site proposed by Carterton Town Council in its masterplan. This is not an approved Neighbourhood Plan and it has not been consulted on as part of the Local Plan process.</td>
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<td>MM547</td>
<td>Helen Midwinter-Morten</td>
<td>Mrs Midwinter-Morten</td>
<td>1298</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>The councilors voted for an increase in houses from 1000 to 1400 without seeing this in any map or application. To my knowledge this increase has not been explained nor shown to anyone. Also the six attenuation tanks seem to have been omitted from any plan visible - and yet a vote has been taken on them being built. At what point will these plans be transparent to everyone and not just behind closed doors?</td>
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<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
<td>-</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>6.60 There is no objection to allocation of the North Witney SDA as a logical location for housing development at Witney, which performs an important role as one of the three main towns within the District where a significant proportion of new development is directed. However, the evidence base does not support expansion of the allocation from 1,000 to 1,400 dwellings. Therefore for the reasons set out at Main 90, the</td>
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1590</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>expansion of the allocation runs contrary to the Council’s evidence base and national planning policy.</td>
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<td>MM728</td>
<td>Abbey Developments and David Wilson Homes Southern</td>
<td>-</td>
<td>-</td>
<td>1670</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>Flood Attenuation It is unacceptable that WODC is still unable to be more specific about a critical piece of Witney’s flood attenuation infrastructure in North Witney SDA than shown in Main 103 &amp; 100, &quot;This may include consideration of ‘off-site’ solutions,&quot; and &quot;...could be used for the purpose of off-site storage.” Considering that the developer’s flood consultants (Richard Jackson Engineering) in WOLP36 are recommending a very significantly sized 60,000 cubic metre reservoir to be built outside the SDA in Hailey, we would expect more detail at this stage, not a vague, non-committal comment.</td>
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expense of land already within the site boundary which was previously identified for 'Environmental Enhancement' including landscape mitigation. This goes against the recommendations, as quoted above, within the council’s evidence base West Oxfordshire Draft Local Plan 2012 - Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options (October 2012) and the West Oxfordshire Pre-Submission Draft Local Plan - Assessment of Strategic Site Options (February 2015). Whist the increase in developable land beyond the boundary deemed acceptable in the council’s evidence base would undoubtedly have a significant and harmful impact in terms of landscape characteristics, it is not considered that the increase is substantial enough to offer a significant increase in the number of dwellings deliverable on the site. In particular, in terms of increase the developable land to the north of the site, whilst the impacts of increasing the quantum of developable land will have a significant negative impact on the landscape, it is not considered that the quantum of additional land would be sufficient to provide a large number of additional units - especially not in the region of 300.

MAIN101 requires that any future application would be required to be supported by a detailed landscape and visual assessment to determine the appropriate form and layout of development which would ultimately influence final housing numbers. Given that previous landscape advice has stated that the quantum of development would need to be reduced to 1,000 houses in order to be acceptable in landscape terms, it seems unlikely that 1,400 houses on this site can be accommodated without resulting in adverse harm. The Sustainability Appraisal Addendum Report, Paragraph 4.636, states that there is ‘uncertainty until lower level detailed studies have been completed to inform final numbers, site layout and form’. This statement recognises that there are questions remaining about the capacity of the site. The Council should not be relying on figures which they themselves recognise are ‘uncertain’ to meet their OAN. Instead, additional sites should be allocated within the plan to ensure that there is enough flexibility to deliver the housing required to meet needs.

In addition to the above which questions the ability of the site to accommodate 1,400 houses without resulting in adverse harm to the landscape character of the area. The infrastructure needs associated with the development must also be considered. The site is severed from the majority of services in Witney by the River Windrush, as a result of this location, a significant burden is placed upon the Bridge Street river crossing. In order to mitigate the additional burden that any residential development would add, extensive highway mitigation works are required to be provided in the form of West End Link Road. Within the West Oxfordshire District Council Local Plan Pre-Submission Draft Sustainability Appraisal Report (2015) there is recognition that with regards to highways there is the “potential for residual minor long-term negative effects with an element of uncertainty” (p62). It goes onto say that whilst development at North Witney has the potential to deliver transport infrastructure, which could result in a minor long-term positive effect, there is still an element of uncertainty with regards to deliverability (p63). There is nothing within the West Oxfordshire District Council Local Plan: Proposed Main Modifications Sustainability Appraisal Addendum Report (2016) to suggest that the uncertainty raised within the previous Sustainability Appraisal (2015) have been overcome.

Within the Local Plan, the highway improvements which would be required for any development at North Witney are presented as a wider benefit of the development. Indeed, the lack of need for highway improvements is a criticism levelled at the potential development of the South Witney site.

This is a misinterpretation of what can be expected in terms of delivery via a section 106 agreement. Any infrastructure secured by S106 would need to be proportionate to the scale of the development,
directly related to the development and necessary to make the development acceptable in planning terms. Therefore, when considering any potential highways improvements, these will only be delivered if they are necessary to mitigate impacts and should not in this case be considered as a wider positive consideration.

The expected construction phase of the North Witney SDA is set out within the Appendix 2 of the Local Plan. This delivery timetable shows no houses expected to be delivered on the site until 2021/22.

During 2021-2031, the site is programmed to deliver its entire proposed allocation of 1,400 homes.

To achieve this deliver requires 200 units per annum for 4 consecutive years with the following year to deliver 175 units.

In November 2016, Nathaniel Lichfield & Partners (NLP) published Start to Finish - How Quickly do Large-Scale Housing Sites Deliver? This research provides a comprehensive review of 70 strategic sites which have / will deliver in excess of 500 dwellings. NLP’s research focused on a variety of locations with a focus on sites outside of London. With respect to the timeline of the build-out period, the research notes that whilst “many planners’ housing trajectories show large sites gradually increasing their output and then remaining steady before trailing off in the end, in fact, delivery rates are not steady” (p16). NLP’s research concludes that when looking at the first 8 years of the buildout of a large scheme, completions tend to be higher in the early phases before tailing off towards the end and for sites with a build out period of longer than 8 years, the peaks and troughs of delivery can be repeated. This research casts doubt over the programme for delivery of houses on the North Witney site which does not reflect the true nature of housing delivery on a large site.

The NLP research also considers the average build out rate for sites of differing sizes and types (page 19). For Greenfield sites with between 1,000-1,499 dwellings, the average annual build-out rate over the duration of the development is 122 dwellings per annum (table 3). If the North Witney site achieves this build out rate then by the end of the plan period, the site will have under delivered against the OAN by 180 dwellings. Given the timetable for delivery on this site which is in the final 10 years of the plan period, there is no provision included to allow any flexibility if the optimistic build out rates are not delivered.

The NLP research clearly raises significant doubt as to the current deliverability of the full North Witney allocation within the plan period, let alone the proposed revision through the Main Modifications. We therefore suggest that further sites should be allocated which will deliver in the short to medium term to ensure that the requirement will be met.

East Witney

We object to the proposed increase in the capacity of the East Witney SDA to 450 homes (MAIN93).

The Proposed Main Modifications Sustainability Appraisal Addendum Report (October, 2016) states that ‘a proposed increase in housing from 400 to 450 dwellings represents a comparatively modest increase and is still less than the scale of acceptable development of around 500 homes determined with regard to landscape and visual effects’ (4.61). The Sustainability Appraisal Addendum references the West Oxfordshire District Council (2012) Landscape and Visual Review of Submissions for Carterton for 500 units. This is not the case. The Landscape and Visual Review (2012) document concluded that taking mitigation into account, there is the potential for the landscape to accommodate from 250 - 300 dwelling (p86).

The conclusion of the Landscape and Visual Review (2012) (that the site is able to accommodate 250- 300
dwellings) were reiterated in the Pre-Submission Draft Sustainability Appraisal Report (February, 2015) which allocated the site for 400 dwellings. In relation to the landscape and visual impact of this level of housing, the 2015 Sustainability Appraisal recognised that given the findings of the Landscape and Visual Review (2012), the development of 400 dwellings could have ‘major long-term negative effects on an area considered to have high landscape/visual importance and sensitivity’ (Appendix V p27). Notwithstanding this, the council ignored this part of their evidence base and allocated the site to deliver 400 houses within the Pre-Submission Draft Local Plan.

The increase proposed within the Main Modification 93 to accommodate a further 50 units will have further negative effects on the landscape character of the area. This increase has not been given due consideration in the Proposed Main Modifications Sustainability Appraisal Addendum Report (2016) which wrongly presents information that in landscape terms, 500 dwellings would be acceptable. The West Oxfordshire District Council (2012) Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options remains within the council evidence base and clearly states that the site is suitable for 250-300 dwellings and, an increase on this figure would result in adverse harm to the area which is considered to have landscape / visual importance. An allocation of 450 dwellings is clearly directly opposed to the evidence base and, would constitute a quantum of development unable to be sustainably accommodated within the site.

Woodford Way Car Park

The Woodford Way Car Park is allocated to deliver 50 houses within the medium to long term. This is a non-strategic housing allocation and we understand the land to be in the ownership of West Oxfordshire District Council. The basis for this allocation seems to be a previous grant of planning permission in February 2007 for the site for the: ‘Redevelopment to provide multiplex cinema, retail uses, residential, new urban square, town park, landscaping, multi storey car park, public toilets, access and servicing’. This grant of planning permission for a mixed-use scheme lapsed without implementation.

The supporting text to the allocation within the emerging Local Plan (MAIN 106, para 9.2.5f) states that ‘whilst not available in the short term, it is reasonable to expect that a residential scheme could come forward on this site within the plan period’ [emphasis added]. Having regard to national policy, a site where there is not a reasonable prospect that the site is available and could be viably developed at the point envisaged should not be allocated for development to help meet needs.

South Witney

Previously submitted representations made by Barton Willmore have confirmed that the South Witney site is available for development. Furthermore, those representations were supported by a range of environmental surveys and assessments which demonstrate that the site is a suitable location for new strategic housing development. A Development Framework Document has been submitted previous which illustrates how the site could be deliver a residential-led proposal with capacity for up to 1,200 homes.

MAIN104 states that several alternative options for growth in Witney have been considered. However, that having regard to the overall housing requirement and evidence prepared in light of the local plan, these sites have not been allocated but will be reconsidered as part of any subsequent local plan review. This suggests that the council have not found the alternative sites to be unsustainable or fundamentally inappropriate for development, but they consider that they are not required at this stage to meet needs. It also suggests that, when the local plan evidence base is considered, the sites which have been chosen are adequate and the most appropriate to accommodate the objectively assessed needs. In relation to the site at North Witney, this
Comment is clearly not the case as the evidence base firmly indicates that the site can only accommodate 1,000 dwellings and any more than this would cause adverse harm to the landscape character. Nor is it the case for the allocation of the site at East Witney which the evidence base states can accommodate a maximum of 250-300 dwellings without causing substantial harm to the landscape character of the area (West Oxfordshire District Council (2012) Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options; p86). As such, there is the need for additional housing sites in Witney to come forward as part of this plan to ensure that, on the basis of the evidence base, housing needs can be accommodated sustainably. Therefore, the time to reconsider the other sites in Witney which were not allocated is now-- This will allow for needs to be accommodated on sites sustainably without the need to adversely impact on the landscape character or to deliver a cramped form of development at densities which are not appropriate to their setting.

In relation to the Land to the South of Witney, paragraph 9.2.50 refers to the site and states that there are 'concerns regarding noise, odour, landscape and unlike the alternative options, the scheme would not deliver any strategic highways improvements'. In relation to the areas of concern which are raised, comprehensive technical evidence has been provided as previous stages of consultation that confirms beyond doubt that through mitigation, all concerns can be overcome and would not compromise the deliverability of the site. For your ease of reference, we attach the South Witney Development Framework Document (September 2014) which demonstrates how a sustainable development to provide up to 1,200 dwellings and a primary school can be delivered on the site.

The following represents a brief summary of how the development of the land to the South of Witney is able to mitigate against the issues raised by the Council in paragraph 9.2.50 of the Local Plan.

A40 "Separation"

The previously submitted Transport and Highways Technical Note produced in May 2015 states that South Witney’s position in relation to Witney Town Centre presents opportunities to provide attractive public transport services such as extending the Route S1 buses.

The site is also well positioned to access existing movement corridors for pedestrian and cycle access

in addition to providing new routes such as a foot bridge over the A40. The site is well positioned for accessing facilities in the town. The A40 does not create a barrier to movement with the town centre, major employment areas, education facilities, and the new facilities coming forward with the adjacent West Witney development area, all being accessible in close proximity to the site. Most notably, all are on the same side of town and to the west of the River Windrush. Development locations to the east of the river, East Witney and North Witney, are heavily reliant upon the congested bridge street.

It should also be noted that the proposed new 'Garden Village' to the north of Eynsham will be separated from Eynsham itself and from the proposed West Eynsham SDA by the A40. Within the 'Vision' of the Draft Plan (Main Modification 9; paragraph 3.2) the Council have stated that the Garden Village will be "self-contained". Given the size of the proposed housing allocation (2,200 houses), it is unrealistic to suppose that there will not be shared use of services and facilities with between the Garden Village, Eynsham itself and the West Eynsham SDA. This is particularly true of education provision as, whilst there is a policy requirement (Policy EW1a) for the delivery of up to two onsite primary schools, there is no requirement for an onsite secondary school. Instead, a financial contribution towards secondary capacity is sought. In addition, whilst employment floorspace will be delivered on the site, it would not be feasible to consider that everyone who
lives within the Garden Village would also work there. There will be further reliance on the services and facilities in Eynsham in respect of health care and retail. Therefore, given the scale and scope of the Garden Village, whilst there will be a degree of self-containment, it will evidently not be fully self-contained. As a consequence, it will (and should) have a degree of connectivity with Eynsham. This demonstrates an inconsistency of approach with the Council not considering the A40 to present a significant barrier in terms connectivity between the Garden Village and Eynsham but dismissing South Witney on this very same basis.

Noise

The noise assessment undertaken at the site identified the A40 as a significant source of noise in regards to development of South Witney. In response, the Illustrative Framework Plan proposes an acoustic barrier along the northern edge of the site as mitigation against any noise impact from the A40. In addition, buffer zones have also been illustrated around the abattoir and waste water treatment works to reduce the impact of low frequency noise from these sources. These mitigation measures demonstrate that noise considerations would not preclude the development of the site for housing.

Odour

The Odour Risk Assessment Report concludes that a suggested odour separation of 200m from the centre of the abattoir and 350m from the centre of the Sewage Treatment Works (SWT) would be appropriate for mitigating the effects of odours on any development at South Witney. The buffer zones are achievable on the site and have been incorporated within the Illustrative Framework Plan for the site.

Landscape and Visual Impact

A Landscape and Visual Appraisal (LVA) was produced by Barton Willmore in May 2015. The LVA acknowledges that any development within the site would result in a technical reduction in openness due to the introduction of new built form, however, due to the containment of the site by reason of its low-lying position, vegetation structure and the proposed mitigation, the development as proposed within the Masterplan would not lead to significant adverse effects in relation to the wider area. Furthermore, due to the siting of the development and retention of fields, the rural pattern between Curbridge and Ducklington would be maintained.

As noted above, and as discussed in detail within the LVIA, the Council’s own evidence base has previously identified the South Witney site as having capacity for approximately 500 dwellings.

Conclusions

Despite having provided the Council with a range of environmental surveys and assessments which fully address the issues raised in respect of South Witney, the Council continue to raise concerns as set out in paragraph 9.2.50. As set out above, the site is a sustainable location for housing and can deliver in the short to medium term.

Accordingly, we invite the Inspector to consider the allocation of the South Witney site through this Local Plan.

Other alternative options for strategic growth at Witney Finally, we object to MAIN104 (paragraphs 9.2.51a-9.2.51b) which appear to promote the potential merits of a new longer-term option to the west of Downs...
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>We would suggest that the Local Plan should commit to seeking further financial contributions towards the Shores Green Slip Roads from any relevant proposed allocations or future windfall sites. The increased scale of development proposed at North Witney should enable provision of a financial contributions to the Shores Green Slip Roads, given that the slip roads are required to enable development at North Witney. Similarly, the proposed development at Woodford Way Car Park should contribute towards delivery of the Shores Green Slip Roads. The EWLC requests that Policies WIT 2 and WIT 2a are amended to require financial contributions from these developments towards the Shores Green Slip Roads. In addition, Main Modification 91, which refers to anticipated windfall sites, should also be amended to ensure that any windfall sites coming forward in Witney will be required to make a proportional contribution to the Shores Green Slip Roads.</td>
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<td>MM785</td>
<td>Walker, Smith, Summerfield</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>North Witney SDA Proposed Main Modifications (Main 103) to Policy WIT2 (North Witney Strategic Development Area) increase the North Witney SDA from 1,000 to 1,400 dwellings. Furthermore, Policy WIT2 goes on to state ‘the development to be phased in accordance with the timing of supporting infrastructure and facilities including the delivery of the West End Link and Northern Distributor Road.’ Paragraph 173 of the NPPF advises that ‘pursuing sustainable development requires careful attention to viability and costs in planmaking and decision taking. Plans should be deliverable...To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements, when taking account of the normal costs of development and mitigation, provide competitive returns to a willing land owner and willing developer’ My client questions the viability and deliverability of the North Witney SDA given the infrastructure burden required to deliver the quantum of development proposed within Policy WIT2, particularly given the expectation to deliver a new river crossing known as the West End Link 2 (WEL2). The deliverability of Policy WIT2, and in particular the supporting infrastructure requirements such as the WEL2, is imperative to the deliverability and soundness of the Witney sub-area strategy and the WOLP as a whole.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>Quantum of development and expansion of allocation site This proposed main modification is supported to reflect the proposed increase in housing numbers at the North Witney SDA from 1,000 to 1,400 homes and to provide clarification in relation to the delivery of the West End Link and northern distributor road. For further clarification however, we would suggest that the wording of paragraph 9.2.38 be amended to “…the development will require enable the delivery of the West End Link (WEL)...” Our previous submissions have indicated that the North Witney SDA could deliver 1,400 homes without the additional land to the west of Hailey Road.</td>
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The draft wording of Policy WIT2 states however that the allocation is for “about 1,400 homes”, which infers that the Council will take a flexible approach if the site could satisfactorily accommodate a higher number of units. This would help to address the concerns raised above regarding the ability of the Plan as currently drafted to meet the housing requirement for the Sub-Area and the District as a whole.

On that basis no objection is raised to these proposed main modifications in terms of the principle of including the additional land to the west of Hailey Road within the boundary of the North Witney SDA. Indeed, the potential opportunity to expand the Witney Community Primary School rather than provide a separate new school within the main site area is supported by our clients.

Revised paragraph 9.2.45 of the Local Plan explains the Council’s justification for increasing the quantum of development on the site and the landscape work that has been undertaken to inform this. We support the acknowledgement that the site is capable of accommodating a greater number of houses than that previously suggested within the ‘Kirkham Associates Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options’ (2012).

An independent landscape review of the site and the Kirkham report previously prepared for the North Witney Consortium (and previously submitted to the council) concluded that the Kirkham report had concentrated on the wider open countryside to the north of Witney. Although we would not disagree with the high sensitivity landscape of the wider setting, it is considered that the openly visible existing settlement edge exerts an urbanising influence into a greater portion of the site than the Kirkham report suggests. The openness of the site contrasts strongly with the high level of enclosure to the north beyond the site, in the vicinity of Poffley End and Hailey, ensuring the setting to these settlements would not be compromised by development of the site.

Through sensitive masterplan design it is therefore considered that a development of around 1,400 units can be readily assimilated into the landscape without eroding the setting to Poffley End or Hailey. To that end, and as indicated at paragraph 9.2.45 of the draft Local Plan, a detailed Landscape and Visual Impact Assessment (LVIA) would be submitted in support of any future planning application, to ensure that the scale of the development proposed and its arrangement is capable of being accommodated on the site without undue adverse impact.

Given the points raised above in respect of the Council’s position on the findings of the Kirkham report referred to at footnote 56 of the Plan, and given the Council’s acceptance of the findings of the Environmental Dimension Partnership Report (EP247_10b) prepared on behalf of the Consortium, it is considered that this document should also be referred to in the footnotes. This modification will provide clarity in respect of the Council’s altered approach to the site.

In light of the Council’s comments in respect of landscape and the recognition that the SDA is capable of accommodating an increased quantum of development, it is considered that the revised Figure 9.8 at Main 98 should be updated. As with the other allocations in the Plan it is recommended that the Figure is simplified to indicate the site boundary only with all other matters of detail to be agreed through the planning application process in due course (for example, removing the areas identified in the Legend).

**Phasing and Masterplanning**

Main Modification 102 in respect of phasing is broadly supported in so far as it provides additional flexibility in relation to the phasing of development at North Witney.
Paragraph 9.2.48 states that:

"As a large site, development of the North Witney SDA is likely to fall into a number of phases. There is already a current planning application on part of the site for 200 dwellings which is likely to form 'Phase 1' (subject to a comprehensive masterplan/delivery framework for the whole site)..."

The potential for the land between New Yatt Road and Woodstock Road (to which the extract above refers) coming forward in the short term as a first phase of development of the North Witney SDA is recognised and supported. The site, which is controlled by Taylor Wimpey, lends itself to early release without prejudice to the remainder of the site.

As well as land at Woodstock Road, Taylor Wimpey also control a substantial area of the main SDA site. Taylor Wimpey fully agree that any development on land between New Yatt Road and Woodstock Road should make proportionate contributions towards delivering the infrastructure requirements of the whole SDA, in addition to providing the first phase of the Northern Distributor Road. Taylor Wimpey is completely committed to ensuring that this early phase of development forms part of the wider SDA and does not prejudice its delivery, which can be secured through the use of planning conditions and s106 obligations as necessary.

Given the potential for the New Yatt Road/ Woodstock Road to come forward at an earlier stage and that the proposed new additional land to the West of Hailey Road is not within the control of the Consortium, the requirement for a “comprehensive masterplan” for the whole site is questioned. We therefore suggest that the reference to a “comprehensive masterplan” is removed from paragraph 9.2.48 and just the reference to a “delivery framework” retained in the interests of clarity.

The Council has proposed an additional criterion (ai) "comprehensive development to be led by an agreed masterplan" to reflect the comments in the supporting text discussed above. Whilst a masterplan for the main part of the site is supported, given the comments above it is suggested that this criterion should be amended to: "comprehensive development of the main part of the site between New Yatt Road and Hailey Road to be led by an agreed masterplan" (additional text underlined).

Criterion Di – Heritage

The Council have proposed a new criterion which requires “the conservation and where possible enhancement of the setting of the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas.” Given our comments above in respect of Policy EH7 it is considered that further amendment is required to this proposed requirement to ensure it is consistent with national policy.

Detailed heritage assessments have been undertaken on behalf of the Consortium in respect of heritage and these will inform, and assess, the detailed proposals as they continue to evolve.

Criterion L – West End Link

As with our above comments in respect of criterion Di, it is considered that this requirement should be reworded to reflect the requirements of the NPPF in respect of heritage. Furthermore, to ensure consistency with MAIN 61 discussed above, the Policy text should reflect that the North Witney SDA is to “facilitate the
Other Matters

We support the recognition of the potential of land to the north of the site in terms of the potential use of off-site measures in relation to sustainable drainage for the North Witney SDA.

As highlighted in the Development Framework Document (DFD) previously submitted, as well as mitigating the impact of the proposed development, the use of additional off-site attenuation features offers the opportunity to alleviate the downstream sewer systems which are currently over capacity.

The proposed main modifications to criteria (a), (b) and (i) to Policy WIT2 relating to the North Witney SDA are supported in principle to reflect the additional capacity of the site and possibility of off-site drainage solutions, as well as providing additional flexibility in relation to the proposed phasing of development.

For the reasons detailed above in respect of MAIN 40 (not repeated here), we also maintain a strong objection to criterion (n), which requires the developer to set aside 5% of the developable plots as custom/self-build, and request that this be deleted.

Sustainability Appraisal

Enfusion, on behalf of WODC, have prepared a Sustainability Appraisal Addendum Report in respect of the proposed modifications to the Local Plan. In respect of the increased scale and quantum of development proposed at the North Witney SDA, the Addendum advises that "the findings of the SA as reported in the Submission SA Report remain valid."

We support the conclusions of the Sustainability Appraisal Addendum Report. Given the scale of increase of the proposed SDA since the previous Sustainability Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments above.

Viability Assessment and Infrastructure Delivery Plan

To underpin the proposed modifications to the Local Plan, Aspinall Verdi have prepared a Strategic Development Area Viability Update (2016) on behalf of the Council. The Viability Update should be further updated to reflect our comments above in respect of custom/self-build housing etc.

As per the previous submissions on behalf of the Consortium, further consideration is required in respect of the necessary infrastructure required to be delivered by the site and whether this is to be funded by the SDA in isolation or whether contributions through Section 106 Agreements or CIL are to be sought from other developments in the area. We will continue to liaise with the Council in this regard in advance of the EIP.

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<td>Mrs Jacobs</td>
<td>2193</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN</td>
<td>delivery of the West End Link.</td>
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Ecology and Natural Environment

In all cases reference should be made to the District Council's ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.
The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

**North Witney**

This area was a core part of the historic royal hunting forest of Wychwood and the landscape retains traces of this earlier historic character. A number of the hedgerows to the north and west of Merryfield Farm are species rich and there is good habitat connectivity. This historic landscape character should be recognised and protected. If development proceeds and a net biodiversity gain cannot be provided and maintained on site, then off-site enhancements should be sought.

The proposed development will increase significantly the recreational pressure on local community woodlands – Foxburrow Wood (off Foxburrow Lane) and Breach Wood east of Hailey. If development takes place it should contribute funding to increase the future resilience of these sites. There may be opportunities to enhance local footpath connections.

The local water catchment feeds in to the Windrush. The management of water and flooding should be considered carefully and linked to opportunities for natural flood management, green infrastructure and habitat enhancement.

The site lies within the Wychwood Project area.

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### Education Comments

**Appendix 2 – Education Comments**

**N Witney Strategic Development Area- 1,400 homes**

Policy WIT2 includes a 2.2ha site for a new primary school. This should be 2.22ha. This is appropriate as 1400 new homes would be broadly in line with a new 2 form entry primary school being provided within the site.

The county council will continue to work with surrounding schools to plan school provision strategically, and seek added value from the eventual school solution, in particular by exploring the roles of Witney Community Primary School, the nearest current primary school, and Hailey Primary School, within whose current catchment the N Witney development lies, in meeting the needs of the new community. This will also take into account the education needs generated by other, smaller, housing developments, including the E Witney strategic site.

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**MM786 Oxfordshire County Council**

Amada Jacobs (OCC)  
Mrs Jacobs  
2216

> SECTION 9 - STRATEGY AT THE LOCAL LEVEL  
> Witney Sub Area > MAIN 103

'**Displacement of traffic on A4095**'. How would this stop anyone from the North Witney development going through New Yatt and North Leigh? This is already used as a 'rat-run' another 1,400 houses will make it worse. This road is used by cyclists, horseriders and runners, it’s dangerous now even more so with this development.

---

**MM787 Rachel Livingstone**  
Mrs Livingstone  
2229

> SECTION 9 - STRATEGY AT THE LOCAL LEVEL  
> Witney Sub Area > MAIN 103

‘**Does the masterplan have any formal planning status, such as adopted SPD, which would assist in securing**’

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**MM786 Oxfordshire County Council**

Amada Jacobs (OCC)  
Mrs Jacobs  
2244

> SECTION 9 - STRATEGY AT THE LOCAL LEVEL  
> Witney Sub Area > MAIN 103

al) comprehensive development to be led by an agreed masterplan;
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<td>Mr</td>
<td>Waters</td>
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<td>b) development to be phased in accordance with the timing of supporting infrastructure and facilities including delivery of the West End Link and Northern Distributor Road;</td>
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<td>The County Council has experienced significant difficulties in securing appropriate mitigation measures for the impact of strategic development areas where portions of the site have come forward as separate planning applications. To help reduce the occurrence of this issue we propose this additional text: The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.</td>
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<td>c) the provision of other supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development, and incorporating a comprehensive network for pedestrians, cyclists and public transport with links to adjoining areas including the town centre and other key destinations;</td>
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This raises a rather disturbing question about how the North Witney site, and indeed the plan, can possibly have been sanctioned through cabinet and its members without critical information having been completed or available for review by WODC officers or members.

Landscape and Ecology

Main 9, 16, 98, 101, 103 All conflict described below.

The North Witney site has been promoted for development for some time. There have thus been a number of landscape assessments regarding the site. All the reports (WODC commissioned landscape reports in 1998, 2007 and 2012) are consistent in maintaining that the gap between Witney and Hailey needs to be protected, the important farmsteads of Merryfield Farm and Downhill Farm should be protected, and the sensitive higher ground above 100m is of high landscape value and should be protected. The original plan paid little respect to these principles. However, in a desperate attempt to achieve financial viability, the modified plan seeks to disregard all of the previous landscape recommendations in repeated reports. The maximum housing recommendation of 800 houses has been abandoned; the proximity of Downhill and Merryfield Farms is not respected and new houses are planned on the higher ground identified as high landscape value that should be protected. Indeed, there is absolutely no screening of the higher land offered.

It is ironic that the lower ground, where screening offers little value, has been identified as an area to be screened, indicating a complete absence of local input. It is also noteworthy, that the only proposed screening is directly adjoining land of owned by party who has a beneficial interest in the development.

Landscape proposals in the modified plan therefore show a clear contempt for all the previous reports, a total lack of application of local knowledge and an inadequate understanding of what is really on the ground.

On ecology we are well placed to understand what is at risk. There is a remarkable and rich diversity of wildlife that is given no consideration or comment in the original ecology reports. Three types of owl, as well as lapwings and a wide range of protected amphibians (due to the wet nature of the ground) live on the adjoining land and these feed and breed in the proposed development areas. The modified plan does more than simply erode the buffer zone to protect these species - it almost completely removes it.

WEL

Main 20, 102, 217

Firstly, it should be stressed that the overwhelming majority of local residents cannot understand what advantages WEL can possibly deliver. Taking traffic from one highly congested area of the A40 and diverting it to another highly congested area of central Witney solves nothing.

On process we feel strongly that all the reports showing that traffic would increase by over 200% on Hailey Road seem to have been suppressed as they were only released as a result of an FOI. Indeed, this key fact was never mentioned in any of the narrative and appears to have been concealed in the consultation process. Having been made aware of the sensitivity of this issue, it is therefore extremely disappointing that yet again traffic documents were up-loaded well after the consultation process had started.
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<td>MM109</td>
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<td>jon midwinter</td>
<td>Mr Midwinter</td>
<td>272</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>The modified plan provides no information whatsoever as to the route of Northern Perimeter Road. Both aforementioned farms keep livestock and the route of NPR has significant implications for the farms and their animal husbandry. I have questioned your team directly as to the route of NPR but to date no one can give me a definite answer. In light of this, I fail to see how it can possibly have been costed if the route is unknown. It is therefore impossible to comment on the impact of WEL and the NRP, rendering the consultation on WEL meaningless and undemocratic and therefore a breach of process. It is also noted that the original plan indicates the importance of completing WEL before the development commences. The proposal of an additional 400 houses logically heightens the importance of completing this infrastructure prior to the construction of houses. It is therefore illogical that the commitment to construct WEL upfront has been abandoned. That this will be constructed at an &quot;appropriate time&quot; puts no responsibility on the developer and suggests it may never be built (as has happened before in WODC). Sewerage Little or no reference in documents - why is this? The modified plan makes no mention of the plans for additional sewage. Although it is understood that the waterworks itself has adequate capacity, questions appear not to have been asked about the network to deliver the effluence across Witney. Every year following heavy rainfall, sewage escapes onto Hailey Road. The ageing and constricted pipework that takes it to the sewage works to South Witney treatment works simply does not have the capacity to take the volume of sewage. As director of an environmental engineering company that specialises in designing sewage infrastructure, I am confident in estimating that coping with the increased volume of sewage from the additional 1400 houses is a significant infrastructure challenge. It is probable that many of the ducts under Witney would have to be upgraded, costing many millions of pounds. (When Woking was upgraded in a similar manner it took over two years to compete and caused extreme traffic congestion for the entire period.) It is therefore staggering that this key issue attracts almost no professional comment, as I would assume that a sewage network upgrade is essential in order to deliver the project.</td>
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<td>MM226</td>
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<td>Ian Hogg</td>
<td>Mr Hogg</td>
<td>431</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub</td>
<td>The one specific proposed site I object to is Witney North. This area of land has inbuilt drainage problems that the proposed technical drainage plan designed to alleviate these problems are unlikely to work. In the event they don’t, the natural drainage of the area will cause any flood waters to cascade into properties on the Hailey Road. This has happened in the past and the loss of natural surface absorption of rain water because of the proposed 1,400 houses will worsen the problem. Further, unless both relief roads are built then traffic congestion will be even more severe.</td>
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<td>Janet Coleman</td>
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<td>Coleman</td>
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<td>Area &gt; MAIN 103</td>
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<td>MM285</td>
<td>willow</td>
<td>mr french</td>
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<td>500</td>
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A. This will only be a feeder road to Marriott's walk car park.

B. There are too many sets of traffic lights and pedestrian crossings to allow it to be a through road.

C. West End will become a bigger 'rat race' than it is today, and it could start to have higher toxic air readings than Bridge Street. (See section five).

D. The building of this site will also cause extra flooding elsewhere (upstream from the bridge), there is no fool proof way shown to collect extra surface water.

The existing drainage system as it stands now cannot cope, plus the fact that our flood plains are slowly being built upon. Witney bridge is the bottle neck in the system.

will not be able to take the extra volume of flood water. More properties will flood because of this scenario.

3. As council officers you need to obtain enough money from the government’s new road building funds, to build the Shores Green slip roads first.

A. There is no need to be jealous about the profit the land owners will make. We need this area of ground. Both for housing and infrastructure.

B. I think it’s also safe to say that people living on this new housing complex would chose Oxford or beyond, rather than Witney for employment.

C. Lets face it, it will be near a railway station. It will be on a main bus route. It could keep the extra traffic generated away from Witney streets.

4. Further details and investigations need to be looked into regarding the extra influx of houses added to the original plans. These are the houses that are due to be situated on the left hand side of Hailey Road, as you go towards Hailey from Witney. The added extra to the original north Witney plan.

A. These green fields need natural drainage, not a top coating of concrete. The reason being, these fields contain natural aquifers which in turn slowly feed the springs that are situated in the grounds of Willow Farm, Crawley Road, Witney.

B. If a 'SUDS' surface water draining system is introduced on this housing complex site, rain water could find its way more quickly into the aquifers and cause flash flooding on the land behind Bridge Street.

C. This amount of extra water could have devastating effects, when added to the extra water that will quickly find its way into the Hailey Road drain, when the proposed 1000 (proposed) extra houses are built.

D. We need to protect our older house’s and buildings, mainly in Bridge Street from possibly unforeseen
flooding which could be greater than levels obtained during the 2007 floods. These old houses, with some of them possibly dating back to the 1600’s are part of the heritage of Witney.

5. Lastly, this objection should be the major stumbling block which should put all idea’s and thoughts about building 1400 houses to rest.

A. Since the 1930’s Witney has expanded beyond control but, I will only mention one small stretch of road = Bridge Street. This small stretch of road was once part of the A40, which as you well know stretched from London to Wales. In the 1930’s the Staple Hall section was widened and in the 1960’s the Bridge was also widened. This was done with two thoughts in mind, the extra traffic travelling through witney and the size of the motor vehicles.

Nothing at all has been done to the centre section, which still stands the same as in Victorian days. This might have been OK in the 1960’s, but times have changed.

B. Traffic counts done over the last 15 years tell us the volume of traffic that passes through Bridge Street daily, and Oxfordshire County Council have estimated that traffic will increase along this small stretch of road between 4% and 7% once the West End slip road is built. We could be talking in terms of 30,000 vehicles per day. This situation could or possibly would bring the town to a stand still.

C. Now we need to bring into focus ‘AIR QUALITY CONTROL’. As I am lead to believe WODC has no plans or guide lines as to overcome this situation. Monitored air readings tell us that each and every day Government guide lines in Bridge Street are broken, and in some instances they have been over double the limit.

D. You, the council officers need to get your ‘act’ together now to try and put an Air Quality Plan together. By doing so you might be able to meet the new plans that DEFRA will be presenting to the government, in the early months of 2017.

The proposal for the original 1,000 homes, let alone the revised figure of 1,400 takes no account of the impact of traffic between Witney and North Leigh along the New Yatt Road, or into Witney.

Heading towards North Leigh, this narrow country lane is often used by horse riders, cyclists and runners. There is no footpath. I do not believe that adequate thought has been given to the increased volume of traffic resulting from the provision of new housing.

Any commuters having to pass through Witney will add to the already, at peak times, clogged up traffic system at the double roundabout.
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<tr>
<td>MM341</td>
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<td>Sir Brendam Gormley</td>
<td>Sir Gormley</td>
<td>642</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>The volume of houses proposed is simply too great and if any are to be built, should be restricted to the 200 proposed between New Yatt Road and Woodstock Road. I am a local resident of Hailey. I attended the Council Meeting which approved the Modified Plan now subject to consultation. I was shocked that the council refused to consider and voted down alternative sites in Carterton where there is a real desire for new homes. However all the councillors who spoke accepted that the North Witney scheme was already the weakest and most problematic element in their plan, and this was even before the increase now proposed. The main reason seemed to be that this would mean a further delay in what has already been a costly and drawn out exercise. But whose fault is that? What is striking in the modified plan is that some of the objections raised before this expansion have not even now been addressed. * Transport congestion: WEL SECTION 217 There is no proper study of increased traffic, and you will be aware that the bridge in Crawley that takes some of the relief traffic is unsafe and will need to be closed or rebuilt. Shockingly the commitment to construction of the WEL is now downgraded from &quot;in advance&quot; to &quot;timely&quot;. This means nothing and does not indicate who is responsible for the decision. Council members actually discussed their poor record in infrastructural development. * Drainage: 100 -103: The permeability calculation of 40% remains the same despite the increase in housing and there is no compelling evidence for this calculation. Worse the plan still has statements in 103 (e) &quot;may include off site solutions&quot; - demonstrating that the whole issue of flooding has yet to be properly resolved. It is not acceptable just to publish a long list of possible solutions. * Sewerage: This issue was raised in the first consultation in Hailey Village hall in 2015 and its still not adequately addressed. How will the extra volume reach the sewerage works? * Cost: It is not clear to me as a resident and council tax payer what is the true cost of the North Witney Scheme, when all the necessary infrastructure is included, and who will pay. Will this be made clear before the scheme is agreed. My conclusion is that the Council continues to extend the North Witney option because they must realise that the expense of any necessary infrastructural development will be so costly they need to allow the developers more housing. I think that a more modest scheme that could infill from Witney upto the proposed relief road running from the Canon Pool garage on the Hailey Road to the Kings school on the New Yatt Road is the best solution coupled with additional housing elsewhere, especially in Carterton where the Mayor and Council members would welcome it. The lack of access to timely and complete documentation, which is supported by relevant evidence, firstly for the Council and Cabinet and now for the public to make their recommendations could make this whole plan process liable to judicial review.</td>
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<td>MM349</td>
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<td>Sue Ayers Ayers</td>
<td>Ms Ayers</td>
<td>652</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub</td>
<td>. . . land to the north of Witney, which falls within Hailey Parish, represents a sustainable option for future strategic growth. As such it is proposed that this site is allocated 1400 homes. This proposed development which has increased from an initial recommendation of 750 homes to an unbelievable number of 1400, ignores all previous considerations and proposes building modern properties without double garages and without decent gardens as that is the only possible way it can be achieved. Can</td>
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<td>MM6</td>
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<td>peter malin</td>
<td>Mr Malin</td>
<td>7</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 103</td>
<td>you say with any certainty that each property will even have space to park two cars off the road. A wall of trees surrounding such overdevelopment does not make it any more rural. In the guidelines you produced it states ‘development of small fields and over development of individual plots, leading to continuous ribbon development, should be avoided.’ Yet that is exactly what you are proposing. In previous council statements there was a specific understanding that open space between urban developments like Witney and hamlets like Hailey should be maintained to protect their individual rural nature. The assertion in the submission that 1400 homes can be delivered on site whilst ensuring an acceptable degree of impact in the landscape is utterly disingenuous. There can be no way that 1400 ‘units’ can be delivered without building either multi-storied properties or one-up one-down ‘cottages’ totally at odds with the landscape report which deplored the expansion of settlements into open countryside creating ‘suburbanisation’ of rural settlements. As far as I am aware most of the tree planting in this area has been done by locals under the auspices of the Wychwood Project. I am interested to know what the WODC’s plans are for tree planting on these developments.</td>
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On many occasions over the past 30 years I have submitted my comments on successive proposals to develop the land between Hailey and New Yatt Roads, most recently in 2014. Never yet have I received a response explaining how the issues I have raised might be addressed; this time, I hope I shall be luckier. Nothing I said in my 2014 submission has changed; the Revised Plan simply makes things a whole lot worse. I make no excuse, therefore, for resubmitting my previous letter, with some further points that have since occurred to me. This is what I said in 2014:

When I bought this house in 1986, my decision was clinched by the view: an idyllic vista of fields and copses rising gently to a tree-lined horizon. However low I am feeling, when I open my curtains each morning this view lifts my spirits. So beautiful was it this spring that, although I am not an artist, I was moved to paint it. I cannot believe that, yet again, I am having to defend it against the developers.

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I'm sure my previous correspondence is filed somewhere, and I can say little more than I have said on previous occasions. Yes, I know people need houses to live in; yes, I know that since this little patch of beauty is in my backyard, I must inevitably be motivated by selfish considerations. But someone must defend the English landscape against the creeping destruction that has already blighted so much of Witney's green fringe.

This beautiful landscape isn't just a view. It's a place where people walk, relax, breathe fresh air. In the middle of it, you are surrounded by nothing but fields, trees and sky, with not a building in sight. It is home to an enormous range of wildlife; I assume that surveys have been conducted by the appropriate organisations to determine just how many creatures' habitats would be destroyed by the proposed development. As well as the more familiar birds and animals you would expect to find here, it is also home to buzzards, red kites, owls, cuckoos, long-tailed tits, goldfinches, willow warblers and, in the winter, flocks of redwing and fieldfare. I
guessthere are frogs, toads, newts and grass-snakesin the shadier, damper areas, and my garden has been visited by hedgehogs, bats, deer and, on one memorable occasion, a hare. In addition, the range of insects is diverse and beautiful, from butterflies and moths to bees, beetles, lacewings and shield-bugs. Yes, people need somewhere to live, but so do all these creatures; more so, one could argue, in the modern world.

The fact that the current threat of development here is vaguely deferred to some future time “after 2021” paradoxically makes it more urgent to act now, though I assume, perhaps naively, that there will be many further consultations during the next six or seven years. This piece of land has aesthetic value, amenity value, landscape value, habitat value; why, then, must its economic value to developers be allowed to outweigh all these?

There are still sites in and around Witney that are less environmentally sensitive than this. If it were a building, it would have a preservation order on it. Once it’s gone, it will never return; then it will be the turn of the adjacent patch of land to be swallowed up, and so on and so on till Hailey and Finstock are mere suburbs of Witney, with a grim urban corridor leading to Charlbury.

Is this what you want your legacy to future generations to be?

In addition to the above, I should like to add two points. Firstly, this area is subject to flooding, which will inevitably get much worse as a result of the proposed urban sprawl, whatever attempted mitigation measures are put in place. Secondly, since I wrote in 2014 the traffic situation on New Yatt and Vanner Roads has become well-nigh intolerable. In particular, on-street parking has increased exponentially, causing enormous problems at peak times, with extremely dangerous situations at every junction. This is exacerbated by the increasing number of delivery vans on the roads. No amount of new link roads or relief roads can possibly solve these problems, with such a potentially huge increase in two- and three-car-owning households on the vast estates that are proposed.

As far as I know, this country is still a democracy, so I LOOK FORWARD TO BEING INVITED TO A PUBLIC MEETING IN THE NEAR FUTURE TO DISCUSS ALL THESE ISSUES. In the meantime, I invite you to visit me at the above address to see for yourselves why, if and when the diggers move in after 2021, I shall feel, quite frankly, suicidal.

Stagecoach continues to maintain its objection to the proposed Strategic Development Area North of Witney, with the exception of land east of New Yatt Road. The allocation is unsound as it is not sufficiently evidenced that the site is deliverable without giving rise to unacceptably severe impacts on the local highway network, and in and around Bridge Street in particular. This seriously threatens the efficient and reliable operation of every local commercial bus service serving both Witney and Carterton, and thus directly prejudices the ongoing provision of realistically attractive, reliable travel choices to existing and future residents. The allocation is thus contrary to specific Policies within NPPF, in particular 17, 29, and 32, which require that development giving rise to such severe residual unmitigated impacts should be restricted by Policy or refused if proposed.

The proposed allocation cannot deliver improvements at Shores Green and through the West End Link Road without third party land and funding, that are required merely to prevent the traffic impacts materially aggravating existing severe congestion within the town.
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| MM390       | Hailey CE Primary School       | Sue Haywood     | Ms Haywood       | 846        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 103 | Most of the proposed allocation, east and west of Hailey Road, also remains a significant distance from current commercially sustainable bus routes. It would be difficult to extend bus services to the site, which would be sufficiently frequent or serve such destinations (mainly within Oxford City) that would make them relevant and attractive to enough paying customers to allow them to be sustainable on a commercial basis in the long term. The addition of another 400 dwellings does little to alter this equation, given the extent of the proposed allocation and the nature of the urban structure and highways network that both have an important bearing on how such services could be designed.

The dependency of the allocation on mitigations outside the ability of the promoters to deliver can be resolved through the modification of Policy WIT2 to make allow for the delivery of development above clearly evidenced traffic generation thresholds to be conditional upon the delivery of the Shores Green Slip Roads, and the West End Link Road, through the imposition of appropriately worded “Grampian” conditions.

Stagecoach, in the light of the issues we raise above, proposes the following modification to the Plan to make it sound:

“b) development on the larger part of the site between New Yatt Road and Woodstock Road will be brought forward subject to and following the delivery to be phased to come forward in the period post-2021 in accordance with the timing of supporting infrastructure and facilities required to ensure the traffic impacts of the development at no point materially exacerbates existing highways conditions at and in the vicinity of Bridge Street and its approaches. This infrastructure will include delivery of the West End Link and Northern Distributor Road, and all-movements junctions on the A40 at Shores Green and at Downs Road; and such other interventions as may be separately required and identified in any Transport Assessment/s submitted in support of any application/s for the site or any portion of it. Phased delivery, governed if necessary by “Grampian-style” conditions, may be used to achieve this.” |

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| MM390                | Hailey CE Primary School     | Sue Haywood      | Ms Haywood       | 846        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 103 | The suggested provision of a 2FE school on the North Witney Strategic Development (or expansion of WCP school) not only has longer term effects arising from competition for pupil places, but also directly constrains the availability of CIL funding available for education and related investment in the shorter term for Hailey. We understand that the education CIL funding would be likely to be “contained” within this specific development for the 2FE school and therefore not available to Hailey Neighbourhood Plan for investment in Hailey School’s provision. This, along with the changes in Section 106 funding criteria seriously affects the funding streams available to support our school’s place in the local community.

More importantly, the Local Plan does not fully explore the positive contribution and solutions that existing local rural schools could offer the WODC Local Plan and strategy.

For example, Hailey CE Primary School:

* has strong performance and inspection results (Ofsted and SIAMS), and pupil, parent and staff satisfaction surveys, making it a school of choice. This supports the WODC Plan aspirations to support local employment, improving rates of education, and protecting and enhancing local established facilities and infrastructure.

* is currently only 0.5FE but has extensive grounds and, unlike many of the schools in the area, has opportunities to expand physically. The need to protect the character and ethos of the school, and initial consultation with OCC Schools Planning, would suggest a 1FE would be an appropriate growth model. This would have the benefit of providing WODC Plan with a realistic, timely and achievable solution to meet some of the pupil place needs emerging from the first phases of the various and many Witney-wide developments in the more immediate future (and ongoing). For ourselves, it would enhance the income, and therefore
protect the viability of the school and its role in the local community, for the longer term; particularly important given the need to offset the potential impact of the proposed development of the 2FE school so locally to us.

* has extensive grounds and its location, being close to various proposed developments in the WODC Local Plan and with footpaths that link to Witney town adjoining the school site, both of which offer innovative transport solutions, including low and zero carbon footprint options. Integration of these solutions into the plan, conjoined with expansion of Hailey School to 1FE, would enable provision of a Witney-wide education infrastructure solution without the usual attendant scale of transport and traffic considerations. Upgrade of the footpaths to safe cycle routes, installation of cycle racks, school support and facilities for community and pupil provision of cycle proficiency education, provision of a "drop off circle" to significantly reduce parking at peak times in the village, would all be examples of the innovative infrastructure that could be offered, meeting many of the principles and objectives outlined throughout the WODC Local Plan.

* has an integral role as a village school in the wider community, which we are keen to further enhance. By including Hailey School in the infrastructure planning for the WODC and Neighbourhood Plans, many of the cohesive solutions would also benefit the community, and thus support the principles and objectives in the WODC Local Plan, most specifically the need to improve the quality of life of local communities, the protection of existing facilities and infrastructure. For example, investment in extending the school to 1FE will help protect the viability of the school for the village, protecting house value and local pupil places (enabling walking/cycling to school for families); furthermore, new building facilities and school sports facilities can be designed with out-of-hours community use in mind. Investment in cohesive transport solutions for the school could enable improved cycle pathways for the wider Hailey Parish community, reduced traffic congestion (with a drop-off loop), and out-of-school hours opportunities such as cycle proficiency education/training facilities and safe access and parking spaces for sports etc.

To reiterate - for all these reasons, we submit that this specific modification, along with other developments in the Witney-wide area, has not given due regard to a number of principles underlying the WODC Local Plan, such as protecting and improving the quality of life in, and facilities in local communities (in this instance - Hailey Parish), nor has it maximised the opportunities to achieve some of its stated aims, such as the timely provision of appropriate supporting infrastructure, including the education pupil place needs arising from imminent Witney-wide developments and the first phase of this development in question.

Witney Sub-area

4.24 Transport is a key issue for the Witney sub-area which contains a number of important and well-used routes including the A40 the A4095 and A415. Although Witney has the best road connections and bus services in the district context, traffic congestion is a significant problem due to high car use particularly for journeys outside of Witney16.

4.25 Currently access to the A40 at Witney is relatively limited and the route is also heavily congested at peak times between Eynsham and the edge of Oxford.

4.26 An award of £35m through the Local Growth Fund will be used to deliver improvements comprising a new park and ride at Eynsham and an eastbound bus lane from the park and ride toward Oxford. Longer-term improvements to the A40 have also been identified although funding is yet to be secured17, and is largely dependent on the delivery of the Garden Village SDA.

4.27 Such issues could clearly slow down delivery on the SDAs in Witney, ease. This parcel is not dependent on the delivery of the Shores Green slip roads and we note the inclusion of the Stanton Court Road site within the allocation is to assist in providing early revenue for the developer to
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help fund the infrastructure needed to bring forward the larger Cogges Triangle site19. In terms of funding mechanism, we don’t take issue with this.

North Witney SDA (MM103)

4.37 Capacity: The Submission Draft Local Plan identified 1,000 homes at North Witney SDA. It was previously acknowledged by WODC that whilst 1,400 homes were achievable on this site it would present a ‘very high density’ of development22. However, following the requirement to increase their housing requirement WODC have increased the North Witney SDA to 1,400 homes in the Proposed Modifications. The boundary of the SDA has been extended to incorporate a 4ha parcel of land west of Hailey Road. The increased capacity also takes into account a modest increase in the extent of the developable area to the north and slightly higher density assumptions23.

4.38 Representations to the Submission Draft Local Plan by Boyer on behalf of the NWLC identified that the 1400 capacity of the SDA can be achieved through the delivery of 200 homes at the Woodstock Road site (14/01671/OUT); 1,000 to 1,200 homes on the main bulk of the site; and 100 homes on the 4ha site to the west of Hailey Road.

4.39 Unlike our approach with the SDA in Chipping Norton, we have not had sufficient scope to scrutinise the capacity of this site in detail and therefore we are not in a position to take issue with these figures and therefore we take them at face value.

4.40 Ownership: (Map attached) The bulk of the North Witney SDA is controlled by the North Witney Land Consortium (NWLC) which comprises: The ‘Middlefield Consortium’ (comprising of Taylor Wimpey, Jack Moody Limited and Cranbrook Construction) (blue – Figure 3); All Souls College (access across the school land is secured by a deed of easement entered into at the point of transfer to the school) (orange); Meridian Strategic Land (pink); and Gleeson Developments (green). The additional land parcel off Hailey Road is within the ownership of Persimmon Homes Limited.

4.41 Infrastructure: The North Witney SDA is dependent on the delivery of the West End Link (WEL) (a second river crossing). It will also provide a new Northern Distributor Road through the site connecting Hailey Road to New Yatt Road and onto Woodstock Road.

4.42 The Proposed Modifications identifies that delivery of the bulk of development in the medium to long-term would:

* Help to ensure that housing delivery is provided evenly across the whole of the Local Plan period;
* Ensure the transport impact of the scheme is minimised by allowing for the new A40/Down’s Road junction and A40/Shores Green improvement to come forward first;
* Allow time for the east and west Witney scheme to come forward in advance (and thereby avoid market saturation in the Witney area); and,
* Allow for the West End Link element of the scheme to be phased in appropriately as an integral part of the development25.

4.43 Delivery: The Proposed Modifications indicate that the development of the North Witney SDA is likely to fall into a number of phases and that because of the lead-in times associated with larger strategic sites, it is likely that “the majority” of the site will come forward later in the plan period after 2021 unless delivery can be accelerated. We agree that the delivery is likely to take place in phases and later on in the plan period.
4.44 We believe that the first phase will be 200 homes on the Woodstock Road site with first completions in 2021-22. This site is separate from the main bulk of the site and not dependent on the WEL and Northern Distributor Road coming forward first.

4.45 We are also of the view that the Hailey Road site (100 homes) could come forward without the highways infrastructure, but given that there is no planning application for this site and the parcel of land has only just been included within the allocation as part of the Proposed Modifications, we have identified first completions the following year in 2022-23. Irrespective of when it starts, we accept that it will be complete within the plan period.

4.46 With regards to the remainder of the North Witney SDA (1,100 homes), and noting that the Proposed Modifications anticipate the Shores Green improvements and East Witney SDA coming forward before the majority of the North Witney SDA, we have assumed first completions around 2024-25.

4.47 This part of the site is within three ownerships (The 'Middlefield Consortium' (comprising of Taylor Wimpey, Jack Moody Limited and Cranbrook Construction), Meridian Strategic Land and Gleeson Development. Given that the Meridian Strategic Land parcel is currently land-locked, it would not be unreasonable to assume that just two developers would be delivering on this part of the site at the same time. Overall, we have assumed 100 units per annum of this part of the site would be reasonable output given their might be scope for three developers and noting NLP suggest a build out rate of 105 units per annum for a site of this scale (i.e. over 1,000 units).

4.48 Conclusion: For the SDA as a whole, which the Council expect to deliver 1,400 units over the plan period, we expect that this will reduce a maximum of 1,000 units given the multiple ownerships, infrastructure requirements and phasing of the site.

North Leigh Parish Council (NLPC) objected to the draft Local Plan submitted in 2014/5 in particular in respect of the proposed allocation of 1000 dwellings at North Witney.

The proposed modifications now include a proposal to increase that allocation by 40% to 1400 dwellings, without supporting landscape highway and drainage impact assessments being undertaken.

NLPC supports the Main Modification Main 9 and the overall Vision that expresses the need to protect Witney’s landscape setting and Main 12 (Policy CO15) seeking to reduce the adverse impacts of climate change and in particular flood risk.

In the opinion of NLPC the allocation of 40% more dwellings at North Witney without any supporting evidence to show how such an enlarged development will impact on the local landscape, local roads and impact on local surface water and foul drainage issues where known problems already exist without 1000 extra dwellings let alone 1400 dwellings being built as proposed exposes existing residents here and in North witney exposed to a variety of risks - additional traffic in North Leigh and flood risk in North Witney. This lack of suitable assessment, in our opinion, makes this proposal unsound and not legally compliant.

Further consideration should be given to extending Witney westwards off Downs Road where significant proposals are already planned and where better road links to the A40 are planned both at Downs Road interchange and possibly Minster Lovell; we understand that Carterton is seeking more housing and although it is one of the three main towns and the second largest town in WODC, Carterton has no new SDA allocated which seems an oversight having regard to the key main three towns policy at the heart of the overall Local Plan.
We support the general principles of development restated in Main 16, but the North Witney proposal - whether 1000 or worse 1400 dwellings, fails on various counts to satisfy some of those key principles - it is not a logical complement to the existing scale and pattern of development and the character of the area. It has a potentially harmful effect on existing occupants and damages rather than enhances and protects the local landscape; it significantly increases the risk of flooding both from surface water and foul water drainage as the existing systems are known to be inadequate; it will generate significant additional traffic likely to rat run through North Leigh via the New Yatt Road which will link to the northern distributor road and if the West End Link Road is built yet more traffic from West Witney and beyond will be able to take the same short cuts and increase traffic flows in our village to an unacceptable level. In these respects the modifications are unsound and these elements legally non compliant.

Main 68 seeks to protect Landscape impact by ensuring appropriate landscape assessments but whilst one has been done for the original proposal of 1000 dwellings one has not been done for 1400 as now proposed.

Main 75 (policy EH5) seeks to reduce or avoid flood risk - the North Witney proposal appears to increase these risks - as such it must be non compliant with Main 75.

If the Inspector were minded to approve the North Witney allocation then we would request as part of the wording in one or all of the policy modifications relevant to North Witney namely Main 97,101,102,103 and 113, there should be a requirement to provide suitable traffic calming measures in various locations along the New Yatt Road to discourage rat running from North Witney through New Yatt and North Leigh. At present no provision is made in the respective policies nor any Modification, and as such the impact of the proposal, as yet not suitably assessed, makes it unsound.

In addition as part of a wider strategy of enhancing cycling provision between Witney and the railway station at Long Hanborough, all developments in settlements along the A4095 starting with North Witney, North Leigh, Freeland and Long Hanborough should contribute towards improving the local road network and in particular upgrading the cycle path between Witney and Long Hanborough especially the section of cycleway missing between the Common Road and Park Road junctions at North Leigh - the relevant modifications are Main 59 (sustainable transport T1) 150, 170,172,173,175 and 183 (Policy EW2). This element of the Plan needs to be sounder and more compliant by making suitable provision for this important cycle link to encourage more cycling and fewer car journeys between Witney and Long Hanborough railway station.

NLPC is keen to see the Local Plan adopted as soon as possible to enable WODC to regain control of the planning system to avoid losing appeals or being forced to grant consent on unsuitable sites as has been the case on two sites in North Leigh amounting to over 110 dwellings - both of which will access directly onto the New Yatt Road with similar traffic issues that North Witney will cause. However selecting the best sites with least impact remains paramount.

The approach given to the identification of individual allocations (as set out under the relevant sub-areas within chapter 9) and their associated policies is strongly supported.

Where relevant, individual policies require the provision of schools as part of the wider allocated development, including the number and size of schools required (for example Main Modifications 103, 140 and 155). Where the proposed housing numbers do not trigger the need for a new school, the policy requires appropriate provision of or a contribution to the necessary supporting infrastructure (for example Main Modifications 128 and 131). This approach is supported by the EFA.
You will have no doubt taken account of the key strategic policies to reiterate this position, including securing developer contributions through s106 and CIL, but it would be helpful if they were explicitly referenced within the document. In particular, as below:

The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).

The EFA support the principle of safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. Support is also given for the siting of schools within the allocated sites in locations which promote sustainable travel modes for pupils, staff and visitors. There is also a need to ensure that the education contributions made by developers through the Community Infrastructure Levy are sufficient to cover the increase in demand for school places that is likely to be generated by a development. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.

West Oxfordshire District Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on ‘Planning for Schools Development’ (2011) which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system.

Overall, the EFA commends the main modifications proposed. They seek to ensure that adequate future education provision across the district is provided.

**MM424 Natural England**

Marc Turner  
Mr Turner  
939  
> SECTION 9 - STRATEGY AT THE LOCAL LEVEL  
> Witney Sub Area  
> MAIN 103  

North Witney SDA  

Our previous comments made in relation to this SDA still apply, we note that the allocation has increased from 1000 to 1400 houses, and the area of the allocation has increased. We note that ‘an acceptable degree of impact in landscape terms’ is anticipated: we advise that this allocation would have to follow the recommendations of a full Landscape and Visual Impact Assessment (LVIA) in order to create a development which is both sustainable and acceptable in terms of its impact on the wider landscape given it falls within the setting of the Cotswolds Area of Outstanding Natural Beauty (AONB).

It should be ensured that an increased housing density still allows for provision of sufficient Green infrastructure, since the land currently provides a recreational resource. The potential for hydrological impacts on Duckington Meads SSSI will need to be assessed.

**MM456 Sport England**

Raymond Cole  
Mr Cole  
1120  
> SECTION 9 - STRATEGY AT THE LOCAL LEVEL  
> Witney Sub Area  
> MAIN 104  

Please see also Sport England’s representations on MAIN 50. The policy WIT4 and supporting text suggests that the land should be allocated for development, ‘subject to relocation of existing sports pitches’. Sport England considers that this wording on its own may not be sufficient to secure satisfactory reprovision of these community sport facilities. Further amendments are required to the policy and these are suggested below. If the pitches and ancillary facilities are to be relocated then the Council should allocate a replacement site for these through the local plan and a site should be identified in the modifications to the plan. If areas of the golf course are to be lost then these should also be replaced and the Council should identify a site within the Local Plan.
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<tr>
<td>MM457</td>
<td>North Witney Action Group NWAG</td>
<td>North Witney Action Group (NWAG)</td>
<td>Mr</td>
<td>Neyroud</td>
<td>1331</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
<td>Indeed, WODC has already revealed a solution in MAIN 104 to the weakness of continuing to include the remote and “complex” (MAIN 217) North Witney SDA when it commits to considering several other sites (including the strategically better located South of Witney SDA) at a subsequent review of this Local Plan. Note: On 10th October 2016, the Lowlands Planning Committee gave permission for 257 houses at the land to the west of Downs Road site (Application No 16/01450/OUT).</td>
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<td>MM743</td>
<td>East Witney Land Consortium</td>
<td>c/o Carter Jonas</td>
<td>c/o Carter Jonas</td>
<td>1782</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
<td>The EWLC notes that in paragraph 9.2.49, the Council states that several other options have been considered for development. In light of the fact that the Plan has no flexibility in terms of delivering sites to meet the District’s housing requirements, the EWLC suggests that the Plan should be further modified to allocate further sites for development around Witney, the most sustainable settlement in the District. In particular, we believe that further consideration should be given to the Land off Jubilee Way.</td>
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<td>1783</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
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<td>MM755</td>
<td>Bushey Ground Consortium</td>
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<td>-</td>
<td>1898</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
<td>We have made presentations to you on behalf of our clients, the Dowley, Conlon, Brooks, Williams and Huntoon families over a number of years during the ongoing review of the Local Plan, seeking to have their land at Brize Norton Road/Bushey Ground, Minster Lovell allocated for housing, including your most recent SHLAA call for sites consultation in February this year and put forward their land as being available and suitable for such a use. Previous ref 262. We note that in the latest version of the Draft Plan a site for 85 dwellings has been proposed on a back land site adjoining the north west edge of the village and that following a planning application this site has been granted consent in the last month. We believe the Council may find the need to allocate more dwellings in sustainable settlements like Minster Lovell and our clients site is both suitable and available. There is an existing access via Bushey Ground which already serves a number of existing dwellings and businesses. We realise this site is not large enough to be seen as a strategic one, but given the draft plan modifications have now included/identified a number of non-strategic sites ranging from 25 to 300 dwellings, we believe this site should have been included as well – so Modification Main 26 (para5.30b) should be amended to include this site and likewise Main 90 Witney sub Area table 1 and again Main 115. We anticipate the Council may find there will prove to be a need to provide more deliverable sites like this because the larger sites are either not deliverable quickly or worse not at all within the Plan period. In Main 104 paras 9.2.51 a,b and c - our clients support the principle of extending development westwards from Downs Road and linking Downs Road to B4047. There is a four way link interchange proposed to the A40 at Downs road and possibly another may be provided at the B4477 at Minster Lovell. Please take this letter as a repeat of our earlier representations – our client’s land is still available for housing</td>
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<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson</td>
<td>c/o Barton Willmores</td>
<td>2056</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
<td>Policy WIT4 - Witney Sub-Area Strategy Finally, we object to MAIN104 (paragraphs 9.2.51a-9.2.51b) which appear to promote the potential merits of a new longer-term option to the west of Downs Road. The position set out in this new text has not been subject to previous consideration and, importantly, does not appear to have been subject to sustainability appraisal. It is therefore inappropriate and unjustified for the Council to introduce such support for this location in the Local Plan at this time.</td>
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</tr>
<tr>
<td>MM752</td>
<td>Bloombridge</td>
<td>Bloombridge</td>
<td>Mr</td>
<td>Cutler</td>
<td>2057</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
<td>Policy WIT4 - Witney Sub-Area Strategy Finally, we object to MAIN104 (paragraphs 9.2.51a-9.2.51b) which appear to promote the potential merits of a new longer-term option to the west of Downs Road. The position set out in this new text has not been subject to previous consideration and, importantly, does not appear to have been subject to sustainability appraisal. It is therefore inappropriate and unjustified for the Council to introduce such support for this location in the Local Plan at this time.</td>
</tr>
<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>848</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
<td>MAIN 104 Para 9.2.49-51 Alternative Locations around Witney Stagecoach recognises that there are few suitable clearly available alternative opportunities to accommodate development around Witney, without seriously conflicting with other constraints and policy objectives, including those within NPPF. Not least of these constraints is the difficulty providing real choices to travel by sustainable modes. Stagecoach agrees that any such opportunities, apart from a small amount of land north of Woodstock Road, are likely to lie in the west of the town beyond committed development at Downs Road. The difficulties integrating successive rounds of plan-led expansion at a large number of towns suggests that policy ought to consider requiring that the opportunities for longer-term development adjacent to allocated sites and larger scale “departure” permissions, should identify and secure for future access to, and integration with, long-term development opportunities, beyond the Plan period, especially West of Witney.</td>
</tr>
<tr>
<td>MM399</td>
<td>Hailey Parish Council</td>
<td>Graham Knaggs</td>
<td>Mr</td>
<td>Knaggs</td>
<td>878</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
<td>Main 104 – Alternative Options for Strategic Growth at Witney Land to the south of Witney which straddles the boundaries of Ducklington and Curbridge Parishes, whilst physically proximate to the town centre and main employment areas in the south is segregated from the town by the A40. There are concerns regarding noise, odour and landscape impact and unlike the alternative options, the scheme would not deliver any strategic highway improvements for Witney. Policy T1 – Sustainable Transport Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to</td>
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reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.

Witney’s main traffic bottleneck is at Bridge Street. With an average of 29,000 vehicles a day, it is the only vehicular crossing of the River Windrush for local journeys and through traffic from the north and east. The constraint of the river combined with the level of demand for vehicular travel results in severe congestion, delays to buses and air pollution (it is already an Air Quality Management Area). The environment deters cyclists and pedestrians from using the route.

The new A40/Down's Road junction and A40/Shores Green improvements (Main 102) will significantly reduce traffic (and air pollution) in Bridge Street whereas the North Witney proposal combined with the recent successful applications on New Yatt Road (270 and 40 houses) will substantially increase traffic (and air pollution) in Bridge Street. Replacing North Witney with South Witney would potentially release £40m of S106 funding:

- Northern Distributor Road (£10m)
- West End Link road (£23.2m)
- Foul water drainage (£3m)
- Flood alleviation (£3m)

We will also work with Oxfordshire County Council to identify funding for their long term strategy for the A40 which will involve dualling between Witney and Eynsham and a westbound bus lane.

However, the £55m funding to facilitate the above long term strategy has yet to be identified. Selection of South Witney as an alternative to North Witney could be used to facilitate Oxfordshire County Council’s transport strategy outlined above to improve the A40 between Witney and Oxford. This proposed change of strategy would benefit substantially more residents than the existing strategy.

Other advantages to replacing North Witney with South Witney are:

- Traffic from South Witney would avoid the Bridge Street bottleneck (Air quality management area) on journeys into Witney.
- A South Witney development would be able to take advantage of the existing four way A40 junction at Ductlington and the proposed four way A40 junction with Downs Road, providing direct access to the main employment areas of Oxford, Witney and Carterton.
- Conversely the development of 1,400 houses at North Witney would significantly increase traffic in Bridge Street, even with the delivery of WEL2.

Remove North Witney from the Local Plan 2031 and replace with South Witney.

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<td>MM424</td>
<td>Natural England</td>
<td>Marc Turner</td>
<td>Mr Turner</td>
<td>945</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 104</td>
<td>Land West of Downs Road</td>
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<td>It is understood that this is area is identified for potential future development post 2031; this is within the setting of the Cotswolds AONB and Landscape and Visual Impact Assessment would be required.</td>
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<tr>
<td>MM97</td>
<td></td>
<td>Mr Grumpy</td>
<td>Mr</td>
<td>Sesicall</td>
<td>251</td>
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<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>904</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1077</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
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<tr>
<td>MM459</td>
<td>Witney Chamber of Commerce</td>
<td>Witney and District Chamber of Commerce</td>
<td>Mrs</td>
<td>Guntrip</td>
<td>1133</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
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<tr>
<td>MM743</td>
<td>East Witney Land Consortium</td>
<td>c/o Carter Jonas</td>
<td>c/o Carter Jonas</td>
<td></td>
<td>1780</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
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</table>
| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs Jacobs     | Jacobs            | 2215       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 108 | Ecology and Natural Environment  
In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.  
The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being.  
Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.  
Witney – Woodford Way Car Park  
There is an opportunity to introduce new green infrastructure to benefit the surrounding area and to counterbalance local noise and air pollution impacts on residents. |
| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs Jacobs     | Jacobs            | 2245       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 108 | Omission of transport infrastructure from the policy. We suggest the following addition to ensure this policy is in line with LTP4.  
Provision of satisfactory vehicular access, provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians, and cyclists with links to key. Provision of individual Travel Plan (and associated Travel Information Packs) for the residential and employment areas. |
| MM111         | Print Design Focus       | Sue Carter       | Mrs Carter     | Carter            | 279        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 108 | I wish to express our concern as a local business and myself as a local resident to the proposed building of 50 homes on the Woodford Way Car park in Witney.  
The loss of 255 car parking spaces would be devastating for workers in Witney for which this is the only long term i.e. all day parking. It is very understandable to look to reduce the numbers of cars on the roads but with the loss of public transport and many people travelling longer distances than it is feasible to walk or cycle this would make recruitment of staff even more difficult than it is at present.  
The car park is at present always very well utilized, it’s not as if no-one is using it. |
| MM117         |                         | Rachel Smith     | -               | -                 | 290        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 108 | I am writing this email out of concern that you are planning on building 50 houses on the car park on Woodford way in Witney. I currently use this car park on a daily basis as we have huge problems parking where we live on Gloucester Place. I do shift work and quite often miss out on the spaces by my house so use the car park where I know I can leave my car for 12 hours or so and it’s not a problem. We moved to Gloucester place knowing the parking would be tight, however we knew we had the car park as a backup.  
Where will everyone park? When I finish a shift at 0200hr, there are plenty of cars using this car park, where will they all go? Where will the extra cars from the 50 houses go?  
Witney is a popular place to shop due to the free car parking. I do believe people will be put off shopping here if they are unable to find somewhere to park. With the new shops currently being built in Oxford surely they... |
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<tr>
<td>MM210</td>
<td>BRIZE NORTON PARISH COUNCIL</td>
<td>Garry Griffin</td>
<td>Mr</td>
<td>GRIFFIN 414</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 108</td>
<td>will just head there and use the park-and-ride etc. Won't they want to do that that rather than come to Witney and drive round and round without finding a carpark spot. This will have a dramatic affect on Witney and a knock on affect to the shop owners. Please think again and don't consider building on the car park. We are unable to move because of the increasing prices so we will have to stay put in Gloucester Place and it will quite frankly will be in utter nightmare if we are unable to park.</td>
</tr>
<tr>
<td>MM273</td>
<td>-</td>
<td>Mark Sansom</td>
<td>-</td>
<td>Sansom 486</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 108</td>
<td>Finally I would like to question the idea of building 50 houses in Witney on the Woodford way car park site. I am concerned that this car park seems to be much needed as it is always full and therefore I would question where the planners think these people will park. I have not seen a plan to produce extra car parking elsewhere. I also believe that this car park is often used by people who require to park for longer periods, and I question where else this facility is offered. I believe that the limited long term space available in the nearby multi story car park is also often full. Thank you for the opportunity to put these points. I would also like to thank the team within West Oxford Council for all their work to try to come up with the best possible solution, as I am very aware of how important it is to get this right.</td>
</tr>
<tr>
<td>MM9</td>
<td>Private</td>
<td>Roger Ball</td>
<td>Mr</td>
<td>Ball 58</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 108</td>
<td>I object to any development of the Woodford Way car park. This car park is essential to support the shops in Witney and also for visitors to the hospital and GP practices and students at the FE College. The multi-storey car park is often full. Since the County Council has drastically reduced bus services many more people are using cars to access Witney. It is the only long-term car park.</td>
</tr>
<tr>
<td>MM336</td>
<td>Sasha Robertshaw</td>
<td>-</td>
<td>Robertshaw</td>
<td>622</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 108</td>
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<tr>
<td>MM375</td>
<td>Charlbury Town Council</td>
<td>Charlbury Town Council Mr S R</td>
<td>Mr</td>
<td>Clarke 734</td>
<td>&gt; SECTION 9 - STRATEGY AT THE</td>
<td>Policy WIT2a – Woodford Way Car Park This long stay car park is used by people from outside Witney travelling there to work, but no mention has</td>
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<td>MM40</td>
<td></td>
<td>Richard Clarke</td>
<td>Mr Clarke</td>
<td>85</td>
<td>LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 108</td>
<td>been made of ensuring that alternative long-term provision is available in the area.</td>
</tr>
</tbody>
</table>
| MM419        | Environment Agency      | Joe Callard    | Mr Callard       | 933        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 108 | EVERYONE SHOULD BE VERY CONCERNED  
POSSIBLE CAR PARK CLOSURE-WOODFORD WAY  
-LOSS OF VITAL CARPARK FOR SHOPPERS  
-ALL DAY PARKING FOR STAFF IN BUSINESS AND HOSPITAL...WHERE DO THEY PARK??  
-HOSPITAL NEXT DOOR (carpark is now pay and display)  
CONSULTATION RUNS FROM 11TH NOV-23RD DEC 2016!  
Contact West Oxon District Council with your views.  
Register at planning.policy@westoxon.gov.uk or phone 01993 861000 ask for Planning Policy  
Your views will be passed on to the planning inspectorate. WODC will notify you about future meetings and decisions.  
Witney has the best reputation for FREE parking with great shops and is a happy friendly town.  
We could lose all of this if this is voted to proceed by WODC, who by the way have their OWN CARPARK (That's nice!!!)  
This town is working-Don't change it! Listen to the people! |
| MM456        | Sport England           | Raymond Cole   | Mr Cole          | 1121       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Witney Sub Area > MAIN 108 | The West Eynsham strategic development area contains areas of Flood Zone 2 and 3 associated with the Chil Brook.  
The allocated site at Woodford Way Car Park, Witney contains an area of Flood Zone 2 originating from the River Windrush.  
Paragraph 100 and 101 of the National Planning Policy Framework (NPPF) requires that a Strategic Sequential Test is undertaken to ensure both the strategic allocation, and the Plan are sound. The Strategic Flood Risk Assessment will provide the basis for applying the test and a sequential approach. Once the Sequential Test is undertaken the Exception Test would be required in accordance with Paragraph 102 of the NPPF.  
The text indicates that the existing playing field at Ripley Lane may be affected by this proposal. The Council should advise whether or not this will occur. The Council should also undertake a playing pitch strategy to determine what level of new provision is required to support the new housing. |
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<tr>
<td>MM765</td>
<td></td>
<td>Mr and Mrs Martin Kinch</td>
<td>Mr</td>
<td>Kinch</td>
<td>1997</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 109</td>
<td>Strutt &amp; Parker act on behalf of Mr and Mrs Martin Kinch, owners of the land west of Minster Lovell, which the West Oxfordshire Local Plan 2031 allocates for around 85 homes. My clients welcome the identification of this land as a non-strategic housing allocation which now benefits from a resolution to grant planning permission following the November 2016 meeting of the Council’s Lowlands Area Planning Sub-Committee.</td>
</tr>
<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>905</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 109</td>
<td>Stagecoach notes that this proposed allocation is subject to a Resolution to Grant planning permission. The site is and is likely to remain close to a regular commercial bus service in some form, and developer funding to help secure or improve this service on a &quot;pump-priming&quot; basis is likely to be sought from Oxfordshire County Council. The extra demand arising from this site will have a small but material impact on maintaining and increasing patronage on service 233.</td>
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<tr>
<td>MM765</td>
<td></td>
<td>Mr and Mrs Martin Kinch</td>
<td>Mr</td>
<td>Kinch</td>
<td>1998</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 110</td>
<td>Strutt &amp; Parker act on behalf of Mr and Mrs Martin Kinch, owners of the land west of Minster Lovell, which the West Oxfordshire Local Plan 2031 allocates for around 85 homes. My clients support the identification of the land as shown in Figure 9.4b as an allocation for residential development.</td>
</tr>
<tr>
<td>MM403</td>
<td>Minster Lovell Parish Council</td>
<td>Minster Lovell Parish Council</td>
<td>Mrs</td>
<td>Doughty</td>
<td>889</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 110</td>
<td>The site plan for the allocation of 85 homes approved under planning application 16/02588/OUT is substantially different to the site plan in policy WIT2b (Appendix A refers). Minster Lovell Parish Council strongly objects to the additional area shown with a green outline. The site should be constrained to the approved area shown with a blue outline in order to prevent unwanted and unsustainable development that will detrimentally impact on the setting of listed Chartist properties of the Brixe Norton Road.</td>
</tr>
<tr>
<td>MM765</td>
<td></td>
<td>Mr and Mrs Martin Kinch</td>
<td>Mr</td>
<td>Kinch</td>
<td>2000</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN111</td>
<td>Strutt &amp; Parker act on behalf of Mr and Mrs Martin Kinch, owners of the land west of Minster Lovell, which the West Oxfordshire Local Plan 2031 allocates for around 85 homes. My clients welcome the identification of this land as a non-strategic housing allocation and wish to reiterate to the Council that, in line with the advice included within the National Planning Policy Framework relating to the deliverability of sites allocated for residential development, the site is ‘available’ now for residential development, offers a ‘suitable’ location for new housing and is ‘achievable’ with a realistic prospect that housing can be delivered within five years. This is supported by the submission of an outline planning application for 85 homes on the site which received a resolution to grant planning permission at the November 2016 meeting of the Council’s Lowlands Area Planning Sub-Committee. Key elements of the scheme reflect the provisions of draft Policy WIT2b: § The provision of around 85 new market and affordable homes in close proximity to local services and amenities. The illustrative Masterplan submitted featured an attractive and high quality development of 8x1 bedroom, 31x2 bedroom, 33x3 bedroom, 9x4 bedroom and 4x5 bedroom homes with the larger units principally located in the southern areas of the Site. The mix will allow for a choice of housing tenures and...</td>
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sizes. Affordable housing will be provided in accordance with the requirements of draft Policy H3 (40% affordable tenure, delivered on site) and will comprise a mix of rented and shared ownership;

§ Provision of new on and off-site community facilities and services, including public open space to south of site which will provide a transition from the proposed development to the adjacent agricultural fields. This well-defined and overlooked space provides a large area of semi-natural open space and creates an attractive recreational amenity which complements the existing public open space at the adjacent Ripley Avenue Amenity Area;

§ The scheme uses design cues taken from the original layout of the Chartist settlement to create a development that is sensitive to the historic development pattern present in Minster Lovell whilst ensuring neighbouring properties are respected. The long rear gardens positioned along eastern boundary help to establish a buffer to adjacent existing properties.

§ Provision of one vehicular and two pedestrian links onto Burford Road along with a new pedestrian crossing;

§ A reduction in the speed limit is proposed along the site frontage with the Burford Road with associated infrastructure including Vehicle Activated Signs (VAS) to deter speeding;

§ Retention, management and enhancement of existing hedgerows and trees to promote biodiversity, integrate the development with the existing landscape character and minimise its visual impact;

§ New boundary planting around the south west corner reducing longer views;

§ Enhanced planting along existing hedgerow boundary on the western edge;

§ Provision of additional planting to mitigate any visual impact from surrounding areas and the Cotswold AONB;

§ Retention of existing trees along Burford Rd and addition of dry stone wall entrances – screening the development while retaining landscape features, enhancements to the ecology and creation of rural residential character, therefore reducing traffic speeds; and

§ Integration of Sustainable Urban Drainage Systems (SUDS) including an attenuation basin.

The Illustrative Masterplan submitted as part of the application features a scheme with a net density of 19 dwellings per hectare. This is a particularly low density and given land is a finite resource and the encouragement within the Framework to make the most efficient use of land, it is submitted that the site is capable of accommodating more than 85 dwellings whilst still complying with the provisions of draft Policy WIT2b. Based on the size and location of the site and the density of neighbouring development, this proposed allocation could accommodate a further 40-50 dwellings. Therefore in line with the Government’s requirement in paragraph 47 of the Framework to “boost significantly the supply of housing” and to optimise the potential of the site, it is proposed that this allocation is increased to ‘around 125 new homes’.

I would wish to participate at the oral examination in support of the allocation.
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2244</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN111</td>
<td>The site is also listed in modifications MAIN 90 (Paragraphs 9.2.27 – 9.2.28 and Table 9.1), MAIN 115 (Policy WIT4 - Witney Sub-Area Strategy) and MAIN219 (Appendix 3 - Local Plan Delivery and Monitoring Framework) however as these merely comprise lists of the modified plan’s additional site allocations, my clients do not have any further comments on these modifications.</td>
<td></td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2246</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>Ecology and Natural Environment In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species. The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.</td>
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<td>MM457</td>
<td>North Witney Action Group NWAG</td>
<td>North Witney Action Group (NWAG)</td>
<td>Mr Neyroud</td>
<td>1328</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN113</td>
<td>WODC continues to position WEL as the second river crossing for Witney, when OCC’s LTP4 determines that the Shores Green junction upgrade becomes the second river crossing (OCC LTP4 WIT1), with WEL not even specified in LTP4 WIT1. Furthermore, Shores Green upgrade is not currently fully funded (9.2.34a), and OCC would look to WODC to assist in providing funding. Additionally, the Inspector (Frances Mahoney) at the Gladman/Burford Rd planning appeal (14/1215/P/OP) in her final report, para 318 wrote, “The Council is clearly committed to the SGSR scheme and sees it as a primary solution to the problem of air quality and highways congestion within Witney.” The Secretary of State granted planning permission and agreed a £1.16m contribution towards the SGSR scheme. (Para 16) Alarmingly, Main 113, 9.2.58 removes the onus from the developers of North Witney SDA from their responsibility of delivering WEL to a mere facilitation role. In doing so WODC has left itself vulnerable to the full funding of the (currently) £23.2m West End Link Road which is “needed to enable the proposed development of land to the north of Witney” (Local Plan CD1. 7.36)</td>
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<tr>
<td>MM743</td>
<td>East Witney Land Consortium</td>
<td>c/o Carter Jonas</td>
<td>c/o Carter Jonas</td>
<td>1776</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 113</td>
<td>The second bullet point of paragraph 7.32 addresses the Shores Green Slip Roads, and states that: ‘Delivery will be facilitated by the proposed East Witney Strategic Development Area.’ Similarly, the second bullet point of paragraph 9.2.58 states that the Shores Green Slip Roads will be “…facilitated by new development including primarily the proposed East Witney Strategic Development Area.’ We would suggest that the wording in paragraph 9.2.58 is more appropriate, as it recognises that other developments will contribute towards the delivery of this new infrastructure. A significant financial contribution (in excess of £1m) has already been secured towards this new transport infrastructure from a scheme off the Burford Road, Witney. Indeed, we would suggest that the Local Plan should commit to seeking further financial contributions towards the Shores Green Slips Roads from any proposed allocations or future windfall sites that would impact on traffic movements in the vicinity, including on Bridge Street.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2247</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 113</td>
<td>It is proposed that a strategic transport strategy and fund will be created for Witney in conjunction with the County Council as highway authority.</td>
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td>906</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 113</td>
<td>MAIN 113 Paras 9.2.58-9.2.59 Strategic Highways Schemes and funding for Witney It is clear that the main highways schemes necessary to create the capacity to satisfactorily accommodate traffic arising from the development strategy in Witney, suffer from both their costs, and the need for land outside the control either of promoters of draft allocations, or the Highways Authority. Stagecoach welcomes the recognition in the proposed modifications that development North of Witney will “contribute to” the delivery of the West End Link Road (WELR), and that it is now accepted that even the enlarged proposed allocation cannot credibly be expected to deliver the scheme. However WELR is clearly required if existing conditions at Bridge Street, through which all the main bus services serving the town must pass, are not to become significantly worse as a direct result of the traffic arising from North of Witney SDA. The question is therefore begged, that the proposed allocation of the North of Witney SDA cannot be sound, unless some mechanism is found in the Plan to demonstrate that the WELR is in fact credibly deliverable over the Plan period, in which case, it would be possible to consent the scheme as a whole subject to the discharge of a “Grampian Condition”, which would not permit the occupation of more than an agreed number of dwellings before WELR is completed and open to traffic. Stagecoach therefore proposes that to make the Plan sound, permission for the North of Witney SDA will be conditional on the identification of a threshold beyond which traffic generation would exceed the ability of other mitigations to achieve “nil detriment” to the Bridge Street junctions, and that no dwellings will be occupied until the West End Link Road is completed and opened to traffic.</td>
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<td>MM451</td>
<td>English Heritage Historic England</td>
<td>Mr Small</td>
<td>1078</td>
<td>&gt; SECTION 9 - STRATEGY AT THE</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN114 for the addition of a commitment to conserving and enhancing the special interest of the Witney Conservation Area and the significance of the other heritage assets in the town, as part of the positive strategy for conserving and</td>
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<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1079</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN115 for the addition of a requirement for the conservation and enhancing of the historic environment as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework.</td>
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<td>MM490</td>
<td>M/S Strainge</td>
<td>Mr</td>
<td>Stranje</td>
<td></td>
<td>1226</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
<td>West Witney - ‘Area of long term future development potential’ Further to the above, whilst we encourage the increase in overall numbers, we would suggest that they are treated as a whole OANfigure of 15,950, as opposed to the splitting of the Oxford City numbers out of the total OANfor WODC. With this aside, and with reference to MOD 24 Policy HI, it is encouraging that the distribution of housing numbers has increased the distribution to the Witney sub-area from 3,700 - 4,400. Whilst the Witney sub-area is the smallest by area, it is the most densely populated, with 33,000 people, circa 28,000 of which live in Witney, the District’s largest town. Witney is the main service centre for West Oxford, and with almost a third of the employment opportunities being located in the sub-area, it is the most logical and sustainable location to site the highest proportion of the District’s future housing and employment growth. There are currently three Strategic Development Areas (SDAs) identified within Witney: East Witney SDA - 450 homes North Witney SDA - 1,400 homes West Witney SDA - 1,000 homes Each of these are targeted to deliver within the Plan Period, however looking forward, there is then limited scope for future growth. We note that a number of options have been considered, and that the land to the west of the West Witney SDA (West of Downs Road) is now considered to have ‘future development potential.’ We echo paragraphs 9.2.51 a / b of MAIN 104 and agree that once the West Winey SDA is built out, the area to the west of the town becomes more urbanised and the context of the land will change, and thus forming a logical extension to the town. The site is well placed to provide additional employment and dwellings to form a logical residually led, mixed use, urban extension to Witney. Additional employment would complement the existing provision off Downs Road, and with the provision of improved access onto the A40, via a new junction, would be a sustainable location to site future growth. As indicated in MAIN 104, in order to achieve the optimum benefit, and plan for the full capacity of the area, the relocation of the Witney Golf Club will need to be considered in detail. Given the proximity of Minster Lovell, and the relatively low landscape significance of the area, the</td>
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<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
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<td>Crest Strategic Projects</td>
<td>1467</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
<td>relocation of the course to run adjacent to the eastern edge of Minster Lovell, between the existing built form and the potential next stage SDA for Witney would prevent coalescence and provide a sensitive yet community and employment enhancing boundary feature. In summary we and our clients are fully supportive of the Council’s modifications to include the land to the west of the West Witney SDA (West of Downs Road) as a future growth area. The site presents the most logical, relatively unconstrained, sustainable direction to locate the future housing and employment within the District’s main service centre.</td>
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<tr>
<td>MM743</td>
<td>East Witney Land Consortium</td>
<td>c/o Carter Jonas</td>
<td>c/o Carter Jonas</td>
<td>1784</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
<td>Main Modification 115 identifies further employment land in Witney, in addition to the land already allocated, but this land is also to the west of the town. Land to the west of Downs Road is identified in Policy WIT 4 as an ‘area of future, long term development potential’. The Plan makes no provision for strategic employment to the east of the town, although the two Strategic Development Areas, which together will provide approximately 1,850 new homes, are located to the East and the North of the town. The current spatial strategy for employment provision in Witney, proposed in the Main Modifications to the Submission Plan, will lead to an increased number of journeys across the town between significant residential development in the east, and employment opportunities in the west, potentially increasing car use and exacerbating congestion around the Bridge Street junction in the centre of town. Allocation of the Land off Jubilee Way for a mixed use, residential and employment development would help address the current imbalance between employment and residential uses in the town, which is being exacerbated by the Proposed Modifications. This proposal would also assist in bolstering the Council’s housing land supply position, with an additional development outlet that could contribute to the Council’s overall housing target.</td>
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<td>MM754</td>
<td>Persimmon Homes Wessex</td>
<td>Claire Hambleton</td>
<td>Ms</td>
<td>Hambleton</td>
<td>1894</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
<td>The Consortium supports Main 115 which states: “Land to the west of Down’s Road identified as an ‘area of future long-term development potential’ to include consideration of opportunities for new housing and employment to meet identified development needs beyond 2031.” However, the reference to ‘long-term development potential beyond 2031 is not supported. This site is available and deliverable and able to come forward within the next five years to meet West Oxfordshire’s under-supply between 2011 and 2016. Any backlog should be dealt via the Sedgefield approach and therefore should not be met residually over the rest of the plan period. Furthermore it is noted that Oxford City’s unmet housing need (2,750 homes) will only form part of any five year supply calculation that includes housing delivery assumptions from 2021 onwards. The majority of the unmet need is to be delivered</td>
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<td>MM755</td>
<td>Bushey Ground Consortium</td>
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<td>-</td>
<td>1897</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
<td>by the Eynsham Garden Village for 2,200 dwellings. It is unlikely that this site will come forward within the timescales proposed due to the complexity of the site in terms of land assembly and associated infrastructure requirements. Land to the west of Down's Road, Witney provides a logical urban extension to Witney and should be identified as an allocation within the Local Plan. As stated above the Council intends to deal with the backlog of 1,836 homes through the Liverpool approach which is unsound. The approach to calculating five year housing land supply should follow Government policy and therefore the Sedgefield approach should be used and the shortfall should be addressed as quickly as possible, i.e. within the next five years. We are concerned that 5 years has already elapsed and the Council only has 15 years left to deliver the overall requirement. We consider that delivery could be greatly assisted by confirming the allocation at Land to the West of Down’s Road, Witney for residential development. Land at Down’s Road, Witney is available and deliverable now and can assist in the short term to provide certainty on delivering Oxford City’s unmet need. As mentioned above, we have concerns over the supply of housing at West Oxfordshire Garden Village and the way in which it is intended to be ring fenced and excluded from the overall land supply calculation of the District. We consider this approach to be unsound and inconsistent with national policy. In our opinion it is unlikely that the Garden City proposal for 2,750 new homes will come forward within the timescales proposed due to the complexity of the site in terms of land assembly and associated infrastructure requirements. It is also recognised that an Area Action Plan is to be drawn up for the site which will undoubtedly be time consuming. Land to the West of Down’s Road is controlled by three developers, achieving three outlets to assist with build-out rates to deliver the backlog of housing and to maintain a five year housing land supply.</td>
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<td>We have made presentations to you on behalf of our clients, the Dowley, Conlon, Brooks, Williams and Huntly families over a number of years during the ongoing review of the Local Plan, seeking to have their land at Brize Norton Road/Bushey Ground, Minster Lovell allocated for housing, including your most recent SHLAA call for sites consultation in February this year and put forward their land as being available and suitable for such a use. Previous ref 262. We note that in the latest version of the Draft Plan a site for 85 dwellings has been proposed on a back land site adjoining the north west edge of the village and that following a planning application this site has been granted consent in the last month. We believe the Council may find the need to allocate more dwellings in sustainable settlements like Minster Lovell and our clients site is both suitable and available. There is an existing access via Bushey Ground which already serves a number of existing dwellings and businesses. We realise this site is not large enough to be seen as a strategic one, but given the draft plan modifications have now included/identified a number of non-strategic sites ranging from 25 to 300 dwellings, we believe this site should have been included as well – so Modification Main 26 (para5.30b) should be amended to include this site and likewise Main 90 Witney sub Area table 1 and again Main 115. We anticipate the Council may find there will prove to be a need to provide more deliverable sites like this because the larger sites are either not deliverable quickly or worse not at all within the Plan period. In Main 104 paras 9.2,51 a,b and c - our clients support the principle of extending development westwards from Downs Road and linking Downs Road to B4047. There is a four way link interchange proposed to the A40 at Downs road and possibly another may be provided at the B4477 at Minster Lovell. Please take this letter as a repeat of our earlier representations – our client’s land is still available for housing and possibly some element of employment and hope that you will now reconsider it for inclusion in your new plan.</td>
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Please take this letter as a repeat of our earlier representations – our client’s land is still available for housing and possibly some element of employment and hope that you will now reconsider it for inclusion in your new plan. |
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<td>MM784</td>
<td>North Witney Land Consortium</td>
<td>North Witney Land Consortium</td>
<td>-</td>
<td>2173</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115 For the reasons discussed above, we support the proposed main modifications to Policy WIT4 (Witney Sub-Area Strategy) insofar as they are relevant to North Witney, which reflect inter alia the increased housing requirement for the Witney sub-area and the increased quantum of development at the North Witney SDA.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2218</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115 Appendix 2 – Education Comments West Oxfordshire Garden Village Strategic Development Area - 2,200 homes - and West Eynsham Strategic Development Area - 1,000 homes Policy EW1a includes the provision of up to two primary schools on site (2FE including nursery) on 2.22ha sites and Policy EW1b includes the provision of a new primary school on-site (1.5FE including nursery) on a 2.22ha site. This is appropriate at this stage, but the exact distribution of primary school provision will need to be reviewed in the light of actual delivery timelines. 2200 homes would be broadly in line with 3 forms of entry, and 1000 homes would be broadly in line with 1.5 forms of entry. It may be that a 2 form entry primary school in West Eynsham – to also meet the need of other, smaller sites in the village - and a three form entry primary school on the Garden Village site is a more efficient model. One of these development sites would also need to provide land for the provision of additional secondary education capacity, as the current secondary school, Bartholomew School, does not have sufficient site area to expand in line with this level of growth. This is noted in the IDP but not in the Local Plan. An appropriate solution would be the provision of a second site for Bartholomew School, rather than creating another secondary school, which would struggle to be a financially viable size. However, this would need to be the subject of further work, and would require approval from the Regional Schools Commissioner.</td>
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<td>MM110</td>
<td>Lagan Homes</td>
<td>Lagan Homes</td>
<td>-</td>
<td>278</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115 INTRODUCTION AND SUMMARY i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Lagan Homes who have land under their control off School Hill, Minster Lovell. The land extends to 2.5ha and is identified on the plan attached as Appendix 1 to these representations. ii. Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM4115) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy. iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure...</td>
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sufficient housing land supply.

iv. Land at School Lane is under the control of Lagan Homes, is available now and capable of delivering around 25 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing between 2016-2021 and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. Lagan Homes object to Table 4.1 and the reference to Minster Lovell 'south of the Burford Road' (MM14). There is no reason why Land at School Lane and north of the Burford Road is in anyway less sustainable in locational terms than other land on the edge of the village.

vi. The following representations provide further information on the Land at School Lane and should be read in conjunction with Edgars Limited's representations regarding housing supply which are not repeated in detail in these representations.

1.0 LAND AT SCHOOL LANE, MINSTER LOVELL

1.1 Lagan Homes object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30) and WIT4 (MM115) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that Land at School Lane should be allocated for around 25 homes to help address this deficiency.

Site and Surrounding Area

1.2 The site lies adjacent to the village of Minster Lovell and the B4047 Burford Road some 3 miles (5km) west of Witney and 4 miles (6km) north of Carterton. There is an off-road cycle path to Witney (within reasonable cycling distance) and an hourly bus service to Witney. The village also has a number of amenities including a small shopping parade, Post Office, Primary School, Public House and Butcher. There are also several businesses along the Brize Norton Road.

1.3 The site is a single 2.5ha open grassland field immediately north of the Burford Road and west of School Lane. It is part of the north facing slope of the Windrush Valley. A site plan is attached at Appendix 1.

1.4 The site lies some 1m below the Burford Road and is screened by a strong hedgerow along the road frontage such that the open nature of the site is not readily perceptible from this frontage.

1.5 On the southern side of Burford Road is some modern development which is also mostly set back from the road frontage. The White Hart Public House (Listed Grade II) along with the War Memorial and Methodist Church frame the Brize Norton Road junction opposite the site.

1.6 There is a farm access in the south western corner and a strong hedgerow bounds to the west along with a Thames Water pumping station.

1.7 School lane bounds to the east. The lane lies some 1.5m below the site and views are filtered through by boundary vegetation.

1.8 School Lane leads to Little Minster. College Farm within Little Minster lies at the southern end of the site and there is a scattering of modern and historic buildings along School Land and School Hill.
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<td>1.9 School Lane and College Farm fall within a Conservation Area. A Conservation Area Appraisal has been prepared by the Council. The site is not identified in the appraisal as where there is a notable sensitive view into or out of the Conservation Area. Buildings adjacent the site are identified as Locally Listed including College Farm and the Old School.</td>
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<td>1.10 The site forms part of the northern slopes of the Windrush Valley and falls within the Cotswold AONB. The West Oxfordshire Landscape Assessment (WOLA) identifies the site as part of the Upper Windrush Character Area and part of Semi-Enclosed Valley Side Farmland which is noted to be sensitive to views within an across the valley but where there may be limited opportunities to accommodate small scale development within a strong landscape structure. The settlement pattern identifies scattered villages along the valley with Charteville (New Minster) a notable exception being sited on higher land.</td>
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<td>1.11 The site is well screened from the Burford Road, but there are some more immediate views through boundary hedgerows from School Lane. The site is appreciable but not prominent in middle distance views back from the opposite side of the valley just south of Asthall Leigh. From here existing dwellings at Little Minster and north of the Burford Road are well screened by existing trees.</td>
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<td>1.12 There is no planning history of direct relevance to the site. The site lies within Flood Zone 1 Low Risk.</td>
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<td>1.13 Access is available to School Lane and to the Burford Road. Further technical work is underway to establish the most appropriate access point.</td>
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<td>1.14 Lagan Homes have only recently acquired an interest in the site and as such the site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELAA).</td>
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<td>Key Planning Site Considerations</td>
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<td>1.15 Lagan Homes are in the process of undertaking technical and development design work to inform a planning application and this is likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as of particular relevance to the potential allocation of the site.</td>
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<td>The principle of housing development in Minster Lovell, north of the Burford Road</td>
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<td>1.16 Minster Lovell is identified as a village in the Local Plan 2031. Draft WOLP Policy H2 permits new housing adjacent to villages to meet housing needs. As such housing development on the site would be acceptable in principle.</td>
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<td>1.17 Draft Policies H2 and WIT4 seek delivery of 4,400 homes in the Witney Sub Area including Minster Lovell. Delivery is proposed through three Strategic Development Areas (SDAs - West, East and North Witney) each with strategic highway improvements. Land West of Minster Lovell is proposed for allocation confirming the suitability of the settlement for additional housing development.</td>
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<td>1.18 There is residual windfall requirement of 304 homes within the Witney Sub-Area.</td>
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</table>
1.19 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which will likely result in continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead in times of SDAs, addressing the current supply deficiencies is best achieved through allocating additional non-strategic developments such as Land at School Lane, Minster Lovell.

1.20 Land at School Lane lies adjacent to Minster Lovell, close to amenities and public transport links. The village bus stops, public house and shops are located on the opposite site of the Burford Road to the site in very close proximity. The village school lies within 500m to the south. The site is also within cycling distance of the West Witney employment areas (2km) and Witney Town Centre (5km). In locational terms, it is sustainable. Indeed, the site lies closer to village amenities than the proposed allocation west of the village.

1.21 It is noted that Table 4.1 of the plan includes Minster Lovell as a village within the settlement hierarchy but this has been modified to (MM 14) to include reference to Minster Lovell ‘south of the Burford Road’. Lagan Homes object to this modification.

1.22 In Edgars opinion, the development of Land at School Lane and north of the Burford Road can comply with Policy H2 in being adjacent to a village in the settlement hierarchy.

1.23 There is no reason why land at School Lane, north of the Burford Road, is in any way less sustainable in locational terms than other land adjoining the village. Indeed, land at School Lane is in closer proximity to many of the villages amenities, including the school, shops and public house than other land on the edge of the village.

1.24 Draft Policy OS2 Locating development in the right places states that villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. Development should form a logical complement to the settlement pattern, protect landscape character and settlement identity.

1.25 The site does not appear to have been part of the historic Chartist settlement for which Minster Lovell is known. The site does lie within the Cotswolds AONB and adjacent to a Conservation Area.

1.26 The site is not identified in the Council’s Conservation Area appraisal as where there is a notable sensitive view into or out of the Conservation Area.

1.27 Views of the site are already filtered by vegetation and topography. The WOLA identifies that this area of the Windrush Valley can accommodate development within a strong landscape structure. Indeed, in views from across the valley, existing landscape features act as a screen to existing dwellings on the Burford Road.

1.28 The setting of the Conservation Area and AONB can be preserved and enhanced through a low density but high quality development within a strong and extensive landscape structure. Although the extent of the land is 2.5ha, only around 25 dwellings are proposed leaving significant scope for open space and landscaping.

1.29 In Edgars opinion, a development of this scale does not comprise ‘major’ development for the purposes
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<tr>
<td>MM269</td>
<td>MT 19 Viner</td>
<td>Mrs Thompson</td>
<td></td>
<td></td>
<td>482</td>
<td>&gt; SECTION 9</td>
<td>My major areas for comment are</td>
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<td>- STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
<td>INFRASTRUCTURE this is at present in adequate for the proposals and needs to be in place before the development</td>
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<td>ESPECIALLY BRIDGE STREET IN WITNEY, we need this to be sorted URGENTLY</td>
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<td>FLOODING the proposed development for north/east Witney will if not very carefully managed cause major distress</td>
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<td>To the people living at the west end of Hailey Road which is totally unfair for these people they have had enough</td>
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<td>Stress to deal with recently and if the plan adds to this then WODC must take responsibility for this and not Destroy any lives/properties.</td>
</tr>
<tr>
<td>MM380</td>
<td>Berks, Bucks and Oxon Wildlife Trust</td>
<td>Mrs Breith</td>
<td></td>
<td>Breith</td>
<td>788</td>
<td>&gt; SECTION 9</td>
<td>Sub-Area-Strategy wording</td>
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<td>- STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
<td>We found that that proposed sub-area policies (eg policies WIT4 or EW2) give insufficient weight to the protection and enhancement of the natural environment and the importance of Green Infrastructure and Masterplanning.</td>
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<td>We propose that additional bullet points are added to the policies, eg:</td>
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<td>Proposals for development in the sub-area should be consistent with the strategy which includes:</td>
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<td>- maximising opportunities for enhancements within the Conservation Target Areas (CTAs)</td>
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<td>- masterplanning of strategic development sites that takes adequate account of open space and green infrastructure networks and needs, and maximises opportunities to create and strengthen green infrastructure in accordance with the Council’s Green Infrastructure Plan (to be prepared)</td>
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<tr>
<td>MM380</td>
<td>Berks, Bucks and Oxon Wildlife Trust</td>
<td>Bbowt - Haidrun Breith</td>
<td>Mrs</td>
<td>Breith</td>
<td>790</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
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<td>Witney</td>
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<td>An additional 4,400 homes are proposed to the West, North and East of Witney. We welcome that no housing is proposed south of the A40 or in immediate proximity to any designated nature sites.</td>
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<td>However, this quantum of development is expected to cause increased recreational pressure in the surrounding countryside and we are concerned about the impact this might have on nearby sites of conservation interest such as the LWS/ Ancient Woodland Cogges Wood east of Witney and the Upper Windrush Valley.</td>
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<td>We consider it important that development provides sufficient attractive open space for people to use and which is good for wildlife. We believe that the proposed expansion of Witney should be subject to an overall masterplan and accompanied by a green infrastructure strategy that considers Witney's open space and green infrastructure needs in their entirety. This way a comprehensive network of green links and open spaces could be created rather than each development delivering open space and green infrastructure in isolation with lesser effect.</td>
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<td>Development is proposed near the Upper Windrush Conservation Target Areas (CTA) and as such we would expect development near the CTA to contribute to the aims and objectives of the CTA.</td>
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<tr>
<td>MM403</td>
<td>Minster Lovell Parish Council</td>
<td>Minster Lovell Parish Council</td>
<td>Mrs</td>
<td>Doughty</td>
<td>890</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 115</td>
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<td>Minster Lovell Parish Council strongly objects to agricultural land between Minster Lovell and Downs Road being identified as an area of future long term development potential. Inclusion of this element of the policy will completely erode the margin between Minster Lovell and Witney. Bushey Ground (Minster Lovell) would link with future developments and the village will become a suburb of Witney. This part of the policy should be removed.</td>
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<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs Peach</td>
<td></td>
<td>716</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Witney Sub Area &gt; MAIN 116</td>
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<td>Unsound as incorrect population recorded</td>
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**SECTION 9 – CARTERTON SUB-AREA**

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<td>MM473</td>
<td>Stop Carterton West</td>
<td>Mr Munro</td>
<td>1175</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 117</td>
<td>We welcome the proposition that the identification of good development opportunities within Carterton should be prioritised, and agree that redevelopment of MOD housing is important to the successful progress of Carterton as a thriving town.</td>
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<tr>
<td>MM505</td>
<td>Verena Hunt</td>
<td>Miss Hunt</td>
<td>1248</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 117</td>
<td>I support these amendments. Local residents have long argued for the redevelopment of the vast areas of low density MOD housing at Carterton. This would help to support the vitality and viability of the Town Centre. It would also help to regenerate the town and to improve the area visually.</td>
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1483</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 117</td>
<td>CPRE feels that the focus in Carterton should be to strengthen the core of the town. Therefore, CPRE is supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across the 2 sites. Therefore, CPRE supports clauses 9.3.5-9.3.6, 9.3.36 &amp; 9.3.50. However, the REEMA areas cover 146 acres in total. The last information from the MOD indicated that 742 SFA homes are needed, which at the usual JSP density of 12 per acre, will require 62 acres, leaving 84 acres spare. North and Central areas cover approximately 70 acres (22 at REEMA North and 48 at REEMA Central), so the allocation of 300 houses in addition to the existing 200 is modest, even accounting for some retail or leisure land. CPRE also feels that there is likely to be potential in other REEMA areas in the town and it now appears that past claims of increasing housing need generated by RAF Brize Norton were unfounded. The existing houses are at an approximate density of 6 homes per acre, as they are not well-planned. Therefore, no further expansion of the town should occur until these sites achieve their potential and any future development in Carterton should be focused at REEMA. It is clearly preferable to development on open countryside and CPRE agrees with WODC that it will improve the style and image of the town. It is development that would lead to clear betterment and would be likely to be well supported in the community. In line with the need, mostly apartments and small homes should be built, with a few larger gateway properties for kerb appeal. Some housing for the elderly would be beneficial. That means that the density could be relatively high, in line with most town centre developments. It would not be unreasonable to expect a density of 20-30 per acre or 50-75 per ha to be achieved in line with other mixed developments in the area, giving a total potential of at least 1,680 homes in REEMA North and Central areas alone, based on 50 units per ha.</td>
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<tr>
<td>MM792</td>
<td>Alvescot Parish Council</td>
<td>Mrs Hoad</td>
<td>2323</td>
<td>&gt; SECTION 9 - STRATEGY AT THE</td>
<td>Main 117: paragraph 9.3.5 The Parish Council agrees that re-development of MOD housing is important to the successful progress of</td>
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<tr>
<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs Peach</td>
<td>700</td>
<td>LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 117</td>
<td>9.3.4</td>
<td>Unsound as incorrect volume of housing at Shilton Park</td>
<td></td>
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1501</td>
<td>SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 71</td>
<td>CPRE feels that the focus in Carterton should be to strengthen the core of the town. Therefore, CPRE is supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across the 2 sites. Therefore, CPRE supports clauses 9.3.5-9.3.6, 9.3.36 &amp; 9.3.50.</td>
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<td>However, the REEMA areas cover 146 acres in total. The last information from the MOD indicated that 742 SFA homes are needed, which at the usual JSP density of 12 per acre, will require 62 acres, leaving 84 acres spare. North and Central areas cover approximately 70 acres (22 at REEMA North and 48 at REEMA Central), so the allocation of 300 houses in addition to the existing 200 is modest, even accounting for some retail or leisure land. CPRE also feels that there is likely to be potential in other REEMA areas in the town and it now appears that past claims of increasing housing need generated by RAF Brize Norton were unfounded. The existing houses are at an approximate density of 6 homes per acre, as they are not well-planned. Therefore, no further expansion of the town should occur until these sites achieve their potential and any future development in Carterton should be focused at REEMA. It is clearly preferable to development on open countryside and CPRE agrees with WODC that it will improve the style and image of the town. It is development that would lead to clear betterment and would be likely to be well supported in the community. In line with the need, mostly apartments and small homes should be built, with a few larger gateway properties for kerb appeal. Some housing for the elderly would be beneficial. That means that the density could be relatively high, in line with most town centre developments. It would not be unreasonable to expect a density of 20-30 per acre or 50-75 per ha to be achieved in line with other mixed developments in the area, giving a total potential of at least 1,680 homes in REEMA North and Central areas alone, based on 50 units per ha. In fact, Carterton has the least infrastructure and facilities of the three main towns and lags behind in terms of employment opportunities, as noted in the Draft Local Plan clauses 2.26, 9.3.10, 9.3.39 &amp; 9.3.42. There is a pre-existing imbalance between numbers of jobs and homes/ workers, meaning that out-commuting is high. It's the furthest from Oxford and has no A road access. There is mention in 9.3.15 and 9.3.67 of upgrading the B4477 in Brize Norton to an A road at a cost of £3.9M, but clauses 7.48 &amp; policy T2 are vague about funding. It appears that there is no firm commitment or allocated funding. It is not clear that the MOD would in fact provide an A road or appropriate funding.</td>
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</table>
either where the £7.2M for westbound slips onto the A40 will come from at Minster Lovell.

Carterton should not therefore be seen as the obvious place to put any houses that other areas do not want, as has been suggested by some.

If a significant number of houses were moved from Witney to Carterton, Carterton would encounter significantly more growth per capita than Witney. Carterton could not sustain such growth without further major incursion into open countryside in neighbouring parishes (over and above that already caused by Shilton Park, Carterton North and Carterton East in Brize Norton and Shilton Parishes), which CPRE considers unacceptable.

CPRE feels that the focus in Carterton should be to strengthen the core of the town.

Therefore, CPRE is supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across the 2 sites. Therefore, CPRE supports clauses 9.3.5-9.3.6, 9.3.36 & 9.3.50.

However, the REEMA areas cover 146 acres in total. The last information from the MOD indicated that 742 SFA homes are needed, which at the usual JSP density of 12 per acre, will require 62 acres, leaving 84 acres spare. North and Central areas cover approximately 70 acres (22 at REEMA North and 48 at REEMA Central), so the allocation of 300 houses in addition to the existing 200 is modest, even accounting for some retail or leisure land. CPRE also feels that there is likely to be potential in other REEMA areas in the town and it now appears that past claims of increasing housing need generated by RAF Brize Norton were unfounded. The existing houses are at an approximate density of 6 homes per acre, as they are not well-planned.

Therefore, no further expansion of the town should occur until these sites achieve their potential and any future development in Carterton should be focused at REEMA. It is clearly preferable to development on open countryside and CPRE agrees with WODC that it will improve the style and image of the town. It is development that would lead to clear betterment and would be likely to be well supported in the community. In line with the need, mostly apartments and small homes should be built, with a few larger gateway properties for kerb appeal. Some housing for the elderly would be beneficial. That means that the density could be relatively high, in line with most town centre developments. It would not be unreasonable to expect a density of 20-30 per acre or 50-75 per ha to be achieved in line with other mixed developments in the area, giving a total potential of at least 1,680 homes in REEMA North and Central areas alone, based on 50 units per ha.

In fact, Carterton has the least infrastructure and facilities of the three main towns and lags behind in terms of employment opportunities, as noted in the Draft Local Plan clauses 2.26, 9.3.10, 9.3.39 & 9.3.42. There is a pre-existing imbalance between numbers of jobs and homes/ workers, meaning that out-commuting is high. It’s the furthest from Oxford and has no A road access. There is mention in 9.3.15 and 9.3.67 of upgrading the B4477 in Brize Norton to an A road at a cost of £3.9M, but clauses 7.48 & policy T2 are vague about funding. It appears that there is no firm commitment or allocated funding. It is not clear either where the £7.2M for westbound slips onto the A40 will come from at Minster Lovell. Carterton should not therefore be seen as the obvious place to put any houses that other areas do not want, as has been suggested by some.
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<tr>
<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs Peach</td>
<td>713</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MIN 7B</td>
<td>If a significant number of houses were moved from Witney to Carterton, Carterton would encounter significantly more growth per capita than Witney. Carterton could not sustain such growth without further major incursion into open countryside in neighbouring parishes (over and above that already caused by Shilton Park, Carterton North and Carterton East in Brize Norton and Shilton Parishes), which CPRE considers unacceptable.</td>
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<tr>
<td>MM473</td>
<td>Stop Carterton West</td>
<td>Mr Munro</td>
<td>1176</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 118</td>
<td>We welcome the proposition that the identification of good development opportunities within Carterton should be prioritised, and agree that redevelopment of MOD housing is important to the successful progress of Carterton as a thriving town.</td>
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<tr>
<td>MM505</td>
<td>Verena Hunt</td>
<td>Miss Hunt</td>
<td>1249</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 118</td>
<td>I endorse the factual updates regarding Carterton. Previous large scale development in this location has led to the creation of dormitory estates; with the subsequent large increase in vehicular movements on the surrounding, unsuitable rural road network. Any additional development here should be within the existing built up area of the town rather than continued urban sprawl into the surrounding open countryside.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2248</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 118</td>
<td>Paragraph 9.3.6 states REEMA North with provide 200 new homes; whereas 9.3.35 states 9.3.36: 300 on REEMA north and 200 on REEMA central) – how many units are proposed for REEMA North? Also check 9.3.50 is correct?</td>
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<tr>
<td>MM792</td>
<td>Alvescot Parish Council</td>
<td>Mrs Hoad</td>
<td>2324</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 118</td>
<td>Main 118: paragraph 9.3.36 Prioritising the identification of good development opportunities within Carterton is to be welcomed.</td>
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<tr>
<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs Peach</td>
<td>717</td>
<td>&gt; SECTION 9 - STRATEGY</td>
<td>9.3.11</td>
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Unsound as this does not identify the true location of the fire station.
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<th>Respondent Title</th>
<th>Respondent Surname</th>
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<tr>
<td>MM403</td>
<td>Minster Lovell Parish Council</td>
<td>Minster Lovell Parish Council</td>
<td>Mrs</td>
<td>Doughty</td>
<td>891</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 118 Unsound as incomplete record of potential employment sites. 9.3.32 Unsound as it does not identify the true location of the new primary school.</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1106</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MIN 79 Historic England welcomes and supports the amendment to paragraph 9.3.39 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
</tr>
<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1502</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MIN 79 CPRE feels that the focus in Carterton should be to strengthen the core of the town. Therefore, CPRE is supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across the 2 sites. Therefore, CPRE supports clauses 9.3.5-9.3.6, 9.3.36 &amp; 9.3.50. However, the REEMA areas cover 146 acres in total. The last information from the MOD indicated that 742 SFA homes are needed, which at the usual JSP density of 12 per acre, will require 62 acres, leaving 84 acres spare. North and Central areas cover approximately 70 acres (22 at REEMA North and 48 at REEMA Central), so the allocation of 300 houses in addition to the existing 200 is modest, even accounting for some retail or leisure land. CPRE also feels that there is likely to be potential in other REEMA areas in the town and it now appears that past claims of increasing housing need generated by RAF Brize Norton were unfounded. The existing houses are at an approximate density of 6 homes per acre, as they are not well-planned. Therefore, no further expansion of the town should occur until these sites achieve their potential and any future development in Carterton should be focused at REEMA. It is clearly preferable to development on open countryside and CPRE agrees with WODC that it will improve the style and image of the town. It is development that would lead to clear betterment and would be likely to be well supported in the community. In line with the need, mostly apartments and small homes should be built, with a few larger gateway properties for kerb appeal. Some housing for the elderly would be beneficial. That means that the density could be relatively high, in line with most town centre developments. It would not be unreasonable to expect a density of 20-30 per acre or 50-75 per ha to be achieved in line with other mixed developments in the area, giving a total potential of at</td>
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least 1,680 homes in REEMA North and Central areas alone, based on 50 units per ha. In fact, Carterton has the least infrastructure and facilities of the three main towns and lags behind in terms of employment opportunities, as noted in the Draft Local Plan clauses 2.26, 9.3.10, 9.3.39 & 9.3.42. There is a pre-existing imbalance between numbers of jobs and homes/workers, meaning that out-commuting is high. It’s the furthest from Oxford and has no A road access. There is mention in 9.3.15 and 9.3.67 of upgrading the B4477 in Brize Norton to an A road at a cost of £3.9M, but clauses 7.48 & policy T2 are vague about funding. It appears that there is no firm commitment or allocated funding. It is not clear either where the £7.2M for westbound slips onto the A40 will come from at Minster Lovell. Carterton should not therefore be seen as the obvious place to put any houses that other areas do not want, as has been suggested by some.

If a significant number of houses were moved from Witney to Carterton, Carterton would encounter significantly more growth per capita than Witney. Carterton could not sustain such growth without further major incursion into open countryside in neighbouring parishes (over and above that already caused by Shilton Park, Carterton North and Carterton East in Brize Norton and Shilton Parishes), which CPRE considers unacceptable.

If the proposed modifications seek to emphasise that Carterton is notable for an imbalance between employment within the sub-area and the economically active population, identifying an out-commuting rate of 60%, which is characterised as relatively high. However this should be set in the context of the District as a whole, the eastern areas of which have a strong functional relationship with Oxford in economic terms, and from where around 50% of the District’s economically active residents commute out of the District to work62. In respect of the parish of Carterton, this corresponds closely to the boundary of the urban area and displays a relatively high percentage of people travelling less than 2km to their place of work (34.8%), compared to the County (22.8%) and national (20%) averages63(Appendix 7). The implication therefore that the Carterton urban area displays a peculiar imbalance between homes and jobs and consequently should be demoted as a location for additional housing growth is considered to be misplaced. However, even if this premise is accepted the status of Carterton within the settlement hierarchy as a Main Service Centre (to which growth will be directed) does not align with the approach now set out within the proposed modifications. The approach is unjustified and inconsistent having regard to the SA process and the role of the Carterton in the settlement hierarchy. The modification at 9.3.44 also betrays the inconsistencies in the approach to planning for growth at Carterton by listing only non-strategic scale site allocations in Table 9.2, based on the proclaimed imbalance between homes and jobs, before advising that further housing sites will be identified through any subsequent review of the Local Plan (without making this contingent upon the delivery of employment growth at the settlement).

7.2 Table 9.2 should be amended to include strategic scale housing growth (in the form of SDA development) at West Carterton consistent with the SA Option 2 strategy and with the role of Carterton as a Main Service Centre.
CPRE feels that the focus in Carterton should be to strengthen the core of the town. Therefore, CPRE is supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across the 2 sites. Therefore, CPRE supports clauses 9.3.5-9.3.6, 9.3.36 & 9.3.50.

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In fact, Carterton has the least infrastructure and facilities of the three main towns and lags behind in terms of employment opportunities, as noted in the Draft Local Plan clauses 2.26, 9.3.10, 9.3.39 & 9.3.42. There is a pre-existing imbalance between numbers of jobs and homes/ workers, meaning that out-commuting is high. It’s the furthest from Oxford and has no A road access. There is mention in 9.3.15 and 9.3.67 of upgrading the B4477 in Brize Norton to an A road at a cost of £3.9M, but clauses 7.48 & policy T2 are vague about funding. It appears that there is no firm commitment or allocated funding. It is not clear either where the £7.2M for westbound slips onto the A40 will come from at Minster Lovell.

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<td>AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 119</td>
<td>2.43 Table 9.2 sets out the anticipated housing delivery in the Carterton Sub-Area. The Sub-Area has been set an indicative housing requirement of 2,600 new dwellings to assist in meeting the District wide requirement of 13,200 new dwellings. As is clear from Table 9.2 the Plan as currently drafted, including the proposed new allocations in the Sub-Area, would deliver only 2,552 dwellings in the Sub-Area.</td>
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<td>2.44 Clearly therefore not only is the overall Plan failing to make adequate provision for its housing requirement this is also specifically the case within the Carterton Sub-Area. As discussed above in relation to the overall housing land supply, it is important that the Plan not only makes sufficient provision to meet the objectively assessed need for the District but also, as required by the NPPF, allows sufficient flexibility to allow for changing circumstances.</td>
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<td>2.45 Whilst additional housing could be provided for through Neighbourhood Plans there is no guarantee of this, and no mechanism in place in the policy should they not deliver. Currently the only Neighbourhood Plan under preparation in the Sub-Area is in relation to Shilton and as at an early stage of preparation having only been designated on 5th October 2016. Shilton is not an identified settlement in the Council’s settlement hierarchy and has also not been assessed in the Council’s Settlement Sustainability Report (November 2016) and as such is classified as a hamlet or open countryside. Clearly therefore given the settlement’s scale and poor sustainability it is unlikely that the settlement would be capable of accommodating any development of real significance.</td>
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<td>2.46 Within the Sub-Area Carterton is the only Main Service Centre and Bampton is the only Rural Service Centre. The only currently proposed allocations in the Sub-Area are at Carterton. A number of existing commitments are also identified in the Sub-Area the majority of which are already Carterton, although 160 dwellings are identified at Bampton and a further 79 are identified at Aston. Aston is identified as a village in the Council’s settlement hierarchy and is ranked 28th in the Council’s Settlement Sustainability Report (unweighted).</td>
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<td>2.47 In light of the above comments regarding the housing supply at both a District and Sub-Area level, in order to make the Plan sound it is considered that additional allocations should be made and the potential for reserve allocations to be considered to allow additional flexibility. Bampton is recognised by the Council as a sustainable settlement in the Council’s proposed settlement hierarchy and this is supported by its ranking in the Settlement Sustainability Report. Currently Bampton is the only settlement in the top two tiers of the settlement hierarchy which is not proposed to receive an allocation. This is despite proposed paragraph 5.21b stating that: “The rural service centres of Bampton, Burford and Charlbury will also be required to make provision for new housing with existing commitments being complemented by a number of site allocations.”</td>
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<td>2.48 Whilst it is acknowledged that a development of 160 new homes is currently under construction to the north of New Road by CALA Homes, it is considered that the sustainability of Bampton, as recognised in the grant of that permission and in the Settlement Hierarchy study, would allow it to accommodate additional development</td>
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beyond that already committed. The Council’s pre-application advice response (Appendix One) in relation to our client’s site at Aston Road/Mount Owen Road, Bampton acknowledged that:

“As a rural centre, consideration is being given to the scope for further development at Bampton. However, the Council would prefer to see new development being delivered on a plan-led basis, rather than through ad hoc planning applications.”

2.49 No in principle objections were received to development at Bampton in general but it was the form, scale and location of such development which was a matter for further consideration. At this time, no substantive technical objections have been received on the application.

2.50 As set out in the Planning Statement (Appendix Two) which accompanies the planning application for development of our client’s site, the development potential of locations to the south and west of Bampton are constrained by flood risk, whilst areas to the north are more sensitive in landscape terms. It is therefore considered that land to the east of Bampton represents the only viable location to accommodate development at the settlement, which it must be remembered is in the second highest tier of settlements in the District after only Witney, Carterton and Chipping Norton, and the only settlement within these top two tiers where development is not proposed.

2.51 The planning application for the development of the site at New Road/Mount Owen Road clearly demonstrates the suitability of Bampton as a location for development in general and the appropriateness of our client’s site in particular to accommodate this development. The range of studies that have been undertaken to support the planning application demonstrate that a high quality development will be achieved at the site, and that there are no environmental, technical or other reasons why planning permission should not be granted in this case. Further details of the proposals are provided in the Planning Statement at Appendix Two and Design and Access Statement at Appendix Three.

2.52 We are in the process of working through the technical responses received in respect of the application with both West Oxfordshire District Council and Oxfordshire County Council. The application clearly demonstrates that there is no harm as a result of the proposals which would significantly and demonstrably outweigh the substantial benefits which would be achieved. Whilst it is recognised that concerns have been raised locally regarding the ability of Bampton to accommodate additional development, the Council themselves have recognised the sustainability of the settlement and it is important to recognise that the allocations proposed through the Local Plan are to cover the plan period to 2031.

2.53 As such, and in light of the comments above regarding the Council’s housing supply, it is considered that land at Aston Road/Mount Owen Road, Bampton should be allocated for 160 new homes. This will ensure that the Plan makes adequate provision to meet the proposed housing requirement for the Sub-Area with some flexibility, as required by the NPPF, and will help to address the shortfall in the overall housing supply which the Plan as currently drafted anticipates. Furthermore given the scale of the proposed allocation and the associated lower up-front infrastructure requirements, when
compared to some of the proposed Strategic Development Areas in particular, the site will help to boost the Council’s five year housing land supply through early delivery and assist in meeting the backlog over the first five years as advocated by the NPPG. Allocation of the site will assist in ensuring the Plan is positively prepared, justified, effective and consistent with National Policy.

Carleton Sub Area

Objection is raised to MM119 in that despite the draft Plan recognising that Carleton is a sustainable location for development for new homes (Paragraph 9.3.41), the change to Paragraph 9.3.42 is of concern in light of the fact that recent jobs growth (since the 2011 Census) linked to changes at RAF Brize Norton has not been taken into account by West Oxfordshire District Council in determining housing land allocations in the vicinity of Carleton. Since 2011 there have been an additional 2,500 jobs created at RAF Brize Norton with Carleton being identified as a main area for service men and women to live (10 - 15% of reservations at Swinbrook Park have been from service personnel) Economic activity is high within Carleton and the town has a vital role within the District as a whole.

Despite this, the Council appear to not favour further growth due to erroneous assumptions on the imbalance between the number of jobs and economically active people in Carleton. For the reasons set out elsewhere in these representations, Carleton should be a focus for new housing given its role and relative lack of higher order constraints to development. This is underscored by the failure to recognise the expansion effect of RAF Brize Norton and the economic role Carleton already plays, which needs to be complemented by the provision of new homes. The suitability of Carleton for sustainable growth was recognised in the Sustainability Appraisal which accompanied the submitted Local Plan. In the joint statement of common ground agreed between WODC and Bloombridge Development Partners (doc ref: WOLP32) dated 28th October, 2015, it was common ground that: “WODC acknowledges that as set out in Bloombridge’s representations, this percentage share for Carleton did not take into account the jobs at RAF Brize Norton, located within this sub-area.

In particular, the job numbers used in the snapshot report (including Figures 2.14 and 2.15) were based on BRES data which excludes HM forces personnel. Given that Carleton is home to RAF Brize Norton, the parties agree that this represents an important omission.

In response to this issue, the Council asked its consultants to prepare a short addendum, published in April 2015 (ECONa) This was submitted alongside the original report and other background Local Plan documents.”

The WODC Economic Snapshot report January 2015 states that:

“One area that needs further investigation is the potential impact of increased activity at Brize Norton. The likelihood and quantum of this are not known at this stage, but there is the potential for a significant impact on the Carleton and Witney markets.’

The WODC Economic Snapshot Addendum report (April 2015) confirms that:

“Figure 2.15 from the West Oxfordshire Economic Snapshot report shows the share of Employment and Economically Active Workers in the District by Sub Area. This graph shows a significant excess of economically active workers over jobs for Carleton. The data for jobs and workers are taken from different data sources and as noted in subsequent paragraphs the
employment figures for Carterton ‘may not reflect the full extent of MoD activity in the sub area’.

Using workplace employment data from the Census we are able to provide a comparison which does include HM Forces employment at Carterton as recorded by the Census.

Reproducing Figure 2.15 using Census Workplace data for employment instead of the BRES data used in the original report shows a larger share of the district’s jobs as being located in Carterton at 21.3% compared to 24.0% of the district's economically active residents who live in the Carterton sub area."

However, it is considered that the 2011 Census workplace number remains an under-estimate of the number of jobs currently available in the Carterton sub-area. We consider that the re-location of personnel to RAF Brize Norton since 2011 following the closure of RAF Lyneham (in July 2011, i.e. after the Census Date) and other MOD initiatives designed to stimulate jobs in the private sector (e.g. RAF Brize Norton’s Programme Gateway) are both key factors that have served to increase job numbers in the Carterton sub-area beyond the 10,264 jobs referred to in Table 1 of the Statement of Common Ground signed between Bloombridge and the Council (WOLP32). WODC acknowledges that since 2011 there may have been a modest increase in job numbers associated with RAF Brize Norton but considers that the 2011 Census data remains robust for planning purposes. We cannot see any sound, statistically based evidence to support WODC’s conclusion here - the April 2015 Update used Census data, but the 2,500 jobs are excluded from the Census. The resultant changes in the housing-jobs balance for Carterton remain an omission that goes to the heart of the spatial strategy and the distribution of housing. There are very serious soundness concerns here.

The jobs created since July 2011 are not captured in the 10,264-figure identified by the Council’s evidence. As a minimum, an additional 1,400 jobs should be added to take account of the move of the C130 Hercules from RAF Lyneham in July 2011 (i.e. after the Census Date), with more jobs associated with the remaining units at Lyneham, plus the Air Tanker Hub and the Airbus National Training Centre, since July 2011. This is estimated to comprise approximately 2,500 new jobs for the Carterton subarea since the Census Date (27 March 2011). This is exciting and dynamic economic change which should be recognised in the draft Plan.

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The Town Council’s Master Plan for Carterton seeks to deliver a Vision for the town which includes:
1. Delivery of a vibrant and attractive town centre;
2. Provision of a full range of services and facilities for the community;
3. Creation of attractive public spaces;
4. An increase in employment opportunities by identifying new sites to complement housing growth;
5. Delivery of sustainable planned growth and improved connectivity to the town centre.

The Master Plan supports the growth of North Carterton and seeks the provision of new facilities in including a hotel, sporting facilities, a new cemetery, allotments, new public spaces, medical facilities, a day and community centre and public transport improvements.

It is clear that to reflect the ambition of the Town Council, to respond to the expansion of RAF Brize Norton and the economic role Carterton already provides, and to ensure the delivery of much needed new homes in a sustainable and comparatively affordable location, there is significant benefit to the delivery of residential led development to the north of Carterton. At present the plan is not positively prepared in respect of its proposals for the Carterton sub-area and is not justified using proportionate evidence.
Objection is raised to MM119 in that despite the draft Plan recognising that Carterton is a sustainable location for development for new homes (Paragraph 9.3.41), the change to Paragraph 9.3.42 is of concern in light of the fact that recent jobs growth (since the 2011 Census) linked to changes at RAF Brize Norton has not been taken into account by West Oxfordshire District Council in determining housing land allocations in the vicinity of Carterton. Since 2011 there have been an additional 2,500 jobs created at RAF Brize Norton with Carterton being identified as a main area for service men and women to live (10 - 15% of reservations at Swinbrook Park have been from service personnel). Economic activity is high within Carterton and the town has a vital role within the District as a whole.

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<th>MM786</th>
<th>Oxfordshire County Council</th>
<th>Amada Jacobs (OCC)</th>
<th>Mrs Jacobs</th>
<th>2198</th>
<th>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton</th>
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In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.
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<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2220</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 119</td>
<td>The needs of proposed housing growth in Carterton can be met through expansions of existing, or the planned new, schools.</td>
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<td>MM792</td>
<td>Alvescot Parish Council</td>
<td>Alvescot Parish Council</td>
<td>Mrs</td>
<td>Hoad</td>
<td>2325</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 119</td>
<td>Thank you for inviting me to comment on the proposed new Local Plan. I realise that there is a great need for housing, and I see that the proposed number that WODC is required to find sites for has increased from 10500 to 15950. This seems a very large increase, and for all it may be needed, locating it sensibly is very important. I would like to comment on the development near to Carterton. I am aware of planned development to the East of Carterton within Brize Norton Parish. This is for 700 houses and other proposals to build on previous housing sites or brown field sites seem sensible. However, any other large scale plans, for example to the North on Kilkenny farm or Foxbury farm I feel should be considered very carefully. I was advised that these would probably never be approved as sites, as that would be building on open farmland and would be against policy. However, one is aware that policies change, and this may no longer be the case. However, I believe that housing should be built where it is needed, or as close as possible. When one sees the constant stream of cars leaving Carterton from about 6.15 each morning to get down the A40 before it jams, one realises that Carterton has possibly become a dormitory town for people working far away. I suspect that there has been very little real growth in jobs within the town, and really would firms want to locate there when there is Witney so nearby? Therefore, by building large numbers of housing in Carterton may not help the terrible transport problems that the county suffers at present. Finally on the subject of Carterton, by building to the North or North East of the town within Brize Norton Parish, where the houses will be so far from the centre of the town will probably produce a satellite enclave where people may choose to shop etc in Witney, as it has more to offer, and therefore this will only cause more and more use of cars which is against the</td>
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| MM224         |                         | Hugh Williams   | -                | Williams          | 428        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 119 | I have written on a few occasions in the past regarding the slow strangulation of the countryside as urban sprawl continues to be given favour.  
There must surely come a time where the powers that be actually take into consideration the DUTY OF CARE that they have to the countryside & also the people who live there.  
There are numerous areas on BROWNFIELD LAND available (nb. in the UK generally) which should be fully considered before any permissions are even considered on GREENFIELD LAND.  
Proposed Schemes: Alvescot Downs (Carterton West) and development of the land north of Carterton in Brize Norton Parish  
From the attached (West Oxfordshire District Council Census 2011) you can see that the Carterton population rose from 11,805 in 2001 to 15,769 in 2011.  
An increase of circa 25% in 10 years.  
I understand that both Crest Nicholson and Christchurch College are moving to push their respective (& somewhat sizeable) schemes forwards - collectively 2,400 new dwellings (1,200 units each).  
Taking an average household of 3 people (not an especially high figure) this would amount to a further 7,200 people. In short, from the 2011 figure (population of 15,769) this would suggest a population increase in the order of just over 45% in just two schemes. This is simply not sensible & has to be wholly unsustainable with the infrastructure in place?  
In the strongest possible terms I would suggest that any substantial scheme on the (presumably) green belt land to the west of Carterton/north of Alvescot would be a mistake that the locale would not recover from.  
Once this land is built on it is blighted in perpetuity.  
Notwithstanding the obvious environmental impact the actual physical construction of such a scheme would trigger, the exponential traffic increase, light/noise pollution and pressure on services would be extraordinary - to Shilton, Alvescot & in fact Carterton.  
Having lived in Shilton for 7 years now it has not once escaped my attention that certain existing and rather dilapidated BROWNFIELD LAND sites in central Carterton are very much in need of bringing up to modern standards where road infrastructure and services (i.e. power, water, electricity) are already in place. This seems so obvious to me but perhaps this is more expensive to develop and therefore has a considerable bearing on House Builders, their Residual Valuations and ultimately their 20% DEVELOPER’S PROFIT?  
Please be assured this is not a “NIMBY” approach, it simply strikes me that there are far better existing & more appropriate sites in the existing built-up areas of Carterton that would hugely benefit from an injection of capital & sensible planning/regeneration rather than Carterton simply bleeding out into another field when there is utterly no need to do so whatsoever.  
There is a perception that Carterton needs to grow as Brize Norton has become the main MOD hub. If other MOD stations have closed down does that not provide immediate land on which to build 2,000+ new homes if... |
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1529</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carteron Sub Area &gt; MAIN 120</td>
<td>construction in central Carterton hits the cash-flow too hard? If major development continues at the current rate what happens in 5-15 years’ time when the precedent has been set? Does Carterton simply expand until it’s merges with another area that has made the same irreversible mistakes? At what stage do Carterton &amp; say Bampton become Carterton-cum-Bampton? As a Chartered Surveyor of some 25 years’ experience I will be keenly interested to see how this matters progress. There are many basis upon which to vote against sizeable urban sprawl in the countryside. The environmental aspect is one which I have not laboured here but is certainly worth flagging. To cover existing open (greenfield) land with 2,400 dwellings, associated roads, driveways, services etc is not an environmentally smart move. To then power them in perpetuity thereafter even less so. In summary, I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘North Carterton’ in Brize Norton.</td>
</tr>
<tr>
<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs</td>
<td>Peach</td>
<td>701</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carteron Sub Area &gt; MAIN 120</td>
<td>CPRE believes that the windfall allowance stated in 9.3.48 of 262 for the sub-area in 15 years is modest, especially in view of the REEMA potential, plus opportunities that may arise with town centre retail redevelopments.</td>
<td></td>
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| MM741         | CPRE Oxfordshire        | Helen CPRE Oxon | Mrs | Marshall | 1485 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carteron Sub Area > MAIN 122 | CPRE feels that the focus in Carterton should be to strengthen the core of the town. Therefore, CPRE is supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across the 2 sites. Therefore, CPRE supports clauses 9.3.5-9.3.6, 9.3.36 & 9.3.50. However, the REEMA areas cover 146 acres in total. The last information from the MOD indicated that 742 SFA homes are needed, which at the usual JSP density of 12 per acre, will require 62 acres, leaving 84 acres spare. North and Central areas cover approximately 70 acres (22 at REEMA North and 48 at REEMA Central), so the allocation of 300 houses in addition to the existing 200 is modest, even accounting for some retail or leisure land. CPRE also feels that there is likely to be potential in other REEMA areas in the town and it now appears that past claims of increasing housing need generated by RAF Brize Norton were...
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<tr>
<td>MM776</td>
<td>Sterling Rose</td>
<td>Matt Corcoran</td>
<td>Mr Corcoran</td>
<td>unfounded. The existing houses are at an approximate density of 6 homes per acre, as they are not well-planned. Therefore, no further expansion of the town should occur until these sites achieve their potential and any future development in Carterton should be focused at REEMA. It is clearly preferable to development on open countryside and CPRE agrees with WODC that it will improve the style and image of the town. It is development that would lead to clear betterment and would be likely to be well supported in the community. In line with the need, mostly apartments and small homes should be built, with a few larger gateway properties for kerb appeal. Some housing for the elderly would be beneficial. That means that the density could be relatively high, in line with most town centre developments. It would not be unreasonable to expect a density of 20-30 per acre or 50-75 per ha to be achieved in line with other mixed developments in the area, giving a total potential of at least 1,680 homes in REEMA North and Central areas alone, based on 50 units per ha. Thank you for notifying us on the updated main modifications for the new WODC local plan. Sterling Rose are working with the landowners to bring the site forward for comprehensive and viable residential led development. As a starting point, advice in the Framework (para 157) states – * Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework. * 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; Please can I also point WODC in the direction of para 182 which states – Plans should be, * Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Sterling Rose support WODC in preparing a new Local Plan and in doing so support the principles of the policy CA1a. However, some comments below and attached are suggested with track changes to the draft policy. From a review of the emerging Local Plan technical evidence base, we believe that this site will make a very positive contribution to much need housing requirements in the District. Furthermore, the delivery of this site will help to ease the pressure of development on more sensitive Green Belt and AONB sites. To that end, the revised Masterplan (attached) has been submitted to WODC as part of on-going pre-application discussions. The proposal includes the following quantum of development. Masterplan: * Houses -86 units in a mix of 2, 3 and 4 beds. * Apartments – 164 units in a mix of 1 and 2 bed flats and 3 and 4 storey blocks * Care Home -80 bed facility- slightly enlarged floorplate from the scheme that was consented.</td>
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> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 125 |
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| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs | 2199 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 125 | * Pub – single/2 storey pub with associated car parking aimed primarily as a “food pub”; perhaps similar to the Marstons type operation.  
* Nursery/Creche- small facility opposite the Care Home and sharing parking with the pub  
Total residential units: 250  
Design approach:  
We looked at maintaining the same road hierarchy and position within the site  
The inclusion of small apartment blocks within the body of the site mirrors the height that was proposed previously by the Cottsway Extra Care Scheme- we think a variety of design and height/orientation should make for a varied street-scene along the main estate road  
We have maintained just 2 storey housing along the north side of the estate road to ensure the scale of development does not impact on the existing properties on Milestone Road  
We think that the eastern portion of the site next to the Carterton Industrial Estate can accommodate detached apartment units provided the proposed structural landscaping belt to the eastern boundary is retained and a suitable internal building layout is developed to ensure habitable rooms do not face towards the industrial units.  
The Care Home would still be 3 storeys as the consented scheme and is positioned no closer to the western boundary with the caravan park than previously.  
The Milestone Road frontage was previously proposed to be infilled with chalet bungalow type supported living units; we think that a suitable massing for the proposed pub with the single storey element adjacent nos. 95a and b Milestone Road should work in terms of the street frontage- indeed we believe there is the potential to create a keynote/local landmark building that would lift the feel of Milestone Road. All pub servicing and car parking would be to the rear in a screened car park.  
Ecology and Natural Environment  
In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.  
The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.  
Carterton – REEMA  
There may be particular opportunities to integrate existing vegetation.  
Protected bat species may be present in the existing buildings. |
There are opportunities to create new green infrastructure that will benefit the town more widely. Investment in the adjacent Shill Brook Conservation Target Area should be sought to ensure that there is an appropriate gain in net biodiversity.

e) necessary supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development.

Stagecoach supports the renewed allocation of this previously developed site, that is directly served by the Company's core commercial Carterton-Witney-Oxford services. It is likely to benefit from any future service improvements, including Carterton and Witney to/from Oxford Eastern Arc, arising from the committed A40 Science Vale Transit Phase 1 Scheme (Eynsham P+R and bus lanes).

Stagecoach is well aware that the site has a long planning history, but that no delivery has yet commenced. We note that the combined quantum across the two sites remains about 500 dwellings, accounting for 200 units committed within the allocation. However we also are concerned that in practice the total number of units deliverable is likely to drop, from this and previous levels identified. While this may be consistent with DIO/Annington's current aspirations there is in our view a case to make this a minimum figure to allow flexibility for the promoters to be flexible in how this very sustainable site is brought forward, and for what housing tenures (including housing to need the needs of the Forces).

CPRE supports the inclusion of the Milestone Road site in 9.5.53a-c as an allocation. It’s a large site in a built up area. However, bearing in mind the past care home permissions, it is preferable that the site should include housing for the elderly if possible, which all forms part of the housing need. The sites would be best as mixed use. In that case a development density of 25 units per acre or 60 per ha has been achieved at similar sites in Witney (Buttercross). The capacity is therefore more like 360 units.

Land at Milestone Road

Main Modification 126 (paragraphs 9.3.53) introduces a new allocation south of Carterton. Albeit, the principle of the development had been established through previous applications including 12/1019/P/FP (93 extra care apartments), 12/1020/P/OP (105 open market homes). However, as identified in MM126, such applications have now been finally disposed of due to difficulties with regard to land assembly. It is considered that the scheme cannot be relied upon as a housing allocation. The site has been identified for these reasons to be removed from the 5-year supply assumptions in the recent West Oxfordshire Housing Land Supply Position Statement 2016, however, this remains an allocation with the assumption that a scheme can be approved and completed within the plan period.
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<tr>
<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>1945</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 126</td>
<td>It is considered unrealistic to assume that the development will not only come forward, but be completed within the plan period. If this site comes forward it should be treated as a windfall rather than a firm allocation. Accordingly, this proposed allocation should be deleted. Policy CA1a (MM128) and the corresponding map (MM127) should be deleted as the site is not deliverable.</td>
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</table>
| MM376         | Stagecoach Oxfordshire/Stagecoach West | Nick Small, Stagecoach Bus | Dr | Small | 908 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 126 | Land at Milestone Road
Main Modification 126 (paragraphs 9.3.53) introduces a new allocation south of Carterton. Albeit, the principle of the development had been established through previous applications including 12/1019/P/FP (93 extra care apartments), 12/1020/P/OP (105 open market homes). However, as identified in MM126, such applications have now been finally disposed of due to difficulties with regard to land assembly. It is considered that the scheme cannot be relied upon as a housing allocation. The site has been identified for these reasons to be removed from the 5-year supply assumptions in the recent West Oxfordshire Housing Land Supply Position Statement 2016, however, this remains an allocation with the assumption that a scheme can be approved and completed within the plan period.

It is considered unrealistic to assume that the development will not only come forward, but be completed within the plan period. If this site comes forward it should be treated as a windfall rather than a firm allocation. Accordingly, this proposed allocation should be deleted. Policy CA1a (MM128) and the corresponding map (MM127) should be deleted as the site is not deliverable. |
| MM376         | Stagecoach Oxfordshire/Stagecoach West | Nick Small, Stagecoach Bus | Dr | Small | 1021 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 127 | MAIN 126-128 POLICY CA1a and supporting paragraphs

Land off Milestone Road, Carterton

The site has been subject for many years to live but undetermined applications, which have now been disposed of.

Stagecoach supports the re-affirmation that this site is appropriate, as it is also one of the most sustainable in the District, being among other things, within easy reach of Carterton town centre and the bus services available there. |
| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs | 2201 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | Ecology and Natural Environment

In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape |
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2250</td>
<td>&gt; CARTERTON SUB AREA &gt; MAIN 128, and visual impact assessment will be undertaken including surveys for protected and threatened species. The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary. Carteron – Milestone Road A high level of green infrastructure provision is required to counterbalance health impacts of noise and air pollution from nearby runway operations. Given the character and location of the site there is a significant opportunity for this site to contribute to enhanced green infrastructure provision within the town. There is likely to be a significant loss of local biodiversity if development intensity is high.</td>
<td>b) provision of satisfactory vehicular accesses from Milestone Road via a through road and appropriate pedestrian and cycle connections; e) necessary supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development. The County Council has experienced significant difficulties in securing appropriate mitigation measures for the impact of strategic development areas where portions of the site have come forward as separate planning applications. To help reduce the occurrence of this issue we propose this additional text: The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.</td>
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<tr>
<td>MM417</td>
<td>Education Funding Agency</td>
<td>Samantha Powell</td>
<td>Ms Powell</td>
<td>927</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; CARTERTON SUB AREA &gt; MAIN 128, The approach given to the identification of individual allocations (as set out under the relevant sub-areas within chapter 9) and their associated policies is strongly supported. Where relevant, individual policies require the provision of schools as part of the wider allocated development, including the number and size of schools required (for example Main Modifications 103, 140 and 155). Where the proposed housing numbers do not trigger the need for a new school, the policy requires appropriate provision of or a contribution to the necessary supporting infrastructure (for example Main Modifications 128 and 131). This approach is supported by the EFA. You will have no doubt taken account of the key strategic policies to reiterate this position, including securing developer contributions through s106 and CIL, but it would be helpful if they were explicitly referenced within the document. In particular, as below: The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). The EFA support the principle of safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. Support is also given for the siting of schools within the allocated sites in locations which promote sustainable travel modes for pupils, staff and</td>
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visitors. There is also a need to ensure that the education contributions made by developers through the Community Infrastructure Levy are sufficient to cover the increase in demand for school places that is likely to be generated by a development. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.

West Oxfordshire District Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on ‘Planning for Schools Development’ (2011) which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system.

Overall, the EFA commends the main modifications proposed. They seek to ensure that adequate future education provision across the district is provided.

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<tr>
<td>MM424</td>
<td>Natural England</td>
<td>Marc Turner</td>
<td>Mr</td>
<td>Turner</td>
<td>946</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carton Sub Area &gt; MAIN 128</td>
<td>Milestone Road Carterton Planning applications will need to include an assessment of indirect impacts on Alvescot Meadows, this should be highlighted in the policy for this site.</td>
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1566</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carton Sub Area &gt; MAIN 129</td>
<td>With regard to the Swinbrook Road development outlined in 9.5.53d-f, CPRE feels that there should be a road link from REEMA North to the central area between the new David Wilson northern developments and Shilton Park, so that there is a better link for the associated residents with the town centre (as currently, access is convoluted, so the developments feel like satellites), but also so that access to the Country Park is opened up as a facility to benefit the whole town. There appears to be an appropriate corridor of land running from the corner of REEMA North and along the Shilton Park boundary. Only a short section of road would be needed to improve the relationship between these new developments and the town, avoiding the current satellite feel. It would run from the north western corner of REEMA North and adjacent to Stocks Lane and Boundary Way.</td>
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<tr>
<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>1960</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carton Sub Area &gt; MAIN 129</td>
<td>Land at Swinbrook Road MM129 proposes an allocation for 70 homes, a previous planning application for 66 homes (promoted by David Wilson Homes Southern, our client) has been disposed of and suffers from land delivery concerns. The proposed allocation site has been identified for these reasons to be removed from the 5-year supply assumptions in the recent West Oxfordshire Housing Land Supply Position Statement 2016, however, this remains an allocation within the plan period. It is considered that this site may be treated as a windfall site but should be not relied upon as an allocation. Accordingly, this proposed allocation should be deleted. Policy CAIb (MM131) and the corresponding map (MM130) should be deleted as the site is not deliverable.</td>
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| MM752         | Bloombridge             | Bloombridge     | Mr               | Cutler            | 1961       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | Land at Swinbrook Road MM129 proposes an allocation for 70 homes, a previous planning application for 66 homes (promoted by David Wilson Homes Southern, our client) has been disposed of and suffers from land delivery concerns. The
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<tr>
<td>MM262</td>
<td></td>
<td>Lois Stock</td>
<td>Mrs Stock</td>
<td>475</td>
<td>&gt; Carterton Sub Area &gt; MAIN 129</td>
<td>proposed allocation site has been identified for these reasons to be removed from the 5-year supply assumptions in the recent West Oxfordshire Housing Land Supply Position Statement 2016, however, this remains an allocation within the plan period. It is considered that this site may be treated as a windfall site but should not be relied upon as an allocation. Accordingly, this proposed allocation should be deleted. Policy CAlb (MM131) and the corresponding map (MM130) should be deleted as the site is not deliverable.</td>
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Dear Planning Policy

Ref: Main 119, Main 126-129 - Land at Milestone Road, Carterton, proposed 200 homes.

I write concerning the above site and the proposal that it is designated for a development of 200 homes, including some that are affordable. This site was previously granted permission for the development of a care homes and individual bungalows, however this was not built (despite promises made at the planning committee meeting that I attended; that it would be built and the older people moved into it by November of that year!). You own consultation document makes it clear that owing to difficulties with land assembly, these permission have now been disposed.

In order to develop this site you must assume that the difficulties with land assembly have gone away, but you do not make it clear how they are to be overcome. Until they are, I would suggest that no housing development could take place on this site.

I would question the suitability of this site for any sort of development, given that it is more of less "land locked" of three sides. It is bounded by the Brize Norton airfield at the back, and any development would be very close to the runway so that noise mitigation measures would need to be in place for any dwellings. There are only two places where the land in question touches Milestone Road, and one of those already has buildings on it (I think the old Doris Watts Care home).

The idea of 200 homes - at least 200 cars and possibly 400 or even more - exiting onto Milestone Road is ridiculous. Milestone Road is already used as a rat run for traffic going to and from Brize Norton via Gate 1 at the end of Black Bourton Road. An increase in traffic will be unbearable for local residents. Added to which, Milestone Road is a minor road. It has a terrible surface, despite some top dressing last year, and will need a significant upgrade to cope with the traffic.

I am also concerned that this proposal means that those people who live on that side of Milestone Road are going to find themselves surrounded by a housing development. This is not a pleasant prospect for those residents.

Milestone Road contains, I suspect, fewer than 200 homes, this proposed development will double that number and there will be a commensurate impact on infrastructure such as drains and sewage; possibly electricity and broadband unless allowance is made for this. The proposed density of 200 homes is far too high for this site and the local area.

I have noted that work to upgrade the electricity supply has already taken place as a new sub station has been installed, presumably to allow for development at this site. I find this concerning that provision is being made when no agreement has been reached and when the draft local plan states that this site is anticipated for long term development. If that is so, then why has a new sub station appeared in the last week?

I understand why this site has been considered for residential development, but if it should go ahead, I would suggest that:-
1. The density of housing should be much lower;

2. Given the number of bungalows and caravans in the immediate vicinity, the emphasis should be on single storey dwellings at the front of the site where it comes close to Milestone Road and along the boundary with the caravan park. This is to avoid overwhelming bulk and massing impacting on the street scene and neighbouring properties.

3. Taller properties should be at the rear of the site where it has a boundary with the air base, and they should be no taller that the existing building that is on the air base along this boundary. (And yes, I know you are going to say that these details will be covered by the planning application when it is made.)

In summary my concerns are density of development, access to Milestone Road, pressure on infrastructure, increased traffic and potential congestion.

Lois Stock

2 Whittington Place

Carterton OX18 3QL

(My property fronts onto Milestone Road as it is on the corner of Milestone Road/Whittington Place).

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Stagecoach strongly supports this allocation. Although the site is not currently within easy reach of existing frequent commercial bus services, it adds logically to a critical mass of committed development around the northern flank of the town, which is likely to support the future development of the commercial bus network in Carterton in the reasonably near future. There are three potential credible means by which bus services might be extended/diverted or enhanced in this area: via Shilton Park and Elmhurst Way; a local loop terminating in the Swinbrook Road/Shilton Road area; or enhancement of services between Carterton and Burford should this route prove to be commercially sustainable in the longer term.

Policy CA1b b) Provision for satisfactory vehicular access to Land at Swinbrook Road:

Stagecoach supports the specific requirement that suitable vehicular access is achieved for this land to come forward. In line with the requirement in NPPF para 17 and 29 that transport systems should be balanced in favour of sustainable modes, Stagecoach advises that implementation of the previously-consented Bus-only link to south to Swinbrook Road (ref 13/1752/P/FP) is essential if this site and the wider area of committed and completed development is to have any access to bus services. The lack of such services today weighs significantly against the sustainability of the proposed allocation, as the nearest regular bus services are approaching a mile away.

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Our clients note that the Examination Inspector stated at paragraph 4.2 in his Preliminary Findings - Part 2 that the "3 value zones" approach to affordable housing provision adopted by the Council "was justified" at the time that he published his findings. However, he did state at paragraph 4.1 that it was likely that the viability evidence would need to be updated before the Examination is re-opened and at paragraph 4.2 that "the boundaries between the 3 zones could have been drawn differently." Our clients would endorse these comments and in the absence of any updated evidence from the Council, the company reserves its position.
**Comment ID**: MAIN 131

Regarding the soundness or otherwise of the “3 value zones” approach and the soundness or otherwise of the boundaries between the three zones. Accordingly, our clients would wish to take part in any hearing sessions at which these matters are discussed.

Our clients note that Policy H3 proposes a 50% rate in the “high value zone”, which includes Eynsham. This is higher than the percentage figure suggested for West Oxfordshire in the county-wide SHMA. That figure was 40%. It is also higher than the percentages adopted by neighbouring districts: in Cherwell the percentage in the adopted Local Plan is 30% or 35% depending on location; and in the Vale it is 35% across the district. In the absence of any updated evidence from the Council to justify 50% affordable housing provision in the “high value zone”, our clients reserve their position regarding the soundness or otherwise of the Council’s approach and would wish to take part in any hearing session at which this matter is discussed.

The previous points notwithstanding, our clients welcome the acknowledgment in Policy H3 that the level of affordable housing to be provided on qualifying sites will be subject to viability testing. This is essential in dealing with large strategic sites such as the West of Eynsham SDA where there is a significant amount of infrastructure to provide. In this regard, our clients note also that at paragraph 4.2 in his Part 2 Preliminary Findings the Examination Inspector made the point at his paragraph 4.2 that:

> "Later hearings will need to assess whether the combination of affordable housing and infrastructure requirements and the proposed CIL charge are justified for particular locations."

**Comment (plain text)**

Ecology and Natural Environment

In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

Carterton – Swinbrook Road

The existing landscape should be maintained and the development, if it proceeds should be integrated with Kilkenny Country Park and Kilkenny Lane to the east. Opportunities to improve water management and green infrastructure provision should be sought.

**Comment (plain text)**

b) provision of satisfactory vehicular access and appropriate pedestrian and cycle connections;

The County Council has experienced significant difficulties in securing appropriate mitigation measures for the impact of strategic development areas where portions of the site have come forward as separate planning applications. To help reduce the occurrence of this issue we propose this additional text:

The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.
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<th>Respondent ID</th>
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<tbody>
<tr>
<td>MM417</td>
<td>Education Funding Agency</td>
<td>Samantha Powell</td>
<td>Ms</td>
<td>Powell</td>
<td>928</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 131</td>
<td>The approach given to the identification of individual allocations (as set out under the relevant sub-areas within chapter 9) and their associated policies is strongly supported. Where relevant, individual policies require the provision of schools as part of the wider allocated development, including the number and size of schools required (for example Main Modifications 103, 140 and 155). Where the proposed housing numbers do not trigger the need for a new school, the policy requires appropriate provision of or a contribution to the necessary supporting infrastructure (for example Main Modifications 128 and 131). This approach is supported by the EFA. You will have no doubt taken account of the key strategic policies to reiterate this position, including securing developer contributions through s106 and CIL, but it would be helpful if they were explicitly referenced within the document. In particular, as below: The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). The EFA support the principle of safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. Support is also given for the siting of schools within the allocated sites in locations which promote sustainable travel modes for pupils, staff and visitors. There is also a need to ensure that the education contributions made by developers through the Community Infrastructure Levy are sufficient to cover the increase in demand for school places that is likely to be generated by a development. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. West Oxfordshire District Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development’1 (2011) which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system. Overall, the EFA commends the main modifications proposed. They seek to ensure that adequate future education provision across the district is provided.</td>
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<tr>
<td>MM473</td>
<td>Stop Carterton West</td>
<td>Mr</td>
<td>Munro</td>
<td>1178</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>Reference is made to the “Carterton Masterplan” asserting that three areas outside the town, including Alvescot Down, have some further development potential. We are not aware of any evidence that Carterton Town Council has adduced to support this claim. The status of the “Masterplan” as a planning document is ambiguous – is it for example part of the evidence base for the Local Development Framework? - and caution should be exercised in quoting it here. It is almost inevitable that any future review of the Local Plan will entail revisiting some alternative options, but the weight of evidence which has accumulated during the Local Plan process to date - as well as in considering a planning application - must surely militate against referring to land to the west of Carterton as a &quot;reasonable&quot; alternative.</td>
<td></td>
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<tr>
<td>MM636</td>
<td>Alexis Thompson</td>
<td>Ms</td>
<td>Thompson</td>
<td>1469</td>
<td>&gt; SECTION 9 - STRATEGY AT THE</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
<td></td>
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<td>Respondent ID</td>
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<tr>
<td>MM637</td>
<td></td>
<td>Charlie Stanley-Evans</td>
<td>Mr Stanley-Evans</td>
<td>1471</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I strongly object to any plans to develop Alvescot Downs known as 'Carterton West'.</td>
<td></td>
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<tr>
<td>MM638</td>
<td></td>
<td>Charlotte Ashby</td>
<td>Ms Ashby</td>
<td>1474</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>We are residents of Filkins, West Oxfordshire and would like it to be recorded that we support the Local Plan and particularly the section which rejects the development on Alvescot Downs known as ‘Carterton West’, which we would hope remains a firm policy of West Oxfordshire.</td>
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<tr>
<td>MM491 Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
<td>- Crest Strategic Projects</td>
<td>- Crest Strategic Projects</td>
<td>1475</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>7.3 The modification at 9.3.54 is unjustified having regard to the evidence and does not accurately or fully portray the strategic merits of allocating land at Carterton to meet development requirements during the current plan period. As is outlined elsewhere within this set of representations the rationale the Council has followed to determine its site allocation strategy is confused and does not align with the evidence base. The SA process has not been applied consistently, such that strategic options that are available at Carterton, and which would be in accordance with the proposed spatial strategy have not been selected for inclusion. Conversely, sites that are not aligned with the spatial strategy of the Local Plan, and which perform similarly or less well than the Carterton options against the SA criteria, have been included. The decision-making process followed is unclear and is not supported by the evidence base. As a consequence the Plan is unsound. 7.4 The unqualified undertaking that strategic scale development will be countenanced as part of a subsequent Plan review also does not reflect the rationale at 9.3.43, which requires realignment between homes and jobs in the town before further strategic residential development will be allocated. The approach to boosting employment within the town to a level that would rebalance this relationship is uncertain and indicates a lack of real determination or strategic thinking. It creates the impression that this factor is being used as a screen to preclude residential development. 7.5 Any reference to land west of Carterton being considered and rejected as an SDA within the current plan period should be deleted.</td>
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<tr>
<td>MM639</td>
<td></td>
<td>C N Carter</td>
<td>Mr Carter</td>
<td>1477</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt;</td>
<td>I write to support the Local Plan in the form now submitted to the Inspector. In particular I am pleased to note, and continue as in previous correspondence to support, its rejection of development on alvescot Downs known as “Carterton West”.</td>
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<tr>
<td>MM640</td>
<td></td>
<td>Clare Macer</td>
<td>Macer</td>
<td>1479</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West'.</td>
<td></td>
</tr>
<tr>
<td>MM641</td>
<td></td>
<td>Colin Barry-Smith</td>
<td>Barry-Smith</td>
<td>1480</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the local plan as now submitted to the inspector and in particular I support its rejection of development on Alvescot Downs known as Carterton West.</td>
<td></td>
</tr>
<tr>
<td>MM642</td>
<td></td>
<td>David Ricks</td>
<td>Ricks</td>
<td>1482</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I wish to express in the strongest possible terms my endorsement of the current Local Plan, with its rejection (following wide consultation and numerous iterations) of the proposed development of 1200 homes on Alvescot Downs. Such a development would be extremely harmful to the locality.</td>
<td></td>
</tr>
<tr>
<td>MM643</td>
<td></td>
<td>Denise Kemp</td>
<td>Kemp</td>
<td>1486</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the local plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and also on the area known as ‘North Carterton’ in Brize Norton.</td>
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</tr>
<tr>
<td>MM644</td>
<td></td>
<td>Diana Darlington</td>
<td>Darlington</td>
<td>1487</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector and in particular, I support its rejection of development on Alvescot Downs known as &quot;Carterton West&quot; and also on the area known as &quot;North Carterton&quot; in Brize Norton. Both proposed developments are totally out of keeping with this rural area. the local infrastructure is unable to cope as it is. May I suggest councillors travel along the A40 during the rush hour -ie any time after 4.00pm from Oxford and they will see the congestion that currently exists.</td>
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<tr>
<td>MM645</td>
<td></td>
<td>Diane Schultz</td>
<td>Schultz</td>
<td>1488</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt;</td>
<td>I support the Local Plan as now submitted to the Inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘North Carterton’ in Brize Norton.</td>
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<tr>
<td>MM646</td>
<td></td>
<td>D Martin</td>
<td>Mr</td>
<td>Martin</td>
<td>1490</td>
<td>MAIN 132</td>
<td>I support the West Oxfordshire future plan as it is with No planned housing for Alvescot Downs. I would like to make a suggestion about roads and that is the center of Carterton could surely use a lights controlled roundabout. The traffic Queues in the rush hours are extensive and really shouldn't happen in such a small town. I note that RAF Brize Norton traffic uses as many alternative routes as possible and that many cars leaving the Base do so at earlier and later times than spot on the hour, so they are obviously doing their bit, but I do think a very small change would result in much improved traffic flow in Carterton central. The problem, as I see it is that cars turning across the traffic (Right Turns) cause the hold-ups, so the change could simply be sequencing the traffic lights in a circular sequence rather than the current East-West / North South sequence.</td>
</tr>
<tr>
<td>MM647</td>
<td></td>
<td>Elaine Smith</td>
<td>Ms</td>
<td>Smith</td>
<td>1491</td>
<td>MAIN 132</td>
<td>I support the Local Plan as submitted, in particular it’s rejection of the development on Alvescot Downs, known as Carterton West.</td>
</tr>
<tr>
<td>MM648</td>
<td></td>
<td>FW and A Hudson</td>
<td>Mr and Mrs</td>
<td>Hudson</td>
<td>1493</td>
<td>MAIN 132</td>
<td>Both my Wife and Myself strongly support the Local Plan as now submitted to the inspector, and in particular we support the it’s rejection of development on Alvescot Downs known as “Carterton West”.</td>
</tr>
<tr>
<td>MM649</td>
<td></td>
<td>Gill Cox</td>
<td>MRS</td>
<td>Cox</td>
<td>1494</td>
<td>MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
</tr>
<tr>
<td>MM650</td>
<td></td>
<td>Gillian Allison</td>
<td>Ms</td>
<td>Allison</td>
<td>1496</td>
<td>MAIN 132</td>
<td>I accept the proposals of the draft Local Plan and emphasise my rejection of development on Alvescot Downs known as &quot;Carterton West&quot;.</td>
</tr>
<tr>
<td>MM651</td>
<td></td>
<td>Helen Dunmall</td>
<td>Ms</td>
<td>Dunmall</td>
<td>1498</td>
<td>MAIN 132</td>
<td>I would like submit my comments in support of the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’. As a resident of Broughton Poggs we already have traffic issues on the B4477 and development of Carterton West would</td>
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<tr>
<td>MM652</td>
<td></td>
<td>Helen Holden</td>
<td>Ms</td>
<td>Holden</td>
<td>1503</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>only exacerbate them.</td>
</tr>
<tr>
<td>MM653</td>
<td></td>
<td>John Dudley</td>
<td>Mr</td>
<td>Dudley</td>
<td>1505</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>We support the Local Plan as now submitted to the Inspector and, in particular, we support its rejection of development on Alvescot Downs known as ‘Carterton West’ and also on the area known as North Carterton in Brize Norton.</td>
</tr>
<tr>
<td>MM654</td>
<td></td>
<td>Hugo Harris</td>
<td>Mr</td>
<td>Harris</td>
<td>1506</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
</tr>
<tr>
<td>MM655</td>
<td></td>
<td>Ian Burton</td>
<td>Mr</td>
<td>Burton</td>
<td>1507</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the WODC Local Plan to 2031 as currently drafted. I support the plan proposing housing development in areas other than Alvescot Downs (Carterton West) – which I don’t see as suitable for reasons cited by CPRE in their assessment...<a href="http://www.cpreoxon.org.uk/news/item/2365-houses-at-alvescot-downs...primarily">http://www.cpreoxon.org.uk/news/item/2365-houses-at-alvescot-downs...primarily</a> that it is divorced from other settlements and it is a conservation target area.</td>
</tr>
<tr>
<td>MM656</td>
<td></td>
<td>Ian Lazarus</td>
<td>Mr</td>
<td>Lazarus</td>
<td>1508</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>As a resident of Shilton, I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘North Carterton’ in Brize Norton. If permission is granted, an area of great beauty will be ruined forever.</td>
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<tr>
<td>MM657</td>
<td></td>
<td>Jane Hewlett</td>
<td>Ms</td>
<td>Hewlett</td>
<td>1511</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>I understand that some have interest in changing the Local Plan. I support the Local Plan as now submitted to the inspector, and in particular I support it’s rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘Carterton North’. I very much hope that our views are taken into consideration.</td>
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<tr>
<td>MM658</td>
<td></td>
<td>Jane Martin</td>
<td>Ms Martin</td>
<td>1514</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as submitted to the inspector, and in particular its rejection of the 'Carterton West' proposal at Alvescot Downs.</td>
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<tr>
<td>MM659</td>
<td></td>
<td>Jayne Robertson</td>
<td>Ms Robertson</td>
<td>1515</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>We would like to register our views on the Local Plan that is currently up for consultation: We support the Local Plan as now submitted to the inspector, and in particular we support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.</td>
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<tr>
<td>MM660</td>
<td></td>
<td>Jenny Lowe</td>
<td>mrs lowe</td>
<td>1517</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I am in support of the new Local Plan as now submitted to the Inspector. In particular, I support its rejection of the development of Alvescot Downs known as the Carterton West option.</td>
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<tr>
<td>MM661</td>
<td></td>
<td>Jeremy Irwin- Singer</td>
<td>Mr Irwin-Singer</td>
<td>1518</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I have seen and read the plan. I support the Local Plan in the form now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West' because the current infrastructure of schools and shops and in particular roads simply cannot support any such development. This is also the view of Filkins and Broughton Poggs parish Council and many residents who have spoken to me about it.</td>
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<tr>
<td>MM662</td>
<td></td>
<td>John Harwood- Stevenson</td>
<td>Mr Harwood- Stevenson</td>
<td>1520</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>We strongly support the Local Plan now submitted to the Inspector and with particular emphasis we support its rejection of development on Alvescot Downs, known as Carterton West.</td>
<td></td>
</tr>
<tr>
<td>MM663</td>
<td></td>
<td>J Bamford</td>
<td>Mr Bamford</td>
<td>1521</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton</td>
<td>We support the LOCAL PLAN as now submitted to the Inspection and in particular we support its REJECTION of development on Alvescot Downs known as Carterton West.</td>
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<td>Respondent ID</td>
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<tr>
<td>MM664</td>
<td></td>
<td>John Cleworth</td>
<td>Mr</td>
<td>Cleworth</td>
<td>1523</td>
<td>Sub Area &gt; MAIN 132</td>
<td>I am writing in support of the Local Plan that has been submitted to the inspector which rejects the development of Alvescot Downs and Brize Norton which have been misnamed &quot;West Carterton” and “North Carterton” respectively.</td>
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<tr>
<td>MM665</td>
<td></td>
<td>John Heilbron</td>
<td>Professor</td>
<td>Heilbron</td>
<td>1525</td>
<td>Sub Area &gt; MAIN 132</td>
<td>This is to express our approval of the current WODC Local Plan, which correctly and emphatically rejects development on Alvescot Downs (the so called Carterton West Project) and large-scale building at “Carterton North” in Brize Norton. These developments would ruin the habitat of the animals (including the people!) that live in the parishes of Alvescot, Brize Norton, and Shilton. They would also place an intolerable strain on an infrastructure that is already insufficient.</td>
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<tr>
<td>MM666</td>
<td></td>
<td>Jon Holloway</td>
<td>Mr</td>
<td>Holloway</td>
<td>1526</td>
<td>Sub Area &gt; MAIN 132</td>
<td>I support the local plan as now submitted to the inspector and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.</td>
</tr>
<tr>
<td>MM667</td>
<td></td>
<td>Julian Chambers</td>
<td>Mr</td>
<td>Chambers</td>
<td>1527</td>
<td>Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as 'North Carterton' in Brize Norton.</td>
</tr>
<tr>
<td>MM668</td>
<td></td>
<td>Juliet Heslewood</td>
<td>Ms</td>
<td>Heslewood</td>
<td>1528</td>
<td>Sub Area &gt; MAIN 132</td>
<td>I should like to state that I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
</tr>
<tr>
<td>MM669</td>
<td></td>
<td>Justin Heyworth</td>
<td>Mr</td>
<td>Heyworth</td>
<td>1530</td>
<td>Sub Area &gt; MAIN 132</td>
<td>I, Justin Heyworth, support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘North Carterton’ in Brize Norton.</td>
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<tr>
<td>MM670</td>
<td></td>
<td>Karen Jobling</td>
<td>Ms</td>
<td>Jobling</td>
<td>1531</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the local plan and do not want development in alvescot downs.</td>
</tr>
<tr>
<td>MM671</td>
<td></td>
<td>Kirsten Damgaard</td>
<td>Ms</td>
<td>Damgaard</td>
<td>1532</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the local plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as “Carterton West” and on the area known as “North Carterton” in Brize Norton.</td>
</tr>
<tr>
<td>MM672</td>
<td></td>
<td>Lorraine Chitty</td>
<td>Mrs</td>
<td>Chitty</td>
<td>1534</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
</tr>
<tr>
<td>MM673</td>
<td></td>
<td>Louise Cameron</td>
<td>Ms</td>
<td>Cameron</td>
<td>1535</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
</tr>
</tbody>
</table>
| MM674        |                         | Lucille Jones   | Ms               | Jones             | 1536       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 132 | With reference to the West Oxfordshire Local Plan we would like you to note our comments as follows: We are fully supportive of the Local Plan that has now been submitted to the Inspector and we definitely support the rejection in the Plan of the Alvescot Downs development, known as “Carterton West”.
<p>| MM675        |                         | Mark Harris     | Mr               | Harris            | 1537       | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132 | Following a review of the current information on the Local Plan for West Oxfordshire we wish to add our support to the Plan in its current state as being submitted to the inspector. In particular we are in FULL support of its rejection of development on Alvescot Downs known as ‘Carterton West’. |</p>
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<tr>
<th>Respondent ID</th>
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<th>Respondent Title</th>
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<tr>
<td>MM676</td>
<td></td>
<td>Mark Templeman</td>
<td>Mr</td>
<td>Templeman</td>
<td>1538</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I fully support the West Oxfordshire Local Plan as now submitted to the inspector. As resident of Langford, I strongly support the Plan's rejection of the development on Alvescot Downs known as &quot;Carterton West&quot; and on the area known as &quot;North Carterton&quot; in Brize Norton.</td>
</tr>
<tr>
<td>MM677</td>
<td></td>
<td>Martin Coldicott</td>
<td>Mr</td>
<td>Coldicott</td>
<td>1539</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.&quot;</td>
</tr>
<tr>
<td>MM678</td>
<td></td>
<td>Melanie Honor</td>
<td>Ms</td>
<td>Honor</td>
<td>1540</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>With respect to the Local Plan for Shilton Parish, we support the Local Plan as now submitted to the inspector, and in particular we support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.</td>
</tr>
<tr>
<td>MM679</td>
<td></td>
<td>Michael Leggo</td>
<td>Mr</td>
<td>Leggo</td>
<td>1541</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>During this final consultation process, we wish to register our total support for the Local Plan as now submitted to the Inspector. We wholeheartedly support the Plan's rejection of the development on Alvescot Downs known as &quot;Carterton West&quot;.</td>
</tr>
<tr>
<td>MM680</td>
<td></td>
<td>Parvin L-Martin</td>
<td>P</td>
<td>Lackschewitz-Martin</td>
<td>1542</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the rejection of development on Alvescot Downs known as &quot;Carterton West&quot;.</td>
</tr>
<tr>
<td>MM681</td>
<td></td>
<td>M Tudor</td>
<td>Mrs</td>
<td>Tudor</td>
<td>1543</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt;</td>
<td>I am pleased to see that development on the Alvescot Downs area, known as &quot;Carterton West&quot; has been rejected on the Local Plan, as submitted to the Inspector. This is a great result and will, hopefully, conserve this beautiful open area of West Oxfordshire from the destruction by development, for future generations.</td>
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<tr>
<td>MM682</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I wish to register my support for the Local Plan as now submitted to the inspector, and in particular, reiterate my support to the 'Plans' rejection of any development on Alvescot Downs, known as 'Carterton West'.</td>
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<tr>
<td>MM683</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the rejection of development on Alvescot Downs known as 'Carterton West', and accordingly support the Local Plan now to be submitted to the Inspector.</td>
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<tr>
<td>MM684</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I would like to express my support for the Local Plan as it has been submitted to the inspector. In particular, I support the plan's rejection of development on Alvescot Downs known as Carterton West.</td>
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<tr>
<td>MM685</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the local plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as Carterton West and on the area known as Carterton North in Brize Norton.</td>
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<tr>
<td>MM686</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan, in so far as the Plan rejects the development on Alvescot Downs known as 'Carterton West'.</td>
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<tr>
<td>MM687</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West'.</td>
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<tr>
<td>MM688</td>
<td></td>
<td>Paula Talford</td>
<td>Ms</td>
<td>Talford</td>
<td>1550</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘North Carterton’ in Brize Norton.</td>
</tr>
<tr>
<td>MM689</td>
<td></td>
<td>Jenny Huggett</td>
<td>Ms</td>
<td>Huggett</td>
<td>1551</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>We totally reject the plans for the above development to Alvescot Road in West Carterton.</td>
</tr>
<tr>
<td>MM690</td>
<td></td>
<td>Peter Grantham</td>
<td>Mr</td>
<td>Grantham</td>
<td>1552</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’. Keep undeveloped Oxfordshire that way.</td>
</tr>
<tr>
<td>MM691</td>
<td></td>
<td>Peter King</td>
<td>Mr</td>
<td>King</td>
<td>1553</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I most strongly support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
</tr>
<tr>
<td>MM692</td>
<td></td>
<td>Rachel Range</td>
<td>Ms</td>
<td>Range</td>
<td>1554</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I have read the local plan with interest and would wish to comment as follows: I support the Local Plan as now submitted to the inspector, and in particular, living in Langford, I support its rejection of development on Alvescot Downs known as “Carterton West”. Any development in this area would flooding and extra traffic to our villages.</td>
</tr>
<tr>
<td>MM693</td>
<td></td>
<td>Rachael Vetch</td>
<td>Ms</td>
<td>Vetch</td>
<td>1555</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I do support the local Plan as now submitted to the inspector and in PARTICULAR I SUPPORT ITS REJECTION OF THE DEVELOPMENT ON ALVERSCOT DOWN i.e. WEST CARTERTON.</td>
</tr>
<tr>
<td>Respondent ID</td>
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<tr>
<td>MM694</td>
<td></td>
<td>Randal Montgomery</td>
<td>Mr</td>
<td>Montgomery</td>
<td>1556</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>We have read the proposal for the Local Plan as it has been submitted to the inspector and wish to make the following comment. We would like to express our support for the plan and in particular the rejection of development on Alvescot Downs or 'Carterton West'. Also we support rejection of development on the area known as ‘North Carterton’ in Brize Norton.</td>
</tr>
<tr>
<td>MM695</td>
<td></td>
<td>tarki</td>
<td>Mr</td>
<td>Dallmeyer</td>
<td>1557</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the plan as it is and there must not be any amendments. Alvescot Downs (Carterton West) must not now be included as a possibility as it has been rejected before in no uncertain terms. The potential developers have previously been told that there is no chance of obtaining planning permission for this site and that must remain the case - it would be total sacrilege if Alvescot Downs was ruined.</td>
</tr>
<tr>
<td>MM696</td>
<td></td>
<td>Richard Parsons</td>
<td>Mr</td>
<td>Parsons</td>
<td>1558</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the local plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as Carterton West and on the area known as Carterton North in Brize Norton.</td>
</tr>
<tr>
<td>MM697</td>
<td></td>
<td>Robert</td>
<td>Mr</td>
<td>DAFT</td>
<td>1559</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>Over the last number of years I have listened to many of the arguments for and against the Local Plan. The Plan as now submitted to the inspector I fully support and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’. Continual change blights the stability of communities and leaves many people uncertain and unprepared to invest in their homes, to add value but more importantly to support our local tradesmen, which in turn promotes the prosperity of the wider community.</td>
</tr>
<tr>
<td>MM698</td>
<td></td>
<td>Roger Chitty</td>
<td>Mr</td>
<td>Chitty</td>
<td>1560</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I would like to comment that I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
</tr>
<tr>
<td>MM699</td>
<td></td>
<td>R. W. Dartnell</td>
<td>R W</td>
<td>Dartnell</td>
<td>1561</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’ and on the area known as ‘North Carterton’ in Brize Norton.</td>
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<td>MM700</td>
<td></td>
<td>Ronnie Scard</td>
<td></td>
<td>Scard</td>
<td>1562</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.</td>
</tr>
<tr>
<td>MM701</td>
<td></td>
<td>Rosemary Spence</td>
<td>Mrs</td>
<td>Spence</td>
<td>1563</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>Living in a rural area we support the existing local plan as submitted to the Inspector and reject a development on Alverscot Downs known as Carterton West and the area known as North Carterton in Brize Norton. These proposed developments are far too big for an area already experiencing traffic, road and drainage problems.</td>
</tr>
<tr>
<td>MM702</td>
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<td>Rupert Back</td>
<td>Mr</td>
<td>Back</td>
<td>1564</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>As a local resident and house holder of Shilton village I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.</td>
</tr>
<tr>
<td>MM703</td>
<td></td>
<td>Ruth Gibson</td>
<td>Ms</td>
<td>Gibson</td>
<td>1565</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West'.</td>
</tr>
<tr>
<td>MM704</td>
<td></td>
<td>Sally Cooper</td>
<td>Ms</td>
<td>Cooper</td>
<td>1567</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I live in Stonelands and I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.</td>
</tr>
<tr>
<td>MM705</td>
<td></td>
<td>Sally Peach</td>
<td>Ms</td>
<td>Peach</td>
<td>1569</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West'.</td>
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<tr>
<td>MM706</td>
<td></td>
<td>Sebastian Snow</td>
<td>Mr</td>
<td>Snow</td>
<td>1570</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I am a local business owner and house owner and we strongly oppose the development of land known as Cartton West and support the local Plan and its reasons for there objection of all commercial and residential activity on this land!</td>
</tr>
<tr>
<td>MM707</td>
<td></td>
<td>Steph Bennett</td>
<td>Ms</td>
<td>Bennett</td>
<td>1572</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West'.</td>
</tr>
<tr>
<td>MM708</td>
<td></td>
<td>Sue Hitchcock</td>
<td>Ms</td>
<td>Hitchcock</td>
<td>1574</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West'.</td>
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<tr>
<td>MM709</td>
<td></td>
<td>Susan Herbert</td>
<td>Ms</td>
<td>Herbert</td>
<td>1575</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I find favour with the Local Plan which has been submitted, in particular that the development of Carterton West is not included.</td>
</tr>
<tr>
<td>MM710</td>
<td></td>
<td>T Farley</td>
<td>Please add</td>
<td>Farley</td>
<td>1576</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I would like to record my support for the Local Plan as now submitted to the inspector. I wish to emphasise my support for the rejection of development on Alvescot Downs- known as 'Carterton West'- a development that I have commented upon previously as undesirable for a variety of sound planning objections all which have been previously noted. I hope this Local Plan for West Oxfordshire can finally be agreed.</td>
</tr>
<tr>
<td>MM711</td>
<td></td>
<td>Tim Gardner</td>
<td>Mr</td>
<td>Gardner</td>
<td>1577</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt;</td>
<td>I support the Local Plan as now submitted to the inspector. I support the council’s rejection of development on Alvescot Downs known as ‘Carterton West,’ despite lobbying by developers, in order to prioritise development closer to the availability of jobs and public transport facilities at other sites.</td>
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<tr>
<td>MM712</td>
<td></td>
<td>Veronica Barry</td>
<td>Ms</td>
<td>Barry</td>
<td>1580</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>Having seen the latest proposals for the Local Plan for the area including Carterton I would like to add my comment to support the plan in its current form. I would again give emphasis on the need for sustainable development and the need to protect Shilton village from potential development in Alvescot Downs and Carterton north, which would have a negative impact on roads, local character of the area.</td>
</tr>
<tr>
<td>MM713</td>
<td></td>
<td>tazio</td>
<td>Mr.</td>
<td>Bridges</td>
<td>1612</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as submitted, i.e. including the rejection of the putative plans submitted for Carterton West and North Carterton.</td>
</tr>
<tr>
<td>MM730</td>
<td></td>
<td>A Hatami</td>
<td>Mrs</td>
<td>Hatami</td>
<td>1680</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the rejection of development on Alvescot Downs known as &quot;Carterton West&quot;.</td>
</tr>
<tr>
<td>MM731</td>
<td></td>
<td>D Lackschewitz-Martin</td>
<td>Mr</td>
<td>Lackschewitz-Martin</td>
<td>1683</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the rejection of development on Alvescot Downs known as &quot;Carterton West&quot;.</td>
</tr>
<tr>
<td>MM732</td>
<td></td>
<td>R Lackschewitz-Martin</td>
<td>Miss</td>
<td>Lackschewitz-Martin</td>
<td>1686</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the rejection of development on Alvescot Downs known as &quot;Carterton West&quot;.</td>
</tr>
<tr>
<td>MM757</td>
<td>Kemp &amp; Kemp</td>
<td>Mr Sensecall</td>
<td>Steven Sensecall</td>
<td></td>
<td>1922</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt;</td>
<td>Our clients note that the Examination Inspector stated at paragraph 4.2 in his Preliminary Findings - Part 2 that the &quot;3 value zones&quot; approach to affordable housing provision adopted by the Council &quot;was justified&quot; at the time that he published his findings. However, he did state at paragraph 4.1 that it was likely that the viability evidence would need to be updated before the Examination is re-opened and at paragraph 4.2 that &quot;the boundaries between the 3 zones could have been drawn differently.&quot; Our clients would endorse these comments and in the absence of any updated evidence from the Council, the company reserves its position regarding the soundness or otherwise of the &quot;3 value zones&quot; approach and the soundness or otherwise of the</td>
</tr>
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Our clients note that Policy H3 proposes a 50% rate in the "high value zone", which includes Eynsham. This is higher than the percentage figure suggested for West Oxfordshire in the county-wide SHMA. That figure was 40%. It is also higher than the percentages adopted by neighbouring districts: in Cherwell the percentage in the adopted Local Plan is 30% or 35% depending on location; and in the Vale it is 35% across the district. In the absence of any updated evidence from the Council to justify 50% affordable housing provision in the "high value zone", our clients reserve their position regarding the soundness or otherwise of the Council's approach and would wish to take part in any hearing session at which this matter is discussed.

The previous points notwithstanding, our clients welcome the acknowledgment in Policy H3 that the level of affordable housing to be provided on qualifying sites will be subject to viability testing. This is essential in dealing with large strategic sites such as the West of Eynsham SDA where there is a significant amount of infrastructure to provide. In this regard, our clients note also that at paragraph 4.2 in his Part 2 Preliminary Findings the Examination Inspector made the point at his paragraph 4.2 that:

"Later hearings will need to assess whether the combination of affordable housing and infrastructure requirements and the proposed CIL charge are justified for particular locations."

Given our representations made in respect of:
1. The inadequacy of the overall housing requirement - which should be 688dpa (560 more homes in the plan period);
2. The unrealistic prospect that Eynsham Garden Village will deliver entirely within the plan period at a rate of 220dpa; with a consequential shortfall of around 760 homes;
3. That a number of allocations should be either reduced in size or deleted;
4. That the plan fails to account fully for the post July 2011 increase in jobs at RAF Brize Norton;
5. That allocations at two of the Carterton sites in the draft plan are not deliverable;
6. That further growth at Carterton would fully reflect the spatial strategy which seeks to focus on main service centres and would be the catalyst for infrastructure delivery and economic growth; and
7. That north Carterton growth would be consistent with the Carterton Master Plan.

It is considered that the alternative sites north of Carterton should be included within the draft Plan to ensure delivery of new homes in a sustainable location, which support the regeneration of Carterton and reflect its expanding economic role and to address the shortfall of housing in the plan due to the
Accordingly, we invite the Inspector to consider allocation of two alternative sites at Carterton. Land North of Swinbrook Park (250 homes currently under construction) is promoted by David Wilson Homes (see Appendix 1: master plan) and would provide 115 new homes immediately adjacent to an existing residential development the proposal also includes a large extension to the Kilkenny Country Park for recreation use for the wider locality. This would define the settlement limits and also provide a suitable buffer of greenspace to Shilton village as well as providing opportunities for cycle and pedestrian access between Shilton and Carterton. The site presents opportunities to enhance additional opportunities to walk and cycle to and from Carterton town centre.

The accompanying Landscape and Visual Appraisal prepared by Barton Willmore (Appendix 3) concludes that there is therefore the opportunity to successfully accommodate residential development on Land North of Swinbrook Park, immediately adjoining the existing consented residential development, currently under construction, on the northern edge of Carterton, and set to the south of a substantial swath of proposed Country Park, forming an extension to the existing Kilkenny Lane Country Park.

Kilkenny Farm land (see Appendix 2: master plan 2012) as previously outlined provides a sustainable option to West Oxfordshire for land within Carterton for 300 homes in the short term and up to 750 homes plus Sha of employment land for small and medium sized businesses. Importantly, both the 300 homes first phase at Kilkenny Farm and the 115 homes at Swinbrook Park could be delivered within the first five years of the plan period. The Sustainability Appraisal states that:

"Land to the north (Kilkenny Farm) is poorly related to the town and poorly served by public transport; a significant incursion into the open countryside; and sensitive landscape, particularly for the northern parts. It was acknowledged that a reduced development in the south-east area could potentially address landscape concerns."

We have outlined above how this opinion cannot be relied upon. We are clear, solely from a landscape point of view, that Kilkenny Farm can accommodate 500 to 750 units (Kirkham, page 7) with “good opportunities to create a substantive landscape structure... maintaining the identity of the settlements of and around Carterton” (Kirkham, page 36). When other factors are taken into account, such as noise, light pollution, air quality, contamination and flooding it is clear that Kilkenny Farm performs better than Carterton East (700 homes with a resolution to grant planning permission). There are fewer risk areas, and Kilkenny Farm offers a higher quality, more sustainable ‘New Rural’ residential environment. Given this context, we are concerned that the SA fails to adequately consider the reasonable alternatives.

Bloombridge’s representations on the SA (8 May 2015) are relevant here. The table below illustrates our concerns by attributing a score of '2' to a '++', '1' for '+' and, for example, '-2' for '- -'. The difference is just 1 point between East Carterton (a total of +5) and North Carterton, Kilkenny Farm (a total of +4), and this is solely attributable to the difference in scores on flood risk. Yet on this objective, East Carterton is recorded as being adjacent to an area of medium and high flood risk (Flood Zones 2 and 3), whilst Kilkenny Farm is Flood Zone 1 (low risk). This score therefore has to be an aberration or, put another way, it is clear that Kilkenny Farm is as sustainable and as acceptable as...
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| East Carterton. In the context of the AONB settlements and growth at the 'Superbase', the findings of the SA ought to have highlighted a clear and uncontroversial way forward for WODC.

As a matter of common sense, a 'Garden Village' at Kilkenny Farm (first proposed in 2012) presents a completely deliverable housing site, with an option of 300 units initially, and a further 450 units either together or as the need arises. This is consistent with the Carterton Town Master Plan and is a logical addition to the 115 units at Swinbrook Park. The SA does not rule out development at Kilkenny Farm and, at a district-wide level, we would expect our site to score very highly and be at the top of the list of options for accommodating the expected increase in housing numbers.

We are disappointed that WODC did not revisit the SA in light of the representations made by Bloombridge, as illustrated in the table below (ATTACHED)

The (phased) scale of development at Kilkenny Farm would not be disproportionate considering the overall extent of Carterton. A limit of 750 units would also address concerns regarding potential development on the northern parts of Kilkenny Farm, which would extend in to the more open landscape, which as a result is more sensitive in landscape and visual terms.

Consistent with the Carterton Town Councils Masterplan and their Spatial Strategy which seeks development to the north of Carterton, significant employment provision, new facilities, infrastructure and Country Park extension, Kilkenny Farm presents a sustainable opportunity to support the growth and economic prosperity of Carterton. New development at Carterton will support the delivery of infrastructure improvements, such as that in the Council's IDP which states at Paragraph 3.10 that:

"Following an evaluation of different options by Oxfordshire County Council, the B4477 Minster Lovell Road has been identified as a priority for upgrading to A-road standard together with the provision of west facing slip roads at the junction of the B4477 and A40."

The accompanying Landscape and Visual Appraisal prepared by Barton Willmore (Appendix 3) concludes that proposals for Land at Kilkenny Farm include proposed residential development set within a landscape framework located on the southern part of land at Kilkenny Farm, predominantly to the south of the area of woodland at Lodge Plantation. The proposed residential development would be set around the existing built form of Kilkenny Farm, would be to the south of existing residential development along Burford Road, and would be contained to the east by the Burford Road and associated residential development and clusters of farms to the immediate east of Burford Road.

The proposed residential development would also be located on the lower lying land, generally below 110m AOD, and within the area that benefits form greater enclosure provided by the framework of existing vegetation, such that there would be limited landscape and visual effects, and potential green infrastructure, biodiversity and recreational benefits, including in relation to the generally southern aspect.

A broad swathe of open landscape would be retained to the north, providing distance and separation between the proposed residential development and the Cotswolds AONB, the setting of the AONB would be sympathetically addressed. And, as proposed in the Carterton Town Master Plan, the Country Park would be extended all the way to Shilton Road.
There is therefore the opportunity to successfully accommodate residential development on the land at Kilkenny Farm, within the southern part of the area, to the south of Lodge Plantation, on lower lying land and where it is set within the context of existing scattered built form and greater existing framework of vegetation.

The inclusion of the two sites at north Carterton are required to ensure that the plan is positively prepared and consistent with national policy in meeting development needs effectively and supporting economic growth (and regeneration of the town centre) in Carterton.

Alternative Options

MM132 refers to Alternative Options at Carterton, including to the north of the town: this includes our clients’ interests at Swinbrook Park and Kilkenny Farm respectively. Paragraph 9.3.54 acknowledges that these areas are identified as having some future development potential in the Carterton Master Plan:

“... having regard to the overall housing requirement and evidence prepared in support of the Local Plan these sites have not been allocated at this point but will be re-considered as part of any subsequent review of this Local Plan alongside any other reasonable alternatives.”

Given our representations made in respect of:
1. The inadequacy of the overall housing requirement - which should be 688dpa (560 more homes in the plan period);
2. The unrealistic prospect that Eynsham Garden Village will deliver entirely within the plan period at a rate of 220dpa: with a consequential shortfall of around 760 homes;
3. That a number of allocations should be either reduced in size or deleted;
4. That further growth at Carterton would fully reflect the spatial strategy which seeks to focus on main service centres and would be the catalyst for infrastructure delivery and economic growth; and
5. That north Carterton growth would be consistent with the Carterton Master Plan.

It is considered that the alternative sites north of Carterton should be included within the draft Plan to ensure delivery of new homes in a sustainable location, which support the regeneration of Carterton and reflect its expanding economic role and to address the shortfall of housing in the plan due to the points outlined above.

Accordingly, we invite the Inspector to consider allocation of two alternative sites at Carterton. Land North of Swinbrook Park (250 homes currently under construction) is promoted by David Wilson Homes (see Appendix 1: master plan) and would provide 115 new homes immediately adjacent to an existing residential development the proposal also includes a large extension to the Kilkenny Country Park for recreation use for the wider locality. This would define the settlement limits and also provide a suitable buffer of greenspace to Shilton village as well as providing opportunities for cycle and pedestrian access between Shilton and Carterton. The site presents opportunities to enhance additional opportunities to walk and cycle to and from Carterton town centre.
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Kilkenny Farm land (see Appendix 2: master plan 2012) as previously outlined provides a sustainable option to West Oxfordshire for land within Carterton for 300 homes in the short term and up to 750 homes plus Sha of employment land for small and medium sized businesses. Importantly, both the 300 homes first phase at Kilkenny Farm and the 115 homes at Swinbrook Park could be delivered within the first five years of the plan period. The Sustainability Appraisal states that:

“Land to the north (Kilkenny Farm) is poorly related to the town and poorly served by public transport; a significant incursion into the open countryside; and sensitive landscape, particularly for the northern parts. It was acknowledged that a reduced development in the south-east area could potentially address landscape concerns.”

We have outlined above how this opinion cannot be relied upon. We are clear, solely from a landscape point of view, that Kilkenny Farm can accommodate 500 to 750 units (Kirkham, page 7) with “good opportunities to create a substantive landscape structure... maintaining the identity of the settlements of and around Carterton” (Kirkham, page 36). When other factors are taken into account, such as noise, light pollution, air quality, contamination and flooding it is clear that Kilkenny Farm performs better than Carterton East (700 homes with a resolution to grant planning permission). There are fewer risk areas, and Kilkenny Farm offers a higher quality, more sustainable ‘New Rural’ residential environment. Given this context, we are concerned that the SA fails to adequately consider the reasonable alternatives.

Bloombridge’s representations on the SA (8 May 2015) are relevant here. The table below illustrates our concerns by attributing a score of ‘2’ to a ‘++’, ‘1’ for ‘+’ and, for example, ‘-2’ for ‘-’. The difference is just 1 point between East Carterton (a total of +5) and North Carterton, Kilkenny Farm (a total of +4), and this is solely attributable to the difference in scores on flood risk. Yet on this objective, East Carterton is recorded as being adjacent to an area of medium and high flood risk (Flood Zones 2 and 3), whilst Kilkenny Farm is Flood Zone 1 (low risk). This score therefore has to be an aberration or, put another way, it is clear that Kilkenny Farm is as sustainable and as acceptable as East Carterton. In the context of the AONB settlements and growth at the ‘Superbase’, the findings of the SA ought to have highlighted a clear and uncontroversial way forward for WODC.

As a matter of common sense, a ‘Garden Village’ at Kilkenny Farm (first proposed in 2012) presents a completely deliverable housing site, with an option of 300 units initially, and a further 450 units either together or as the need arises. This is consistent with the Carterton Town Master Plan and is a logical addition to the 115 units at Swinbrook Park. The SA does not rule out development at Kilkenny Farm and, at a district-wide level, we would expect our site to score very highly and be at the top of the list of options for accommodating the expected increase in housing numbers.
We are disappointed that WODC did not revisit the SA in light of the representations made by Bloombridge, as illustrated in the table below (ATTACHED).

The (phased) scale of development at Kilkenny Farm would not be disproportionate considering the overall extent of Carterton. A limit of 750 units would also address concerns regarding potential development on the northern parts of Kilkenny Farm, which would extend into the more open landscape, which as a result is more sensitive in landscape and visual terms.

Consistent with the Carterton Town Council’s Masterplan and their Spatial Strategy which seeks development to the north of Carterton, significant employment provision, new facilities, infrastructure and Country Park extension, Kilkenny Farm presents a sustainable opportunity to support the growth and economic prosperity of Carterton. New development at Carterton will support the delivery of infrastructure improvements, such as that in the Council’s IDP which states at Paragraph 3.10 that:

“Following an evaluation of different options by Oxfordshire County Council, the B4477 Minster Lovell Road has been identified as a priority for upgrading to A-road standard together with the provision of west facing slip roads at the junction of the B4477 and A40.”

The accompanying Landscape and Visual Appraisal prepared by Barton Willmore (Appendix 3) concludes that proposals for Land at Kilkenny Farm include proposed residential development set within a landscape framework located on the southern part of land at Kilkenny Farm, predominantly to the south of the area of woodland at Lodge Plantation. The proposed residential development would be set around the existing built form of Kilkenny Farm, would be to the south of existing residential development along Burford Road, and would be contained to the east by the Burford Road and associated residential development and clusters of farms to the immediate east of Burford Road.

The proposed residential development would also be located on the lower lying land, generally below 110m AOD, and within the area that benefits form greater enclosure provided by the framework of existing vegetation, such that there would be limited landscape and visual effects, and potential green infrastructure, biodiversity and recreational benefits, including in relation to the generally southern aspect.

A broad swathe of open landscape would be retained to the north, providing distance and separation between the proposed residential development and the Cotswolds AONB, the setting of the AONB would be sympathetically addressed. And, as proposed in the Carterton Town Master Plan, the Country Park would be extended all the way to Shilton Road.

There is therefore the opportunity to successfully accommodate residential development on the land at Kilkenny Farm, within the southern part of the area, to the south of Lodge Plantation, on lower lying land and where it is set within the context of existing scattered built form and greater existing framework of vegetation.

The inclusion of the two sites at north Carterton are required to ensure that the plan is positively prepared and consistent with national policy in meeting development needs effectively and supporting economic growth (and regeneration of the town centre) in Carterton.
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<tr>
<td>MM790</td>
<td></td>
<td>Michael Schultz</td>
<td>Mr Schultz</td>
<td>2314</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I am writing in support of the Local Plan now submitted to the Inspector, in particular its rejection of the Carterton West and North Carterton developments both of which I strongly oppose.</td>
</tr>
</tbody>
</table>
| MM792        | Alvescot Parish Council  | Alvescot Parish Council | Mrs Hoad | 2326 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 132 | Main 132: paragraph 9.3.54
Reference is made to the "Carterton Masterplan" asserting that three areas outside the town have some further development potential. Alvescot Parish Council is not aware of any evidence that Carterton Town Council has adduced to support this view. The status of the "Masterplan" as a planning document is ambiguous - is it for example part of the evidence base for the Local Development Framework? – and caution should be exercised in quoting it here.

It is almost inevitable that any future review of the Local Plan will entail revisiting some alternative options, but the weight of evidence which has accumulated during the Local Plan process to date - as well as in considering a planning application - must surely militate referring to land to the west of Carterton as a "reasonable" alternative.

We hope that these comments are helpful and that the District Council succeeds in persuading the Inspector of the draft plans' robustness.

If the question of a potential development site in this Parish ("Carteron West") should be re-opened in the course of inspection, the Parish Council would expect to be invited to address the Inspector. |
| MM119        |                          | Sarah Steel     | Mrs Steel       | 292         | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 132 | I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West'. |
| MM121        |                          | Alison Goldingham | Mrs Goldingham | 294        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 132 | I would just like to confirm my support for the Local Plan as submitted to the inspector.

I am also fully in agreement with the rejection of development on Alvescot Downs known as 'Carterton West'. |
| MM131        |                          | A Woodford      | Mr Woodford     | 306         | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | "I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West'.")
I looked carefully at the Local Plan which has been drawn up and support its conclusions, in particular |
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<tr>
<td>MM139</td>
<td>Filkins Parish Council</td>
<td>Charlie Payne</td>
<td>Mr. Payne</td>
<td>315</td>
<td>&gt; CARTERTON Sub Area &gt; MAIN 132 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>rejection of development on Alvescot Downs. The expansion of RAF Brize Norton and the considerable growth of traffic on the B4477 has raised numerous problems in our village, Filkins. Any development on Alvescot Downs will just magnify the problem. The road system is just not good enough to cope with expansion to the west of Carterton.</td>
</tr>
<tr>
<td>MM140</td>
<td></td>
<td>Chris Rawlings</td>
<td>Mr Rawlings</td>
<td>316</td>
<td>&gt; CARTERTON Sub Area &gt; MAIN 132 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.</td>
</tr>
<tr>
<td>MM142</td>
<td></td>
<td>Christopher Borton</td>
<td>Mr Borton</td>
<td>318</td>
<td>&gt; CARTERTON Sub Area &gt; MAIN 132 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as 'Carterton West' and on the area known as 'North Carterton' in Brize Norton.</td>
</tr>
<tr>
<td>MM284</td>
<td>Michael Ceserani</td>
<td>M Ceserani</td>
<td></td>
<td>499</td>
<td>&gt; CARTERTON Sub Area &gt; MAIN 132 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 132</td>
<td>Although I confess to a tendency to oppose all development (which I freely admit is an unreasonable standpoint) I accept that some development is necessary and hope that all housing developments are carefully considered and take into account local residents views. With regard to the West Oxfordshire Plan 2031 I support the existing plan as it stands because it rejects the inappropriate development on Alvescot Downs, referred to in the plan as Carterton West. I would not support a plan which includes the Carterton West development. I believe a sizeable housing development on Alvescot Downs would only be the first step and that further development would certainly follow creating a huge development that would adversely affect the local area in many ways to the detriment of all residents.</td>
</tr>
<tr>
<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs Peach</td>
<td></td>
<td>704</td>
<td>&gt; CARTERTON MASTER PLAN &gt; MAIN 16 Policy O52, MAIN 2B 5.31, MAIN 204 Appendix 3 Policies H1 and H2, MAIN 206 Appendix 3 Policy H4, MAIN 210 Appendix 3 Policies E1 and E2, MAIN 211 Appendix 3 Policy E6, MAIN 213 Appendix 3 Policy T4, MAIN 214 Appendix 3 policy EH3</td>
<td>The above paragraphs and policies clearly define that ‘Neighbourhood Plans’ are part of the delivery mechanism for new homes, affordable housing, land for employment, support of Rural Economy, town...</td>
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Carterton Town Council do not have a Neighbourhood Plan as required for compliance with MAIN 1 1.6.  
MAIN 132 9.3.54 and 9.3.59, MINOR 72 9.3.13, MINOR 81 9.3.59, MINOR 83 9.3.77.  
The above paragraphs refer to the 'Carterton Master Plan' implying that it is an approved legally compliant document.  
The CARTERTON MASTER PLAN is not a Neighbourhood Plan. However, the way it is referred to in the Draft Local Plan, certainly gives that impression. It is an aspirational document only which meets neither the requirement of planning law nor is it based on sound planning data or consultation with WODC and neighbouring Parishes affected by it. Additionally, there are significant differences between it and the draft Local Plan.  
Although the content may be acceptable for reference to aspirations within the boundaries of Carterton, it cannot carry any weight to matters outside of the Carterton town boundaries.  
With this in mind, it should be made clear for the sake of transparency, that the Carterton Master Plan is not an approved document as required by NPPF and Planning Law and does not comply with the requirements of Strategy 9.3.40.

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**SECTION 9 - STRATEGY AT THE LOCAL LEVEL**

**Carterton Sub Area**

**MAIN 132** 9.3.56 The continued rejection of “Carterton West” as a strategic site on the basis of evidence previously presented and extensive community consultation, and despite continued lobbying from developers, is to be welcomed.

**Filkins and Broughton Poggs Parish Council** supports the proposed modifications to the Submission Draft West Oxfordshire District Council Local Plan 2031 and in particular the continued rejection of land west of Carterton on Alvescot Downs as potential housing development beyond the natural town boundary formed by the Shill Brook valley west of Upavon Way, Carterton.

As Chairman of the Kencot Parish Meeting and on behalf of the village we support the Local Plan as now submitted to the inspector, and in particular we support its rejection of development on Alvescot Downs known as ‘Carterton West’.

Langford Parish Council wishes to make clear its strong backing for the Local Plan in its current form. We made detailed comments at the time in objection to the possible major developments on the edge of
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<tr>
<td>MM456</td>
<td>Sport England</td>
<td>Raymond Cole</td>
<td>Mr</td>
<td>Cole</td>
<td>1123</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 133</td>
<td>The text indicates that existing leisure facilities on the site may be replaced. Sport England recommends that the Council ensure that any sports facilities on this site are replaced and that a site for their replacement should be identified through the Local Plan.</td>
</tr>
<tr>
<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
<td>-</td>
<td>Crest Strategic Projects</td>
<td>1478</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 133</td>
<td>7.6 The modification needs to be considered in the context of the whole of the employment sub-section which begins at paragraph 9.3.57. Paragraph 9.3.58 states that there is a need to address the out-commuting ‘issue’ and therefore to increase the supply of business land in Carterton. However, the effect of this in policy terms is to identify four hectares of land currently used for leisure/sports purposes on the corner of Monahan Way/Carterton Road and to ‘allocate’ it for employment use subject to relocating the current use to an equally convenient, suitable and accessible location. No location is identified. No further allocations for employment development are identified despite the objective (9.3.60) to identify at least 10 ha of additional employment land during the Plan period, presumable to fulfill the aspiration to rebalance homes and jobs within the town. The Plan is failing to plan positively to deliver against the claimed ambition to address the imbalance between jobs and homes and is unsound in this regard.</td>
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<tr>
<td>MM757</td>
<td>Kemp &amp; Kemp</td>
<td>Kemp &amp; Kemp Mr Steven Sensecall</td>
<td>Mr</td>
<td>Sensecall</td>
<td>1923</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 133</td>
<td>Our clients note that the Examination Inspector stated at paragraph 4.2 in his Preliminary Findings - Part 2 that the &quot;3 value zones&quot; approach to affordable housing provision adopted by the Council “was justified” at the time that he published his findings. However, he did state at paragraph 4.1 that it was likely that the viability evidence would need to be updated before the Examination is re-opened and at paragraph 4.2 that &quot;the boundaries between the 3 zones could have been drawn differently.&quot; Our clients would endorse these comments and in the absence of any updated evidence from the Council, the company reserves its position regarding the soundness or otherwise of the “3 value zones” approach and the soundness or otherwise of the boundaries between the three zones. Accordingly, our clients would wish to take part in any hearing sessions at which these matters are discussed.</td>
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<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs Peach</td>
<td>702</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 133</td>
<td>9.3.62</td>
<td>Unsound as the relevant partners are not listed.</td>
<td></td>
</tr>
<tr>
<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs Peach</td>
<td>706</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 133</td>
<td>9.3.61</td>
<td>Unsound as BNPC consider this to be a poor use of land that has been put forward without appropriate consultation and does not identify a reasonable alternative that is proposed.</td>
<td></td>
</tr>
<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td>957</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 133</td>
<td>MAIN 133 Para 9.3.61-9.3.62 Allocation for employment East of Monaghan Way (Also Policy E1) Stagecoach supports the identification of this land for employment development. Among other things the site offers an important potential opportunity to provide essential facilities supporting the delivery of local services, including bus services.</td>
<td></td>
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1568</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MIN B3</td>
<td>CPRE supports the town centre improvement in 9.3.77 &amp; 9.3.87 and feels that the commencement of redevelopment of REEMA will be enough to encourage businesses and kick start the town centre regeneration, whilst satellite developments have been proven to be ineffective. Ideally, an initiative like Marriot's Walk, including some parking and housing and aimed at leisure, rather than convenience goods, should be pursued, as that is what has made the difference in Witney.</td>
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<tr>
<td>MM370</td>
<td>Brize Norton Parish Council</td>
<td>Mrs</td>
<td>Peach</td>
<td>714</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MIN 87</td>
<td>9.3.96</td>
<td>Unsound as this does not identify the true location of the new primary school and fire station.</td>
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<tr>
<td>MM445</td>
<td>Thames Valley Police - Simon Dackombe</td>
<td>Mr</td>
<td>Dackombe</td>
<td>1013</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 134</td>
<td></td>
<td>Policy CA3 - The penultimate bullet point, please make reference to emergency services as an infrastructure provider.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Mr</td>
<td>Small</td>
<td>1080</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 134</td>
<td></td>
<td>Historic England welcomes and supports the addition to Policy CA3 of &quot;conservation and enhancement of the historic environment&quot; as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Mr</td>
<td>Small</td>
<td>1081</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 134</td>
<td></td>
<td>Historic England welcomes and supports the addition to Policy CA3 of &quot;conservation and enhancement of the historic environment&quot; as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
</tr>
<tr>
<td>MM613</td>
<td>eMPIRE hOMES ITD</td>
<td>Brendan</td>
<td>Mr</td>
<td>O’Brien</td>
<td>1404</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 134</td>
<td>Empire Homes Limited object to Table 4.1 [Main Modification, MM, 14] Policies H1 (MM24), H2 (MM29 and MM30) and CA3 (MM134) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply.</td>
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Empire Homes Limited object to Table 4.1 [Main Modification, MM, 14] Policies H1 (MM24), H2 (MM29 and MM30) and CA3 (MM134) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.

Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure sufficient housing land supply.

Land at Sunset View, Carterton, is under the control of Empire Homes Limited, is available now and capable of delivering around 41 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

The representations provide information on the Land at Sunset View and should be read in conjunction with
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<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
<td>1481</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 134</td>
<td>Edgars Limited’s representations regarding housing supply which are not repeated here.</td>
</tr>
<tr>
<td>MM737</td>
<td>Will Benbow</td>
<td>Mr Benbow</td>
<td>1727</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 134</td>
<td>There is a need to allocate land for at least ten hectares of employment land and four hectares of replacement playing fields to provide for future employment land requirements in and around Carterton. The text of the proposed modification refers to the need to work in partnership with the Town Council and landowners to identify at least ten hectares of high quality business land over the plan period, adding that this should include the provision of four hectares of land at the corner of Monahan Way and Carterton Road which is allocated for employment uses subject to relocation of the sports pitches. The proposed modifications do not identify any new additional employment land or land for sports pitches in the Carterton area. The absence of any indication where such employment land or sports pitches should be allocated means there is doubt about the deliverability of the proposal set out in the modification.</td>
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| MM752         | Bloombridge                   | Mr Cutler       | 1964       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 134 | Policy CA3 - Carterton Sub-Area Strategy  
|               |                               |                 |            |                          | MM134 sets out the draft policy. We object to the inclusion of sites CA1a and CA1b which should be replaced by Kilkenny Farm (up to 750 homes) and Land North of Swinbrook Park (115 homes). Moreover, with the inclusion of land at North Carterton, Kilkenny Farm, would enable the provision of a further 5 hectares of employment for SMEs to the north of the town which should be added to the policy text. The number of homes should be amended to reflect the changes proposed to Policy H1, to 3,150 homes in the Carterton sub area. Figure 9.10 should be modified to reflect the suite changes outlined above (MM135). |
| MM753         | David Wilson Homes Southern   | c/o Barton Willmore | 1965       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 134 | Policy CA3 - Carterton Sub-Area Strategy  
|               |                               |                 |            |                          | MM134 sets out the draft policy. We object to the inclusion of sites CA1a and CA1b which should be replaced by Kilkenny Farm (up to 750 homes) and Land North of Swinbrook Park (115 homes). Moreover, with the inclusion of land at North Carterton, Kilkenny Farm, would enable the provision of a further 5 hectares of employment for SMEs to the north of the town which should be added to the policy text. The number of homes should be amended to reflect the changes proposed to Policy H1, to 3,150 homes in the Carterton sub area. Figure 9.10 should be modified to reflect the suite changes outlined above (MM135). |
| MM793         | Carterton Town Council        | Mr Spurs        | 2327       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton | Carterton Town Council has had an opportunity to review the comments at Page 201/202, para 9.3.98 Policy CA 3 – Carterton Sub-Area Strategy in the revised Local Plan which is being presented to West Oxfordshire District Council on Wednesday 26th October 2016. Carterton Town Council has the following comments to make. |
As you know, Carterton is the only settlement in West Oxfordshire that is relatively unconstrained from an environmental point of view, particularly to the north where, for example, the District Council’s own landscape studies (Hopwood, 2009 and Kirkham, 2012) identified Kilkenny Farm as a suitable location for up to 750 houses.

The Carterton Town Master Plan (April 2015), an extensive and well thought through proposal by leading consultancy WYG, based on extensive local consultation, supported development to the north of Carterton and provided a joined up strategy for housing and employment growth, with environmental improvements (e.g. an extended Country Park) and a major regeneration initiative in the town centre (funded by new development). The Town Council was astonished that these proposals were not carried forward into the Carterton Sub-Area Chapter of the draft Local Plan last year. Worse, we believe the draft Local Plan substantially underestimated the economic needs and potential of RAF Brize Norton; and the Council believes that West Oxfordshire District Council officers have accepted that they missed out 2,500 jobs from their analysis. These are all highly material points that, even now, are missing from the proposals in the latest revised amended local plan.

Put simply, there is no case for further development in Chipping Norton, Woodstock and Witney ahead of Carterton. Why has the Council’s Master Plan been ignored? Do any of these other settlements have anything comparable? Do any of these settlements have a latent economic asset like RAF Brize Norton? Are any of these settlements in the same need? Are the benefits linked to new development in any other settlement so clear and important? Surely the revised Local Plan is the opportunity to address the pressing needs of Carterton and to set a planned-for future for our town?

The Council wishes to register its very strong objections.

What is needed is a Plan that sets out a positive future for Carterton - now. The Council have had no meaningful engagement with officers since the draft Local Plan failed at last year’s EIP. It appears that officers have expended a lot of effort in an attempt to maintain the status quo in relation to housing numbers. This is not satisfactory. The time could have been used much more productively working with Carterton Town Council to take the Town Master Plan to the next level - beyond being an aspirational document.

Carterton Town Council therefore asks that growth is directed to the land around Carterton. This will not be an unpopular strategy at the district-wide level and, when considered alongside the constraints, needs and benefits, it is likely to be the most sustainable solution for the plan area from an economic, environmental and social point of view. This strategy is supported by developers and land owners.

Clearly the strategy outlined in the amended local plan needs to change. Given we are dealing with a twenty year Local Plan, the Town Council is not prepared to put the future of the town on hold.

Carterton Town Council would be derelict in its duty if it failed to provide constructive comment to the
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<td>MM102</td>
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<td>David Heslam</td>
<td>Mr</td>
<td>Heslam</td>
<td>265</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 134</td>
<td>I support the Local Plan as now submitted to the inspector, and in particular I support its rejection of development on Alvescot Downs known as ‘Carterton West’.</td>
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| MM116         |                         | Paul            | Mr               | Hughes            | 287        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 134 | CARTERTON:  
I am pleased that you have continued to reject development to the west of the town and also to the north of Shilton Park.  
I also admire your optimism that the MoD will be a partner that you can work well with over the period of the plan. The example of Reema North is not a very encouraging one and it is appalling that a site that should now have 200 homes built on it is still empty.  
I am very disappointed and object strongly to any plans to turn the sports pitches on the corner of Monahan Way into employment land. This idea makes no sense to me at all.  
These sports pitches are well used, they have recently refurbished facilities (paid for by WODC), they are easy to get to by car, bus, on foot or by bike and they will link up with the proposed sports pitches in the East Carterton development to create a large multi use sports area. In addition these facilities are also used for service personnel repatriations. Where is there another site in Carterton that meets these same standards? Who will pay for the new facilities? |
| MM370         | Brize Norton Parish Council | Mrs              | Peach            | Peach             | 703        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 134 | Policy CA3  
Unsound as 27% of the new homes are focused in Brize Norton. |
| MM370         | Brize Norton Parish Council | Mrs              | Peach            | Peach             | 707        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Carterton Sub Area > MAIN 134 | Policy CA3  
Unsound as BNPC consider this to be a poor use of land that has been put forward without appropriate consultation and does not identify a reasonable alternative that is proposed. |
Ø Carterton Sub-Area
Overall, we agree with WODC that the focus in Carterton should be to strengthen the core of the town. We agree also with the proposal to absorb the additional housing allocated to Carterton within the existing strategic sites and other sites within the town already identified as suitable for development. We support the strengthening of the sub-areas CTA and most ecologically rich location along the Shill Brook.

Ø General Comments

It is clear that the need for housing for Services families is in decline and that the REEMA housing is no longer fit for purpose. Therefore, we are supportive of the release of REEMA Central for housing and of the intention to increase the density at REEMA North, yielding an additional allocation of a total of 300 more homes across both sites. Therefore, we support clauses 9.3.5, 9.3.6, 9.3.36 & 9.3.50.

However, the REEMA areas in the town cover 146 acres in total. The most recent information from the MOD indicated that 742 Service Family Accommodation (SFA) homes are needed, which at the usual 'JSP' density of 12 per acre, will require 62 acres, leaving 84 acres spare. (The demand has fallen due to increased Single Living Accommodation (SLA) units 'inside the wire' and a move towards Service families owning their own homes. Also, outsourcing operational and support services is strong in the current economic climate.)

North and Central REEMA areas cover approximately 70 acres (22 acres at REEMA North and 48 acres at REEMA Central), so the allocation of 300 houses in addition to the existing 200 is modest, even accounting for some retail or leisure land. As noted in the Draft Local Plan, there is likely to be potential in other REEMA areas in the town and it now appears that past claims of the increasing housing need generated by RAF Brize Norton were completely unfounded. The existing 885 houses (as of 2011) are at an approximate density of 6 homes per acre, as they are not well-planned, so there is significant potential to be unlocked in the land, especially since the houses clearly need replacing.

Therefore, no further expansion of the town should occur until these sites achieve their potential and any future development in Carterton should be focused at REEMA. It is clearly preferable to development on open countryside and we agree with WODC that it will improve the style and image of the town. It is development that would lead to clear betterment and would be well supported by the community.

In line with the need, mostly apartments and small homes should be built there, with a few larger gateway properties for kerb appeal. High density housing should be built closest to the centres of towns or cities. Some housing for the elderly would be beneficial. That means that the density could be relatively high, in line with most town centre developments. At the Buttercross site in Witney, 186 units have been built on 7 acres, so the density of 26.5 has been achieved. Buttercross is a good looking development and does not feel overcrowded.

It is a mixed use site with some housing for the elderly. That means that there are 1 bed and 2 bed units, but this is the sort of housing that is needed for the young too- flats and studios. In any event, the REEMA land should include some housing for the young and elderly and that would push up the density. Normal family estates are usually built at 16 properties per acre. Therefore, it would not be unreasonable to conservatively expect a density of 20 homes per acre to be achieved at REEMA, giving a total potential of 1,680 homes in REEMA North and Central areas alone.

Relative to its size, Carterton is already getting a similar number of houses per capita than
Witney, if not, a little more (2,600 houses for Carterton with 16,000 residents in 2011 as noted in clause 2.4, so 0.162 homes per capita, versus 4,400 houses for Witney with 28,000 residents in 2011, so 0.157 homes per capita), Carterton grew faster than any other sub-area in the last decade and at nearly twice the rate of Witney (Carterton’s population grew by 37.3%, whilst Witney’s population growth was 21.4% and the rest of the District was stagnant as taken from ONS data), with practically no improvements in services and facilities. Witney on the other hand has thrived.

In fact, Carterton town has the least infrastructure and facilities of the three main towns and lags behind in terms of employment opportunities, as noted in the Draft Local Plan clauses 2.26, 9.3.10, 9.3.39 & 9.3.42. There is a pre-existing imbalance between numbers of jobs and homes/ worker, meaning that out-commuting is high. It’s the furthest from Oxford and has no A-Road access and no train station. There is mention in 9.3.15 and 9.3.67 of upgrading the B4477 in Brize Norton to an A-Road at a cost of £3.9M, but clauses 7.48 & policy T2 are vague about the security of funding. It appears that there is no firm commitment or allocated funding. It’s not clear either where the £7.2M for westbound slips onto the A40 will come from at Minster Lovell. Carterton should not therefore be seen as the obvious place to put any houses that other areas do not want, as is being suggested.

If for argument’s sake, Witney North’s allocation was relocated to Carterton, the latter would be allocated 4,000 homes (0.250 new homes per capita), whilst Witney would be allocated 3,000 homes (0.107 new homes per capita). So there would be approx. 2.5 times more growth in Carterton than in Witney. Carterton could not sustain such growth without further major incursion into open countryside in neighbouring parishes (over and above that already caused by Shilton Park, Carterton North and Carterton East in Brize Norton and Shilton Parishes), which we consider would be unacceptable.

We support the existing designation of the Shill Brook as a Conservation Target Area as noted in 9.3.27, 9.3.88 and 9.3.90 and agree with the planned enhancement, so that the natural environment and ecology in this area and adjacent Local Wildlife Sites and the SSSI are protected. In this regard, we support policies OS2 & OS4 which seek to protect important landscape, conserve the natural environment and habitats of biodiversity value.

This is not a new or revised point in the Draft Local Plan, but it does mean that the alternative option to the West of Carterton as noted in 9.3.54-56 is not suitable to replace Witney North for example, as the Shill Brook (the most ecologically sensitive location in the sub-area) would be breached and the natural environment disturbed. The high cost of the infrastructure for this site would limit affordable housing provision. Also, this site is in prominent open countryside, unbounded on all 4 sides. The alternative options to the North are in open countryside too and so as above, REEMA should be the next priority for development in the town.

We believe that the windfall allowance stated in 9.3.48 of 262 for the sub-area in 15 years is modest, especially in view of the REEMA potential and also in the town centre as part of retail redevelopments.

We support the inclusion of the Milestone Road site in 9.3.53a-c as an allocation. It’s a relatively large site in a built up area. However, bearing in mind the past care home permissions, it is preferable that the site should include housing for the elderly if possible, which all forms part of the housing need. The site would be best as mixed use. In that case a development density of 26.5 units per acre has been achieved at similar sites in Witney. The capacity is therefore more like 400 units on 6Ha or 15 acres. Even without care for the elderly, a focus on small units as starter homes would achieve a higher density than that assumed.
With regard to the Swinbrook Road development outlined in 9.3.53d-f, we feel that there should be a road link from REEMA North to the central area between the new David Wilson northern developments, this allocation at Swinbrook Road and Shilton Park, so that there is a better link for the associated residents with the town centre. Currently, access to the northern developments is convoluted and the development main entrances point away from the town towards other settlements, like Witney or Burford, which become more likely shopping destinations. As a result, the developments feel like satellites and this new road would create a central hub between the town to the south and the new north western and north eastern developments of recent years. Also, this road would ensure that access to the Country Park is opened up as a facility to benefit the whole town. There appears to be an appropriate corridor of land running from the corner of REEMA North and along the Shilton Park boundary. Only a short section of road would be needed to improve the relationship between these proposed, new and existing relatively new developments and the town, avoiding the current satellite feel. The road would run from the north western corner of REEMA North and adjacent to Stocks Lane and Boundary Way.

We support the town centre improvement in 9.3.77 & 9.3.87 and feel that the commencement of redevelopment of REEMA will be enough to encourage businesses and kick start the town centre regeneration, whilst satellite developments have been proven to be ineffective. Ideally, an initiative like Marriot’s Walk (in Witney), including some parking and housing and aimed at leisure, rather than convenience goods, should be pursued as that is what made the difference in Witney. It’s possible therefore that some housing could be incorporated in the town centre.

Further Detail on 9.3.54 Carterton West Alternative Site

Carterton West is cited as a potential alternative option in 9.3.54 and therefore might be vulnerable if one of the other allocations is dropped. It is an inappropriate application for the development of over 1,000 houses in open countryside. It has been the subject of a planning application that was refused. Much of the planning application submission was subjective. Where objective comments were made, they were based on flawed technical arguments and data. The detail of key mitigation measures was vague with unreadable illustrations in some cases and contradictions in the text. The essence of the merits of the application appeared to be quantum as opposed to substance. The site is noted as unsuitable on the latest SHLEAA and has repeatedly been considered unsuitable by past inspectors.

With regard to some key technical points, the site is in open landscape. In the application, the developer glossed over significant environmental impacts, yet provided great detail about minor issues, which were claimed as benefits. In reality, benefits were exaggerated and any ‘net benefits’ – i.e. those over and above the requirements associated with building over 1,000 houses – would be minimal. So, benefits would mostly simply be what is needed for developing this site. Some impacts, like pollution from concrete construction in the Shill Brook were not even considered. Many arguments on the extent of impacts in general were subjective and mitigation of harm was weak and predominately no more than normal good practice for construction activity. The traffic impact was acknowledged as significant, though was under-stated, and major issues such as disruption and exacerbating of accident black spots were not considered. The flood mitigation proposal was flawed, but even then, the developer was unable to claim any betterment at application stage. This was a crucial step change, as betterment of the wider flooding situation was used to gather early support for the scheme. The creation of
an ecology park was also used to garner support, but the developer made no commitment to fund it.

Exploring some aspects of the site’s suitability in more detail, it is in open unconstrained countryside and is permanently separated from Carterton by the Shill Brook. It is not close to, or well related to, existing services and facilities. It is between the conservation areas of Alvescot and Shilton (see fig. 8.6) causing light pollution and affecting their setting.

Significant construction would be required in the Shill Brook valley, a Biodiversity Area and the most ecologically sensitive zone in the sub-area. In particular, a bridge will be constructed with significant retaining walls due to the steep slope of the site. ‘Gateway’ houses are proposed in this area and are purely a requirement of the developers as a means of signposting the development. There is also a five acre flood storage pond alongside the Shill Brook, where levels will be lowered. The ecology park area will need to be flattened out too as at present the ground is steep in places and so is not suitable for access. The earthworks would therefore be significant. This will destroy the natural environment and cause pollution downstream at the SSSI. The site is home to a number of protected species, but no significant protection measures are proposed. Instead, the developer relies on a suggested man-made ecology park created in mitigation after significant construction work destroying the natural environment. The developer claims betterment, but the detriment is clear. Such a proposal would only provide betterment on a brown field site, with no existing ecology of merit. The construction activity would also pollute the Shill Brook, as would the traffic fumes in the long term. The ecology park is simply an idea designed to disguise the damage done to a natural, sensitive environment, when clearly the most sustainable course of action is to leave it alone. In any event, the developer made no commitment to fund the ecology park.

Therefore, this site is contrary to policy OS2 and H2, which states that new development adjoining service centres must meet the requirements of OS2. Clauses 8.18 & 8.21 indicate that developing near CTAs can present an opportunity for enhancement, but a development that destroys the natural environment and creates a manmade environment after construction would be against policy 8.22, which states that biodiversity off-setting can only be allowed in exceptional circumstances. The Shill Brook CTA is the only one in the sub-area and the adjacent SSSI and two local wildlife sites make it the most ecologically sensitive zone in the sub-area, as illustrated by figures 8.3 & 8.4. It is clearly therefore not appropriate to breach the Shill Brook. It was acknowledged by the developer that the majority of traffic will travel east to jobs and retail centres in Witney and Oxford, bringing excessive traffic through Carterton. Even taking unrealistically low trip rates based on a survey carried out over Easter, and after suggested significant and disruptive traffic mitigation, existing road junctions are at up to 97% of capacity. Traffic would increase by a factor of 2.3 on Alvescot Road, for example, which would be undesirable for residents. With junctions at capacity, there would be no capacity for future growth, even after the proposed upgrades.

Accident black-spots along Alvescot Road between Carterton and Alvescot have not been considered. This stretch of road has a higher accident rate compared to the worst stretch of the notorious A420. The effect on egress from existing side roads on Upavon Way and Alvescot Road has not been considered.

At peak times the gaps between the traffic are small. Traffic in the villages of Shilton, Alvescot, Kencot, Clanfield and Filkins will increase and none of these villages benefit from good roads.

The number of jobs that would be created via employment land on site is small compared to the number of workers the site will create. As most of the workers will travel to Witney or Oxford, it makes no sense to build
on the west side of the town, where traffic has no choice but to travel via the town. It’s the furthest west location in the County and there is no easy route to a main road. Therefore, it is not a sustainable location.

This site is the only one proposed in the sub-area with a main river running through it (the Shill Brook). There is some development proposed in zone 2/3 flood risk areas, including bridge and road construction and gateway houses. This is contrary to clause 8.50 of the Draft Local Plan. There are significant zone 3 areas downstream of the site and upstream too at Shilton, where backing up of the Shill Brook has caused flooding in the past. The developer based his flood mitigation design on the absence of ground water, even though significant ground water was encountered by a Geotechnical Investigation carried out on 17th January 2014. The Geotechnical Consultant recommended further testing, but instead the model is based on ground conditions and soakage test results taken when the site was dry in November 2013. Despite this, calculations show that the mitigation required to avoid flooding on the site itself is extensive. The mitigation does not provide betterment to surrounding areas, as the reduction in the water level in the Shill Brook is minimal. Even based on spurious seasonal dry ground and the associated falsely high permeability, ten acres of attenuation basins and storage are required on the site and still, there is no improvement to the current situation.

Betterment of the flooding situation in the area was one of the developer’s previous main claims, which attracted significant support for the scheme, as it is a requirement of clause 8.55 of the Draft Local Plan. The initial approach was proven to be flawed and simplistic.

More detailed analysis has shown that betterment cannot be achieved, even though the approach is still flawed and in the developer’s favour. In all likelihood, the flooding will be exacerbated to the surrounding villages that suffered badly in 2007. The extensive flood mitigation proposed is not able to achieve betterment regarding flood risk to surrounding villages and may even exacerbate the situation, so future additional houses (which are clearly on the agenda) would increase the flood risk. Crucially, all water storage on site is temporary and the developer relies wholly on discharging into the Shill Brook, which is classified as a Main River. This is the least preferred method under the National Standards for Sustainable Drainage Systems, which are due to come into force this year. The developer admits that discharge volumes into the Shill Brook will increase and the storage will only slow it down, which will not help if the water has nowhere to go due to bottlenecks downstream. Backing up has caused flooding in Shilton in the past. Surface water drainage from a housing estate into the Shill Brook would affect water quality in the SSSI.

There is a bird strike risk with large expanses of water close to the RAF Brize Norton runway.

The site has no services and will need a sewage treatment works, as the Sewage Treatment Works (STW) at Black Bourton is at full capacity and the plan to pump raw sewage across fields to Black Bourton will be costly. The District needs small 1-2 bed units to meet its needs, encouraging an occupancy rate of 1.8 to meet the SHMA model. This model has been used to derive the five-year housing supply and is based on reducing the overall average occupancy in the District. However, the type of development proposed by this application would deliver a mix of housing with a majority of larger family homes. Indeed, the developer claimed that the total population of 1,000 houses would be 2,370 or 2,420 people, depending on which document is used for reference. This is in line with current occupancy in the District and it will maintain existing rates, rather than achieve the figure of 1.8 used to derive the target in the SHMA. The developer made no firm commitment regarding affordable
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>959</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt; MAIN 134</td>
<td>Housing provision, keeping it 'subject to viability'. The number of homes required as a minimum on this site to make this development viable is high. This is because there are expensive infrastructure works required to deliver the housing, such as junction upgrades in the town and flood mitigation. We note that the developer has an option on fields around the site and has an intention to build more houses later. We are also aware that the developer is contacting other land owners in areas to the west of the site. This may be considered by some as a positive attribute, as it could be a quick fix to meeting the housing target. However, all the traffic and flooding calculations are based on 1,000 houses maximum and even then, the developer has struggled to prove that the site has capacity for even 1,000 houses. To maintain prosperity, it is important to develop the District in a way that does not detract from its character and appeal. Just building any type of house anywhere is not enough to attract people to fill employment positions or attract businesses to create them. Economic growth is as much about the style, feel and buoyancy of a location as it is about the number of houses built. This site would not provide the right number of houses, of the right type, in the right place.</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>988</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt;</td>
<td>Stagecoach supports the broad strategy and the sites identified, Stagecoach does not support this Policy. There is considerable remaining doubt as to the timing and quantum of delivery of housing at Carterton, and on large strategic and non-strategic sites in particular. Considering the town's size, sustainability, and growing employment base, arising both from military and non-military employment, this remains a weakness of the Plan. Further potential clearly exists to deliver land to provide housing on land north west of Carterton, east of the Shilton Road. In the light of a serious 5-years supply deficit in a District where opportunities for sustainable development are clearly very constrained, it is regrettable that this site, which is being actively promoted for development by a major housebuilder with a strong track record of delivery (including on adjoining land) has been omitted from the Plan. The site is evidently suitable and achievable in the short term, and could deliver approximately 130 homes. It benefits from nearby bus services which could be improved, to much better serve this part of the town where public transport has to date been much more limited. By adding to the critical mass of demand in this area, as what amounts to an additional phase of a comprehensive scheme, this would help catalyse and sustain such improvements. Stagecoach has also expressed its view in the past that land west of Carterton offers a potentially sustainable location for growth on a strategic scale, particularly if sites already identified and allocated in the Sub Area are further delayed or do not come forward at all within the first 5-10 years of the Plan. We maintain this view, as we are of the view that among other things, the site can relatively straightforwardly be integrated into the strong local commercial bus network.</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Carterton Sub Area &gt;</td>
<td>Stagecoach notes that the link road delivered between Shilton Road and Elmhurst Way in line with currently-adopted Policy, has been designed that its use to afford bus penetration to a very extensive area north and north-west of the town is limited to only that stretch between Elmhurst way and Swinbrook Road. If bus services are to be provided to this extensive area of existing and proposed housing, it will require the</td>
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<td>MAIN 135</td>
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<td>Implementation of a bus gate on Swinbrook Road, as consented as part of application 13/1752P/FP; and the possible use of measures to restrict on-street parking on certain stretches of Elmhurst Way. It is arguable that the streets identified on the figure as a Link Road, as designed and built, should be identified at all as a link-road on the proposals map, as it cannot provide for anything more than a local access function.</td>
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### SECTION 9 - CHIPPING NORTON SUB-AREA

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| MM786         | Oxfordshire County Council      | Amada Jacobs    | Jacobs             | Mrs Jacobs       | 2252       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MIN 88 | 9.4.11
This has led to an Air Quality Management Area (AQMA) being ... |
| MM157         | Declan Haverty                  | Mr Haverty      | Mrs Haverty        | 344              | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MIN 88 | MIN 88, para 9.4.9:
* active consideration should be given to closing the Banbury Road (A361) council salt depot – its location close to a residential area is not appropriate – and using the site for residential purposes or for suitable office purposes
* It is ironic, and inappropriate, that land zoned for office / light industrial use on part of the former Parker Knoll site is “unavailable insofar as it is not being promoted by the landowner” when (I understand) a planning condition on such use for that land was made in order to allow residential development on the remainder of the site; of course the conditional development should have been required to be provided first, in order to prevent developer(s) reneging for whatever reason on the council’s conditions for approval (see comment above re MAIN 48). |
| MM18          | RW Howard                       | Mr Howard       | Canon Howard       | 38               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MIN 89 | MIN 89 I note the comment there is little capacity for further convenience store So ALDI plus Sansburys and the excellent Co-op seem enough without the M and S proposed in Trinity Road. |
| MM451         | English Heritage                | Mr Small        | Historic England   | 1107             | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MIN 91 | Historic England welcomes and supports the amendment to paragraph 9.4.30 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework. |
| MM157         | Declan Haverty                  | Mr Haverty      |                    | 345              | > SECTION 9 - STRATEGY AT THE LOCAL | MIN 91, para 9.4.30:
* I suggest changing a bullet point to “The availability of adequate free public parking capacity is a key constraint in Chipping Norton” |
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<td>MM18</td>
<td></td>
<td>RW Howard</td>
<td>Canon</td>
<td>Howard</td>
<td>37</td>
<td>LEVEL &gt; Chipping Norton Sub Area &gt; MIN 91</td>
<td>MIN 91 Iagree the high level of affordable housing need. We live opposite Fox Close housing which is invaluable but not sufficient.. but do we need 1400 new homes on Tank Farm? We accept the Inspector’s ruling that 600 was insufficient, but note the mayor’s comments that development on this scale is ‘the rape of Chipping Norton’. There seems to be an argument that around 1000 new homes would attract sufficient S106 money for further infrastructure improvement. Could that be done at Tank Farm while retaining Glyn Pearman’s woodlands? There was a suggestion at the public meeting that the land proposed for a new primary school is only enough for a 2 form entry. Enough land for a 3 form entry is desirable, even if a start is made with something smaller. The state of the drainage from Albion Street and in West street requires urgent attention, and of course on top side.</td>
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<tr>
<td>MM45</td>
<td></td>
<td>Nigel Rose</td>
<td>Mr</td>
<td>Rose</td>
<td>109</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 136</td>
<td>When the Local Plan was originally developed, it made sense to concentrate housing developments in the three market towns. However, it is not appropriate to merely extrapolate the original allocations to take the additional numbers required by the Inspector and the SHMA. In particular, it is not sustainable to allocate an additional 800 homes to the Chipping Norton SDA. The percentage of residents employed locally has been falling steadily over the last decade and is now below 30%. Employment growth in the County is centred on the ‘knowledge spine’ running from Bicester through Oxford to the South. Chipping Norton is too inaccessible to attract significant potential employers, who will want to locate near the clusters along the spine. The main employment locally is for ‘minimum wage’ jobs in retail and caring sectors. New residents looking for professional or technical jobs will be forced to commute by car using the sub-standard A44 towards Oxford or the more dangerous A361 towards Banbury. The bus service to Oxford only runs hourly and has to cope with the severe congestion in the Wolvercote roundabout area. Access to the North Cotswold railway line at Kingham is also difficult - the connecting bus service is now sparse and unreliable following the County Council cuts, not as implied in para. 7.58. The additional 800 homes must be allocated nearer to Oxford with easy access to a railway line, thereby linking easily to the main employment areas in the County. The modified Plan already picks up on this logic, by proposing the Eynsham garden village with good links to Hanborough station (and with the potential to be eventually linked to a re-opened railway line to Witney) and with employment areas nearer to the ‘knowledge spine’ clusters. The Chipping Norton “800” should therefore be reallocated to the Eynsham area or sites even nearer to Oxford, with a start date earlier than the 2021 proposed for the garden village. The Chipping Norton Eastern Link Road proposed as part of the Tank Farm SDA will not achieve the reduction in HGVs through the town centre - the vast majority of HGVs are on the A44 towards Evesham, not on the A361. The link road will be a “road from nowhere to nowhere”. The money on the link would be wasted and reduce the likelihood of achieving a proper Chipping Norton by-pass on the A44. The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.</td>
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The dramatic increase in housing proposed for Tank Farm is excessive and completely out of proportion with the layout of the town especially with the large number of houses that are already being built. The original number of 600 that was proposed was already too large, but to increase this to 1400 is ridiculous as there is no local demand for this number of housing and a large number of homes will be far too excessive for local people and, so called 'affordable housing' is a misnomer as many locals cannot afford these. It also drives up the prices of the existing housing stock.

There has been little provision or thought for employment. Some companies, within Chipping Norton who want to expand and cannot get office space and especially not affordable space to build. This plan has no provision for this so will drive these companies out of town causing more people to travel - mainly by car as many bus routes have been cut.

Many new people moving to this development will be from out of town so will be working in larger surrounding towns - travelling to other towns like Banbury, Witney, Stratford, Oxford or Cheltenham causing increased car usage and traffic problems. Chipping Norton already has a problem with traffic and pollution - this will only make it worse and could actually take trade away from what is a thriving town centre.

The 'sweetener' of a link road would not be effective as most traffic is on the A44 and is not heading to or from Burford - meaning that they would still have to go through the centre of town. I believe that Burford is also considering a weight limit.
development. AONB and Landscape Impact

8.4 Chipping Norton lies on the eastern edge of the Cotswold Area of Outstanding Natural Beauty and the impact of any outward expansion of the town must be considered carefully in terms of the impact upon the setting of the AONB. The Landscape and Visual Review (May 2014) prepared by Kirkham Landscape Planning Ltd represents the most up to date assessment of the impact of outward expansion on Chipping Norton on the AONB. The LVR concluded that a landscape-led approach to the siting, layout, mass and scale of development would be essential to the delivery of a scheme, which could fit comfortably into the landscape. The need to protect the key landscape, visual and settlement characteristics of this area was identified as determining factors in limiting the extension of the development.

8.5 In conclusion, the LVR considered that the housing capacity of the site should be limited to 500 dwellings. Final numbers would be dependent on more detailed assessments, and factors such as housing needs, the requirement for Green Infrastructure and an appropriate built form for each area in keeping with the local character.

8.6 Notwithstanding these findings, the Council has now sought to increase the capacity of Tank Farm both through increased density of development and expansion of the development area to more than double the size of the allocation, compared to that proposed within the submission version of the Local Plan (1,400 dwellings against 600 dwellings). Policy CN1 fails to secure a landscape-led approach to the masterplanning of the site and includes areas for development which the LVR had excluded specifically because of the potential for adverse impacts on the setting of the AONB and landscape character.

8.7 The Council has failed to provide any landscape evidence to support the step change in planned development at the Chipping Norton SDA and therefore the proposed modification is in direct conflict with the evidence base.

Heritage Impact

8.8 Paragraph 9.4.30 of the Local Plan highlights the key issues and challenges facing Chipping Norton which include the conservation and enhancement of the historic environment. Chipping Norton contains a Conservation Area, numerous listed buildings and a scheduled ancient monument. The NPPF, paragraph 132 requires local planning authorities to take account of the impact of proposed development on the significance of a designated heritage asset, affording great weight to the asset’s conservation. Paragraph 137 requires LPAs to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. In this regard, paragraph 141 requires LPAs to make information about the significance of the historic environment gathered as part of plan-making publicly accessible.

8.9 The SA Addendum Report acknowledges that the previous SA identified minor negative effects on the historic environment due to the proximity of development to the Conservation Area. The SA Addendum proposes the inclusion of policy criteria requiring archaeological investigation and a strengthening of Policy CN1. However, such policy provisions are effective only insofar as they control the development of a site that has already been allocated; they are ineffective tools in establishing whether or not it is appropriate to allocate land for development per se. Such decisions should more appropriately be based on an assessment of the historic environment more widely to establish whether the principle of development is acceptable.

8.10 Notwithstanding national policy, the Local Plan modifications have been prepared in absence of any assessment of the historic environment or the impact of development upon identified heritage assets. In the absence of such evidence, the Council cannot be confident that the allocation of land at Tank Farm would not cause harm to the identified heritage assets.

Reasonable Alternatives
8.11 The Sustainability Appraisal (Addendum Report 2016) highlights the limited potential for outward expansion of Chipping Norton due to the extent of the Cotswold AONB which wraps around much of the town. As a result of the policy constraint imposed by the AONB, only land east of Chipping Norton has been tested through the Local Plan since 2010. Following the uplift in housing need, the Council reviewed options available and reaffirmed its conclusion that land east of Chipping Norton remains the only potential direction for strategic growth. An assessment of its potential to accommodate up to 1,400 dwellings has been carried out through the refreshed SA.

8.12 It is accepted that the land east of Chipping Norton represents the only realistic option for the outward expansion of Chipping Norton. However, the Council has failed to consider properly, through a direct comparison of all of the available options at the three towns, all reasonable alternatives for accommodating the uplift in housing numbers to meet West Oxfordshire’s housing needs identified by the SHMA. The Local Plan is underpinned by a spatial strategy which serves to direct a significant proportion of growth to the three main towns. To ensure the spatial strategy is met through the allocation of the most suitable and sustainable options for development it is reasonable to expect that the Council should have undertaken a direct comparative assessment of the strategic development options available at all three towns.

8.13 Under such an approach the land east of Chipping Norton should have been assessed against all other available options at Witney and Carterton with the most sustainable site selected for allocation. However, the comparative exercise is limited by location; only sites within the same town are compared i.e. North Witney is compared to East Witney and West Carterton is compared to North Carterton.

8.14 Paragraph 4.38 of the SA Addendum Report confirms that only one strategic development option has been assessed using the full SA framework and in order to meet the required uplift in housing need, the land to the east of the town remains the only potential direction of strategic growth due to AONB constraints.

8.15 The LPA has failed to undertake a proper and fair assessment of all reasonable alternatives that would be capable of meeting the district wide uplift in housing numbers. The comparative exercise that has been carried out is partial and insufficiently thorough and therefore it must be questionable whether the proposed increase in the scale of the SDA at Chipping Norton represents one of the most sustainable options to accommodate the uplift, alongside East Witney and North Witney.

I would question whether Chipping Norton will need all these new houses. Where would the occupants be employed? If they are to be employed in Oxford the houses should be there. The roads into Oxford are already packed in the morning and evening and cannot cope with any more commuters from Chipping Norton.

Also, the current sewers are overflowing at times in West Street and this needs to be addressed before any more houses are built.

HGVs need to be moved out of Chipping Norton. The current road suggestion will not alleviate that as most lorries are heading in the Moreton in Marsh and Evesham direction.

The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic
STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 136

Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive.

There is also a new proposal for an ‘eastern link road’ which is also covered in changes MAIN 136 to MAIN 144 to the Local Plan.

CPRE wishes to raise objections to these proposed changes on the following grounds.

Air Quality

WYG were appointed by Oxfordshire County Council to prepare a strategic Chipping Norton Transport Options Study (CNTOS).

This study concluded that ‘Given that an existing AQMA is already declared in this location, it might be reasonable to conclude that all development options would be likely to exacerbate air quality management issues’ (paragraph 11.1.6 of the report).

The building of 1,400 homes at Tank Farm was one of these development options.

The report also notes ‘in each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre(paragraph 10.1.2).

The study also attempted to ‘identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End)’ (paragraph 9.1.3).

The report concludes that ‘the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack of likely effectiveness and / or unacceptable knock-on impacts’ (paragraph 10.6.1).

The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.

The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

Road Safety

Road safety issues in the centre of Chipping Norton are very closely connected with
the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close proximity. It has been the site of several fatal accidents in recent years. Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to ‘address the relatively high rate of fatalities and serious injuries on the District’s road network’ (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.

Traffic

The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:

- Other traffic related comments

The way the Transport Options Study was carried out

The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in March and were intended to assess “normal” traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren’t the surveys carried out during these busier times of the week?
In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the town. Why wasn’t the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:

"However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully offset and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town resulting from a combination of redistribution and the increased level of development on the Tank Farm site."

* The report also reports that this option "would be likely to exacerbate air quality management issues" – paragraph 11.1.15.
* The health of residents and people working in the centre of Chipping Norton would be put further at risk – see section CN4 above.
* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1

In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would “operate well in excess of their theoretical capacity” and that the other 3 “would all remain operating within or, worst-case, at capacity for all of the potential development scenarios” – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that "the operational impact of
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- Additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate” – paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.

Other traffic related comments

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31.

The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ – paragraph 11.1.18.

However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘..... there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn’t the Transport Options Study for Chipping Norton conclude that ‘delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031’ (paragraph 11.1.21)?

The Transport Options Study report also concludes that this option “would be likely to exacerbate air quality management issues” – paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:

* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.

* The town has been experiencing severe air quality issues and the associated detrimental effects on people’s health for at least a decade.

* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.
* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.

* All the time traffic through Chipping Norton increases and these problems get worse.

When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton’s traffic related problems. However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town’s residents and visitors to expect a better solution than this?

Car parking

Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: 'The availability of adequate public parking capacity is a key constraint in Chipping Norton' (paragraph 9.4.30) and 'Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate' (paragraph 9.4.60).

The Local Plan states: ‘The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre’ (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping.

A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and especially if doing a large weekly shop.

The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before development is permitted at the ECNSDA the problem of how to provide significant extra car parking capacity in the town centre needs to be resolved and funding secured for this.

School capacity

The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: ‘It is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing
secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation' (paragraph 9.4.48).

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of school age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size. The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people

One of the Core Objectives identified in the Local Plan is: 'CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel' (paragraph 3.7).

Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally.

Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton:

‘Chipping Norton will strengthen its role as a centre of enterprise in the northern part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.’ (paragraph 3.2)

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a relatively short time period must put at risk the special character of the town.

Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that 'the number of people living and working in the town has fallen from 50% to 36% since 2001' (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town
for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes in the ECNSDA it is surely only a matter of time before one of the major supermarkets puts forward plans for a large new store on the outskirts of Chipping Norton.

Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.

There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: ‘Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre’ (paragraph 9.4.61). However there is no explanation of how pressures for ‘out of centre development’ will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA

Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

* - Measures to reduce air pollution
* - Improvements to road safety in Chipping Norton
* - New road
* - Other improvements to roads in and around the town
* - Extra car parking
* - Improving conditions throughout the town and surrounding areas for pedestrians and cyclists, including accessibility to bus and rail services
* - New primary school
* - Significant expansion of secondary school
* - Mitigation measures for the impact on the Conservation Target Area (CTA) and the SSSI

Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask:
where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?

If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be

The proposed level of housing at Tank Farm been increased from 600 – 1,400 dwellings, partly through allocation of land in the ownership of my Client, to the east of the proposed development area.

This expansion is supported and it is confirmed that the land is available, deliverable and developable.

My Client is working with other the other main landowners and promoters to bring forward the development.

The draft Plan could be considered unsound (not positively prepared or effective) if it does not provide enough housing and facilities in the earlier part of the plan.

The SDA will not make a significant contribution to the delivery of housing or community infrastructure, including the link road, until towards the end of the plan period (just 200 homes in the first 5 years). Therefore, there is a need for the other sites in Chipping Norton and the wider sub-area to make a difference early on by providing new homes, improved facilities and contributing to measures to help with traffic and air quality management.

Main 136 – Anticipated Housing Delivery in the Chipping Norton Sub-Area

2.41 Table 9.3 sets out the anticipated housing delivery in the Chipping Norton Sub-Area. The Sub-Area has been set an indicative housing requirement of 2,400 new dwellings to assist in meeting the District wide requirement of 13,200 new dwellings. As is clear from Table 9.2 the Plan as currently drafted, including the proposed new allocations in the Sub-Area would deliver only 2,326 new dwellings in the Sub-Area.

2.42 Clearly therefore not only is the overall Plan failing to make adequate provision for its housing requirement this is also specifically the case within the Chipping Norton Sub-Area. As discussed above in relation to the overall housing land supply, it is important that the Plan not only makes sufficient provision to meet the objectively assessed need for the District but also, as required by the NPPF, allows sufficient flexibility to allow for changing circumstances.

2.43 Whilst additional housing could be provided for through Neighbourhood Plans there is no guarantee of this, and no mechanism in place in the policy should they not deliver. Currently the only Neighbourhood Plan area designated in the Sub-Area is in relation to the made Chipping Norton Neighbourhood Plan, which does not allocate any sites for
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<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>-</td>
<td>Cala Homes (Chiltern)</td>
<td>1731</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 136</td>
<td>2.44 As currently drafted there is therefore concern as to whether the Plan will meet the housing requirement for the Sub-Area and the District as a whole. CALA fully supports the proposed increase in housing within the Chipping Norton sub-area and the increase at the East Chipping Norton SDA.</td>
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<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>-</td>
<td>Cala Homes (Chiltern)</td>
<td>1741</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 136</td>
<td>Table 9.3: Anticipated Delivery to the Chipping Norton Sub-area Main Modification 27 and 136 reflect the increase in dwellings, from 600 – 1,400 dwellings, allocated to the east of Chipping Norton at Tank Farm. CALA supports this level of increase.</td>
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<tr>
<td>MM67</td>
<td>Miss</td>
<td>Kirsty Garrett</td>
<td>Miss</td>
<td>Garrett</td>
<td>178</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 136</td>
<td>Chipping Norton is a town of approximately 2,500 households (2011 census), and so in total the proposed development will roughly double the size of the town. Even without the proposed development at tank farm, the town is due to grow by almost 50%. Whilst it does make some sense to concentrate development in towns, to impose a doubling of the town's population in a short space of time is disproportionate. I submit, therefore, that the proposed development at Tank Farm should be removed from the plan - or significantly reduced to make the total provision of new housing more commensurate with the size of the existing town, and the facilities provided therein. Furthermore, whilst there is a small consideration in the proposal to provide some local employment, it is widely accepted that the majority of the new residents will need to commute to Oxford, or further afield. It should be noted that Chipping Norton is connected by an infrequent and slow bus service to Oxford only. Consequently, the majority of journeys are made by car - on already overly congested roads.</td>
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<tr>
<td>MM746</td>
<td>Hallam Land Management</td>
<td>Hallam Land Management</td>
<td>-</td>
<td>Hallam Land Management</td>
<td>1861</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 136</td>
<td>For reasons set out above in relation to other Proposed Modifications, the allocation of housing growth to the Chipping Norton Sub-Area is insufficient. It fails to have regard to the potential of the smaller settlements to accommodate growth. As is evident from the commentary in paragraph 9.4.6 of the Plan, the other principal settlements of Enstone and Middle Barton have historically been deemed to suitable for housing growth but, particularly in the case of Middle Barton, have not witnessed significant growth since the end of the 1990s. Given the overall growth requirements that must now be accommodated in the district, and the</td>
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consequences in terms of unprecedented housing delivery rates, a delivery-focused strategy must result in a greater distribution of development across the district. Moreover, given the imperative to front-load the clearance of the housing backlog, and to enhance the delivery trajectory during the early years of the plan period, both of which are reflected in the need to improve the five year supply of deliverable housing land, the allocation of smaller, immediately deliverable sites associated with lower order settlements must be included in the strategy.

Objection is therefore raised to the failure to include the omission site comprising land north of Holliers Crescent, Middle Barton within Table 9.3. The inclusion of the site is necessary to contribute to redressing the backlog, achieving and maintaining a five year supply of deliverable housing land, and 'meeting' the OAN during the Plan period. It is also required to maintain a sustainable rural settlement that provides a service centre role for its rural hinterland.

Inclusion of the site would be entirely consistent with the development strategy of the Plan, which is that:

Beyond the rural service centres, some development will be supported in the villages, but this will be limited to that which respects the village character and local distinctiveness and would help maintain the vitality of the local community. A number of site allocations are proposed to ensure the delivery of new housing on suitable, available sites. (para. 4.19)

The omission site is commensurate with the size of the village, will respect the village character and local distinctiveness, and will help to maintain the vitality of the local community. It should therefore be included in the site allocations to ensure the delivery of new housing on suitable, available sites.

We enclose a plan (Appendix 2) showing Sharba Homes interests at Chipping Norton. It currently features in the Strategic Housing Land Availability Assessment (SHLAA) as Site 270. An appeal was dismissed for a proposal to develop the whole parcel of land in 2014, primarily due to its impact on the setting of Bliss Mill. The location within the AONB and Conservation were also of concern, however sensitive developments in such locations have been justified elsewhere in the face of the urgent need for housing, such as Burford Road, Penhurst School, and further afield in Milton-under-Wychwood and Stonesfield. However we now propose a far reduced site area which addresses the core reason for refusal, in that it does not a) impinge on the primary rural setting of the Mill and b) it does not impinge beyond the urban backcloth from the main viewpoint of the Mill. The residual impacts of the development can be mitigated by sensitive design and landscaping as has been achieved in similar locations elsewhere in the District.

Chipping Norton has had its target for housing increased from 400 to 2400 during the numerous
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<td>MM147</td>
<td></td>
<td>David Whetstone</td>
<td>Mr</td>
<td>Whetstone</td>
<td>326</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 136</td>
<td>Iterations of the emerging Plan, and in our view, it is unsustainable to focus most of it on Tank Farm as is currently being proposed, and is currently strongly objected to by the Town Council. We consider it a more appropriate solution to spread delivery amongst a number of smaller sites, such as a part development of site 270, which will assist with the Council’s concerns in respect of both delivery and sustainable dispersal around settlements.</td>
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<td>MM239</td>
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<td>John Dunleavy</td>
<td>Mr</td>
<td>Dunleavy</td>
<td>445</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 136</td>
<td>I am a resident of Chipping Norton and wish to submit comments on the following Main Modifications to the Local Plan: MAIN 136 MAIN 138 MAIN 139 MAIN 140 MAIN 142 MAIN 143 There are two important changes which are described in these sections: the proposal to increase the number of homes in the ECNSDA from 600 to 1,400 and the proposal for a new ‘eastern link road’. My comments are concerned with these two major proposed changes. I am opposed to the increase in the number of homes in the ECNSDA from 600 to 1,400 for a number of reasons including the following: * this change goes against some of the Council’s own Core Objectives as specified in the Local Plan document e.g.: “CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel” (paragraph 3.7). The previous version of the Local Plan proposed 600 homes in the ECNSDA. This was presumably felt to meet local housing needs. 2,400 additional homes in Chipping Norton is a ludicrous notion. It is the consequence of flawed Government analysis which will only compound the issues facing the country: - There are already enough houses in the country. Most of them are no longer affordable to those who need them, and many are located away from London and the South East; - Housing should not be a “commodity” to be traded and used as a means of creating wealth. Building more houses benefits, mostly if not exclusively, house builders. There is no longer any meaningful link between the price of a house and average pay. House prices in London, inflated at the high end by foreign and other “investors” has completely distorted the rest of the “market” in London and knocked on to the rest of the country; - Emphasis should be place on moving away from home ownership and new housing should be rental, public and private. Renting a house should not carry a stigma. Owning a house should not be a means to creating excessive wealth. - The Government has fuelled the dramatic rise in house prices by allowing London and the South East to soak up investment. HS2, Cross Rail, Heathrow expansion are all massive projects that benefit London and serve to further alienate the rest of the country.</td>
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Adding a further 800 homes does not ‘locate new residential development where it will best help to meet local housing needs’.  
* The change from 600 to 1,400 homes is an increase of around 250% but the Local Plan does not specify why such a large increase is necessary.  
* The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan. The Local Plan and the Transport Options Study report admit that even with the eastern link road by 2031 traffic in the town centre will have increased.  
* This will mean that the centre of Chipping Norton (which is already an AQMA) will have higher levels of air pollution with the increased detrimental effects on the health of local people.  
* The centre of Chipping Norton is already an accident blackspot with 19 fatal and serious RTAs on the A44 as it passes through Horse Fair over the last three decades. Extra traffic will increase the likelihood of further worsening of road safety in the town which is contrary to the Council’s commitment to ‘address the relatively high rate of fatalities and serious injuries on the District’s road network’ (paragraph 2.40).  
* There are therefore a number of profound and possibly detrimental implications of the proposal to increase the number of homes in the ECNSDA to 1,400. A significant concern for local people is that the houses will be built without the funding materialising to pay for the mitigation measures. This fear is magnified since but the Local Plan does not contain any costed plan as to how these will be managed.  
* The Local Plan says that even with 1,400 homes at the ECNSDA the town centre will not be adversely affected. If this is the case then it must be envisaged that most people living there will do their main shopping in the town centre shops and/or the Aldi store. This will further increase traffic in the town. Was this factor taken into account in the Transport Options Study?  
* The Local Plan talks about a demand for business space in the town but this demand is not quantified. Space has been allocated for this purpose but there is no indication of how additional jobs will be created in the town. The concern is that if 1,400 homes are built at the ECNSDA then without a significant level of new employment in the town Chipping Norton will become a dormitory town with the vast majority of the residents in these new homes commuting to work adding to pressure on roads and contrary to the Local Plan’s Core Objective CO4.  

In summary I would like to state that I do not believe that the proposal to increase the number of homes at the ECNSDA from 600 to 1,400 is in the best interest of the people of Chipping Norton.

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| MM315         |                         | Richard Gwinn   |                  | Gwinn             | 574       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 136 | his modification increases significantly the number of properties to be built in the Chipping Norton SDA. This is backed up by unsound evidence and is not appropriate to the existing community. In particular:  
  a) Part of the Vision in section 3.2 is to “play a role in helping to meet wider needs, without significant change to the intrinsic character of the District.” Increasing the population of the town by 50% will inevitably change its character. Especially as the driver for the increase is the need to house those working in Oxford, so turning a working town into a dormitory town.  
  b) Core Objective CO2 is to “Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.” This fails for the same reasons as the Vision statement.  
  c) Core Objective CO3 is to “Promote safe, vibrant and prosperous town and village centres and resist proposals that would damage their vitality and viability or adversely affect measures to |
improve those centres.” Whilst a modest increase in population will help the town, this huge increase, aimed at commuters into Oxford, will be detrimental. The plan mentions that the proposed development is within walking and cycling distance of the town centre, although it offers no evidence to support this. I visit the town centre most days and have never seen more than one bicycle in the cycle parking there. The area around the town is too hilly for most of the population to cycle. A straw poll of people living in the Parkers Circus estate (which is closer to the town centre than is the SDA) indicates that none walk when going into town to do their shopping. These were all fit, active people. The town centre is also not safe. In the last few years, people have been killed by passing traffic while on the pavement at Horsefair. The proposed link road appears to be a “road to nowhere” as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this relief road. This increase in traffic will also affect air quality, which is already at illegal levels.

d) Core Objective CO4 is to “Locate new residential development where it will best help to meet local housing needs and reduce the need to travel.” Policy T1 – Sustainable Transport says that “Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.” The increase proposed in the modification is mainly to serve Oxford. There is no train link to Oxford. The bus to Oxford takes over an hour and is infrequent. The bus service from Kingham Station does not wait if a train is delayed, resulting in a possible two-hour wait for the bus that meets the next train. I see no solution to this problem as buses have to keep to timetables. Everyone I know has stopped using this bus, resulting in more car journeys and a station car park that can’t cope. The alternative is to travel to the station by driving through country lanes and the village of Churchill in contravention of Policy T1. The increased local traffic will make air quality worse. There is nothing in the proposed plan to solve these problems.

e) The proposed plan states in para 7.74 that “In Chipping Norton public car parking spaces in the town centre are insufficient to meet current needs.” There is nothing in the proposed plan to solve this problem.

General comments.
Chipping Norton is one of the highest towns in West Oxon and is built mainly on hills with narrow streets except for the main roads of M4 and A36f in places the underground infrastructure (overflowing sewers/rainwater drainage - shared system) is already creaking with too much use and the road problems we have are well documented and accepted as being unfit for purpose by OCCA/VODC with a serious air quality problem in the centre of town. It might also be worth mentioning here that when an OCC employee was recently asked 'how many of West Oxfordshires main A roads are fit for the very large HGV’s we see nowadays? The answer was 'none of them'!

CHIPPING NORTON NEIGHBOURHOOD PLAN - on 3rd March 2016 a referendum was held in the town accepting the CNNP which was then adopted. In this plan it was mentioned in several places that any future development has to be sustainable and it is felt that whilst 600 homes on Tank Farm were possibly sustainable 1400 homes are not - please see notes 213141516 below. It is felt that WODC in their draft Local Plan entirely ignoring the spirit of the CNNP.
In February 2014 the Town accepted that it would have to take some new houses and reluctantly agreed that 600 on the area known as Tank Farm (the south half of the SDA) could be acceptable subject to suitable planning and mix of houses and infrastructure.

Little contact has been made since then except for a plan that was attached to a planning application in the nearby area in the middle of 2015. Nothing officially has been given since the meeting on 14th February 2014 until 23rd August 2016 when in a meeting between CNTC and OCC a plan using 800 homes plus 80 extra care beds was tabled and alterations suggested including no access at the southerly perimeter.

The next contact was the recent suggestion of 1400 houses. Considering that the allotment land to the south of the SDA is owned by the Town it seems strange that discussion about the possible of purchase of any land requirement has not yet happened - for sake of absolute clarity the William Fowler Allotment land is not for sale.

We also get the impression that some pressure might have been brought to bear on local land owners to go along with OCC plans - and please bear in mind that the majority of the land we are discussing is owned by OCC - thank goodness there are some 'ransom sites' to protect the town from being totally overrun and spoilt.

We also feel that discussions with other stakeholders have not taken place - we back this statement up with the recent planning application at the Pillars which is adjacent to the northern edge of the SDA with no vehicular access which apparently shows no coherent masterplan. Chipping Norton Town Council totally reject the new local plan for the SDA for the following reasons in brief:-

1) 1400 new homes on Tank Farm are not sustainable
2) The local employment of residents has fallen over the last 10 years and is now below 30%
3) The majority of local employment tends to be 'low paid' jobs in retail catering and caring sectors
4) 'High paid' jobs i.e. professional or technical jobs tend to be in what is now called the 'knowledge spine' which is difficult to access from Chipping Norton unless you drive as we have a poor train and bus service
5) Narrow and congested roads (including the main A44/A361 at Horsefair where the worst pollution in Oxfordshire has been ignored for many years by OCC and WODC. The best long term solution to Horsefair are the road improvements needed around the Rollright Stones, which have been discarded due to cost - now budgeted at £18 million by OCC's consultants
6) The cost of the Eastern Relief road has not yet been tabled but has to be close to the figures in 5)
7) The traffic figures being used from the survey carried out by WYG are erroneous - two points immediately stand out - a) it is stated that there have been no traffic related accidents in Horsefair in the last 5 years - we know that there have been 3 DEATHS in the period and b) it is stated that the busiest time of the day on Burford Road (A361) at Chipping Norton School (a large comprehensive 1200 pupils) is between 0700 and 0800, but in reality this is really 0815 to 0845.
8) We dispute the figures given to us by OCC and others which show that only 30% of the HGV's that transit through Horsefair use the 4361 towards Burford and a massive 10% use the A44 east and west towards Oxford/Moreton-in-Marsh/Evesham and the 4361 north to Banbury.

We have been advised by independent traffic consultants that the figures are probably nearer to 15% respectively 85%. We therefore consider the Eastern Relief Road to be ill-advised.

9) An independent expert has recently been shown our traffic problem and has walked around the town and agrees with the Town Council that a one way system using Albion Street and the High Street would go a long way to deter HGV’s improve the air quality ease congestion and add few badly needed parking spaces. This could be achieved comparatively quickly and at a much lower cost than building either road.

10) Parking according to WODC’s figures this town is on average at 110% capacity when it comes to public carparks and on-street parking. A second storey on New Street car park would help alleviate the problem but would not completely resolve the problem.

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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus Dr Small</td>
<td>Dr Small 989</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 136</td>
<td>MAIN 136 paras 9.4.32-9.4.33 Chipping Norton Sub-area Strategy</td>
<td>Stagecoach notes and supports the role Chipping Norton is to play in meeting the District's development needs, as one of the most sustainable settlements in the District. As part of this strategy, there is clearly scope for improved bus services to be delivered alongside and serving new development, which will allow public transport credibly to provide a greater role in meeting local travel needs, both for existing residents and those in new developments.</td>
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon Mrs Marshall</td>
<td>Mrs Marshall 1604</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 137</td>
<td>The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive. There is also a new proposal for an ‘eastern link road’ which is also covered in changes MAIN 136 to MAIN 144 to the Local Plan. CPRE wishes to raise objections to these proposed changes on the following grounds. Air Quality WYG were appointed by Oxfordshire County Council to prepare a strategic Chipping Norton Transport Options Study (CNTOS). This study concluded that ’Given that an existing AQMA is already declared in this location, it might be reasonable to conclude that all development options would be likely to exacerbate air quality management issues’ (paragraph 11.1.6 of the report). The building of 1,400 homes at Tank Farm was one of these development options.</td>
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The report also notes ‘in each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre (paragraph 10.1.2). The study also attempted to ‘identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End)’ (paragraph 9.1.3). The report concludes that ‘the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack of likely effectiveness and / or unacceptable knock-on impacts’ (paragraph 10.6.1). The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.

The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

Road Safety

Road safety issues in the centre of Chipping Norton are very closely connected with the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close proximity. It has been the site of several fatal accidents in recent years. Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to ‘address the relatively high rate of fatalities and serious injuries on the District’s road network’ (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.
The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:

· The way the Transport Options Study was carried out
· The findings of the Transport Options Study
· Other traffic related comments

The way the Transport Options Study was carried out

The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in March and were intended to assess “normal” traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren’t the surveys carried out during these busier times of the week?

In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the town. Why wasn’t the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the
proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:
  "However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully offset and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town resulting from a combination of redistribution and the increased level of development on the Tank Farm site."

* The report also reports that this option "would be likely to exacerbate air quality management issues" – paragraph 11.1.15.

* The health of residents and people working in the centre of Chipping Norton would be put further at risk – see section CN4 above.

* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1
In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would "operate well in excess of their theoretical capacity" and that the other 3 "would all remain operating within or, worst-case, at capacity for all of the potential development scenarios" – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that "the operational impact of additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate" – paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.

Other traffic related comments

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31. The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ – paragraph 11.1.18.
However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘..... there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’.

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn't the Transport Options Study for Chipping Norton conclude that ‘delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031’ (paragraph 11.1.21)?

The Transport Options Study report also concludes that this option ‘would be likely to exacerbate air quality management issues’ - paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:

* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.

* The town has been experiencing severe air quality issues and the associated detrimental effects on people’s health for at least a decade.

* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.

* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.

* All the time traffic through Chipping Norton increases and these problems get worse.

When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton’s traffic related problems. However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town’s residents and visitors to expect a better solution than this?
Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: ‘The availability of adequate public parking capacity is a key constraint in Chipping Norton’ (paragraph 9.4.30) and ‘Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate’ (paragraph 9.4.60).

The Local Plan states: ‘The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre’ (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping. A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and especially if doing a large weekly shop.

The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before development is permitted at the ECNSDA the problem of how to provide significant extra car parking capacity in the town centre needs to be resolved and funding secured for this.

School capacity
The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: ‘it is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation’ (paragraph 9.4.48). The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of school age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size.

The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people
One of the Core Objectives identified in the Local Plan is: ‘CO4 Locate new residential
development where it will best help to meet local housing needs and reduce the need to travel’ (paragraph 3.7).
Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally.

Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton: ‘Chipping Norton will strengthen its role as a centre of enterprise in the northern part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.’ (paragraph 3.2)

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a relatively short time period must put at risk the special character of the town.

Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that ‘the number of people living and working in the town has fallen from 50% to 36% since 2001’ (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes in the ECNSDA it is surely only a matter of time before one of the major supermarkets puts forward plans for a large new store on the outskirts of Chipping Norton.

Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.
There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: 'Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre' (paragraph 9.4.6). However there is no explanation of how pressures for 'out of centre development' will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA

Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

* Measures to reduce air pollution
* Improvements to road safety in Chipping Norton
* New road
* Other improvements to roads in and around the town
* Extra car parking
* Improving conditions throughout the town and surrounding areas for pedestrians and cyclists, including accessibility to bus and rail services
* New primary school
* Significant expansion of secondary school
* Mitigation measures for the impact on the Conservation Target Area (CTA) and the SSSI

Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask: where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?

If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be
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<td>MM386</td>
<td>Cotswolds Conservation Board</td>
<td>Ms Rood</td>
<td>834</td>
<td>Norton Sub Area &gt; MAIN 137</td>
<td>MAIN 137. Para 9.4.37 regarding windfall sites</td>
<td>The plan maintains ‘it is reasonable to expect delivery of at least 207 units from unidentified windfall sites in the period 2016 – 2031’. The Board is concerned that the modification for this paragraph makes no reference to avoiding development in the AONB. We recommend the insertion as indicated in italics below. 'It is also considered appropriate to include a 'windfall' allowance to cater for unidentified sites that are likely to come forward for housing over the period of the Local Plan. Larger sites within the AONB should be avoided. If proposed sites should clearly demonstrate 'exceptional circumstances' as per national policy. Based on past evidence of historic rates of windfall delivery by sub-area, it is reasonable to expect delivery of at least 207 units from unidentified windfall sites in the period 2016 – 2031.'</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Dr Small</td>
<td>993</td>
<td>MAIN 137 para 9.4.36 Parker Knoll Site: business use and replacement allocation</td>
<td>Stagecoach notes the deletion of the paragraph. A relatively small part of this site is currently used as an Operating Centre by Stagecoach to support the operation of service S3 (Chipping Norton/Charlbury – Woodstock – Oxford) in particular. This site is subject to active redevelopment proposals that are likely to require Stagecoach to find an alternative, if early morning departures and late evening services are to continue to be offered on the route. A replacement “outstation” site is very likely to be needed. Stagecoach further notes that the enlarged allocation East of Chipping Norton (MAIN 138) makes specific provision for commercial uses on a 9Ha site north of London Road forming part of a proposed enlarged allocation. This site could provide suitable replacement premises to accommodate both existing operational requirements, and their likely expansion in support of the higher levels of demand likely to arise from the planned growth of the town.</td>
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<td>MM45</td>
<td>Nigel Rose</td>
<td>Mr Rose</td>
<td>110</td>
<td>MAIN 138</td>
<td>When the Local Plan was originally developed, it made sense to concentrate housing developments in the three market towns. However, it is not appropriate to merely extrapolate the original allocations to take the additional numbers required by the Inspector and the SHMA. In particular, it is not sustainable to allocate an additional 800 homes to the Chipping Norton SDA. The percentage of residents employed locally has been falling steadily over the last decade and is now below 30%. Employment growth in the County is centred on the ‘knowledge spine’ running from Bicester through Oxford to the South. Chipping Norton is too inaccessible to attract significant potential employers, who will want to locate near the clusters along the spine. Nevertheless it will still be appropriate to safeguard the allocation of 9 Ha for business use on the land north of the London Road, separated from dwellings. The main employment locally is for ‘minimum wage’ jobs in retail and caring sectors. New residents looking for professional or technical jobs will be forced to commute by car using the sub-standard A44 towards Oxford or the more dangerous A361 towards Banbury. The bus service to Oxford only runs hourly and has to cope with the severe congestion in the Wolvercote roundabout area. Access to the North Cotswold railway line at Kingham is also difficult – the connecting bus service is now sparse and unreliable following the County Council cuts, not as implied in para. 7.58. The additional 800 homes must be allocated nearer to Oxford with easy access to a railway line,</td>
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thereby linking easily to the main employment areas in the County. The modified Plan already picks up on this logic, by proposing the Eynsham garden village with good links to Hanborough station (and with the potential to be eventually linked to a re-opened railway line to Witney) and with employment areas nearer to the ‘knowledge spine’ clusters. The Chipping Norton "800" should therefore be reallocated to the Eynsham area or sites even nearer to Oxford, with a start date earlier than the 2021 proposed for the garden village.

The Chipping Norton Eastern Link Road proposed as part of the Tank Farm SDA will not achieve the reduction in HGVs through the town centre - the vast majority of HGVs are on the A44 towards Evesham, not on the A361. The link road will be a "road from nowhere to nowhere". The money on the link would be wasted and reduce the likelihood of achieving a proper Chipping Norton by-pass on the A44.

The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.

The dramatic increase in housing proposed for Tank Farm is excessive and completely out of proportion with the layout of the town especially with the large number of houses that are already being built. The original number of 600 that was proposed was already too large, but to increase this to 1400 is ridiculous as there is no local demand for this number of housing and a large number of homes will be far too excessive for local people and, so called ‘affordable housing’ is a misnomer as many locals cannot afford these. It also drives up the prices of the existing housing stock.

There has been little provision or thought for employment. Some companies, within Chipping Norton who want to expand and cannot get office space and especially not affordable space to build. This plan has no provision for for this so will drive these companies out of town causing more people to travel - mainly by car as many bus routes have been cut.

Many new people moving to this development will be from out of town so will be working in larger surrounding towns - travelling to other towns like Banbury, Witney, Stratford, Oxford or Cheltemham causing increased car usage and traffic problems. Chipping Norton already has a problem with traffic and pollution - this will only make it worse and could actually take trade away from what is a thriving town centre.

The ‘sweetener’ of a link road would not be effective as most traffic is on the A44 and is not heading to or from Burford - meaning that they would still have to go through the centre of town. I believe that Burford is also considering a weight limit.

Main 138: Paragraphs 9.4.40–9.4.50

8.16 Paragraphs 9.4.41-9.4.43 seek to explain the basis for increasing the size of the allocation from the 500 homes proposed in the Local Plan consultation paper (August 2014) to 1,400 homes proposed through the Main Modifications. Whilst this commentary is helpful to those commenting on the main modifications to gain an appreciation of the Council's approach, it is unnecessary for such text to be included in the final adopted Local Plan; the Local Plan policy approach should be supported and justified by the Local Plan’s evidence base. In accordance with the NPPF, the evidence base should be adequate, up-to-date and relevant in respect of the economic, social and environmental characteristics and prospects of the area (paragraph 158), GL Hearn therefore recommends deletion of these paragraphs.
8.17 In this regard, the commentary provided through this Plan modification fails to demonstrate a sound basis for the uplift in the scale and capacity of the allocation. Paragraph 9.4.42 advises that the site is not affected by flooding or heritage assets despite the presence of known potential archaeological significance in the area and the relative proximity of the site to the town centre, which is covered by a Conservation Area and contains numerous listed buildings. The text goes on to state that there are no significant constraints to the site coming forward, notwithstanding the site's location within the setting of the Cotswold Area of Outstanding Natural Beauty and the loss of best and most versatile agricultural land which the SA Addendum Report maintains as a major negative effect of the enlarged allocation (paragraph 4.42). Indeed the impact of the proposals on the landscape is entirely overlooked through the proposed modifications.

8.18 Whilst it is acknowledged that the site lies outside of the AONB and is relatively flat, significant outward expansion of Chipping Norton on the scale proposed in an elevated location close to the AONB would inevitably have an impact on landscape, which it would be reasonable to conclude may be adverse. A thorough up to date assessment based on the proposed scheme (not an earlier, smaller iteration) is essential before any firm conclusion can be drawn as to the soundness of the allocation.

8.19 At the time of the Pre-Submission Local Plan, the allocation of Tank Farm for 600 homes was based on the landscape evidence provided by the Chipping Norton Landscape Assessment (CNLA) (2009) prepared by Amanda Hopwood Landscape Consultancy64 and the Kirkham Landscape and Visual Review of Strategic Site Options (2014)65.

8.20 The CNLA assessed Tank Farm as part of the wider Area E1 "East of Chipping Norton: Plateau". It describes the area as plateau with a ridge side falling and steepening to the south east:

Much of the area is a high open landscape with high intervisibility...Development on the highest flatter ground [Tank Farm] would be prominent, but is capable of being screened; without screening it is an intrusion into the rural landscape to the south and east and at odds with the generally soft edges of the town.(ES29, CNLA).

8.21 The CNLA's findings continue at ES30:

Large scale development would be extremely prominent in the sloping edge of ridge location. A small scale extension no higher than 2 storeys into the field immediately east and south of the water tower could be acceptable, but only if set within a strong planted belt.

8.22 These findings were deemed to limit the potential for large scale development, of the type now proposed via the Local Plan modifications, at Tank Farm. They supported the identification of a single field, immediately south of the development known as Parker's Circus, avoiding further substantive incursion into the open countryside.

8.23 The area of land proposed through the Main Modifications for 200 homes and 9 hectares of employment uses was assessed by the CNLA as part of Area D. This relatively flat plateau sits immediately alongside the Cotswold AONB and has high local and medium district landscape/visual importance, with medium-high landscape/visual sensitivity. The assessment found that enclosure and screening of the site is fragile and any development near the south/east of the area would need wide additional screening belts along London Road and to the east of the development to mitigate...
8.24 The Kirkham Landscape and Visual Review of Chipping Norton Strategic Site Option 204 (May 2014) (LVR) was based on an assessment of Site 204 (38ha) taken from the Strategic Housing Land Availability Assessment (Figure 1F). The LVR acknowledges that the site lies within the setting of the Cotswold AONB (paragraph 3.1).

8.25 The LVR concluded that the proposed site option is:
In a sensitive landscape and visual location within E1 and (its development) will inevitably lead to an adverse landscape and visual impact on the perception of the eastern edge of the town and extend the town beyond its current containment by the ridgeline...A landscape-led approach to siting, layout, mass and scale of the development is therefore essential. (Paragraph 8.4, GL Hearn emphasis).

8.26 Whilst the LVR acknowledges that the impact of the development on the AONB should be low, this would be the case only if the following recommendations are met:

1. Exclusion of land south-east of the site (Table 8.3 recommends that the south-eastern part of the site option is omitted and retained as open fields due to the strong connection with the rolling landscape);
2. Development areas broken up by large-scale provision of open space, tree and woodland planting;
3. Provision of extensive tree belts including advance planting of major tree belts/woodland areas (minimum 30m wide) along the 220m contour plateau edge east of the water tower and school;
4. Design and layout to reflect the small-scale character of the town in a landscaped historic pattern.

8.27 Due to the sensitivity of the site; the elevated position and prominence in the landscape (viewed from the east); and location within the setting of the AONB, the LVR was able to support an estimated housing capacity limited to 500 homes on a development area smaller than that promoted through the SHLAA Update (2014).

8.28 The Council’s landscape evidence has not been refreshed to support the proposed modifications, and therefore the conclusions of LAN5 and LAN2 constitute the most up to date evidence to inform the proposed allocation of the SDA at Chipping Norton.

8.29 On this basis there is a surprising lack of evidence and justification for the expansion of the SDA as proposed; which comprises substantial expansion of the development area to the north and east and a more than doubling (133%) of the quantum of development. On the basis that the Council’s own landscape evidence does not support development on this scale (within an SA process that appears to assign great weight in certain cases to landscape sensitivity) and therefore the proposed modification to the SDA is unsound. To state simply that the site lies outside the AONB (9.4.42) and that by implication this removes any constraint in landscape terms is misleading having regard to the evidence base, especially so when the SA Addendum Report accepts there is “some uncertainty (remains) as details for mitigation/enhancement for landscape and biodiversity effects are dependent upon detailed masterplan.”

8.30 As is the case elsewhere within the Local Plan the Council appears content to rely on uncertain mitigation strategies as justification for allocating land for development in circumstances where the
8.31 The Council is relying on the Tank Farm area to provide development on a scale that the evidence base does not support in the absence of any alternative solution at Chipping Norton. The encircling of the town by the AONB dramatically curtails options for development. However, instead of acknowledging this constraint and therefore examining the available options across the three towns against one another, the Council has chosen to proceed with a partial analysis of development options limited to individual settlements, with no transparent explanation of how the uplift in numbers is apportioned.

8.32 The Council’s spatial strategy requires a significant proportion (or most depending on how the findings of the SA are interpreted) of housing growth to be directed to the three main towns of Witney, Carterton and Chipping Norton. In the context of the higher housing requirement to meet West Oxfordshire’s housing needs all reasonable alternatives for strategic development should be considered in a comparative manner to ensure that the most sustainable development proposals are brought forward to meet identified needs.

8.33 Delivery of 600 homes at Tank Farm was broadly consistent with the evidence base at the time of the Pre-Submission Local Plan and offered a relatively well-balanced and sound approach (in principle) to meeting the housing requirement as defined by the Council at the time, in accordance with the findings of the SA.

8.34 The proposed increase in the housing requirement to bring the target into line with the SHMA would now justify an approach to apportionment across the three towns that remains cognisant of the preferred spatial approach to distribution supported by the SA, and which recognises the relative capacity of each location to sustainably absorb further growth. This demands that options at the three towns should be compared against each other to ensure that, from a District-wide perspective, the most sustainable apportionment, taking all material factors into account is arrived at.

8.35 As rehearsed above, the Pre-Submission allocation of Tank Farm was limited to 600 homes on the basis of the landscape evidence, which does not support a greater scale of development. To maintain an approach consistent with the spatial strategy and the evidence base the Council should give proper consideration, on a comparative basis, to all reasonable alternatives for accommodating strategic development at the main towns, rather than adopt an approach which runs contrary to its own strategy and which sets the evidence base aside. However, the method adopted through the Council’s Sustainability Appraisal and Addendum has sought to appraise the strategic site options for each town in isolation. As a result, Tank Farm continues to perform well as a strategic development option at Chipping Norton because it is the ONLY development option at the town. No consideration has been given to its credentials compared with sites at Witney or Carterton.

8.36 In this regard, the LVR66 considered four options for outward expansion of Carterton. Whilst it acknowledged that the development of any of these options would result in some harm to the landscape, visual or settlement attributes, it recommended that all four options be pursued further as all had potential to meet West Oxfordshire’s housing needs. These options included the Crestland West of Carterton (Option B).
8.37 The LVR undertook a similar review of the four strategic development options around Carterton:

* Option A – East of Carterton
* Option B – West of Carterton
* Option C – Kilkenny Farm, Carterton
* Option D – North of Carterton

8.38 Of the four options D and A performed the best in landscape terms and the LVR indicated that reduced areas of these sites could be delivered in combination to deliver around 600 – 900 homes. The Council has since resolved to grant planning permission for 700 homes at East Carterton (Option A). Therefore it is reasonable to assume that delivery of North Carterton may only achieve a modest contribution towards the Council’s revised housing target.

8.39 The LVR also considered delivery of Option D concurrently with Option C. However, it concluded that the visual impact on the northern setting of Carterton would be “substantial”.

8.40 The LVR acknowledged that any development West of Carterton would lead to some harm, however, it was acknowledged that through comprehensive development as an integrated extension to the town, with its own settlement character, the site could achieve substantial development. Whilst the Council may have discounted land west of Carterton as too large, based on the lower housing target at the Pre-Submission stage, given the findings of the LVR, the Council should revisit the site’s potential as a reasonable alternative to other strategic development options across the three main towns as a sound and reasoned option for meeting the higher housing target. In this context, delivery of development West of Carterton would outperform the enlarged proposals for Tank Farm in landscape terms and would be capable of delivering in excess of the 800 new homes directed to Tank Farm.

Transport Impact

8.41 The Council seeks to justify the proposed expansion of the Tank Farm allocation in large part on the basis is will help to deliver an Eastern Link Road to divert traffic around the east of Chipping Norton to avoid the Air Quality Management Area within the town centre. Paragraph 9.4.43 advises that the link road would mitigate traffic impacts of additional growth and divert a large proportion of HGV movements away from Chipping Norton Town Centre, potentially delivering benefits to air quality.

8.42 The Chipping Norton Transport Options Study (July 2016), prepared by WYG evaluates the impact of potential residential development scenarios and associated transport schemes at Chipping Norton. A review of the existing network at AM and PM peak times found that all key highway links were operating within theoretical limits. However, it acknowledged that this was a strategic assessment based on a relatively simplistic and high level assessment of indicative capacities (paragraph 5.2.5).

8.43 The Study appraised the impacts of a 1,500 unit scheme at Tank Farm with the eastern link road taking the form of a distributor road capable of accommodating a larger volume of traffic than would be generated by the development, including HGV movements. It ‘concludes’ that 1,500 new homes would potentially give rise to an increase in traffic movements around Chipping Norton of
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive. The building of 1,400 homes at Tank Farm was one of these development options. The report also notes 'in each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre(paragraph 10.1.2). The study also attempted to 'identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End)' (paragraph 9.1.3). The report concludes that 'the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack of practicality, lack of capacity and potential for adverse environmental impact.'</td>
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<td>between 1% and 15%, compared to the 600 unit scheme, which appears to be somewhat inconclusive.</td>
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The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.

The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

**Road Safety**

Road safety issues in the centre of Chipping Norton are very closely connected with the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close proximity. It has been the site of several fatal accidents in recent years.

Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to ‘address the relatively high rate of fatalities and serious injuries on the District’s road network’ (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.

**Traffic**

The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:
The way the Transport Options Study was carried out

The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in March and were intended to assess "normal" traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren't the surveys carried out during these busier times of the week?

In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the town. Why wasn't the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:

"However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town."
resulting from a combination of redistribution and the increased level of development on the Tank Farm site."

* The report also reports that this option "would be likely to exacerbate air quality management issues" – paragraph 11.1.15.
* The health of residents and people working in the centre of Chipping Norton would be put further at risk - see section CN4 above.
* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1
In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would “operate well in excess of their theoretical capacity” and that the other 3 “would all remain operating within or, worst-case, at capacity for all of the potential development scenarios” – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that “the operational impact of additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate” – paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.

Other traffic related comments

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31.

The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ – paragraph 11.1.18.

However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘... there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’.

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn’t the Transport
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Options Study for Chipping Norton conclude that 'delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031' (paragraph 11.1.21)?

The Transport Options Study report also concludes that this option "would be likely to exacerbate air quality management issues" – paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:

* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.

* The town has been experiencing severe air quality issues and the associated detrimental effects on people’s health for at least a decade.

* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.

* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.

* All the time traffic through Chipping Norton increases and these problems get worse.

When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton’s traffic related problems? However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town’s residents and visitors to expect a better solution than this?

Car parking

Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: 'The availability of adequate public parking capacity is a key constraint in Chipping Norton' (paragraph 9.4.30) and 'Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate' (paragraph 9.4.60).

The Local Plan states: 'The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre' (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping.
A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and especially if doing a large weekly shop.

The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before development is permitted at the ECNSDA the problem of how to provide significant extra car parking capacity in the town centre needs to be resolved and funding secured for this.

School capacity

The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: ‘it is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation’ (paragraph 9.4.48).

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of school age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size. The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people

One of the Core Objectives identified in the Local Plan is: ‘CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel’ (paragraph 3.7).

Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally.

Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton: ‘Chipping Norton will strengthen its role as a centre of enterprise in the northern
part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.’ (paragraph 3.2)

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a relatively short time period must put at risk the special character of the town. Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that ‘the number of people living and working in the town has fallen from 50% to 36% since 2001’ (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes in the ECNSDA it is surely only a matter of time before one of the major supermarkets puts forward plans for a large new store on the outskirts of Chipping Norton.

Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.

There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: ‘Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre’ (paragraph 9.4.61). However there is no explanation of how pressures for ‘out of centre development’ will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA
Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

- Measures to reduce air pollution
- Improvements to road safety in Chipping Norton
- New road
- Other improvements to roads in and around the town
- Extra car parking
- Improving conditions throughout the town and surrounding areas for pedestrians and cyclists, including accessibility to bus and rail services
- New primary school
- Significant expansion of secondary school
- Mitigation measures for the impact on the Conservation Target Area (CTA) and the SSSI

Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask: where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?

If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be

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**MM714**  
G Pearman  
Mr Pearman  
1615  
> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 138  

My Client owns land to the east of the proposed allocation at the Chipping Norton SDA.

The changes made to Policy CN1 and CN2 set out in the proposed modifications are fully supported, especially the comprehensive development of the allocation via an agreed master plan whilst allowing for individual applications to come forward. In such a situation, it is important to put in place a mechanism to assist in the delivery of the infrastructure needed to support the development, including the proposed link road, new school and open space/landscaping.

In terms of delivery, my Client is working with other landowners and promoters to bring forward the proposed development in a timely manner.

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**MM727**  
Archstone Land  
Jonathan Porter  
Mr Porter  
1663  
> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 138  

The draft Plan could be considered unsound (not positively prepared or effective) if the proposed SDA with anticipated benefits are not deliverable.

This is a very significant increase in the number of dwellings which it is proposed to deliver through the SDA (almost three times the original figure). It includes all of the additional 600 dwellings for the sub-area, plus 200 re-distributed from the previous draft proposals.

A significant quantity of employment land (up to 7.3 hectares) and a new primary school were already proposed by the much smaller allocation for 600 homes. The only significant additional infrastructure offered by the new SDA for 1,400 homes is the link road. Notwithstanding whether the size of SDA is appropriate for Chipping Norton, it seems essential that the delivery of the road and very significant benefits as a result are proven before all of the site is allocated. Currently, the
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amount of diverted HGV traffic and the benefit to the Air Quality Management Area is uncertain.

The timing of the SDA and associated infrastructure is also relevant to consider in terms of the objectives of the Local Plan. Tank Farm has been a draft allocation for some 5 years and still no planning application has been forthcoming. The Housing Delivery Statement of Common Ground for the examination signed by the County and District in October 2015 anticipated occupation of 600 dwellings by 2021/22.

The revised draft housing trajectory suggests that the SDA will only contribute 200 homes over the next 5 years, with all 1,400 homes being completed by 2031. This would likely mean that the benefits from the scheme including the link road to alleviate traffic and poor air quality will not be delivered until near the end of the plan period. In the meantime, more refined measures in the town and new technologies may already have overcome the problem, leaving the road to become entirely enabling infrastructure for the SDA.

We also note the issues of landownership referred to with the allotments land owned by the Town Council. There will need to be assurances that this can be resolved in a timely manner to be certain that the link road and therefore a key motivation for the majority of the SDA is deliverable.

2.45 The Proposed Modifications to the Plan have sought to increase the scale of the development with 1,400 dwellings and 9ha of employment land now proposed, compared to the 600 dwellings and 1.5ha of employment land included for in the submission version of the Plan. The supporting text to the Policy notes that: "Whilst it is a significant increase in housing numbers and employment land provision for this site it is considered that this can be successfully accommodated on the site without undue harm in terms of landscape impact subject to appropriate mitigation, albeit with an extension of the site boundary. It will also help to deliver an alternative strategic transport link for the town and help ensure the viability of a new primary school both of which will be delivered as integral parts of the allocation."

2.46 Chipping Norton is identified as the second most sustainable settlement in the District (after Witney) and as such is considered to be an appropriate location to accommodate additional development to meet the needs of the District. In considering potential locations to accommodate additional development at Chipping Norton as a result of the increased housing requirement in the District, the Sustainability Appraisal Addendum Report highlights that:

"In order to meet with the required uplift in housing need identified, the Council considered again whether there are any other strategic options available and concluded that land to the east of the town remains the only potential direction of strategic growth due to AONB constraints."

2.47 We support the proposed allocation of land to the east of Chipping Norton to accommodate a significant proportion of the needs of the Sub-Area and the District as a
whole. The scale and location of the allocation is considered to be reflective of Chipping Norton's ranking in the settlement hierarchy and the sustainability of the existing settlement.

2.48 The boundaries of the allocation have been extended to the north and east in order to accommodate the increased quantum of development now proposed. Whilst our client’s site at the Pillars, south of Banbury Road had been identified in the submission version of the Local Plan as a SHLAA site with identified capacity to meet some of the wider housing requirement, it now forms part of this wider Strategic Development Area.

2.49 We support the allocation of the site and consider the proposed modification to be a sound approach which addresses the Inspector's concerns expressed in his Preliminary Findings: Part 2 regarding the status of the SHLAA sites and the need for these to be allocated. Our comments regarding the specific requirements of the proposed allocation and the evidence base underpinning the allocation are discussed in turn below.

Masterplanning and Principle of Early Release

2.50 Proposed criterion 'ai' of the Policy requires "comprehensive development for the whole site including land north and south of London Road to be led by an agreed masterplan."

2.51 The Council are currently proposing to address the current backlog in its housing requirement using the Liverpool method as opposed to the Sedgefield method which is advocated by the NPPG and this is borne out in numerous appeal decisions and case law. As per our submissions above we consider that the Plan should make provision to meet the backlog in housing need using the Sedgefield method.

2.52 As currently drafted concern is raised that criterion 'ai' of Policy CN1 would delay the delivery of early phases of the SDA. The supporting text to the Policy states that:

"Given the extent of the proposed SDA, the Council wishes to achieve a comprehensive development and would support in principle the preparation of an overall masterplan for the area incorporating both land to the south and north of the London Road. This would allow for individual applications to potentially come forward for parts of the site in the shorter-term without prejudicing delivery of a more advantageous, comprehensive scheme."

2.53 It is unclear what additional advantages the Council envisage being delivered beyond those secured through the other criterion of the Policy, such as the school. To ensure the Plan is effective it is important that any identified requirements of the proposed allocations are clearly specified to ensure their delivery, and indeed, are justified based on evidence. Furthermore additional requirements than those currently identified would need to be factored into the Strategic Development Area (SDA) Viability Update (2016) to ensure that the proposals are deliverable.

2.54 Although the Council have indicated that they would be supportive of parts of the site coming forward in the shorter-term, the Policy as currently drafted is considered to be ineffective in this regard.
2.55 As highlighted in Section One, an application for the proposed development of land south of Banbury Road, Chipping Norton (The Pillars) is currently pending determination with the LPA, under application reference 16/03416 for up to 100 new homes. This application was submitted in advance of the draft Plan being released and was therefore an unallocated site at that time. It is considered that this application would help to deliver a first phase of development of the SDA, which would contribute to the Council’s five year housing land supply.

2.56 Our comments in respect of the Eastern Link Road are set out in turn below and as such are not repeated here. In summary however the current planning application demonstrates the suitability of Chipping Norton as a location for development in general and the appropriateness of our client’s site in particular to accommodate this development. The range of studies that have been undertaken to support the planning application demonstrate that a high quality development will be achieved at the site, and that there are no environmental, technical or other reasons why planning permission should not be granted in this case. Further details of the proposals are provided in the Planning Statement at Appendix One and Design and Access Statement at Appendix Two.

2.57 We are in the process of working through the technical responses received in respect of the application with both West Oxfordshire District Council and Oxfordshire County Council. The application clearly demonstrates that there is no harm as a result of the proposals which would significantly and demonstrably outweigh the substantial benefits which would be achieved.

2.58 Notably the Council’s Housing Land Supply Position Statement (October 2016) anticipates that the SDA will deliver 200 dwellings to its five year housing land supply. Clearly the current application would make an important contribution towards this anticipated supply figure, and is the only part of the SDA on which an application has been submitted to date. To ensure the early delivery of part of the SDA as envisaged by the Local Plan and Housing Land Supply Position Statement it is important that the Policy requirements are proportionate and facilitate this delivery.

2.59 It is considered that our client’s site is appropriate to be released as an early phase of development and that flexibility should be introduced into the Policy to allow this to occur.

Eastern Link Road

2.60 Criterion d of the Policy requires:
"satisfactory vehicular access arrangements to be agreed in principle with the highway authority and demonstrated through a robust Transport Assessment (TA) to include the provision of an eastern link road connecting the Banbury Road to the B4026/A361 via London Road."

2.61 In seeking to justify the requirement, the supporting text to the Policy states:
"Transport evidence commission on behalf of the District Council by Oxfordshire County Council has tested the implications of a much larger scheme of up to 1,500 dwellings and concludes that if supported by an eastern link road not only would the traffic impact
2.62 The only evidence base document published in support of the Local Plan Proposed Modifications consultation related to transport at Chipping Norton is the 'WYG Transport Planning Chipping Norton Transport Options Study (July 2016)'. The Local Plan supporting text correctly identifies that the Study has assessed a range of options including the delivery of 1,500 dwellings. Importantly however the Study has only assessed the implications of an eastern distributor road linking the A44 London Road to the north of the site and the A361 Burford Road to the south.

2.63 It is clear from the Study that no assessment has been undertaken as part of this work to the effects of extending this eastern distributor road further north to connect with Banbury Road. Clearly in order for this requirement to be justified then additional evidence is required regarding the need for the road to extend up to Banbury Road. At this stage concern is raised that the requirement for the eastern distributor road to extend to Banbury Road is potentially unsound and is certainly not justified in the evidence base.

2.64 The draft Plan makes clear that the route of the eastern distributor road shown on Figure 9.12 is purely indicative. The Chipping Norton Transport Options Study has itself not provided any indication as to the most appropriate route for the road, and in any event, given the concerns raised above, would have provided no indication of its preferred routing in connecting up to Banbury Road.

2.65 From the work undertaken in respect of the current planning application for our client's site at The Pillars, we do have concerns regarding the current indicative alignment and consider that a location to the east of the existing cricket club may prove a more appropriate solution. This would ensure the cricket club is not isolated from the existing settlement by the proposed link road, particularly given the enhanced pedestrian connections to the town centre proposed to be facilitated by the development at The Pillars.

2.66 Furthermore it is questioned whether a link road so close to the centre of Chidding Norton would result in the improvements anticipated by the District and County Council's or whether a connection further to the east, if the northern extent of the proposed road is any event justified or required, may be more appropriate and draw more traffic away from the town centre and AQMA. Clearly further investigation is required on this matter.

2.67 Given the uncertainties and lack of clear evidence regarding the eastern distributor road identified above; understandably the Council have been unable to provide costings for the road in its Infrastructure Delivery Plan (2016). This lack of information also affects the Strategic Development Area (SDA) Viability Update in respect of Chipping Norton. We consider the Viability Update in greater detail below and as such do not repeat our comments here.

2.68 As highlighted above, the supporting text for the Policy states that the proposed link road will mitigate the effects of the proposed SDA, and in addition will have a beneficial
impact on the AQMA by diversion of HGV movements out of the town centre. The link road is therefore not required purely to meet the needs of the development itself, and would have wider benefits required to mitigate the existing AQMA issues. Once clarification is provided as to the scale, form and associated costings of the link road consideration must be given by WODC to the funding arrangements for the road given it is not justified to meet the needs of the development itself.

2.69 The Infrastructure Delivery Plan as currently drafted anticipates that the road will be delivered purely by the East Chipping Norton SDA. Given the above such an approach is not considered to be justified. It is noted that whilst for the East Chipping Norton Link Road the Infrastructure Delivery Plan comments that it “would alleviate traffic through the centre of Chipping Norton and help to deliver improvements to the Air Quality Management Area (AQMA)” with regards to the northern distributor road to be provided as part of the North Witney SDA the Infrastructure Delivery Plan states that it is “necessary to support strategic growth to the north of Witney.” The CIL Regulations make clear that any infrastructure contributions must be directly related to the proposed development, and it is apparent that this is not the case in respect of the East Chipping Norton Link Road and as such the cost of the road should not fall to be funded purely by the developers of the SDA.

2.70 Discussions are ongoing with WODC and OCC in respect of the current planning application for the proposed development at The Pillars including in respect of the requirement for the eastern link road. A further meeting is scheduled for January 2016 to discuss this matter and it is anticipated that significant progress will be made ahead of the resumption of the EIP in Spring 2017. As such we wish to reserve our right to comment further on this matter as discussions and unfold, and, if appropriate, we will seek to agree a Statement of Common Ground with WODC/OCC in respect of this matter ahead of the resumption of the EIP.

Sustainability Appraisal

2.71 Enfusion, on behalf of WODC, have prepared a Sustainability Appraisal Addendum Report in respect of the proposed modifications to the Local Plan. In respect of the increased scale and quantum of development proposed at the east Chipping Norton SDA, the Addendum advises that “it is considered that the findings of the strategic level SA [CD2} still remain relevant and valid.” In summary the Addendum concludes that: “the proposed modifications to the strategic site option [and Policy CN1] remove some uncertainties, confirm mitigation measures for potential negative effects, and offer potential enhancements. Some uncertainty remains as details for mitigation/enhancement for landscape and biodiversity effects are dependent upon detailed masterplanning.”

2.72 We support the conclusions of the Sustainability Appraisal Addendum and consider the current application for the development of The Pillars, forming the northern most part of the allocation, demonstrates the sustainability of the proposed allocation. The application demonstrates that the uncertainty regarding landscape and biodiversity can be appropriately addressed in respect of this element of the SDA.

2.73 Given the scale of increase of the proposed SDA since the previous Sustainability
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<td>-</td>
<td>Cala Homes Chiltern</td>
<td>1732</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments raised above. Strategic Development Areas Viability Update 2.74 As highlighted above the Local Plan consultation is supported by a Strategic Development Areas (SDA) Viability Update (2016) prepared by Aspinall Verdi. Our concerns regarding the proposed eastern link road have been discussed in detail above and as such are not repeated here. The remaining uncertainties regarding the link road do however have clear implications for the robustness of the Viability Update as at this stage the Council have been unable to cost the link road or secure appropriate funding mechanisms given the requirement for the link road is directly related to the SDA itself. 2.75 A further update is therefore likely to be required to the viability work once further clarity is received on this matter. 2.76 In addition it is noted that the current appraisal for the Chipping Norton SDA identifies a construction cost for infrastructure in year seven of £8,000,000. This is the only infrastructure cost identified in the appraisal. Clearly given the discussion above this cost is not related to the eastern link road. The SDA is also required to deliver a primary school however the Infrastructure Delivery Plan identifies a costing for this of £9,000,000. 2.77 As such it is unclear what the £8,000,000 cost relates to and further clarity will be required in order to ensure the Plan is justified and effective and that the SDA is deliverable.</td>
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<td>Cala Homes Chiltern</td>
<td>1743</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL</td>
<td>CALA fully supports the proposed modification 138. It is working with other landowners and developers to bring forward the proposed development. However, further highway modelling is required to identify the level of benefit that the proposed link road would bring, the type/width of road and its precise alignment. All of these factors could have significant effects on the viability of the SDA. The work will be taken forward as part of the detailed design of the SDA and covered in a comprehensive Transport Assessment. As such the Local Plan must retain a flexible approach to the provision and delivery of the road. In addition, the road is indicatively shown passing over land outside of the SDA boundary. The Council should consider funding from other developments in the Chipping Norton Sub area that would directly benefit from it (as per the wording within Policy T2). The Council must also be willing to use compulsory purchase powers to ensure delivery of the road as a last resort in the public interest.</td>
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CALA fully supports the increase in houses allocated to the east of Chipping Norton as set out in Policy CN1. CALA in previous representations sought a comprehensive development of the SDA. It therefore supports the proposed changes set out at paragraph CN1 – ai) to require the comprehensive |
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| MM738         | Cala Homes Chiltern     | Cala Homes (Chiltern) | -                | Cala Homes (Chiltern) | 1748       | **LEVEL > Chipping Norton Sub Area > MAIN 138**

- Development of the whole of the SDA to be led by an agreed masterplan. Supporting commentary in paragraph 9.4.45 confirms that this approach will allow for applications to come forward for parts of the site in the shorter-term without prejudicing delivery of a bigger, comprehensive scheme. CALA Homes (Chiltern) agrees with this approach.

- Through this approach it is important to set out a mechanism to secure delivery and funding of key infrastructure (the link road, open space and education facilities). The local planning authority will need to use its powers through the planning application stage to ensure comprehensive delivery.

- It is noted at Appendix 2, that delivery of housing to the east of Chipping Norton is expected between 2017 and 2031. CALA is working collaboratively with the County Council, other landowners and key stakeholders to ensure timely delivery of the site. There is currently a planning application in for circa 100 dwellings on land to the north of London Road. This timescale is therefore achievable and realistic.

- **Paragraph 9.4.44a**

  - CALA recognises the need for a road around the east of the Town and the benefits that this could bring. However, further highway modelling is required to identify if this road is required as currently set out in the Main Modifications, the type of road and its precise alignment.

  - As such CALA requests, as per paragraph 9.4.44a of the Local Plan that the route for the link road remains indicative at this stage to provide flexibility in the detailed design stage. Commentary should be amended to include that the route of the link road should be subject to the masterplanning of the whole site to ascertain the best location and that the viability of the road needs to be assessed.

  - CALA also seeks changes to ensure that other developments in the Chipping Norton sub-area contribute financially to the road if they would benefit from it.

  - The Plan needs to acknowledge that the Council would, as a last resort, consider use of compulsory purchase powers to enable delivery of the road.

- **Paragraphs 9.4.43b and 9.4.44**

  - As set out in representations prepared for the Council’s Pre-Submission Plan in May 2015 the plan accompanying Policy CN1 (Figure 9.12) contains a substantial area of landscape buffering (‘Environmental enhancements including landscape mitigation’, shaded green) to the southern side of the site. It is clear from the Landscape Mitigation Report prepared by Lockhart Garrett (May 2015) that accompanied the May 2015 representations, that such an expansive area is entirely unnecessary and unjustified and should be reduced.

  - It is acknowledged that this part of the site has a higher degree of landscape sensitivity but that the detailed design work for the site will be best placed to more accurately identify the extent of mitigation required. It is a significant concern that the inclusion of such a buffer on the plan will prejudice the proper, comprehensive and effective masterplanning of the site.

- **Paragraph 9.4.44 sets out that at this stage, the extent of the developable area shown is only indicative. This will in turn be informed as part of the comprehensive masterplan which will be**
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<td></td>
<td>Kirsty Garrett</td>
<td>Miss Garrett</td>
<td>Garrett</td>
<td>179</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>The proposed development is far too large for a town that already suffers from congestion and problems with air quality. Although the proposed link road would theoretically divert some traffic from the town centre, in practise the majority of the “through” traffic continues along the A44, and would therefore be wholly unaffected by the proposal. Furthermore, the proposed new road would deposit vehicles into the already-congested area around the Burford and Churchill Roads, thus compounding the existing problems. The area proposed for development sits at the top of a relatively steep hill, and so although it is theoretically within a short walk/cycle from the town centre, in practise this is unmanageable for people with disabilities, young children and the elderly. Consequently, it is likely that the majority of residents in the proposed new housing would need to drive into the town centre to access shops and facilities, compounding the congestion, parking and air quality problems already faced by the town centre. As I have already highlighted elsewhere, the majority of residents in the new development will need to commute out of the town to access work - adding to the significant congestion problems that are already experienced by the town’s residents who commute to Oxford and further afield for work.</td>
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<tr>
<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>Unknown</td>
<td>1966</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>Chipping Norton Sub Area The Chipping Norton sub area anticipated delivery in Table 9.3 only amounted to 2,326 and could not deliver 2,400 as suggested by Policy H1 (74 less). Notwithstanding this, a reduction in the Tank Farm proposed allocation to revert to 600 homes should be made and as a consequence the Chipping Norton sub area should plan for 1,530 homes (a reduction of 870 homes). Tank Farm Main Modification 138 relates to a sizable uplift in allocation number for Land East of Chipping Norton Strategic Development Area (SDA). Previously, the proposed allocation was for 600 homes now includes provision north of London Road. The Sustainability Addendum October 2016 concluded that with the addition of an eastern link road which would reduce previous air quality concerns. The additional housing is reliant on infrastructure delivered on land which is in control of the Town Council. Furthermore, a substantial piece of land within the allocation is a Conservation Target Area (CTA). The CTA as stated in Main Modification 68 as the potential to be an Ecological constraint, however, it remains to be explored whether the proposal would cause harm to the CTA. Accordingly, the allocation should not be increased in size and should remain at 600 homes. Figure 9.12 (map of site) subject to MM139 should be amended as a consequence, and MM140 amended to reflect the 600 homes in draft Policy CN 1 due to concerns regarding the justification for and deliver of the additional dwellings proposed.</td>
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| MM752        | Bloombridge             | Bloombridge             | Mr               | Cutler            | 1967       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 138                                                                 | Chipping Norton Sub Area  
The Chipping Norton sub area anticipated delivery in Table 9.3 only amounted to 2,326 and could not deliver 2,400 as suggested by Policy H1 (74 less). Notwithstanding this, a reduction in the Tank Farm proposed allocation to revert to 600 homes should be made and as a consequence the Chipping Norton sub area should plan for 1,530 homes (a reduction of 870 homes).  
Tank Farm  
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Policy CN 1 due to concerns regarding the justification for and deliver of the additional dwellings proposed.                                                                                                                                                                                                                                                                                                                                                     |
| MM786        | Oxfordshire County Council | Amada Jacobs (OCC)          | Mrs               | Jacobs            | 2253       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 138                                                                 | 9.4.43  
... diversion of a large proportion of HGV movements ...  
9.4.44a  
In connecting the London Road to the B4028/A361 ...  
9.4.45  
This would allow for individual applications ...  
9.4.47  
... ‘through route’ from north to south will be needed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| MM96         | Ms B Wright             | Ms                      | Gray             |                  | 240        | > SECTION 9 - STRATEGY AT THE LOCAL                                                                 | Chipping Norton currently has around 3000 homes; increasing the size of the town by a further 1400 (plus other developments currently going through) will increase the size of the town by 50%.  
The existing services and roads will not cope with this level of increase. This is a small market town and the current infrastructure struggles to cope already. The junctions at Albion Street, London...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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<td></td>
<td></td>
<td>Ms B Wright</td>
<td>Ms</td>
<td>Gray</td>
<td>242</td>
<td>LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>Road and Banbury Road are frequently brought to a standstill, and Horsefair already has illegally high levels of pollution.</td>
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<tr>
<td>MM96</td>
<td></td>
<td>Ms B Wright</td>
<td>Ms</td>
<td>Gray</td>
<td>244</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>The volume of HGV and cars along the A44 (the site of the proposed development in Chipping Norton) as shown by the WYG Chipping Norton Transport Options document, A096781, points 2.1.3 and 3.2.1 stress the need to address the already illegal levels of pollution along the A44 (High Street/Horsefair). A link road as proposed would not reduce these levels as most traffic does not travel to the Burford Road, but travels along the A44.</td>
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<tr>
<td>MM99</td>
<td>none - resident</td>
<td>J A Hurley</td>
<td>Mrs</td>
<td>Hurley</td>
<td>255</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>The proposed 1400 homes to be built in Chipping Norton cannot be supported by the current infrastructure of the town. The Ambulance station has been closed, the fire service is to be reduced, the Horton hospital is to reduced, Chipping Norton hospital was downgraded. The road networks within the town serve approx. 3000 homes; to increase the town by 50% will present huge problems for car users. For pedestrians the pavements will feel even less safe; therefore increasing car usage and for cyclists the risk of using the roads will feel too great. The quality of life therefore will be greatly affected for those living in the town.</td>
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<td>MM99</td>
<td></td>
<td>A K Tredre-Short</td>
<td>Mr &amp; Mrs</td>
<td>Tredre-Short</td>
<td>303</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>Some housing development is required in Chipping Norton but the scale proposed of circa 1400 houses would alter the distinctive character of the town irrevocably and do little to reduce daily travel times as more and more new residents commute to Oxford, Banbury, Birmingham and London to work. It would be better to locate large areas of new housing development in the District closer to strategic transport links to the east. I would also question the deliverability of the housing allocation for Chipping Norton. What Chipping Norton really needs is good local employment opportunities before substantial numbers of new houses are built. The fact the town has employment land which has been sitting empty for a decade or more suggests the issue is not availability of land but rather the appetite of employers for locating within the town at some distance from the M40 / A34.</td>
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<td>MM128</td>
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<td>A K Tredre-Short</td>
<td>Mr &amp; Mrs</td>
<td>Tredre-Short</td>
<td>303</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>With regard to 9.4.41/42/43, mention is made of no flooding issues. However, the Parker Knoll experienced drainage problems. Additionally, the existing properties on the western edge of the SDA are substantially lower than the Tank Farm field. Covering Tank Farm in building will likely create the potential for flooding of the lower lying properties. These properties were until very recently within the town’s conservation zone, but were arbitrarily removed without consultation. This also removed certain planning restrictions which would have applied to any Tank Farm development. Whilst it is outside of the AONB, the western edge of the SDA is the boundary of the AONB, therefore issues of view must be considered.</td>
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- The provision of a relief road is being used as a mitigation issue for the increased number of 1400 properties. • As a mitigation of air quality issues in the town, there is a possibility that some HGV traffic would use it, but it is likely to cause other air quality issues.
As an example, the large number of new build housing in Buckingham has 2 entrance/exit points which means that most of the traffic from those houses creates hold ups while trying to access the A421 Buckingham bypass. It is highly likely that a Chipping Norton relief road would experience exactly the same issue.

Consider the issue of moving traffic as opposed to queuing traffic. Currently air quality is bad with the existing traffic which, on the whole, moves without traffic jams. 1400 new houses would create traffic jams, even with a relief road. HGVs would avoid the queuing which would probably occur near the new houses and the new supermarket areas of Aldi and the proposed M&S. It is quite possible therefore that HGVs would still head through the town.

With regard to 9.4.43a/9.4.43b and the potential employment areas. Recent experience has brought in supermarket and Premier Inn jobs, all mostly minimum wage, plus the proposed M&S store. All create increased traffic movements, far beyond people simply commuting to their place of work. Any effort to bring in more higher value employment is likely to run into issues of poor broadband internet provision caused by the increase of 40% in the town population, assuming there is no upgrade to the network.

New business provision is likely to experience the traffic issues outlined above.

For a town with circa 3,000 dwellings currently, expansion of 1,400 on the Tank Farm area to the east of town is completely disproportionate. It would of course completely change the town’s character, but in practical terms it would:
- Develop a valuable farmland area that should not be developed, even though it is not formally included in the “conservation area”;
- Increase the already excessive levels of (traffic) solution;
- Make excessive demands on the town’s already stretched infrastructure - parking, health services and schools, water and drainage.

His modification increases significantly the number of properties to be built in the Chipping Norton SDA. This is backed up by unsound evidence and is not appropriate to the existing community. In particular:

a) Part of the Vision in section 3.2 is to “play a role in helping to meet wider needs, without significant change to the intrinsic character of the District.” Increasing the population of the town by 50% will inevitably change its character. Especially as the driver for the increase is the need to house those working in Oxford, so turning a working town into a dormitory town.

b) Core Objective CO2 is to “Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.” This fails for the same reasons as the Vision statement.

c) Core Objective CO3 is to “Promote safe, vibrant and prosperous town and village centres and resist proposals that would damage their vitality and viability or adversely affect measures to improve those centres.” Whilst a modest increase in population will help the town, this huge increase, aimed at commuters into Oxford, will be detrimental. The plan mentions that the
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<td>Mr Flawn</td>
<td>741</td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 138</td>
<td>proposed development is within walking and cycling distance of the town centre, although it offers no evidence to support this. I visit the town centre most days and have never seen more than one bicycle in the cycle parking there. The area around the town is too hilly for most of the population to cycle. A straw poll of people living in the Parkers Circus estate (which is closer to the town centre than is the SDA) indicates that none walk when going into town to do their shopping. These were all fit, active people. The town centre is also not safe. In the last few years, people have been killed by passing traffic while on the pavement at Horsefair. The proposed link road appears to be a &quot;road to nowhere&quot; as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this relief road. This increase in traffic will also affect air quality, which is already at illegal levels.</td>
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<td>MM382</td>
<td>Chipping Norton Town Council</td>
<td>Chipping Norton Town Council Mrs V Oliveri</td>
<td>Mrs Oliveri</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE</td>
<td>General comments. Chipping Norton is one of the highest towns in West Oxon and is built mainly on hills with narrow streets except for the main roads of M4 and A361 in places the underground infrastructure</td>
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CHIPPING NORTON NEIGHBOURHOOD PLAN - on 3rd March 2016 a referendum was held in the town accepting the CNNP which was then adopted. In this plan it was mentioned in several places that any future development has to be sustainable and it is felt that whilst 600 homes on Tank Farm were possibly sustainable 1400 homes are not - please see notes 213141516 below. It is felt that WODC in their draft Local Plan entirely ignoring the spirit of the CNNP.

In February 2014 the Town accepted that it would have to take some new houses and reluctantly agreed that 600 on the area known as Tank Farm (the south half of the SDA) could be acceptable subject to suitable planning and mix of houses and infrastructure.

Little contact has been made since then except for a plan that was attached to a planning application in the nearby area in the middle of 2015. Nothing officially has been given since the meeting on 14th February 2014 until 23rd August 2016 when in a meeting between CNTC and OCC a plan using 800 homes plus 80 extra care beds was tabled and alterations suggested including no access at the southerly perimeter.

The next contact was the recent suggestion of 1400 houses. Considering that the allotment land to the south of the SDA is owned by the Town it seems strange that discussion about the possible of purchase of any land requirement has not yet happened - for sake of absolute clarity the William Fowler Allotment land is not for sale.

We also get the impression that some pressure might have been brought to bear on local land owners to go along with OCC plans - and please bear in mind that the majority of the land we are discussing is owned by OCC - thank goodness there are some ‘ransom sites’to protect the town from being totally overrun and spoilt.

We also feel that discussions with other stakeholders have not taken place - we back this statement up with the recent planning application at the Pillars which is adjacent to the northern edge of the SDA with no vehicular access which apparently shows no coherent masterplan. Chipping Norton Town Council totally reject the new local plan for the SDA for the following reasons in brief :-

1) 1400 new homes on Tank Farm are not sustainable

2) The local employment of residents has fallen over the last 10 years and is now below 30%

3) The majority of local employment tends to be ‘low paid’ jobs in retail,catering and caring sectors

4) ‘High paid’ jobs i.e. professional or technical jobs tend to be in what is now-called the ‘knowledge spine’which is difficult to access from Chipping Norton unless you drive as we have a poor train and bus service
5) Narrow and congested roads (including the main A441A361 at Horsefair where the worst pollution in Oxfordshire has been ignored for many years by OCC and WODC. The best long term solution to Horsefair are the road improvements needed around the Rollright Stones, which have been discarded due to cost - now budgeted at €18 million by OCC’s consultants.

6) The cost of the Eastern Relief road has not yet been tabled but has to be close to the figures in 5).

7) The traffic figures being used from the survey carried out by WYG are erroneous - two points immediately stand out - a) it is stated that there have been no traffic related accidents in Horsefair in the last 5 years - we know that there have been 3 DEATHS in the period and b) it is stated that the busiest time of the day on Burford Road (A361) at Chipping Norton School (a large comprehensive 1200 pupils) is between 0700 and 0800, but in reality this is really 0815 to 0845.

8) We dispute the figures given to us by OCC and others which show that only 30% of the HGV’s that transit through Horsefair use the 4361 towards Burford and a massive 100% use the A44 east and west towards Oxford/Moreton-in-Marsh / Evesham and the 4361 north to Banbury.

9) We have been advised by independent traffic consultants that the figures are probably nearer to 15% respectively 85%. We therefore consider the Eastern Relief Road to be ill-advised.

10) An independent expert has recently been shown our traffic problem and has walked around the town and agrees with the Town Council that a one way system using Albion Street and the High Street would go a long way to deter HGV’s and improve the air quality, ease congestion and add a few badly needed parking spaces. This could be achieved comparatively quickly and at a much lower cost than building either road.

MM388

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| Ainscough Strategic Land | Ainscough Strategic Land | Ainscough Strategic Land | Chipping Norton SDA (MM138) | 4.2 As part of MM138, land East of Chipping Norton SDA (also known as Tank Farm) has increased from 600 units to 1,400 units, 9ha of employment land, a new link road, primary school, local centre and other requirements. Our principal issues with the ability for this site to deliver relates to its capacity and the complexities associated with delivering the site.  

4.3 Ownerships: The Chipping Norton SDA include two parcels of land, that to the north and south of London Road. There are two private landowners to the north of London Road, and three landowners to the south of London Road including Oxfordshire County Council (OCC) who own the majority of the site, Cala Holmes and a private landowner who owns the land east of the proposed link road.  

4.4 With five separate land ownerships, it is clear that it will not be the most straightforward allocation to deliver in a collective manner as each land owner will have their own priorities / requirements to address which inevitably draws out the process of delivery. Indeed, there are already some issues apparent. |
4.5 An application has submitted in October 2016 by Gallagher Estates for 100 homes on part of the SDA north of London Road (16/03416/OUT). Whilst this is not an issue in itself and would tie in with the Council’s aspiration to see earlier delivery on this part of the site, it is noteworthy that the applicant has not sought to accommodate the required link road and OCC have therefore objected to the scheme.

4.6 Capacity: This is the key issue associated with the site.

4.7 To address the housing requirement within the Chipping Norton sub-area the Council have simply increased the capacity of the single SDA within this sub-area from 600 homes to 1400 homes. The capacity is now more than double than that envisaged within the Submission Draft Plan, and almost three times that of the draft allocation, yet the site has not been increased significantly in size based on Figure 9.12 of the modified Local Plan.

4.8 The extended SDA boundary within the Proposed Modifications includes two main additional parcels of land. One is north of London Road. The other includes existing woodland that is located to the proposed link road, which we would regard as not being suitable for development particularly given it is located in an Area of Conservation for ecological purposes.

4.9 The Proposed Modification envisages that the 200 homes will be provided north of London Road and 1,200 homes south of London Road13. We consider this to be highly optimistic particular given the additional land identified to the south is existing woodland or identified as an area of environmental enhancement on the plan.

4.10 Indeed, representations to the Submission Draft Local Plan by OCC, relating to the land south of London Road, identified the capacity of the Chipping Norton SDA as 652 homes14 (Appendix 7). Indeed, OCC promoted the original increase of the strategic allocation from 550 homes to 660 homes at the time. We are also aware that Savills have made representations on behalf of the promoter CALA Homes, including a Landscape Assessment prepared by Lockhart Garrett (May 2015), which suggest that there was capacity for 700 units on the site south of London Road (Appendix 8).

4.11 It is therefore somewhat worrying that the Sustainability Appraisal Addendum Report (October 2016) states that

"studies indicate that the site could be extended and provided additional houses from 600 to 1,400" yet no capacity studies have been made available to the public and there is no meaningful increase in land take to justify this level of uplift. Indeed, the SA notes that a number of impacts cannot be fully assessed until a master planning process has been carried out.

4.12 Due to these concerns, we have carried out our own capacity analysis of the site. The gross site area of the Chipping Norton SDA is approximately 69.1 ha. The gross residential developable area is 32.8 ha when taking into account the requirement if Policy CN1 and elements shown on Figure 9.12 of the modified Local Plan, which include:

- Employment area (8.3ha);
- Link road (4.7ha);
- Primary school (2.2ha);
- Local centre (2ha); and,
4.13 Of this 32.8 ha gross developable area for residential development, we have applied an industry standard 30% ratio to take account of key spine roads, informal open space, play area, etc, which would result in a 23 ha net developable area. Applying a residential density of 30 dph to this area (which allows for internal road space), the net area results in 689 dwellings across the SDA.

4.14 We note there is a suggestion at paragraph 9.4.44a that the existing allotments could be relocated elsewhere. It is not suggested this land would be made available for residential development and we note this land is not shown within the boundary of the SDA in Figure 9.12. However, even if this land was to be included and development took place to the west of the suggested Link Road route, the capacity of the site would still only deliver circa 780 units across the SDA.

4.15 This indicates that the SDA requirement of 1,400 homes is highly optimistic and we have seen no evidence to suggest this level of development could be accommodated. Indeed, even if you increased the density to 40 dph, which we do not considered would be suitable for the area or delivered by Cala Homes, the capacity of the SDA site would struggle to deliver even 1,000 units.

4.16 In light of this, the Chipping Norton sub-area will not meet it housing target of 2,400 units over the plan period. Additional allocations would enable the Council to address this, such as the suggested site north of Primsdown Industrial Estate, Worcester Road.

4.17 Infrastructure and Delivery: The SDA requires a spine road through the site linking the A44 London Road to the north of the site and the A361.15. We accept that development north of London Road would not necessarily need to wait until the delivery of the link road before being occupied. However, any applications on this parcel of land would need to accommodate the principle of the route.

4.18 Of the remaining homes to the south, whilst it is noted that OCC and Cala Homes are actively promoting the site for development, given the extent to which the parameters of this SDA have altered in recent months, it is reasonable to assume that an application is still some way off and that the delivery of new homes will be delayed. Indeed, far from any detailed design being available on the link road, there is not even any basic alignment drawings for the Link road, which will need to be agreed between the main land owners and progressed. This will take time and is not a simple exercise.

4.19 Conclusions: For the purpose of progressing the delivery calculations from the SDAs, and despite the fact we do not consider the site can accommodate this level of development, we have assumed the capacity of this site will be no more than 1,000 units. This is despite the fact that our robust analysis of the site suggests it will deliver far less.

4.20 In terms of first completions, we accept that some early delivery on the land north of London Road is achievable. Even so, given there is still no permission in place and the current outline application that has been submitted is clearly not compliant with what Oxfordshire County Council wish to achieve (i.e. it does not provide for the link road), we've assumed the first developer would start completing from 2019-20 and the second parcel of land to the north would start delivering shortly afterwards.
4.21 For the remaining land to the south, we believe this is going to take longer to come forward. Ultimately, we think 2 developers would be active on this part of the site (Cala and another). As such, delivery rates are unlikely to go much above 60 units per annum. Based on the NLP rates for a site of this size, it would be 67 dwellings per annum. We have rounded this up to 70 dwellings per annum for ease.

4.22 Even if we assumed an application was also lodged next year, which we think is optimistic the complexities of this site and the fact that the parameters for the scheme have altered considerably, using NLP’s analysis for a lead in period beyond this point for a site of this size (5.3 years), it would result in completions from 2022-23. Ultimately, we consider this to be a reasonable position to take and it would result in a total of 630 units being completed on land south of London Road and 180 to the north, resulting in 810 units across the entire SDA within the plan period.

4.23 As such, even if more could be squeezed out of the site in terms of physical capacity, compared to what we envisage based on our capacity analysis, it is highly unlikely that this would be delivered in the plan period anyway.
However, it may prove very hard to resist the early redevelopment of the Parker Knoll site, and it is also evident that there is much less of a critical dependency attached to the bringing forward of land to the north of London Road for commercial and employment purposes, as this should not greatly constrain the manner or timing of how land to the south is brought forward.

It may also prove to be necessary to progress early delivery of these portions of the allocation, before a comprehensive Master Plan can be prepared and agreed.

Para 9.4.47: provision of North-South Link Road and southern access to Chipping Norton SDA:
Stagecoach notes and strongly endorses the conclusions of the County Council, that both congestion and air quality in the centre of Chipping Norton require that an eastern link road is provided as part of proposals for comprehensive development of the Strategic Development Area East of the town.

Para. 9.4.50 Stagecoach urges that a site of approximately 0.15 Ha. for a replacement bus Operating Centre should be identified with suitable (preferably direct) access from London Road as exactly that kind of necessary infrastructure needed to support the sustainable development of the town. The operational and locational requirements for such a facility are quite particular, and these very greatly constrain the number of suitable sites that reasonably could be considered in any locality. In a largely rural district, with particular landscape and visual sensitivities and a dearth of established employment areas, these constraints are especially severe. Exactly these conditions apply in the case of Chipping Norton.

Stagecoach therefore urges that, given the effective lack of credible alternatives, consideration be given in policy to making provision for a replacement operating Centre within the Local Plan proposals for Chipping Norton, to allow the effective provision of existing bus services to, from and within the town, and for their future improvement. Without such provision it would be a great deal harder to sustain the first journeys from the town in the morning, as would the final arrivals in the evening. At the very least, it would be greatly harder to justify additional service improvements, as “dead” mileage of up to 40 minutes would be required in each direction to depots at Banbury or Oxford.

The nature of this difficulty has already been recognised by the Town Council, and led to attempts being made in the Neighbourhood Plan to try to secure a site allocation. The independent examination of the Neighbourhood Plan concluded that this was properly a matter to be considered through the Local Plan Review.

8.46 Notwithstanding objections to the expansion of Tank Farm, the principle of a comprehensive development supported by an overall masterplan of the area is supported.

8.47 Paragraph 9.4.45 states:
Given the extent of the proposed SDA, the Council wishes to achieve a comprehensive development and would support in principle the preparation of an overall masterplan for the area incorporating both land to the south and north of the London Road. This would allow for individual applications to potentially come forward for parts of the site in the shorter-term without prejudicing delivery of a
8.48 The land allocated at Tank Farm through the Pre-Submission Local Plan was owned by two main parties, namely Oxfordshire County Council and CALA Homes. Expansion of the allocation has brought a number of other land owners into the draft allocation. Paragraph 9.4.44a advises that the proposed eastern link road is likely to be routed across land within the ownership of the Town Council. The Town Council's Mayor, Michael Tysoe has announced publicly the Council's opposition to the proposed expansion of the Tank Farm allocation (Banbury Guardian, 18 October 2016). It therefore reasonable to question whether the Town Council will be willing to release its land to facilitate provision of the road link. Paragraph 9.4.43a also notes that land north of London Road is being actively promoted for development by various parties.

8.49 Therefore, a key advantage of the smaller allocation, namely the limited number of landowners, has been lost through its expansion; the involvement of multiple land interests is likely to slow the pace of delivery through the planning process.

8.50 It is also unlikely to be appropriate to allow individual parcels of land to be brought forward under separate planning applications. Notwithstanding the policy requirement to agree a masterplan, delivery of the site should be carefully co-ordinated to ensure timely delivery of key infrastructure regarded by the Council as crucial to the successful delivery of the enlarged scheme.

8.51 The eastern link road is identified as a key component of the proposed Tank Farm SDA, and is required to help alleviate traffic impacts in the town centre and to contribute to the objective of improving air quality within the AQMA - a core objective of the Local Plan (CO16). The Chipping Norton Transport Options Study (July 2016) explores opportunities to deliver the eastern link road either as a spine road to the development or a distributor road. The distributor road is favoured by the study on the basis of an ability to carry a greater volume of traffic including HGVs around the periphery of the town. However this is not reflected within the access proposals described at 9.4.47 which refers simply to "a 'through route' from north to south". The alignment of the road is yet to be established and therefore it remains uncertain how the eastern link road will be delivered; what land interests will be affected; the proportion of the cost of the scheme, which is to be met by the developer(s) and the Council's expectations in respect of delivery alongside the phasing of development.

8.52 The Council has sought to justify the expansion of Tank Farm through delivery of the eastern link road. However, the policy fails to provide sufficient detail on the form of highway infrastructure required to support this level of development and to demonstrate that the proposed housing and employment development is capable of funding the infrastructure. Moreover, there is no apparent assessment of the visual impact of the eastern link road on the setting of the AONB. In the absence of these details, the expansion of Tank Farm is unsound and unjustified.

MM741 | CPRE Oxfordshire | Helen CPRE Oxon | Mrs Marshall | 1606 | Document Full Path: > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area |

The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive.

There is also a new proposal for an 'eastern link road' which is also covered in changes MAIN 136 to MAIN 144 to the Local Plan.
CPRE wishes to raise objections to these proposed changes on the following grounds.

**Air Quality**

WYG were appointed by Oxfordshire County Council to prepare a strategic Chipping Norton Transport Options Study (CNTOS).

This study concluded that 'Given that an existing AQMA is already declared in this location, it might be reasonable to conclude that all development options would be likely to exacerbate air quality management issues' (paragraph 11.1.6 of the report). The building of 1,400 homes at Tank Farm was one of these development options. The report also notes 'In each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre (paragraph 10.1.2).

The study also attempted to 'identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End)' (paragraph 9.1.3).

The report concludes that 'the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack of likely effectiveness and / or unacceptable knock-on impacts' (paragraph 10.6.1).

The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.

The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

**Road Safety**

Road safety issues in the centre of Chipping Norton are very closely connected with the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close...
proximity. It has been the site of several fatal accidents in recent years. Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to 'address the relatively high rate of fatalities and serious injuries on the District's road network' (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.

Traffic

The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:

- Other traffic related comments

The way the Transport Options Study was carried out

The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in March and were intended to assess "normal" traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren't the surveys carried out during these busier times of the week?

In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the
town. Why wasn’t the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:

  "However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town resulting from a combination of redistribution and the increased level of development on the Tank Farm site."

* The report also reports that this option "would be likely to exacerbate air quality management issues" - paragraph 11.1.15.

* The health of residents and people working in the centre of Chipping Norton would be put further at risk – see section CN4 above.

* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1

In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would “operate well in excess of their theoretical capacity” and that the other 3 “would all remain operating within or, worst-case, at capacity for all of the potential development scenarios” – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that "the operational impact of additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate" – paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.
**Other traffic related comments**

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31.

The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ – paragraph 11.1.18.

However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘.... there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’.

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn't the Transport Options Study for Chipping Norton conclude that ‘delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031’ (paragraph 11.1.21)?

The Transport Options Study report also concludes that this option “would be likely to exacerbate air quality management issues” – paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:

* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.
* The town has been experiencing severe air quality issues and the associated detrimental effects on people’s health for at least a decade.
* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.
* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.
* All the time traffic through Chipping Norton increases and these problems get
worse.

When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton's traffic-related problems. However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town’s residents and visitors to expect a better solution than this?

Car parking

Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: ‘The availability of adequate public parking capacity is a key constraint in Chipping Norton’ (paragraph 9.4.30) and ‘Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate’ (paragraph 9.4.60).

The Local Plan states: ‘The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre’ (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping.

A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and especially if doing a large weekly shop.

The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before development is permitted at the ECNSDA the problem of how to provide significant extra car parking capacity in the town centre needs to be resolved and funding secured for this.

School capacity

The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: ‘it is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation’ (paragraph 9.4.48).

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of
| School age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size. The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people

One of the Core Objectives identified in the Local Plan is: 'CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel' (paragraph 3.7).

Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally.

Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton:

‘Chipping Norton will strengthen its role as a centre of enterprise in the northern part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.’ (paragraph 3.2)

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a relatively short time period must put at risk the special character of the town. Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that ‘the number of people living and working in the town has fallen from 50% to 36% since 2001’ (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes...
Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.

There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: ‘Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre’ (paragraph 9.4.61). However there is no explanation of how pressures for ‘out of centre development’ will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA

Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

- Measures to reduce air pollution
- Improvements to road safety in Chipping Norton
- New road
- Other improvements to roads in and around the town
- Extra car parking
- Improving conditions throughout the town and surrounding areas for pedestrians and cyclists, including accessibility to bus and rail services
- New primary school
- Significant expansion of secondary school
- Mitigation measures for the impact on the Conservation Target Area (CTA) and the SSSI

Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask: where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?

If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real
Concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be

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| MM724         | Gallagher Estates Limited | Gallagher Estates Limited | - | Gallagher Estates Limited | 1691 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 139 | Main 138-139 – Policy CN1: Land East of Chipping Norton Strategic Development Area (SDA) – 1,400 homes - and Supporting Text

Principle of the Allocation

2.45 The Proposed Modifications to the Plan have sought to increase the scale of the development with 1,400 dwellings and 9ha of employment land now proposed, compared to the 600 dwellings and 1.5ha of employment land included for in the submission version of the Plan. The supporting text to the Policy notes that:

"Whilst it is a significant increase in housing numbers and employment land provision for this site it is considered that this can be successfully accommodated on the site without undue harm in terms of landscape impact subject to appropriate mitigation, albeit with an extension of the site boundary. It will also help to deliver an alternative strategic transport link for the town and help ensure the viability of a new primary school both of which will be delivered as integral parts of the allocation."

2.46 Chipping Norton is identified as the second most sustainable settlement in the District (after Witney) and as such is considered to be an appropriate location to accommodate additional development to meet the needs of the District. In considering potential locations to accommodate additional development at Chipping Norton as a result of the increased housing requirement in the District, the Sustainability Appraisal Addendum Report highlights that:

"In order to meet with the required uplift in housing need identified, the Council considered again whether there are any other strategic options available and concluded that land to the east of the town remains the only potential direction of strategic growth due to AONB constraints."

2.47 We support the proposed allocation of land to the east of Chipping Norton to accommodate a significant proportion of the needs of the Sub-Area and the District as a whole. The scale and location of the allocation is considered to be reflective of Chipping Norton's ranking in the settlement hierarchy and the sustainability of the existing settlement.

2.48 The boundaries of the allocation have been extended to the north and east in order to accommodate the increased quantum of development now proposed. Whilst our client’s site at the Pillars, south of Banbury Road had been identified in the submission version of the Local Plan as a SHLAA site with identified capacity to meet some of the wider housing requirement, it now forms part of this wider Strategic Development Area.

2.49 We support the allocation of the site and consider the proposed modification to be a sound approach which addresses the Inspector's concerns expressed in his Preliminary Findings: Part 2 regarding the status of the SHLAA sites and the need for these to be allocated. Our comments regarding the specific requirements of the proposed allocation and the evidence base underpinning the allocation are discussed in turn below.
Masterplanning and Principle of Early Release

2.50 Proposed criterion ‘ai’ of the Policy requires "comprehensive development for the whole site including land north and south of London Road to be led by an agreed masterplan."

2.51 The Council are currently proposing to address the current backlog in its housing requirement using the Liverpool method as opposed to the Sedgefield method which is advocated by the NPPG and this is borne out in numerous appeal decisions and case law. As per our submissions above we consider that the Plan should make provision to meet the backlog in housing need using the Sedgefield method.

2.52 As currently drafted concern is raised that criterion ‘ai’ of Policy CN1 would delay the delivery of early phases of the SDA. The supporting text to the Policy states that:

"Given the extent of the proposed SDA, the Council wishes to achieve a comprehensive development and would support in principle the preparation of an overall masterplan for the area incorporating both land to the south and north of the London Road. This would allow for individual applications to potentially come forward for parts of the site in the shorter-term without prejudicing delivery of a more advantageous, comprehensive scheme."

2.53 It is unclear what additional advantages the Council envisage being delivered beyond those secured through the other criterion of the Policy, such as the school. To ensure the Plan is effective it is important that any identified requirements of the proposed allocations are clearly specified to ensure their delivery, and indeed, are justified based on evidence. Furthermore additional requirements than those currently identified would need to be factored into the Strategic Development Area (SDA) Viability Update (2016) to ensure that the proposals are deliverable.

2.54 Although the Council have indicated that they would be supportive of parts of the site coming forward in the shorter-term, the Policy as currently drafted is considered to be ineffective in this regard.

2.55 As highlighted in Section One, an application for the proposed development of land south of Banbury Road, Chipping Norton (The Pillars) is currently pending determination with the LPA, under application reference 16/03416 for up to 100 new homes. This application was submitted in advance of the draft Plan being released and was therefore an unallocated site at that time. It is considered that this application would help to deliver a first phase of development of the SDA, which would contribute to the Council’s five year housing land supply.

2.56 Our comments in respect of the Eastern Link Road are set out in turn below and as such are not repeated here. In summary however the current planning application demonstrates the suitability of Chipping Norton as a location for development in general and the appropriateness of our client’s site in particular to accommodate this development. The range of studies that have been undertaken to support the planning application demonstrate that a high quality development will be achieved at the site, and that there are no environmental, technical or other reasons why planning permission should not be granted in this case. Further details of the proposals are provided in the
Planning Statement at Appendix One and Design and Access Statement at Appendix Two.

2.57 We are in the process of working through the technical responses received in respect of the application with both West Oxfordshire District Council and Oxfordshire County Council. The application clearly demonstrates that there is no harm as a result of the proposals which would significantly and demonstrably outweigh the substantial benefits which would be achieved.

2.58 Notably the Council’s Housing Land Supply Position Statement (October 2016) anticipates that the SDA will deliver 200 dwellings to its five year housing land supply. Clearly the current application would make an important contribution towards this anticipated supply figure, and is the only part of the SDA on which an application has been submitted to date. To ensure the early delivery of part of the SDA as envisaged by the Local Plan and Housing Land Supply Position Statement it is important that the Policy requirements are proportionate and facilitate this delivery.

2.59 It is considered that our client’s site is appropriate to be released as an early phase of development and that flexibility should be introduced into the Policy to allow this to occur.

Eastern Link Road

2.60 Criterion d of the Policy requires: “satisfactory vehicular access arrangements to be agreed in principle with the highway authority and demonstrated through a robust Transport Assessment (TA) to include the provision of an eastern link road connecting the Banbury Road to the B4026/A361 via London Road.”

2.61 In seeking to justify the requirement, the supporting text to the Policy states: “Transport evidence commission on behalf of the District Council by Oxfordshire County Council has tested the implications of a much larger scheme of up to 1,500 dwellings and concludes that if supported by an eastern link road not only would the traffic impact of the additional growth be able to be mitigated but there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality – a key issue for the town.”

2.62 The only evidence base document published in support of the Local Plan Proposed Modifications consultation related to transport at Chipping Norton is the “WYG Transport Planning Chipping Norton Transport Options Study (July 2016)”. The Local Plan supporting text correctly identifies that the Study has assessed a range of options including the delivery of 1,500 dwellings. Importantly however the Study has only assessed the implications of an eastern distributor road linking the A44 London Road to the north of the site and the A361 Burford Road to the south.

2.63 It is clear from the Study that no assessment has been undertaken as part of this work to the effects of extending this eastern distributor road further north to connect with Banbury Road. Clearly in order for this requirement to be justified then additional evidence is required regarding the need for the road to extend up to Banbury Road. At
this stage concern is raised that the requirement for the eastern distributor road to extend to Banbury Road is potentially unsound and is certainly not justified in the evidence base.

2.64 The draft Plan makes clear that the route of the eastern distributor road shown on Figure 9.12 is purely indicative. The Chipping Norton Transport Options Study has itself not provided any indication as to the most appropriate route for the road, and in any event, given the concerns raised above, would have provided no indication of its preferred routing in connecting up to Banbury Road.

2.65 From the work undertaken in respect of the current planning application for our client’s site at The Pillars, we do have concerns regarding the current indicative alignment and consider that a location to the east of the existing cricket club may prove a more appropriate solution. This would ensure the cricket club is not isolated from the existing settlement by the proposed link road, particularly given the enhanced pedestrian connections to the town centre proposed to be facilitated by the development at The Pillars.

2.66 Furthermore it is questioned whether a link road so close to the centre of Chipping Norton would result in the improvements anticipated by the District and County Council’s or whether a connection further to the east, if the northern extent of the proposed road is any event justified or required, may be more appropriate and draw more traffic away from the town centre and AQMA. Clearly further investigation is required on this matter.

2.67 Given the uncertainties and lack of clear evidence regarding the eastern distributor road identified above: understandably the Council have been unable to provide costings for the road in its Infrastructure Delivery Plan (2016). This lack of information also affects the Strategic Development Area (SDA) Viability Update in respect of Chipping Norton. We consider the Viability Update in greater detail below and as such do not repeat our comments here.

2.68 As highlighted above, the supporting text for the Policy states that the proposed link road will mitigate the effects of the proposed SDA, and in addition will have a beneficial impact on the AQMA by diversion of HGV movements out of the town centre. The link road is therefore not required purely to meet the needs of the development itself, and would have wider benefits required to mitigate the existing AQMA issues. Once clarification is provided as to the scale, form and associated costings of the link road consideration must be given by WODC to the funding arrangements for the road given it is not justified to meet the needs of the development itself.

2.69 The Infrastructure Delivery Plan as currently drafted anticipates that the road will be delivered purely by the East Chipping Norton SDA. Given the above such an approach is not considered to be justified. It is noted that whilst for the East Chipping Norton Link Road the Infrastructure Delivery Plan comments that it “would alleviate traffic through the centre of Chipping Norton and help to deliver improvements to the Air Quality Management Area (AQMA)” with regards to the northern distributor road to be provided as part of the North Witney SDA the Infrastructure Delivery Plan states that it is "necessary to support strategic growth to the north of Witney.” The CIL Regulations make clear that any infrastructure contributions must be directly related to the proposed
development, and it is apparent that this is not the case in respect of the East Chipping Norton Link Road and as such the cost of the road should not fall to be funded purely by the developers of the SDA.

2.70 Discussions are ongoing with WODC and OCC in respect of the current planning application for the proposed development at The Pillars including in respect of the requirement for the eastern link road. A further meeting is scheduled for January 2016 to discuss this matter and it is anticipated that significant progress will be made ahead of the resumption of the EIP in Spring 2017. As such we wish to reserve our right to comment further on this matter as discussions unfold, and, if appropriate, we will seek to agree a Statement of Common Ground with WODC/OCC in respect of this matter ahead of the resumption of the EIP.

Sustainability Appraisal

2.71 Enfusion, on behalf of WODC, have prepared a Sustainability Appraisal Addendum Report in respect of the proposed modifications to the Local Plan. In respect of the increased scale and quantum of development proposed at the east Chipping Norton SDA, the Addendum advises that “it is considered that the findings of the strategic level SA [CD2] still remain relevant and valid.” In summary the Addendum concludes that: “the proposed modifications to the strategic site option [and Policy CN1] remove some uncertainties, confirm mitigation measures for potential negative effects, and offer potential enhancements. Some uncertainty remains as details for mitigation/enhancement for landscape and biodiversity effects are dependent upon detailed masterplanning.”

2.72 We support the conclusions of the Sustainability Appraisal Addendum and consider the current application for the development of The Pillars, forming the northern most part of the allocation, demonstrates the sustainability of the proposed allocation. The application demonstrates that the uncertainty regarding landscape and biodiversity can be appropriately addressed in respect of this element of the SDA.

2.73 Given the scale of increase of the proposed SDA since the previous Sustainability Appraisal was undertaken, to ensure the Plan is underpinned by a robust evidence base we would recommend that the detailed appraisal of the allocation be updated in full to support the summary provided in the Addendum Report. This will help to further demonstrate that the proposed strategy is justified, subject to our comments raised above.

Strategic Development Areas Viability Update

2.74 As highlighted above the Local Plan consultation is supported by a Strategic Development Areas (SDA) Viability Update (2016) prepared by Aspinall Verdi. Our concerns regarding the proposed eastern link road have been discussed in detail above and as such are not repeated here. The remaining uncertainties regarding the link road do however have clear implications for the robustness of the Viability Update as at this stage the Council have been unable to cost the link road or secure appropriate funding mechanisms given the requirement for the link road is directly related to the SDA itself.
**2.75** A further update is therefore likely to be required to the viability work once further clarity is received on this matter.

2.76 In addition it is noted that the current appraisal for the Chipping Norton SDA identifies a construction cost for infrastructure in year seven of £8,000,000. This is the only infrastructure cost identified in the appraisal. Clearly given the discussion above this cost is not related to the eastern link road. The SDA is also required to deliver a primary school however the Infrastructure Delivery Plan identifies a costing for this of £9,000,000.

2.77 As such it is unclear what the £8,000,000 cost relates to and further clarity will be required in order to ensure the Plan is justified and effective and that the SDA is deliverable.

**CALA supports the proposed boundary for the Land East of Chipping Norton SDA as set out on figure 9.12.**

However, as per our previous representations the area of landscape mitigation shown on the plan (shaded green) should be deleted. The previously submitted Landscape Mitigation Report prepared by Lockhart Garrett (May 2015) concluded that such an expansive area was entirely unnecessary. It accepted that a “narrow ‘buffer’ area combined with the retention of existing vegetation features would be sufficient to reduce landscape impacts to an appropriate level, and that the open space provision within the development should be used to enable a green infrastructure-led landscape design process with green corridors permeating the entire development. This can be addressed at the masterplanning stage”.

It is acknowledged that this part of the site has a higher degree of landscape sensitivity but that the detailed design work for the site will be best placed to more accurately identify the extent of mitigation required. There is no need for the extent of landscape mitigation to be be identified on the plan. The text at paragraph 9.4.43b and bullet “c“ in Policy CN1 recognises the need for appropriate landscape mitigation.

**As set out in representations prepared for the Council’s Pre-Submission Plan in May 2015 the plan accompanying Policy CN1 (Figure 9.12) contains a substantial area of landscape buffering (‘Environmental enhancements including landscape mitigation’, shaded green) to the southern side of the site. It is clear from the Landscape Mitigation Report prepared by Lockhart Garrett (May 2015) that accompanied the May 2015 representations, that such an expansive area is entirely unnecessary and unjustified and should be reduced.**

It is acknowledged that this part of the site has a higher degree of landscape sensitivity but that the detailed design work for the site will be best placed to more accurately identify the extent of mitigation required. It is a significant concern that the inclusion of such a buffer on the plan will prejudice the proper, comprehensive and effective masterplanning of the site.

**In the Draft Local Plan the Public Right of Way from Glyme Hall was included in the red line area as a**
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1082</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN140 for the addition of a criterion relating to the investigation, recording and safeguarding of the archaeological significance of the area prior to the commencement of development and to the results of that investigation informing the final layout of the development, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework.</td>
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<td>MM45</td>
<td>Nigel Rose</td>
<td>Mr</td>
<td>Rose</td>
<td></td>
<td>111</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>When the Local Plan was originally developed, it made sense to concentrate housing developments in the three market towns. However, it is not appropriate to merely extrapolate the original allocations to take the additional numbers required by the Inspector and the SHMA. In particular, it is not sustainable to allocate an additional 800 homes to the Chipping Norton SDA. The percentage of residents employed locally has been falling steadily over the last decade and is now below 30%. Employment growth in the County is centred on the ‘knowledge spine’ running from Bicester through Oxford to the South. Chipping Norton is too inaccessible to attract significant potential employers, who will want to locate near the clusters along the spine. The main employment locally is for ‘minimum wage’ jobs in retail and caring sectors. New residents looking for professional or technical jobs will be forced to commute by car using the sub-standard A44 towards Oxford or the more dangerous A361 towards Banbury. The bus service to Oxford only runs hourly and has to cope with the severe congestion in the Wolvercote roundabout area. Access to the North Cotswold railway line at Kingham is also difficult – the connecting bus service is now sparse and unreliable following the County Council cuts, not as implied in para. 7.58. The additional 800 homes must be allocated nearer to Oxford with easy access to a railway line, thereby linking easily to the main employment areas in the County. The modified Plan already picks up on this logic, by proposing the Eyesham garden village with good links to Hanborough station (and with the potential to be eventually linked to a re-opened railway line to Witney) and with employment areas nearer to the ‘knowledge spine’ clusters. The Chipping Norton “800” should therefore be reallocated to the Eyesham area or sites even nearer to Oxford, with a start date...</td>
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<td>MM518</td>
<td></td>
<td>Hilary Powell</td>
<td>Mrs</td>
<td>Powell</td>
<td>1267</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>earlier than the 2021 proposed for the garden village. The Chipping Norton Eastern Link Road proposed as part of the Tank Farm SDA will not achieve the reduction in HGVs through the town centre - the vast majority of HGVs are on the A44 towards Evesham, not on the A361. The link road will be a &quot;road from nowhere to nowhere&quot;. The money on the link would be wasted and reduce the likelihood of achieving a proper Chipping Norton by-pass on the A44. The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.</td>
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<td>MM598</td>
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<td>J.A. Nicholls &amp; J.A. Krouse</td>
<td>-</td>
<td>Nicholls &amp; Krouse</td>
<td>1374</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>We object to the above application on the following grounds: This is too many houses in Chipping Norton. Accepting the fact that 600 units is not an acceptable share of West Oxfordshire responsibilities for more housing in the SOUTHERN ENGLAND AREA we believe an increase in the development of this land, of well over 65% should be acceptable. In any case the 1000 units will in fact place an unacceptable burden on the current Local Authority support services a) Sewage disposal - already overloaded b) Traffic &amp; parking already overloaded c) Doctors surgery already overloaded d) Exhaust pollution already over the limit The 1000 units represents a major increase of over 65% on the original plan and must be</td>
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accompanied by improvements in support functions as outlined above in A to D. Failure on this point will lead to a disastrous increase in housing population, people and totally unacceptable burdens on services.

The other major conditions of this application must be the construction of 2 link roads, one to the West of Chipping Norton (not shown) and one as detailed in the planning application, i.e. to the North East of Chipping Norton. Both of these link roads would bring a much needed traffic and pollution reduction to the town centre, badly needed now, without the addition of a further 1000 units being constructed.

The definition of affordable housing should be explained in terms of a price comparison between normal prices and affordable prices. This would ensure that prices being offered are fair and affordable.

The Bellway Homes development should be monitored to see that it is achieving adequate sales and that there is therefore a clear and uncompromising demand for another 1000 properties in Chipping Norton.

No due consideration of the effects on the local population of dumping of an extraneous invasion, without thought of employment and services in depth.

1) 1400 new houses will overwhelm Chipping Norton and change its character forever.
2) Not enough consideration into alternative plans have been considered.
3) New link road goes nowhere! So will not help our traffic problems.

Main 140

8.53 These representations raise no objection in principle to the allocation of Tank Farm as a location for housing development at Chipping Norton. However, the substantial expansion of the proposed SDA from 600 to 1,400 dwellings and the addition of a further 9 hectares of employment land are not justified by the evidence.

8.54 For the reasons set out in representations to Main 138 and 139, the expansion of the allocation is not supported by the Council’s evidence base. The landscape evidence relied upon for Chipping Norton has not been reviewed to take into account the proposed modifications and therefore it is reasonable to assume that the Council does not dispute the findings of the Kirkham
Report67, which supports up to 500 dwellings at the site. The Sustainability Appraisal Addendum Report 2016 acknowledges that the findings of the detailed SA in February 2015 in respect of Tank Farm remain relevant and valid.

8.55 Paragraph 4.40 of the SA Addendum states that the: expanded site will still have major positive effects for housing with concomitant minor positive effects for health and well-being;...Positive effects for community SA objectives are strengthened as the larger scale of development could provide further green infrastructure to be detailed in masterplanning.

8.56 The previous SA identified minor negative effects on landscape, as it abuts the AONB, and is adjacent to the Chipping Norton Conservation Area. The SA Addendum purports that the expansion of the development can be accommodated without undue harm to the landscape assets although some uncertainty remains about the significance of effects until detailed masterplan and mitigation measures are established.

8.57 The minor negative effects upon landscape associated with the 600 unit scheme were a result of careful consideration of the recommendations of the Kirkham Report to limit the extent of the development thereby avoiding the most visually prominent parts of the site. Whilst the SA acknowledges that the impact on the setting of the AONB needs to be addressed, the Kirkham Report identifies issues beyond the AONB, noting that the site is located within a sensitive landscape in an area with a high level of inter visibility to the south and east. It concludes that development will inevitably lead to an adverse landscape and visual impact on the perception of the eastern edge of the town and therefore recommends that development is contained within the 220m contour, with wide tranches of woodland planting to screen the development. Subject to these provisions the report concludes that the impact on the AONB should be low.

8.58 However, the proposed expansion of the SDA would step well beyond the limitations established by the Kirkham Report. The report considered a development of up to 900 homes but concluded that around 500 dwellings was the maximum that could be supported in landscape terms. The Council has failed to provide any additional evidence to justify the substantial uplift in the scale of development now proposed; moreover the landscape evidence base fails to provide any assessment of the impact of development above 900 homes, or of the provision of major highway infrastructure or employment development.

8.59 The provisions of Policy CN1 criterion c) in respect of the provision of appropriate landscape measures to mitigate the potential impact of the development are inadequate to overcome the harm to the landscape which would be caused by the enlarged SDA. THE SA Addendum Report recognises that some uncertainty remains as to the significance of effects on the landscape in the absence of detailed masterplanning and mitigation measures. Therefore, if the degree of harm to the landscape remains uncertain, the principle of expanding the allocation prior to further work being undertaken by the Council to confirm that adequate measures can be put in place to mitigate the impact of the development on the AONB and wider landscape is considered to be unsound.

8.60 For the reasons set out in respect of main modification 139, criterion d) lacks the clarity required by an allocation policy to ensure the timely delivery of the eastern link road. The Council's Infrastructure Delivery Plan (November 2016) includes the East Chipping Norton Link Road (page 63). However, the estimated costs and funding gap are "to be identified" with no funding secured to date. On this basis there is no certainty that can be offered to potential developers at this stage on
### Respondent Details

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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1607</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
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8.61 There remains a lack of evidence to justify the expansion of the allocation East of Chipping Norton and a lack of clarity on the cost burden placed upon the developer to deliver the infrastructure and mitigation deemed necessary to enable delivery of the allocation. The increase in the scale of development at the SDA proposed via the modifications is considered to be unjustified having regard to the evidence base and is therefore unsound.

The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive.

There is also a new proposal for an ‘eastern link road’ which is also covered in changes MAIN 136 to MAIN 144 to the Local Plan.

CPRE wishes to raise objections to these proposed changes on the following grounds.

Air Quality

WYG were appointed by Oxfordshire County Council to prepare a strategic Chipping Norton Transport Options Study (CNTOS).

This study concluded that ‘Given that an existing AQMA is already declared in this location, it might be reasonable to conclude that all development options would be likely to exacerbate air quality management issues’ (paragraph 11.1.6 of the report).

The building of 1,400 homes at Tank Farm was one of these development options. The report also notes ‘in each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre(paragraph 10.1.2).

The study also attempted to ‘identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End)’ (paragraph 9.1.3).

The report concludes that ‘the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack of likely effectiveness and / or unacceptable knock-on impacts’ (paragraph 10.6.1).

The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping
Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.

The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

Road Safety

Road safety issues in the centre of Chipping Norton are very closely connected with the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close proximity. It has been the site of several fatal accidents in recent years.

Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to ‘address the relatively high rate of fatalities and serious injuries on the District’s road network’ (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.

Traffic

The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:

- Other traffic related comments

The way the Transport Options Study was carried out
The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in March and were intended to assess "normal" traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren't the surveys carried out during these busier times of the week?

In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the town. Why wasn't the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:

"However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town resulting from a combination of redistribution and the increased level of development on the Tank Farm site."

* The report also reports that this option "would be likely to exacerbate air quality
management issues” – paragraph 11.1.15.
* The health of residents and people working in the centre of Chipping Norton would be put further at risk - see section CN4 above.
* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1
In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would “operate well in excess of their theoretical capacity” and that the other 3 “would all remain operating within or, worst-case, at capacity for all of the potential development scenarios” – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that "the operational impact of additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate" – paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.

Other traffic related comments

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31.

The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ – paragraph 11.1.18.

However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘…. there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’.

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn't the Transport Options Study for Chipping Norton conclude that 'delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031’ (paragraph 11.1.21)?
The Transport Options Study report also concludes that this option “would be likely to exacerbate air quality management issues” – paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:

* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.

* The town has been experiencing severe air quality issues and the associated detrimental effects on people’s health for at least a decade.

* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.

* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.

* All the time traffic through Chipping Norton increases and these problems get worse.

When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton’s traffic related problems. However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town’s residents and visitors to expect a better solution than this?

Car parking

Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: ‘The availability of adequate public parking capacity is a key constraint in Chipping Norton’ (paragraph 9.4.30) and ‘Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate’ (paragraph 9.4.60).

The Local Plan states: ‘The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre’ (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping.

A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and
especially if doing a large weekly shop.

The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before development is permitted at the ECNSDA the problem of how to provide significant extra car parking capacity in the town centre needs to be resolved and funding secured for this.

School capacity

The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: ‘it is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation’ (paragraph 9.4.48).

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of school age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size. The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people

One of the Core Objectives identified in the Local Plan is: ‘CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel’ (paragraph 3.7).

Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally. Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton:

‘Chipping Norton will strengthen its role as a centre of enterprise in the northern part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.’ (paragraph 3.2)
The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a relatively short time period must put at risk the special character of the town.

Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that 'the number of people living and working in the town has fallen from 50% to 36% since 2001' (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes in the ECNSDA it is surely only a matter of time before one of the major supermarkets puts forward plans for a large new store on the outskirts of Chipping Norton.

Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.

There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: 'Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre’ (paragraph 9.4.61). However there is no explanation of how pressures for ‘out of centre development’ will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA
Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

- Measures to reduce air pollution
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| MM714        | G Pearman               | Mr Pearman      | * Improvements to road safety in Chipping Norton  
* New road  
* Other improvements to roads in and around the town  
* Extra car parking  
* Improving conditions throughout the town and surrounding areas for pedestrians and cyclists, including accessibility to bus and rail services  
* New primary school  
* Significant expansion of secondary school  
* Mitigation measures for the impact on the Conservation Target Area (CTA) and the SSSI  
Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask: where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?  
If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be  
My Client owns land to the east of the proposed allocation at the Chipping Norton SDA.  
The changes made to Policy CN1 and CN2 set out in the proposed modifications are fully supported, especially the comprehensive development of the allocation via an agreed master plan whilst allowing for individual applications to come forward. In such a situation, it is important to put in place a mechanism to assist in the delivery of the infrastructure needed to support the development, including the proposed link road, new school and open space/landscaping.  
In terms of delivery, my Client is working with other landowners and promoters to bring forward the proposed development in a timely manner. |
| MM719        | Empire Homes Limited   |                | INTRODUCTION AND SUMMARY  
i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Empire Homes Limited who have land north of the A44 and south of the Banbury Road, Chipping Norton under their control. The land extends to approximately 42 hectares and is identified on the plan attached as Appendix 1 to these representations.  
ii. Empire Homes Limited object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30), CN1 (MM140) and CN2 (MM143) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.  
iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only 2.7 year supply can be demonstrated. Edgars consider that additional sites are required to |
be allocated to ensure sufficient housing land supply.

iv. Land north of the A44 and south of the Banbury Road, Chipping Norton is available and capable of delivering residential development in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. The following representations provide further information on the land north of the A44 and south of the Banbury Road, Chipping Norton.

1.0 DELIVERY AT EAST CHIPPING NORTON SDA (Policy CN1, MM138-MM140)

1.1 The East Chipping Norton allocation has been increased from about 600 dwellings at Tank Farm south of the London Road to 1,400 dwellings including 1,200 dwellings south of London Road and 200 north of London Road. The SDA now includes the provision of an Eastern Link Road.

1.2 Limited evidence has been published to demonstrate and assess the impacts of the increased allocation. The previous assessment of Strategic Site Options (Examination Document Ref OTH1) has not been updated. This provides a comprehensive overview of the site and a summary of the site constraints and impacts.

1.3 There would appear to be no evidence document which provides a summary of the modified East Chipping Norton SDA and its constraints. The SHELAA assesses a number of component sites but there is no expression of the overall size of the site and its developable area to ascertain whether delivery is realistic.

1.4 Previous landscape evidence was prepared for the Council by Kirkham Landscape Planning, the Landscaper and Visual Review of Chipping Norton Strategic Site Option (May 2014, Examination Document Ref LAN2). This concludes an indicative housing capacity for the land south of London Road of 500 dwellings within a similar area as now proposed by the Council.

1.5 This is significantly lower than the 1,200 dwellings now assumed by the Council and draws into question the deliverability of this number of dwellings.

1.6 Furthermore, it is noted that the East Chipping Norton SDA now also includes the provision of a link road through the allotment garden land.

1.7 The updated Infrastructure Delivery Plan 2016 does not provide a cost estimate for the provision of the link road. It is unclear what has been assumed for viability purposes.

1.8 Edgars Limited understand that the allotment land is under the ownership of Chipping Norton Town Council who object to the provision of the link road. This draws into question the deliverability of the eastern link road which is now integral to the modified East Chipping Norton allocation.

1.9 In Edgars opinion, the increased allocation at East Chipping Norton is not justified by the published evidence and there is a significant risk that it will not be realised.

1.10 Empire Homes Limited object to Policies H1 (MM24), H2 (MM29 and MM30), CN1 (MM140)
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<tbody>
<tr>
<td>MM728</td>
<td>Abbey Developments and David Wilson Homes Southern</td>
<td>-</td>
<td>-</td>
<td>1672</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>Tank Farm</td>
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<td>and CN2 (MM143) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and contend that Land north of the A44 and south of the Banbury Road, Chipping Norton should be allocated to assist with the delivery of the East Chipping Norton SDA.</td>
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<tr>
<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>-</td>
<td>Cala Homes (Chiltern)</td>
<td>1734</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>CALA supports the proposed modifications to Policy CN1.</td>
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<td></td>
<td>CALA fully supports the increase in houses allocated to the east of Chipping Norton as set out in Policy CN1.</td>
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<td>CALA in previous representations sought a comprehensive development of the SDA. It therefore supports the proposed changes set out at paragraph CN1 – i) to require the comprehensive development of the whole of the SDA to be led by an agreed masterplan. Supporting commentary in paragraph 9.4.45 confirms that this approach will allow for applications to come forward for parts of the site in the shorter-term without prejudicing delivery of a bigger, comprehensive scheme. CALA Homes (Chiltern) agrees with this approach.</td>
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<td>Through this approach it is important to set out a mechanism to secure delivery and funding of key infrastructure (the link road, open space and education facilities). The local planning authority will need to use its powers through the planning application stage to ensure comprehensive delivery.</td>
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<td>It is noted at Appendix 2, that delivery of housing to the east of Chipping Norton is expected</td>
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between 2017 and 2031. CALA is working collaboratively with the County Council, other landowners and key stakeholders to ensure timely delivery of the site. There is currently a planning application in for circa 100 dwellings on land to the north of London Road. This timescale is therefore achievable and realistic.

As set out in representations prepared for the Council’s Pre-Submission Plan in May 2015 the plan accompanying Policy CN1 (Figure 9.12) contains a substantial area of landscape buffering (‘Environmental enhancements including landscape mitigation’, shaded green) to the southern side of the site. It is clear from the Landscape Mitigation Report prepared by Lockhart Garrett (May 2015) that accompanied the May 2015 representations, that such an expansive area is entirely unnecessary and unjustified and should be reduced. It is acknowledged that this part of the site has a higher degree of landscape sensitivity but that the detailed design work for the site will be best placed to more accurately identify the extent of mitigation required. It is a significant concern that the inclusion of such a buffer on the plan will prejudice the proper, comprehensive and effective masterplanning of the site.

Paragraph 9.4.44 sets out that at this stage, the extent of the developable area shown is only indicative. This will in turn be informed as part of the comprehensive master plan which will be prepared for the site (criterion a1) set out in Policy CN1). The green shading shown on the proposed allocation map (Figure 9.12) should be deleted.

The proposed site would remove allotments and community woodland from the use of the town’s residents, thus failing the requirement to be a positive addition to the town. It will also significantly add to the air quality problems and congestion in the town - as previously highlighted. In short, the development is too large to avoid an adverse impact on the town, the Cotswolds AONB and the Rollright Stones Dark Skies Discovery site.

An increased housing allocation to the East of Chipping Norton is supported as it would enable a link road to the east of the town to be delivered. This would not only accommodate development traffic but also help alleviate some traffic going through the centre of Chipping Norton and improve the overall air quality in the Air Quality Management Area within the town. Other schemes (transport and non-transport) will need to be further explored in order to improve air quality in Chipping Norton.

In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.
The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

East of Chipping Norton

Glyme Valley SSSI lies nearby to the south east of the site. The long-term management and therefore condition of the SSSI may be affected by increased recreational use generated by the development. If development takes place careful consideration of green infrastructure provision – in terms of extent, type and location is required to ensure that off-site recreational impacts are minimised. There are a number of local habitat enhancement initiatives – e.g. agri-environment schemes that are established in the area. There may be opportunities for biodiversity enhancement within the adjacent Glyme and Dorn Valley Conservation Target Area for which it would be appropriate to seek funding from the development.

The eastern edge of the development / perimeter road will be prominent in the local landscape and proposed perimeter road has the potential to fragment the habitats in this area and adversely affect landscape character. These potential impacts should be considered at the master-planning stage.

William Fowler community woodland, to the east of the allotments, should be highlighted on the context map.

The footpath and cycle links to the main body of the town to the west would need careful consideration to ensure that the new development, should it proceed, does not become functionally isolated from the rest of the community.

ECOLOGY AND NATURAL ENVIRONMENT

In all cases reference should be made to the District Council's ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

West of Eynsham

This includes an area of best and most valuable category agricultural land.

The Chilbrook catchment runs through the proposed site with potential downstream impacts in terms of water quality and flooding. If development proceeds there may be opportunities to include natural flood management infrastructure and enhance biodiversity around the watercourses.
Eynsham Fish Ponds lies to the immediate east of the site and the Wodoland Trusts Eynsham Community Wood to the north. Additional funding will be required to improve the resilience of these sites to deal with the increase in recreational pressure.

There is no indication of the location of landscape enhancement areas on the context map.

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| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs | 2217 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | Appendix 2 – Education Comments
Policy CN1 includes a 2.22ha site for a new primary school. This is appropriate as 1400 new homes would be broadly in line with a new 2 form entry primary school being provided within the site. |
| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs | 2254 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | Policy CN1 bullet point D
We suggest the following changes to ensure this policy is in line with LTP4. Suggested text to update point ‘d’:
provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians, and cyclists with links to adjoining areas, and key destinations. Provision of individual Travel Plan (and associated Travel Information Packs) for the residential and employment areas, as well as the school. |
| MM85          | Private individual and Town Councillor | Mike and Moni Tysoe | Mr and Mrs | Tysoe | 229 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | General comments written as Councillor and as a private individual.
General comments.
Chipping Norton is one of the highest towns in West Oxon and is built mainly on hills with narrow streets except for the main roads of A44 and A361 - in places the underground infrastructure (overflowing sewers/rainwater drainage - shared system) is already creaking with too much use and the road problems we have are well documented and accepted as being unfit for purpose by OCC/WODC with a serious air quality problem in the centre of town. It might also be worth mentioning here that when an OCC employee was recently asked "how many of West Oxon...
main A roads are fit for the very large HGV’s we see nowadays? The answer was ‘none of them’!

CHIPPING NORTON NEIGHBOURHOOD PLAN - on 3rd March 2016 a referendum was held in the town accepting the CNNP which was then adopted. In this plan it was mentioned in several places that any future development has to be sustainable and it is felt that whilst 600 homes on Tank Farm were possibly sustainable 1400 homes are not - please see notes 2/3/4/5/6 below. It is felt that WODC in their draft Local Plan entirely ignoring the spirit of the CNNP.

In February 2014 the Town accepted that it would have to take some new houses and reluctantly agreed that 600 on the area known as Tank Farm (the south half of the SDA) could be acceptable subject to suitable planning and mix of houses and infrastructure.

Little contact has been made since then except for a plan that was attached to a planning application in the nearby area in the middle of 2015. Nothing officially has been given since the meeting on 14th February 2014 until 23rd August 2016 when in a meeting between CNTC and OCC a plan using 800 homes plus 80 extra care beds was tabled and alterations suggested including no access at the southerly perimeter.

The next contact was the recent suggestion of 1400 houses. Considering that the allotment land to the south of the SDA is owned by the Town it seems strange that discussion about the possible purchase of any land requirement has not yet happened - for sake of absolute clarity the William Fowler Allotment land is not for sale.

We also get the impression that some pressure might have been brought to bear on local land owners to go along with OCC plans - and please bear in mind that the majority of the land we are discussing is owned by OCC - thank goodness there are some ‘ransom sites’ to protect the town from being totally overrun and spoilt.

We also feel that discussions with other stakeholders have not taken place - we back this statement up with the recent planning application at the Pillars which is adjacent to the northern edge of the SDA with no vehicular access which apparently shows no coherent masterplan.

Chipping Norton Town Council totally reject the new local plan for the SDA for the following reasons in brief -

* 1400 new homes on Tank Farm are not sustainable
* The local employment of residents has fallen over the last 10 years and is now below 30%
* The majority of local employment tends to be ‘low paid’ jobs in retail/catering and caring sectors
* ‘High paid’ jobs i.e. professional or technical jobs tend to be in what is now-called the ‘knowledge spine’ which is difficult to access from Chipping Norton unless you drive as we have a poor train and bus service
* Narrow and congested roads (including the main A44/A361 at Horsefair where the worst pollution in Oxfordshire has been ignored for many years by OCC and WODC. The best long term solution to Horsefair are the road improvements needed around the Rollright Stones, which have been discarded due to cost - now budgeted at £18 million by OCC’s consultants
* The cost of the Eastern Relief road has not yet been tabled but has to be close to the figures in 5
* The traffic figures being used from the survey carried out by WYG are erroneous - two points immediately stand out - a) it is stated that there have been no traffic related accidents in Horsefair in the last 5 years - we know that there have been 3 DEATHS in the period and b) it is stated that
the busiest time of the day on Burford Road (A361) at Chipping Norton School (a large comprehensive 1200 pupils) is between 0700 and 0800, but in reality this is really 0815 to 0845. * We dispute the figures given to us by OCC and others which show that only 30 % of the HGV's that transit through Horsefair use the A361 towards Burford and a massive 70% use the A44 east and west towards Oxford/Morton-in-Mars / Evesham and the A361 north to Banbury. We have been advised by independent traffic consultants that the figures are probably nearer to 15% respectively 85%. We therefore consider the Eastern Relief Road to be ill-advised * An independent expert has recently been shown our traffic problem and has walked around the town and agrees with the Town Council that a one way system using Albion Street and the High Street would go a long way to deter HGV's / improve the air quality / ease congestion and add few badly needed parking spaces. This could be achieved comparatively quickly and at a much lower cost than building either road. * Parking according to WODC's figures this town is on average at 110% capacity when it comes to public carparks and on-street parking. A second storey on New Street car park would help alleviate the problem but would not completely resolve the problem.

Chipping Norton currently has around 3000 homes. Adding a further 1400 homes (on top of any development currently going through) will increase the size of the town by 50%. The existing services and roads will not cope with this level of increase. This is a small market town, the roads of which were not built to cope with the current volume of traffic, without increasing this by 50%. The junctions of Albion Street, London Road, Banbury Road, Over Norton Road are already very busy at peak times, with Horsefair showing illegal levels of pollution. The volume of HGV and cars along the A44 (the site of the proposed development) - as shown by the WYG Chipping Norton Transport Options document, A096781, points 2.1.3 and 3.2.1 which stress the need to address concerning existing air quality issues within the town centre, particularly along the A44/High Street/Horse Fair corridor that has been declared an Air Quality Management Area. A link road from Banbury Road to Burford Road will not mitigate the current traffic levels, or an extra 50% increase of car traffic as most traffic does not travel via the Burford Road. Point 3.2.5 of the WYG report stresses that findings indicate that diesel cars emit at least as much NOX as buses and HGVs so an increase of cars by 50% will raise pollution levels even further to a dangerous level. Chipping Norton also has 100% employment at present so new residents of these 1400 homes will have to travel to work if they don't already work in Chipping Norton, increasing pollution and traffic levels further for the town and surrounding areas. Added to this sewerage in the town is already problematic with the current levels of housing, due to age. It is unlikely to cope with a 50% increase in housing. Fire services are being reduced, the Ambulance station was closed some years ago, the newly built community hospital has been downgraded and the NHS proposes closing the A&E at the Horton hospital. These infrastructure issues and service reductions pose a significant risk to public safety if housing levels were to increase by 50%.

The CPRE Oxfordshire report of 15 November 2016 supports these points:

‘In the original draft Local Plan, 5,500 new households were planned over the period to 2029 (306 per annum over 18 years). A higher figure of 6,700, based on economic growth forecasts, was ruled out on the basis that it would put infrastructure under pressure, with potential negative sustainability impact. Now, just two years on, we are facing a proposed target of 15,950 houses by 2031 - an average of nearly 800 per annum.

This is completely beyond what has ever been achieved in the past and is not realistically
The proposed plans for Tank Farm are not legally compliant and are unsustainable as they are set out. The increase of homes from the original 600 to 1400 has not been thought through or planned out fully. The issues include, but are not limited to the drainage of the site, the antiquated sewerage system of Chipping Norton, the lack of professional work available in the area and the lack of a fully functional Hospital and medical care.

Drainage from the Tank Farm site - where will it be directed? This area is already prone to flooding at times of heavy rain.

The sewerage system - this is already failing to cope with the town's population especially at times of heavy rain/flooding. Raw sewerage has been forced back up into the West End area of the town during these events.

The proposed plans take away green and leisure space from the community and also negatively impact the wildlife of the area.

The proposed plans will also create a commuter network from Chipping Norton as new residents travel to Oxford, Abingdon and Didcot for the professional jobs they desire. This will create extra burden on the local country road system, leading to extra congestion at bottlenecks and through the town itself. The local transport system is woefully underfunded to cope and the lack of a train station is limiting also.

The plan is not justified as appropriate for Tank Farm as there are other options available, especially if the proposed number of homes is spread around the town and surrounding villages. The plan is not effective in its deliverability over the time period specified, the workforce necessary to build this site is not available/sufficient to build this many homes per year - the number of building companies in Oxfordshire (and also nationally) is not sufficient.

The plan is also not consistent with National Policy, Chipping Norton and Tank Farm in particular are taking an unfair proportion of the overall amount of homes for this area.

Chipping Norton currently has around 3000 homes. Adding a further 1400 homes (on top of any development currently going through) will increase the size of the town by 50%. The existing services and roads will not cope with this level of increase. This is a small market town, the roads of which were not built to cope with the current volume of traffic, without increasing this by 50%. The junctions of Albion Street, London Road, Banbury Road. Over Norton Road are already very busy at peak times, with Horsefair showing illegal levels of pollution. The volume of HGV and cars along the A44 (the site of the proposed development) - as shown by the WYG Chipping Norton Transport Options document, A096781, points 2.1.3 and 3.2.1 which stress the need to address concerning existing air quality issues within the town centre, particularly along the A44/High Street/Horse Fair corridor that has been declared an Air Quality Management Area. A link road from Banbury Road to Burford Road will not mitigate the current traffic levels, or an extra 50% increase of car traffic as most traffic does not travel via the Burford Road. Point 3.2.5 of the WYG report stresses that findings indicate that diesel cars emit at least as much NOX as buses and HGVs so an increase of cars by 50% will raise pollution levels even further to a dangerous level.

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- This is completely beyond what has ever been achieved in the past and is not realistically achievable.

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| MM147 | David Whetstone Mr Whetstone 328 | 1,400 on the Tank Farm area to the east of town would not be a "sustainable integrated community . . . forming a positive addition to the town". It would:
- be a massive housing estate on the edge of Chipping Norton;
- completely overload existing infrastructure;
- increase the provision of housing in an area of the country that should not be expanded. UK PLC needs to invest and encourage investment away from the South East. |
| MM154 | Caroline Brooks - - 336 | I am concerned at the volume of traffic currently going through the town, in particular HGVs, for which the roads are quite unsuited and have already resulted in one recent fatality. This problem would intensify with increased housing unless a by-pass was built. Are there any plans for this?
Do we have the educational facilities to cope with this proposed increase? Will we need more Primary Schools? Will the increased housing be for Chipping Norton’s benefit or will it merely become a dormitory town for Oxford? |
| MM231 | Jane G Dr Griffiths 437 | I am writing to object to the major revision to the Draft Local Plan that proposes the building of 2400 new houses in Chipping Norton by 2031, and specifically about the proposal to build 1400 of them on and adjacent to land at Tank Farm. References in brackets are to the Schedule of Proposed Modifications to the Draft Local Plan, as published on the WODC website.

The figures

- My first objection is that the addition of such a large number of houses will drastically alter the character of the town. The most recent census shows that the population of Chipping Norton was 6337 in 2011. One of the WODC representatives at the consultation in the Town Hall on 23 November said that an average occupancy of 2.4 occupants per new house had been assumed, but that the true figure was likely to be substantially higher. This means that, on the most conservative calculation, the population of the town will increase by 5760; even assuming that the current population may now be nearer 7000 than 6330, that is bower 80%, with the Tank Farm development alone causing an increase of over 50%. |

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Even in the most general terms, the addition of a vast estate to one side of the town, with an attendant population increase on this scale, will clearly change the character of the town almost out of recognition. More specifically, the proposed new houses will turn Chipping Norton from a vibrant working town into a dormitory town. The Draft Local Plan states specifically that the increase in the total number of proposed new houses to 2400 is in order to meet the unmet housing needs of Oxford (see changed text at MAIN15, 4.17 and again in the margin at MAIN24). This clearly implies that the vast majority of the new residents will be commuters. The Plan mentions provision of ‘9 hectares’ of business land as part of the Tank Farm development, but does not indicate how many potential new jobs this might create; it seems highly improbable that there will be enough to compensate for such a large population increase, of whom at least half to two-thirds are likely to be working adults.

No consideration of infrastructure

My second objection relates to the lack of thought that has been given to the kind of infrastructure that is required for this scale of development. The Draft Plan discusses local needs (MAIN59), and makes much of the proposed new road that would link the London Road with the Burford Road. While it is possible that this would go some way towards alleviating the problem of additional traffic through the town centre that the new housing would cause, it will do nothing for the town’s connections to other centres, such as Witney, Banbury, and – especially – Oxford. Since, according to the Draft Local Plan’s own rationale, the majority of the new residents will inevitably be commuters, the new houses will place particular pressure on the A44. This is a country road, not a commuting road, and at peak periods it is already very difficult indeed to get to and from either Oxford itself or one of its Park & Rides. The Draft Plan discusses the A40 at some length (MAIN60), but mentions the A44 only once, as an adjunct to the A40 (MAIN60, 7.28). No positive strategy is offered here; it is stated merely that ‘where appropriate, we will seek contributions from new development towards solutions to the A40 and also the A44 congestion problem’, indicating that any solutions that are found will be purely retroactive. It is extraordinary that development on such a large scale, aimed to a great extent at commuters, should be proposed without any thought having been given to how the road would cope, how it might be improved, or what alternatives might be put in place.

A secondary concern here is that the way in which the proposed new link road is described is obfuscatory. Section MAIN62 acknowledges that one of the main traffic problems in Chipping Norton is the high volume of HGV traffic that passes through on the way to Evesham, and then implies that the new road might partially alleviate it – but a link between the London Road and the Burford Road will have no effect on Evesham traffic, which will continue to pass through the town centre on the A44. At the very least, the wording of this section should acknowledge that.

Another instance of misleading phrasing is found at MAIN66 (7.58). This is where it is cursorily acknowledged that none of the three main towns earmarked for development is directly served by rail; the bus link from Chipping Norton to Kingham is mentioned as a mitigating factor. There is no mention, however, of the fact that this is one of the services (the X8) from which funding was recently withdrawn; it is now running a reduced service, and its existence is under threat. It is therefore not sound to rely on it as part of the future infrastructure.

Proposed development contravenes the Neighbourhood Plan
The proposed development and ensuing population increase are not in accordance with the overarching vision of the Neighbourhood Plan, which is of Chipping Norton as: ‘A working Cotswold town thriving economically and socially as a rural hub while maintaining its strong sense of community spirit and conserving and enhancing its character, high-quality historic built and natural environments, local services and facilities.’

The Plan specifically states that the fact that the town’s residents have: ‘a strong desire to retain its unique character was key to agreeing the overarching vision of the Plan from which its objectives and policies have been derived', and that these objectives and policies were established in consultation with WODC.

The WODC website itself states that: 'The Chipping Norton Neighbourhood Plan [http://www.westoxon.gov.uk/media/1381350/Chipping-Norton-Neighbourhood-Plan-2015-2031.pdf] was formally made part of West Oxfordshire District Council's development plan on 15 March 2016, following the positive outcome of the referendum, where over 90% of those who voted were in favour of the plan.'

Now, only seven months later, that plan is being flagrantly disregarded.

Proposed development contravenes the Draft Local Plan’s own principles

The proposed development also contravenes several of the Draft Plan’s own principles, in particular that all development should:

* ‘Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality’ (MAIN16)

* ‘Be supported by all necessary infrastructure’ (MAIN16)

* ‘Form a logical complement to the existing scale and pattern of development and/or the character of the area’ (MAIN16)

* ‘minimise the need to travel’ (MAIN17; cf. also Policy T1)

It also contravenes the assurance given in the Draft Plan that: ‘The Council will continue to work with communities to promote and enhance the attractiveness of all town centres addressing, where possible, issues of publicity, security, parking and accessibility, and improvements to the public realm. Enhancing the character and improving the environment of town centres is an important part of strengthening their role. The older town centres in West Oxfordshire have distinct and historic characters, strongly influenced by Cotswold building designs and materials, and by their roles as market towns. The conservation, enjoyment and enhancement of their historic environment is a significant consideration.’ (MAIN56, 6.84)

Summary

The Draft Local Plan and the proposed development at Tank Farm are not sound because, in contravention of several of the Local Plan’s own principles as well as the Chipping Norton Neighbourhood Plan, they will significantly alter the character of the town and are inadequately supported by the proposed infrastructure.
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| MM242         |                         | Jon Fletcher   | -                | Fletcher          | 448        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | The dramatic proposed increase in the number of planned houses East of Chipping Norton is more than twice that which was originally proposed, not taking into account other existing and planned developments in the town. It is not in-line with the current or proposed infrastructure of Chipping Norton, and will have a negative effect on the local environment (including increased pollution) and the town’s existing population. Chipping Norton town centre already has high levels of air pollution. Facilities and services in the town have already been reduced and continue to be under threat. The additional proposed housing will increase the pressure. 

The need for housing is generated by a lack of available housing in Oxford but the commute to Oxford is not sustainable for the majority by distance and the limited public transport available from Chipping Norton. 

Employment opportunities within the town are already limited, and the proposed plan does little practically to improve this, other than allocating some land for employment. Historically this does not guarantee employment opportunities for the town, allocated employment land at the Parker Circus housing development is still unused and undeveloped, the separate proposed plan for development of this land is in fact a mixture of commercial and residential properties. 

The proposed A361 link road does little to address the heavy HGV traffic using the A44 road through the town centre. The increase in traffic due to the increase in population from the proposed development would actually increase traffic through the town centre. 

One large development of housing is not sympathetic to the natural development of the town or for the future integration of it’s inhabitants with the existing population. 

The ownership of the land (OCC) may be creating a biased influence on the revised proposals of the plan. |
| MM244         |                         | Jonathan Powell| Mr               | Powell            | 450        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | See attached response form |
| MM255         |                         | Kate Ward      | -                | Ward              | 465        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | Chipping Norton Draft Local Plan 

I wish to register my strong objection to the proposal to build 2400 new houses in Chipping Norton by 2031 and particularly to the proposal to build 1400 of them in one vast estate on and adjacent to Tank Farm. This proposal seems to be at the expense of Chipping Norton and takes no account of the impact on the town itself and the inadequacy of the local infrastructure, communication and transportation links in the absence of sufficient local employment opportunities. The proposals flagrantly disregard the Chipping Norton Neighbourhood Plan which was made part of WODC’s development plan. 

This amount of new housing could double the population of Chipping Norton; this would alter the |
nature and character of this currently thriving market town, forcing it to become a dormitory town. Your representative at a town meeting earlier this month confirmed that this would be the case since there are no plans first to create significant employment opportunities in the area even though 9 hectares have been designated ‘business land’. Recent history has shown that, whilst the need for employment has been recognised, plans for the development of job creating businesses have come to nought. I believe that, prior to the construction of any residential estates, proper plans should be drawn up, commitments made and action taken to create a range of employment opportunities for residents.

The proposed new ‘link road’, routed through the new estate, joining the London Road and the Burford Road, will do nothing to address the continuing problem of heavy traffic on the A44, including ever-larger HGVs, currently routed through the town centre; it is deceitful to suggest that this would address current traffic problems.

Furthermore I object to these proposals on the grounds that they contravene the principles of the Draft Local Plan which state clearly that all development should be of a proportionate and appropriate scale to its context, should form a logical complement to the existing scale and pattern of development and/or the character of the area, and minimise the need to travel.

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| MM261         |                         | Linda and Clive | Mrs              | Rand              | 474        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | Principle of East Chipping Norton SDA

We consider that the land east of Chipping Norton is the only acceptable direction of growth for the town and so we support the principle of expansion here. The wording of the policy itself (not just the supporting text) should be tightened to

* require that a comprehensive master plan for the whole SDA allocation be prepared, with full public involvement.
* that must include the Eastern Distributor Road from Banbury Road to Burford Road
* prior to the submission of an application for outline consent.

The reason is in order to prevent cherry picking, which has already started with two applications for residential and one for retail development, to ensure that the EDR is delivered by the development and to ensure that all development within the SDA contributes on an equitable basis towards infrastructure costs.

Amount of development

The threshold for the justification of the EDR is not clear. OCC’s Traffic Study by WYG examined three scenarios but jumped from an 850 home option to a 1,500 home option. There must be an intermediary level at which the road is viable and justifiable.

Further, it is not clear what proportion of the additional 800 homes is intended to cater for Oxford’s unmet need; there appears to be insufficient rationale other than expediency. Catering for Oxford’s unmet need will involve an increase in journeys to and from Oxford and the ability of people living in Chipping Norton to access jobs and services in Oxford is far from easy. Chipping Norton is an unsustainable location in terms of access to centres of employment and services, particularly Oxford. It is not the right place for homes to cater for Oxford’s unmet need. For example

* Sustainable transport: Whilst a superficial glance indicates that bus services exist to Stratford,
Banbury, Oxford, Witney and the rail station at Kingham, in reality these services are far from comprehensive. The journey to Oxford takes about 60 minutes, whether by bus or private car, with frequently severe delays at the approach to Oxford, and generating traffic through villages en route. Bus services to other towns are day-time only. The X8 bus link from town to the rail station is under threat and has already been run down with no evening or weekend service. The train journey from Kingham has an irregular timetable, with significant gaps during the mid afternoon period. The 2011 Census reveals, as a result, that only 4% of Chipping Norton residents use public transport to get to work whilst 61% of residents are reliant upon the private car for their journey to work. Development in Chipping Norton that aims to cater for Oxford's unmet need would exacerbate out commuting and increase journeys by private car.

* Access to Services: Services are increasingly being concentrated in Oxford. For example, with respect to hospital care: the removal of maternity and NHS beds from Chipping Norton Community Hospital; the running down of Consultant-led Maternity, Special Care Baby Unit, the 24/7 Children’s Ward, 36 stroke and adult medical beds and 10 trauma beds, A&E, orthopaedics and Critical Care Unit at the Horton Hospital, Banbury. This results in patients needing to take lengthy journeys to Oxford, where hospitals are already under pressure, access by private car difficult, and have grossly inadequate parking. This poses a potential threat to patients’ safety.

* Town’s infrastructure: Whilst the policy seeks new infrastructure to meet the need generated by the additional development, the capacity of the town centre is highly constrained and it could not cater for the demands placed on it by an increase in population of 50%. This is evidenced by, for example, the recent approval of an out of centre ALDI store, because no town centre site was available; the fact that town centre car parks are full by 9am and there is very little scope for their expansion; the fact that WODC officers recently recommended refusal of office development in the grounds of an existing town centre office building because, inter alia, there was insufficient capacity in town centre car parks to cater for the office workers.

We therefore consider that catering for Oxford’s unmet need will cause an increase in unsustainable out-commuting, increasing the community by 50% will overstretch the town’s infrastructure and so we consider that the allocation at East Chipping Norton SDA should be reduced in size to that which meets local needs only and which justifies the construction of the EDR.

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<td>MM268</td>
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<td>Marcus Colchester</td>
<td>Dr</td>
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<td>I am a professional community development consultant with expertise in land tenure and sustainable development. I have consulted ALL the major documents on the WODC website about the modified local development plan. The proposal for an expanded Strategic Development Area in Chipping Norton has serious logical and planning inconsistencies, including the following: 1. Housing need: The expanded plan responds to housing needs in Oxford City not in Chipping Norton. It will thus exacerbate, not resolve, West Oxfordshire’s already high rates of out-commuting and over-reliance on private cars. Since 1976, Chipping Norton’s housing units have expanded at a rate of about 29 units per year, already outstripping growth in local employment opportunities. The proposed development would increase the rate of housing expansion to 160 units per year, placing critical burdens on transportation, traffic flow and infrastructures and is entirely contrary to WODC’s sustainable development policy (and see below). 2. Employment opportunity: Since 2001, local employment rates in Chipping Norton have declined from 50% to 36%, while the quality of local employment has also declined. The proposed expansion plan will rapidly worsen these trends. The provision of 9 ha. of land for employment generation is...</td>
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welcome but, even if these options are developed (details of the number of new jobs expected are lacking in eg 6.24) they will only accommodate a part of existing local employment demands and not those of the proposed expanded population.

3. Affordable Homes: It is claimed that 40% of the new housing in the Tank Farm area will be ‘affordable’. However the current trends show that even small flats and lower cost housing in the Chipping Norton area are not affordable to young residents and newly married couples, who are being forced to out-migrate to Banbury and Evesham Vale.

4. Transport: Chipping Norton lacks a railway station, while bus links to Oxford and Banbury are infrequent and slow. The expansion plan makes no clear provisions for improved public transport and seems to assume increased reliance on road transport. The plans make no mention of improved cycling access and safety.

5. Traffic congestion: Chipping Norton already experiences serious traffic congestion, especially during peak hours. The planned expansion of Chipping Norton as a dormitory town for out-commuters, without a linked sustainable transportation plan, will undoubtedly worsen this situation. Indeed the town already suffers from being a transit route for HGVs, most going along the east-west axis. The provision of the link road on a north-south axis, while facilitating access and commuting to and from the Tank Farm area, will not appreciably lessen the HGV problem.

6. Pollution: Chipping Norton already suffers unacceptable air pollution which exceeds statutory levels, while West Oxfordshire as a whole already has a higher carbon footprint than the national average largely owing to an over-reliance on private cars and service vehicles. No measures are proposed to address the existing problem, yet the expansion plan is likely to increase the number of local cars and service vehicles by as much as 50% creating a toxic environment that will be deleterious to residents’ health. This too seems inconsistent with WODC’s expressed commitment to sustainable development.

7. Road safety: West Oxfordshire already has above average road deaths compared to the national average. The current plan, with its reliance on road cars for out-commuting, will inevitably exacerbate this serious problem.

8. Other infrastructure: Chipping Norton’s fire service is currently overstretched. The sewage system is also critically overloaded. Details of how the expansion plan will deal with these deficiencies are lacking.

I believe the Local Plan to be unsound in relation to the increase in housing numbers (main 24), and specifically the increase on the Tank Site Farm site from 600 to 1400 (Main 27).

Firstly, the infrastructure in Chipping Norton is already struggling to meet the demands of the current population and cannot sustain the extra numbers suggested in the modifications. In particular the sewers are already unable to cope, posing a health risk which would only worsen if the development were to go ahead as planned. Local amenities are also not currently set up to cope with any increase, the fire station only has one fire engine and the community hospital has also been recently downgraded.

The local roads would undoubtedly suffer with the addition of more traffic on the town’s roads. Currently the main roads through town have congestion problems due to small junctions and
I wish to record my views/objections to the proposed plan for 1400 homes etc on the Tank Farm site at Chipping Norton.

1) The number of homes and other units proposed in this one block is too large for the town and will overwhelm the towns services. It will also encroach attractive and productive farmland.

2) The proposed plans would require purchase of part of New Chalford Farm and demolition of young woodland that is, and will be, an important carbon sink and wildlife habitat for the area.

3) The proposed large link road would be and expensive white elephant. It will not sufficiently reduce the HGV traffic (30% or less) through the centre of Chipping Norton, which will remain dangerous and seriously polluted. It is clearly unwise to propose polluting vehicles and dangerous HGVs travelling though dense domestic dwelling space. The proposed road would also take up valuable space for houses or open space with insufficient gain for the town. Money set aside for
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| MM294        |                         | Neil Fisher     | Dr Fisher        | 509        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | such a road would be much better spent elsewhere.  
4) There are other more suitable areas around Chipping Norton that can make up any district shortfall in housing from reducing the size of the Tank farm development, with less deleterious impact.  
As a health centre, we recognise and support in principle the need for new housing within the East Chipping Norton Strategic Development Area and the surrounding area to meet the needs of the population; we are prepared to work collaboratively with WODC and OCC to ensure the provision of high quality Primary Healthcare that meets the needs of the 1,400 new homes proposed as well as any new homes in surrounding towns and villages who choose to register with us, whilst not to the detriment of our existing 15,000 patients.  
Due to a number of complex factors, including funding pressures, recruitment difficulties, ageing population and increasing patient demand, the model for providing primary healthcare nationally is rapidly evolving in to a far more multidisciplinary service delivery model; added to that is clearly steer from central government that health services should increasingly be moved from secondary to community settings. The implication of this, in a town planning perspective, is that the traditional models for determining what primary healthcare provision may be needed (by square footage) may no longer be reliable.  
We therefore have concerns that no specific provision is currently made within these plans for increasing the capacity of the current health centre in Chipping Norton; under the current plans, the health centre would become land locked, precluding any future expansion / extension that may be needed. Whilst provision was made within the planning of our new health centre for some growth in population and services, based on historic growth figures, this provision will not be adequate to handle such a large increase in our patient population or the current trends in NHS provision.  
We would therefore hope that OCC and WODC pay serious consideration to our previously made proposal that the sliver of land adjacent to the current health centre plot (heading directly north, and currently allocated as residential land and containing 7 housing plots and car parking) be allocated to the health centre to be set aside as a contingency for the inevitable need to expand the current health centre in the coming years.  
We feel, that if this small provision was agreed, then we could provide full support as a health centre to the current plans. We would be very willing to meet with you to discuss this further. |
| MM27         |                         | andrewwildman   | MR Wildman       | 51         | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | One thing not mentioned that will be absolutely key with a development of this size is a plan for increase parking close to the town centre. The proposal mentions that the new development is 'within walking distance of the town'. People rarely walk that far. There is not enough parking for the town centre as it is and more attempts to park in the existing car parks will cause congestion and frustration. New residents would more likely start to drive to out of town retail parks (thereby congesting the access routes). The town needs people to shop locally and if it is to grow and businesses to sustain, new customers will need new parking. If the proposed development does not include some edge of town parking (The existing Tank Farm or the old Parker Knoll sites being the best spots) then this opportunity will be lost forever and the town will suffer.  
The current drains in the town do not cope with the current amount of water run-off. The proposed development is on higher ground and will overload any of the town drainage to a point where it will cause flooding and pipes to burst. It happens already. A plan for this will need considerable |
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MM305 |  | Peter Nuttall | Mr | Nuttall | 526 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | It is very likely that the new development will house people who work in or around Oxford. The road from Chipping Norton to Oxford is beyond capacity and in Enstone in winter is very hazardous. Increasing the amount of traffic on those roads will make travelling through Enstone, Woodstock and into Oxford from the Yarnton roundabout impossible. Comprehensive public transport will be essential if it stands any chance if working.

AW

My background is, I attended what was then Chipping Norton Grammar School, lived in The Leys through my university years and 4 years ago moved to Over Norton.

My career was in engineering. I latterly was head of infrastructure projects at British Nuclear Fuels, Sellafield, where I was responsible for projects in the range £30 – 200million.

I write as a concerned resident and an expert on scoping, managing and delivering infrastructure projects.

I am happy to give any assistance I can to WODC and would be pleased to participate in any oral examination.

Representation

I attended the recent public consultation in the town hall Chipping Norton, where WODC are proposing a major project including 1400 new houses, industrial units, a link road and a new primary school. As I see it the project is only an outline proposal, with not sufficient information to allow any decision to go forward as there are so many outstanding issues.

I sincerely hope that this is a consultation, not merely a communication of a "done deal". As such I provide some comments o the proposal.

The scale of the proposal

I do not have the percentages but 1400 homes + the additional infrastructure projects is an unprecedented increase in the size of a small. Historic market town.

It is also, not market led. 1400 homes, say up the 3000 adult wage earners. Where are the jobs that these people are going to do? Certainly not in Chipping Norton or for at least a 10 mile radius around the town. These will be surely commuters who will add to the chaos on the roads which are already at capacity or over capacity at peak times.

Local services, sewerage etc.

We know that the local sewerage is at capacity as at times of high rainfall it is overloaded and foul and drain water is mixed. There is no place in the plan to see what will be needed to upgrade the capacity of the present system

The proposed link road and traffic through the town
The present proposal will inevitably make this problem worse.

Environmental issues

As long standing as the traffic problem, and of course associated with it is the problem of air pollution. This has become more a headline issue nationally in recent months. The cabinet outside the Crown and Cushion tells us that air pollution in the town is unacceptable yet nothing is done about it. The present proposal with up to 1400 houses, over 2000 additional cars will again make the problem worse.

Parking in the town

Parking in the town is at capacity, particularly on market days and Saturdays.

2000 more cars coming in to Chipping Norton for goods and services. Where are they going to park? An extra level on the New St Park? No mention of this in the plan.

Industrial Units

Again, I strongly feel that industrial units should be demand led. An industrial unit was build years ago on the Parker Knoll site. It is unused, unloved and abandoned.

Overall comments

From experience, many projects fail because they are looked at piecemeal and not holistically. By any measure the propose plan is a major project. At present it is the vaguest sketchy plan. I am frankly surprised and disappointed that the WODC feel they have sufficient information to put this forward as a plan with their approval.

I would have expected that a project of this magnitude be supported by an economic, social and environmental impact statement.

This would lead to viability study. Only then should it go to the Council for approval.

There is no supporting evidence to show that any of this has been done.

At present there is simply not enough information for this to go forward.
In the leaflet circulated at the meeting we were asked to tick one or more of 4 boxes. forward as a proposal.
My informed opinion is that 1400 houses is too much, although we do need more housing.

Consultation on proposed modifications to the submission Draft West Oxfordshire Local Plan (2011 - 2031).

I refer to the email I received from Mr Andrew Thomson dated 11/11/2016 inviting response to the above.

My response, which relates to Chipping Norton, is set out in the attached document.

While writing to you, I need to bring your attention to actions by the Chipping Norton Town Council to subvert the Draft Local Plan and supporting infrastructure by:

* Sponsoring/encouraging random and piecemeal development (on land not designated in the Draft Local Plan) such as 300+ further housing units on AONB land by Archstone as an extension to the existing 200+ housing units currently under construction by Bellway. A planning application supported by the Town Council is to be submitted to “limit” the DLP (Draft Local Plan) proposed development land situated at Tank Farm. Clearly a tactical move.

* Associated with 1 above, the Town Council are to propose a one way traffic system combining the main A44 thoroughfare through the town with Albion Street as an alternative to the proposed vital eastern link road proposed in the DLP. Such a one way system would be totally inappropriate for the volume of traffic (both light vehicles and HGVs) and would not address the issues of traffic in and through the town (which is referred to in the attached document). The proposed link road is a vital part of the infrastructure required to support the major increase in housing being proposed.

Neither point 1 or 2 above has been agreed with the residents/electorate of the Town.

Please note my objection to the forthcoming planning application by Archstone, referred to above.

Yours sincerely,
Richard Collings.
3. Infrastructure required to support the DLP housing proposals.

The number of housing units being proposed:

The number of housing units required is presented as scientific assessment. It is not, it is driven by political imperative and the so called “need” for CN to contribute to meeting the “unmet Oxford city requirement”. As a consequence, the proposed modifications to the DLP for CN have resulted in massive increase in the number of housing units both in absolute and relative terms. The numbers are also in excess of the conclusions of the recent independent study of housing requirement carried out on behalf of WODC.

The excessive number of housing units (particularly the huge increase for Tank Farm from 600 to 1400 units referred to in MAIN 27,136,138) now being proposed will increase the population of the town by around 50% which is far too rapid expansion in the timeframe of the WODC DLP and hence more than the town can sensibly absorb and provide the necessary infrastructure for (see below for comments on impacts on infrastructure). The character of the town will also be irretrievably adversely affected.

CN should not be contributing to the “unmet” Oxford housing requirement, for very obvious reasons relating to traffic congestion on the roads through CN and onwards towards Oxford for employment (which CN cannot provide) and consequent pollution. Housing and employment should go together as can be seen driving down the M5 in Somerset. Here you will see very sensible and truly sustainable development. There is no sense in generating even more traffic congestion and consequent pollution as people travel 20+ miles away from CN. All the major routes just become even more gridlocked. CN will never provide the employment for the level of housing addition being proposed. Page 34 of the DLP document gives insufficient attention to the issue of local job provision ("the balance between local jobs and houses") and much sensible comment from the previous version of the DLP has been deleted no doubt due to political pressure!

For the reasons above, the “unmet” housing requirement for Oxford should be met by building a number of satellite villages around and close to Oxford like the one proposed north of Eynsham. These village developments would be self supporting and hence truly sustainable (as opposed to development proposed for CN which will not be truly sustainable) by having their “own” supporting infrastructure met as part of each village development plan – schools, health services, retail (to avoid unnecessary travelling by road) and good road connections to the main and truly local employment centers in and around Oxford – local housing with easily accessible local employment is the only truly sustainable development.

The consequential impact of the absolute and relative number of these housing units.

Certainly CN does need some new housing, particularly affordable, but not at the excessive levels now being proposed which will have huge impacts on infrastructure which are not properly addressed in the DLP and modifications. The DLP does not properly identify and size the impact of the scale of housing being proposed. This is not rocket science and can be done “per 1000 units”. A few of the impacts are as follows:

* Traffic congestion and consequent pollution in and around CN: This is NOT just about HGV traffic. As stated above building at the scale proposed will generate much more private vehicle congestion
and gridlock in and through the town of CN. The proposed eastern link road is a sound idea but will do nothing for HGV and private cars travelling through the town towards Evesham. CN town already has a severe (and it is measured/monitored) traffic pollution issue. As reported recently by the BBC, we already have the most congested roads in Europe and congestion is costing the UK £13billion per annum. There have also been recent High Court cases regarding dangerous (to health) levels of traffic generated pollution above WHO and EU standards which the UK Government are required to take action to reduce. So on this point alone the DLP is clearly defective.

* Traffic congestion and consequent pollution between CN and main centres of employment: Without local jobs for all the inhabitants of the new housing there will be a huge increase in (unnecessary) commuting. All this consequential unnecessary vehicular traffic impacts the carbon footprint (global warming) which should have a major bearing on the DLP but it clearly does not. Time wasted in traffic queues travelling to places of work for both private cars and commercial traffic is a major reason for UK low productivity.

* Parking provision: There is already insufficient parking provision in CN. This situation will obviously worsen with over 1000 additional homes proposed. Lack of parking provision impacts the business of local retailers in the town, many of which are “independents” and hence contribute to the vibrancy of CN as one of the UK’s leading market towns. The CN Theatre, which is vital to CN, will “die” if patrons cannot park. As a volunteer usher I often have to greet “latecomers” who have been circling the town looking for parking and this is in the evenings!

* GP health services: Although CN is blessed with a modern health centre this does not mean that timely GP appointments can be obtained. It is already extremely busy and under pressure. With over 1000 additional homes proposed, many more GPs will be required or the currently under pressure service will rapidly deteriorate.

There are of course many other infrastructure demands which will need to be addressed on account of such a huge increase in the number of additional homes proposed, such as school places or sewerage infrastructure. This brings me to my next point.

Infrastructure required to support the DLP modified housing proposals:

Any Plan (if it is to be regarded as a competent Plan) has to identify all consequential impacts. These impacts then need to be sized/costed (not rocket science – in my commercial life I have been responsible for much more extensive and challenging business Plans than the DLP) and then have their own individual Plans, which must be funded to deliver the supporting infrastructure in parallel with the main Plan. This is no more than common sense in the real world of commerce. The wording in the DLP (such as Policy OS5 – Supporting Infrastructure) is far too inadequate and hence the DLP and proposed modifications cannot be regarded as a competent Plan. It is clearly defective and unsound, and if this major increase in housing goes ahead without the supporting infrastructure being put in place in parallel, time will then prove and confirm that the DLP, and the current review of modifications to the DLP, was incompetent and unsound. Who will take responsibility for this?

Summary of key points:

* The proposed increase in housing units (MAIN 27,136,138) from 600 to 1400 at Tank Farm is excessive, will increase the population of the town by around 50%, hence too rapid an expansion in the timeframe of the DLP and more than the town can sensibly absorb. Hence the DLP and proposed modifications are unsound.

* CN should not be contributing to the “unmet Oxford city requirement” for reasons of major...
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| MM315        |                         | Richard Gwinn   | -                | Gwinn             | 577        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | increase in traffic congestion, pollution, carbon footprint impact. Jobs in Oxford are too far distant and truly sustainable development is to align local jobs with local housing. Hence this requirement would be best met by a number of satellite villages around but close to Oxford. Hence the DLP and proposed modifications in this respect are defective and unsound. * The DLP is far too weak on supporting infrastructure (eg, Policy OS5) and hence the DLP and proposed modifications are defective and unsound, cannot therefore be considered to be a competent Plan and should not therefore be signed off.  

* His modification increases significantly the number of properties to be built in the Chipping Norton SDA. This is backed up by unsound evidence and is not appropriate to the existing community. In particular:  

  a) Part of the Vision in section 3.2 is to "play a role in helping to meet wider needs, without significant change to the intrinsic character of the District." Increasing the population of the town by 50% will inevitably change its character. Especially as the driver for the increase is the need to house those working in Oxford, so turning a working town into a dormitory town.  

  b) Core Objective CO2 is to "Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire." This fails for the same reasons as the Vision statement.  

  c) Core Objective CO3 is to "Promote safe, vibrant and prosperous town and village centres and resist proposals that would damage their vitality and viability or adversely affect measures to improve those centres." Whilst a modest increase in population will help the town, this huge increase, aimed at commuters into Oxford, will be detrimental. The plan mentions that the proposed development is within walking and cycling distance of the town centre, although it offers no evidence to support this. I visit the town centre most days and have never seen more than one bicycle in the cycle parking there. The area around the town is too hilly for most of the population to cycle. A straw poll of people living in the Parkers Circus estate (which is closer to the town centre than is the SDA) indicates that none walk when going into town to do their shopping. These were all fit, active people. The town centre is also not safe. In the last few years, people have been killed by passing traffic while on the pavement at Horsefair. The proposed link road appears to be a "road to nowhere" as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this relief road. This increase in traffic will also affect air quality, which is already at illegal levels.  

  d) Core Objective CO4 is to "Locate new residential development where it will best help to meet local housing needs and reduce the need to travel." Policy T1 - Sustainable Transport says that "Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton." The increase proposed in the modification is mainly to serve Oxford. There is no train link to Oxford. The bus to Oxford takes over an hour and is infrequent. The bus service from Kingham Station does not wait if a train is delayed, resulting in a possible two-hour wait for the bus that meets the next train. I see no solution to this problem as buses have to keep to timetables. Everyone I know has stopped using this bus, resulting in more car journeys and a station... |
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| MM327        |                         | Christopher and Rosie Herdman-Newton | -                 | Herdman-Newton    | 602        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | The car park that can't cope. The alternative is to travel to the station by driving through country lanes and the village of Churchill in contravention of Policy T1. The increased local traffic will make air quality worse. There is nothing in the proposed plan to solve these problems. 

e) The proposed plan states in para 7.74 that “In Chipping Norton public car parking spaces in the town centre are insufficient to meet current needs.” There is nothing in the proposed plan to solve this problem. |
| MM87         |                         | S Jackman       | Ms                | Jackman           | 610        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | My comments mostly relate to the Environmental and Heritage Assets objectives under 8:2-30, 8:58-88, which my wife and I believe the Proposed Modification plans are completely at odds with. 

HERITAGE: It is inevitable that the addition of such a large number of new houses will increase the population and traffic and pressure on infrastructure and services of Chipping Norton to an unsustainable extent, and lead to the utter destruction of community cohesion. It will compromise the unique and historic character of Chipping Norton as a 'real' Cotswold town for which it is famous. Chippy's uniquely rich heritage as an ancient market town and its vibrant, friendly human community, and its beautiful historic houses and buildings set in such beautiful countryside, is why people love living here and why visitors come to enjoy it from all over the world. 

ENVIRONMENT: Chipping Norton is the hub of an important farming community set within the Cotswolds AONB, where sustainable and enlightened farming practices and Nature conservation and the regeneration of wildlife habitat and biodiversity is recognised by statute to be of prime importance, surely. The proposed modification plans fly in the face of such priorities, seeming rather to serve the interests of developers, planners and landowners who have only their own financial interests at heart, and do not consider the common wealth of the community as a whole. Chipping Norton is in severe danger of being turned into a soulless and inhuman dormitory town where the health and beauty of its natural environment is being gradually eroded. |

Chipping Norton currently has around 3000 homes. Adding a further 1400 homes (on top of any development currently going through) will increase the size of the town by 50%. The existing services and roads will not cope with this level of increase. This is a small market town, the roads of which were not built to cope with the current volume of traffic, without increasing this by 50%. The junctions of Albion Street, London Road, Banbury Road, Over Norton Road are already very busy at peak times, with Horsefair showing illegal levels of pollution. The volume of HGV and cars along the A44 (the site of the proposed development) - as shown by the WYG Chipping Norton Transport Options document, A096781, points 2.1.3 and 3.2.1 which stress the need to address concerning existing air quality issues within the town centre, particularly along the A44/High Street/Horse Fair corridor that has been declared an Air Quality Management Area. A link road from Banbury Road to Burford Road will not mitigate the current traffic levels, or an extra 50% increase of car traffic as most traffic does not travel via the Burford Road. Point 3.2.5 of the WYG report stresses that findings indicate that diesel cars emit at least as much NOX as buses and HGVs so an increase of cars by 50% will raise pollution levels even further to a dangerous level. 

Chipping Norton also has 100% employment at present so new residents of these 1400 homes will have to travel to work if they don't already work in Chipping Norton, increasing pollution and traffic levels further for the town and surrounding areas. 

Added to this sewerage in the town is already problematic with the current levels of housing, due to age. It is unlikely to cope with a 50% increase in housing. Fire services are being reduced, the Ambulance station was closed some years ago, the newly built community hospital has been downgraded and the NHS proposes closing the A&E at the Horton hospital. These infrastructure issues and service reductions pose a significant risk to public safety if housing levels were to increase by 50%. |
The CPRE Oxfordshire report of 15 November 2016 supports these points: 'In the original draft Local Plan, 5,500 new households were planned over the period to 2029 (306 per annum over 18 years). A higher figure of 6,700, based on economic growth forecasts, was ruled out on the basis that it would put infrastructure under pressure, with potential negative sustainability impact. Now, just two years on, we are facing a proposed target of 15,950 houses by 2031 - an average of nearly 800 per annum. This is completely beyond what has ever been achieved in the past and is not realistically achievable.'

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| MM334         | Sarah Kettlewell | -                | Kettlewell        | 618               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | I wish to comment on the proposed erection of 1400 houses on Tank Farm, Chipping Norton.  
* This enormous number of houses, with the necessary extra school, shops, health provision etc. is too overwhelming for a small historic market town such as Chipping Norton.  
* The consequent burden of extra traffic, water, waste and other services would be unacceptable in a town already under pressure in these areas.  
* Since many of the previous work sites (Bliss Mill, Parker Knoll, Penhurst School etc.) were redesignated for housing, where will the people work?  
* A large area of young woodland, essential to provide a carbon sink as well as valuable habitat for wildlife, would be destroyed.  
* The proposed link from Banbury Road to Burford Road might relieve the congested and polluted town centre of about 30% of present HGV traffic. But it would run right through the new residential area with consequential pollution, noise, danger to pedestrians and wasted housing space.  
On the other hand, widening and improvement of the existing road between the A3400 and the A44 would, by extrapolation, filter nearly 70% of the current HGV traffic away from the town centre. Calculations indicate that the cost of this work would be similar to the Burford Road link but without the collateral disadvantages.  
* If the population of Chipping Norton has to be enlarged to this extent (almost doubled), it would be less damaging to spread the developments more widely. A 1400-house estate in one area is not acceptable in this beautiful old town. |
| MM344         | Stephen Bywater | -                | Bywater           | 645               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 140 | I wish to register my disapproval of the current plans to site 1500 new house at Chipping Norton (Tank farm plus other sites)  
There are three main strands to my protest.  
1/ This will double the size of the town fundamentally changing the nature of Chipping Norton making it essentially a dormitory town, there not being enough local industry to support such a population.  
2/ It will inevitably result in a large no of cars leaving the town each day, clogging up the roads of local villages even more than at present and expelling a lot of toxic fumes into the atmosphere. (Hardly green planning)  
3/ There appear to be no plans to improve the infrastructure - Hospital, surgery, schools etc, other
### MM355
**Respondent ID:** MM355
**Respondent Name:** Ms Howe
**Comment ID:** 659
**Comment:**

> than a relief road from the A316 to the A44.

The A316 is not the problem, it is the A44 that carries the majority of heavy goods vehicles through the centre of the town.

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### MM374
**Respondent ID:** MM374
**Respondent Name:** Jeremy Flawn
**Comment ID:** 744
**Comment:**

> The enormous increase from a suggested 600 homes on the Chipping Norton Tank Farm site to up to 1500 seems to me entirely disproportionate and neither soundly thought out nor justified.

1. As the schedule makes clear in several places, much of this housing is to provide for "unmet needs" in Oxford City, despite the fact that Chipping Norton is twenty miles away from Oxford. The implication is, therefore, that many of those who may one day end up living on the Tank Farm site will be commuting into Oxford, adding large amounts of traffic to an already crowded and polluted road system.

2. This being so, it seems illogical to project that an eastern link road will ease the traffic situation in any way whatsoever. The vast majority of traffic in and out of Chipping Norton even now travels on the A44 south to Oxford or north to Evesham, not on the A361 to Burford. The proportion of HGV traffic removed from a polluted town centre by such a proposed road would be minimal.

3. The damage done by building such a road, on the other hand, would be considerable and irreversible. The schedule's authors purport to promote environmental protection, planting of woodland, hedgerows, allotments, etc. with the consequent destruction of a wide range of natural habitats.

4. Increasing the number of houses in a small market town such as Chipping Norton by 50% will also have a deleterious effect on local infrastructure, which already struggles to support the current population. What thought has been put into renewing a sewerage system that fails to cope now when it rains? Where will the doctors, dentists, teachers, etc. who will be required to serve this much larger population base be found?

In conclusion, so large an increase is unsustainable and potentially undeliverable. This is not a plan thought out to meet the needs of the community of Chipping Norton, but to satisfy the number-crunching of those who have to put houses somewhere, anywhere (?) to meet the needs of Oxford City. I urge you to consider the impact on local infrastructure and, perhaps more importantly, the local natural environment, and reduce the size of the Tank Farm project to more sensible and realistic proportions.

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### MM380
**Respondent ID:** MM380
**Respondent Organisation:** BBOWT - Haidrun Breith
**Comment ID:** 791
**Comment:**

> OCC P&F strongly supports the amendments to policy CN1 which provide for an enlarged SDA. OCC P&F is keen to work with the District Council to secure the delivery of this important strategic site. As the major landowner within the SDA, OCC Property & Facilities is working with other landowning parties and promoters to ensure that the site can be delivered as planned.
A Strategic Development Area (SDA) of 1,400 homes is proposed at the eastern edge of Chipping Norton coming close to the Glyme Valley Site of Special Scientific Interest (SSSI). An existing footpath link between the site and this nationally designated site exists and we are concerned that impacts on the SSSI, eg in form of recreational pressure, might not have been fully assessed. The southern part of the SDA also appears to extend into the Glyme & Dorn CTA. Whilst the CTA designation does not preclude development we would expect development to contribute to the aims and objectives of the CTA. We can see no evidence that biodiversity impacts have been considered when making this allocation.

We could also not find any information on whether the potential link road between the B4028 and the A44 has been assessed in ecological terms.

General comments.

Chipping Norton is one of the highest towns in West Oxon and is built mainly on hills with narrow streets except for the main roads of M4 and A36f in places the underground infrastructure (overflowing sewers/rainwater drainage - shared system) is already creaking with too much use and the road problems we have are well documented and accepted as being unfit for purpose by OCC/VODC with a serious air quality problem in the centre of town. It might also be worth mentioning here that when an OCC employee was recently asked 'how many of West Oxfordshires main A roads are fit for the very large HGV's we see nowadays?' The answer was 'none of them!'

CHIPPING NORTON NEIGHBOURHOOD PLAN - on 3rd March 2016 a referendum was held in the town accepting the CNNP which was then adopted. In this plan it was mentioned in several places that any future development has to be sustainable and it is felt that whilst 600 homes on Tank Farm were possibly sustainable 1400 homes are not - please see notes 213141516 below. It is felt that WODC in their draft Local Plan entirely ignoring the spirit of the CNNP.

In February 2014 the Town accepted that it would have to take some new houses and reluctantly agreed that 600 on the area known as Tank Farm (the south half of the SDA) could be acceptable subject to suitable planning and mix of houses and infrastructure.

Little contact has been made since then except for a plan that was attached to a planning application in the nearby area in the middle of 2015. Nothing officially has been given since the meeting on 14th February 2014 until 23rd August 2016 when in a meeting between CNTC and OCC a plan using 800 homes plus 80 extra care beds was tabled and alterations suggested including no access at the southerly perimeter.

The next contact was the recent suggestion of 1400 houses. Considering that the allotment land to the south of the SDA is owned by the Town it seems strange that discussion about the possible of purchase of any land requirement has not yet happened - for sake of absolute clarity the William Fowler Allotment land is not for sale.

We also get the impression that some pressure might have been brought to bear on local land owners to go along with OCC plans - and please bear in mind that the majority of the land we are discussing is owned by OCC - thank goodness there are some 'ransom sites'to protect the town from being totally overrun and spoilt.
We also feel that discussions with other stakeholders have not taken place - we back this statement up with the recent planning application at the Pillars which is adjacent to the northern edge of the SDA with no vehicular access which apparently shows no coherent masterplan. Chipping Norton Town Council totally reject the new local plan for the SDA for the following reasons in brief:

1) 1400 new homes on Tank Farm are not sustainable
2) The local employment of residents has fallen over the last 10 years and is now below 30%
3) The majority of local employment tends to be ‘low paid’ jobs in retail/catering and caring sectors
4) ‘High paid’ jobs i.e. professional or technical jobs tend to be in what is now-called the ‘knowledge spine’ which is difficult to access from Chipping Norton unless you drive as we have a poor train and bus service
5) Narrow and congested roads (including the main A44/A361 at Horsefair where the worst pollution in Oxfordshire has been ignored for many years by OCC and WODC. The best long term solution to Horsefair are the road improvements needed around the Rollright Stones, which have been discarded due to cost - now budgeted at €18 million by OCC’s consultants
6) The cost of the Eastern Relief road has not yet been tabled but has to be close to the figures in 5)
7) The traffic figures being used from the survey carried out by WYG are erroneous - two points immediately stand out - a) it is stated that there have been no traffic related accidents in Horsefair in the last 5 years - we know that there have been 3 DEATHS in the period and b) it is stated that the busiest time of the day on Burford Road (A361) at Chipping Norton School (a large comprehensive 1200 pupils) is between 0700 and 0800, but in reality this is really 0815 to 0845.
8) We dispute the figures given to us by OCC and others which show that only 30 % of the HGV’s that transit through Horsefair use the 4361 towards Burford and a massive 75% use the A44 east and west towards Oxford/Moreton-in-Marsh / Evesham and the 4361 north to Banbury.

We have been advised by independent traffic consultants that the figures are probably nearer to 15% respectively 85%. We therefore consider the Eastern Relief Road to be ill-advised
9) An independent expert has recently been shown our traffic problem and has walked around the town and agrees with the Town Council that a one way system using Albion Street and the High Street would go a long way to deter HGV’s improve the air quality, ease congestion and add few badly needed parking spaces. This could be achieved comparatively quickly and at a much lower cost than building either road.
10) Parking according to WODC’s figures this town is on average at 110% capacity when it comes to public carparks and on-street parking. A second storey on New Street car park would help alleviate the problem but would not completely resolve the problem.
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<td>MM389</td>
<td>D Burgens</td>
<td>Mr Burgens</td>
<td>842</td>
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<td>AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>The Board notes that the allocation for this site has risen from 600 to 1,400 homes. Although the site is outside the AONB a development of this size has the potential to adversely affect the setting of the AONB. The Board supports the inclusion of paragraph o) with relation to the impacts of lighting on the nearby AONB and the Rollright Stones Dark Skies Discovery Site. However we consider that paragraph c) could be strengthened to include reference to the AONB as follows, c) the provision of appropriate landscaping measures to mitigate the potential impact of development on the wider landscape, in particular the Cotswolds AONB to the south of the site:</td>
<td>Revised Local Plan for Chipping Norton I do not agree with the revised local plan. 1500 homes dropped onto Tank Farm is too many. This site is on a hill with the extra water/sewerage produced flowing downhill into the town would put extra strain onto the Victorian sewer system in place where flooding has already taken place. The main traffic flow in north south with large vehicles and lorries causing the traffic problems. A new primary school but no plans to increase junior or secondary school. In fact this plan would build right up to the secondary school boundary leaving only the school playing fields a possible expansion of the school. A school which already has a wide catchment area. There are two council-owned care homes planned plus at least one more private retirement complex. Will the health centre be able to cope? The Horton Hospital in Banbury is under threat with downsizing/closure making more traffic to the J.R. in Oxford. Yes, the town does need some housing. There are a number of sites around the town where smaller developments could be accommodated. Also the outlying villages such as Churchill, Dean, Chadlingham etc. have an elderly population. Their housing will be outside a local’s price range and would therefore be bought by wealthy town dwellers and used as weekend retreats, thus making empty villages during the week and an end to rural villages.</td>
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<td>MM417</td>
<td>Education Funding Agency</td>
<td>Samantha Powell</td>
<td>Ms Powell</td>
<td>925</td>
<td>AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>The approach given to the identification of individual allocations (as set out under the relevant sub-areas within chapter 9) and their associated policies is strongly supported. Where relevant, individual policies require the provision of schools as part of the wider allocated development, including the number and size of schools required (for example Main Modifications 103, 140 and 155). Where the proposed housing numbers do not trigger the need for a new school, the policy requires appropriate provision of or a contribution to the necessary supporting infrastructure (for example Main Modifications 128 and 131). This approach is supported by the EFA. You will have no doubt taken account of the key strategic policies to reiterate this position, including securing developer contributions through s106 and CIL, but it would be helpful if they were explicitly referenced within the document. In particular, as below: The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
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<tr>
<td>MM424</td>
<td>Natural England</td>
<td>Marc Turner</td>
<td>Mr Turner</td>
<td>Turner</td>
<td>940</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>Land to the east of Chipping Norton at Tank Farm SDA. We note that the proposed modification increases the allocation here from 600 to 1400 homes, and also includes an eastern link road. This site is adjacent to the Cotswolds AONB and is also near to Glyme Valley SSSI. Our previous comments still apply; we advise that Landscape and Visual Impact Assessment is needed to ensure that appropriate landscape mitigation can be provided. The potential for impacts on the hydrological regime of the SSSI needs to be investigated, and as previously mentioned the provision of Green Infrastructure will be important in mitigating any negative impacts of increased recreational pressure on the SSSI. Given the increase in housing allocated to this site, we have concerns with regard to the ability of the site to support both the housing and sufficient Green Infrastructure and landscape mitigation measures.</td>
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<td>MM429</td>
<td>Sally Jaffe</td>
<td>Ms Jaffe</td>
<td>Jaffe</td>
<td>974</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>I am writing as a resident of Chipping Norton town to object to the large new developments being recommended at Tank Farm, and several other sites in the town. The objections are listed below: 1) Lack of infrastructure for this scheme 2) Traffic and pollution on a large scale 3) No particular scheme for housing young people. 4) No facilities (playgrounds etc.) 5) Capacity for schooling</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus Dr</td>
<td>Small</td>
<td>996</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 140</td>
<td>Can a scheme be developed for any development to involve the compulsory grant from the developers towards future schemes and, be on going. I hope you will be able to reconsider these points.</td>
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon Mrs</td>
<td>Marshall</td>
<td>1608</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 141</td>
<td>The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive. The building of 1,400 homes at Tank Farm was one of these development options. The report also notes ‘in each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre(paragraph 10.1.2). The study also attempted to ‘identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End’) (paragraph 9.1.3). The report concludes that ‘the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack</td>
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of likely effectiveness and / or unacceptable knock-on impacts' (paragraph 10.6.1).

The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.

The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

Road Safety

Road safety issues in the centre of Chipping Norton are very closely connected with the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close proximity. It has been the site of several fatal accidents in recent years.

Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to ‘address the relatively high rate of fatalities and serious injuries on the District’s road network’ (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.

Traffic

The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:
The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in March and were intended to assess “normal” traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren’t the surveys carried out during these busier times of the week?

In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the town. Why wasn’t the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:

*However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town*
resulting from a combination of redistribution and the increased level of development on the Tank Farm site.

* The report also reports that this option "would be likely to exacerbate air quality management issues" – paragraph 11.1.15.
* The health of residents and people working in the centre of Chipping Norton would be put further at risk – see section CN4 above.
* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1
In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would "operate well in excess of their theoretical capacity" and that the other 3 "would all remain operating within or, worst-case, at capacity for all of the potential development scenarios" – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that "the operational impact of additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate" – paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.

Other traffic related comments

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31.

The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ – paragraph 11.1.18.

However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘..... there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’.

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn't the Transport
Options Study for Chipping Norton conclude that 'delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031' (paragraph 11.1.21)?

The Transport Options Study report also concludes that this option "would be likely to exacerbate air quality management issues" – paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:

* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.

* The town has been experiencing severe air quality issues and the associated detrimental effects on people’s health for at least a decade.

* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.

* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.

* All the time traffic through Chipping Norton increases and these problems get worse.

When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton’s traffic related problems. However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town’s residents and visitors to expect a better solution than this?

Car parking

Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: 'The availability of adequate public parking capacity is a key constraint in Chipping Norton' (paragraph 9.4.30) and 'Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate' (paragraph 9.4.60).

The Local Plan states: 'The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre' (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping.
A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However, given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and especially if doing a large weekly shop.

The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before development is permitted at the ECNSDA the problem of how to provide significant extra car parking capacity in the town centre needs to be resolved and funding secured for this.

School capacity

The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: ‘it is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation’ (paragraph 9.4.48).

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of school age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size. The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people

One of the Core Objectives identified in the Local Plan is: ‘CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel’ (paragraph 3.7).

Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally.

Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton:

‘Chipping Norton will strengthen its role as a centre of enterprise in the northern
part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.’ (paragraph 3.2)

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a relatively short time period must put at risk the special character of the town. Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that ‘the number of people living and working in the town has fallen from 50% to 36% since 2001’ (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes in the ECNSDA it is surely only a matter of time before one of the major supermarkets puts forward plans for a large new store on the outskirts of Chipping Norton.

Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.

There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: ‘Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre’ (paragraph 9.4.61). However there is no explanation of how pressures for ‘out of centre development’ will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA
Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

* Measures to reduce air pollution
* Improvements to road safety in Chipping Norton
* New road
* Other improvements to roads in and around the town
* Extra car parking
* Improving conditions throughout the town and surrounding areas for pedestrians and cyclists, including accessibility to bus and rail services
* New primary school
* Significant expansion of secondary school
* Mitigation measures for the impact on the Conservation Target Area (CTA) and the SSSI

Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask: where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?

If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be

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**MM376**

**Stagecoach in Oxfordshire/Stagecoach West**

Nick Small, Stagecoach Bus Dr Small 998

> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 141

MAIN 141 para 9.4.52 Business Park North of London Road –

Land to the east of the draft allocation is identified as an area of future expansion. This is strongly supported by Stagecoach. This may assist in the shorter term in providing for a suitable operating Centre for bus services serving Chipping Norton and the wider area, as discussed above.

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**MM45**

Nigel Rose Mr Rose 112

> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 142

When the Local Plan was originally developed, it made sense to concentrate housing developments in the three market towns. However, it is not appropriate to merely extrapolate the original allocations to take the additional numbers required by the Inspector and the SHMA. In particular, it is not sustainable to allocate an additional 800 homes to the Chipping Norton SDA. The percentage of residents employed locally has been falling steadily over the last decade and is now below 30%. Employment growth in the County is centred on the 'knowledge spine' running from Bicester through Oxford to the South. Chipping Norton is too inaccessible to attract significant potential employers, who will want to locate near the clusters along the spine. The main employment locally is for 'minimum wage' jobs in retail and caring sectors. New residents looking for professional or technical jobs will be forced to commute by car using the sub-standard A44 towards Oxford or the more dangerous A361 towards Banbury. The bus service to Oxford only runs hourly and has to cope with the severe congestion in the Wolvercote roundabout area. Access to the North Cotswold
railway line at Kingham is also difficult - the connecting bus service is now sparse and unreliable following the County Council cuts, not as implied in para. 7.58. The additional 800 homes must be allocated nearer to Oxford with easy access to a railway line, thereby linking easily to the main employment areas in the County. The modified Plan already picks up on this logic, by proposing the Eynsham garden village with good links to Hanborough station (and with the potential to be eventually linked to a re-opened railway line to Witney) and with employment areas nearer to the 'knowledge spine' clusters. The Chipping Norton "800" should therefore be reallocated to the Eynsham area or sites even nearer to Oxford, with a start date earlier than the 2021 proposed for the garden village.

The Chipping Norton Eastern Link Road proposed as part of the Tank Farm SDA will not achieve the reduction in HGVs through the town centre - the vast majority of HGVs are on the A44 towards Evesham, not on the A361. The link road will be a "road from nowhere to nowhere". The money on the link would be wasted and reduce the likelihood of achieving a proper Chipping Norton by-pass on the A44.

The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.

| MM479 | Crest Strategic Projects | Crest Strategic Projects | Crest Strategic Projects | Crest Strategic Projects | Main 142 | 8.62 The link road is regarded as an "integral element" of the SDA (paragraph 9.4.56) to divert a large percentage of the HGV movements and improve air quality. However, the additional transport evidence produced on behalf of Oxfordshire County Council notes that the 600 unit scheme would result in the lowest levels of traffic on all key approaches into the town centre, despite the absence of a link road (paragraph 9.1.3). Moreover, the predicted traffic flows on the High Street corridor for all development scenarios (+600, +850 and +1500) would be substantially higher than existing volumes as surveyed in 2016 (paragraph 9.1.4) and traffic flows elsewhere on the network would also increase, principally as a result of the impact of the increased level of development itself (paragraph 9.1.5). Therefore, the Council's assertions that the link road would mitigate the impact of the development, improve air quality and divert HGVs are not corroborated by the evidence base. | Main 145: Paragraphs 9.5.1-9.5.3a | The WODCPlan amazingly seems ignorant of the OCCs 'West Oxfordshire Weight Limit Zone' which is in the process of implementation in 2017. Others at WODCare fully aware. Consequently:
new paragraph after 9.4.56
- "The West Oxfordshire Weight Limit Zone which is in the process of being implemented by Oxfordshire County Council will reduce HGV traffic through Chipping Norton and reduce the air pollution substantially." |
9.1 The importance of the role that Eynsham has so play in meeting identified development needs is solely in the context of responding to the unmet housing needs of Oxford City, based on the preferred spatial strategy that underpins the Local Plan and the evidence base that the Council has prepared to support policy making. Paragraph 9.5.1 should be qualified to make clear that Eynsham has been identified as a candidate location that potentially has an important role to play in helping to meet the unmet housing needs of Oxford under the duty to cooperate.

9.2 The modifications to 9.5.3 are unsubstantiated by evidence and cannot be relied upon as presenting a clear and convincing justification for development in this location. The officers advised their Members initially in the main report to Council on proposed modifications to the Local Plan that the inclusion of development allocations at Woodstock would cause no harm either to the historic character of the settlement or to the setting of Blenheim Palace. However, this was subsequently revised to acknowledge harm, although this was suggested to be at a level that would not cause ‘undue harm’ (Appendix 10).

9.3 Nevertheless, the importance is that harm is recognised and admitted: In a plan-making context it is therefore necessary in demonstrating clear and convincing justification, as required by the NPPF, to demonstrate why development should be allocated in this location compared to other available locations (that accord with the overall spatial strategy). The Council has not carried out this exercise sufficiently to provide such justification and therefore the proposed allocations at Woodstock are unsound and should be deleted from the Local Plan.

9.4 The proposed modifications applying to Long Hanborough are considered to be justified and reasonable in the context of the setting and proximity to Blenheim Palace and the wider landscape setting referred to. The drafting refers to recently approved schemes for 169 homes and 50 homes, but does not refer to the 3 March 2016 refusal of a scheme for 120 dwellings on land adjoining the station (Appendix 11). Importantly, in the context of the Council’s approach to and treatment of heritage considerations, there appears to be a distinct difference in the approach taken to the assessment of heritage considerations from a development management perspective, compared to the plan-making exercise. In the reasons for refusal heritage and landscape considerations are afforded significant weight by the Council in the determination. Reason 4 is set out below:

The site is located within the setting of the Blenheim Park Grade 1 Listed Park and Garden, World Heritage Site and the Grade II Listed Old Farmhouse. An agricultural landscape setting for these heritage assets is provided by farmland to the north and south of the A4095, the wider Evenlode Valley and Cotswolds AONB north of the A4095. The proposed development would replace a large parcel of agricultural land forming an important gap in development, with a housing estate, which would be materially harmful, altering the setting of these heritage assets by imposing an extensive and visually significant development within this landscape. In addition views of the assets from the public footpath 238/1/10 would be dramatically changed by the presence of the housing, reducing the appreciation of them in an open landscape. By reason of the nature, scale and proximity of the development, the proposal is contrary to Local Plan Policies BE8, BE11, emerging Local Plan Policies EH7 and EW1 and section 12 of the NPPF, in particular paras 131, 132, 134 and 137. The harm in relation to these heritage assets is considered less than substantial (regarding para. 134 of the NPPF), but this harm is not outweighed by any benefits of the proposal.

9.5 There are striking similarities between the proposal subject to this refusal and the three proposed allocations at Woodstock. However in the case of Woodstock the sites are either closer to the WHS site, or are located within an area of acknowledged sensitivity to the setting. In two out of
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1609</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 142</td>
<td>the three cases the sites are also substantially larger. All would involve the development of open countryside, which would change the character of the setting of the WHS and the conservation area. Taking these factors into account the Council has clearly adopted an inconsistent approach in the treatment of heritage considerations and has identified allocations without due regard to heritage. The approach to allocations within the sub-area is considered to be unsound in this regard.</td>
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<td>The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive. There is also a new proposal for an ‘eastern link road’ which is also covered in changes MAIN 136 to MAIN 144 to the Local Plan. CPRE wishes to raise objections to these proposed changes on the following grounds.</td>
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<td>WYG were appointed by Oxfordshire County Council to prepare a strategic Chipping Norton Transport Options Study (CINTOS). This study concluded that ‘Given that an existing AQMA is already declared in this location, it might be reasonable to conclude that all development options would be likely to exacerbate air quality management issues’ (paragraph 11.1.6 of the report).</td>
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<td>The building of 1,400 homes at Tank Farm was one of these development options. The report also notes ‘in each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre(paragraph 10.1.2). The study also attempted to ‘identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End)” (paragraph 9.1.3).</td>
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<td>The report concludes that ‘the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack of likely effectiveness and / or unacceptable knock-on impacts” (paragraph 10.6.1). The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.</td>
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<td>The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping</td>
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Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

Road Safety

Road safety issues in the centre of Chipping Norton are very closely connected with the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close proximity. It has been the site of several fatal accidents in recent years.

Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to ‘address the relatively high rate of fatalities and serious injuries on the District’s road network’ (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.

Traffic

The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:

· Other traffic related comments

The way the Transport Options Study was carried out

The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate
data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in March and were intended to assess “normal” traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren’t the surveys carried out during these busier times of the week?

In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the town. Why wasn’t the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:

"However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town resulting from a combination of redistribution and the increased level of development on the Tank Farm site."

* The report also reports that this option “would be likely to exacerbate air quality management issues” – paragraph 11.1.15.

* The health of residents and people working in the centre of Chipping Norton would be put further at risk – see section CN4 above.

* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1
In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would "operate well in excess of their theoretical capacity" and that the other 3 "would all remain operating within or, worst-case, at capacity for all of the potential development scenarios" – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that "the operational impact of additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate" – paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.

Other traffic related comments

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31.

The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ – paragraph 11.1.18.

However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘..... there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’.

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn't the Transport Options Study for Chipping Norton conclude that ‘delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031’ (paragraph 11.1.21)?

The Transport Options Study report also concludes that this option “would be likely to exacerbate air quality management issues” – paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:
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<td>* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.</td>
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<td>* The town has been experiencing severe air quality issues and the associated detrimental effects on people's health for at least a decade.</td>
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<td>* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.</td>
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<td>* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.</td>
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<td>* All the time traffic through Chipping Norton increases and these problems get worse.</td>
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<td>When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton's traffic related problems. However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town's residents and visitors to expect a better solution than this?</td>
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<td>Car parking</td>
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<td>Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: 'The availability of adequate public parking capacity is a key constraint in Chipping Norton' (paragraph 9.4.30) and 'Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate' (paragraph 9.4.60).</td>
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<td>The Local Plan states: 'The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre' (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping.</td>
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<td>A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and especially if doing a large weekly shop.</td>
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<td>The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before</td>
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development is permitted at the ECNSDA the problem of how to provide significant extra car parking capacity in the town centre needs to be resolved and funding secured for this.

School capacity

The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: 'it is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation' (paragraph 9.4.48).

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of school age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size. The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people

One of the Core Objectives identified in the Local Plan is: 'CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel' (paragraph 3.7).

Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally.

Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton:

'Chipping Norton will strengthen its role as a centre of enterprise in the northern part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.' (paragraph 3.2)

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a
relatively short time period must put at risk the special character of the town. Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that 'the number of people living and working in the town has fallen from 50% to 36% since 2001' (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes in the ECNSDA it is surely only a matter of time before one of the major supermarkets puts forward plans for a large new store on the outskirts of Chipping Norton.

Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.

There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: ‘Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre’ (paragraph 9.4.61). However there is no explanation of how pressures for ‘out of centre development’ will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

* Measures to reduce air pollution
* Improvements to road safety in Chipping Norton
* New road
* Other improvements to roads in and around the town
* Extra car parking
* Improving conditions throughout the town and surrounding areas for pedestrians and cyclists,
including accessibility to bus and rail services
* - New primary school
* - Significant expansion of secondary school
* - Mitigation measures for the impact on the Conservation Target Area (CTA) and the SSSI

Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask: where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?

If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be

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**MM727**
Archstone Land

Jonathan Porter
Mr
Porter
1652

> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 142

The draft Plan could be considered unsound (not positively prepared or effective) if the SDA cannot deliver the necessary infrastructure on time.

Any benefit from the proposed Tank Farm SDA link road will only be delivered towards the end of the plan period at the earliest (around 15 years’ time). In the meantime, it will be important for smaller sites to contribute for other measures in the Town Centre to help reduce congestion and improve air quality for current generations in accordance with draft Policy T2.

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**MM738**
Cala Homes Chiltern

- Cala Homes (Chiltern)
- Cala Homes (Chiltern)
1735

> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 142

Paragraphs 9.4.56 and 9.4.57

The same issue is raised as per our comments on Main Modification 62.

CALA supports the provision of an eastern link road, recognizing the benefits that this could bring to improve air quality in Chipping Norton Town Centre.

However, further highway modelling is required to identify the level of benefit that this road would bring, the type/width of road and its precise alignment. All of these factors could have significant effects on the viability of the SDA. The work will be taken forward as part of the detailed design of the SDA and covered in a comprehensive Transport Assessment. As such the Local Plan must retain a flexible approach to the provision and delivery of the road.

In addition, the road is indicatively shown passing over land outside of the SDA boundary. The Council should consider funding from other developments in the Chipping Norton Sub area that would directly benefit from it. The Council must also be willing to use compulsory purchase powers to ensure delivery of the road as a last resort in the public interest.

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**MM738**
Cala Homes Chiltern

- Cala Homes (Chiltern)
- Cala Homes (Chiltern)
1749

> SECTION 9 - STRATEGY AT THE

CALA recognises the need for a road around the east of the Town and the benefits that this could bring. However, further highway modelling is required to identify if this road is required as currently set out in the Main Modifications, the type of road and its precise alignment.
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<tr>
<td>MM771</td>
<td>Stormport (UK) Ltd</td>
<td>Stormport (UK) Ltd</td>
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<td>Stormport (UK) Ltd</td>
<td>2049</td>
<td>LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 142</td>
<td>As such CALA requests, as per paragraph 9.4.44a of the Local Plan that the route for the link road remains indicative at this stage to provide flexibility in the detailed design stage. Commentary should be amended to include that the route of the link road should be subject to the masterplanning of the whole site to ascertain the best location and that the viability of the road needs to be assessed. CALA also seeks changes to ensure that other developments in the Chipping Norton sub-area contribute financially to the road if they would benefit from it. The Plan needs to acknowledge that the Council would, as a last resort, consider use of compulsory purchase powers to enable delivery of the road.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2255</td>
<td>MAIN 142 – Policy CN2</td>
<td>Stormport support the Policy in so far as modified. However, increasing the housing target should have allowed for a more positive expression of housing delivery in the surrounding villages.</td>
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<tr>
<td>MM27</td>
<td>andrewwildman</td>
<td>MR</td>
<td>-</td>
<td>Wildman</td>
<td>50</td>
<td>MAIN 142 – Policy 9.4.56</td>
<td>More recently on behalf of the District Council, Oxfordshire County Council have commissioned additional transport evidence for Chipping Norton to help inform the Local Plan. The report concludes that the provision of an eastern link road for Chipping Norton could have a beneficial impact on HGV movements through the town centre, potentially diverting a large percentage of HGV movements and thereby having a beneficial impact on air quality. The provision of this link road is therefore an integral element of the proposed East Chipping Norton Strategic Development Area (SDA). The proposed placement of the road would seem to be one of few options but will have little or no impact on the amount of lorries passing through the town. Those lorries travel the A44 and impact the High Street and New Street going to and from Worcester and or Cheltenham. The link road doesn't address this and would likely only cause more congestion on the Burford Road which would run past the Secondary School.</td>
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<tr>
<td>MM315</td>
<td>Richard Gwinn</td>
<td>-</td>
<td>-</td>
<td>Gwinn</td>
<td>578</td>
<td>-</td>
<td>The proposed link road in Chipping Norton appears to be a &quot;road to nowhere&quot; as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this relief road. This increase in traffic will also affect air quality, which is already at illegal levels.</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>999</td>
<td>Norton Sub Area &gt; MAIN 142 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 142</td>
<td>As recorded elsewhere, Stagecoach supports this proposal and its supporting policy and explanatory text, including this modification.</td>
</tr>
<tr>
<td>MM445</td>
<td>Thames Valley Police - Simon Dackombe</td>
<td>Mr</td>
<td>Dackombe</td>
<td></td>
<td>1020</td>
<td>Norton Sub Area &gt; MAIN 143 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 142</td>
<td>In the third to last bullet point – please make reference to “emergency services”.</td>
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<tr>
<td>MM45</td>
<td>Nigel Rose</td>
<td>Mr</td>
<td>Rose</td>
<td></td>
<td>113</td>
<td>Norton Sub Area &gt; MAIN 143 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 143</td>
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1610</td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 143</td>
<td>The commercial viability of the Stagecoach S3 bus to Oxford and the availability of a cadre of local drivers is dependent upon an overnight bus park in Chipping Norton. As part of the masterplan for the Tank Farm development a site of at least 0.3 Ha should be set aside for this vital bus parking.</td>
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<td>The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive.</td>
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<td>There is also a new proposal for an 'eastern link road' which is also covered in changes MAIN 136 to MAIN 144 to the Local Plan. CPRE wishes to raise objections to these proposed changes on the following grounds.</td>
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<td>Air Quality</td>
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<td>WYG were appointed by Oxfordshire County Council to prepare a strategic Chipping Norton Transport Options Study (CNTOS).</td>
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<td>This study concluded that 'Given that an existing AQMA is already declared in this location, it might be reasonable to conclude that all development options would be likely to exacerbate air quality management issues' (paragraph 11.1.6 of the report). The building of 1,400 homes at Tank Farm was one of these development options. The report also notes 'in each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre(paragraph 10.1.2).</td>
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<td>The study also attempted to 'identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End)' (paragraph 9.1.3).</td>
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<td>The report concludes that 'the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack of likely effectiveness and / or unacceptable knock-on impacts' (paragraph 10.6.1).</td>
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<td>The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.</td>
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<td>The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without</td>
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Having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

**Road Safety**

Road safety issues in the centre of Chipping Norton are very closely connected with the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close proximity. It has been the site of several fatal accidents in recent years. Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to 'address the relatively high rate of fatalities and serious injuries on the District’s road network' (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.

**Traffic**

The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:

- Other traffic related comments

The way the Transport Options Study was carried out

The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in
March and were intended to assess "normal" traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren’t the surveys carried out during these busier times of the week?

In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the town. Why wasn’t the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:

"However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town resulting from a combination of redistribution and the increased level of development on the Tank Farm site."

* The report also reports that this option "would be likely to exacerbate air quality management issues" - paragraph 11.1.15.
* The health of residents and people working in the centre of Chipping Norton would be put further at risk – see section CN4 above.
* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1

In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would “operate well in excess of their theoretical capacity” and that the other 3 “would all remain operating
within or, worst-case, at capacity for all of the potential development scenarios” – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that "the operational impact of additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate” – paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.

Other traffic related comments

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31.

The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ – paragraph 11.1.18.

However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘.... there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’.

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn't the Transport Options Study for Chipping Norton conclude that ‘delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031’ (paragraph 11.1.21)?

The Transport Options Study report also concludes that this option "would be likely to exacerbate air quality management issues” – paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:

* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.
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* The town has been experiencing severe air quality issues and the associated detrimental effects on people’s health for at least a decade.

* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.

* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.

* All the time traffic through Chipping Norton increases and these problems get worse.

When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton’s traffic related problems. However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town’s residents and visitors to expect a better solution than this?

**Car parking**

Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: ‘The availability of adequate public parking capacity is a key constraint in Chipping Norton’ (paragraph 9.4.30) and ‘Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate’ (paragraph 9.4.60).

The Local Plan states: ‘The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre’ (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping.

A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and especially if doing a large weekly shop.

The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before development is permitted at the ECNSDA the problem of how to provide significant extra car parking capacity in the town centre needs to be resolved and funding secured for this.
School capacity

The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: "it is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation" (paragraph 9.4.48).

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of school age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size. The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people

One of the Core Objectives identified in the Local Plan is: "CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel" (paragraph 3.7).

Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally.

Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton:

'Chipping Norton will strengthen its role as a centre of enterprise in the northern part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.' (paragraph 3.2)

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a relatively short time period must put at risk the special character of the town.

Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority
of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that 'the number of people living and working in the town has fallen from 50% to 36% since 2001' (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes in the ECNSDA it is surely only a matter of time before one of the major supermarkets puts forward plans for a large new store on the outskirts of Chipping Norton.

Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.

There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: 'Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre' (paragraph 9.4.61). However there is no explanation of how pressures for 'out of centre development' will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA

Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

* · Measures to reduce air pollution
* · Improvements to road safety in Chipping Norton
* · New road
* · Other improvements to roads in and around the town
* · Extra car parking
* · Improving conditions throughout the town and surrounding areas for pedestrians and cyclists, including accessibility to bus and rail services
* · New primary school
* · Significant expansion of secondary school
Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask: where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?

If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be

My Client owns land to the east of the proposed allocation at the Chipping Norton SDA. The changes made to Policy CN1 and CN2 set out in the proposed modifications are fully supported, especially the comprehensive development of the allocation via an agreed master plan whilst allowing for individual applications to come forward. In such a situation, it is important to put in place a mechanism to assist in the delivery of the infrastructure needed to support the development, including the proposed link road, new school and open space/landscaping. In terms of delivery, my Client is working with other landowners and promoters to bring forward the proposed development in a timely manner.

INTRODUCTION AND SUMMARY

i. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Empire Homes Limited who have land north of the A44 and south of the Banbury Road, Chipping Norton under their control. The land extends to approximately 42 hectares and is identified on the plan attached as Appendix 1 to these representations.

ii. Empire Homes Limited object to Table 4.1 (Main Modification, MM, 14) Policies H1 (MM24), H2 (MM29 and MM30), CN1 (MM140) and CN2 (MM143) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.

iii. Edgars Limited have prepared representations on behalf of a number of clients which demonstrates that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only 2.7 year supply can be demonstrated. Edgars consider that additional sites are required to be allocated to ensure sufficient housing land supply.

iv. Land north of the A44 and south of the Banbury Road, Chipping Norton is available and capable of delivering residential development in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. The following representations provide further information on the land north of the A44 and south of the Banbury Road.
1.0 DELIVERY AT EAST CHIPPING NORTON SDA (Policy CN1, MM138-MM140)

1.1 The East Chipping Norton allocation has been increased from about 600 dwellings at Tank Farm south of the London Road to 1,400 dwellings including 1,200 dwellings south of London Road and 200 north of London Road. The SDA now includes the provision of an Eastern Link Road.

1.2 Limited evidence has been published to demonstrate and assess the impacts of the increased allocation. The previous assessment of Strategic Site Options (Examination Document Ref OTH1) has not been updated. This provides a comprehensive overview of the site and a summary of the site constraints and impacts.

1.3 There would appear to be no evidence document which provides a summary of the modified East Chipping Norton SDA and its constraints. The SHELAA assesses a number of component sites but there is no expression of the overall size of the site and its developable area to ascertain whether delivery is realistic.

1.4 Previous landscape evidence was prepared for the Council by Kirkham Landscape Planning, the Landscaper and Visual Review of Chipping Norton Strategic Site Option (May 2014, Examination Document Ref LAN2). This concludes an indicative housing capacity for the land south of London Road of 500 dwellings within a similar area as now proposed by the Council.

1.5 This is significantly lower than the 1,200 dwellings now assumed by the Council and draws into question the deliverability of this number of dwellings.

1.6 Furthermore, it is noted that the East Chipping Norton SDA now also includes the provision of a link road through the allotment garden land.

1.7 The updated Infrastructure Delivery Plan 2016 does not provide a cost estimate for the provision of the link road. It is unclear what has been assumed for viability purposes.

1.8 Edgars Limited understand that the allotment land is under the ownership of Chipping Norton Town Council who object to the provision of the link road. This draws into question the deliverability of the eastern link road which is now integral to the modified East Chipping Norton allocation.

1.9 In Edgars opinion, the increased allocation at East Chipping Norton is not justified by the published evidence and there is a significant risk that it will not be realised.

1.10 Empire Homes Limited object to Policies H1 (MM24), H2 (MM29 and MM30), CN1 (MM140) and CN2 (MM143) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and contend that Land north of the A44 and south of the Banbury Road, Chipping Norton should be allocated to assist with the delivery of the East Chipping Norton SDA.

The draft Plan could be considered unsound (not positively prepared or effective) if it does not provide for enough community infrastructure in the earlier part of the plan.
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<th>Respondent ID</th>
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<tr>
<td>MM728</td>
<td>Abbey Developments and David Wilson Homes Southern</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1675</td>
<td>LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 143</td>
<td>The proposed large increase in dwellings at Chipping Norton places a greater emphasis on the need to improve community infrastructure including opportunities for recreation located conveniently for the town. This should not just be to serve the new urban extension and community at Tank Farm.</td>
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<tr>
<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>-</td>
<td>Cala Homes (Chiltern)</td>
<td>1736</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 143</td>
<td>Policy CN2 - Chipping Norton Sub-Area Policy CN2 (MAIN143) should be amended to propose 1,530 homes including 600 at Tank Farm. Figure 9.14 (MAIN144) should be amended to reflect the revised proposal.</td>
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<tr>
<td>MM738</td>
<td>Cala Homes Chiltern</td>
<td>Cala Homes (Chiltern)</td>
<td>-</td>
<td>Cala Homes (Chiltern)</td>
<td>1750</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 143</td>
<td>CALA supports the main modifications to policy CN2. Chipping Norton is a sustainable location to accommodate growth within West Oxfordshire. Land to the east of Chipping Norton is outside of the AONB and can provide infrastructure improvements to enable the scale of development to come forward. CALA is working with other landowners and developers to bring forward to the SDA.</td>
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<td>MM742</td>
<td>Ms E Cook</td>
<td>Ms Cook</td>
<td>-</td>
<td>-</td>
<td>1767</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping</td>
<td>CALA recognises the need for a road around the east of the Town and the benefits that this could bring. However, further highway modelling is required to identify if this road is required as currently set out in the Main Modifications, the type of road and its precise alignment. As such CALA requests, as per paragraph 9.4.44a of the Local Plan that the route for the link road remains indicative at this stage to provide flexibility in the detailed design stage. Commentary should be amended to include that the route of the link road should be subject to the masterplanning of the whole site to ascertain the best location and that the viability of the road needs to be assessed. CALA also seeks changes to ensure that other developments in the Chipping Norton sub-area contribute financially to the road if they would benefit from it. The Plan needs to acknowledge that the Council would, as a last resort, consider use of compulsory purchase powers to enable delivery of the road.</td>
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**INTRODUCTION AND SUMMARY**

1. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited (Edgars) on behalf of the owners of land adjoining the north west side of 34 Churchill Road, Chipping Norton. The land comprises approximately 4.5ha and is identified on the plan attached as Appendix 1 to these representations.
ii. The owners object to Policies H1 (Main Modification (MM) 24), H2 (MM29 and MM30) and CN2 (MM143) on the basis that insufficient sites for housing have been identified to provide for a five year supply of housing in accordance with national policy.

iii. Edgars have prepared representations on behalf of several clients which demonstrate that a five year land supply cannot be demonstrated when appropriate assumptions are used in accordance with national planning policy and guidance. These representations conclude that only a 2.7 year supply can be demonstrated. Edgars consider that additional non-strategic sites are required to be allocated to ensure a sufficient housing land supply.

iv. Land at 34 Churchill Road and adjoining land to the north west is under the control of one family. It is available now and can deliver around 75 homes in a sustainable location to help boost housing supply, ensure a 5 year supply of housing and provide robustness to ensure that the housing requirement of the modified WOLP 2031 is delivered.

v. The following representations provide further information on the site at Churchill Road and should be read in conjunction with Edgars’ general representations regarding housing supply which are not repeated here.

1.0 LAND NORTH WEST OF 34 CHURCHILL ROAD, CHIPING NORTON

1.1 Our clients object to Policies H1 (Main Modification (MM) 24), H2 (MM29 and MM30) and CN2 (MM143) on the basis that the modified plan has not identified sufficient housing land to provide for a 5 year supply of housing and that land at 34 Churchill Road and adjoining land to the north west should be allocated for around 75 homes to help address this deficiency.

Site and Surrounding Area

1.2 The site is situated in the south western part of Chipping Norton, which is the third largest town in the district offering both residents and visitors a good range of services and facilities. The site lies approximately 700m from the town centre and is a similar distance from Chipping Norton Leisure Centre and Chipping Norton School (secondary). There are bus stops located on Churchill Road (within 150m of No. 34 Churchill Road), which provide access to a high frequency service to Oxford (S3) and a slightly less frequent service to Banbury (488). There is also a service (X8) that links Chipping Norton with Kingham Railway Station. The site is therefore in a highly sustainable location.

1.3 The site comprises approximately 4.5 hectares of land, identified on the plan attached at Appendix 1. The land forms part of the side of a valley and slopes downwards from the south east to the north west of the site. There is a two story dwellinghouse at 34 Churchill Road with vehicular access and egress to the front of the property via dropped kerbs in two locations. Access to the land at the rear (north west) of 34 Churchill Road is via an agricultural gate and grassed track situated between numbers 34 and 32 Churchill Road. The land north west of 34 Churchill Road is not currently actively used for agriculture, except for occasional grazing. Consequently, it could be described as unmanaged grassland, declining in quality. This land is divided into two parts, almost equal in area, by a tree-lined stream which runs from the site’s southernmost corner to its northernmost corner. The trees along this line are substantial and mature and are effective as a visual barrier.
1.4 The principal north-eastern and south-eastern site boundaries are shared with residential properties at The Leys and Lords Piece Road respectively. The rear gardens which back onto the site include considerable tree cover in the more Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation, December 2016 4 historic environment of The Leys. There is less tree cover in the 20th century residential development at Lords Piece Road which forms the more elevated backdrop to the site. There is a small group of industrial buildings, with a high number of trees in the curtilages, immediately adjacent to the site’s northwestern boundary along the route of a former railway line in the floor of the valley. The group contains some relatively modern structures, which are unremarkable, but among them sits Bliss Mill. This is an imposing 19th century building (now converted to apartments), Grade II* listed and a notable local landmark. Beyond the industrial buildings lies the Chipping Norton Regulated Pastures, which is common land with open public access for recreation. Open countryside lies to the south west of the site.

1.5 The site falls within the Cotswolds Area of Outstanding Natural Beauty, the Chipping Norton Conservation Area and the setting of the listed building (Bliss Mill).

1.6 The ‘Cotswolds AONB Landscape Strategy and Guidelines’ (adopted in June 2016) states in relation to ‘Vale of Moreton Farmed Slopes’ Character Area (in which the site is situated) that the expansion of existing settlements onto the Farmed Slopes is regarded as a local force for change, with a range of potential landscape implications including the ‘encroachment of built development onto the Farmed slopes intruding into the landscape, particularly on the more prominent upper slopes’.

1.7 It is to be noted in this instance that the site does not occupy the uppermost slopes. The existing substantial tree cover, both on the perimeter and a belt running through the site, makes the land less visually prominent than the common land to the north west and the open countryside to the south west.

1.8 The Chipping Norton Conservation Area Character Appraisal identifies the bowl-shaped valley landscape setting of Bliss Mill as the most significant area of open space in the Conservation Area. While it is envisaged that within the Conservation Area the existing buildings, land uses, historic settlement patterns and open spaces should remain largely undisturbed, the guidance does enable development where views into and out of Chipping Norton, as well as views within Chipping Norton, are not harmed and where existing features of historic, visual or natural importance, such as trees, hedgerows, ponds, stone walls, paths and tracks are incorporated.

1.9 The site is not within an area that is at risk from flooding.

1.10 The site has not previously been submitted to the Council or considered in the Strategic Housing and Economic Land Availability Assessment (SHELAA).

1.11 Additional technical work, including a Landscape and Visual Impact Assessment is currently
being undertaken and likely to be available in advance of further WOLP 2031 examination hearings. Without prejudice to this further work, the following planning considerations are identified as relevant to the potential allocation of the site.

The principle of housing development at Chipping Norton

1.12 Chipping Norton is identified as a Main Service Centre in the Local Plan 2031. Draft WOLP Policy H2 permits new housing on undeveloped land adjoining the built-up area to meet identified housing needs. As such housing development on the site would be acceptable in principle.

1.13 Draft Policies H2 and CN2 seek to secure the delivery of 2,400 new homes focused on Chipping Norton. Delivery is proposed partly through a strategic mixed used development area of around 1,400 dwellings on the eastern side of Chipping Norton. The provision of an eastern link road is an integral part of the proposed Strategic Development Area (SDA).

1.14 In Edgars opinion, there is a significant risk of delays in delivery on SDAs which is likely to result in continuing housing supply deficits. There is a need to address deficiencies in the 5 year housing supply. Given the long lead in times of SDAs, addressing the current supply deficiencies is best achieved through allocating additional non-strategic developments such as Land at 34 Churchill Road and adjoining land to the north west.

1.15 In Edgars opinion, the development of Land at 34 Churchill Road and adjoining land to the north west can comply with Policy H2 in being adjacent to the built up area of a Main Service Centre in the settlement hierarchy. Settlement character, AONB landscape and Conservation Area

1.16 Draft Policy OS2Locating Development in the Right Places states that a significant proportion of new homes, jobs and supporting services will be

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton West Oxfordshire Local Plan 2031 Proposed Modifications Consultation, December 2016 focused within and on the edge of the main service centres of Witney, Carterton and Chipping Norton. Development is required to:

- form a logical complement to the existing scale and pattern of development and/or the character of the area;
- Be compatible with adjoining uses and not have a harmful impact on the amenity of existing occupants;
- as far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s;
- be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities; and
- Conserve and enhance the natural, historic and built environment.

1.17 The site is surrounded on three sides by existing residential and industrial development. It is considered that allocating the site for housing would form a logical extension of the existing built-
up area, without encroaching on the more visually prominent parts of the valley that would otherwise cause harm to the setting of Bliss Mill.

1.18 Use of the land for housing is entirely compatible with the adjoining residential development at The Leys and Lords Piece Road. The retention of existing trees and hedgerows, especially on the perimeter of the site, will help to ensure that there is no harmful impact on the amenity of the existing occupiers of properties in these two roads. It will also help to preserve and enhance the character and appearance of the conservation area.

1.19 A new all-purpose access road is capable of being provided off Churchill Road following demolition of the existing dwelling at No. 34. A 6.0m wide access road with 9.0m radii (like the Lords Piece Road/Churchill Road junction) with 2.0m wide footways each side would be constructed. Junction visibility splays of 2.4m x 43m are readily available in accordance with the 30mph speed limit on Churchill Road. An offset distance of 20m (centreline to centreline) would be provided between the new access and the cul-de-sac on the opposite side of Churchill Road, named Edward Stone Rise. This specification would facilitate a development of up to 150 dwellings. However, having regard to the importance and sensitivity of the landscape, the character and appearance of the Conservation Area and the setting of the listed building, it is considered that around 75 dwellings would represent a more appropriate scale of development for this site.

Representations on behalf of the owners of land north west of 34 Churchill Road, Chipping Norton

1.20 If the total number of dwellings on the site generated a need for a separate emergency access, this could be achieved by utilising existing rights of access to the gate in the northern corner of the site, from The Leys/Station Road. It would also provide an additional means of access for pedestrians and cyclists. In this manner, the development would be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities.

1.21 The character and appearance of the AONB and the Conservation Area can be preserved and enhanced through a high quality evidence based development within a strong and extensive landscape framework. While the extent of the land is 4.5ha, around 75 dwellings are proposed leaving significant scope for open space and landscaping.

1.22 In Edgars opinion, a development of this scale does not comprise ‘major’ development for the purposes of NPPF paragraph 116 and that a development within a strong landscape framework will not have a significant adverse impact on the landscape and scenic beauty of the wider AONB. The public benefits of the scheme would outweigh any harm to the Conservation Area and the setting of Bliss Mill.

1.23 Although further work is being undertaken, Edgars consider that development can be achieved on the site which makes an important contribution to meeting housing land supply in a sustainable location, without significant impact on the settlement character, AONB or the Conservation Area.

1.24 Further detailed technical information is likely to be available during the next stages of the WOLP 2031 Examination.

For similar reasons set out in relation to Main Modification 136, objection is raised to Main Modification 143 since it fails to include land north of Holliers Crescent, Middle Barton as a housing allocation for approximately 100-120 dwellings.
The omission site is identified on the site location plan included in Annex 1 to these representations. The overall site area extends to approximately 7.88 hectares. However, the preliminary concept plans also included in Annex 1 indicates a developable area of approximately 3.72 hectares. The scale of development proposed is commensurate with the scale and character of the village. It is therefore acceptable in principle within the terms of the emerging development strategy irrespective of whether Middle Barton is categorised as a village or specifically as a Rural Service Centre.

The concept plan demonstrates the potential to deliver significant community benefits in terms of:

- Extension of existing sports pitches on land to the west.
- Extension of existing children's play area / open space.
- Community park through which could be provided east-west connections between an existing footpath that borders the site to the east, and one that runs on a north-south axis through the site towards its western boundary. - Provision of off-street car parking for existing residential properties.
- Provision of a Community Orchard and Allotments
- Provision of a signal-controlled crossing facility, by way of a Puffin Crossing, on the B4030 North Street which would enhance the safety of pedestrian routes to the Primary School (see Transport Note at Annex 2 to these submissions).

Access is proposed from Holliers Crescent to the south of the site. The site inclines gently upwards from its southern boundary adjacent to Holliers Crescent. The land is in agricultural use, and has few landscape features. It is not subject to any environmental or restraint designations. Whilst part of Middle Barton is a designated Conservation Area, the site is not within the designation and is separated from it by modern housing estate development to the south of the site.

Preliminary assessments have been undertaken and found as follows:

- Ecology: an extended Phase 1 Habitat Survey with protected species survey has been undertaken (November 2016). This found the site to have little biodiversity value.
- Arboriculture: an arboricultural assessment has been undertaken (November 2016) which included the omission site and considerable additional land to the north. This found that, by virtue of all the existing tree cover being confined to the boundaries, development of the site in accordance with the concept plan will result in no significant tree or hedgerow loss. All existing trees will be retained within the green infrastructure, and with the opportunity for it to be reinforced with new planting.

A preliminary Transport Note is also included with these representations (at Annex 2), the findings of which can be summarised as follows:

- The site can be satisfactorily accessed via a single point comprising a simple priority junction directly from Holliers Crescent.
- Pedestrian permeability to and through the site will be maximised, with the potential for new connections to the recreation ground to the west and from there through to Worton Road, that would also benefit the existing community to the south.

- The site is within reasonable walking distance of a range of everyday facilities, and accessibility can be enhanced through the creation of new pedestrian routes that connect with existing public rights of way and enhance permeability for the existing community. Connections to the Primary School can be enhanced through provision of a Puffin Crossing on the B4030, North Street.

- The site is within reasonable cycling distance of key local employment hubs to the west, and Heyford Railway Station to the west. Covered cycle parking is already available at the Station.

- There are rail services from Heyford Station to Banbury (16 minutes) and Oxford (15 minutes) from where there are fast connections to Birmingham, Reading, London and may other destinations. Heyford Station is also accessible by bus with a journey time of 10 minutes, including at a time to coincide with work journeys. As set out in the Transport note, the proposed development can assist with improving public transport both directly through financial contributions, and indirectly through additional patronage from an increased resident population.

- The settlement has reasonable accessibility by bus services, and the proposed development offers potential for enhancement through proportional contributions.

The overall benefits of the proposed development are considerable, and can be summarised as follows:

- Accommodating necessary housing growth on a site that is immediately deliverable, and can thus make a positive contribution to alleviating the shortfall in the five year supply of deliverable housing land, and the backlog that it incorporates.

- Accommodating housing growth on a site that is free from environmental constraints (landscape, heritage, biodiversity, flood risk etc).

- Delivering growth that will contribute to the retention and development of local services and community facilities in villages through increasing the critical mass of population that is necessary to support them, for the benefit of residents of the settlement itself and the communities in the hinterland that it serves.

- Allocating housing growth that can deliver direct community benefits for the settlement (as outlined above).

- Allocating housing growth that will contribute importantly to the choice of locations in which to live, whilst maintaining realistic a choice to undertake work journeys by transport modes other than the car (and in particular by train).

- Allocating a site that can, and will, contribute to the requirement to boost significantly the supply of housing to 'meet' the objectively assessed needs for the District, including the unmet needs arising from the city of Oxford.

- Delivering much needed affordable housing.
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| MM752        | Bloombridge             | Bloombridge    | Mr               | Cutler            | 1968       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 143 | Policy CN2 - Chipping Norton Sub-Area Strategy  
Policy CN2 (MM143) should be amended to propose 1,530 homes including 600 at Tank Farm.  
Figure 9.14 (MM144) should be amended to reflect the revised proposal. |
| MM752        | Bloombridge             | Bloombridge    | Mr               | Cutler            | 1969       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 143 | Policy CN2 - Chipping Norton Sub-Area Strategy  
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| MM752        | Bloombridge             | Bloombridge    | Mr               | Cutler            | 2001       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 143 | Policy CN2 - Chipping Norton Sub-Area Strategy  
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Figure 9.14 (MM144) should be amended to reflect the revised proposal. |
| MM753        | David Wilson Homes Southern | David Wilson Homes Southern | c/o Barton Willmore | 2002       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > MAIN 143 | Policy CN2 - Chipping Norton Sub-Area Strategy  
Policy CN2 (MM143) should be amended to propose 1,530 homes including 600 at Tank Farm.  
Figure 9.14 (MM144) should be amended to reflect the revised proposal. |
| MM105        | Adrian Smith            | Dr              | Smith            |                  | 268        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Chipping Norton Sub Area > | I have a number of concerns with the proposed local plan:  
1. The extent of the proposed development will change the character of Chipping Norton. A 30% increase in the population over a short (15 year) time period is a major change. I believe the councils original proposal in the previous version of the local plan is more realistic.  
2. The traffic burden in the centre of Chipping Norton is already heavy, with HGVs being a particular concern. However, the proposed 'bypass' will not help with this as most traffic is from Evesham towards Oxford and Banbury (and vice versa). A new road from the Burford Road will therefore not |
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<td>MM157</td>
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<td>Declan Haverty</td>
<td>Mr</td>
<td>Haverty</td>
<td>342</td>
<td>MAIN 143</td>
<td>affect the bulk of the traffic passing through the town. Consequently, this road will cut into the countryside and further affect the character of the town without providing an great benefit. Instead I propose that HGVs be re-routed away from the town by means of (a) Road signage (as previously proposed by Oxfordshire County Council) and (b) a weight restriction on the bridge at Burford - thus preventing HGVs coming from Burford to Chipping Norton. These would provide a much cheaper alternative to a new road. 3. The current sewage and drainage infrastructure of Chipping Norton already overflows at times of heavy rain. It will need to enhanced in advance of any additional demand placed on it.</td>
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<td>MM315</td>
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<td>Richard Gwinn</td>
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<td>Gwinn</td>
<td>579</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 143</td>
<td>his modification increases significantly the number of properties to be built in the Chipping Norton SDA. This is backed up by unsound evidence and is not appropriate to the existing community. In particular: a) Part of the Vision in section 3.2 is to &quot;play a role in helping to meet wider needs, without significant change to the intrinsic character of the District.&quot; Increasing the population of the town by 50% will inevitably change its character. Especially as the driver for the increase is the need to house those working in Oxford, so turning a working town into a dormitory town. b) Core Objective CO2 is to &quot;Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.&quot; This fails for the same reasons as the Vision statement. c) Core Objective CO3 is to &quot;Promote safe, vibrant and prosperous town and village centres and resist proposals that would damage their vitality and viability or adversely affect measures to improve those centres.&quot; Whilst a modest increase in population will help the town, this huge increase, aimed at commuters into Oxford, will be detrimental. The plan mentions that the proposed development is within walking and cycling distance of the town centre, although it offers no evidence to support this. I visit the town centre most days and have never seen more than one bicycle in the cycle parking there. The area around the town is too hilly for most of the population to cycle. A straw poll of people living in the Parkers Circus estate (which is closer to the town centre than is the SDA) indicates that none walk when going into town to do their shopping. These were all fit, active people. The town centre is also not safe. In the last few years, people have been killed by passing traffic while on the pavement at Horsefair. The proposed link road appears to be a &quot;road to nowhere&quot; as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this...</td>
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<td>MM382</td>
<td>Chipping Norton Town Council</td>
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<td>Oliveri</td>
<td>824</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Chipping Norton Sub Area &gt; MAIN 143</td>
<td>relief road. This increase in traffic will also affect air quality, which is already at illegal levels. d) Core Objective CO4 is to “Locate new residential development where it will best help to meet local housing needs and reduce the need to travel.” Policy T1 – Sustainable Transport says that “Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.” The increase proposed in the modification is mainly to serve Oxford. There is no train link to Oxford. The bus to Oxford takes over an hour and is infrequent. The bus service from Kingham Station does not wait if a train is delayed, resulting in a possible two-hour wait for the bus that meets the next train. I see no solution to this problem as buses have to keep to timetables. Everyone I know has stopped using this bus, resulting in more car journeys and a station car park that can't cope. The alternative is to travel to the station by driving through country lanes and the village of Churchill in contravention of Policy T1. The increased local traffic will make air quality worse. There is nothing in the proposed plan to solve these problems. e) The proposed plan states in para 7.74 that “In Chipping Norton public car parking spaces in the town centre are insufficient to meet current needs.” There is nothing in the proposed plan to solve this problem. Chipping Norton is one of the highest towns in West Oxon and is built mainly on hills with narrow streets except for the main roads of M4 and A36f in places the underground infrastructure (overflowing sewers/rainwater drainage - shared system) is already creaking with too much use and the road problems we have are well documented and accepted as being unfit for purpose by OCCA/VODC with a serious air quality problem in the centre of town. It might also be worth mentioning here that when an OCC employee was recently asked 'how many of West Oxfordshires main A roads are fit for the very large HGV's we see nowadays?' The answer was 'none of them!' CHIPPING NORTON NEIGHBOURHOOD PLAN - on 3rd March 2016 a referendum was held in the town accepting the CNNP which was then adopted. In this plan it was mentioned in several places that any future development has to be sustainable and it is felt that whilst 600 homes on Tank Farm were possibly sustainable 1400 homes are not - please see notes 213141516 below. It is felt that WODC in their draft Local Plan entirely ignoring the spirit of the CNNP. In February 2014 the Town accepted that it would have to take some new houses and reluctantly agreed that 600 on the area known as Tank Farm (the south half of the SDA) could be acceptable subject to suitable planning and mix of houses and infrastructure. Little contact has been made since then except for a plan that was attached to a planning application in the nearby area in the middle of 2015. Nothing officially has been given since the meeting on 14th February 2014 until 23rd August 2016 when in a meeting between CNTC and OCC a plan using 800 homes plus 80 extra care beds was tabled and alterations suggested including no access at the southerly perimeter.</td>
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The next contact was the recent suggestion of 1400 houses. Considering that the allotment land to the south of the SDA is owned by the Town it seems strange that discussion about the possible purchase of any land requirement has not yet happened - for sake of absolute clarity the William Fowler Allotment land is not for sale.

We also get the impression that some pressure might have been brought to bear on local land owners to go along with OCC plans - and please bear in mind that the majority of the land we are discussing is owned by OCC - thank goodness there are some 'ransom sites' to protect the town from being totally overrun and spoilt.

We also feel that discussions with other stakeholders have not taken place - we back this statement up with the recent planning application at the Pillars which is adjacent to the northern edge of the SDA with no vehicular access which apparently shows no coherent masterplan. Chipping Norton Town Council totally reject the new local plan for the SDA for the following reasons in brief:

1) 1400 new homes on Tank Farm are not sustainable
2) The local employment of residents has fallen over the last 10 years and is now below 30%
3) The majority of local employment tends to be 'low paid' jobs in retail/catering and caring sectors
4) 'High paid' jobs i.e. professional or technical jobs tend to be in what is now-called the 'knowledge spine' which is difficult to access from Chipping Norton unless you drive as we have a poor train and bus service
5) Narrow and congested roads (including the main A441/A361 at Horsefair where the worst pollution in Oxfordshire has been ignored for many years by OCC and WODC. The best long term solution to Horsefair are the road improvements needed around the Rollright Stones, which have been discarded due to cost - now budgeted at £18 million by OCC's consultants
6) The cost of the Eastern Relief road has not yet been tabled but has to be close to the figures in 5)
7) The traffic figures being used from the survey carried out by WYG are erroneous - two points immediately stand out - a) it is stated that there have been no traffic related accidents in Horsefair in the last 5 years - we know that there have been 3 DEATHS in the period and b) it is stated that the busiest time of the day on Burford Road (A361) at Chipping Norton School (a large comprehensive 1200 pupils) is between 0700 and 0800, but in reality this is really 0815 to 0845.
8) We dispute the figures given to us by OCC and others which show that only 30% of the HGV’s that transit through Horsefair use the A361 towards Burford and a massive 70% use the A44 east and west towards Oxford/Moreton-in-Marsh/Evesham and the 4361 north to Banbury.

We have been advised by independent traffic consultants that the figures are probably nearer to 15% respectively 85%. We therefore consider the Eastern Relief Road to be ill-advised
9) An independent expert has recently been shown our traffic problem and has walked around the town and agrees with the Town Council that a one way system using Albion Street and the High Street would go a long way to deter HGV’s and improve the air quality, ease congestion and add
The major change to the Local Plan for Chipping Norton is the increase from 600 to 1,400 homes (almost a 250% increase) at the East Chipping Norton Strategic Development Area (ECNSDA), known locally as Tank Farm - reference: MAIN 136 to MAIN 144 inclusive.

There is also a new proposal for an ‘eastern link road’ which is also covered in changes MAIN 136 to MAIN 144 to the Local Plan.

CPRE wishes to raise objections to these proposed changes on the following grounds.

Air Quality

WYG were appointed by Oxfordshire County Council to prepare a strategic Chipping Norton Transport Options Study (CNTOS).

This study concluded that ‘Given that an existing AQMA is already declared in this location, it might be reasonable to conclude that all development options would be likely to exacerbate air quality management issues’ (paragraph 11.1.6 of the report). The building of 1,400 homes at Tank Farm was one of these development options. The report also notes ‘in each case predicted traffic volumes on the A44 High Street / Horsefair corridor would be expected to increase reasonably substantially over and above the 2016 surveyed flows, exacerbating existing environmental degradation (notably air quality issues) within the town centre(paragraph 10.1.2).

The study also attempted to ‘identify potential mitigation measures that would offer realistic scope to both accommodate development and help to mitigate the impact of this development and existing environmental issues within the town centre, notably associated with the declared AQMA on the A44 High Street / Horsefair (plus the southern section of the A361 Banbury Road and West End)’ (paragraph 9.1.3).

The report concludes that 'the three outline schemes assessed (the Rollright bypass, central area zonal weight restriction and town centre gyratory) would likely be unsuitable mitigation options for a variety of reasons including preclusive cost, lack of likely effectiveness and / or unacceptable knock-on impacts’ (paragraph 10.6.1).

The transport consultants employed by OCC and WODC therefore believe that the ECNSDA would worsen air quality management issues in the centre of Chipping Norton and that the 3 possible mitigation schemes to reduce the air pollution are not viable.

The existing AQMA has been in operation for many years and no solution has been found to this problem. The existing levels of air pollution in the centre of Chipping
Norton are already adversely affecting the health of people living and working there. Yet WODC is proposing to build new houses in Chipping Norton which will worsen air pollution and increase the risk to health of people in centre of the town without having a viable strategy for reducing these levels. It could be argued that NO ADDITIONAL HOUSING should be allowed until a workable solution to the existing air quality problem is devised, implemented and shown to be effective.

Road Safety

Road safety issues in the centre of Chipping Norton are very closely connected with the problem of air pollution: both are caused by modern levels of traffic trying to get through an ancient market town the central area of which was originally laid out in the 13th Century.

Horse Fair is the narrowest part of the A44 as it passes through the town. Here the road is narrow as are the pavements. This puts vehicles and pedestrians into close proximity. It has been the site of several fatal accidents in recent years. Road safety concerns are not restricted just to the Horse Fair. Local people also know that it is becoming increasingly difficult to cross several of the roads in the town centre safely because of the increased volume of the traffic as well as vehicles being driven at speeds inappropriate for the town centre.

The Local Plan accepts the need for the Council to 'address the relatively high rate of fatalities and serious injuries on the District’s road network' (paragraph 2.40). Work needs to be carried out to identify measures to improve safety in Horse Fair and other areas within the centre of the town. It also needs to be identified how these improvements will be funded. Again all of this work needs to be carried out before significant development is allowed to go ahead at the ECNSDA.

Traffic

The increase from 600 to 1,400 homes at the ECNSDA has profound implications for traffic in Chipping Norton and the surrounding area. The Chipping Norton Transport Options Study informed the preparation of the latest version of the Local Plan and in particular supported the option for 1,400 homes at the ECNSDA together with the Eastern Link Road. This option is of course the major change from the previous version of the Local Plan for Chipping Norton and is referenced in MAIN 27, MAIN 136 and MAIN 138 to MAIN 144 inclusive. This section of these comments outlines some concerns in a number of areas concerning traffic and arising from these changes to the Local Plan:

· Other traffic related comments

The way the Transport Options Study was carried out

The Transport Options Study report is an important document which played a major part in influencing the decision to put forward the 1,400 homes at the ECNSDA option in the Local Plan. Important decisions are to be made with respect to the future of Chipping Norton based on the findings of the study. Does a study which was principally carried out on one day only provide sufficiently robust and accurate
data on which to base these crucial decisions?

The manual traffic counts and the ANPR surveys were carried out on a Tuesday in March and were intended to assess “normal” traffic conditions. However there are times of the week when traffic in Chipping Norton tends to be heavier than normal principally Monday mornings and Friday afternoons. Also Wednesdays tend to be busier because of the weekly market. Why weren’t the surveys carried out during these busier times of the week?

In the summer many visitors and tourists come to Chipping Norton or pass through it on the way to see the Cotswolds or to visit major tourist attraction such as Blenheim Palace. There are not many tourists or visitors who choose to come to the area in early March which is when the traffic surveys were carried out. In the spring and summer there is also likely to be an increase in HGVs travelling to and from the fruit and vegetable growing areas in Worcestershire and other areas to the west of the town. Why wasn’t the traffic survey work repeated again say in June in order to assess whether the traffic levels are significantly higher at that time of year?

The ANPR count locations were positioned such that they may have missed a substantial amount of local traffic within the town e.g. parents living in the areas off West Street/Churchill Road taking children to the Chipping Norton School and local residents driving into the centre to shop.

The findings of the Transport Options Study

The Transport Options Study report paints a bleak picture of what will happen to traffic in Chipping Norton if 1,400 homes are built at the ECNSDA even with the proposed Eastern Link Road:

* Increased traffic through Chipping Norton as outlined in paragraph 11.1.21 of the report:

"However, delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031 (both resulting from development on the Tank Farm site and general background growth on the network anticipated by this time). Furthermore, the beneficial minimisation of additional traffic flows on the A44 High Street would come at a cost of increasing traffic on peripheral routes around the town resulting from a combination of redistribution and the increased level of development on the Tank Farm site."

* The report also reports that this option “would be likely to exacerbate air quality management issues” – paragraph 11.1.15.

* The health of residents and people working in the centre of Chipping Norton would be put further at risk – see section CN4 above.

* Three mitigation options were examined and all were judged to be unsuitable for a variety of reasons – paragraph 10.6.1
In addition the study reports that the computer modelling of future traffic flows predicts that 2 of the main junctions in Chipping Norton would “operate well in excess of their theoretical capacity” and that the other 3 “would all remain operating within or, worst-case, at capacity for all of the potential development scenarios” – paragraph 11.1.16.

The report goes on to say that the computer software used may underestimate the capacity of roads in towns such as Chipping Norton and seeks to compare them with roads in other towns. The conclusion at this point is that “the operational impact of additional traffic flows resulting from each of the development scenarios on the existing network might be far less onerous than the model results indicate” - paragraph 11.1.17. At the very least this suggests that the future performance of the main road junctions within Chipping Norton are difficult to predict and that if the computer modelling turns out to be correct then two of those junctions will be operating well above their capacity.

Other traffic related comments

The Transport Options Study calculated ‘the estimated delivery costs of upgrading an existing route via Rollright Lane and the A3400 to the north of the town to act as an east-west bypass of the town serving as an alternative for through-movements of traffic on the A44’ – paragraph 10.3.3 and Figure 31.

The study report then goes on to say that ‘this option was considered unviable on the grounds of cost’ - paragraph 11.1.18.

However neither in the Local Plan nor in the Transport Options Study report is there any calculation of estimated delivery costs of the proposed Eastern Link Road. This seems a surprising omission as it makes comparisons between the 2 schemes impossible. It leaves unanswered the question of whether the funding for the proposed Eastern Link Road would be better spent on the upgrading of the Rollright/A3400 route.

Paragraph 9.4.40 of the Local Plan (MAIN 138) contains the statement with reference to the proposed 1,400 homes and the Eastern Link Road: ‘….. there could also be a diversion of a large proportion of HGV movements from Chipping Norton Town Centre, thereby possibly having a beneficial effect in terms of improving air quality - a key issue for the town.’.

A similar claim is made in paragraph 9.4.56 (MAIN 142). But doesn't the Transport Options Study for Chipping Norton conclude that ‘delivery of the new eastern distributor road as a stand-alone measure would be insufficient to fully off-set and mitigate the impact on the town centre of the traffic growth anticipated by 2031’ (paragraph 11.1.21)?

The Transport Options Study report also concludes that this option “would be likely to exacerbate air quality management issues” - paragraph 11.1.15.

Chipping Norton has been waiting for a solution to its traffic related problems for decades:
* The use of the Rollright/A3400 route to remove traffic for the centre of the town has been in discussion for many years.

* The town has been experiencing severe air quality issues and the associated detrimental effects on people’s health for at least a decade.

* An AQMA for the centre of Chipping Norton has now been in operation for over 8 years with no significant remedial action being taken.

* The same area covered by the AQMA is also an accident blackspot with a record of a fatal accident every 12 years and a serious RTA every 2 years on a stretch of road that is only about 200 metres in length.

* All the time traffic through Chipping Norton increases and these problems get worse.

When the latest version of the Local Plan proposes a huge increase in the number of houses in the town would it not be reasonable to expect that the document would propose measures which would alleviate Chipping Norton’s traffic related problems. However all that is offered is a proposal that will in fact increase traffic in the town with all the consequent detrimental effects of this including a predicted worsening of the air quality problems. Is it unrealistic for the town’s residents and visitors to expect a better solution than this?

Car parking

Local residents as well as visitors are well aware of the current problems with regard to car parking in Chipping Norton. This is recognised in the Local Plan: ‘The availability of adequate public parking capacity is a key constraint in Chipping Norton’ (paragraph 9.4.30) and ‘Improvements to the efficiency and availability of public car parking in Chipping Norton will be sought as appropriate’ (paragraph 9.4.60).

The Local Plan states: ‘The scale and mix of uses in the local centre would be intended to meet the needs of the development and not compete with the Town Centre’ (paragraph 9.4.49). This presumably means that a large proportion of the people living in the proposed ECNSDA would use the town centre shops together with the Aldi store to do their main shopping.

A few people may walk, cycle or use public transport when shopping in the centre of Chipping Norton. However given the distance especially from the far parts of the ECNSDA to the town centre together with the fact that there would be a hill to climb on the way back most people will use their cars when shopping in the town and especially if doing a large weekly shop.

The increase in the number of homes in the ECNSDA from 600 to 1,400 will therefore increase significantly the need for extra car parking in the town centre. Land in or adjacent to the town centre is very scarce in Chipping Norton. Before
School capacity

The Local Plan recognises the need for significant increases in school provision if the enlarged ECNSDA goes ahead: ‘it is a requirement of any proposed development on this site that a new primary school will be provided. The site is close to the existing secondary school where there is adequate capacity to absorb additional pupil numbers despite the increased size of the allocation’ (paragraph 9.4.48).

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean that the population would increase by around the same percentage. It is also appropriate to assume that the number of school age children would rise by around the same order of magnitude requiring a new primary school approaching the size of the existing primary schools added together. Chipping Norton School would also have to almost double its existing size. The main issue with regard to increasing school capacity at both the primary and secondary levels would appear to be ensuring that adequate funds are available to carry this in time to cope with the increased demand – see below for a discussion of the funding requirements of the enlarged ECNSDA.

Meeting the housing needs of local people

One of the Core Objectives identified in the Local Plan is: ‘CO4 Locate new residential development where it will best help to meet local housing needs and reduce the need to travel’ (paragraph 3.7).

Locating 1,400 homes at ECNSDA does not support this Core Objective. Presumably the 600 homes proposed in the previous version of the Local Plan were felt to be adequate to meet local housing needs. The occupants of the additional 800 homes will presumably move into the area from outside and many of those of working age will commute to work thus directly working contrary to Core Objective 4. Moreover many will travel to work by car and thus increase pressure on roads locally.

Ensuring Chipping Norton retains its special character as a Cotswold market town

The Local Plan recognises the special character of Chipping Norton:

‘Chipping Norton will strengthen its role as a centre of enterprise in the northern part of the District. It will continue to be an economically and socially strong market town serving the needs of a large rural area. Its distinctive historic character and fine setting will be conserved and enhanced at the same time as accommodating new development to meet identified needs.’ (paragraph 3.2)

The overall housing requirement (2,400) represents an 80% increase in the number of houses in Chipping Norton and would mean the population would increase from around 6,500 to almost 12,000. Similar towns locally which have seen this scale of growth have changed fundamentally and such a growth in population over a
relatively short time period must put at risk the special character of the town. Although provision has been made for an additional 9 hectares of business land it is unlikely that sufficient new jobs will be created in the town to support the majority of the people of working age living in the new homes in the ECNSDA. The Local Plan notes that 'the number of people living and working in the town has fallen from 50% to 36% since 2001' (paragraph 9.4.30). Undoubtedly that percentage will fall further if the current proposal to build 1,400 homes goes ahead.

The danger is that Chipping Norton will become more and more a dormitory town for people working in London, Oxford and other places and that this will alter its fundamental character.

Resisting pressures for an out of town supermarket

With the likely increase in the population consequent on the building of 1,400 new homes in the ECNSDA it is surely only a matter of time before one of the major supermarkets puts forward plans for a large new store on the outskirts of Chipping Norton.

Places such as Witney have been able to build large supermarkets sufficiently close to the town centre that the new stores complement and support the town centre. There is no such site near to the centre of Chipping Norton.

Any large supermarket proposed in the future for Chipping Norton would be so far from the town centre that it would have a serious detrimental effect on the shops and businesses there.

There is real concern that WODC would not be able to prevent a future scheme for a large out of town supermarket going ahead given the significantly increased population and the financial and legal resources available to a major supermarket chain.

The Local Plan recognises this threat: 'Chipping Norton is the main focus for retail and leisure activities within this sub-area. The town has a strong and diverse retail offer but remains vulnerable to out of centre development. We will through the Local Plan therefore seek to safeguard and reinforce the role of Chipping Norton Town Centre' (paragraph 9.4.61). However there is no explanation of how pressures for 'out of centre development' will be resisted and this remains an area of real concern for local people given the plans to build so many new homes in the town.

Funding of measures to lessen the impact of the ECNSDA

Several areas will require significant investment if the current plans for the ECNSDA go ahead including:

* Measures to reduce air pollution
* Improvements to road safety in Chipping Norton
* New road
* Other improvements to roads in and around the town
* Extra car parking
* Improving conditions throughout the town and surrounding areas for pedestrians and cyclists,
Including accessibility to bus and rail services
- New primary school
- Significant expansion of secondary school
- Mitigation measures for the impact on the Conservation Target Area (CTA) and the SSSI

Not all of this will come from developer funding. We are also in a time of reductions in council funding and economic uncertainty in the post Brexit era. In addition it has to be taken into account that there will be large demands for funding in all areas of WODC where substantial house building is proposed. It is therefore legitimate to ask: where will the rest of the funding will come from in order to ensure that the building of 1,400 homes in the ECNSDA does not have major negative impacts on the town and its surrounding area?

If there really is a need for 1,400 new homes in the ECNSDA then market forces will ensure that developers and building firms will go ahead and build the houses. A real concern to local people is that the houses will be built but funds will turn out to be insufficient to ensure that the measures outlined above can be.

### SECTION 9 – EYNSHAM WOODSTOCK SUB AREA

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<td>Commercial Estates Group</td>
<td>1156</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL  &gt; Eynsham Woodstock Sub Area &gt; MAIN 145</td>
<td>We support paragraph 9.5.1 which identifies Long Hanborough as one of three main settlements within the Eynsham – Woodstock Sub Area. This is wholly appropriate given the range of services available at Long Hanborough and the location, at the eastern end of the village, of one of the few mainline railway stations in the District. Paragraph 9.5.3a We object to Paragraph 9.5.3a which now states that Long Hanborough has a ‘limited role’ and is only suitable for ‘very modest levels of further development’. As set out in detail in our representations to Policy OS2 Long Hanborough is, on the Council’s own evidence, a ‘Rural Service Centre’. It is a Rural Service Centre that has in fact become more sustainable in recent months with the consenting of additional residential development which will also deliver significantly enhanced doctors’ surgery and primary school provision. The settlement is even more sustainable now than it was when the Local Plan was originally drafted. Furthermore, as recognised elsewhere in the Local Plan, Hanborough Station is one of the key transport nodes in the District, has seen substantially increased levels of patronage in recent years, and from 2018 GWR proposes a greater frequency and capacity of trains from this station, which will only add to its importance and the demand for its services. As such it is wholly illogical for the Council to now suggest that Long Hanborough is less sustainable than it was, or that its role should be more limited than it was. In fact, quite the opposite is true. The Council’s own SHELAA confirms that land adjacent to Hanborough Station is available, which is located both outside the AONB and the Green Belt, and it would be wholly appropriate for the village to accommodate materially higher levels of development in the context of the materially higher level of housing required in West Oxfordshire.</td>
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<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1728</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL  &gt; Eynsham Woodstock Sub Area &gt; MAIN 145</td>
<td>The historic character of Woodstock needs to be considered in any planned development. Also, growth should not be such that the lion's share of the town is in Cherwell District, as has been proposed by past development initiatives. It’s vital that Woodstock with all its charm remains part of West Oxfordshire.</td>
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<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
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<td>1858</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL  &gt; Eynsham Woodstock Sub Area &gt; MAIN 145</td>
<td>MAIN 145 sets out the appropriateness of Eynsham to accommodate additional residential development, particularly due to its proximity and connections to Oxford and also because of the size of the settlement. We support this modification, we agree that Eynsham is a sustainable and appropriate location for growth and we note that this approach is supported by the Sustainability Assessment Addendum which states: “Thus, taking into account the proximity to Oxford and the Oxfordshire knowledge spine, together with the relatively good level of public transport available, two new strategic options for potential growth were identified.” (Para 3.12) The Sustainability Assessment Addendum provides a robust assessment of the proposed allocation to the</td>
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west of Eynsham, we agree with the conclusions of this assessment and consider it represents a justified and sound assessment of the proposed future growth.

Regarding Eynsham’s “proximity and connections to Oxford City”, are you really happy for Eynsham and the Garden City to become commuter belt suburbs? As you point out in paragraph 9.5.11, around 30% of workers in this sub-area already commute to Oxford, which “contributes towards traffic congestion along key routes including the A40 and A44”.

Proposed modification - Downgrading of Long Hanborough: The proposed modifications involve the downgrading of Long Hanborough from a service centre, to a lower order village. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN13, MAIN14, MAIN15, MAIN59, MAIN66, MAIN145, MAIN149.

Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.

We object to proposed modifications which suggests the downgrading of Long Hanborough from a rural service centre to a village. The submission plan confirmed the rural service centres were classified as such because they benefited from a range of services and facilities which supported the village and surrounding area. They are able to support additional homes in the short-term, while proposed growth can enhance the role of the settlement in supporting the surrounding rural area (paragraph 4.18). This approach was directly in line with the plan’s objective 1 ‘strong market towns and villages’ and objective 4 ‘sustainable communities with access to services and facilities’, both of which remain un-modified.

Long Hanborough retains the same services and facilities which existed at the time the plan was submitted, furthermore planning permission has been granted which allows significant expansion of the primary school (15/03341/FUL). While additional housing has been permitted no evidence has been produced to suggest additional homes would result in any harm to the character or sustainability of the settlement. The village therefore remains well placed to fulfil the role of a rural service centre.

The downgrading of Long Hanborough proposed through modifications is largely unexplained and not supported by any evidence. The Council cite the creation of a ‘new’ service centre through the northern expansion of Eynsham as justifying the downgrading of Long Hanborough as the new development will need to “develop a critical mass of services and facilities” (paragraph 2.5a).

We are concerned the Council’s explanation suggests an intention to restrict the development of Long Hanborough and reduce services in the village in order to encourage their replacement in the new development. A restrictive approach to development stifling an existing sustainable settlement and vibrant community is clearly at odds with the Plan’s vision, policies of the NPPF and good planning practice.

The provision of an additional service centre would be entirely in line with the Plan objectives. If the development proposed north of Eynsham is to proceed it is clearly preferable that Long Hanborough maintains its status as a service centre complementing any new facilities created. The need to retain the service centre is particularly pronounced due to the unclear deliverability of the proposed site north of Eynsham, even if the site is delivered this will not be until the latter part of the plan period, therefore there is a need for services and facilities in the interim.
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<td>Cantay Estates</td>
<td>1954</td>
<td>MAIN145</td>
<td>The submitted plan set out clear objectives which the following policies sought to deliver sustainable communities. The Council seeks to deviate from this approach without explanation, evidence or proper assessment, we therefore believe this modification should be deleted.</td>
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<tr>
<td>MM71</td>
<td>JSBWx2</td>
<td>Mrs Thompson</td>
<td>205</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 145</td>
<td>I do not have enough knowledge to know whether the proposed modification is legally compliant or whether is complies with the duty to co-operate. I don't consider it sound as there are too many contradictions.</td>
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<td>As an Eynsham resident, it very difficult to take in the enormity of your sudden change of planned direction, which, given the amount of time you have considered it, cannot but be ill thought out. Nor could it be said to enhance Eynsham in any way.</td>
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<td>You speak about protecting the historic centre of Woodstock in 5.21a but you make no mention of the historic part of Eynsham. Eynsham is unusual in having a fully documented history from the Stone Age. The administrative part of the Medieval court was held in Eynsham when the King was at Woodstock and the Abbey located behind the parish church. Regular markets were held in the Square.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 145</td>
<td>I think Eynsham’s conservation area was designated in the early 1970s but it has never been revisited by the planning department, as it has other West Oxon communities.</td>
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<td>Eynsham does not have an urban centre, barely a village one, but in 7.43d you speak of an urban extension to a village! Adding a further 1000 houses to the west without considering this, speaks volumes on your lack of thought.</td>
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<td>Eynsham is still to be a rural service centre and then you propose a garden village as a new service centre right next to it. Are you proposing twin towns?</td>
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<td>Among your core objectives are CO13, 15 and 16. How can a further 2,800 houses, industrial park etc in one area achieve these? Especially air quality when you are considerably adding to the 30,000 vehicles which use the A40 every day. The more time the vehicles are moving slowly or are stationary can only contribute more air pollution.</td>
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<td>The garden village will have to be particularly carefully planning for flooding as all the storm water from the Long Handborough–Church Handborough area filters through the river terraces to the Thames. Eynsham stands one a gravel river terrace and the storm water from the old part of the village filters through to the river in the same way.</td>
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<td>Expansion of the Cuckoo Lane site is fine as long as you make sure it has proper sewage and other services, as passing by a couple months ago on a walk the stink of sewage from the local stream was very unpleasant and cannot be good for the environment.</td>
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<td>More though needs to be put into how the health needs of the residents of Eynsham, the new garden village,</td>
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This is a written Response to the Public Consultation on the Amended WODC Local Plan 2031 by Professor Emeritus John Dowling, of the J R Smith School of Business, Queen’s University, Canada and Sometime Visiting Fellow, Templeton now Green Templeton College, University of Oxford, resident at 126 Dovehouse Close, Eynsham OX29 4EY

Introduction

As Eynsham residents, we are being invited to respond to a WODC consultation on a plan so far reaching and complex that it necessarily simultaneously engages with every level of local government from the DCLG, the County, this and other districts to innumerable Neighbourhood plans in various stages of development. This means that the various interdependent functional areas - transportation, housing, mineral extraction, education, medical care and so on - operate within different if overlapping jurisdictional competences and procedures. At the same time, the whole structure of local government is undergoing an immense renewal and reform with such bodies as the Oxfordshire Local Enterprise Partnership and the Oxford Growth Board forming a template for the economic planning of the County based on the incorporation of the universities, local government as a whole and commercial business-led regional economic development. All of this takes place within a DCLG-led policy of County-wide amalgamation of County and District Councils in a Unitary Authority which will be supported by grants from central government tax raising powers and possibly, in time, the issuance of unitary authority long term bonds. These powerful incentives will have to address the current stand-off between the County and the City and District Councils over paramountcy in the future unitary authority if these incentives are to be won. Thus, here in Eynsham and West Oxfordshire generally, we are being asked to work within a structure of local disaggregated government which is itself in the process of change and transformation to reflect a new and highly controverted governance.

Eynsham in the new political economy

The particular problem faced by Eynsham in this emerging politically-emerging restructuring is shaped by two overwhelming realities: firstly, that the changes proposed are transformative in scale and character and secondly that Eynsham despite its prominent strategic role in the Oxford-centred economic development (e.g an expansion in the first phase of 250% in its housing) is relatively modest in its present political influence in the contexts of both the WODC and the County governance. This sense of relative impotence is raised to shock and near paranoia by its being talked of that Eynsham is possibly being transferred from the District to the City if one of the PwC options for unitary government is adopted in such a way as to permit its needs becoming for WODC someone else’s problem and for the highly pressed City an expense and perhaps lower priority they may be unlikely to address. This pessimistic scenario may lie behind the extreme language in the Eynsham Society letter calling upon the DCLG to not fund the Garden Village Expression of Interest. It might even give rise to a hope that the whole local Plan can be scuppered along with the GV EOI.

I think it fair to say along with Mrs Fletcher, past Chair of the Eynsham Society and past Hon Secretary of the CPRE, that “this is the biggest thing to hit Eynsham in a hundred years” and it represents a change in the way some see the Village and its place in Oxford and Oxfordshire’s economic development. Eynsham, in my view, has had three major phases in the past century or so: its ferry and then road crossing of the Thames west of Oxford and the coming of the canals made it an important and lively commercial centre important enough to have its own courthouse; later industrialization and the introduction of motor transport rendered the village

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<td>John Dowling</td>
<td>Professor Dowling</td>
<td>Dowling</td>
<td>444</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 145</td>
<td>Long Handborough, North Leigh and Freeland are met. No mention has been made of the effect of a unitary authority for Oxfordshire. This is a written Response to the Public Consultation on the Amended WODC Local Plan 2031 by Professor Emeritus John Dowling, of the J R Smith School of Business, Queen’s University, Canada and Sometime Visiting Fellow, Templeton now Green Templeton College, University of Oxford, resident at 126 Dovehouse Close, Eynsham OX29 4EY Introduction As Eynsham residents, we are being invited to respond to a WODC consultation on a plan so far reaching and complex that it necessarily simultaneously engages with every level of local government from the DCLG, the County, this and other districts to innumerable Neighbourhood plans in various stages of development. This means that the various interdependent functional areas - transportation, housing, mineral extraction, education, medical care and so on - operate within different if overlapping jurisdictional competences and procedures. At the same time, the whole structure of local government is undergoing an immense renewal and reform with such bodies as the Oxfordshire Local Enterprise Partnership and the Oxford Growth Board forming a template for the economic planning of the County based on the incorporation of the universities, local government as a whole and commercial business-led regional economic development. All of this takes place within a DCLG-led policy of County-wide amalgamation of County and District Councils in a Unitary Authority which will be supported by grants from central government tax raising powers and possibly, in time, the issuance of unitary authority long term bonds. These powerful incentives will have to address the current stand-off between the County and the City and District Councils over paramountcy in the future unitary authority if these incentives are to be won. Thus, here in Eynsham and West Oxfordshire generally, we are being asked to work within a structure of local disaggregated government which is itself in the process of change and transformation to reflect a new and highly controverted governance. Eynsham in the new political economy The particular problem faced by Eynsham in this emerging politically-emerging restructuring is shaped by two overwhelming realities: firstly, that the changes proposed are transformative in scale and character and secondly that Eynsham despite its prominent strategic role in the Oxford-centred economic development (e.g an expansion in the first phase of 250% in its housing) is relatively modest in its present political influence in the contexts of both the WODC and the County governance. This sense of relative impotence is raised to shock and near paranoia by its being talked of that Eynsham is possibly being transferred from the District to the City if one of the PwC options for unitary government is adopted in such a way as to permit its needs becoming for WODC someone else’s problem and for the highly pressed City an expense and perhaps lower priority they may be unlikely to address. This pessimistic scenario may lie behind the extreme language in the Eynsham Society letter calling upon the DCLG to not fund the Garden Village Expression of Interest. It might even give rise to a hope that the whole local Plan can be scuppered along with the GV EOI. I think it fair to say along with Mrs Fletcher, past Chair of the Eynsham Society and past Hon Secretary of the CPRE, that “this is the biggest thing to hit Eynsham in a hundred years” and it represents a change in the way some see the Village and its place in Oxford and Oxfordshire’s economic development. Eynsham, in my view, has had three major phases in the past century or so: its ferry and then road crossing of the Thames west of Oxford and the coming of the canals made it an important and lively commercial centre important enough to have its own courthouse; later industrialization and the introduction of motor transport rendered the village</td>
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something of a backwater while retaining a strong local sense of identity as a rural centre for services. Gradually it attracted retirees and professionals and this gave rise to a strongly protectionist stratum, often well educated and experienced, who through the Eynsham Society formed a preservationist component alongside the Village’s Parish government. The preservation mantra revolved around two main themes: one was the idealisation of the natural ancient rural way of life, a sort of pre-lapsarian shared illusion, and the second was to seek to protect the rural idyll behind the inadequate infrastructure, notably the Toll bridge over the Thames and more latterly the congestion on the A40. It is this exclusive view that has been shocked by the power of the new regional economic policy, the scale of the expansion which, should it reach the 10,000 houses permitted by the Garden Village prospectus, would sextuple the present population.

However, as someone who lived at Stanford for most of the seventies, I saw the origin of the new economy base of the commercial development of Silicon Valley at its inception and in Stanford, MIT, Caltech, UCL and Cambridge we see centres of the Witty plan to focus national economic development around eighteen major universities of which Oxford is one. The role of linking the intellectual human potential in the best universities to their regional economies is the core of industrial strategy and it has to be recognised that this is crucial to the funding of the universities themselves (doesn’t Stanford own half the royalties of Google and other world wide companies?) Thus as an addition to the historic sources of income from land, to public funds, they now must look to the economic development of their intellectual labour. This phase incorporates Eynsham within the ambit of the Universities in the case of Oxford supported by funding from the City of £300m and the work of Oxford Science Innovations just as the Village was in earlier days before another Reform, within the ambit of the Abbey itself living in large part on its intellectual labour.

These then are some of the problems facing Eynsham as we come to adapt to the new version of an old economic model.

What has been very encouraging in the context of these changes for the Village and in the structure of the whole of local governance is that the Chair of the Eynsham Parish Council, Councillor Gordon Beach, convened a Public Meeting of the Chairs of the OXLEP, the County and District Councils and a senior official of the City. What is notable about this is that we had in the same room high representatives of the bodies that jointly will have to plan and implement the plan for Eynsham and if they can do so or maybe have imposed upon them, form a Unitary Authority. But speaking positively, this body for the first time addressed or heard addressed perhaps, the scale of change and some if not all of the problems facing Eynsham, should possible political neglect through a careless transfer of Eynsham from District to City occur. This Meeting revealed both the shock to the romantic idyll idealised by some, and the actual potential of an investment-led future with Eynsham as a key part of the new economy of Eynsham, Oxfordshire and the national economy.

Implementation of the latter option is evident in the relationship of Eynsham to Oxford, of the new rail service to London and the proposed one to Milton Keynes and Cambridge. Eynsham offers then one of the best connected locations in the country at one of the points on the triangle Oxford, Cambridge, London and has the advantage of the Cotswolds to the west stretching to Bath and to the Severn Valley. Taken with the excellence of local education and the enormous need for housing for university, hospital, local government services and commercial employment, Eynsham is a central desirable location for inward investment and housing. Nor is this in any way alien to the character of the place where Siemens have developed a world provision of high technology based on low temperature physics and Polar Technology do the same in material science.

So to set out the difficulties in the current planning process is also to recognise the steps symbolised by the joint participation in the Public Meeting of the seriousness of the problems facing Eynsham and the resolution to address them.
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<td>MM275</td>
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<td>Marshall Leopold</td>
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<td>Leopold</td>
<td>488</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 145</td>
<td>I wish to record my objections to the proposed changes to the above draft Local Plan but also to the draft itself, as a whole, as it represents some of the worst applications of planning thinking and activity that could be operated in a large geographical area where good planning is required. If good planning is implemented, it will enhance the environment for current residents and create opportunities to sensitively accommodate many additional residents who need, or will need homes in the area. If bad planning is adopted, the result will be the damaging of many parts of West Oxfordshire by reason of panic decisionmaking. The further and most immediate consequences will be a poor built environment, gridlocked transport infrastructure, inadequate schooling at both primary and secondary levels and wholly inadequate medical and wider facilities and amenities. That will ensure current and future residents are forced to live in a far less amenable environment than is necessary and without the chance to preserve and enhance the community spirit that well planned...</td>
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But the rural idyll school have a point; when after the meeting I read the Eynsham Society submission, I found we both stressed the sensitive hydrology where we live in a sweep of the river that already has a large flood plain, which gave rise to a case at the Court of Appeal. It has to be recognised that the altered and increased run-off may alter the path of the five tributaries flowing into the river at this point and therefore affect the flood plain adversely. We must set a limit on the spatial distribution of housing that takes account of the sensitivity of the local hydrology.

Similarly, the impact of so great an increase in population will call for addressing the issues of congestion in transportation. The Wolvercote redesign is very helpful but the plan for a car park and a one way easterly bus lane might solve some of the present congestion as might a small westerly bus lane at the Cassington lights but these will only alleviate existing congestion to some degree and the large investment in employment and population surely call for a high tech solution. I remain wedded to a reversible or tidal bus lane - it is relatively low cost, it is economical of road space and while it calls for safety barriers and direction indicators this is well within the budgetary scale appropriate to the increasing population and the tax revenues that it will bring leaving to one side the funding possibilities linked to Unitary local government. A progressive improvement of the congestion from new housing will need to be reflected in a greater mass transport capacity. The problem of the Swinford Bridge calls for a new bridge with presumably the buy out of the present owner’s rights but as the amortisation of such a charge could be very long, it is not so inconceivable.

But I leave to last the key point, which is that it cannot be that Eynsham become an orphan parish consigned to the unkind care of commercial piecemeal developers. The virtues of the Garden Village EOI are three and they must be retained: firstly it provides for planning in depth, secondly it makes explicit inward investment in a Science Park, and thirdly, that it is provisional so that if granted, an open ended reconsideration of its location can be considered in depth. Can this be done pending the as-yet unresolved unitary government? Can the scale of both the changes and the possibilities be appreciated and genuinely resolved? Can we become a star of the newly emerged economy, rather than a black hole? I believe if we take sufficient care, we can. The key is that there should be in depth planning funded by the Garden Village if possible, and, if not, raised by an ad hoc consortium raising funding jointly consisting of OxLEP, OGB, and the County, District and City acting together, if necessary, anticipating the establishment of the Unitary body. Can the problems of Eynsham, acute as they are, be resolved as a special case in joint proto-unitary planning?

Respectfully submitted

John Dowling, Ph D

N.B. in the spirit of the Public Meeting and recognising the depth of the risks we face and therefore the breadth of co-operation upon which we now depend, I am copying these thoughts to all of the bodies concerned.
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<td>My comments are particularly addressed to the sections of the draft Local Plan relating to Eynsham and land to the north and west of the village.</td>
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<td>Eynsham suffers high land and housing cost by reason of its attractive and thriving community, a very beneficial environment for living and its good facilities. It needs to grow and as part of a Neighbourhood Planning process, the community has shown a considerable willingness to see growth of the right kind that delivers the type and nature and style of growth that emulates the existing situation and ensures that what we have is not damaged and what we achieve is an enhancement. The key to delivering such growth is that it should be carefully managed and husbanded in parallel with a series of infrastructure changes that will see the community and its growth move forward in a sustainable fashion. To achieve this, there needs to be a clear vision of what the local area will look like and how that will fit into a wider framework.</td>
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<td>Sadly, this draft Local Plan and the proposed changes consistently presents knee jerk reactions to external problems. It tables actions but fails to consider at all in many cases and wholly inadequately, in others, the consequences of what is being proposed.</td>
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<td>In particular, it is common knowledge and understanding that traffic on the A40 is log jammed in both directions (Eastward and westwards) at peak commuting times. Traffic on all other peripheral roads used as alternative routes are equally jammed. The Toll Bridge to the east of Eynsham, giving alternative access towards Oxford, is a constant obstacle for traffic movement. A proposal to create a 1000 space Park &amp; Ride at Eynsham with an incomplete bus lane eastwards is the only road enhancement envisaged to carry traffic east/west. It is possible that these improvements will make the current traffic position better although it even that is not certain. What is absolutely crystal clear is that building the additional housing growth west of Eynsham that is envisaged, will generate significant traffic flow eastwards and the most likely destination of that eastbound traffic (and westbound in the evening) will be past Eynsham and towards Oxford or via the A44/A34 or A40/M40. Thus traffic generated to the west will swamp any proposed infrastructure upgrades even before any development in or near Eynsham is taken into account.</td>
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<td>If one now adds the proposed growth of 2200 houses in the land north of Eynsham and the A40 plus a further 1000 houses to the west of Eynsham and increases those numbers as it becomes clear from the draft Local Plan that these numbers are merely the start, it is immediately self evident that a potential traffic gridlock is almost guaranteed to be established relatively quickly into even a slowly phased build out programme. Nowhere in the documentation is there any evidence that the planners have considered the implications of this infrastructure crisis in their sustainability assessments. On the contrary, there seems to be a simple but totally misplaced blind faith that all will be well. It is obvious that because there is no vision, they have opted for a &quot;solution&quot; that is big enough to perhaps be used as a lever to squeeze some infrastructure funding out of developers. However, nowhere is it evident that the planners have identified actions that could ameliorate the problems that they are about to create. Instead, it would appear that as with wider infrastructure issues and facilities, there is only a vague notion of what might be done and no clear and present intention to solve these issues commensurate with a specific plan to build 3200 plus houses in a very close geographical area.</td>
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<td>There is a reference to an additional primary school being created but (and putting aside whether Tilgarsley is a Garden Village or merely a large extension to Eynsham) no reference to equivalent medical facilities to support such a large number of new households. The present GP facility is good but stretched and they have indicated in a public meeting that they have real fears that the development that is proposed is far too large for the existing facilities to support (even if it expands) but the growth would not be large enough to sustain the Government funding tests to enable the creation of a new facility. Again, this is clear evidence that there...</td>
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is no vision, no understanding of the implications of the knee jerk growth proposal and no plan in place or even in contemplation to address it.

The current excellent secondary education facility in Eynsham could be grown to accommodate some of the extra demand from such a proposed housing growth. However, that is a further infrastructure factor and nowhere is it touched upon, let alone is it properly addressed.

As part of the thriving community of Eynsham, there is significant employment in nearby industrial parks. However, the workforce is largely concentrated within 2 major firms. Siemens struggles to recruit engineers in part because prospective employees physically cannot get to site because of road infrastructure problems. Indeed, much of the current industrial land near Eynsham is poorly developed and the primary reason is that road infrastructure is poor and business has voted with its feet to work elsewhere. The proposal to build a new Science Park on the A40 to the west of Eynsham as part of this Eynsham expansion is a further example of "cart before horse". More housing and more science based employment would be excellent for the village and the region. However, before embarking on growth, it is good practice to look at the building blocks that would make a success of such growth and, essentially, for it to be sustainable. The first is to be able to get to and from the buildings and housing. A second prerequisite is to deliver what is wanted and not an ill-considered, unfunded and totally unsustainable bundle of stuff that has only been conceived with a view to ticking a box on a list of deliverables that government has said must be contained within a Local Plan.

Government is right to require a wide range of issues to be addressed in a Local Plan. However, it is for Local planners to respond to by producing something that makes sense. This draft does not make sense. It is filled more by flaws than by genuine solutions.

Eynsham deserves far better than this draft because it is open minded to change and foresees and wishes to embrace growth. However, WODC has mistaken a willingness to look at sustainable growth that works in the context of a thriving exemplar community, as a justification to create a convenient dumping ground for all the insoluble problems that it has created for itself over past years through failing to properly address planning as a tool and an opportunity for real beneficial change.

For the above reasons, I would invite WODC to think again. If it fails to listen to the many concerns from Eynsham that it knows full well are heartfelt and substantively held, then it can expect resolute opposition when the Inspector comes to consider whether or not the draft Local Plan should be made. At present, in my view, it is not fit for purpose.

Regarding Eynsham’s ‘proximity and connections to Oxford City’, are you really happy for Eynsham and the Garden City to become Oxford commuter belt suburbs? As you point out in Para 9.5.11, around 30% of workers in this sub-area already commute to Oxford, which ‘contributes towards traffic congestion along key routes including the A40 and A44’.

I have now attended two consultation events in Eynsham, and I regret that I was unimpressed at the responses to our questions to the panel of representatives from the Local Authorities and the LEP on Monday 5th December. Our questions were met with buck-passing, and the only answers were either that it was too late to influence as had already been made (as in the case of the assessment of Oxford’s unmet housing need) or too soon as in the responses to all questions of detail about the proposed Green Village.
Eynsham Futures has worked tirelessly over many months and has been highly consultative and collaborative in its work on the Neighbourhood Plan ensuring that the proposals were explained. WODC were involved throughout. At the last public consultation there was an emerging consensus that well planned housing development was right in terms of meeting housing need and could be managed so that it enhances rather than damages the community of Eynsham. Although challenging, there seems to be a degree support for the Green Village provided the need for transport infrastructure is adequately addressed in advance, a proper green buffer between the two settlements probably reducing the overall number of homes, and retaining our proposals for 650 homes in Eynsham to meet local need.

Officers from WODC were consulted and involved throughout the Neighbourhood Plan process, but as we now know they had significant plans for the Expression of Interest for the Green Village that they did not share. Compounded now by the failure to address any of our valid concerns it is not surprising that the Eynsham community feels that our views are regarded as not relevant.

Scale and Infrastructure

The scale of developments proposed in and around Eynsham are totally disproportionate to the size of the existing settlements and with proposals for the the rest of West Oxon.

Eynsham is expected to accommodate 2,200 houses to the north and a further 1,000 to the west, more than doubling the size of the existing village. No other town or village is asked to approve developments on anything like that scale. It is not clear that all potential sites in West Oxfordshire have been rigorously assessed and it now seems that because our neighbourhood plan recognised the need for housing to meet local need we are now regarded as a soft touch. There is no reason why all of Oxford’s unmet need should be on one site. Witney and Carterton are both attractive places for commuters with bus routes.

I support the proposal for 650 homes to the west of Eynsham, with the criteria clearly spelt out in the Neighbourhood Plan in terms of quality, environmental concerns, and focusing on smaller units to meet identified local need. It is unacceptable to increase this to include Oxford’s unmet need.

The proposals - (or lack of) for the A40 are nothing short of astonishing. The congestion on the A40 has been recognised for years - as acknowledged by Cllr Huxpeth. The “solution” to the current problem is a bus lane going one way, but stopping short of the city. There are no proposals to meet the demands of ten years of construction, nor of an extra 4,000 households using the road.

This scale of development is completely unacceptable without significant improvements to the A40 in advance. Options for a light railway or tram (recognised as possibilities in last years OCC consultation) are written off despite the fact that the situation has totally changed. The minimum should be a bus lane in both directions, a high quality cycle path and the community path to Botley.

In Eynsham an extension to the bypass extending up from Station Road to meet the A40 is also essential to reduce traffic through the village and to cope with building on the west of Eynsham.

The principles of a Green Village demand that infrastructure needs are met but it is not clear that these will be in place from the start to meet the needs of initial residents. The impact on Eynsham’s schools, medical services shops etc have not been addressed.
The Green Village concept and practicalities

As is clear from our neighbourhood plan, the vast majority of people in Eynsham are concerned about housing need, and the difficulty that many local people, especially young people have in finding affordable housing in our area - both in Oxford and Eynsham. This is why Eynsham Futures are proposing significant new housing of 650 homes mitigating as far as possible the impact on the existing village. I support that proposal.

The assessment of the county's housing need suggests and growth of 50% without giving any proper rationale for this very high figure. It appears to be based on projections and economic arguments, ignoring social and environmental consequences, and heavily influenced by the two universities.

We have been given no evidence that such growth is actually needed particularly in the light of possible contraction of the car industry and Science research post Brexit. I do not understand how such an important decision can be made with no consultation at all. Furthermore the fact that the local districts agreed to it appears to mean that we can have no discussion or challenge the assumption that the new technological revolution is going to create a lot of jobs that need to be based on this particular area. Oxfordshire County Council and the Districts should review and consult on Oxford's unmet housing need given new economic forecasts.

Surely the Local Plan is the point at which these competing demands need to be balanced to take into account the interests of the local communities and the environment.

There is no evidence provided to support the notion of yet another science area as part of the Green Village, and if there is a clear identified need, surely a more appropriate brownfield site is the underused existing industrial site to the south of the village.

We are given no reassurances that the new housing will actually alleviate Oxford's housing waiting list, or if relocation of existing tenants could release housing for those in most need in the city. When we asked for detail the response was that it is too early... yet we are being asked to approve the "plan". There is insufficient commitment in the Local Plan to genuinely meet local need, nor to the need for smaller, affordable housing, a mixture of rented, shared ownership, retirement bungalows etc.

It is clear from all recent developments in our area that developers make more money from large detached houses. Such houses are mostly bought by affluent people from outside Oxfordshire, doing nothing to meet local housing need and simply pushing up house prices. How can it be guaranteed that the Garden Village will meet unmet local need and the properties will not be bought by London commuters?

The existing A40 does not constitute adequate separation according to the principles of the Green Village. A proper buffer could be created by moving the A40 to the north, the other side of the millennium wood and creating green space between the existing village and a reduced size Green Village.

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<tr>
<td>MM381</td>
<td>Eynsham Society</td>
<td>Jolyon Cox (Hon, Sec., Eynsham Society)</td>
<td>Dr</td>
<td>Cox</td>
<td>800</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 145</td>
<td>9.5.3a The statement that &quot;(Long Hanborough) is only suitable for very modest levels of further development&quot; is unsupported by any evidence. Unlike Eynsham, Long Hanborough has good rail access to Oxford (as noted in 9.5.7a), and is also served by the A4095 and A44, giving access to northern and eastern destinations. The current population of 2,400 is not excessive for a village even allowing for the 219 homes already approved, in stark contrast to Eynsham (pop. ~5000 , with 77 additional dwellings already granted, 10 under construction and outline permission for another 160) There is no reason why Long Hanborough should not accept modest additional development to alleviate some of the pressure on Eynsham.</td>
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<td>MM376</td>
<td>Stagecoach in</td>
<td>Nick Small,</td>
<td>Dr</td>
<td>Small</td>
<td>1003</td>
<td>&gt; SECTION 9 MAIN 146 para 9.5.7a Accessibility of Long Hanborough by public transport.</td>
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<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1151</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 146 9.5.5 - Green TEA supports the importance of cohesive local communities where people live close to their place of work, with local access to schools, medical facilities and leisure activities. Decanting people from the Oxford housing lists, making them suffer the cost of travel, separation from family and friends, access to jobs, etc., will make community creation more difficult.</td>
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<td>MM455</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
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<td>Commercial Estates Group</td>
<td>1158</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 146 Main 146: Paragraph 9.5.7a We object to paragraph 9.5.7a which, consistent with the Council's unsound approach generally, seeks to underplay the sustainability / suitability of Long Hanborough as a location for development, and misrepresents the relationship of the village to Hanborough Station. We take no issue with the updating of this paragraph to reflect the recently approved residential developments at the village - which is a matter of fact. However, we are unclear why the Council proposes to delete the previous reference (in paragraph 9.5.6) to the factual position that house prices in Long Hanborough are amongst the highest in the District, reflecting the good level of accessibility with Hanborough Station. We are not aware of any evidence to suggest that house prices in Long Hanborough are no longer amongst the highest in the District, and the Council itself acknowledges that rail services at Hanborough Station are due to improve further – presumably making it even more attractive and adding further to house price pressure in the village. The Council's amendment in this regard may initially be seen as only a minor and irrelevant one. However, it is part of a package of changes proposed by the Council which, together, seek to deliberately downplay the importance of Long Hanborough and its suitability for development. Any such downplaying / downgrading is wholly inconsistent with the available evidence. We further note that the Council retains its unjustified position that Hanborough Station (which for some reason the Council does not name in this paragraph) is located to the east of the village, rather than being at the eastern end of the village. The Council is aware from evidence submitted to the recent Public Inquiry relevant to proposals for 120 new homes on land adjacent to Hanborough Station, that it is clear that the station and the business park form part of the village.</td>
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<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
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<td>Crest Strategic Projects</td>
<td>1509</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 146 9.6 As set out elsewhere in these representations the growth of Woodstock has been limited in the period since WHS status was granted to Blenheim Palace and Park in 1987. The emergence of residential estates in the 1930s, 1950s and 1960s is therefore irrelevant in evaluating the case for additional development via this Local Plan, for the simple reason these developments were in place when the decision to afford WHS status was made. Since that time c.150 dwellings have been built in a town of around 1,500 dwellings (about 10% expansion).</td>
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<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs Kent</td>
<td>1182</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 147</td>
<td>9.7 The fact that there is developer interest in developing sites within and adjoining the town is hardly surprising and is largely irrelevant to any decision whether or not to allocate land for development. Similarly, a pending planning application should have no bearing on the plan-making process, within a planning system that is plan-led. This paragraph should be deleted in its current form. We welcome sustainable industry in Eynsham provided that social and affordable housing is built nearby. A science park would be welcome if it provided jobs for local people. We suggest development of the southern industrial area with new western bypass link (as per ENP) before considering a new science park on greenfield land. Is there proven demand for this? Green TEA advocate local housing priority for people with local jobs.</td>
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<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
<td>-</td>
<td>1513</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 147</td>
<td>9.8 The paragraphs should be qualified to make clear that Eynsham has an important role to play in helping to meet the unmet housing needs of Oxford; the SA did not consider that development at Eynsham would meet the wider needs of the District.</td>
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<tr>
<td>MM163</td>
<td>Eleanor Chance</td>
<td>- Chance</td>
<td>353</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 147</td>
<td>9.5.12 The proposed upgrading of the A40 is totally inadequate for the present traffic flow: when that is doubled the whole road will be at a standstill.</td>
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<tr>
<td>MM163</td>
<td>Eleanor Chance</td>
<td>- Chance</td>
<td>357</td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 147</td>
<td>9.5.18 A regular bus service is needed from Carterton/Witney/Eynsham to Marston, Headington, and Cowley (surely the areas of Oxford where most people are employed and where the hospitals are situated). Such a bus route would immediately reduce car traffic on the A40. 9.5.19 In Eynsham itself a 20 mile an hour speed limit is needed with traffic calming measures - speed humps/chicanes with small trees. 9.5.20 In Eynsham itself residents’ parking/2 hours is urgently needed in the conservation area. At present the whole central area is being used as an unofficial Park and Ride by people from surrounding villages catching the S1 into Oxford. Retail and Leisure: Eynsham has a thriving shopping community and it is essential that the big supermarkets are kept out of the area. Environment and Heritage: 9.5.25 and 8.27a Eynsham needs more large trees. Nearly all the large trees in the village are nearing the end of their lives, we need to plant for the future.</td>
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<td>MM163</td>
<td></td>
<td>Eleanor Chance</td>
<td>-</td>
<td>Chance</td>
<td>410</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 147</td>
<td>Employment: 9.5.11 A new 'science park' is not needed – we have a derelict 'business park' south of the village. This brownfield site should be used before any green fields are concreted over. Any new industrial buildings should have solar panels on their roofs.</td>
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<tr>
<td>MM357</td>
<td></td>
<td>Tony Bovey</td>
<td>Mr</td>
<td>Bovey</td>
<td>816</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 147</td>
<td>9.5.11, 30% commuting to Oxford: despite the proposed 40ha. employment site in the Garden Village, the quantum of housing proposed at Eynsham will increase the volume and proportion of commuting into Oxford. As the 1980s Headicar study of commuting from residential estates showed, the relationship between propinquity of homes and jobs is less strong than common sense assumes.</td>
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<tr>
<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1183</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MIN 96</td>
<td>The part-upgrading of the A40 might cope with existing congestion. The addition of a further 12,750 houses to the West Oxon. A40 catchment area, many of which will house Oxford workers, will reinstate and exacerbate the problem! The existing policy needs to be abandoned. The present A40 cycle route is not 'good' - it is poorly maintained and hazardous. We need a two way cycle path located on the southern verge of the A40 to avoid two crossings of the A40 by Eynsham cyclists, and to orientate homecoming evening cyclists away from westbound headlights. Urgent adoption of the B4044 Eynsham to Botley cycle/path plan to compensate for the loss of one A40 cycle lane and to provide a unique route to Oxford West and the station, taking the cyclists off this dangerous road! and thus easing the passage of cars to Oxford West, Oxford South and the A34. Priority bus lane, and cyclepath, along Eynsham eastern bypass to the tollbridge; a major commuting corridor. Provision of a joined up cycling/walking network within Eynsham village, with paths at least 2m wide - unlike the narrow, token path alongside the eastern bypass (3.12.CO11).</td>
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<tr>
<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1186</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt;</td>
<td>Expansion of the S7 bus service which covers the hospitals, and Brooke’s University. A cycle and bus route from Eynsham to Hanborough station. All with associated new bus stops. Residents-only parking in Acre End, Mill, High, Thames streets. Also Market Square (except disabled), with expanded car parking space elsewhere. All new public transport to be sustainable to reduce carbon emissions and pollutants. Effective traffic calming eg chicanes (with small trees), NOT speed humps, on through-roads and some residential roads.</td>
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<td>MM455</td>
<td>Commercial Estates Group</td>
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<td>Commercial Estates Group</td>
<td>1223</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MIN 96</td>
<td>MIN 96 Paragraph 9.5.16 We fully support the Council's acknowledgement that Hanborough Station is one of the District's largest and most well-used stations. We further support the reference to GWR's aspirations for further station improvements including additional parking, a footbridge and a new platform. This amplifies previously referenced and already committed improvements to train frequency and capacity.</td>
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<tr>
<td>MM59</td>
<td>RWB</td>
<td>Dr Barltrop</td>
<td>131</td>
<td></td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MIN 96</td>
<td>9.15.13: An issue which is worth including here or in related paragraphs is the need to improve road safety for cyclists and pedestrians along the B4044, and the proposal to build a 'community path' along the B4044 from Swinford through Farmoor to the edge of Botley - and the benefits that this would bring too for drivers along this route.</td>
</tr>
<tr>
<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs Marshall</td>
<td>1755</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MIN 96</td>
<td>“Eynsham has access to very good bus services, with regular premium services to Oxford, Witney and Carterton. There is a need to improve bus journey times however through Eynsham and approaching the Wolvercote roundabout on the edge of Oxford. Funding of £35m has been made available through the local growth fund and will be used to implement improvements including the provision of a new park and ride site to the north of Eynsham, coupled with the provision of an eastbound bus lane between the park and ride and the Duke's Cut canal bridge near Wolvercote. Woodstock is served by the S3 premium bus service to Oxford, Charlbury and Chipping Norton.”</td>
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<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
<td>-</td>
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<td>1883</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>MAIN 47 Para 6.13 states to plan for sustainable economic growth: “Address transport congestion in towns and on major routes - notably the A40. We will work in partnership with Oxfordshire County Council as they look to deliver already funded plans to improve access along the A40</td>
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| MM786 | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs | 2257 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MIN 96 | corridor to Oxford through a proposed Park & Ride site at Eynsham and a bus lane along the A40 eastbound into Oxford. We will also work with Oxfordshire County Council to identify funding for their long term strategy for the A40 which will involve dualling between Witney and Eynsham and a westbound bus lane.

Amendments to Paras 9.5.17 further state that: “Funding of £35m has been made available through the local growth fund and will be used to implement improvements including the provision of a new park and ride site to the north of Eynsham.”

We support these amendments to the plan which set out information on the agreed Park & Ride facility, we consider these amendments are justified and will assist with the delivery of sustainable development and are therefore sound. |
| MM786 | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs | 2258 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MIN 96 | Public transport availability in this area is good with railway stations at Tackley, Combe and Long Hanborough, the latter being one of the District’s largest and most well-used stations. Parking Car parking facilities have recently been expanded at Longhanborough to improve capacity and there are aspirations for further station improvements including additional parking, a footbridge and new platform so that any trains extended from Oxford can terminate and turnaround. To fully realise the potential of the Cotswold line, further redoubling will be required at the eastern and western ends of the line, between Wolvercote Junction and Hanborough, and from west of Evesham towards Pershore. This would allow up to three trains per hour to Hanborough and/or Charlbury and two trains per hour between London and Worcester, with a journey time under two hours. |
| MM381 | Eynsham Society | Jolyon Cox (Hon. Sec., Eynsham Society) | Dr | Cox | 802 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MIN 96 | Public transport in the south of the sub area is more limited however, due to the relative isolation of settlements from the rail network and the lack of bus service provision between villages and key destinations. |

9.5.17 “Eynsham has access to very good bus services, with regular premium services to Oxford, Witney and Carterton. There is a need to improve bus journey times however through Eynsham and approaching the Wolvercote roundabout on the edge of Oxford. Funding of £35m has been made available through the local growth fund and will be used to implement improvements including the provision of a new park and ride site to the north of Eynsham, coupled with the provision of an eastbound bus lane between the park and ride and the Duke’s Cut canal bridge near Wolvercote. Woodstock is served by the S3 premium bus service to Oxford, Charlbury and Chipping Norton.”

The A40 improvements are still under consultation until January 2017, and it is premature to assume in the draft Plan that they will take place. While the eastbound bus lane could reduce transit times to Oxford city centre, it is unlikely to assist those commuting to the major employment sites in Headington (JR, Nuffield and
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr Small</td>
<td>1005</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 148</td>
<td>Churchill hospitals, Oxford Brookes University, Oxford University Old Road Medical Campus) and Cowley (BMW), who make up the vast majority of the Oxford-bound commuter traffic. Adding another 2,750 dwellings at Eynsham, specifically to house those whom Oxford cannot accommodate, would add 5,000+ commuters (few if any houses in this area will be affordable on a single salary). Even if these commuters were able to reach their destination readily by bus, it would require up to 100 additional buses during rush-hour, or about one per minute, which is clearly not achievable – even the proponents of the A40 plan do not envisage more than one-tenth of this service level. The remaining new commuters would be forced to add to the unsustainable levels of existing road traffic, for which the A40 plans would provide no relief whatever. It is the height of irresponsible folly to suggest planting such a large number of new houses in a single location with wholly inadequate transport infrastructure and no solution even proposed.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr Small</td>
<td>1084</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 148</td>
<td>Stagecoach notes and supports the modification, that draws the conclusion that this Sub-area has a particularly important role to play in meeting the District’s housing and wider development needs, by virtue of its proximity to Oxford City. Stagecoach notes and agrees with the conclusions that the evidence base in the round points to the greatest opportunities being available around Eynsham; and equally that significant opportunities exist around Woodstock. There are already strong commercial public transport services offered in and nearby both settlements, which are likely to be considerably further strengthened in future, not least given the alignment with measures being brought forward through the adopted LTP4 “Connecting Oxfordshire” and the supporting Oxford Transport Strategy. The role of Hanborough as a service centre, and a key rail node, is one that certainly warrants further development opportunities being pursued, as the text states, which would take advantage of the opportunities offered by existing and future improved public transport. It is not clear to us that the evidence entirely supports the conclusion that such opportunities are quite as limited as the Plan states.</td>
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<td>MM455</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
<td>-</td>
<td>1159</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 148</td>
<td>Historic England welcomes and supports Proposed Main Modification MAIN148 for the recognition that the potential impact on the historic fabric of Woodstock in particular the Blenheim World Heritage Site is a key consideration, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework.</td>
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<td>whilst we do not object in principle to the identification of opportunities for development at Eynsham, we object to the deletion of references to Long Hanborough as one of the locations with the greatest potential for further development in this sub-area, and we are unclear as to the process adopted by the Council in concluding that Eynsham provides the greatest potential for further development. Whilst some additional development has been approved in Long Hanborough in recent months, the Council was right to identify this as a location with one of the greatest potentials for development, and this remains the case. The scheduled improvements and aspirations for Hanborough Station only add to this potential, together with the recently approved improvements to both doctors and education provision in the village.</td>
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The Council's evidence base confirms that Long Hanborough is a Rural Service Centre, like Eynsham. However, Long Hanborough of course benefits from Hanborough Station which is located at the eastern end of the village, and which is recognised by the Council to be one of the District's largest and well used stations. Paragraph 9.5.32 identifies that there are planned improvements to train frequency and capacity, and aspirations for much more substantial improvements. It is difficult, therefore, to see how the Council has so clearly come to the view of the potential at Eynsham, whilst Long Hanborough is ignored and actively, and unjustifiably, downgraded to 'Village' status. Our objections to Policy EW2 expand upon this issue.

Paragraph 9.5.33
For the reasons set out in our objection to paragraph 9.5.32, and set out in detail in our representations to Policies OS2 and EW2, we object to the statement at paragraph 9.5.33 that there is only scope for 'very modest levels' of development at Long Hanborough.

The Council identifies here that Long Hanborough offers fewer services than Eynsham or Woodstock 'other than the railway station'. Whilst this may seem minor of itself, it is part of a suite of proposed changes to the Local Plan which together seek to downplay the sustainability of Long Hanborough and its suitability for development, in a way that is inconsistent with the available facts and evidence.

This throw-away reference to the benefits of the station is unjustified and inappropriate. This is of course one of the only mainline stations in the District – a station that the Council itself identifies as being one of the District’s largest and most well-used stations, and a station where improvements to the frequency and capacity of trains are proposed in 2018 and where there are aspirations for even more significantly enhanced provision. To treat the availability and location of this station as if it is irrelevant to the sustainability credentials of Long Hanborough, is inappropriate and impossible to justify or reconcile with the facts or evidence.

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<tr>
<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1192</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 148</td>
<td>All transport and other enabling infrastructure for new projects to be completed as far as possible before house building starts.</td>
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<td>MM455</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
<td>-</td>
<td>Commercial Estates Group</td>
<td>1224</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 148</td>
<td>MAIN 148 Paragraphs 9.5.32 and 9.5.33</td>
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However, Long Hanborough of course benefits from Hanborough Station which is located at the eastern end of the village, and which is recognised by the Council to be one of the District’s largest and wellused stations. Paragraph 9.5.32 identifies that there are planned improvements to train frequency and capacity, and aspirations for much more substantial improvements. It is difficult, therefore, to see how the Council has so clearly come to the view of the potential at Eynsham, whilst Long Hanborough is ignored and actively, and unjustifiably, downgraded to ‘Village’ status. Our objections to Policy EW2 expand upon this issue.

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| MM491 Crest Strategic Projects | Crest Strategic Projects | Crest Strategic Projects | - | - | 1516 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 148 | Main 148: Paragraphs 9.5.30–9.5.33

9.9 The ‘key’ role that the Rural Service Centre sub areas have to play, in accordance with their status, should be qualified and defined clearly, so there is no ambiguity. The level of development assigned to each area should be consistent with the spatial strategy that has been selected via the SA process; the role of the Eynsham-Woodstock sub-area is distinct only insofar as it has a requirement to help meet the unmet needs of Oxford, which will sit alongside its secondary role in helping to meet development needs in accordance with its Rural Service Centre function (in accordance with the spatial strategy).

9.10 The potential for a significant scale of development within the sub-area in the vicinity of Eynsham rests on the evidence prepared for the Oxford Growth Board (OGB) by LUC70, which looked specifically at options for meeting the unmet housing needs of Oxford. While an extension to the west of the village was examined, this was only considered as an option to help meet Oxford’s housing needs (not West Oxfordshire’s) and comprised 550 dwellings within the Plan period, not 1,000. There is no presumption in the Council’s own SA of the preferred spatial strategy that supports a distribution including 1,000 dwellings to the west of Eynsham (strategic scale development).

9.11 The chosen spatial strategy comprises of two spatial options: Option 2, which directs a significant proportion/most development to the Main Service Centres, with a particular focus on the three main towns; and Option 5, which proposes a new village to respond to the unmet needs of Oxford. There is no clear, systematic evidential route that can be followed that leads the objective observer of the plan formulation process to a strategic urban extension to Eynsham to help meet the housing needs of West Oxfordshire. As such the allocation is considered to be unsound and should be deleted.

9.12 The modifications introduced at 9.5.32a are unsubstantiated (as set out within this suite of representations) and should be deleted.

| MM751 Goldfield Estates | Goldfield Estates | - | - | 1860 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 148 | As per proposed modifications Main Modification 148 and Main Modification 150, the Consortium generally supports the total indicative housing requirement of 5,500 homes for the Eynsham-Woodstock sub-area as a minimum threshold for housing delivery over the plan period. It is however, noted that such a figure should not be considered an absolute or ‘up to’ level of housing delivery. The Consortium therefore consider that the wording of relevant policies should reflect specified housing requirements as a minimum target.

As such, the Consortium supports as a minimum that the proposed West Oxfordshire Garden Village will deliver around 2,200 new homes by 2031 to contribute entirely towards meeting the housing needs of Oxford. |

<p>| MM780 North A40 Land Consortium | North A40 Land Consortium | - | - | 2133 | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 148 | As per proposed modifications Main Modification 148 and Main Modification 150, the Consortium generally supports the total indicative housing requirement of 5,500 homes for the Eynsham-Woodstock sub-area as a minimum threshold for housing delivery over the plan period. It is however, noted that such a figure should not be considered an absolute or ‘up to’ level of housing delivery. The Consortium therefore consider that the wording of relevant policies should reflect specified housing requirements as a minimum target. |</p>
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<tr>
<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr</td>
<td>Murray and Blackwell</td>
<td>2309</td>
<td>MAIN 148 - Paragraph 9.5.30</td>
<td>City. It is noted at paragraph 9.5.40b that delivery is expected between 2021 and 2031, unless delivery can be accelerated. It is emphasised by the Consortium that development should come forward at an appropriate time, as informed by relevant technical evidence. Notwithstanding, the Consortium agrees that the delivery of new homes at the proposed Garden Village should be treated separately for the purposes of 5 year housing land supply.</td>
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<td>MM219</td>
<td>Helen Brooke</td>
<td>-</td>
<td>Brooke</td>
<td>-</td>
<td>423</td>
<td>MAIN 148</td>
<td>I wish to comment particularly on Paragraph 9.5.32 This raises two potential areas for development: 1,000 homes to the west of the village and 2,200 in a 'new garden village' to the north of the village. Taken together, these would more than double the size of Eynsham and would totally change its character. Many residents are not opposed to reasonable expansion of the village but it seems completely unreasonable to expect Eynsham to absorb 1,000 homes within the village as well as the proposed 'garden village', which would be in a location not far enough away from the existing settlement to be a separate entity.</td>
</tr>
<tr>
<td>MM293</td>
<td>Nick Bullard</td>
<td>Mr</td>
<td>Bullard</td>
<td>-</td>
<td>508</td>
<td>MAIN 148</td>
<td>I understand that in the light of the difficulty of navigating the feedback document, it is acceptable to send comments in an email. I have a few comments on the following paragraphs. Paragraph 9.5.32 This raises two potential areas for development. 1,000 homes to the west of the village and 2,200 in a 'new garden village' to the north of the village. Taken together, these would more than double the size of Eynsham and would destroy its character. Reasonable expansion of the village would be perfectly acceptable, and would meet the approval of many residents, but this goes well beyond the bounds of that. It is quite clear that the 'new village' is far too close to the existing settlement of Eynsham to meet the requirements of a garden village (where separation is a criterion), and I'm surprised at the poor judgement of WODC in putting forward such an inappropriate development. In my view, even the 1,000 homes west of the village is excessive - a figure of several hundred would be more appropriate. But the 'garden village' is hugely disproportionate.</td>
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<tr>
<td>MM309</td>
<td>Phillip Parker</td>
<td>-</td>
<td>Phillip Parker</td>
<td>-</td>
<td>549</td>
<td>MAIN 148, para 9.5.33</td>
<td>I do not believe that opportunities for sustainable development (in line with core Objectives particularly CO1 - CO3) within Wootton have been objectively assessed, and opportunities for development in Wootton should be included here. Wootton is a small village but with important community facilities including school, shop and pub. The village facilities could sustain and would benefit from an increase in village population.</td>
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| MM328         |                         | Russ Canning    | Mr Canning       | 613        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 148 | Not Sound. The current schematic site layout for the proposed “Garden Village” identifies a clearly defensible northern boundary based upon a tree and hedgerow-lined watercourse, which forms a “fold” in the gently undulating pastoral landscape. Any “future expansion” beyond this natural boundary would be contrary to the Local Plan policies identified above. All reference to expansion should be explicitly removed from the Plan. Any future expansion would:  
• Severely impact upon the high quality Cotswold landscape that characterizes the setting for both Freeland and Church Hanborough villages to the north.  
• Would intrude into the beautiful Evenlode valley.  
• Would sterilize mineral reserves.  
• Would intrude onto areas of restored landfill.  
• Would intrude further into farmland that has significant biodiversity value.  
• Would exacerbate the coalescence of Eynsham, Freeland and Church Hanborough.  
• Create a continuous, amorphous, suburban sprawl between Eynsham and Long Hanborough. |
| MM357         |                         | Tony Bovey       | Mr Bovey         | 817        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 148 | 9.5.32: subject to strategic caveats above, Eynsham area has scope for more employment and development of a high skill, dynamic and high wage scientific complex of interlinked activities. Shape of the potential Garden Village should be modified to increase north - south extent (for better access to Hanborough Station and reduce adverse traffic impact on Eynsham) and reduce its east west extent (provided there is convenient access to the Park and Ride). |
| MM376         | Stagecoach in Oxfordshire/Stagecoach West | Nick Small, Stagecoach Bus | Dr Small | 1007 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 149 | MAIN 149 para 9.5.34 Role in meeting Oxford’s unmet housing needs. Stagecoach notes and supports the conclusion of the Council that the sub-area is well located to play an important role in meeting Oxford’s unmet housing needs, subject to major infrastructural improvements being brought forward. It is especially important that the Plan supports the delivery of key measures in Oxfordshire’s Local Transport plan “Connecting Oxfordshire”, and the subordinate Oxford Transport Strategy, to ensure that in so doing, the opportunities for sustainable transport are fully taken up. Without this, the transport impacts of this growth on links towards the City, within the District and in adjoining Authorities, would in all probability be unacceptable, based on the modelling already undertaken by the County Council. Resolving this question will require further micro-simulation work, to better understand the issues, and refine and develop measures proposed, and others that may well be required. There is a great deal of potential for growth in the sub-area to take advantage of good public transport links in the short term Longer-term, the provision of new Outer Park and Ride sites at both Eynsham and on the A44 corridor (site to be determined) would need to take advantage of further enhancements in bus frequency. |
on the corridors passing both sites.

We also agree that there is potential to develop the rail station at Hanborough into a stronger public transport hub. However we believe that this potential is most likely to relate to existing and improved bus routes running along the A4095 to Witney, for which it is the nearest rail-head, rather than from the south, at Eynsham, from where very frequent bus service links to a much broader and more frequent rail services available at Oxford Station, are already provided. These will no doubt be enhanced with services serving the proposed Park and Rode site, which would be very accessible from the proposed new Garden Village at Tilgarsley; and these conceivably might also include links to Oxford Parkway station in the longer term, as part of improved public transport connectivity to the Oxford Eastern Arc.

Historic England welcomes and supports Proposed Main Modification MAIN149 for the addition of the requirement that "The historic environment needs to be conserved and enhanced", as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.

The 'Main Modifications' form states that "There is severe traffic congestion on the A40 between Eynsham and Oxford peak times". This was before the proposed expansion of Eynsham and other villages, including the garden village(12,750), which would double or treble the size of the Eynsham feeder-area to the A40. Why not sort out the existing commuter problem before adding to it? ‘Meeting Oxford’s unmet need’ will not be helped by creating yet another problem, and is unsound planning.

We support the Council’s acknowledgement that the District can play an important role in helping meet Oxford City’s unmet housing needs alongside major infrastructure enhancements. We also support the specific recognition that there is potential to develop Hanborough Station as a stronger transport interchange with additional parking (with the need for improved access from the south presumably associated specifically with the Garden Village proposals due to their distance from the station).

9.13 The references to the role in meeting unmet housing needs arising from Oxford City is supported, as is the acknowledged need to ensure that the important heritage assets within the area are conserved and enhanced. There is potential only for limited development at Woodstock and not at a scale that would require allocation. Policies OS2 and H2 would both allow for development at Woodstock, in its capacity as a Rural Service Centre, in accordance with the criteria set out within the policies. Application of the criteria would ensure that proposals coming forward via the development management/planning application route would be assessed having regard to the identified material factors and determined accordingly. An appropriate scale of development would therefore continue to be delivered at Woodstock following adoption of the Plan.

9.14 In accordance with the spatial strategy the final bullet point should be amended to refer to the potential for some development at the Rural Service Centres in accordance with the provisions of the settlement hierarchy.
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<td>1886</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 149</td>
<td>MAIN 149 Para 9.5.34 notes that development at Eynsham can play an important role in helping meet Oxford City's unmet housing needs alongside major infrastructure enhancements. We agree and for the reasons set out above we support this change which we consider is justified and sound.</td>
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<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
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<td>Cantay Estates</td>
<td>1917</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 149</td>
<td>Proposed modification- Downgrading of Long Hanborough: The proposed modifications involve the downgrading of Long Hanborough from a service centre, to a lower order village. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN13, MAIN14, MAIN15, MAIN59, MAIN66, MAIN145, MAIN149. Detailed comments particular to each modification are set out in detail against the relevant reference in following sections. We object to proposed modifications which suggests the downgrading of Long Hanborough from a rural service centre to a village. The submission plan confirmed the rural service centres were classified as such because they benefited from a range of services and facilities which supported the village and surrounding area. They are able to support additional homes in the short-term, while proposed growth can enhance the role of the settlement in supporting the surrounding rural area (paragraph 4.18). This approach was directly in line with the plan's objective 1 'strong market towns and villages' and objective 4 'sustainable communities with access to services and facilities', both of which remain un-modified. Long Hanborough retains the same services and facilities which existed at the time the plan was submitted, furthermore planning permission has been granted which allows significant expansion of the primary school (15/03341/FUL). While additional housing has been permitted no evidence has been produced to suggest additional homes would result in any harm to the character or sustainability of the settlement. The village therefore remains well placed to fulfil the role of a rural service centre. The downgrading of Long Hanborough proposed through modifications is largely unexplained and not supported by any evidence. The Council cite the creation of a 'new' service centre through the northern expansion of Eynsham as justifying the downgrading of Long Hanborough as the new development will need to &quot;develop a critical mass of services and facilities&quot; (paragraph 2.5a). We are concerned the Council's explanation suggests an intention to restrict the development of Long Hanborough and reduce services in the village in order to encourage their replacement in the new development. A restrictive approach to development stifling an existing sustainable settlement and vibrant community is clearly at odds with the Plan's vision, policies of the NPPF and good planning practice. The provision of an additional service centre would be entirely in line with the Plan objectives. If the development proposed north of Eynsham is to proceed it is clearly preferable that Long Hanborough maintains its status as a service centre complementing any new facilities created. The need to retain the service centre is particularly pronounced due to the unclear deliverability of the proposed site north of Eynsham, even if the site is delivered this will not be until the latter part of the plan period, therefore there is a need for services and facilities in the interim. The submitted plan set out clear objectives which the following policies sought to deliver sustainable</td>
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| MM756        | Cantay Estates          | Cantay Estates  | -                | 1938       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 149 | Proposed modification - Expansion of Eynsham: The proposed modifications introduce a significant strategic development to the north of Eynsham to meet Oxford City's unmet housing need. This change pertains to numerous modifications, we therefore set out our response below which we wish to be considered in response to the following modifications: MAIN3, MAIN7, MAIN9, MAIN13, MAIN14, MAIN15, MAIN23, MAIN24, MAIN27, MAIN58, MAIN60, MAIN149. Detailed comments particular to each modification are set out in detail against the relevant reference in following sections.

The same modification seeks to introduce the new strategic development north of Eynsham. The proposed development is of a strategic scale in a location which previously only saw limited development. The strategic area has been newly introduced at the examination stage, rather than through the extensive consultation process which should inform fundamental decisions in plan making.

The proposed 'Garden Village' is a strategic site suggested to be a new standalone settlement. Such a development is a clear departure from the submitted spatial strategy which emerged from the earlier consultation stages and was informed by the evidence base. The proposed new development is a clear departure from the proposed development plan, not a mere modification.

The proposed changes to the plan are so significant that they amount to a fundamentally different strategy to that submitted for examination. Should the Council wish to make such a fundamental change it should be done so through a new plan informed by a suitable evidence base and following a formal consultation process. To do otherwise would undermine the credibility of the plan and public confidence in the planning process.

A consequence of the limited considerations which have informed the introduction of the development area is considerable uncertainty as to the achievability of the proposed scheme. The site was previously discounted as unsuitable for development within the submitted SHLAA, no updated document has been published to revise this status. Noise impacts, segregation across the A40 and landscape impacts are all identified as being prohibitive to development. No information has been produced to demonstrate how these issues may be overcome, nor whether they are less pronounced at any other development site. Similarly the proposal was dismissed as not being realistic in the submitted SA, little is offered to justify such a fundamental change in stance.

Development strategy for the proposed site is deferred to a later Area Action Plan, we consider however development parameters must be set out and explored in order to ensure the proposed scheme is achievable. The Plan also refers to an expression of interest submitted to Government seeking to obtain Garden Village status for the development, unlocking funding streams to deliver infrastructure to unlock the site.

Although an expression has been submitted, no decision has yet been issued. In excess of 50 similar expressions have been made nationally, therefore Garden Village status is far from guaranteed. Proper exploration must be made as to the sustainability, suitability and deliverability of this site and essential infrastructure in the event it does not secure Garden Village status.

MAIN9: The propose modification identifies the proposed expansion north of Eynsham to be an 'exemplar' development with regard to design and environmental performance. The aspirations for the development are laudable, however only very high level initial assessments have been undertaken to establish whether this is deliverable, particularly in the context of the landscape previously considered vulnerable to development.
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<td>MAIN23: The proposed alteration to the wording from the ‘majority’ of development being delivered in the district’s towns, to a significant proportion, confirms the proposed expansion to the north of Eynsham to be a deviation from the strategy set out under policy OS2 in the Submission Plan. We consider the fundamental change of the strategy renders this a new plan, it should therefore be developed as such, rather than processed through modifications.</td>
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<td>MAIN25: We welcome the proposed increase in housing provision within the plan to reflect the objectively assessed need set out in the Oxfordshire SHMA (660 dwellings per annum). Although the headline figure for housing provision is increased the means of meeting that need is somewhat unclear in the document. The proposed site allocations fall someway short of the accepted housing requirement. Allocated sites and suggested windfalls total 11,545 homes, some 1,655 homes below the housing target for West Oxfordshire (13,200). Although not clearly stated it seems the Plan is reliant on a significant number of sites which have on the deliverability of these sites.</td>
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<td>The published housing supply position paper sets out the Council’s assumptions on the deliverability of permitted homes. This is set against a backdrop of previous under-delivery in relation to the objectively assessed need, including in the initial five years of the plan period. The anticipated delivery of homes from larger sites (more than ten units) is particularly optimistic given the recent under-delivery of homes and the longstanding nature of several of the outline planning permissions. The anticipated delivery figures (Appendix 1) do not appear to assume all planning permissions granted for larger sites will be implemented. The assessment of smaller sites makes a concession (9.1%) in acknowledgement that not all permissions will be implemented; an allowance for non-delivery of larger sites is also required. While uncertainty exists as to the deliverability of a significant proportion of the required housing supply questions remain as to the soundness of the plan. Robust evidence should be produced to show the permitted sites can be relied upon to deliver homes, additional allocations should also be made to mitigate against any shortfall.</td>
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<td>MAIN27: The allocation of non-strategic sites is welcomed and we believe imperative if the housing need of the district is to be satisfied. We are concerned that those sites allocated have not been selected through thorough testing, including consideration of all reasonable alternatives as set out by the regulations. As a consequence the soundness of the allocations and broader plan is in doubt. We have raised our concerns with regard to the unpublished SHELAA earlier in these representations; those comments also apply to this modification. The fact that the plan preceded the assessment significantly undermines the credibility of the plan as an evidence based document as do shortcomings in the assessment. We consider Long Hanborough to be a suitable location for development as it benefits from an excellent range of services and facilities, including a railway station. We believe additional development sites should be permitted in the village alongside those proposed in the modifications. The proposed development site at Tuckwells Pit, Church Road (SHELAA ref 225) is a suitable location for new development. It can sensitively accommodate new homes in a location which benefits from access to key services and facilities. A Landscape and Visual Impact Assessment has confirmed development of the site can have a beneficial effect on the landscape while the off-road cycleway on Main Road provides viable access to the railway station.</td>
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MAIN29: The proposed modifications seek to rely upon windfall development to fulfill the housing requirement at a rate of 125 homes per year. Although this policy is informed by previous delivery rates the published SHELAA suggests insufficient developable sites exist to fulfill that rate of development throughout the plan period. As the Council’s own SHELAA suggests insufficient sites are available to fulfill the suggested windfall rate either the evidence, or the proposed strategy must be unsound.

Historic windfall delivery rates have been achieved in the district’s larger settlements including those designated as service centres. The proposed downgrading of Long Hanborough reduces the likelihood of homes being delivered in the village further reducing the chances of windfall housing rates being maintained. Although an alternative service centre is proposed to be provided this is for delivery within the plan period and therefore will not give rise to any windfalls.

MAIN59: The proposed emphasis on the desirability of locating development in locations with access to public transport is at odds with the modification suggesting downgrading Long Hanborough’s settlement status. The village is one of only two in the district which benefit from a significant railway station.

MAIN60: The plan identifies significant challenges upon the A40, particularly with regard to access to Oxford. Although several alleviation options are suggested none is carried forward in plan proposals which acknowledges necessary funding is not available.

The proposed strategic development area at Eynsham is suggested on the basis that alleviation of A40 issues could be provided, however their achievability is unknown. The uncertainty of delivery of necessary highway improvements calls into question the suitability of the proposed strategic development area. The Plan which relies upon this area to meet its portion of Oxford’s unmet housing need cannot be sound until the site is known to be deliverable.

MAIN66: The proposed modification underlines a success in the current plan period in encouraging use of railway connections in the district, particularly from Long Hanborough. The modification acknowledges the capability of the rail corridor to remove vehicles from the A40 as residents travel toward Oxford and London, and the desirability of increasing capacity of Hanborough station and the railway link.

The modification supports improvements to the rail connection and acknowledges the need to provide the proposed development north of Eynsham with connections to Hanborough station. It is perverse therefore that the plan seeks to restrict development in Long Hanborough as developments in the village could provide easy access to the railway station and contribute to providing enhanced services and facilities. We consider the village should retain its rural service centre status and consideration given to additional non-strategic allocations to make the most of this opportunity for sustainable development.

MAIN145: The proposed modification suggests Long Hanborough is not in a position to support significant levels of additional development, however no evidence is provided as to any particular harm which would arise from residential development over and above that in the plan.

The document identifies the opportunity in the village in enhancing sustainable transport options through improvements to the station, this presents scope for new homes to be developed with a tangible benefit for the district. No unique sensitivities are identified, we therefore believe additional housing development should be allocated (beyond that proposed) and windfalls encouraged in Long Hanborough.

MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is
clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPF’s encouragement of environmentally sustainable development.

The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use altogether. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.

New homes created in Long Hanborough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan.

The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south. These would be more distant than any point within Long Hanborough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.

The area has good rail service availability with railway stations at Tackley, Combe and Long Hanborough.

No consideration seems to have been given to spreading some of Oxford’s unmet needs wider, offering at least some alternative to living in one ‘village’ location with one transport option. Lifestyle choice is at least as important as just being close to Oxford if this is not to be an Oxford overspill estate.

Bus services (eg. 11) have just been cut back, making it more difficult to get from Hanborough to Eynsham & Oxford. Expansion of Long Hanborough (west, south & possibly east) & Eynsham (west & north) will dramatically alter the character of these villages & the surrounding natural landscape which are supposed to be so special. Light pollution will escalate, roads will become choked with traffic, schools & doctors surgeries will not be able to cope. Green fields will be concreted over. All because of the grossly inflated housing targets inflicted on local communities by central government.

Woodstock is part of the Eynsham-Woodstock Sub Area. WTC note that the level of housing proposed for Woodstock in the new version of the Plan has risen from roughly 150 to 670. This is at odds with WODC’s recognition in the Plan that the town is of national and international significance. There are currently in the region of 1,500 dwellings in Woodstock. The level of housing proposed in the Plan will make Woodstock half the size again. This is totally unsustainable. WTC note that sites on the edge of Woodstock have been submitted to Cherwell District Council to be considered for allocations to help meet Oxford’s unmet housing need. If these were allocated as well, the town would double in size. Entirely unsustainable.
The level of housing proposed will destroy Woodstock’s distinctive character and ultimately affect the tourism upon which the town relies. It is difficult to see how anyone would wish to visit a historic town, which has become heavily congested and pedestrian unfriendly (pollution, noise etc...).

WTC would draw WODC’s attention to a questionnaire it recently prepared, asking residents what they felt about the level of housing proposed at Woodstock. There was clear concern by local residents over development proposed for the town. A copy of the questionnaire can be found at Annex 1 of this representation and a report on the results can be found at Annex 2. WTC would also point out that it carried out two other formal Parish Polls in recent years and the feedback was the same - Woodstock cannot sustain further development.

The analysis below shows how each of the sites proposed for allocation in Woodstock are unsuitable, even in isolation. When combined together it shows WODC’s approach to development in Woodstock as unsympathetic and not considered properly.

In addition, there is an alarming lack of evidence to support crucial assumptions made about the sites.

I am writing to you with great concern over the proposal for an extra 670 houses in Woodstock. My family and I have lived in Woodstock for 17 years, and in that time we have seen a great deal of change. Every few years there has been a proposed development which has caused a great deal of stress for local residents, resulting in a feeling that we can no longer simply live our lives in peace as we await the next proposal. Four years ago, Blenheim Estate bought the land adjoining Old Woodstock with the promise from the late Duke that he would never build on this land. And yet here we are again.

In Old Woodstock, we have a thriving, happy community. Our children play out in the streets and in the playground, and are constantly in and out of each other's houses. Neighbours look after the elderly folk on our estate. Residents enjoy the recreational facilities at the end of Rosamund Drive and walk in the fields alongside our estate. This kind of community is very, very precious and the importance of community should not be forgotten in the Local Plan.

I am objecting not only to the proposed development in Old Woodstock, but to all 670 houses planned for Woodstock. We have already had two significant developments built close to the secondary school, along with smaller developments at Young's Garage and along Banbury Road, and some 'in-filling'. The impact of these developments has already become apparent, and forms the basis of my objection as follows. Any extra development would have an unimaginable effect.

1. Schools.
   * The primary school expanded a few years ago when the children of Old Woodstock did not get places; this year our children are once again not getting into the primary school as recent developments close the school have effectively squeezed the children of Old Woodstock 'out of catchment'. Thus, the proposed Banbury Road and South East Woodstock developments would impact Old Woodstock.
   * The current level of traffic around both the primary and secondary schools is at a dangerous level; the recent collision between two buses outside the secondary school was an accident waiting to happen.
   * Traffic.
The level of traffic through Woodstock is already high, made considerably worse by the high number of events being staged by Blenheim Palace. Extra houses, with potentially 2 cars per household, will only make this situation worse.

* The pavements along the A44 through Old Woodstock are very narrow, and we struggle to walk along them with the heavy lorries sweeping past. A few years ago the city council removed the school bus which served Old Woodstock, forcing primary-aged children and mums with buggies to walk the mile to school along these unsafe roads.

* Buses which are scheduled to drive down High Street and Market Street are often unable to get down these roads due to careless parking, with the result that three - soon to be four - services regularly continue on to our estate in Old Woodstock to do three-paint-turns. If an extra 120 cars will be accessing a new estate through Vermont Drive, we will see the same chaos with buses and cars vying for the same road space.

* Parking.

* We have an excellent car park in Woodstock, but it is frequently full, especially when large events are taking place in Blenheim Palace. I prefer to park here and walk to collect my son from school, but frequently I am unable to find any space.

* I rarely use the shops in Woodstock as it is not easy to park, so I only use them if I have time to walk from Old Woodstock.

* More and more people are parking along the main road through Woodstock and Old Woodstock due to the parking charges levied by Blenheim. At one point, I counted three cars parked between the zebra crossing (and the Number 95 gate opposite the Black Prince) and the blind bend opposite the pub. Cars also regularly park outside the ‘Blenheim Orange’ house, which is hidden from anyone approaching that bend driving north. Again I have witnessed lorries having to swerve out into oncoming traffic to avoid these cars.

* GP Surgery. Our surgery is small and it serves both Woodstock and many of the surrounding villages. I recently tried to get a non-emergency appointment and was happy to wait a few days, but there were no spaces available, and I was re-directed to a surgery in Kidlington. The currently surgery cannot cope with the existing number of residents, let alone an extra - perhaps 670 x 4 = 2680 residents.

5. Recreation and well-being. I have listed this item last, as it rarely seems to be considered as a factor in planning, but I would ideally list this first. In Old Woodstock we are bounded by the A44 on one side and the Glyme River on the other. For us, the open space to the north is essential for recreation and for mental well-being. I live four houses along from the playground and field, and my kitchen looks out over the road. I see a steady stream of people walking past our house heading for the field, including people who are following the Pathfinder Guide, dog walkers and locals out for a stroll. Children are always in the playground and in the field. For us it is a small piece of heaven. Every year we watch the skylarks nest in the fields, and the long line of self-seeded hollyhocks grow along the footpath in the middle of the field. We see roe deer at dusk and red kites circling overhead. Building a replacement playground in the middle of a new housing estate could never, ever be a substitute.

I implore you to dismiss all 670 houses from your Local Plan. The Woodstock infrastructure simply cannot cope with any more development.
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<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1179</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Table 9.4 – Anticipated Housing Delivery in Eynsham – Woodstock Sub Area We object to Table 9.4 insofar as it results in double-counting between allocations and windfall assumptions and does not, therefore, deliver as much housing as is suggested. Table 9.4 identifies a windfall allowance for this sub-area of 32 homes in the period 2016 - 2031. However, the Council then proposes to allocate the site at Oliver’s Garage in Long Hanborough for 25 homes. We take no specific issue with the proposed allocation / development of this site. However, as a brownfield site within the urban area this is a site that, if it comes forward, would be a windfall moving forward and would, therefore, be part of the 324 homes allowance. By allocating it specifically, this is in effect double-counting. The Council should either reduce the current windfall allowance by 25 homes or delete the proposed allocation of Oliver’s Garage (the former is probably the easiest and most appropriate).</td>
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<td>MM57</td>
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<td>CB#73</td>
<td>Dr</td>
<td>Baker</td>
<td>125</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>What is the evidence for the ‘unmet housing need’ and that it would be best located at Eynsham, which has such poor infrastructure? Is it up to date? Will it be reviewed post---Brexit? There is no spare space in the plan if it isn’t possible to build the planned number of houses on a given site. In Table 9.4 requirement is 5500 and total of proposed sites is 5474.</td>
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<td>MM55</td>
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<td>Catherine</td>
<td>Mrs</td>
<td>Baker</td>
<td>128</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Section 4, Policy OS2 - Locating Development in the Right Places states that all development should be ‘of a proportionate and appropriate scale to its context’ and ‘form a logical complement to the existing scale and pattern of development’. It should also ‘avoid the coalescence and loss of identity of separate settlements’ and ‘not have a harmful impact on the amenity of existing occupants’. The proposed extra 1000 houses to the west of Eynsham, together with the proposed Garden Village development of 2200 houses just across the A40 from Eynsham, is out of proportion to the size of the existing village. This kind of rapid large-scale development does not complement any existing scale or pattern of development in the area; furthermore, the addition of the Garden Village will turn Eynsham into a small- to medium-sized town because two settlements so close together will inevitably coalesce, with a resulting loss of identity for Eynsham as it now exists. The proposed building over so much land to the north and west of Eynsham will certainly have a harmful impact on the amenity of existing occupants - even if sufficient new infrastructure is provided, access to cherished open space will be lost, as will the village atmosphere and the semi-rural environment that residents currently enjoy. For all these reasons, the planned large-scale developments at Eynsham do not meet the stated aims of the policy and are therefore unsound within the policy’s own terms. New housing is certainly needed, and no doubt Eynsham is a good location for some of it - but where is the evidence that all the new housing in this area should be put in a single location? Sharing out the Oxford overflow housing more widely would result in a better choice of locations for new residents - not everyone</td>
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<tr>
<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
<td>-</td>
<td>Crest Strategic Projects</td>
<td>1571</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>wants to live in a large village/small town which may well be somewhat amorphous and lacking in character as a result of the speed of development.</td>
</tr>
<tr>
<td>MM733</td>
<td>Angie Titchen</td>
<td>Dr Titchen</td>
<td></td>
<td></td>
<td>1693</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>9.15 The reference to development being focussed at the Rural Service Centres within the sub-area reflects the spatial strategy informed by SA. However the scale of development that the Local Plan proposes is not justified having regard to the evidence base (Eynsham, Woodstock). 9.16 The housing target should be revised to reflect the quantum of development proposed within the submission Local Plan, in addition to which the 2,750 dwelling working assumption, to help meet Oxford’s unmet housing need, should be added; to be delivered in the form of a Garden Village in the Eynsham area. Currently this is proposed at two sites; to the north of the A40 and to the west of the settlement. The Council should consider whether the full obligation could be more sustainably and comprehensively met on land north of the A40 in a single free-standing settlement. The LUC study identified capacity at the Garden Village at a net density below 30 dwellings per hectare. The Council should consider fully whether a higher average density (30-35 dph), which would still accord with Garden Village principles, may allow for a single comprehensive development to be delivered in a more focussed and viable way. 9.17 Table 9.4 should be amended to delete the West Eynsham SDA, adding the balance of the unmet need quota to the proposed Garden Village SDA; the three proposed allocations at Woodstock should be deleted and the indicative housing requirement amended to 4,350. The West Eynsham development area for up to 550 dwellings could be held in reserve as a contingency site to be released if the Garden Village delivery trajectory slows or there are delays in bringing the site forward within the Local Plan period.</td>
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<tr>
<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
<td>-</td>
<td>-</td>
<td>1857</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Para 9.5.37 / Table 9.4: The changes to the LP make no allowance for non-delivery of any particular site. There is no reserve provision within district, sub-area or even within the SDA/AAP areas at Eynsham. Table 9.4 is typical, requirement is 5500 but total of proposed sites is 5474 providing no spares at all.</td>
</tr>
<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td></td>
<td></td>
<td>192</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Paragraph 9.5.37: Mention is not made here of a priority to build affordable homes for local people first. Will that be the case?</td>
</tr>
<tr>
<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson</td>
<td>c/o Barton Willmore</td>
<td></td>
<td>2023</td>
<td>&gt; SECTION 9 - STRATEGY Eynsham - Woodstock Sub-Area The Eynsham - Woodstock sub area anticipated delivery in Table 9.4 only amounted to 5,474 for 2,724</td>
<td></td>
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</table>
As outlined previously, objection is raised to the proposal for the unmet need from Oxford City being addressed in the period from 2021 onwards, rather than from 2011 based upon under-delivery in the City since then. Whilst delaying delivery of the unmet need until 2021 may reflect the work undertaken by the Oxfordshire Growth Board, as set out above, it is not disputed that North Eynsham will not deliver prior to 2021. However, this underlines the need for the Council to augment its housing land supply to identify and allocate additional land for housing in the short term to meet housing needs in the first half of the plan period and to speed up delivery by proposing some medium sized, deliverable sites. This is especially important given the very significant shortfall of 1,836 homes, the serious affordability concerns in the district (house prices 10 times lowest incomes) and in light of the Inspector’s preliminary findings that it was his initial view that unmet need would need to be taken into account in calculating the 5-year land supply (Paragraph 7.6 (IN015)). A consequential change is therefore required to Paragraph 9.5.37 (MM150) to reflect that for the purposes of 5-year supply over the whole plan period.

Notwithstanding our concern regarding the Council’s approach to only addressing unmet needs from the City of Oxford post 2021, the expectation that North Eynsham will deliver 220 dwellings per annum over a 10-year period is both optimistic and unrealistic. It is highly likely that North Eynsham will continue to deliver homes beyond the plan period. Whilst that in itself is not of concern, this underscores that it is unlikely to yield the number of homes within the plan period as claimed by the Council. The recent NLP report on housing delivery in November 2016 confirms that the average planning approval period for sites of 2,000 or more dwellings is 5 years and the average annual build out rate for sites of 2,000 or more dwellings is 161dpa: This reflects the limits to number of sales outlets possible on a site, and overall market absorption rates. Given the proximity of west Eynsham to the North Eynsham proposal, this is likely to affect the rate of delivery overall in terms of local market competition. We consider that Eynsham is unlikely to yield development completions in 2021 given the need for the planning approval process, including an Area Action Plan prior to a planning application and recognition of a delivery rate of 160dpa and a start in 2022 (the site is unlikely to deliver completions in its first calendar year), the site will only deliver 1,440 homes in the plan period: 760 less than assumed by the Council. Yet there is no Plan B.
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<td>MM772</td>
<td>Spitfire Homes</td>
<td>Spitfire Homes</td>
<td>-</td>
<td>Spitfire Homes</td>
<td>2073</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>In line with comments made in respect of Main Modifications 27 and 30 (see above), Table 9.4 and Paragraph 9.5.41f should be updated to include a housing allocation comprising 'Land South of Abingdon Road, Standlake (50 homes)'. This will provide greater flexibility to the Local Plan and housing delivery, which the Council recognises is constrained in the shorter term. In turn this provides for a positively prepared Local Plan which could be considered 'sound'. The Council will be aware that Spitfire Homes has engaged in pre-application dialogue concerning their specific site interest South of Abingdon Road, Standlake. In line with recent dialogue, this engagement has demonstrated the form of development that Spitfire Homes consider could come forward with in the next 5 year period to 2021.</td>
</tr>
<tr>
<td>MM775</td>
<td>Mactaggart and Mickel Homes Ltd</td>
<td>Mactaggart and Mickel Homes Ltd</td>
<td>-</td>
<td>Mactaggart and Mickel Homes Ltd</td>
<td>2084</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>1.0 INTRODUCTION 1.1 Kemp &amp; Kemp LLP is instructed by Mactaggart and Mickel Homes Ltd (&quot;our client&quot;) to prepare this submission in response to West Oxfordshire District Council’s (&quot;the Council&quot;) consultation on its Local Plan 2031 - Submission Draft Including Proposed Modifications (&quot;the draft Plan&quot;). 1.2 Our client is promoting Land to the South West of Downs Road, Standlake as a housing allocation with associated services and facilities. The site can be seen, outlined in red, on the plan found at Appendix 1 of this submission. 1.3 Our client notices that the Council is making a number of village housing allocations (Long Hanborough, Stonesfield and Sipton-u-Wychwood for example) in its draft plan. Standlake is a similar village with a similar level of services and facilities (see below). Our client also notices that there are two allocations in Long Hanborough; a village next to the town of Woodstock where significant growth is also proposed. As such, it is suggested that an allocation in Standlake would not add to planned growth in a nearby settlement but would merely help support the existing services and</td>
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facilities within the village.

2.0 WEST OXFORDSHIRE LOCAL PLAN 2031 SUBMISSION VERSION INCLUDING PROPOSED MODIFICATIONS

Background

2.1 The Council first published a Draft Local Plan Part 1 in November 2012. The housing targets in that document were based primarily on South East Plan May 2009 figures extended on a pro-rata basis. The South-East Plan was revoked in March 2013.

2.2 Government guidance in paragraph 49 of the National Planning Policy Framework ("the Framework") states that local authorities should:
"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area"

The guidance goes on to state at paragraph 159 that local authorities should:
"prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period"

2.3 This guidance led the Oxfordshire local authorities jointly to commission an Oxfordshire Strategic Housing Market Assessment ("SHMA"), which was published in April 2014. This countywide SHMA pointed to a requirement for more housing than had been anticipated previously, which in turn resulted in higher housing targets across the County.

3.0 THE LEVEL OF HOUSING PROPOSED IN THE PLAN

3.1 The SHMA identified a requirement in West Oxfordshire for 660 dwellings per annum (dpa) or 13,200 over a 20-year plan period. In the initial submission version of the draft Plan, the Council argued that the housing figures in the SHMA for West Oxfordshire were based on an abnormally high period of housing building and that consequently, the figures for the district were too high and should be adjusted downwards.

3.2 The Examination in Public ("EiP") into the Submission Draft Plan opened in the autumn of 2015. Following the initial hearing sessions, the Inspector in his preliminary findings stated that the level of housing identified in the Plan was not justified. This led to the Examination being suspended to allow the Council time to carry out further work on the level of housing that should be identified in the Plan.

3.3 The Plan now provides for the full 13,200 dwellings as identified in the SHMA as well as 2,750 new dwellings to assist in meeting Oxford’s unmet housing need for housing (a figure agreed through the Oxfordshire Growth Board).

3.4 Our client supports the position now being adopted by the Council. Anything less
would have been untenable and would have brought in to question the soundness of the Plan.

4.0 STANDLAKE

4.1 Standlake is situated on the A415 approximately 5 miles southeast of Witney. Oxford lies some 10 miles to the east. As of January 2013, its population was approximately 1400.

4.2 In the Council’s draft plan, Standlake is in the ‘village’ category (as opposed to a small village, hamlet or open countryside) so is therefore considered by the Council as one of the more sustainable settlements in the district.

4.3 The Council’s Settlement Sustainability Report November 2016 lists facilities available in Standlake. These include:

- A Full Time Post Office
- A Primary School
- Retail Services
- Community Building
- A Public House
- A Place of Worship
- Playing Fields
- Petrol Filling Station
- Local Employment Opportunities
- Access to a Principle Road
- Daytime Bus Service

5.0 LAND TO THE SOUTH WEST OF DOWNS ROAD, STANDLAKE

5.1 Land to the South West of Downs Road, Standlake is a site of some 13.1 ha, located relatively central to the village. Our client believes the site could accommodate some 150–200 dwellings. An allocation in this location would ease the burden on some other settlements where massive growth is proposed in the draft plan. The following demonstrates further why the site would make an appropriate housing allocation.

Urban Form

5.2 The site is bordered to the east by existing residential development (Heyford Close) as well as to the south (The Glebe). Development of the site would not extend the village boundary into open countryside and would integrate well with the aforementioned existing development.

Access / Transport Links

5.3 Vehicle access can be achieved from Downs Road. A number of pedestrian and cycle links could also be provided to the village’s amenities. The St Giles Church Bus Stop is only some 400m from the site. Government guidance in its ‘Manual for Streets’ suggests a walking distance of 800m is appropriate. Table 1 below shows the regular bus services available at this bus stop.
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<th>Number</th>
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<tr>
<td>18 Stagecoach Oxford - Eynsham - Standlake - Bampton X15 Stagecoach Witney - Standlake - Kingston Bagpuize - Abingdon</td>
<td>Heritage and Ecology 5.4 The site is not within or next to a Conservation Area. It does not contain any buildings of historical importance and does not have any designated environmental constraints. Landscape 5.5 The site does not sit within or next to a designated landscape area. As it is next to existing built development, the area has already been urbanised to a good extent. Any development would be sensitive to the location and would add to the character of the existing and surrounding pattern of built form. Flooding 5.6 The site is within Flood Zone 1 which has the lowest risk of flooding.</td>
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6.0 SUMMARY AND CONCLUSIONS

6.1 It has already been established by the Council that Standlake is a sustainable location for development. The draft plan does not currently make any allocation in the village. An allocation here would help relieve some of the onus on settlements which have significant growth proposed for them in the draft plan.

6.2 Our client therefore suggests that Land to the South West of Downs Road, Standlake would make a suitable and sustainable allocation for the following reasons:

- The site sits within an already urbanised area of Standlake and has good transport links to Oxford and elsewhere. Any development would integrate naturally with existing higher density development.
- The site is not within a Conservation Area, nor does it contain any historically important buildings.
- The site is in Flood Zone 1 and is not constrained by an environmental or landscape designation.
- The site is available immediately for development.

We enclose a plan (Appendix 3) showing Sharba Homes interest at North Leigh (the area of land to the north of the farm only). We have submitted elsewhere that our discussions with the owners of Myrtle Farm, Long Hanborough have confirmed that this site is NOT available for development and that they have not themselves submitted details of the site for approval and nor have they authorised any party to do so on their behalf. As such, this 50 dwelling proposal is not an available option. The enclosed site at North Leigh can be considered as a suitable alternative given North Leigh is a sustainable location for development as shown by the recent consents there. The development can be screened with appropriate copse planting in the western corner and southern boundary. The site is unaffected by any designations or Eynsham Hall / Park, unlike other sites being promoted in the village. The site can accommodate a development of up to 85 dwellings at a maximum density of 30 dwellings per hectare which is considered appropriate for the area. We can facilitate...
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<td>MM780</td>
<td>North A40 Land Consortium</td>
<td>-</td>
<td>-</td>
<td>2134</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>As per proposed modifications Main Modification 148 and Main Modification 150, the Consortium generally supports the total indicative housing requirement of 5,500 homes for the Eynsham-Woodstock sub-area as a minimum threshold for housing delivery over the plan period. It is however, noted that such a figure should not be considered an absolute or ‘up to’ level of housing delivery. The Consortium therefore consider that the wording of relevant policies should reflect specified housing requirements as a minimum target. As such, the Consortium supports as a minimum that the proposed West Oxfordshire Garden Village will deliver around 2,200 new homes by 2031 to contribute entirely towards meeting the housing needs of Oxford City. It is noted at paragraph 9.5.40b that delivery is expected between 2021 and 2031, unless delivery can be accelerated. It is emphasised by the Consortium that development should come forward at an appropriate time, as informed by relevant technical evidence. Notwithstanding, the Consortium agrees that the delivery of new homes at the proposed Garden Village should be treated separately for the purposes of 5 year housing land supply.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2180</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Growth at Eynsham Growth along the A40 corridor at Eynsham is supported in principle. A planned package of improvements is in the conceptual design stages which currently includes a dedicated east bound bus lane from Eynsham to Oxford which will support growth in this location. A park and ride is also planned at Eynsham which will encourage growth along the A40 corridor to undertake sustainable, faster journeys to Oxford. The County Council welcomes further working with West Oxfordshire to secure more funding to enable further improvements along the corridor between Witney and Eynsham. Excellent pedestrian, cycle and public transport links should also be created from the outset to key destinations such Hanborough station and to other services and facilities.</td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2219</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Appendix 2 – Education Comments Woodstock 21. The Proposed Modifications Plan includes three allocations within Woodstock. A live application is currently being assessed for ‘Land East of Woodstock’ for 300 dwellings. The remaining two are to the north of Woodstock. 22. Oxfordshire County Council objects to the Land North of Banbury Road allocation (250 dwellings). The existing road network would be unable to accommodate the increase in housing without large scale mitigation measures and it is unclear how an allocation of 250 dwellings would be able to deliver this. Additionally the site is in an unsustainable location when considering access to key bus routes and to local amenities. 23. The allocation has further problems in that, together with the allocation ‘North of Hill Rise’ for 120 dwellings, the cumulative growth would be unable to be accommodated at the primary school without the county objecting to growth in the north of Woodstock ahead of a new site and primary solution being found. 24. Longer term this objection may need to be revisited should further allocations in Woodstock be made within the boundary of Cherwell.</td>
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Non-strategic sites totalling 670 homes are included for Woodstock, none of which provides a site for school provision. The current primary school is 1.5 form entry, and is full. This scale of development would require up to another form of entry of primary school provision. The school’s current site area would not support this scale of growth. It may be possible to expand the school, to 2 form entry, but the site area would be below government standards. It would not be feasible to expand it beyond 2 form entry, and therefore the scale of growth proposed incurs a significant risk of the school’s capacity being exceeded. The scale of growth is insufficient to make a new school viable. A more sustainable education solution could be provided with a larger scale of housing growth which brought forward a site for a new primary school building. This could be brought forward through a strategic allocation which includes land in Cherwell District Council. An alternative solution could be provided if land adjacent to the primary school site could be made available to facilitate the school’s further expansion. This could create opportunities for new community facilities in the heart of Woodstock.

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<tr>
<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Blackwell</td>
<td>2310</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>MAIN 150 – Table 9.4</td>
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<td></td>
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<td>2.26. In conjunction with other representations, the following points are raised:</td>
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<td>2.27. The sub-area housing target of 5,500 is noted, however, the table should be modified to ensure that there is total clarity between that part of the supply figure which is for Oxford’s unmet needs and that which is for West Oxfordshire. This will ensure that there is no uncertainty in calculating 5-year housing land supply for West Oxfordshire. In terms of the allocations made, concerns have already been expressed about the Myrtle Farm allocation and the Garden Village. However, notwithstanding that, the anticipated windfall figure of 324 could be further reduced by making additional allocations, notably for land at Long Hanborough (see Section 3 of this Document).</td>
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<p>| MM788         | Mr Murray and Mr Blackwell | Mr Murray and Mr Blackwell | Mr Murray and Blackwell | 2312 | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150 | 3.0 Omission Site - Land north of the A4095 |
|               |                        |                |                  |            |                  | 3.1. The purpose of this Section of the Representation Statement is to make the case for the allocation of the above site, as shown on the plans attached to this document. This is considered to be sound as it is consistent with the guiding principles in national policy. |
|               |                        |                |                  |            |                  | 3.2. In terms of the principle of development, given that the Plan is allocating additional housing to Long Hanborough and the evidence base supports additional development at the village in its role as a rural service center, it is considered that there is the ability to provide a site for an additional 50 dwellings, subject to masterplanning, in lieu of Myrtle Farm. |
|               |                        |                |                  |            |                  | 3.3. The land is being promoted by the site owners for development. It is available immediately and there are no legal barriers to its development. |
|               |                        |                |                  |            |                  | 3.4. Land North of the A4095 on the eastern edge of the village, between Park Lane and the railway line. |
|               |                        |                |                  |            |                  | 3.5. The attached plan shows the site along with an indicative layout, which was only for capacity testing purposes only. Could you please disregard the layout and utilise the attached plan for site identification purposes. |</p>
<table>
<thead>
<tr>
<th>Proposed Use</th>
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<tr>
<td>3.6. Residential Development - up to 50 units, which could be easily delivered in 5 years, subject to planning permission.</td>
</tr>
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<td>3.7. The Site can provide a mix of open market and affordable housing in accordance with relevant development plan policies.</td>
</tr>
<tr>
<td>Designations</td>
</tr>
<tr>
<td>3.8. The submission site is not subject to any site-specific designations in the emerging Local Plan.</td>
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<td>3.9. The site is not in the flood plain (flood zone 1) and is not immediately adjacent to it or a watercourse.</td>
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<tr>
<td>Analysis</td>
</tr>
<tr>
<td>3.10. In terms of the principle of development, the emerging Local Plan recognises Long Hanborough as a location for additional housing development.</td>
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<td>3.11. Therefore, the development of the site would be entirely consistent with the strategy already set out in the Local Plan and its development could make an important contribution to housing and supply in the District and could be justified (at its most basic level) by the units which are considered to come form windfall sites in the Eynsham and Woodstock Sub-Area. Therefore, in accordance with paragraph 55 of the Framework, additional development will help maintain the vitality of the village, by providing additional population and demand for the existing services and facilities already available in the village.</td>
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<tr>
<td>Access</td>
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<td>3.12. In terms of its accessibility, the site is located on the eastern edge of the village, sandwiched between the residential development of Park Lane and the railway line. As a result it has an urbanised context. The site enjoys direct access on the A4095 and there is a combined pedestrian footway/cycleway, which forms the southern boundary of the site. This provides a direct route into the centre of the village, being circa 1km distant. This is within walking/cycling distance for access to the primary school and the Co-Op supermarket, without the need to travel by private car. The A4095 is on a bus route, with bus stops a short distance to the east and west of the site.</td>
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<td>3.13. In addition to the services in the village centre, to the east of the site (on the opposite side of the railway line) is the business park and railway station. These can equally be accessed on foot or by bicycle.</td>
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<td>3.14. In highways terms, the A4095 runs east west past the site and is generally straight, with good visibility in either direction. The site can be accessed directly from the road, via an existing 5 bar wooden gate. The speed limit along this stretch of road is 30mph and there are examples of active speed control measures in the form of speed cameras and automatic warning signs, as well as passive measures, such as highways marking.</td>
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Landscape

3.15. As set out above, the site is not subject to any specific landscape designation. It is currently used as pony paddocks.

3.16. A review of the evidence base for the emerging Local Plan shows that the site has not been the subject of any form of landscape assessment. The 1998 Landscape Character Assessment for the District shows the site as being part of an area characterised as ‘semi enclosed valley-side farmland’ in the Lower Evenlode Valley sub area. Page 45 of the document considers that such areas are:

"visually sensitive and any development would need to be closely and sensitively integrated with existing buildings or with a strong landscape structure."

3.17. Whilst the age of the Landscape Assessment means that it clearly pre-dates the NPPF and PPG, even back in 1998, the Assessment provides a framework for the development of this type of site. In the case of this site, it is considered to be suitable for development because of its urbanised context and clear physical boundaries. In this case, whilst its allocation is sought it would equally be able to be delivered as a windfall site, compatible with policy H2 of the emerging Local Plan.

Proximity to the Railway

3.18. The proximity of the site to the Railway line is not considered to be a barrier to development. In supporting this position, the Network Rail response to planning application 15/03797/OUT (a residential development of 120 houses on the south side of the A4095) shows that there are no technical barriers to development in such proximity to the railway line.

Conclusions

3.19. As a result of the above, it is recommended that MAIN172 is replaced with a new policy allocating this site four housing development.

I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:

* Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.

* Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.

I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized
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| MM584         |                         | David Tomkins   | -                | Tomkins           | 2329       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM795         | Amalia Garcia Renoso    | Ms              | Garcia Renoso    | 2330              |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM796         | Alice Airey             | Ms              | Airey            | 2331              |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM797        |                        | Antony Airey    | Mr               | Airey             | 2332       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM798        |                        | Heloise O Hagan | Ms               | O Hagan           | 2333       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM799        |                        | Ann Bentley     | -                | Bentley           | 2334       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM800 | | Paul O Hagan | Mr | O Hagan | 2335 | > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM801 | | Claire Cadwaladr | Mrs | Cadwaladr | 2336 | > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM802         |                         | Helen Winpenny  | -                | Winpenny          | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM803         |                         | George Bentley  | Mr               | Bentley           | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM804         |                         | Flynn McGurrin  | -                | McGurrin          | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM805         |                        | Nancy McGurrin | Mrs McGurrin    | 2340              |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM806         |                        | Robert McGurrin | Dr McGurrin     | 2341              |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM807         |                        | Adrian Birkett  | Mr Birkett      | 2342              |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>MM808</td>
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<td>Eva García</td>
<td>-</td>
<td>Garcia</td>
<td>2343</td>
<td>I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:</td>
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| MM521|                         | Vivienne Insley    | -                | Insley     | 2344                                                   | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:                                                                                                                                                                                                                                   |
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| MM809|                         | Charles Mould      | Dr               | Mould      | 2345                                                   | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:                                                                                                                                                                                                                                   |
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<td>Richard Luke</td>
<td>-</td>
<td>Luke</td>
<td>2346</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM811</td>
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<td>Themis Avraamides</td>
<td>Mr</td>
<td>Avraamides</td>
<td>2347</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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<td>MM812</td>
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<td>Aileen Rogers</td>
<td>-</td>
<td>Rogers</td>
<td>2348</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock</td>
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| MM813        |                         | P Avraamides    | Dr Avraamides    | 2349              | Sub Area > MAIN 150 | * Land North of Banbury Road off Green Lane (250 houses):  
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| MM814        |                         | Marc Cadwaladr  | - Cadwaladr      | 2350              | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM815        |                         | Rosamund Campbell | - Campbell    | 2351              | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM816         |                        | Spencer Andrew Hughes | Mr Andrew Hughes | 2352       | > Eynsham Woodstock Sub Area > MAIN 150 |  pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses):  
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| MM817         |                        | Jennifer Chesterton |                | 2353       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
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| MM818         |                        | Ronald Chesterton  |                | 2354       | > SECTION 9 - STRATEGY | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM541         |                         | Mr M J Giles    | Mr               | Giles               | 2355       | AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | "Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed."
|               |                         |                 |                  |                     |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.
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|               |                         |                 |                  |                     |            | | I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM819         |                         | Roderic Ashton  | -                | Ashton              | 2356       | AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | "Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed."
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| MM820         |                         | Julie Ashton    |                  | Ashton            | 2357       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM821         |                         | Ruth Fiday      | Ms               | Fiddy             | 2358       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM822         |                         | Rosie Redpath   | Ms               | Redpath           | 2359       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM585         | G B Money and J Money   | Mr and Mrs Money | 2360            |                    | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM823         | D Jordon                | Mr Jordon      | 2361            |                    | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM824         | George Redknapp         | Mr Redknapp    | 2362            |                    | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>MM428</td>
<td></td>
<td>Stephen John Oliver</td>
<td>-</td>
<td>Oliver</td>
<td>2363</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM825</td>
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<td>S A Budden</td>
<td>Mrs</td>
<td>Budden</td>
<td>2364</td>
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<td>MM593</td>
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<td>K M Giles</td>
<td>-</td>
<td>Giles</td>
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<td>MM829</td>
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<td>Simon Fiddy</td>
<td>Mr Fiddy</td>
<td>2369</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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| MM830        |                         | Regent Lee     | Lee             | 2370       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM831        |                         | Claire Lee     | Lee             | 2371       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM832         |                         | Victoria Allen | Ms               | Allen             | 2372       | MAIN 150          | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM420         |                         | Charlotte Evans| Ms               | Evans             | 2373       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM833         |                         | D N Blair      | -                | Blair             | 2374       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| M834          |                         | Paul Allen      | Mr               | Allen             | 2375       | Woodstock Sub Area > MAIN 150 | and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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| M835          |                         | J Blair         | -                | Blair             | 2376       | Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| M836          |                         | P Wheatfill     | -                | Wheatfill         | 2377       | Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>MM837</td>
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<td>Samantha Thornley</td>
<td>Ms</td>
<td>Thornley</td>
<td>2378</td>
<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM838</td>
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<td>Janice Wheatfill</td>
<td>-</td>
<td>Wheatfill</td>
<td>2379</td>
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<td>MM839</td>
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<td>John Begley</td>
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<td>2380</td>
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<td>Nicholas Alcock</td>
<td>Mr</td>
<td>Alcock</td>
<td>2381</td>
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<td>MM263</td>
<td>Elizabeth Begley</td>
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<td>Begley</td>
<td>2382</td>
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| MM581        |                         | Clive Wilkinson | -               | Wilkinson         | 2383       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM841        |                         | David Parrott   | Mr              | Parrott           | 2384       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM842        |                         | Marth Willcox c/o Dr Willcox | Miss          | Willcox           | 2385       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM843         |                         | J Drewett       | -                | Drewett           | 2386       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM844         |                         | Andrew Fonteath | Mr               | Fonteath          | 2387       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM845         |                         | Sue Fonteath    | Mrs              | Fonteath          | 2388       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>MM846</td>
<td></td>
<td>Michelle Wheatfell</td>
<td>Ms</td>
<td>Wheatfell</td>
<td>2389</td>
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<td>Suzannah Harrison</td>
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<td>Harrison</td>
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<td>MM552</td>
<td>-</td>
<td>Trevor and Elaine Stokes</td>
<td>-</td>
<td>2392</td>
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<td>Pat Crutch</td>
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<tr>
<td>MM850</td>
<td>A A F Sussums</td>
<td>-</td>
<td>Sussums</td>
<td>2395</td>
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<td>Gardner</td>
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<td>MM418</td>
<td>J E Becker</td>
<td>Mrs</td>
<td>Becker</td>
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<td>MAIN 150</td>
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| MM560        |                         | Kim Evans       | Ms               | Evans             | Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM591        |                         | Angela Keeling  | Mrs              | Keeling           | Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM420        |                         | Charlotte Evans | Ms               | Evans             | Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>MM592</td>
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<td>William Keeling</td>
<td>Mr Keeling</td>
<td>2401</td>
<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150 bordering the heavily trafficked A44 will NOT provide a &quot;safe and suitable access&quot; or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM852</td>
<td></td>
<td>Mary Hawken</td>
<td>- Hawken</td>
<td>2402</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150 I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: * Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a &quot;safe and suitable access&quot; or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031</td>
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<td>MM853</td>
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<td>Francesca Rose</td>
<td>- Gibbons</td>
<td>2403</td>
<td>&gt; SECTION 9 I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:</td>
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| MM553         |                        | Gibbons        |                  |                    |            | * STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | * Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
* Land North of Banbury Road off Green Lane (250 houses):  
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Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and lung damaging air pollution in the area.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM249         |                        | Julia Johnson  |                  |                    |            | * STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | * Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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| MM854         |                         | Emma Klose      | Ms                | Klose             | 2406       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM855         |                         | Johnathan Owen  | Mr                | Owen              | 2407       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM557         |                         | Sarah Jane Airey| Ms                | Airey             | 2408       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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<td>MM856</td>
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<td>Natasha Airey</td>
<td>Ms</td>
<td>Airey</td>
<td>2409</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031</td>
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| MM857         |                         | Mark Edward Aston | Mr         | Aston             | 2410       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: 
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| MM858         |                         | Paul Wheeler    | -                | Wheeler           | 2411       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: 
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<td>MM859</td>
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<td>Philippa Allbrook</td>
<td>Ms</td>
<td>Allbrook</td>
<td>2412</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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<td>MM860</td>
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<td>Mr J Valentine</td>
<td>Mr</td>
<td>Valentine</td>
<td>2413</td>
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<td>Mrs M Valentine</td>
<td>Mrs</td>
<td>Valentine</td>
<td>2414</td>
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| MM862         |                         | David Maclean Watt | Mr              | Maclean Watt      | 2415       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM863         |                         | C J Taylor and J Taylor | Mr and Mrs     | Taylor            | 2416       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM864         |                         | S Yoxall         | Mrs             | Yoxall            | 2417       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>MM865</td>
<td></td>
<td>Philippa Maclean Watt</td>
<td>Mrs</td>
<td>Maclean Watt</td>
<td>2418</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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| MM866         |                         | Brian Yoxall | Mr | Yoxall | 2419 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM867         |                         | Sandra L Thompson | - | Thompson | 2420 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM868         |                         | Naomi Jones    | Ms               | Jones             | 2421       | Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM869         |                         | Fiona S Thomson| -                | Thomson           | 2422       | Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
  * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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| MM106         |                         | Richard Ede    | Mr               | Ede               | 2423       | Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM870         |                        | Shaun Thomson  |                | Thomson           | 2424       | > Eynsham Woodstock Sub Area > MAIN 150 | pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses):
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| MM871         |                        | Tony Rushworth |                | Rushworth         | 2425       | > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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| MM872         |                        | William Jones  | Mr             | Jones             | 2426       | > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150

* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.

* Land North of Banbury Road off Green Lane (250 houses):

The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.

Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.

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| MM875        |                         | Janet Seabrook | Ms              | Seabrook          | 2429       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM876        |                         | J Taylor       | Mrs             | Taylor            | 2430       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM877        |                         | David John Warren | -              | Warren            | 2431       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM878        | Gwendoline Berry        | -              | Berry            | 2432              |           | > SECTION 9       | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM879        | Carlo Bonasera          | Mr             | Bonasera         | 2433              |           | > SECTION 9       | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM880        | Eleanor Peters          | Mrs            | Peters           | 2434              |           | > SECTION 9       | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM881         |                         | Nicola Rushworth| -                | Rushworth         | 2435      | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM882         |                         | Steve Haynes    | Mr               | Haynes            | 2436      | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM883         |                         | Bryan Robertson | -                | Robertson        | 2437      | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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Carl Giffin  
Mr Giffin  
2438  
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**MM885**  
G Robertson  
Mrs Robertson  
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Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.

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Xavier Crepin  
Mr Crepin  
2440  
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* Land North of Banbury Road off Green Lane (250 houses):
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<td>MM887</td>
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<td>Carolyn Allen</td>
<td>-</td>
<td>Allen</td>
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<td>Taruna Sharma</td>
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<td>Sharma</td>
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| MM890         |                         | Mr G Symonds    | Mr              | Symonds           | 2444       | Sub Area > MAIN 150 | * Land North of Banbury Road off Green Lane (250 houses):  
The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
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| MM891         |                         | D Mortimer      | Ms              | Mortimer          | 2445       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM892         |                         | Shirley Symonds | -               | Symonds           | 2446       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>MM893</td>
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<td>Paul Mortimer</td>
<td>Mr</td>
<td>Mortimer</td>
<td>2447</td>
<td>&gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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<td>MM894</td>
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<td>Pamela Sanders</td>
<td>Ms</td>
<td>Sanders</td>
<td>2448</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM895</td>
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<td>Mark Willcox</td>
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<td>Willcox</td>
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<td>&gt; SECTION 9 - STRATEGY</td>
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| MM897         |                         | Vincent Walker  | -                | Walker            | 2451       | AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | * Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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| MM587        |                         | Maurice Allen   | -                | Allen             | 2452       | > SECTION 9 <STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM899        |                         | Pamela Evans    | -                | Evans             | 2454       | > SECTION 9 <STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM902        |                         | Kim Snell       |                  | Snell             | 2458       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM903        |                         | Jason Snell     | Mr               | Snell             | 2459       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM904        |                         | Lydia Powell    |                  | Powell            | 2460       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>Ms Burton</td>
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| MM913         |                         | Judy Tjan       | Ms               | Tjan              | 2470      | Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM914         |                         | S Andrew Banks  | Mr               | Banks             | 2471      | Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM915         |                         | Jane Whelan     | Ms               | Whelan            | 2472      | Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM916         |                         | Christopher Whelan | Mr Whelan       | 2473       | LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: 

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| MM917         |                         | Jane Davies     | Ms Davies        | 2474       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: 

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| MM918         |                         | Jennifer Atkinson | Ms Atkinson      | 2475       | > SECTION 9 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: 

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| MM919         |                         | I S Holyday     | -                | 2476       | - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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| MM922         | Matthew Alan Smart      | Mr Smart        |                  | Smart             | 2479       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM923         | Adriana Young           | Ms Young        |                  | Young             | 2480       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>Gwenllian Bullock</td>
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<td>Bullock</td>
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| MM930         |                         | D G Wild       | -                | Wild              | 2487       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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| MM931         |                         | Diane Hall     | Ms               | Hall              | 2488       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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| MM932         |                         | Alicia Wild    | Ms               | Wild              | 2489       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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| MM933         |                         | Robert Austin  | -               | Austin           | 2490       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. 
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| MM934         |                         | Margaret Sanders | Mrs            | Sanders          | 2491       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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| MM935         |                         | Doreen Goode   | Mrs             | Goode            | 2492       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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| MM937         |                        | Patricia Williams | Mrs | Williams | 2494       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM938         |                        | Paul Stonham | Mr | Stonham | 2495       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM941         |                         | Jill Porter     | Prof             | Porter            | 2499       | AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM942         |                         | R B Platt       | -                | Platt             | 2500       | AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM943|                         | M Platt           | -                | Platt              | 2501       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM944|                         | Jennifer Lambert  | Mrs              | Lambert            | 2502       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
  * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
  * Land North of Banbury Road off Green Lane (250 houses):  
    The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
    Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.  
    I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.                                                                                                                                                                                                                     |
| MM945|                         | Andrew Macaulay   | Mr               | Macaulay           | 2503       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
  * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
  * Land North of Banbury Road off Green Lane (250 houses):  
    The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
    Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.                                                                                                                                                                                                                     |
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<td>Raymond Lambert</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM404</td>
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<td>M J Allsopp</td>
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<td>Allsopp</td>
<td>2505</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a &quot;safe and suitable access&quot; or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM405</td>
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<td>Audrey Allsopp</td>
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<td>I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a &quot;safe and suitable access&quot; or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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</table>
| MM947         |                         | Ann Duffield   | Mrs             | Duffield          | 2507       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
  * Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
  * Land North of Banbury Road off Green Lane (250 houses):  
    The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
  Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.  
  I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM948         |                         | Margaret Orme  | Mrs             | Orme              | 2508       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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  * Land North of Banbury Road off Green Lane (250 houses):  
    The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
  Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.  
  I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM949         |                         | John Orme      | Mr              | Orme              | 2509       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
  * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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    The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
  Traffic accidents and lung damaging air pollution in the area.  
  I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.

I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.

**MM950**

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|               |                         | David Duffield  | Mr               | Duffield          | 2510       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
* Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031 |

**MM313**

| Respondent ID | Respondent Organisation | Respondent Name | Respondent Title | Respondent Surname | Comment ID | Document Full Path | Comment (plain text) |
|---------------|-------------------------| Rebecca Wynter  | Ms               | Wynter            | 2511       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
* Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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  The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031 |

**MM951**

| Respondent ID | Respondent Organisation | Respondent Name | Respondent Title | Respondent Surname | Comment ID | Document Full Path | Comment (plain text) |
|---------------|-------------------------| James McKenzie  | Mr               | McKenzie          | 2512       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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<td>MM952</td>
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<td>Stefanie McKenzie</td>
<td>Ms McKenzie</td>
<td>2513</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM953</td>
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<td>Angela Hughes</td>
<td>Ms Hughes</td>
<td>2514</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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<td>Joanne Rees</td>
<td>Mrs Rees</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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<td>Mr D Rees</td>
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<td>Rees</td>
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<td>Emilie Parry</td>
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<td>Glenda Grant</td>
<td>Mrs</td>
<td>Grant</td>
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| MM958         |                         | Rosie Redpath   | Ms               | Redpath           | 2519       | Woodstock Sub Area > MAIN 150 > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site adjoining the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
* Land North of Banbury Road off Green Lane (250 houses):  
The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM959         |                         | Ian Grant       | Mr               | Grant             | 2520       | Woodstock Sub Area > MAIN 150 > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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* Land North of Banbury Road off Green Lane (250 houses):  
The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and lung damaging air pollution.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM960         |                         | Philip Redpath  | Mr               | Redpath           | 2521       | Woodstock Sub Area > MAIN 150 > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and lung air pollution.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
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| MM961         |                         | Elaine Walker  | Mrs              | Walker            | 2522       | LOCAL LEVEL       | bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
* Land North of Banbury Road off Green Lane (250 houses):  
The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.  
Free movement of traffic is difficult enough as it is - generating more in Woodstock and surrounds makes it impossible, bottlenecks and pollution all round. There is a better way. Need not greed. |
| MM962         |                         | Marion Gadsby  | Mrs              | Gadsby            | 2523       | LOCAL LEVEL       | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents on Manor Road 7 the A44. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
* Land North of Banbury Road off Green Lane (250 houses):  
The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. |
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<td>MM963</td>
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<td>David Ellington</td>
<td>Mr</td>
<td>Ellington</td>
<td>2524</td>
<td>I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. I have personally made my objections known to the press, having been interviewed by an Oxford Mail/Times journalist. My exit onto the A44 from Manor Farm in Old Woodstock is exceptionally dangerous - an accident waiting to happen. Potentially 240 more cars is unthinkable in terms of road safety.</td>
</tr>
<tr>
<td>MM965</td>
<td></td>
<td>Suzannah Jackson</td>
<td>-</td>
<td>Jackson</td>
<td>2525</td>
<td>I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: * Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site adjoining the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and lung damaging air pollution. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM966</td>
<td></td>
<td>Lucy Carr</td>
<td>Ms</td>
<td>Carr</td>
<td>2526</td>
<td>I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: * Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site adjoining the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses):</td>
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<td><strong>MM583</strong></td>
<td>Ben Jackson and S Mabon</td>
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<td>-</td>
<td>Jackson</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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<td><strong>MM566</strong></td>
<td>Enriqueta Taylor</td>
<td>Mrs</td>
<td>Taylor</td>
<td>2528</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a &quot;safe and suitable access&quot; or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td><strong>MM967</strong></td>
<td>Adam Bailey</td>
<td>Mr</td>
<td>Baleley</td>
<td>2529</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock</td>
<td>I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a &quot;safe and suitable access&quot; or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.</td>
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</table>
| MM968         |                         | Huw Mason      | Mr               | Mason             | 2530       | Sub Area > MAIN 150 | * Land North of Banbury Road off Green Lane (250 houses):
The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.
Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM588         |                         | V E Allen      | Mrs              | Allen             | 2531       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.
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The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.
Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM969         |                         | Kay Bradford   | Ms               | Bradford          | 2532       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, |
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| MM970         |                         | Michael Davies  | Mr               | Davies            | 2533      | > Eynsham Woodstock Sub Area > MAIN 150 | pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
  * Land North of Banbury Road off Green Lane (250 houses):  
    The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.  
    Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.  
    I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031 |
| MM971         |                         | Jason Woolsey   | Mr               | Woolsey           | 2534      | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
  * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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    Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.  
    I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031 |
| MM972         |                         | Vipul Vyas      | -                | Vyas              | 2535      | > SECTION 9 - STRATEGY | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<tr>
<td>MM563</td>
<td></td>
<td>Minh Ha Duong</td>
<td>-</td>
<td>Duong</td>
<td>2536</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a &quot;safe and suitable access&quot; or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM973</td>
<td></td>
<td>Michael Noone</td>
<td>Mr</td>
<td>Noone</td>
<td>2537</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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| MM974         |                         | Kate Del Nevo  | Ms               | Del Nevo          | 2538       | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM975         |                         | T Bazeley      | Mr               | Bazeley           | 2539       | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
* Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM976         |                         | Matthew Del Nevo | Mr                | Del Nevo          | 2540       | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
* Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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<td>MM977</td>
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<td>Nicki Hale</td>
<td>Ms Hale</td>
<td>2541</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM549</td>
<td></td>
<td>Andrew Hill</td>
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<td>2542</td>
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<td>MM978</td>
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<td>K A Alderson Smith</td>
<td>- Alderson Smith</td>
<td>2543</td>
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| MM979         |                         | Sharon McGee   | Ms              | McGee             | 2544       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM980         |                         | Adam Bolter    | Mr              | Bolter            | 2545       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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Traffic volumes will increase on Banbury, Hensington and Shipton Roads with associated increases in traffic accidents and air pollution.  
I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM981         |                         | Leeanne McGee  | Ms              | McGee             | 2546       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>MM982</td>
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<td>Laura Bailey</td>
<td>Mrs</td>
<td>Bailey</td>
<td>2547</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM216</td>
<td>Harry Daniels and Jill Porter</td>
<td>Professor</td>
<td>Daniels</td>
<td></td>
<td>2548</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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| MM983         | Marie Stubbs            | Lady Stubbs     | Professor Daniels | Daniels          | 2549       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031: * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed. * Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an
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<td>MM984</td>
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<td>Katarzyna Jesionowska</td>
<td>Mrs Jesionowska</td>
<td>2550</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>MM985</td>
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<td>Marie Joan Woolliscroft</td>
<td>Ms Woolliscroft</td>
<td>2551</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
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<td>MM107</td>
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<td>Anne Ede</td>
<td>Mrs Ede</td>
<td>2552</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt;</td>
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| MM986 | | Nicola Walsh | Mrs | Walsh | MAIN 150 | **The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.**
| | | | | | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:
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| | | | | | The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.
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| | | | | | I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031. |
| MM987 | | R Beddard | Dr | Beddard | MAIN 150 | **The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.**
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| MM988 | | Michael Trumper | Mr | Trumper | MAIN 150 | **The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area.**
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<td>Arnaud Delas</td>
<td>Mr Delas</td>
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<td>June V Trumper</td>
<td>Mrs Trumper</td>
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| MM992         |                         | Paul McIntosh   | Mr McIntosh      | 2559       | - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | * Land North of Hill Rise - (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a "safe and suitable access" or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents on Manor Road 7 the A44. A similar planning application for this site was rejected in 2013. Nothing material has changed.  
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| MM993         |                         | Andrea Jackson  | Mrs Jackson      | 2560       | - SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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<td>Jean McIntosh</td>
<td>Mrs McIntosh</td>
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<td>MM132</td>
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<td>Ashley Jackson</td>
<td>Professor Jackson</td>
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| MM995        |                         | Janet Tomlinson | Ms Tomlinson     | 2564       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM605        |                         | Mary Ayres      | Mrs Ayres        | 2565       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM554        |                         | Andrew Rein     | Mr Rein          | 2566       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150 | I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:  
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| MM999        |                         | Mark John Wooliscroft | M | Wooliscroft | 2570 | LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150

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| MM1000       |                         | J E Walker | - | Walker | 2571 | LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 150

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<td>A G Walker</td>
<td>-</td>
<td>Walker</td>
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<td>MM1001</td>
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<td>Mary Jordan</td>
<td>Mrs</td>
<td>Jordon</td>
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<td>Jon Carr</td>
<td>Dr</td>
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<tr>
<td>MM100</td>
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<td>Sharone Parnes</td>
<td>Mr</td>
<td>Parnes</td>
<td>262</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area. I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.</td>
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<td>Jon Bright</td>
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<td>Bright</td>
<td>447</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>I am responding to the Local Plan consultation with regard to proposals for Eynsham. First, we are developing a Neighbourhood Plan. This is near completion and as it will be compliant with the Local Plan - should be the vehicle for managing growth in the Parish. Second, all the development (3,200 homes) proposed for the Village should be included in the Garden Village north of the A40. The village should not have to contend with a large, brand new settlement AND excessive development to the west. Third, the proposal to build 1000 homes to the west is wildly out of scale with the village and will wreck its rural character, prevent easy access to the countryside, and will generate unmanageable additional traffic. I very strongly object to the scale of this proposal. The sites in the west should be held in reserve and any prospective development limited to 400-500 inclusive of the Thornbury rd development. There certainly shouldn’t be any development south of Chilbridge. Fourth, the recently agreed speculative development on Thornbury road should be carefully planned so not all access is via Thornbury rd. Finally, we would ask that growth in Eynsham is carefully phased with the Garden Village given priority.</td>
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<td>MM3</td>
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<td>richard andrews</td>
<td>Mr</td>
<td>Andrews</td>
<td>54</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Comments are made on behalf of Eynsham Parish Council. Para 9.5.37 / Table 9.4: Comment: Unsound – options haven’t been assessed adequately and as a result lack of reserve sites may prejudice delivery of enough homes up to 2031. The changes to the LP make no allowance for non-delivery of any particular site. There is no reserve provision that we can see within district, sub-area or even within the SDA/AAP areas at Eynsham. Table 9.4 is typical, requirement is 5500 but total of proposed sites is 5474 showing no spare sites within the sub-region. In contrast, the Eynsham Neighbourhood Plan (ENP) accepts the figure of 3200 new homes within the Parish but which it considers would be better constructed within the new Garden Village north of the A40. There are strong indications from other ‘new communities’ that a new settlement of 2200 houses will struggle to fund the necessary infrastructure, especially on land that has been put forward for housing with the consequent...</td>
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<td>MM309</td>
<td></td>
<td>Phillip Parker</td>
<td>-</td>
<td>551</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>high expectation for the land value that will be realised. Building more houses, sooner, is the best way to minimise the risk of inadequate infrastructure provision. Developers will need to provide infrastructure before houses are built as there is no spare primary school capacity and obviously no roads; there will therefore be more than usual pressure from the financial backers of such a major project to build quickly to cover these costs - something that WODC should be focussing on to ensure a better build rate than has achieved over recent years. The ENP currently recommends 600 new homes to the west of Eynsham as its reserve site for development in the future, but with the possibility of development within the currency of the 2031 Plan if problems are found that delay or limit the delivery of new homes north of the A40.</td>
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<td>MM61</td>
<td></td>
<td>NP</td>
<td>Mr Pearce</td>
<td>582</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>MAIN 150, Para 9.5.37 Not sound Mention is not made here of a priority to build affordable homes for local people first. Will that be the case?</td>
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<td>MM332</td>
<td></td>
<td>Ms Couch</td>
<td>Ms Couch</td>
<td>632</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>9.5.37 query housing need—whether this is up to date and will it be reviewed post Brexit? What is the evidence that all WODC's share of Oxford's projected unmet housing need is best located at Eynsham, which has such poor infrastructure?</td>
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<td>MM357</td>
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<td>Tony Bovey</td>
<td>Mr Bovey</td>
<td>818</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 150</td>
<td>Table 9.4: too much development is proposed at and around Eynsham for reasons outlined above (disproportionality of scale, significant adverse impact on commuter flows on A40 and Toll Bridge, community integration, overwhelmed local services, constraints on providing more retail space in centre of Eynsham, dire impact of additional traffic on existing residential roads, social isolation of decanted Oxford overspill (especially for those in the bottom two quartiles of Oxford’s housing list) and likely infrastructure phasing delays. Council should reexamine the allocation of housing between Eynsham and Woodstock, which is objectively as well located to Oxford as Eynsham and where more development could be provided without harm to its historic core and Blenheim.</td>
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<td>MM445</td>
<td>Thames Valley Police - Simon Dackombe</td>
<td>Mr Dackombe</td>
<td>1022</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham</td>
<td>Para 9.5.40q - Please include reference for the need to potentially provide a police touchdown facility as part of the development (required on account of the scale of development, its isolated location and the need to provide a visible presence to integrate the existing and new communities).</td>
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1468</td>
<td>Woodstock Sub Area &gt; MAIN 151</td>
<td>Requirement for specific policy on Oxford Green Belt Given the large-scale development now proposed just outside the Oxford Green Belt at Eynsham, CPRE believes that WODC should bring forward a specific Green Belt policy which lays out the Council's policy and intentions in detail. References scattered through the text of the Plan to &quot;protecting&quot; &quot;acting in line with Government's Green Belt objectives&quot; etc. are not specific and so are difficult to apply to real situations. A Policy is needed not just to show the constraints which have been applied in the process of producing the Local Plan, but as a template against which future planning applications can be judged. This would also make sense in the context of Para 9.5.40h which refers to a potential extension of the Green Belt in the vicinity of the new Garden Village. Whilst this may be the desired outcome, the risk is of course that the alternative - encroachment onto the Green Belt - is the more likely proposal to come forward. A robust policy is therefore required to set out WODC's position.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>194</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 151</td>
<td>Could the 439 completed homes in Eynsham-Woodstock and/or the 716 with planning permission count towards the 5,500 for the sub-area?</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>583</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 151</td>
<td>MAIN 151, Para 9.5.38 Not sound Could the 439 completed homes in Eynsham-Woodstock and/or the 716 with planning permission count towards the 5,500 for the sub-area?</td>
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<td>MM357</td>
<td>Tony Bovey</td>
<td>Mr Bovey</td>
<td>819</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 151</td>
<td>Move the Oxford overspill from western SDA to Garden Village provided a western distributor road is built.</td>
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<td>MM49</td>
<td>Willow Environmental Solutions</td>
<td>Deirdre Mc Donal</td>
<td>Mrs</td>
<td>McDonald</td>
<td>100</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham</td>
<td>Local Business should be taken into consideration and protected in the delivery of this proposal. The creation of new houses should not create unemployment or destroy businesses of strategic importance for the County.</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>1009</td>
<td>Woodstock Sub Area &gt; MAIN 152</td>
<td>MAIN 152 paras 9.5.40a-c Strategic Development Areas at Eynsham Stagecoach recognises and concurs with the conclusion drawn by the Council from the evidence base before the Examination that, subject to suitable infrastructure being put in place, Eynsham and its immediate environs represents one of the most sustainable location to accommodate development, and in particular, help provide for the contribution the District needs to make towards meeting the objectively-assessed housing needs of the City of Oxford. It is evident that this potential should be dependent on the delivery of the radically improved levels of reliability and significantly reduced bus journey times that ought to be achievable when then committed A40 Science Transit Phase 1 is delivered, that will unlock the direct bus route from Eynsham to Oxford Northern Gateway and beyond to both the City Centre, and the Eastern Arc, which now accounts for about as many jobs as the central area. This new regular direct bus link will be essential to ensure that relevant attractive bus services will be available to a large number of motorists that today cannot take advantage of credible convenient public transport options. Stagecoach is already committed to putting such links in place when reliable journeys can be provided, following the delivery of the bus lanes. Strategic development in Eynsham, much of it directly related to the proposed Park and Ride site, will significantly assist in delivering a further critical mass of demand to support higher service frequencies, thus helping create and sustain sufficient volumes to provide services of still higher frequency, further assisting in the relevance and convenience of these services to potential users. At the same time it is worth noting that frequent services exist, and will continue, from Eynsham to both Witney and Carterton, offering an even fuller range of local journey options without the need to rely on personal car use.</td>
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<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1148</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>The ‘expression of interest’ in a Garden Village (GV) of 2,200 houses in Eynsham Area to accommodate the needs of Oxford’s industry is totally illogical. Building closer to Oxford, even in the green belt, would be more logical. Why no assessment of reviewing the Green Belt around Oxford, and locating more housing accessible to existing jobs, facilities, social networks and extended bus routes, without the necessity of commuting? The late inclusion of proposals for a ‘Garden Village’ of 2,200 houses adjacent to the A40 and to Eynsham, did not take account of the draft ENP and does not leave proper time for consideration if, owing to the constraints of the ‘Strategic Housing Market Assessment’, the Modified Local Plan has to be decided by March 2017. The proposed development of 3,200 new houses (EW1a and EW1b) will more than double the size of existing Eynsham Area (2000 houses) and will completely change the nature of Eynsham village. The quantum of development in and around Eynsham is disproportionate. The effect on the existing roads, facilities and services is obvious and severe. Creating and sustaining a balanced community (income, age, ethnicity, house type, etc) will be problematical, especially given the commuting to Oxford. The housing need targets in SMHA are unsubstantiable. Double the Government’s own forecasts! Produced to meet unelected developers’ and businesses’ aspirations. The building industry cannot and will not build to the target (inadequate capacity, too much supply reduces demand/ price, etc). The targets are more than double the previous building rates, which accepting the demand /supply decline after the 2008 Recession, are not</td>
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<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1180</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>The proposed development of 3,200 new houses (EW1a and EW1b) will more than double the size of existing Eynsham Area (2000 houses) and will completely change the nature of Eynsham village. The quantum of development in and around Eynsham is disproportionate. The effect on the existing roads, facilities and services is obvious and severe. Creating and sustaining a balanced community (income, age, ethnicity, house type, etc) will be problematical, especially given the commuting to Oxford. The housing need targets in SMHA are unsubstantiable. Double the Government’s own forecasts! Produced to meet unelected developers’ and businesses’ aspirations. The building industry cannot and will not build to the target (inadequate capacity, too much supply reduces demand/ price, etc). The targets are more than double the previous building rates, which accepting the demand /supply decline after the 2008 Recession, are not</td>
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<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1190</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>We are concerned about the highly biodiverse organic City Farm on the garden village site. The value of this site and the impact of development should be rigorously tested and full mitigation proposed.</td>
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| MM491        | Crest Strategic Projects | -              | Crest Strategic Projects | -              | 1573       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 152 | Main 152: Paragraph 9.5.40a-c  

9.18 As set out in response to Main 150 consideration should be given to increasing development at the proposed Garden Village to meet the full 2,750 dwelling requirement prescribed by the Oxford Growth Board (OGB). The Council has noted that development is not anticipated to come forward until after 2021, but there is potential for this to be accelerated. Concentration at the single SDA would allow for numerical and spatial ‘ring-fencing’ of the unmet need component of the housing land supply and would also offer potential scale-related benefits for infrastructure delivery and viability.  

9.19 It is recommended that the West Eynsham SDA be deleted as an allocation. In recognition of the need to provide flexibility and capacity, as part of the plan-making process, to adapt and respond to rapid changes the component of the proposed West Eynsham SDA allocated to help meet the unmet housing needs of Oxford City (550 dwellings) could be identified as a reserve housing allocation to be released if monitoring shows that the Garden Village is not being brought forward sufficiently quickly to respond to meeting the housing needs of Oxford. The site should be reserved only for this purpose with a strict release mechanism identified to ensure that the monitoring exercise relates only to the 2,750 dwelling requirement assigned under the duty to cooperate.|
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| MM733        |                         | Angie Titchen   | Dr Titchen       | 1696              | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 152 | Para 9.5.40 a-d: Strategic Development Areas (SDA) should have local Eynsham involvement. Although Tilgarsley, if it goes ahead, will eventually become a separate entity it will be very similar to Eynsham and will benefit from local knowledge and involvement during the Area Action Plan (AAP) stage (para 9.5.40h) and early build stages.  

I support this involvement because although I accept the concept of a garden village and am not against new development on the west in Eynsham, I am concerned that there could be adverse environmental, ecological and social consequences from building a Garden Village on this site. I say more about this below.  

Para 9.5.40b-c: I am extremely concerned about the total number of new homes proposed in the West Oxfordshire Garden Village and the West Eynsham SDAs. We are not NIMBYs in Eynsham and, as you know, we have embraced and planned for substantial, sustainable development of approximately 600 houses on the west and exploration of a small development on the north, if the A40 was re-routed. This planning was guided by the principle that new residents in Eynsham Parish should enjoy the same much-loved rural character, village feel, services and community spirit that current residents do. However, seeing the figures, I am worried that the huge number of homes overall will almost double the size of our village by 2031 and, I fear, will change it for the worse irreversibly. And I understand there are plans to add another several thousand homes in the life of the next Local Plan. I am aware that the WO Garden Village is to be separate in terms of its infrastructure, but the siting of it in the WODC Expression of Interest, so close to our northern boundary (the A40), belies a social, spatial and visual separation (of which more later).  

3.MAIN 153:  

Para 9.5.40d: I agree with these principles.  

Para 9.5.40e: I strongly disagree that the site has no significant physical constraints. There are known serious flood risks, endangered and vulnerable arable plantlife and a designated Local Wildlife Site. There are also likely to be archeological remains at Tars Grave and on the medieval village of Tilgarsley site. Robert Crocker who farms most of the land within the Garden Village site has been using a farming method to control flooding in this area over recent years and he is concerned that when the land is concreted over, flooding will become a serious risk to the south (presumably including the A40 and Eynsham). He also has wildlife survey evidence (plants, birds, insects, moths) over several years on this land. He is someone who could be invited to contribute to the AAP on these matters?  

I have also heard from a local resident that his relatives own some land within the proposed site (Expression of Interest) and they have refused numerous approaches to sell their land. They do not intend to sell now.  

I imagine that these and similar issues will emerge when the AAP is developed and rigorous enviromental, ecological and archeological surveys are commissioned by WODC.  

Para 9.5.40 h-r: various features of Tilgarsley Garden Village are noted – many of them good ideas – but there should be a commitment to investing in the Area Action Plan as soon as possible, if necessary using local WODC resources.  

I am concerned that the idea of the Garden Village meeting Oxford’s unmet need or an overspill community is actually a sham. It can only be, just an addition to the national pool of new houses, as there are no means by which developers could be forced to sell only to those who currently live or work in Oxford.  

Para 9.40h: Matters of delivery and phasing are critical for me too. If unthought-through and carefully
managed, this delivery, not only for the developing the Garden Village but also the western development could be fatal for Eynsham, given the current and ever increasing traffic congestion on the A40 and in the village centre at peak times. Moreover, the risk of gravel extraction forever looms large around Eynsham and, I understand, most recently on the land immediately east of the Garden Village, north of the A40.

I do not agree with a focussed Oxford Green Belt review for the purpose of building further houses close to the Garden Village. I do, however, support a wider review because I agree strongly with Professor Danny Dorling (see http://www.oxfordtoday.ox.ac.uk/features/how-solve-oxfords-growing-housing-crisis) that, on environmental and social grounds, Oxford’s unmet housing need should be provided near the city limits of Oxford. I understand that Oxford City will review their Local Plan and that WODC should input into this process to make sure that Oxford City bring forward all suitable options within their Green Belt or brownfield sites.

Para 9.5.40i: Regarding accelerating the lead-in time to construction, it is essential that infrastructure is built first, so that residents of the first phase of houses built have all the services they need when they move in. Eynsham’s infrastructure cannot cope with providing a transition period until full services are ready on the new sites. Developers often prefer to build houses first so they can re-oup their investment early by selling them before the infrastructure is built. This need not be the case. The Dorchester Living Group built and completed a 850-pupil school in Heyford Park before building a single house. If Eynsham is expected to provide an infrastructure transition period then, funding to provide temporary accommodation/ provision, for example, extra consulting rooms at Eynsham Medical Centre, will have to be made. This of course would be a waste of money in the long run.

Para 9.5j: Genuinely affordable housing is essential and houses for long-term renting should be built to high standards too as so many people are likely never to be able to afford to buy their own home in the foreseeable future. Sheltered accommodation and a care home should also be built.

Para 9.5k-l: I have very mixed feelings about the Science Park for several reasons. The first relates to the point I make above about the Garden Village not necessarily being populated by researchers, academics and scientists from Oxford, they may be people who work in London, Witney, Oxford or anywhere else in West Oxfordshire. Second, I am not sure that servicing the Science Park (e.g. cleaners, caterers) would be the reason people would go to live there (or could afford to live there). There are probably many residents of Eynsham who might offer those services, but it is likely that they would drive there, thus adding to air pollution and congestion! Third, I have seen no evidence that Oxford Brookes or University of Oxford need this Science Park – there are already a number in and around Oxford. Are the universities sponsoring the Science Park? Is OXLEP going to find funding for all of it? Who else is going to fund it? Especially in the light of Brexit, many researchers are going to find it difficult to be principle investigators on EU funded projects and already, some research projects are foundering due to our impending withdrawal from the European Union. Don’t forget too, that Eynsham has several business parks and the ones on the south are half empty and becoming derelect. I would hate to see a similar fate for the Science Park. Also, why not consider building a Science Park if it is supported on a brownfield site within the Southern Industrial Estates?

Para 9.5m-p: We all know that OCC plans for a Park & Ride and an east-bound bus lane into Oxford are entirely insufficient for improving the A40 problem we have now, let alone when there is the increased traffic from all the new developments in West Oxfordshire. WODC needs to work with OCC to develop a visionary plan for West Oxfordshire including a light electric railway that connects up Carterton, Witney, Woodstock, Eynsham and Oxford. Only then will any of the Local Plan really work and get people out of their cars. Hanborough station is inadequate at the moment as you know also know. The platform would need
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| MM745         | Gladman Developments Limited | Richard House (Gladman) | Mr House | 1798 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 152 | 10.1 Modifications (152 - 155) in combination propose the allocation of two Strategic Development Areas at Eynsham; West Oxfordshire Garden Village for 2,200 dwellings north of the A40 at Eynsham and land west of Eynsham for 1,000 dwellings. Whilst Gladman has no objection to the concept of new settlements and strategic urban extensions as sustainable means of providing new homes and associated infrastructure, it has concerns about the process of site selection that has been undertaken in respect of these two sites. In particular, it is concerned that all reasonable alternatives for development at Eynsham, the Eynsham/Woodstock Sub-Area and for the location of a new garden village do not appear to have been considered in the Sustainability Appraisal update (Oct 2016) that has been prepared by the Council to accompany the Main Modifications Schedule.  
10.2 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.  
10.3 The Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected.  
Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.  
10.4 Paragraph 3.11 of the 2016 Sustainability Appraisal Update explains that in considering strategic options for growth at Eynsham, consideration was given to the Oxford Growth Options Study prepared by LUC in July 2016 for the Oxfordshire Growth Board. That document considered only three strategic options for the Eynsham area: North, West and Eynsham Park Estate (applicable to land north of the A40 at Barnard Gate) that have never previously been considered. No additional Call for Sites exercise was undertaken by the Council to find sites that might fulfil this objective. The update goes on to say that the North and West options were progressed as reasonable alternatives as they were closest to Oxford and most likely to be deliverable. The Eynsham Park Estate site north of the A40 at Barnard Gate was not progressed as it had not been actively promoted and was found to have a number of major negative sustainability impacts.  
Barnard Gate New Village – Land to the South of the A40  
10.5 Gladman has an interest in 228 hectares of land to the south of the A40 at Barnard Gate. The site is of sufficient scale to accommodate the development of a new community and of sufficient size to provide the infrastructure required to support the new housing which can include, but is not limited to, major road lengthening and a double track laid to enable more frequent trains. When that and bus connectivity as set out in 9.5.40p are done, then this might work.  
Para 9.5.40q providing all the necessary facilities in the new village is good but Para 9.5.40r – good links between Eynsham and Tilgarsley (without the unnecessary and impractical 'iconic bridge') may be used by developers to back-pedal on building expensive infrastructure. Para 40q should be a binding principle, Para 40r is a nice benefit except that safe crossing must be provided for students attending Bartholomew School which should be listed in Policy EW1a.4. |
Improvements along the A40, a new Science Park including a new Park and Ride facility, which can complement a nearby scheme at North Eynsham. The scheme can also provide a new community central hub which can include local shops, a new primary school and community buildings. The settlement could be designed in such a manner that key facilities were accessible for all residents on foot or by bicycle with emphasis placed on sustainable modes of transport.

10.6 The site is within a single ownership and there are no legal barriers which hinder the delivery of development. The Environment Agency’s flood maps confirm the land is not at risk of flooding and the topography of the site means it is readily developable. In the absence of physical or legal barriers the site is deliverable and well placed to make a positive contribution to meeting the identified housing need.

10.7 The site is removed from existing settlements whilst being on a key arterial route. As such, development can be accommodated with minimal disruption to existing residents and accessible without need for additional traffic on rural roads or through local villages whilst occupiers of the new homes would benefit from existing and enhanced sustainable transport connections. The A40 passing the site is presently served by up to four buses every hour to Oxford, Witney and Eynsham providing a viable sustainable transport route for the site. The proposed development is of a sufficient scale to deliver significant infrastructure enhancements, including upgrades to the A40 corridor to the benefit of the broader area.

10.8 A Vision Document for the proposed development has been produced and is attached at Appendix 1 to this submission. As demonstrated in the Vision Document attached, Gladman considers that land south of the A40 at Barnard Gate presents a viable, realistic and preferable alternative to the large-scale expansion of Eynsham as it can deliver a similar range of uses and quantum of housing but with the following added advantages:

- It has a single landowner who has demonstrated a willingness to progress this site and has already started working with a promoter with the necessary expertise and consultant team actively developing proposals;
- Given its separation it can command an identity of a new settlement rather than an extension of Witney or Eynsham but it is conveniently located to ensure the proposal can be designed to avoid any unacceptable impacts to existing villages/towns;
- Being located equidistant from Witney and Eynsham, the impact of the development on local established communities would be lessened with the choice of destination for residents to access services and facilities if necessary;
- It has potential to utilise a more sustainable source of electricity from the solar farm on the north side of the A40;
- It can safeguard/contribute to the future aspirations for highway improvements along the A40;
- Due to the above (and unlike the Eynsham North proposals) it can make a meaningful contribution to housing delivery within the plan period and therefore a sound and valuable addition to the emerging Local Plan.

10.9 As the Council has not considered this site as a reasonable alternative location for strategic growth the Sustainability Appraisal Update is unsound.
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<tr>
<td>MM780</td>
<td>North A40 Land Consortium</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2135</td>
<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>forward in the period 2021-2031. We assert that the Site could come forward in a quicker timescale and that there is no beneficial reason for delaying development in this for the next five year period, particularly given the intrinsic linkage to the Park &amp; Ride/A40 Access (see below). We do not consider that this aspect of the modification is positively prepared justified and is not sound.</td>
</tr>
<tr>
<td>MM83</td>
<td>CPRE West Oxfordshire</td>
<td>Mrs M Fletcher</td>
<td>Mrs</td>
<td>Fletcher</td>
<td>227</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>Although I strongly believe that more housing is needed and it would seem that WODC has responded to criticism, by Local Plan inspector, in planning for a new garden village adjacent to Eynsham. 1000 houses are already proposed for the west of Eynsham. Building 4000 houses to the north of the A40 creates a new town. Eynsham is a village and the centres mostly residential, based on a pattern of narrow medieval streets and a small square bordered by the church a pub and small cottages. There are other places in West Oxfordshire which could easily accommodate extra housing on a larger scale. Both Woodstock and Chipping Norton have commercial town centres. Oxfords unmet housing need could be dispersed around West Oxfordshire and a smaller settlement of up to 2000 houses would still cause some harm to Eynsham but would be more acceptable.</td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2296</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>Although specific issues, such as access to local community facilities on foot and by bicycle are mentioned, no general statement on wanting to positively influence the health and wellbeing of the West Oxfordshire Garden Village is included within Broad principles. Key general points to consider including might be: Encouraging the development of an environment which: * provides opportunities for people to be more active, * provides opportunities to make healthier food choices * fosters good mental health and wellbeing by increasing opportunities for social interaction/reducing social isolation and loneliness * enables people to maintain their independence for longer.</td>
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<tr>
<td>MM89</td>
<td>Richard</td>
<td>Prof McManus</td>
<td>-</td>
<td>-</td>
<td>233</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>Allocating the whole of Oxford's excess allocation of unmet need to Eynsham and surrounding area is inappropriate because a) There is insufficient infrastructure in Eynsham compared with other sites where less than 500 houses could easily be accommodated. b) the A40 is already extremely busy. Not withstanding the proposed park and ride, more than doubling the population of Eynsham will put excessive strain, there are several other areas where housing could be built on</td>
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a green field site either with transport (e.g. rail) or nearer Oxford - e.g. surrounding Stanton St John.

c) Allocating 1000 houses to West Eynsham is inappropriate because about half the site is either floor plain or school playing field. The density of housing required will present a visual eyesore and is inappropriate for a village.

d) at least 250 local need houses could be built in the garden village site rather than west of Eynsham

e) The proposed link roads are inappropriate on the basis of cost, lack of wider economic benefits, serious landscape, amenity and environmental harm.

All in all these changes, which are excessive, appear ill thought out.

I reply to this latest consultation as a respondees to the first one and as a participant in the Examination last year. I therefore want my original comments to remain as they are with the following modifications

1. The level of additional demand to be met in WODC area meets my concern that it was unsound to separate out the allocations to meet local demand and the unmet Oxford demand as separate exercises

2. The making of an allocation to Eynsham area in principle meets a concern I had that without a specific allocation it would create a charter for the ad hoc and uncoordinated development of the area - and the potential that many proposals would only be resolved through a PLI

3. There however is a still a concern that the the proposed ‘new village’ to the north of Eynsham has not been through a thorough evaluation and consultation process of the particular proposal submitted to CLG nor of the alternatives. It also treats this provision as a separate and in effect unrelated exercise from the expansion of Eynsham in the west and south, when they should be treated as single planning process for the expansion of the village

4. Therefore if the total allocation is confirmed then the local plan should hold back from making site specific allocations but require this combined aggregate allocation for the Eynsham area to be brought forward though the Action Area planning process combined with the Neighbourhood plan

The majority of housing in the proposed Garden village and a sizable % of houses to the west are being proposed for Oxford’s unmet need, this is not enforceable unless new home owners are vetted to ensure they fulfil the criteria - developers will not soley sell to Oxfofds unmet need residents. Once purchased the house will also then be-able to be resold on the open market - the unmet need becoming a need again (or rented on the open market)

EYNSHAM:

I believe I will feel the same as many people when I say that the huge urban expansion of the Eynsham area will fundamentally change West Oxfordshire for ever. I believe as do many others that the housing and growth projections are fundamentally floored for Oxfordshire, and it is these that will see more than 3000 houses plus a huge employment site built in the Eynsham area. This is very disappointing.

I can only hope that as a council WODC take their time to ensure that both the ‘Garden Village’ and the 1000 home western extension are exemplar development sites with the best possible...
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<tr>
<td>MM163</td>
<td></td>
<td>Eleanor Chance</td>
<td>-</td>
<td>Chance</td>
<td>408</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>provision of infrastructure, services and environmental improvements possible. I hope you will look around the country at some truly incredible sites such as the Kingsbrook development in the Aylesbury, which is a collaboration between Barratts, RSPB and Aylesbury Vale District Council to build 2,400 homes and create a site of near 50% green infrastructure, plus new roads, schools and employment.</td>
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<tr>
<td>MM3</td>
<td></td>
<td>richard andrews</td>
<td>Mr</td>
<td>Andrews</td>
<td>55</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>Housing: 9.5.40b The last-minute inclusion of a proposed 'Garden Village' north of the A40 to help house Oxford's 'unmet need' is totally wrong. Oxford needs to deal with its population problems by dealing with the Green Belt south of the city. The citing of a village here would be a disaster environmentally (WOtDC has unerringly picked farmland of the highest environmental value and a very special recycling site). They obviously have not taken into account how the A40 would cope, or the problem of rain water management. And, obviously, it is the opposite side of Oxford from the majority of employment and the hospitals. Oxford should look south and east. 9.5.40b&amp;c The 'Garden Village' proposal plus extra housing to the west of Eynsham would double the housing in Eynsham. This is totally disproportionate. The infrastructure of Eynsham is already at breaking point.</td>
</tr>
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Comments made on behalf of Eynsham Parish Council:

Para 9.5.40 a-c: Comment: Unsound – poor assessment of the alternatives will risk delivery of enough homes - no consideration of single SDA or justification for uncoordinated SDAs.

While the establishment of a Strategic Development Area (SDA) is a good way of ensuring the best outcome from a large development, establishing two separate SDAs on either side of the A40 will result in poor co-ordination between two sites that should be planned, at least in the early stages, to ensure. (We make no distinction between SDA and AAP - there should be one of each)

"Separation and connection of the two settlements shall be made as necessary for mutual benefit and where no significant long-term harm will be caused by one community to the other". ENP v1.3 Para. 16.1.

The ENP notes that connection will be important for:

* Secondary schooling that will be at Bartholomew School for both communities, but may require some extra building on a new site – a sixth form college has been suggested – as the Eynsham site cannot easily accommodate any more building.
* Road connection to the A40 where minimising the junctions will lessen delays to through traffic. There should also be a protected route to allow for improvement to the A40.
* Primary health care - as there are indications that there may be some difficulty ensuring adequate provision on both sites.
Green infrastructure will be an important element in both connecting the communities by foot / bicycle and in screening each from the other and the A40.

Inevitably the first residents of the new settlement will need to use some facilities within Eynsham on a temporary basis while their own are constructed.

Although the ENP suggests that West Eynsham should only be a reserve site for the 2031 Plan, it does accept that the site can be developed at some point and it is best to ensure this is done in co-ordination with its neighbouring site from the outset.

Interestingly, Section 7 - Transport - does treat the AAP as applying to the whole Eynsham area when considering transport matters.

The ENP also recommends that Eynsham Parish Council in the first instance provides some local representation on the AAP.

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<tr>
<td>MM325</td>
<td>Posy</td>
<td>Mrs Parrinder</td>
<td>597</td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
<td>See attached letter and supporting documents</td>
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<tr>
<td>MM332</td>
<td>Ms Couch</td>
<td>Ms Couch</td>
<td>633</td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 152</td>
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| MM388         | Ainscough Strategic Land | Ainscough Strategic Land | 887             |                   | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 152 | Eynsham – Woodstock Sub-area (MM152)  
4.49 Two completely new SDAs are proposed within the Eynsham sub-area; the Garden Village SDA26 which is to become a new Rural Service Centre and West Eynsham SDA. These two SDAs will provide a total of 3,200 homes within the sub-area.  
4.50 It is noted that the Garden Village SDA is proposed as a new, separate Rural Service Centre. However, it is feasible that its role and function would be more akin to a Main Service Centre, especially when coupled with Eynsham. The Garden Village SDA is located next to Eynsham, separated by only the A40, and the Proposed Modifications seek to ensure good links across the A40 so that residents in Eynsham will be able to gain access to the Garden Village services, facilities and amenities and vice versa so that the two Rural Service Centres complement rather than compete with each other27.  
4.51 Furthermore, Eynsham itself is subject to a western extension in the form of the West Eynsham SDA. It is therefore clear that whilst the Eynsham-Woodstock sub-area does not currently have a Main Service Centre, |


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<tr>
<td>MM49</td>
<td>Willow Environmental Solutions</td>
<td>Deirdre Mc Donald</td>
<td>Mrs</td>
<td>Mc Donald</td>
<td>101</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 153</td>
<td>the two SDAs within this sub-area will change the character of this part of the district.</td>
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<td>This is unsound. My concern regarding the Eynsham Village Development is that it incorporates my clients main base of business operations for a recycling site with has permanent planning permission. It also incorporates the access.</td>
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<td>This site is of strategic importance not just to my client but as identified in the Oxfordshire Minerals Local Plan. This site is identified as a site of strategic importance to the County. This site is ideally located just outside Oxford, the main creator of waste in the County. The site is located on a Highways Truck Road with good access and I believe its existence has been overlooked for this entire proposal.</td>
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<td>Surely it would be more sustainable to include this operation in the proposal and with appropriate buffer zones, this site should be able to co-exist and indeed moved waste from the construction of this proposal and maybe even supply recycled aggregates across temporary internal roads to avoid movements on the highway.</td>
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<td>This site makes a major contribution to aggregate recycling in the county, there is an overriding need for this site and this site is of major importance as a recycling site for the future of the County.</td>
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<td>My client employee over 100 local people and should this site not operate, these jobs would be at jeopardy. This business and the workforce should be protected.</td>
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<td>Also it should be noted that the surrounding land has been infilled and there are methane vents around the adjacent land. This would also need to be considered.</td>
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>1011</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 153</td>
<td>MAIN 153 paras 9.5.40d + West Oxfordshire Garden Village (“Tilgarsley”)</td>
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<td>Providing “integrated and Accessible travel opportunities” from the proposed site, demands that the fullest possible integration is achieved with the proposed outer Park and Ride site that forms part of Science Transit Phase 1, to be delivered by 2020, and therefore before this site is anticipated to come on-stream to meet Oxford City’s unmet needs, nominally after 2021.</td>
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<td>This dependency is critical in the view of Stagecoach, as it will allow initial phases to benefit directly from high frequency, reliable and direct bus services to a full range of destinations, if they are brought forward as close as possible to the P+R site; and if suitable connectivity is provided across the site boundary for pedestrians and cycles in particular. In the longer term, as demand further grows, it needs to be possible to run bus services terminating within the Garden Village directly through the P+R site to the continue to Oxford City in particular. Such an arrangement will maximise the frequency, and therefore the attractiveness, of the bus service offer at the Park and Ride. It will also help sustain the highest possible frequency of bus services to the Garden Village, as the synergies between locally-arising demand and that from P+R users will create a greatly higher overall combined demand for an integrated service provided in this manner, which can be exploited. This will be essential to making the “fullest possible use” of public transport, as required by NPPF paragraph 17, to best mitigate the transport impacts of the proposals; all the more so as the allocation is expressly proposed to meet housing needs arising outside the district in Oxford City.</td>
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<td>Without specific language in the Plan requiring this connectivity to provided between the Garden Village and the P+R site, the Plan will be ineffective and therefore unsound.</td>
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<td>Stagecoach proposes that the Plan should be modified at para 9.5.40 (d) to read:</td>
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<td>* Providing integrated and accessible transport opportunities, including effective pedestrian, cycle and public transport permeability between the Garden Village Site and the proposed Eynsham Park and Ride</td>
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### Historic England makes no comment on the principle of the Garden Village proposal but paragraph 9.5.40e or one of the subsequent paragraphs should recognise that the site contains City Farm, a complex of grade II listed buildings and structures. Paragraph 126 of the National Planning Policy Framework requires local planning authorities to recognise (in their local plans) that heritage assets are an irreplaceable resource and to conserve them in a manner appropriate to their significance, and paragraph 132 of the Framework requires great weight to be given the conservation of heritage assets.

### Commercial Estates Group

Specifically, the opportunity provided by land adjacent to Hanborough Station has been wholly ignored in the Council’s process of assessing the most appropriate locations for strategic and non-strategic additional allocations.

This has resulted in the highly unusual position whereby the selected strategic options noted at paragraph 9.5.40o are not directly served by rail but the Council identifies, as a major benefit, the proximity of the proposed allocations at Eynsham to Hanborough Station and the potential to create high quality linkages to Hanborough Station.

The opportunities adjacent to Hanborough Station are of course immediately adjacent to this increasingly important transport hub and as such, and unlike locations at Eynsham or elsewhere, allow for people to walk to the station rather than a need to create wholly new linkages, over a distance of 3km, to it.

### Part of the site, near Lower Road has flooded in the past.
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<tr>
<td>MM55</td>
<td></td>
<td>Catherine</td>
<td>Mrs</td>
<td>Baker</td>
<td>129</td>
<td>I believe the plan to build the Garden Village so close to the existing village of Eynsham will mean that the two settlements will not be separate - they will naturally form a town consisting of two halves divided by a busy main road, with resulting dangers and inconveniences for all residents. As noted by other respondents, Garden Villages are intended to be separate from other settlements, and the proposed Garden Village will not be separate from Eynsham because of its proximity and the likelihood of sharing services between the two areas.</td>
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| MM491         | Crest Strategic Projects | Crest Strategic Projects | - | Crest Strategic Projects | 1579 | Main 153: Paragraph 9.5.40d  
9.20 The quantum of development at the Garden Village SDA should be increased to 2,750 dwellings. |
| MM733         | Angie Titchen           | Dr Titchen      | -                | Titchen           | 1697 | Para 9.5.40 a-d: Strategic Development Areas (SDA) should have local Eynsham involvement. Although Tilgarsley, if it goes ahead, will eventually become a separate entity it will be very similar to Eynsham and will benefit from local knowledge and involvement during the Area Action Plan (AAP) stage (para 9.5.40h) and early build stages. I support this involvement because although I accept the concept of a garden village and am not against new development on the west in Eynsham, I am concerned that there could be adverse environmental, ecological and social consequences from building a Garden Village on this site. I say more about this below. Para 9.5.40b-c: I am extremely concerned about the total number of new homes proposed in the West Oxfordshire Garden Village and the West Eynsham SDAs. We are not NIMBYs in Eynsham and, as you know, we have embraced and planned for substantial, sustainable development of approximately 600 houses on the west and exploration of a small development on the north, if the A40 was re-routed. This planning was guided by the principle that new residents in Eynsham Parish should enjoy the same much-loved rural character, village feel, services and community spirit that current residents do. However, seeing the figures, I am worried that the huge number of homes overall will almost double the size of our village by 2031 and, I fear, will change it for the worse irreversibly. And I understand there are plans to add another several thousand homes in the life of the next Local Plan. I am aware that the WO Garden Village is to be separate in terms of its infrastructure, but the siting of it in the WODC Expression of Interest, so close to our northern boundary (the A40), belies a social, spatial and visual separation (of which more later).  
3.MAIN 153: Para 9.5.40d: I agree with these principles. Para 9.5.40e: I strongly disagree that the site has no significant physical constraints. There are known serious flood risks, endangered and vulnerable arable plantlife and a designated Local Wildlife Site. There are also likely to be archeological remains at Tars Grave and on the medieval village of Tilgarsley site. Robert Crocker who farms most of the land within the Garden Village site has been using a farming method to control flooding in this area over recent years and he is concerned that when the land is concreted over, flooding will... |
become a serious risk to the south (presumably including the A40 and Eynsham). He also has wildlife survey evidence (plants, birds, insects, moths) over several years on this land. He is someone who could be invited to contribute to the AAP on these matters?

I have also heard from a local resident that his relatives own some land within the proposed site (Expression of Interest) and they have refused numerous approaches to sell their land. They do not intend to sell now.

I imagine that these and similar issues will emerge when the AAP is developed and rigorous environmental, ecological and archeological surveys are commissioned by WODC.

Para 9.5.40 h-r: various features of Tilgarsley Garden Village are noted – many of them good ideas – but there should be a commitment to investing in the Area Action Plan as soon as possible, if necessary using local WODC resources.

I am concerned that the idea of the Garden Village meeting Oxford's unmet need or an overspill community is actually a sham. It can only be, just an addition to the national pool of new houses, as there are no means by which developers could be forced to sell only to those who currently live or work in Oxford.

Para 9.40h: Matters of delivery and phasing are critical for me too. If unthought-through and carefully managed, this delivery, not only for the developing the Garden Village but also the western development could be fatal for Eynsham, given the current and ever increasing traffic congestion on the A40 and in the village centre at peak times. Moreover, the risk of gravel extraction forever looms large around Eynsham and, I understand, most recently on the land immediately east of the Garden Village, north of the A40.

I do not agree with a focussed Oxford Green Belt review for the purpose of building further houses close to the Garden Village. I do, however, support a wider review because I agree strongly with Professor Danny Dorling (see http://www.oxfordtoday.ox.ac.uk/features/how-solve-oxfords-growing-housing-crisis) that, on environmental and social grounds, Oxford’s unmet housing need should be provided near the city limits of Oxford. I understand that Oxford City will review their Local Plan and that WODC should input into this process to make sure that Oxford City bring forward all suitable options within their Green Belt or brownfield sites.

Para 9.5.40i: Regarding accelerating the lead-in time to construction, it is essential that infrastructure is built first, so that residents of the first phase of houses built have all the services they need when they move in. Eynsham’s infrastructure cannot cope with providing a transition period until full services are ready on the new sites. Developers often prefer to build houses first so they can re-coup their investment early by selling them before the infrastructure is built. This need not be the case. The Dorchester Living Group built and completed a 850-pupil school in Heyford Park before building a single house. If Eynsham is expected to provide an infrastructure transition period then, funding to provide temporary accommodation/provision, for example, extra consulting rooms at Eynsham Medical Centre, will have to be made. This of course would be a waste of money in the long run.

Para 9.5j: Genuinely affordable housing is essential and houses for long-term renting should be built to high standards too as so many people are likely never to be able to afford to buy their own home in the foreseeable future. Sheltered accommodation and a care home should also be built.

Para 9.5k-l: I have very mixed feelings about the Science Park for several reasons. The first relates to the point I make above about the Garden Village not necessarily being populated by researchers, academics and scientists from Oxford, they may be people who work in London, Witney, Oxford or anywhere else in West
Oxfordshire. Second, I am not sure that servicing the Science Park (e.g. cleaners, caterers) would be the reason people would go to live there (or could afford to live there). There are probably many residents of Eynsham who might offer those services, but it is likely that they would drive there, thus adding to air pollution and congestion! Third, I have seen no evidence that Oxford Brookes or University of Oxford need this Science Park – there are already a number in and around Oxford. Are the universities sponsoring the Science Park? Is OXLEP going to find funding for all of it? Who else is going to fund it? Especially in the light of Brexit, many researchers are going to find it difficult to be principle investigators on EU funded projects and already, some research projects are foundering due to our impending withdrawal from the European Union. Don’t forget too, that Eynsham has several business parks and the ones on the south are half empty and becoming derelect. I would hate to see a similar fate for the Science Park. Also, why not consider building a Science Park if it is supported on a brownfield site within the Southern Industrial Estates?

Para 9.5m-p: We all know that OCC plans for a Park & Ride and an east-bound bus lane into Oxford are entirely insufficient for improving the A40 problem we have now, let alone when there is the increased traffic from all the new developments in West Oxfordshire. WODC needs to work with OCC to develop a visionary plan for West Oxfordshire including a light electric railway that connects up Carterton, Witney, Woodstock, Eynsham and Oxford. Only then will any of the Local Plan really work and get people out of their cars. Hanborough station is inadequate at the moment as you know also know. The platform would need lengthening and a double track laid to enable more frequent trains. When that and bus connectivity as set out in 9.5.40p are done, then this might work.

Para 9.5.40q providing all the necessary facilities in the new village is good but Para 9.5.40r – good links between Eynsham and Tilgarsley (without the unnecessary and impractical ‘iconic bridge’) may be used by developers to back-pedal on building expensive infrastructure. Para 40q should be a binding principle, Para 40r is a nice benefit except that safe crossing must be provided for students attending Bartholomew School which should be listed in Policy EW1a.4.

Below is a shortened version of the Eynsham Society’s own response to the draft Plan, submitted separately.

The draft Plan has a disproportionate and potentially devastating effect on Eynsham, which has the misfortune to be immediately outside the Oxford Green Belt and hence faces unremitting pressure from developers. In consequence, it doubled in size between 1960 and 2001 and has been expanded further since then. The draft Plan provides for an additional 3,200 dwellings (including the supposed “Garden Village”, in practice an extension of Eynsham), which would more than double its size again, permanently affect its setting in the landscape and almost certainly destroy its cohesion as a community by changing it from a vibrant village to an under-resourced town without a commercial centre. It is notable (and unacceptable) that of these 3,200 houses only 450 (14%) would be to meet local housing need.

Eynsham accepts that it needs a proportionate amount of new housing, and volunteers in the Eynsham Futures Group have devoted much time and effort over the last two years to preparing a draft Neighbourhood Plan detailing how this could best be delivered. Options identified include a small development either to the west of the village (caution is needed here to prevent sprawl as there is no strong boundary) or north of the A40 in part of the...
area where the "Garden Village" is now proposed. By pre-empting the only suitable sites, the draft Plan renders all this work nugatory and destroys any pretence of "localism".

The "Garden Village" – to be inauspiciously named "Tilgarsley" after a village somewhere in the area which was wiped out by the Black Death - is presented as though it were a self-contained and bounded independent settlement, as required by the prospectus for Garden Villages at https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities. However, it is from the outset intended to accommodate Oxford overflow rather than local people, and would rely on oversubscribed secondary school places and medical facilities in Eynsham, so would certainly not be self-contained. It would be at best an Oxford dormitory and at worst a social housing ghetto.

CPRE considers that Oxford overspill is exaggerated and that with so many out-commuters from West Oxfordshire already, there is double counting. Also, with the current A40 issues, this District may not be suitable. It’s therefore debatable whether WODC should have to contribute 2,750 homes to Oxford's unmet need. So whilst Eynsham is the closest to Oxford and so perhaps the most obvious location, in our view the number of houses planned is too many. We are aware of City Farm in the area of the proposed Garden Village and would suggest at the very least that this area remains untouched in perpetuity and that protection is put in place.

Given that the "Garden Village" is proposed purely to provide part (2,200 of 2,750) of the Oxford overspill accommodation, the proposal in 9.5.40k to include a Science Park is irrational. If its employees are to be housed in the "Garden Village", they cannot be considered to be "Oxford overspill" (since they will neither live nor work in Oxford) and the settlement will not be fulfilling its specific purpose. If they are not, on the other hand, it will simply add to the already unsustainable levels of A40 traffic and make an intolerable situation even worse.

Main Modification 153 (MM153) of the West Oxfordshire Local Plan 2031 proposes the allocation of land to the north of the A40 near Eynsham for the creation of a new Garden Village. The allocation proposes to deliver - 'around 2,200 new homes by 2031'.

The newly identified strategy (through MM153) for the creation of a strategic area of growth to the north of the A40 near Eynsham is fully supported for the reasons set out within paragraphs 9.5.40d to 9.5.40r and policy EW1a of the Plan. This identification of a strategic area of growth within this location has the opportunity to provide long term housing and economic growth for West Oxfordshire, Oxford City, the Oxford City Deal area and wider Oxfordshire for the emerging Plan period and for many years beyond 2031.

It is considered that the strategy as proposed within the Local Plan could be more positive and ambitious by recognising and identifying the significant potential for long term growth to the north and west of Eynsham. Attached to these representations is a development concept that shows how the area to the north and west of Eynsham could grow into a series of interlinked and sustainable Garden Villages. Whilst each village would have its own identity utilising and building upon the principles of the Garden City movement the creation of these villages represents an opportunity to create a single sustainable community with the existing village of Eynsham as its focus.

The strategy as currently proposed within MM153 places too much emphasis on the creation of a Garden Village that appears to represent a separate settlement and community to that of the existing village of Eynsham. A strategic area of growth to the north of the A40 and to the west of the existing village should be
seen as one entity and one sustainable place. The existing village of Eynsham should be at the heart of the growth. The opportunity as presented through the attached Garden Villages concept can create a serious of cohesive and interlinked villages that evolve around the existing village.

Whilst the intentions of the identified strategy for long term growth in West Oxfordshire are fully supported, objection is raised to the inclusion within the Plan of an indicative site boundary (as shown on Figure 9.15a) for the creation of the Garden Village. Although the Plan makes it clear in paragraphs 9.5.40g that this is an 'indicative' area and should not be taken as 'definitive' at this point in time, it is considered that all references to a site boundary for the Garden Village proposal (whether indicative or not) should be removed from the Plan for the following reasons:

1) Within the identified indicative site boundary there is no formal collaborative agreement in place between landowners to bring this area forward for development. Without such an agreement in place there are significant concerns as to whether the land is available and deliverable;

2) At present there is no detailed evidence to demonstrate that the land identified within the indicative boundary is the most suitable to bring forward the type and quantum of development that is proposed. Land surrounding the indicative site boundary is no less constrained or suitable.

Paragraph 9.5.40e: While mention is made of "commercial development on the southern boundary along the A40", once again the existence of David Einig Contracting, right in the middle of the proposed Garden Village site, is completely ignored. Why?

"The site has no significant physical or policy constraints", you say. What about the flood risks, picked up in the 2016 SFRA, the high wildlife and habitat value of the site (of European importance for arable plants), and the listed buildings (ignored in the Local Plan)?

"It falls outside the Oxford Green Belt. "True, but only just, and a strong case could be made for extending the Green Belt westwards, or for extending the Cotswolds AONB eastwards. Eynsham parish is, after all, within the Wychwood Project Area. It is anomalous having this strip of land, valuable in itself, outside the protected areas.

Paragraph 9.5.40p: What is meant by "a southern access point from Lower Road" to Hanborough Station? Is this yet another new road? Will it go through Greenfield land to the north of the Garden Village?

Paragraph 9.5.40r: To say that the services and facilities in Eynsham and the Garden Village will play "a complementary rather than a competing role" is an unfounded assertion. You cannot at this stage say, or predict, which it will be.

I am writing following a meeting of the Eynsham Labour Party Branch.

The modifications in relation to the proposal for a garden village the other side of the A40 are unsound as this
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<td>LOCAL LEVEL</td>
<td>Eynsham Woodstock</td>
<td>Eleanor Chance</td>
<td>-</td>
<td>354</td>
<td>MAIN 153</td>
<td>would not constitute a free-standing settlement as per the eligibility criteria for garden villages as set out in the document &quot;Locally-led Garden Villages, Towns and Cities&quot; by the Department for Communities and Local Government of March 2016, on page 7. It would hence serve to convert the existing village of Eynsham into a town, and a town with a dangerous, congested highway running through the middle. It is said this is needed to meet the unmet housing need of Oxford, but existing sites within the Oxford ring road have not been exhausted, eg present park and ride sites, which will no longer be needed with current plans to locate these facilities outside the ringroad. Inhabitants of houses within the ringroad will not require to use the already overburdened routes into the city from W Oxfordshire. Moreover, building over the land north of the A40 from Eynsham is likely to cause flooding to the existing Eynsham village, and also to new homes built in the new garden village. Houses are needed for homeless and vulnerable people in Oxford and Eynsham, but it is unclear how such people will be able to afford homes typical of a village, ie with at least two bedrooms and a garden. How will adequate GP services be provided to all the new residents proposed, given that the NHS is currently closing GP surgeries in West Oxfordshire?</td>
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<td>MM163</td>
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<td>354</td>
<td>MAIN 153</td>
<td>9.5.40n This is totally the wrong site for a Park and Ride. It should be situated to the west, nearer Witney (for obvious reasons). The idea of a bus lane to Duke’s Cut would be laughable if it were not so pathetic. This would result in solid traffic jams from the Wolvercote roundabout back past Duke’s Cut. If a bus lane is put in it needs the bridge to be widened. 9.5.40r An ’Iconic bridge’ – no thank you. You are drawing a picture of a totally urban landscape. Surely a ‘Garden Village’ is supposed to be completely separate?</td>
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<td>MM3</td>
<td></td>
<td>richard andrews</td>
<td>Mr</td>
<td>56</td>
<td>MAIN 153</td>
<td>Comments made on behalf of Eynsham Parish Council. Para 9.5.40d and q; Comment: Unsound – poor wording may result in failure to deliver community infrastructure to support the new housing. As already noted, having two SDAs will result in poor co-ordination between two important large sites. An important aspect of the modern Garden Village concept is that it is a new community and should not share community facilities with existing settlements. While the ENP accepts that this will not be strictly adhered to in every particular – and there may be some mutual benefits if the planning is co-ordinated – it is important that the principle of separate facilities for the new settlement is firmly established in the Local Plan. This will ensure that the high level of developer funding necessary for a Garden Village is forthcoming from landowners and developers who will naturally push back against the cost of building so much new infrastructure if they can find a loop-hole through which to do so. The ENP has a Vision specific to the new settlement: ENV1-7 (that is - the full Vision for Eynsham Village) shall be shared by a new settlement which shall be built according to Garden Village principles as a new, separate, community. Neither settlement should be dependent on the other; any shared facilities shall be done for mutual benefit and without harm to either. [ENV 8]</td>
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We consider that the principles of building infrastructure in advance and duplicating all the facilities of Eynsham as far as is practical should be spelled out.

Para 9.5.40r: Comment: Unjustified, no consideration of alternatives

This paragraph appears to be supporting the idea of a bridge between the two communities. ENP 16.20-24 discusses the alternatives and necessity of ensuring safe crossing for school students in particular. It is assumed that 9.5.40r is discussing foot/cycle connection - this should be made clearer.

The first occurrence of the name Tilgarsley appears in the paragraph without any explanation. Up to this point the term Garden Village has been used.

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<td>NP</td>
<td>Mr Pearce</td>
<td>S84</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 153</td>
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<td>MM332</td>
<td>Ms Couch</td>
<td>Ms Couch</td>
<td>634</td>
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<td>9.5.40d Garden village and 9.5.40j ‘Achieving high quality, imaginative and sustainable design’ need to seize opportunity to be more ambitious in the spirit of the first garden cities zero carbon homes, innovative local renewable energy grid, car free living, live/work provision, community facilities; new ways of providing housing- self build and co-housing, real social housing not ‘affordable housing’. Also applies to West Eynsham SDA.</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 153</td>
<td>Not sound</td>
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<td>MM381</td>
<td>Eynsham Society</td>
<td>Jolyon Cox (Hon. Sec., Eynsham Society)</td>
<td>Dr</td>
<td>Cox</td>
<td>803</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 153</td>
<td>9.5.40k, new science park; is there a proven demand for this in this location? We have an underused and semi derelict industrial area to the south of Eynsham- why not transform this site as a campus style science park? 9.5.40x New western link road: I support this in principle as there is a severe problem of traffic rat-running through Eynsham’s narrow streets, but plans would need to guard against development of all the land accessible from it as this would destroy Eynsham’s connection with the countryside. Suggest Bartholomew sports field and field south of Chilbridge bridleway are protected for village recreation use and max 30mph limit on road, with crossings. This would be in accordance to Policy EH3 – Public Realm and Green infrastructure: ‘New development should not result in the loss of existing green infrastructure.’ There is so little green space in Eynsham, I am sure it is well below national standards. 9.5.41a landscape ‘this area is not overtly sensitive’ I disagree- land west of Eynsham is highly valued for informal recreation and wildlife; land north of Eynsham has visual and high ecological value.</td>
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<td>MM357</td>
<td>Willow Environmental</td>
<td>Deirdre Mc Donald</td>
<td>Mrs</td>
<td>Mc Donald</td>
<td>102</td>
<td>&gt; SECTION 9 This proposal does not take into account operational businesses with strategic importance to the County. The</td>
<td>9.5.40e The glib statement that the proposed “Garden Village” site “has no significant physical or policy constraints” conveniently ignores the reality that parts of it are an internationally-recognised habitat for rare species (City Farm farm has recently been designated a Site of European Importance for arable plants), and that the rising ground includes an elevated water meadow which shields Eynsham from flash flooding in the event of sustained heavy rainfall as in August 2007. A full environmental and hydrological assessment of the site is required. 9.5.40f: suitability is predicated on protecting all parts of the GB, absence of County strategy, veracity of SMHA targets, etc. 9.5.40j: support self build and balanced community of rented, shared equity, self build and market housing. Areas of single housing type (size, cost, layout, etc) should be avoided. 9.5.40k: support the principle of the science park, subject to the principled caveats above. 9.5.40m/n/o/p/q: supported in principle (see other comments above). 9.5.40r: a link is an important feature of integration but must not encourage local car traffic.</td>
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<td>MM374</td>
<td>Carillion Capita</td>
<td>Jeremy Flawn</td>
<td>Mr</td>
<td>Flawn</td>
<td>745</td>
<td>MAIN 154</td>
<td>OCC Property &amp; Facilities strongly supports the identification of land to the north of the A40 near Eynsham to deliver an exemplary Garden Village Strategic Development Area (2,200 homes) including a science park, park and ride and other comprehensive services and facilities as depicted on figure 9.15a.</td>
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| MM376          | Stagecoach in Oxfordshire/Stagecoach West | Nick Small, Stagecoach Bus | Dr | Small | 1014 | MAIN 155 POLICY EW1a West Oxfordshire Garden Village Strategic Development Area | For the reasons set out above POLICY EW1a (g) is not sufficiently evidenced as being either achievable, or relevant, to the sustainable development of the Garden Village; and key opportunities to protect and take advantage of the opportunities for sustainable transport, in line with NPPF paragraph 32, have not been clearly identified, ensuring that they will be taken up in due course by development proposals. EW1a (g) should be modified to read: "(g) the provision of other supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development, and incorporating a comprehensive network for pedestrians, cyclists and public transport with links to adjoining areas, including a particular emphasis on improving linkages to Hanborough Station directly from the site to the proposed Park and Ride for pedestrians, cyclists and local bus services serving the Garden Village site; and to Eynsham. and oneEnhancing Hanborough Station as a transport interchange will provide further opportunities for sustainable travel from the site."
<p>| MM445          | Thames Valley Police - Simon Dackombe | Deirdre Mc Donald | Mr | Dackombe | 1024 | MAIN 155 POLICY EW1a West Oxfordshire Garden Village Strategic Development Area | Policy EW1a - TVP request that reference is made for the need to deliver other on site infrastructure aside from those items set out in the policy, for example a community hall, open space etc. this should also make reference to the potential need for a police touchdown facility as part of the development. |
| MM49           | Willow Environmental Solutions | Deirdre Mc Donald | Mrs | McDonald | 103 | MAIN 155 POLICY EW1a West Oxfordshire Garden Village Strategic Development Area | This proposal does not take into account current operational businesses of strategic importance to the County. This proposal such protect such sites and businesses. It should aim to co-exist with such businesses and work together to create a more sustainable development. |
| MM451          | English Heritage        | Historic England | Mr | Small | 1087 | MAIN 155 POLICY EW1a West Oxfordshire Garden Village Strategic Development Area | Historic England makes no comment on the principle of the Garden Village proposal but proposed Policy EW1a should contain a requirement that City Farm, a complex of grade II listed buildings and structures on the site, should be retained and provided with an adequate buffer zone from intensive development that... |</p>
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<tr>
<td>MM456</td>
<td>Sport England</td>
<td>Raymond Cole</td>
<td>Mr</td>
<td>Cole</td>
<td>1115</td>
<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>Would otherwise result in a high level of harm to the significance of the complex (e.g. keeping the field around the complex and to the east free from development. This would accord with paragraphs 126 and 132 of the National Planning Policy Framework, which require local planning authorities to recognise (in their local plans) that heritage assets are an irreplaceable resource and to conserve them in a manner appropriate to their significance, and great weight to be given the conservation of heritage assets.</td>
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<td>MM467</td>
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<td>Dinah Harris</td>
<td>Miss</td>
<td>Harris</td>
<td>1168</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>Having studied the local proposed plan for West Oxfordshire I would like to make two points regarding what I would like the planners to take into consideration. The second area regards the proposed West Oxon Garden Village Eynsham. I have concerns regarding the section of this plan which is to the west side of Cuckoo Lane and bordering the A40 road. There is an existing bridleway which is marked on the western boundary of the development. This must be preserved and protected for the local riders. With so many extra vehicles in that area due to the huge local development I would also like to suggest that a pagasus crossing is put on the A40 so allowing the riders/cyclist/walkers to cross safely. One has just been installed at the A34 Chiltern area. which has been a great improvement for local riders who use a network of bridleways in that area. Horse riders are a minority countryside user such as walkers and cyclists and just a vulnerable when on the public road. And with more housing/business areas being built it is even more important to provide extra off road access so as to split horses from motorised vehicles. There are many horses/livery/yards/training centres in West Oxon so there is a huge need to provide more off road riding. To back up my reason for the above comments the facts are that on average in this country there is one road accident a day where vehicles are involved with a horse on the highway resulting in either the horse or rider or both being injured. During the last 5 year period that has resulted in 38 riders being killed, 181 horses destroyed and over 2075 road traffic incidents involving equines. These proposed developments are an excellent opportunity to build in more multi use tracks for the minority countryside users in Oxfordshire.</td>
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<td>MM472</td>
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<td>Ronald Jenkins</td>
<td>Mr</td>
<td>Jenkins</td>
<td>1173</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>The proposals for the garden village are a nonsense. When added to the other proposals for additional housing in West Oxfordshire there will be a huge volume of additional traffic on the A40 which cannot even cope with present levels. The provision of park and ride facilities (1000 spaces) will hardly cope with the additional demand let alone ameliorate current overcrowding of the road. There must be a more substantial plan than a park and ride with a bus lane to cope with the A40 issue otherwise it will be difficult to attract new business to the garden village and may also negatively affect existing business in both Eynsham and Witney. We are fiddling with tactical transport planning rather than creating a new vision for</td>
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the future of transport in West Oxfordshire. Once a grand vision is set out, it will be a lot easier to determine where additional housing should go. The current approach puts the (housing) cart before the (transport) horse.

Representation on behalf of Oxford Aggregates

This is a representation to the consultation on proposed changes to the draft Local Plan made on behalf of Oxford Aggregates. Oxford Aggregates is collaboration between Hanson UK and Smith and Sons (Bletchington) Ltd for the purpose of coordinating future sand and gravel extraction from land east of Eynsham.

Hanson and Smiths have extensive landholdings between Eynsham and Cassington. Together with third parties including the Blenheim Estate these lands have substantial proven reserves of sharp sand and gravel which have been nominated to Oxfordshire County Council for potential future mineral working.

The Oxfordshire Minerals and Waste Local Plan Core Strategy (August 2015) seeks to make provision for a steady and adequate supply of sharp sand and gravel to meet the built development needs of the county. The land in the Lower Evenlode Valley Between Eynsham and Yarnton is identified in the MWLP as a future strategic resource area where aggregate mineral extraction will take place.

The MWLP also seeks to safeguard important known resources of sharp sand and gravel to ensure that such resources are not needlessly sterilised; that they remain potentially available for future use and are considered in future development decisions.

The proposal for the West Oxfordshire Garden Village to the north of the A40 at Eynsham with significant new housing and associated development presents a possible future constraint on mineral working. This would be contrary to the safeguarding objectives of the MWLP.

Our industry is dependent on a thriving economy and welcomes new housing and built development but we can only work minerals where they occur and the needless sterilisation of finite resources should be avoided wherever possible.

The impact of the housing proposals on neighbouring mineral land must be acknowledged by WODe and considered in advance of detailed master planning of the garden village. Appropriate environmental buffers and advance tree planting to minimise future conflicts should be identified to ensure that the mineral resources are not compromised and remain potentially available for future use.

Should appropriate buffers and mitigation be planned in advance and both mineral working and the West Oxfordshire Garden Village proceed on a similar timescale, then there is a significant opportunity to achieve:

- a sustainably delivered (i.e. very local, minimising carbon emissions arising from delivery) supply of aggregates and concrete to the new development and
- a beneficial afteruse of the mineral extraction area with potential open space, wetlands and increased public access complementing the garden village and Eynsham.

Garden villages are required to be independent communities:
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<td>Crest Strategic Projects</td>
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<td>1582</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>“14. The garden village must be a new discrete settlement, and not an extension of an existing town or village. This does not exclude proposals where there are already a few existing homes.” (Locally-Led Garden Villages, Towns and Cities, by The Department for Communities and Local Government: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages__towns_and_cities.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages__towns_and_cities.pdf</a>) The proposed new development is very close to the northern edge of Eynsham, and it is not clear from this plan how it will be made into a separate discrete settlement, as opposed to a large suburb of Eynsham, which will have been turned by this development from a village into a town. Moreover, such an ‘Eynsham Town’ would be a settlement divided by a busy and dangerous road.</td>
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| MM721        | The Blenheim Palace Estate | Neilson | - | 1626 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 155 | Policy EW1a Tingersley Garden Village Blenheim Estates object to the absence of an appropriate and robust land allocation process in support of the proposed Garden Village. As a consequence, the allocation of the Garden Village appears unjustified and to some considerable degree, “rushed-through.” The site has only been considered as part of a high level, Oxfordshire Growth Board assessment of a small number of sites, the overall purpose of which WAS NOT the identification of the most appropriate location and site for a new Garden Village in West Oxfordshire District. There has not been a robust options assessment. There is no evidence to demonstrate that a thorough District-wide assessment took place and that the proposed site for a Garden Village has emerged through an open and transparent consultation process, allowing for the appropriate comparison of sites and for the kind of consultation appropriate to the proposed Local Plan allocation of land in the open countryside for thousands of houses. The allocation of a new Garden Village in the countryside for thousands of houses is a matter of District-wide, strategic significance. It is therefore crucial to be able to demonstrate that any such allocation is fully justified, further to a thorough site selection and assessment process, the whole of which should be supported by robust consultation. No such substantive evidence exists. Rather, the proposed allocation appears to have been chosen following a severely limited and largely closed process, the purpose of which, in any case, was not to select a Garden Village. There is an absence of thorough, tested evidence, including appropriate comparative evidence and sustainability assessment, to demonstrate that the chosen site is the optimal site in the District for a Garden Village – or for any form of major development - to contribute to Oxford's unmet need. The selection of any |
such site must emerge through an appropriate process. It is not something to be "pulled out of a hat" and squeezed into an inappropriately short time frame, simply to fit into the Local Plan timescale.

Blenheim Estates has no "in-principle" objection to the development of a new Garden Village in West Oxfordshire. This may end up being at Tingersley - however, it is essential that any such proposal is the end-result of a thorough, appropriate and robust assessment supported by consultation. This is simply not the case for "Tingersley."

The proposed allocation is supported by sparse, incomplete and largely untested information. The case for the allocation is, as a consequence, insufficient and unconvincing. It has not emerged through, or been tested by, any form of open and transparent consultation. There is a notable absence of appropriate option and comparison testing. There is a notable absence of consultation.

As set out, the Garden Village appears as a last-minute change to a much-delayed draft Local Plan. The Local Plan is an inappropriate vehicle for the unveiling of a proposal of strategic significance without robust justification.

The creation of a new settlement in the open countryside is a significant step and needs to be fully justified. Such an approach, for example, lacks the sustainability advantages of expanding an existing settlement, where infrastructure, services and facilities already exist. Consequently, the need and evidence for a Garden Village in the open countryside needs to be compelling. It needs to be demonstrated that it comprises a sustainable approach supported by a convincing audit trail, demonstrating a robust assessment and allocation process.

The case for Tingersley is not compelling. It has not emerged through a robust process. There is insufficient evidence to demonstrate that it comprises the most sustainable way for West Oxfordshire to meet Oxford’s unmet need, due to a lack of comparison, testing, consultation and sustainability appraisals.

If West Oxfordshire District Council wishes to pursue a Garden Village approach to meeting Oxford’s unmet need, then this should be done in the appropriate manner. However, West Oxfordshire District Council readily accepts that the consideration of options and sustainability have not been properly considered:

"The Council could choose to develop a different package of housing sites to meet the housing target. However, any significant changes, such as the inclusion of another sustainability appraisal, transport modelling and viability, before the suggested Local Plan main modifications could be published for consultation. This could lead to additional delays to the Local Plan and is therefore not recommended." (Paragraph 5.25, Note to Committee in support of changes to draft Local Plan).

Sustainable development underpins planning. Nowhere does national planning policy or advice suggest that sustainability can conveniently be ignored if there is a perceived need to rush proposals through.

Sustainability goes to the very heart of good planning. As the Tingersley site has not emerged through an appropriately robust process, there is an absence of evidence to demonstrate that it represents the most sustainable, deliverable solution to meeting Oxford’s unmet need. There is an absence of evidence to demonstrate that the proposal is readily deliverable. The constraints to the creation of a brand new settlement are considerable. In the absence of clear evidence to the contrary, there can be no certainty that the proposed allocation will actually meet its purpose of addressing Oxford's unmet need within a realistic and appropriate timescale.
It is suggested by West Oxfordshire District Council that "Other options in West Oxfordshire scored poorly through evaluation process" (3.32). However "Growth Board apportionment process" (5.24), which itself was not an exercise to identify a new Garden Village but something entirely different, only assessed three other locations in the whole District. West Oxfordshire District Council’s Report to Committee goes on to state that two strategic options were considered in the Eynsham-Woodstock area, but that one of these comprised a site mostly in Cherwell – it is hard to imagine how such a site could therefore have comprised one of the (very few) options "considered" to meet Oxford’s unmet need.

The consideration of a couple of sites as part of a Growth Board apportionment process and not, for example, a "Garden Village Assessment Process," does not comprise an appropriately robust District-wide assessment for the allocation of a new Garden Village.

It appears that the attempt to rush through the allocation of a site for a new Garden Village is partly in response to the previous delays to the Local Plan. This appears to have resulted in a proposal regardless of the need for appropriate appraisals, modelling and crucially – an open and transparent approach to the consideration of options via appropriate consultation.

Thus, whilst Blenheim Estates supports the decision to provide for at least 2750 dwellings to meet Oxford’s unmet need, this should not be done so on the currently proposed basis of allocating land at Tingersley for a new "Garden Village."

The severely limited assessment of sites supporting the Growth Board proposals comprises an inappropriate evidence base upon which to justify the proposed Garden Village allocation. The selection of a major new strategic site must follow a robust site assessment and consultation process. It must be supported by appropriate and rigorous testing. Only then can there be some kind of assurance that any proposed site represents an appropriate, sustainable and justified choice.

Given the absence of an appropriate evidence base, Blenheim Estates is concerned that the proposed Garden Village could, for example, compromise the appropriate sustainable growth of Eynsham. The scant information provided as part of the "Technical Evaluation Process" supporting the Garden Village allocation provides inappropriate justification. For example, it is a serious concern that the Garden Village, were it to come forward, could compromise the delivery of Eynsham West as a result of severe market conflict between the two sites, not least due to the need for hundreds of houses to be sold each year within one small housing market area.

There is no market evidence to support the inference that Eynsham could support unprecedented market sales for a sustained period of time. This is just one aspect of the uncertainty that exists in respect of the viability/delivery of the proposed Garden Village. Other areas of uncertainty include the provision of appropriate infrastructure and services, and appropriate phasing to ensure sustainable growth in respect of the delivery of affordable housing, education, public transport, highway improvements, safeguarding local character and maintaining the vitality and viability of Eynsham town centre.

It is suggested that the Garden Village would play a key role as a "transport and business hub." This is odd, given that the site proposed could only ever support a tremendous increase in motor vehicle travel, including car commuting to Oxford. Unlike Long Hanborough, three kilometres away, the site has no train station. Thus, rather than having regard to national planning policy and providing for more opportunities for people to walk and cycle to excellent rail provision at Hanborough, through for example, the continued sustainable growth of Long Hanborough, WODC is choosing to promote more motor vehicle movements by creating a road-based "transport and business hub" in the open countryside adjacent to the A44.
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<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>165</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>To seek to create a so-named motor-vehicle based “key transport hub role” in the open countryside whilst, at the same time, purposefully seeking to prevent sustainable development within walking and cycling distance of the District’s most important railway station, just one hour from Paddington, does not make any sense. Rather, it appears to represent poor planning and does not comprise sustainable development. Whilst, in general terms, the provision of park and ride in the District is to be welcomed, the reality is that building one alongside a new settlement in the open countryside will only, initially, partially relieve a current problem. In reality, the creation of 2,500 new homes, adding around another 10,000 new car journeys per day over and above those resulting from the western expansion of Eynsham, would massively add to the major congestion problems associated with the A40 and the surrounding network, regardless of a new Park and Ride.</td>
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<td>MM728</td>
<td>Abbey Developments and David Wilson Homes Southern</td>
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<td>1671</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>The sudden revelation that WODC has made an ‘expression of interest’ in a ‘Garden Village’ on the north side of Eynsham, very close to the A.40 has come as a big surprise to Eynsham residents, and the timing, just before Christmas, leaves no time for considered thought or fact-gathering. The fact that the Garden Village of 2,200+ homes is intended to serve Oxford City’s ‘unmet need’ for workers in Oxford is totally unreasonable for two main reasons: * Together with the 1000 houses proposed for ‘West Eynsham’, making 3,200 new houses in all, the present village of under 2,000 houses will be totally swamped and changed in nature from a self-contained Cotswold village to a dormitory suburb of Oxford. * In the words of the planners (section 9.5.34) there is already “severe traffic congestion on the A40 between Eynsham and Oxford at peak times and on other key routes including the A4095 and A44.” The inadequate plans to remedy this, as displayed in the recent A40/Park&amp;Ride exhibition will hardly solve the present problem, let alone cope with the deluge of extra commuters created by the building of an estimated 12,500 more houses in the West Oxfordshire part of the A40 catchment area. This imposition from ‘on high’ needs challenging, legally if necessary, if we are to retain the identity of our village and to avoid the worst commuter jams in Britain. Surely the solution is either to build more homes in Oxford, regardless of green belt, where workers can use minor roads for a shorter and quicker journey to work, or to bring the business to the villages eg to Eynsham’s south business park, with appropriate worker housing nearby, thereby abolishing commuting.</td>
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<td>Eynsham Garden Village and West Eynsham Strategic Development Area MAIN2 of the draft plan confirms that an Area Action Plan is proposed for Eynsham to address the issue of unmet housing need arising from Oxford City. Whilst not objecting to the principle of strategic development at Eynsham, concern is raised regarding the quantum of housing which is deliverable within the Plan period to 2031. This allocation is for 1,000 dwellings and estimated for delivery between 2018 and 2027 (Appendix 2 of the Local Plan). Within the Local Plan ‘Vision’ (MAIN 9), the ‘Vision’ for Eynsham Garden Village is that it will be “selfcontained”. We question whether this is either achievable or desirable given the SDA’s proximity to Eynsham (particularly when taking into account the proposed West Eynsham SDA) We question to what extent the proposed Garden Village of 2,200 homes can really achieve this. It is</td>
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unrealistic that with any development in such close proximity to an existing town (Eynsham) that there will not be some shared use of services and facilities and a desirability for these facilities to be shared.

The combined allocation of West Eynsham SDA and Eynsham Garden Village is 3,200 units within the plan period. In order to meet OANtherefore, there is a very significant requirement for both of these sites to deliver, in full, within the plan period. This does not provide any flexibility for delays within the build-out phase.

Policy EW1a, a) ‘Up to 2500 homes...’ would give flexibility to shift provision from West Eynsham to Tilgarsley to improve prospect of overall delivery of the required total homes. Scope of Area Action Plan should include both Eynsham sites – this is hinted at but isn’t clearly stated.

Should the Garden Village go ahead on the proposed site and with this number of homes, many of us in Eynsham would prefer that all of Oxford’s unmet need (2,750) and West Oxfordshire’s need of 450 homes are built in the Garden Village (which provides more infrastructure funding from the developers) and West Eynsham is left in reserve.

EW1a f) should be emphasised more as there is no existing infrastructure in this case.

The Garden Village is being presented as a separate village community with its own infrastructure. However, my personal view and that of many Eynsham residents is that a ‘structural landscape buffer’ or thin and landscaped strip as shown in the Expression of Interest is completely unacceptable. Rather, as villages are around the UK, it should be separated spatially, visually and socially by substantial countryside - at least two fields in depth and trees separation. It should be much more than a hedge with trees and a bit of landscaping. Such a separation will help the new village to develop its own identity, separate from Eynsham and its own community spirit. It will promote good relationships between the communities and both will enjoy a rural feel and village character. It will also retain something of our county’s wildlife heritage.

I am contacting you regarding the preliminary plans for the Eynsham Village Development by West Oxford District Council [WODC] which unfortunately incorporates the main base of operations for David Einig Contracting.

The proposed village development includes DEC’s recycling operation which has PERMANENT planning permission. It also includes DEC’s access road off the B449 which has been used as one of the main roads into the scheme, this is also the access to the adjacent field of City Farm.

DEC is not interested in selling. This site is keen to DEC’S company development. The site is ideally located to Oxford and the main road network which ensures that lorry movements from work around Oxford are kept to a minimum. This site has Permanent Planning Permission and is designated in the Oxfordshire’s County Councils Minerals & Waste Local plan as a site of strategic importance. DEC have invested a lot of money improving and purchasing new plant for the site, making it a cleaner, safer and more environmentally friendly operation.

There is however no reason why the New Wintles recycling site cannot coexist along with a carefully thought out development plan for both new housing and business premises with the introduction of appropriate buffer zones. As this will be the closest recycling yard to the proposal and as a local business, if development does takes place, DEC could potentially assist the project by moving waste from groundworks and by supplying the recycled aggregates across temporary site roads rather than using the highway which will provide an environmental bonus.

We would be happy to provide further information on the site to assist in the future design and build and
have provided the below information for this reason.

Site Information: The New Wintles Farm Recycling site benefits from permanent planning permission for a Recycling site which was granted on 22nd July 2010 (10/0066/P/CM). The Site is not in the Oxford Green Belt and the closest residential property is 240m to the east of the site. The site is not in an area at risk of flooding and it is not within any specific landscape designation. It is rare to find such a good location as this, with the appropriate separation of the site from sensitive receptors; good transport connections; close to the source of waste and point of use of the recycled materials; outside the Green Belt; and with no other landscape designation.

The Site is well screened, a non-sensitive location on land that has previously been developed. This site is not deemed an environmentally sensitive location, nor one with any statutory designation for the protection of flora or fauna. It is not a wetland, a coastal zone, a mountain or forest, nature reserve or park. It is not designated for wildlife or near any areas of dense population. It is not in an area in which the environmental quality standards laid down in Community legislation have already been exceeded and it is not located in proximity to any landscapes of historical, cultural or archaeological significance.

C&D waste recycling facilities require a large site that must not be too close to residential properties, commercial uses and other sensitive receptors, because of the potential that the activity has for causing disturbance. The general policy of restraint on development in Oxfordshire means that urban areas are intensively developed, and there are therefore few if any sites that are large enough, with the appropriate separation to sensitive land uses. This site is perfect for its use and with proper research should never have been included in your proposal.

The site has been nominated in the Oxfordshire Minerals and Waste Local Plan: Part 2 – Site Allocations Document and more importantly it has been identified by Oxfordshire County Council as a site for strategic waste facilities. This site makes a major contribution to aggregate recycling in the county, there is an overriding need for this site and it is of major importance as a recycling site for the future of the County.

Should WODC wish to pursue their current development plan, they would need to demonstrate that they could offer DEC an equal or better alternative site close by with full permanent planning permission which would be acceptable to OCC Mineral & Waste Authority, local residents and my investors. I suggest that the enormous cost of doing this would far exceed any development proceeds especially as much of the surrounding land has been subject to infill and the land still has a number of methane vents.

DEC currently employs 100 local people and many of these jobs would be put in jeopardy should we not be able to operate from this site.

Finally it should be noted that the land is still shown in your documents as belonging to McKenna Plant. This is incorrect and should be amended to David Einig Plant Ltd.

If you have any further questions, requirements for information or concerns, please do not hesitate to contact us.

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<td>MM69</td>
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<td>Mugglewitch</td>
<td>Mrs Sensicall</td>
<td>188</td>
<td>&gt; SECTION 9 &gt; STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock</td>
<td>Any new village should not be in West Oxfordshire. Why not nearer Oxford.</td>
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<td>MM61</td>
<td></td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>Sub Area &gt; MAIN 155</td>
<td>A second primary school has suddenly appeared. Is it one (9.5.40q) or two (EW1a (f))?</td>
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<td>MM752</td>
<td>Bloombridge</td>
<td>Bloombridge</td>
<td>Mr</td>
<td>Cutler</td>
<td>Sub Area &gt; MAIN 155</td>
<td>Policy EW1a (MM155) should be amended to reflect the provision of 1,440 homes during the plan period to 2031, with a recognition that the remainder of the 2,200 homes will be delivered beyond 2031 to reflect concerns regarding the lead in time and delivery rate of new homes. This change is required to ensure that the plan is deliverable and effective.</td>
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<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>Sub Area &gt; MAIN 155</td>
<td>Policy EW1a (MM155) should be amended to reflect the provision of 1,440 homes during the plan period to 2031, with a recognition that the remainder of the 2,200 homes will be delivered beyond 2031 to reflect concerns regarding the lead in time and delivery rate of new homes. This change is required to ensure that the plan is deliverable and effective.</td>
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<td>MM75</td>
<td>AJ04</td>
<td>Mr</td>
<td>Bickley</td>
<td>Sub Area &gt; MAIN 155</td>
<td>The proposals for a Garden Village are dependent on funding from central Government. This is in no way certain, and there are no alternate proposals outlined if the funding is not forthcoming. In addition, we are not given any details of what the AAP will contain, and timescales for its delivery. Therefore I believe this proposal is unsound.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>Garden Village north of A40 at Eynsham</td>
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The eastern part of site, adjacent to Lower Road (the Eynsham – Hanborough road) is partly underlain by deposits of sharp sand and gravel, some of which has previously been worked. These mineral deposits lie within the ‘Thames, Lower Windrush and Lower Evenlode Valleys from Standlake to Yarnton’ strategic resource area for sharp sand and gravel which is included as a principal location for aggregate minerals extraction in policy M3 of the submitted Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy 2015. In due course, specific sites for mineral working are to be identified within the strategic resource areas listed in policy M3 for allocation in Part 2 of the Plan, the Site Allocations Document.

Under policy M8 of the submitted Core Strategy, the strategic resource areas listed in policy M3 are included within mineral safeguarding areas, within which mineral resources are safeguarded for possible future use. In respect of this, policy M8 states:"Development that would prevent or otherwise hinder the possible future working of the mineral will not be
permitted unless it can be shown that:

- The site has been allocated for development in an adopted local plan or neighbourhood plan; or
- The need for the development outweighs the economic and sustainability considerations relating to the mineral resource; or
- The mineral will be extracted prior to the development taking place."

Policy M8 in the submitted Core Strategy reflects saved policy SD10 in the adopted Oxfordshire Minerals and Waste Local Plan 1996. Mineral safeguarding areas were not identified at that time but policy M8 states:

‘Mineral resources will be conserved for the benefit of future generations. Development which would sterilise or make the extraction of a mineral significantly more difficult will not be permitted unless it can be shown that the need for the development outweighs the economic and sustainability considerations relating to the mineral resource.’

In relation to preparation of the new Oxfordshire Minerals and Waste Local Plan, a large area of land, including parcels on both sides of Lower Road, has been nominated to the County Council by the landowners for consideration as a potential site for allocation in the Plan for sand and gravel extraction. A plan showing this site nomination (no. SG-08) is attached to this letter.

Policy on safeguarding of mineral resources covers not just those mineral deposits that would be directly sterilised by development within a proposed development site but also any adjoining or adjacent mineral deposits which the development concerned would effectively prevent or prejudice by virtue of the need for unworked ‘buffer’ distances between any future mineral working and sensitive development such as housing and schools to ensure adequate mitigation from adverse effects on amenity or other important environmental interests.

There is a permitted and operational waste recycling facility at New Wintles Farm that is included within the site. A plan showing the area of the permitted site is attached. This is a strategic level facility of importance for recycling of construction, demolition and excavation waste and for the production of recycled aggregate for use in place of land-won primary mineral. This facility is listed in Appendix 2 of the submitted Oxfordshire Minerals and Waste Local Plan: Part 1 - Core Strategy 2015 as a site that is safeguarded for future waste management use by Policy W11 of the Plan. In respect of safeguarded sites, policy W11 states:

‘Proposals for development that would prevent or prejudice the use of a site safeguarded for waste management will not be permitted unless: 4

- the development is in accordance with a site allocation for development in an adopted local plan or neighbourhood plan; or
- equivalent waste management capacity can be appropriately and sustainably provided elsewhere; or
- it can be demonstrated that the site is no longer required for waste management.’

There is no available evidence to show that the safeguarding of mineral resources or of the New Wintles Farm waste management facility have been properly taken into consideration in the proposed West Oxfordshire Garden Village, on land north of the A40 at Eynsham. Therefore the County Council objects to this proposal.
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<td></td>
<td>graham</td>
<td>m</td>
<td>griffiths</td>
<td>219</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>on the grounds that it is contrary to existing and emerging policy for safeguarding of mineral resources and of waste management facilities. The County Council welcomes further discussion of this issue. There are references to the Garden Village being 'self-contained'. When planning strategic infrastructure such as secondary school provision to support growth in the Eynsham area it will be important to take a comprehensive approach to assessing the impacts of growth and planning necessary capacity improvements. The wording should be changed to: 'Up to 2500 homes..' this would give flexibility to shift provision from West Eynsham to Tilgarsley to improve prospect of overall delivery of the required total homes.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2197</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>Ecology and Natural Environment In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species. The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary. West Oxfordshire Garden Village City Farm to the north-east has been identified by Plantlife as a (non-statutory) site of European importance for rare arable plants. There are Local Wildlife Sites identified nearby. City Farm and the adjoining areas are also of particular importance for farmland birds, supported by the strong network of field boundary hedgerows. Increased recreational pressure arising from the proposed development would be likely to have an impact beyond what might be expected from the basic footprint of the development and should be considered in assessing site impacts. The Woodland Trusts Eynsham Community Wood lies on the southern edge of the area and will require additional resources to ensure it remains resilient in the face of increased recreational pressure. There are areas of best and most valuable agricultural land in the south, to the west of the park and ride site.</td>
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<td>MM75</td>
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<td>AJ04</td>
<td>Mr</td>
<td>Bickley</td>
<td>221</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>Policy EW1a (following 9.5.40r) EW1a j] - I’d like an explanation on how removing natural environments and replacing with them with houses, roads, P&amp;R and a science park enhances biodiversity.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2260</td>
<td>&gt; SECTION 9 - STRATEGY</td>
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<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>e) provision of a new park and ride site (1,000 spaces) with associated eastbound bus priority lane along the A40. Suggest removing 'eastbound' as the eventual aim is for bus lanes in both directions. We have secured provisional funding for eastbound but want to retain the opportunity to seek funding from this development for the westbound bus lanes as in line with LTP4.</td>
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<td>- Policy EW1a (following 9.5.40r)</td>
<td>g) the provision of other supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development, and incorporating a comprehensive network for pedestrians, cyclists and public transport with links to adjoining areas, including a particular emphasis on improving linkages to Hanborough Station and to Eynsham and on enhancing Hanborough Station as a transport interchange. We suggest the following changes to ensure this policy is in line with LTP4. Suggested text to replace point 'g)': provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development: the provision of appropriate financial contributions towards LTP4 transport schemes such as the A40 Strategy; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians, and cyclists with links to adjoining areas, including the park and ride, Eynsham village and Hanborough Station. Provision of individual Travel Plan (and associated Travel Information Packs) for the residential and employment areas, as well as the school. The County Council has experienced significant difficulties in securing appropriate mitigation measures for the impact of strategic development areas where portions of the site have come forward as separate planning applications. To help reduce the occurrence of this issue we propose this additional text: The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.</td>
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<td>MM91</td>
<td>HeilliR</td>
<td>Mrs Rhodes</td>
<td>235</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>I do not believe Policy EW1a allows the delivery of sustainable development in accordance with the policies in the NPPF, particularly paragraph 7: ‘Achieving Sustainable Development - a social role’. The lives of the residents of Eynsham and of the new Garden Village will inevitably become entwined (e.g. the contributions to secondary school capacity suggest that children from the Garden Village will attend Bartholomew School, resulting in social contact with children and families from Eynsham). In fact, it is most likely that, over time and as both developments grow, they will come to be seen as one settlement. And yet this settlement will be divided by an extremely busy road posing a potential hazard for those trying to cross it (young people are, notoriously, risk-takers), and a danger to all residents from air pollution. As a result this new Garden Village cannot be described as ‘a high quality built environment, with accessible local services’.</td>
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<td>MM98</td>
<td>Paul Luna</td>
<td>Professor Luna</td>
<td>259</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>The Eynsham Neighbourhood Plan (05 / 16.19–24) lays out more clearly the necessity for separation of the Garden Village from Eynsham that this policy as currently expressed; it also recommends (Recommendations A and B) that adequate land is protected from development for any future improvement of the A40 to protect Eynsham residents from noise/safe access between the villages (e.g. re-alignment north of the current line).</td>
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<td>MM129</td>
<td>Andrew Mosson</td>
<td>Mr Mosson</td>
<td>304</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>I fully support the proposal for a new Garden Village North of Eynsham but think it is vital that the new village is as far spaced from the existing Eynsham settlement as possible. The draft local plan shows the development area as staring immediately north of the existing A40 with the road being the only separation. This is not acceptable as, in effect, it will not be a separate development but only an extension of Eynsham</td>
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| MM19          | Labour Party            | Eynsham Labour Branch | Ms               | Dawson            | 360       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 155 | Comments on Local Plan by Eynsham Labour Party Branch at meeting held on 21st November 2016:  

While it was agreed that more housing was necessary, this must be affordable by local families who really need them, who have been priced out of the local market. A number of very serious questions were raised regarding the new Local Plan for West Oxfordshire:

* According to the document produced by the Department of Communities and Local Government on Garden Villages [1][#_ftn1] , the second Eligibility Criteria (page 7) is that "the garden village must be a new discrete settlement, and not an extension of an existing town or village". This is clearly not the case with the proposed garden village on the northern side of the A40. The size of this and its immediate proximity to existing Eynsham, and the fact it is still within the Eynsham parish boundaries, would make Eynsham into a town the size of Witney. Moreover, it would be a town with an extremely dangerous road running through the middle of it, which would be an accident waiting to happen. Children accessing educational facilities not available in their half of the new town, mothers in a hurry to access shops, pub goers etc may all feel the need to skip using the bridge planned. So the question arises – why here? It is understood that places in West Oxfordshire actually want development.

* 50% of the housing is to be affordable and 20% social housing, which we welcome in principle. However, what does "affordable" mean? We think it should mean that a family on a salary of a maximum £20,000 can afford to buy or rent. In principle, self-build sounds interesting, but how would this be organized to make it a viable option for those with few savings? Buying to let should also be controlled. Quality standards should also include sound proofing, as many families, especially those with young children, suffer from neighbour disputes over stress caused by sound travelling in badly built housing.

* Infrastructure and congestion is a concern, and if this "village" were to go ahead, all roads and services required should be in place before any housing is inhabited.

* Access to green areas and footpaths is of great importance to existing Eynsham inhabitants and must be maintained.

* What is the idea of the "science park"? What does "B class High Tech" mean? Is the park for research, or is this just another term for an industrial park? Are there not other industrial parks in the area which still have spare capacity? If it is for research, which part of Oxford University is interested in this, and will they still have the funds for it after Brexit and the loss of EU funding for research?

* On the development to the West of Eynsham, the current frequent floods around the Chilbrook make building houses there unwise. These occur without prior warning and can be devastating to householders.

[1][#_ftnref1] March 2016, Locally-led Garden Villages, Towns and Cities, Department of Communities and Local Government |

| MM246         | Judith Luna             | -               | Luna             | 453               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock | Policy EW1a  
The proposed Garden Village is elsewhere referred to in the Plan as 'free-standing' and 'self-contained'. It is therefore essential that effective infrastructure is put in place to support the housing at the same time. If this is not done the Garden Village will be reliant on Eynsham for its facilities, including schooling, GP practice, and retail and other amenities. The Eynsham GP practice and schools are either at, or close to, capacity, and there |
Sub Area > MAIN 155

will be a detrimental impact to Eynsham inhabitants if adequate provision is not made in timely fashion. Any increase in traffic on roads within Eynsham will lead to gridlock, delayed bus journeys, and increased pollution and worsening air quality. I am also concerned about the increased flood risk from concreting a large area to the north of the A40 and to the west of Eynsham, especially from flash floods once run-off areas have been lost.

> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 155

The 'new village'

It is a horrific thought that the most unspoilt, diverse natural area should be chosen for the new village - that said I will continue.

What a ridiculous thought that building a new village just on the other side of the A40 would mean it would be separate.

Would the development build a new School, Shops, Surgery before any houses? The answer to that was a big no so all the occupants of the first development would naturally come to Eynsham for schools, doctors, and provisions. It is a lovely welcoming village and they would continue to feel part of it.

Why can't the new village go further north, leaving some fields all round so that that village could also be in better surroundings and not pressed against the A40? Thus giving it a separate identity.

I intend to go to the consultation about the A40 to see whether any notice was taken from the last consultation.

I live in Eynsham and I have been looking at the proposals to increase the size of the village by building north of the A40. If you have ever tried to get a doctors appointment at Eynsham you would know that unless a new health centre is built first, the health care of Eynsham residence will be like a third world country. Build the infrastructure and facilities first before a single new house is occupied. The local hospitals are pushed to breaking point and with an ageing population the whole system is on the verge of a meltdown. I know this for a fact as my wife works in the NHS and I have had cause to require its services recently. It's not free, we pay a lot for it but it is unable to cope. This problem is real and will not go away. It must be addressed before any new houses are built.

The proposal to locate a Garden Village north of Eynsham does not comply with the concept of a Garden Village for the following reasons: the site is not freestanding; public transport links rely on the congested A40 and the full to capacity Hanborough Station; it will be a dormitory for Oxford commuters, as it cannot be assumed that future residents will work in the proposed science park; it will have severe environmental and landscape impacts on an unprotected area.

The location of development in this location also contradicts existing policies, e.g OS2, in that it will result in the loss of open space that makes an important contribution to the character of the area. The proposed location is within an important green corridor linking the west of Oxford with the Cotswolds.

The changes to the LP make no allowance for non-delivery of any particular site. There is no reserve provision that we can see within district, sub-area or even within the SDA/AAP areas at Eynsham.

(This is a duplication of comment on table 9.4 included for completeness) The Eynsham Neighbourhood Plan (ENP) accepts the figure of 3200 new homes within the Parish but which it considers would be better constructed within the new Garden Village north of the A40. There are strong indications that a new

Comments made on behalf of Eynsham Parish Council

EW1a: Comment: Unsound – may prejudice delivery of enough homes up to 2031

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[This is a duplication of comment on table 9.4 included for completeness] The Eynsham Neighbourhood Plan (ENP) accepts the figure of 3200 new homes within the Parish but which it considers would be better constructed within the new Garden Village north of the A40. There are strong indications that a new
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| MM321         |                        | Robert Crocker  | Mr Crocker       | 590               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 155 | settlement of 2200 houses will struggle to fund the necessary infrastructure, especially on land which has been put forward for housing with the consequent high expectation for the land value that will be realised. Building more houses, sooner, is the best way to minimise the risk of inadequate infrastructure provision. The numbers should be amended to reflect the need for reserve provision.
EW1a f) and h): Comment: Unsound – principles are not clearly stated; may prejudice delivery of supporting infrastructure rendering new homes unsustainable.
Reasons as specified for 9.40d – the provision of adequate infrastructure to ensure a ‘free standing’ settlement should be included in the wording of the policy.
Para f) appears to be a ‘stock’ phrase that needs strengthening in the special circumstances of creating a new community.
EW1a g): Comment: Unsound – lacks justification or proper consideration of alternatives.
The general thrust of the paragraph is to be supported but the choice of Hanborough Station as a ‘transport interchange’ given that the village is losing its ‘rural service centre’ function is odd. While good links to the railway station are encouraged in the ENP as a benefit to Eynsham and Tilgarlesly, the station is not an ideal location for any form of interchange. Instead, the new Park and Ride at Eynsham should be promoted as the primary interchange in the sub-region, ideally served by buses going to the hospital and employment sites of east Oxford in addition to those already going to the city centre. This hub will serve residents of Eynsham and Tilgarley and some buses should go through each settlement to encourage maximum local usage; it will also serve Witney, Carterton and the rest of the District with the option of arriving by car or bus at the interchange. A bus service to and from Hanborough should connect with both station and village to present a wide range of public transport options to as many people as possible district-wide. Provision of a cycle path to link Eynsham, Tilgarley and Hanborough Station is a valuable bonus.
The proposed Garden Village will adversely affect my farm. The land has been for Wildlife first for many years and serves as a crucial offset to the intensive agriculture that surrounds. The whole area is a wildlife haven, the loss of any part will have immeasurable consequences. I ask you please to read the following.
Objections to building north of the A40...Garden Village etc.
* Loss of rich, ecological site. The habitat is unique to this area. Removing any part will unbalance the whole. It has taken decades to create this wildlife haven.
* Flooding. Development north of the A40 will affect the hydrology of this highly, balanced area.
* Coalescence of Eynsham / Freeland / Hanborough. Building to the north of the A40 will inevitably lead to urban sprawl and the indicative site for Tilgarley (Black Death) Garden Village is too close to Eynsham. Move it northwards and it is too close to Freeland.
* Traffic congestion. The location chosen by WODC (by default) is already too congested without a realistic hope of remedy. The suggested location leaves no room for traffic management and lasting alterations.
* The topography is unsuitable for large scale development. The land rises up over Acre Hill and the buildings would be visible from Oxford. WODC maintain the ‘Garden Village’ is not site specific...if so, consider building the Garden Village in a better location. i.e. Middle Leigh (Barnard Gate)
* Oxford City is surrounded by a horse shoe of urban sprawl. From Abingdon to Radley, Kennington, Cowley, Headington, Barton and back to Kidlington. The only rural Green corridor left is the one into West Oxfordshire leading on to the Cotswolds...Area of Outstanding Natural Beauty. This corridor must be protected...don't devalue our rural heritage.
* Proposed park and Ride is in the wrong place. It should be built adjacent to the existing A40 Eynsham roundabout, allowing traffic from the Hanboroughs, Standlake and Eynsham easier access, there is adequate room to make the roundabout 3 lanes.  

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<td>MM5</td>
<td>holist.co.uk</td>
<td>Mr Mowbray</td>
<td>6</td>
<td>&gt; SECTION 9</td>
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<td>&gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>The growth of Witney and West Oxfordshire will only happen sustainably by the creation of a parkway rail station off the A40 and the Local Plan should make the express commitment to this. If the garden village proposition has any potential, it should promote an A40 rail link.</td>
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| MM328         | Russ Canning            | Mr Canning     | 605              | > SECTION 9       |           | > Eynsham Woodstock Sub Area > MAIN 155 | Not Sound  
The proposal to locate a “Garden Village” adjacent to the village of Eynsham is fundamentally flawed on the following 8 counts:  

1. The areas of search for a suitable site were highly selective and, in particular did not address the land to the south of the A40 at Barnard Gate brought forward by the Eynsham Hall Estate. The Barnard Gate South site displays fundamental characteristics which make it significantly more suited to accommodating a “Garden Village” than Eynsham North, including:  

- A featureless, flat topography as opposed to the gentle undulations of the rising ground to the north of the A40 which links the Thames Valley to the south with the Cotswolds immediately to the north.  
- A mature network of tree belts which were planted 40 years ago as game cover but which would now envelope new development minimizing its landscape impact and visual intrusion.  
- A sterile, intensively farmed, ecology as opposed to the highly sensitive and valuable habitats at City Farm, the currently proposed site of the “Garden Village”.  
- A “Garden Village” south of the A40 near Barnard Gate would be genuinely freestanding and would not pose the threat of coalescence and loss of landscape setting to Eynsham, Freeland and Church Hanborough villages.  
- The site’s proximity to the route of the former Witney Branch Line provides the opportunity for a truly sustainable transport link into the employment centres of Oxford, Witney and Carterton.  
- Being within a single ownership, the Barnard Gate South site is deliverable within the Plan Period.  

2. The selection of Eynsham North has been hurriedly made with no reference to Freeland or Church Hanborough Parish Councils. There have been no parish council briefings or public meetings for residents of either Freeland or Church Handborough and as a result there is little awareness amongst local people of the devastating impact the proposed “Garden Village” will have upon their quality of life. The sole basis of the site’s selection being expediency, with no strategic, long term, joined up vision. This vision would see a genuinely free standing “Garden Village” at Lower Barnard Gate, linked to a Science and Technology employment zone at Carterton to the west and Oxford city to the east, initially by bus service but ultimately by light rail or tram based upon the Witney branch line route.  

3. Eynsham North is too close to Oxford city and would form a suburban dormitory, rather than an...
4. Eynsham North would not be a freestanding community but grafted onto the village of Eynsham. The residents of Eynsham have worked hard to produce their Neighborhood Plan which has been effectively shelved by WODC in adding a further 2,200 homes to the 1,000 identified by the Neighborhood Plan on flat land to the west of the village.

5. Eynsham North would effectively lead to the coalescence of the settlements of Eynsham, Freeland and Long Hanborough, contrary to policy and good spatial planning principles.

6. Eynsham North would impact severely upon the landscape settings of Eynsham, Freeland and Church Hanborough. The Sustainability Appraisal of alternative sites confirmed that construction of a Garden Village in this location would result in Severe, Long Term, Landscape and Visual impacts. [Oxford Sustainable Options Assessment, LUC, September 2016.]

7. Eynsham North would be divorced from the service centre of Eynsham village by a major highway with all its associated noise, vibration, air pollution and safety issues, contrary to all good planning practice.

8. A “Garden Village” in this location would be divorced from the long term vision of reopening the Witney Branch Line to the south of the A40 as a light rail or tram service which would also link Carterton to Oxford. This being a truly “sustainable” transport solution, as opposed to a further Park & Ride, which will simply generate intensified local traffic movements as commuters access the facility.

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<td>MM332</td>
<td>Ms Couch</td>
<td>Ms Couch</td>
<td>635</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>Policy EW1a Garden village</td>
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<td>Confusion over whether this is a separate or linked development- my understanding is that it should be self contained- then why is it so close to Eynsham and 2 rural service centres so close to each other? Suggest if it goes ahead, this development should take all of Eynsham’s share of Oxford’s unmet need, rather than splitting it between 2 Eynsham sites and/or spreading the provision more widely. It should be distinctly separate, and it should not take services away from Eynsham (doctors, shops, secondary school, library etc). Also there is some confusion between providing Oxford’s housing and providing new employment- it is of course desirable to live near work, but what confidence is there that this will be achieved? Most will probably struggle to get into Oxford along an increasingly congested A40.</td>
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<td>MM34</td>
<td>graham</td>
<td>MR Lay</td>
<td>72</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>Whilst I appreciate the need for additional housing in the Oxfordshire region I find the proposal for the Garden Village to the North of Eynsham to be totally wrong and perverse in a number of ways. This development would dramatically change the whole nature of this rural area and seriously affect the quality of the lives of those who live in the villages. Such developments are absolutely fine in the appropriate areas but not when imposed between small rural villages. Many roads in the West Oxon area are overloaded causing much misery to those who have no option but to use them. Without first implementing drastic improvements any further developments which will increase the traffic should not be entertained. Dualling the A40 between Witney and the Wolvercote roundabout and providing a direct connection to the A34 from the A40 would greatly improve traffic flow. Small local improvements such as park and rides, tram links and dedicated bus routes will help but they will not help those who are travelling through the region and there are many who are obliged to do so.</td>
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<td>MM374</td>
<td>Carillion Capita</td>
<td>Jeremy Flawn</td>
<td>746</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>OCC Property &amp; Facilities strongly supports the identification of land to the north of the A40 near Eynsham to deliver an exemplar Garden Village Strategic Development Area (2,200 homes) including a science park, park and ride and other comprehensive services and facilities as described in policy EW1a. This site will play a significant role in helping to meet Oxford’s unmet housing need and OCC P&amp;F is keen to work with the District</td>
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1. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Bike Safe.

2. Bike Safe are a registered charity which was set up to promote an off-road multipurpose path for cyclists and pedestrians along the B4044 between Eynsham and Botley/Oxford, via Farmoor. The path crosses the boundary between the Vale of White Horse and West Oxfordshire districts.

3. Bike Safe have prepared technical design work for the path received in principle support for the proposed community path from Vale of White Horse planning officers and Oxfordshire County Council through a pre-application planning request (Ref 15/V1482/PEM).

4. Bike Safe and the B4044 Community Path project are also explicitly referenced in the submitted draft West Oxfordshire Local Plan 2031 which states that:

   9.5.49 Active travel will be positively encouraged to capitalise on the proximity of this sub-area to Oxford City. Existing pedestrian and cycle routes will be safeguarded and opportunities for new and enhanced routes will be identified. Where appropriate, we will seek walking and cycling schemes from new development either directly or through a financial contribution. Initial work has been instigated by a local group called ‘bikesafe’ looking at the potential to introduce a dedicated cycle route along the B4044 Eynsham Road. The Council will work with the group and other relevant partners including the County Council to further consider the merits and possibility of this scheme being taken forward.

5. The draft West Oxfordshire Local Plan recognises the potential of the B4044 community path to facilitate active and sustainable travel to Oxford City. The commitment to work with the group is welcomed.

6. Bike Safe however object to Policy EW1a West Oxfordshire Garden Village SDA (Main Modification 155) and Policy EW1b West Eynsham SDA (Main Modification 158) due to the lack of reference to contributions from these developments towards the provision of the B4044 Community Path.

7. Both of these allocations are substantial and will generate significant traffic from the new housing and to the proposed new business park.

8. The B4044, although a ‘B-road’, is a well-used commuter route between Oxford, Science Vale and West Oxfordshire.

9. The B4044 community path will connect and provide a safe route for around 15,000 people living in the three parishes along the route- Eynsham, Cumnor and North Hinksey. It will also provide an attractive and sustainable commuter route for cyclists between the Eynsham and West Oxford growth areas.

10. The B4044 road surface is poor in places and there is no provision for pedestrians and cyclists along this road. The verge is full of hidden holes and un-safe to walk on. The road is a key route which carries up to 12,000 vehicles per day with speeds up to 50mph. The carriageway is too narrow for two vehicles and a bicycle to pass safely. The road winds along its route which limits opportunities for vehicles to safely overtake walkers or cyclists. This frustrates drivers and stops most cyclists and pedestrians from using it. It is just too
11. The community path will have a number of key benefits:

- i. Much more attractive for commuters to cycle with reduced congestion and CO2 emissions;
- ii. Improved and sustainable connections for existing communities to access facilities at Farmoor, Botley, The Hill End Centre and Oakenholt Care Home;
- iii. Health benefits of walking and cycling and improved connectivity and social inclusion;
- iv. Safer road conditions for cars and buses;
- v. Improved countryside access including to the Thames Path.

12. The route has widespread public support. It also has the support of the Parish Councils through which it passes and key businesses such as Stagecoach and Siemens. Initial discussions have been held with the major landowners who have indicated their support.

13. As a charity Bike Safe has raised significant funds from the public through sponsored rides and runs and from grant giving bodies. This has enabled environmental surveys to be undertaken and the commissioning of the technical design by engineers InfrastructCS. The environmental surveys and the technical path design has been made available to the Council and can be made available to the Local Plan Inspector on request.

14. Based on this technical design the cost of providing the path will be significant and is estimated at £2.9m.

15. Bike Safe propose to continue to raise funds to contribute towards the planning and build costs and is unique in Oxfordshire in helping to raise this local contribution.

16. The delivery of the path however will require additional funding. Given the location of the proposed SDAs at Eynsham, the additional traffic generated on the B4044 will make conditions worse for pedestrians and cyclists.

17. Bike Safe consider is necessary that these SDAs should make financial contributions towards the implementation of B4044 Path to achieve the suggested focus on sustainable travel and to mitigate their traffic impact.

18. This is in accordance with paragraph 9.5.49 of the plan as quoted above. Bike Safe consider, however, that the wording of Policies EW1a and EW1b should include a specific reference to the B4044 path.

Freeland Councillors feel that there has been a complete lack of consultation about the Garden Village. The first they heard about it was in an email from WODC in mid-August this year advising them of an initial "Expression of Interest" about the site. Yet barely a couple of months further on, the Draft Local Plan has been updated to state that the Garden Village "will be built," yet there has been no formal consultation with local parishes at all. This is totally unacceptable and therefore it should not be included in the Draft Local Plan as a definite, otherwise it is pointless feeding back comments to WODC when this is already a "fait accompli".

Whilst Councillors recognise the need for development to provide housing where it is needed, they do not feel that the Eynsham Garden Village is in the correct location. They do, however, wish to support the Eynsham Parish Council Neighbourhood Plan, in which they support the development of the area to the West of Eynsham that will provide up to 1,000 houses.

Freeland Councillors absolutely object to the Garden Village development going ahead in the proposed location and will not be offering their support to this proposal. It would effectively lead to the coalescence of
Eynsham and Freeland/Church Hanborough villages contrary to policy. The proposed alternative Garden Village location recently put forward south of the A40 in the vicinity of Barnard Gate is a more sustainable alternative.

They feel the development is far too large for the proposed location, the local infrastructure is insufficient to cope with the huge number of cars that will be generated from such a site and the proposed Park and Ride facility would also be far too small to cope - or to take a significant number of cars off the A40. They believe the whole site, which will generate in excess of an additional 4,000 cars, will just exacerbate the nightmare that is the daily congestion already experienced on the local road network between the A4095 and the A40.

To state in the Plan that “there will be a strong emphasis on the provision of high quality local employment opportunities in order to encourage increased self-containment and reduce the need for out-commuting” is simply making a huge assumption that a large proportion of the Garden Village residents will work at the new science park, thus reducing the amount of traffic generated by the site. This is purely speculative and cannot be relied upon as evidence, leaving the unanswered question of how will the additional traffic be compensated for?

No doctor’s surgery has been provided in the plans, and both local surgeries are already operating at full capacity with no room to take on the number of additional patients that would be generated from a development of this size.

West Oxfordshire is predominantly rural, which residents choose to live in because of the attraction of the rural villages. As the updated (June 2014) SHLAA states, “although Freeland does not include a conservation area, the surrounding geography and landscape impose significant constraints upon further expansion of the village…..This gently rolling vale landscape creates an important rural outlook from the road, with views of the nearby service centre being hidden by the gradual rise in the adjacent fields.”

In addition Policy CO2 of the Local Plan states that a key Objective is to “Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.” A Development of this scale and in the proposed location will significantly compromise the quality of life of residents of Freeland, Church Hanborough and Eynsham and is clearly in contradiction to this policy.

As you will note from the above one of the key themes running through the assessment is that the area is visually sensitive and any development would be highly prominent and exposed which would be very detrimental to the approach to Freeland village from the A40. The complete erosion and destruction of the rural approach to Freeland village is a major concern for the Councillors, plus they feel the Garden Village will also change the whole character of Eynsham village for the worse and they do not believe the Garden Village will be self-sufficient based on the evidence they have read so far.

The area included within the proposed Garden Village is mainly farmland and to have this completely destroyed and replaced with Science Parks, Park and Ride facilities and a huge amount of housing, is just totally unacceptable. The Updated Draft Local Plan proposes up to 2,200 homes initially but goes on to state that there is the possibility of significantly more and Councillors are very concerned that because this proposed site already abuts the Freeland Parish boundary, it will eventually spread beyond the boundary right into Freeland, thus having a
major detrimental impact on the rural approach to our village. This is contrary to Policy EH1 of the Local Plan which seeks to conserve and enhance the quality, character and intrinsic distinctiveness of the landscape setting.

Policy CO14 is to "Conserve and enhance the high quality of West Oxfordshire with protection and promotion of its diverse landscape, biodiversity and geological interests..." The area included in the Garden Village is one of the most species-rich areas for wildlife in Oxfordshire, with vast numbers of species of flora and fauna being found in the area, which feed out into the wider surrounding countryside. It has been designated as a Local Wildlife Site since 1977 and has been surveyed regularly since then. Grassland plants of national conservation concern which are found at City Farm include Field Scabious, Ragged-Robin, Tormentil and Devil's-bit Scabious, which are all on the Red List for England. The area of City Farm has also been designated a Site of European Importance for arable plants.

4.52 Capacity: The West Oxfordshire Garden Village SDA is a new allocation in the Proposed Modifications of 2,200 homes. Whilst the capacity of the site has not been justified, and the vision within the Expression of Interest (EOI) simply identifying broad residential areas, we do not take issue with these capacity figures.

4.53 It was expected that the Government would make an announcement in the autumn on whether they will support West Oxfordshire’s garden village concept through their garden village programme. The Council suggest that should Government financial support is made available then the delivery of this new strategic development area could be accelerated. If the EOI is not successful, its delivery may be slower. At the time of writing it is unknown whether the Government support the West Oxfordshire Garden Village SDA.

4.54 The Council’s trajectory assumes the slower rate of delivery, without Government financial support, but still expects first completion by 2021-22, four years from now. The EOI identifies ways of speeding up the delivery of the Garden Village so that the necessary 2,200 homes are completed by the end of the plan period.

4.55 Ownerships: There is a total of 19 different landowners within the SDA, requiring residual land assembly.

4.56 Delivery: It is still unknown whether the site would be brought forward by a promotion partnership, development partnership or full joint public/private venture and as yet there are no identified developers on board. Thus, the Council’s expected start in 2020-21 is considered to be highly optimistic and there is no justification for the 220 dpa build out rate.

4.57 The Council anticipate that the use of incentives to developers to increase their build-out rates such as financial support and waivers on planning conditions which are conditional are required to achieve these build-out rates. However, the precise mechanism for this is yet to be established and in our view only adds to the complexity in bringing the site forward. Indeed, developers will not commence until this matter has been trashed out.

4.58 Exactly how the site is to be phased is also still to be decided and depends on the as yet unprepared Garden Village Infrastructure Delivery Plan which will identify key infrastructure and infrastructure dependencies mapping.

4.59 Infrastructure: The following infrastructure is required and will be delivered in whole, or in part, through CIL or developer funding: A40 duelling improvements, and western bus lane; enhanced access and parking to Hanborough Station; walking/cycle connections across the A40 to Eynsham, including a new landmark footpath.
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<tr>
<td>MM417</td>
<td>Education Funding Agency</td>
<td>Samantha Powell</td>
<td>Ms Powell</td>
<td>926</td>
<td>/cycle bridge and the widening of Lower Road and Cuckoo Lane.</td>
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4.60 Conclusions: Without any justification for the Council’s build out rates we have applied a build out rate of 161 dpa to the delivery of this SDA. We also consider the commencement of development by 2021 is highly unlikely. Bearing in mind the site has only recently been formally identified in the Local Plan and the fact that a range of services will need to be delivered alongside the proposals, it is our view that NLP’s average lead in time (3.9 years) for an application and average period between submission of an application to first commencement (6.1 years) is entirely justified in the case of this particular scheme.

4.61 This would result in development starting in 2026/27. However, in order to be robust we have commenced the site at 2024/25, resulting in 1,127 homes being built within the plan period.

| MM424         | Natural England          | Marc Turner     | Mr Turner        | 941        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 155 | The approach given to the identification of individual allocations (as set out under the relevant sub-areas within chapter 9) and their associated policies is strongly supported. |

Where relevant, individual policies require the provision of schools as part of the wider allocated development, including the number and size of schools required (for example Main Modifications 103, 140 and 155). Where the proposed housing numbers do not trigger the need for a new school, the policy requires appropriate provision of or a contribution to the necessary supporting infrastructure (for example Main Modifications 128 and 131). This approach is supported by the EFA.

You will have no doubt taken account of the key strategic policies to reiterate this position, including securing developer contributions through s106 and CIL, but it would be helpful if they were explicitly referenced within the document. In particular, as below:

The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).

The EFA support the principle of safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. Support is also given for the siting of schools within the allocated sites in locations which promote sustainable travel modes for pupils, staff and visitors. There is also a need to ensure that the education contributions made by developers through the Community Infrastructure Levy are sufficient to cover the increase in demand for school places that is likely to be generated by a development. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.

West Oxfordshire District Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on ‘Planning for Schools Development’ (2011) which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system.

Overall, the EFA commends the main modifications proposed. They seek to ensure that adequate future education provision across the district is provided.

| MM424         | Natural England          | Marc Turner     | Mr Turner        | 941        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 155 | The impact of these new allocations on traffic levels on the A34 and potential consequential air pollution impacts on the Oxford Meadows SAC needs to be addressed. |

West Eynsham SDA and West Oxfordshire Garden Village SDA
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<tr>
<td>MM49</td>
<td>Willow Environmental Solutions</td>
<td>Deirdre Mc Donald</td>
<td>Mrs</td>
<td>Mc Donald</td>
<td>99</td>
<td>Woodstock Sub Area &gt; MAIN 155</td>
<td>It is understood that an Area Action Plan is to be developed for the Garden Village and we recommend that use of Natural England's Discretionary Advice Service (DAS) is considered to help develop a high quality Green infrastructure for the new settlement. Through early engagement with Natural England customers will receive high-level customer service to support an efficient planning application process and achieve development which is more sustainable. For more information please see <a href="https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals">https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals</a></td>
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<td>MM450</td>
<td>Railfuture</td>
<td>Andrew McCallum</td>
<td>Mr</td>
<td>McCallum</td>
<td>1050</td>
<td>Main number 156:</td>
<td>My concern regards the Eynsham Village Development which incorporated my clients main base for operations which is a recycling site with permanent planning permission. It also includes the access road to my clients site.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 155</td>
<td>This site is of strategic importance not just to my client but is identified as such in the Oxfordshire Minerals Plan. The site is ideally located just outside Oxford, the main creator of waste in the County. It is located on a Highway Truck Road with good access and I believe its existence has been overlooked for this entire project.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>Surely it would make more sense to incorporate this site into the design with appropriate buffer zones. Then this site could assist in the whole project, moving waste from the groundworks and by supplying the recycled aggregates across temporary internal site roads rather than using the highway.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>It should be noted that this site is perfect for its use and with proper research should have never been included in this proposal. The site makes a major contribution to aggregate recycling in the County, there is an overriding need for this site and this site is of major importance as a recycling site for the future of the County.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>My client currently employed over 100 local people and many of these would be out at jeopardy should we not be able to operate this site.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>Should WODC wish to pursue the current proposal, they would need to demonstrate that they could provide my client with an equal or better site with full planning permission, located close to Oxford with good road network and access which would be acceptable to the Oxfordshire Minerals and Waste Planning Authority. I suggest that this would be extremely difficult and costly.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>Finally I would like to add that the surrounding land is subject to infill and the land has still a number of methane vents - I don't think this was taken into account also.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>Main number 156:</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>The old line crosses the southern tip of the West Eynsham site and the proposed western link road. It is important to ensure that the link road does not block railway reopening and at the same time this area would be a prime location for a railway station served by the link road, giving direct access for the residents of the 1000 new houses.</td>
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<td>Insert at the end of EW1b (c):</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>The site will be future-proofed for the longer-term re-opening of the Yarnton Junction - Witney railway line, with a link road connecting to a potential station at the southern end of the site.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>Insert 9.5.40xx after 9.5.40x:</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>In order to future proof the local transport network, the line of the old Witney-Yarnton Junction railway will be safeguarded from development. The proposed western link road will be provided with either an over- or</td>
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<tr>
<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs</td>
<td>Kent</td>
<td>1184</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>We badly need a western bypass (plus cyclepath) to ease the entrance from the A40 of increased traffic to the Eynsham West development (EW1b), and to ease existing and increasing choking of central Eynsham. We suggest Bartholomew sports field and the field south of Chilbridge bridleway are protected for village recreation use, with max 30mph limit on bypass, with crossings. See Policy EH3 ‘New development should not result in the loss of existing green infrastructure.’</td>
</tr>
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</table>
| MM491        | Crest Strategic Projects | Crest Strategic Projects | - | Crest Strategic Projects | 1584       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 156 | Main 156: Paragraphs 9.5.40s–9.5.41b
9.22 There is no evidential basis for allocating part of the proposed West Eynsham SDA as an SDA to help meet the housing needs of West Oxfordshire. Such an approach is not in accordance with the chosen spatial strategy that underpins the Local Plan. The unmet housing needs of Oxford that are assigned to West Oxfordshire could potentially be dealt with in full at the single proposed Garden Village location, north of the A40. As a contingency measure land to the West of Eynsham, identified by the LUC study, on which the Council appears to rely, could then be identified as a reserve/contingency site to be released if a prescribed monitoring exercise reveals that the Garden Village is delayed.
9.23 The terms of reference of the LUC report are clear: the role of the potential location was considered and tested as a candidate to help meet the unmet housing needs of Oxford. The proposed amendment set out within the GL Hearn representations would be consistent with the evidence base and would support flexible and proactive plan-making.
9.24 Paragraph 9.5.41a highlights the inconsistencies that are apparent within much of the decision-making that the Council has undertaken in compiling the modifications version of the Local Plan. The impact on landscape is identified as a key consideration in determining which sites to allocate to deliver the proposed spatial strategy. SA criterion 14 addresses the objective of conserving and enhancing landscape character and the historic environment. The proposed modification advises that compared to alternative site options the proposed West Eynsham SDA is preferable in these terms. Comparison of the site with alternative site options considered via the SA exercise demonstrates71 that this is not the case: The West Eynsham SDA (1,000 dwellings) scored the same as the West Carterton (1,000 dwellings) and North Carterton (1,200 dwellings) SDA options in the 2016 SA Addendum. While this is important in itself, what is more notable is the fact that both options at Carterton would be in accordance with the proposed spatial strategy selected for meeting the housing needs of West Oxfordshire and therefore allocation of either or both of these options in preference to land to the west of Eynsham would be aligned with the evidence base.
9.25 A further factor militating against the land at Eynsham is the acknowledged multiplicity of land owners who would need to be corralled into cooperation to ensure that a comprehensive and deliverable scheme could be delivered. In contrast the land West of Carterton is controlled by a single house builder (Crest Nicholson) with an enviable and long-standing track record of delivering successful, high quality strategic-scale developments. |
<p>| MM726        | JA Pye Oxford Ltd       | JA Pye Oxford Ltd | - | JA Pye Oxford Ltd | 1648       | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; | The identification of a Strategic Development Area (SDA) to the west of Eynsham for 1,000 houses is supported. JA Pye Oxford Ltd owns land at Fruitlands (see attached Location Plan) and through the sensitive and sustainable development of this site for limited residential development there is a significant opportunity to create pedestrian and cycle links from the existing village through and beyond Fruitlands to the larger development opportunity beyond. The creation of these sustainable links will allow integration of the West Eynsham SDA with the existing village. |</p>
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| MM733        |                          | Angie Titchen   | Dr               | Titchen           | 1699       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 156 | Para 9.5.40v: In the Eynsham Neighbourhood Plan we suggest that the Oxford unmet need (550 houses) should be added to the WO Garden Village and the rest of the land to the west left in reserve. However, if there is to be development of the Western Eynsham SDA, then our Neighbourhood plan proposes that building should only take place north of the Chilbrook, so that rare wildlife south of the Chilbrook is protected. In addition, this would retain the rural walks, running and cycle rides that so many of us in Eynsham need for our health and well-being as well as the lovely views of Eynsham’s conservation area over the fields, when approaching from Twelve Acre Farm and the Nunney. I support the detailed landscape and visual impact assessment outlined in 9.5.41a.
9.5.40z: Please also consider a cycle path to the Toll Bridge that will join up with a cycle/community path to Botley when it is eventually built. |
| MM751        | Goldfield Estates        | Goldfield Estates | -                | -                | 1862       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 156 | MAIN 156 Paras 9.5.40s-9.5.41b sets out the proposals to allocate land to the west of Eynsham for development and notes the considerable developer interest in this area to date. This amendment notes the suitability of the area for development and allocation and states that this has been demonstrated through the Council’s Strategic Housing and Employment Land Availability Assessment (SHELAA) and as part of the Local Plan Sustainability Appraisal (SA) process alongside other reasonable alternatives. We support this change and consider that this consideration has followed the correct procedure and is legally compliant, positively prepared and sound. |
| MM751        | Goldfield Estates        | Goldfield Estates | -                | -                | 1885       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 156 | MAIN 60 Paras 7.23-7.28 notes the current traffic issue along the A40 and notes that improvement in capacity may be achieved and that the current junction at Eynsham is a contributory factor. We would suggest that the new junction to the proposed Park & Ride facility to the north of Eynsham should also be utilised to provide access to the allocation to the west of Eynsham to avoid creating more than one new access to the A40 principal route, to maximise accessibility to the Park & Ride site and to manage the way that new development traffic accesses the main road network to ensure that this does not contribute to any further issues to the capacity of the network. We appreciate the views of the community expressed in the Autumn 2015 consultation 'Investing in the A40' and we recognise the need to future proof A40 access design proposals to accommodate a future possible westbound bus lane and possible future dual carriageway along this section of the A40. We understand that there will be ‘funding gap’ issues associated with the delivery of new strategic infrastructure and we will work with the Highway and Planning Authorities to identify necessary measures to mitigate the impact of development traffic and where appropriate contributions to strategic transport improvements that would be of wider benefit to the local community.
Amendments to Paras 7.27-7.27b provide a summary of the improvements proposed along the A40, including the Park & Ride facility and note that the council have been considering funding options for this these. MAIN 65 Para 7.54 also notes the proposed Park & Ride facility at Eynsham will be delivered in conjunction with improvements to the A40. MAIN 156 Paras 9.5.40x-9.5.40y explains the benefit to the community of providing the West Eynsham SDA link road to give additional journey choice and to remove unnecessary through traffic.
These paragraphs also note that appropriate consideration will need to be given to the connection to the A40 and to the Garden Village to the north. We assert the land to the west of Eynsham could provide necessary funding contributions to deliver an appropriate standard of link road and to provide and enhanced junction to the A40, which would support the delivery of the infrastructure required for the Park & Ride facility, particularly for non-car modes of travel from the wider Eynsham village. Development of the Site in the short term can respond to the identified housing need and also enable the early delivery of essential infrastructure for the West Eynsham SDA, co-ordinated and closely designed with the evolving work on the 2017 planning application by Oxfordshire County Council for the Park & Ride site. |
The pre-submission version of the Neighbourhood Plan for Eynsham is currently out for consultation until the 31st of January 2017. The emerging Neighbourhood plan seeks to accommodate the proposed growth set out in the Local Plan, including the proposed modifications. Of importance Proposed Policy ENP17 covers the western expansion area, point A) of the policy states: “Development west of Eynsham shall have vehicular access from the A40 at only one point”. The supportive explains that the single access point will be achieved through the consolidation of junctions. The Site Options Assessment which supports the pre-submission version of the Neighbourhood Plan sets out preferred details of how this access can be achieved. Maps W1, W2 and N1 all show one consolidated access point to the north of the Site. An extract of Map W1 is below (see original representation).

Gavin Barwell’s written ministerial statement on 12th December 2016 gives further support and weight to the Neighbourhood Planning process. We consider it is vital that the access aspirations for the western expansion area, as set out in the emerging Neighbourhood Plan accord with the emerging Local Plan. We request that the Local Plan be amended to reflect this and further exploration of the issue be considered in the hearings to ensure that the Plan is robust and effective in this delivery on this point.

Paragraph 9.5.40x: Which SHELAA are we talking about here? Has the 2016 SHELAA, announced in March, been published? I could not find it.

In the West Oxfordshire Strategic Housing Land Availability Assessment (SHELAA) of just two-and-a-half years ago (June 2014), the land north of the A40 now proposed for the Garden Village was classified as “Not Suitable” for development. The document said: “Noise impact and unacceptable impact of development on open countryside.” Why have you ignored your own advice, and how come it is now OK to have precisely this impact on open countryside?

As mentioned before, in a comment on paragraph 7.43c, this new western link road for Eynsham will slow down traffic on the A40, at the junction, and the bypass to the east already removes through-traffic from the centre of Eynsham.

A key consideration for this site is traffic impact not only in terms of the traffic impact of the proposed development but also the potential to deliver strategic transport improvements that would be of wider benefit to other residents and employees. In particular, a major urban extension such as this presents the opportunity to provide a new western link road for Eynsham serving the new development and also providing a strategic road connection from the A40 to the B4449 to the south, thereby providing additional journey choice and also helping to remove unnecessary through-traffic.

The West of Eynsham SDA will need to be served by a spine road to distribute trips arising from the development onto the surrounding road network.
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<tr>
<td>MM98</td>
<td></td>
<td>Paul Luna</td>
<td>Professor</td>
<td>Luna</td>
<td>256</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>The West of Eynsham site is only ‘well-related to the main services and facilities of Eynsham’ by virtue of proximity to them, as this document does not quantify the additional load on current health and secondary education provision in the village. While this and the following paragraphs do commit to transport, flooding mitigation, and sewerage infrastructure, it is less clear or silent about the demand on existing health care or secondary education provision.</td>
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<td>MM98</td>
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<td>Paul Luna</td>
<td>Professor</td>
<td>Luna</td>
<td>257</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>(40t) The two developments mentioned in this paragraph were objected to all all levels within the village and district. Some mitigation may be had for the detrimental effect of the site off Thornbury Road (in terms of traffic exiting to Witney Road opposite Bartholomew School entrance) if there is a clear requirement that any development in the adjoining site allows traffic to access this site from the West (with due provision to avoid rat-running).</td>
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<td>MM163</td>
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<td>Eleanor Chance</td>
<td>-</td>
<td>Chance</td>
<td>355</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>9.5.40x A western bypass for Eynsham is desperately needed. The medieval streets of central Eynsham are constantly choked with traffic. Planning permission has already been given for over 200 houses to the west of the village with absolutely no way to travel east except through these narrow streets.</td>
</tr>
<tr>
<td>MM163</td>
<td></td>
<td>Eleanor Chance</td>
<td>-</td>
<td>Chance</td>
<td>409</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>9.5.40s Development to the west of Eynsham. None should be allowed until a western bypass is built – infrastructure before housing. Witney road/A40 junction needs to be altered to allow traffic to turn right, at present all east-bound traffic has to come through the narrow, medieval streets of the village. 9.5.40x and y - Western link road – yes please.</td>
</tr>
<tr>
<td>MM246</td>
<td></td>
<td>Judith Luna</td>
<td>-</td>
<td>Luna</td>
<td>454</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>9.5 40x  The site to the west of Eynsham is only ‘well-related to the main services and facilities of Eynsham’ via existing narrow and congested local roads. It is not clear how the existing facilities (schools and GP practice), already at capacity, are expected to cope with the increased demand.</td>
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<td>9.5 40t  These two developments will have a detrimental impact on Eynsham even before the proposed large-scale plan for 1000 houses is implemented. Traffic from both sites will access the A40 and the village via Witney Road, which at the start and close of the school day will be severely congested. Already at these times there can be tailbacks to Chilbridge Road in one direction and the Bartholomew School layby in the other, as buses on both carriageways pick up students, and the resulting pollution from exhaust fumes is growing.</td>
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<tr>
<td>MM61</td>
<td></td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>585</td>
<td>MAIN, Policy EW1a</td>
<td>A second primary school has suddenly appeared. Is it one (9.5.40q) or two (f)?</td>
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<td>9.5.40t</td>
<td>Not sound</td>
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<td>Could the 77 homes at the Garden Centre and the 160 homes west of Willow Edge count towards the 1,000 new homes for west of Eynsham?</td>
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<td>9.5.40u</td>
<td>Not sound</td>
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<td>Which SHELAA are we talking about here? Has the 2016 SHELAA, announced in March, been published? I could not find it.</td>
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<td>9.5.40v</td>
<td>Not sound</td>
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<td>In the West Oxfordshire Strategic Housing Land Availability Assessment (SHELAA) of just 2½ years ago (June 2014), the land north of the A40 now proposed for the Garden Village was classified as “Not Suitable” for development. The document said: “Noise impact and unacceptable impact of development on open countryside.” Why have you ignored your own advice, and how come it is now OK to have precisely this impact on open countryside?</td>
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<td></td>
<td>9.5.40x</td>
<td>Not sound</td>
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<td>As mentioned before, in a comment on Para 7.43c, this new western link road for Eynsham will slow down traffic on the A40, at the junction; and the bypass to the east already removes through-traffic from the centre of Eynsham.</td>
</tr>
<tr>
<td>MM3</td>
<td>richard andrews</td>
<td>Mr</td>
<td>Andrews</td>
<td></td>
<td>61</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 156</td>
<td>Comments made on behalf of Eynsham Parish Council.</td>
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<td>9.5.40s</td>
<td>9.5.40s: Comment: Unsound – lack of consideration of alternatives may result in non-delivery of the total of 3200 homes in the Eynsham area. Level of housing proposed for the west has not been adequately assessed or justified by testing of alternatives.</td>
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<td>9.5.40t</td>
<td>The changes to the LP make no allowance for non-delivery of any particular site. There is no reserve provision within the SDA/AAP areas at Eynsham.</td>
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<td></td>
<td>9.5.40u</td>
<td>A total of 1000 new homes cannot be supported by the proposed sites without building at urban density up</td>
</tr>
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9.5.40x and y: Comment: Unsound – the need for a Link Road to provide access has not been objectively considered in relation to the harm it will cause to local amenity and of alternative, less intrusive, road access.

Both statements indicate that a Link Road is to be constructed as part of the western development as a clearly prejudged matter. Not only is the nature of the road undefined but there is no allowance in the statements for considering alternative access that may be necessary to ensure viability (hence deliverability) or the trade-off between harms and benefits that different road options would incur.

Recognition of the common needs of the two developments either side of the A40 is positive and should be seen as a justification for a single SDA covering the whole area. The real problem of road access is not within the development area but immediately outside it on the A40 and at the Toll bridge. These issues are only mentioned in passing, presumably because developers cannot be forced to improve pre-existing problems, although they might prefer to see their contribution towards road transport used to provide real benefits for their potential purchasers or tenants rather than providing link roads of dubious value.

9.5.41a: Comment: Unsound – assumptions may prove wrong and jeopardise delivery of house numbers.

The reference to the Neighbourhood Plan in 9.5.40v is meaningless if the results of the work and consultation are ignored. The ENP agrees that the northern part of the site is suitable for housing for the reasons given, but it is equally clear that the southern section is far less suitable and certainly does not come into the ‘easily mitigated’ category. The ENP recommends that the southern part of the site be used as open-access green space incorporating the SUDS features necessary for this flood-zone affected site. The reference to ‘alternative site options’ is misleading as there are no alternative sites offered – a general weakness within the Local Plan.

9.5.41b: Comment: Unsound – the numbers are a serious over-estimate of what can be delivered.

The Neighbourhood Plan recognises that part of the site can deliver significant numbers of new homes at the appropriate time. However, overestimating what can be achieved puts the overall housing delivery at risk or sub-standard and inappropriate development will result - neither harm will result if numbers are kept reasonable. The high number suggested originates from a proposal put forward by Berkeley Strategic Homes that does not take into account the on-site design and mitigation issues mentioned in 9.5.41a; there is no
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<td>MM357</td>
<td></td>
<td>Tony Bovey</td>
<td>Mr Bovey</td>
<td>821</td>
<td>&gt; SECTION 9</td>
<td>9.5.40s: the western SDA is too far from the central area facilities and new residents are likely to drive through the village to the central facilities. The Chilbridge Road is a well used recreational and amenity route and should not become a public vehicular route. Land adjoining should designed as public amenity land.</td>
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<tr>
<td>MM45</td>
<td></td>
<td>Nigel Rose</td>
<td>Mr Rose</td>
<td>94</td>
<td>&gt; SECTION 9</td>
<td>Although mention is made of suggested, currently unfunded, improvements to the A40 between Witney and Eynsham, it has to be recognised that the route will still be subject to the congestion problems nearer to Oxford. Also because of the problems created by any perturbations, the only reliable long term solution will be to re-open the old railway line between Yarnton Junction and Witney. A re-opening of the Witney line will provide direct rail access to the economic growth areas in Oxfordshire and beyond and to Heathrow Airport. To this end the line of the old railway should be safeguarded from development along with any necessary deviations around developments that have occurred since the railway was closed. The old line crosses the southern tip of the West Eynsham site and the proposed western link road. It is important to ensure that the link road does not block railway reopening and at the same time this area would be a prime location for a railway station served by the link road, giving direct access for the residents of the 1000 new houses.</td>
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<tr>
<td>MM98</td>
<td></td>
<td>Paul Luna</td>
<td>Professor Luna</td>
<td>253</td>
<td>&gt; SECTION 9</td>
<td>The plan of the SDA includes Bartholomew School Playing Fields within its boundary. Given that any development affecting playing field land will be objected to (e.g. by Sport England), and that playing field space adjacent to the school is limited resulting in an excellent case for the retention of these playing fields, this is an inappropriate inclusion.</td>
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<td>MM98</td>
<td></td>
<td>Paul Luna</td>
<td>Professor Luna</td>
<td>258</td>
<td>&gt; SECTION 9</td>
<td>The detailed work undertaken by Eynsham Futures in the Neighbourhood Plan offers the most considered proposals so far on e.g. the siting of a new primary school, the maintenance of views of the village from the West, and the alignment of the Link Road.</td>
</tr>
<tr>
<td>MM325</td>
<td></td>
<td>Posy Parrinder</td>
<td>Mrs Parrinder</td>
<td>595</td>
<td>&gt; SECTION 9</td>
<td>Comments on the SHELAA Report 2016 part of the draft West Oxfordshire Local Plan 2031 [WOLP31] We wish to comment on the inclusion of the whole of site 210 at Eynsham on the sites map at page 43 of the report. The site outlines include land that we own south of 1 to 8 Abbey Farm Barns being a field of 0.6 of a hectare. I attach a map showing the land outlined in red. We strongly object to our land being put forward as a possible site for development. It is most certainly not</td>
</tr>
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</table>
available and was not put forward for inclusion in the SHELAA by us or anyone else with the legal right to do so.

We have asked for this to be corrected on 2 other occasions. Would you please remove our section of land from the SHELAA map and other documents before we seek legal advice.

**Main 158 Policy EW1b**

West of Eynsham Strategic Development Area

Stagecoach is aware that two sites within the scope of the draft allocation are already the subject of positive determinations, totalling together just under 240 dwellings.

Stagecoach notes and strongly supports paragraph 9.4.40z, that points out the need for the best possible pedestrian and cycle links to the east, to allow residents to take advantage of service provided in Eynsham. This includes existing high-frequency bus services to Witney and Oxford, operating as service S1, up to every 10 minutes at peak times.

Stagecoach wishes to make clear to the Council and the Enquiry that:

* It intends to maintain a high quality bus service from Eynsham via Swinford Toll Bridge and Botley to Oxford, beyond the point in time when the bus priority measures are delivered along the A40. * It supports the principle of a western link road for Eynsham, as set out at 9.5.40x, not least because it would no doubt significantly reduce traffic levels on Witney Road, Eynsham, and through the existing historic core of the settlement, which would assist in the efficient and reliable operation of buses along the S1 route, for which negotiating a stretch of single carriageway road in the town is currently especially challenging.

* A western link road should not be seen as the sole basis for likely provision of frequent and bus services directly serving the proposed urban extension. It is, however, possible that in the longer term, direct bus links from origins in rural areas south west of Eynsham might prove to be sustainable feeding into high-frequency bus services at the Park and Ride, especially at peak times. Notwithstanding this, frequencies on such a service will no doubt be limited, especially compared with the S1 route. The core service to the settlement should be assumed to operate via the current S1 route. Therefore the pedestrian and cycle connectivity to the east of the SDA is essential for residents to take advantage of that service.

* The provision of the highest quality of connectivity for cycles (and pedestrians) across the A40 to the Park and Ride terminal will also be essential. It is assumed that this would be provided as part of the junction arrangement design for the western link road with the A40 in due course.

Stagecoach broadly supports the modifications and Policy EW1b (e) in particular.

However the effectiveness of this part of the Policy would be enhanced by making more explicit reference to the need to ensure the best possible pedestrian and cycle links are provided to the main direct high-frequency public transport services available on Witney Road in Eynsham, and at the proposed new Park and
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| MM451         | English Heritage       | Historic England | Mr              | Small             | 1088       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 158 | Ride site, as follows:  
"e) the provision of other supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development in particular the impact on the existing village, and incorporating a comprehensive network for sustainable modes of pedestrians, cyclists and public transport with the best possible links connectivity provided to adjoining areas. This should include including a particular emphasis on improving pedestrian and cycle linkages from the SDA into Eynsham, to the West Oxfordshire Garden Village (including the Park and Ride Terminal) and into the surrounding countryside."

| MM57          | CB#73                  | Dr             | Baker           | 127               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 158 | The southern end of the proposed new western link road for Eynsham is shown as cutting through the scheduled monument of sites discovered by aerial photographs at Foxley Farm. Historic England considers that, without further details, a new major route could cause substantial harm to the significance of the monument, which is a designated heritage asset of the highest significance.

In accordance with paragraphs 132 and 133 of the National Planning Policy Framework, substantial harm should be wholly exceptional and only allowed if it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm. We are not convinced that harm to the scheduled monument cannot be avoided, which should be the objective, or that, if the harm is unavoidable, the public benefits of the proposed road outweigh the harm, and we therefore object to the proposed routing of this road.

In addition, the south-east corner of the site abuts the Eynsham Conservation Area. As a designated heritage asset, great weight should be given to its conservation in accordance with paragraph 132 of the National Planning Policy Framework and any development of this site should therefore conserve or enhance the special interest, character and appearance of the Conservation Area as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework. This should be a criterion in Policy EW1b.

| MM59          | RWB                    | Dr             | Barltrop        | 132               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 158 | Policy EW1b: West Eynsham Strategic Development Area
Policy EW1b: West Eynsham Strategic Development Area
It seems unsound to include the West Eynsham SDA option, in this form or at all:
-- Does the inclusion consider adequately the alternative of the Tilgarsely / Eynsham North Garden Village option?
-- Does it have local Eynsham involvement? Should the policy not be guided by the preferences emerging from Eynsham Parish Council and the Eynsham Future initiative? Those appear to be recommending the Garden Village option as more strategic than the West Eynsham option.
-- The development of an A40-B4449 link road and housing south of Chilbridge Rd would result in serious loss of landscape and amenity for the large part of Eynsham that adjoins this area. In comparison, building north of the A40 would not result in anywhere near a comparable loss of landscape and amenity. |
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<td>MM491 Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
<td>-</td>
<td>Crest Strategic Projects</td>
<td>1585</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>Main 158: Policy EW1b 9.2.6 The policy should be revised to refer to the land to the west of Eynsham as a reserve site to help meet the unmet housing needs of Oxford in the event that the proposed Garden Village (2,750 homes) fails to deliver at a rate sufficient to address the unmet needs of Oxford comprehensively during the Plan period to 2031. The development should be limited to 550 dwellings. It should be deleted as an SDA allocation to meet the needs of West Oxfordshire.</td>
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<td>MM733 Angie Titchen</td>
<td>Dr Titchen</td>
<td>1701</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>Policy EW1b, a) '750-1000 homes..' would be a better description, matching EW1a and giving some flexibility of design at the Masterplan stage. Policy EW1b, c) asserts that the provision of a link road is an essential ingredient – this is not a proven case with significant dis-benefits to Eynsham and viability implications. Wording should allow the possibility of a link road after proper evaluation of cost, benefits and alternatives for improving local transport infrastructure at Masterplan stage. Policy EW1i) We would also like provision for shared gardens and a community-run farm for growing local food to make our contribution to lowering carbon emissions in the UK. Policy EW1m): Also consider community energy generation on the primary school roof.</td>
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<tr>
<td>MM744 Berkeley Strategic Land Ltd</td>
<td>Berkeley Strategic Land Ltd</td>
<td>-</td>
<td>Berkeley Strategic Land Ltd</td>
<td>1785</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>4.0 POLICY EW1b: WEST EYNSHAM STRATEGIC DEVELOPMENT AREA (SDA) 4.1 Berkeley supports the proposed West Eynsham Strategic Development Area (SDA) as described at paragraphs 9.5.40s – 9.5.41b, at Figure 9.15 and in Policy EW1b. This proposed allocation will: * Assist in meeting the Council's increased requirement for housing; * Be ideally placed to assist in meeting Oxford’s unmet need; * Deliver a site for a new primary school; * Contribute by way of direct provision and financial contributions to - improved community infrastructure (health, library provision, community buildings, sport and recreation provision, public open space, etc.); - secondary and special needs education provision * Provide further support for the existing village centre and assist in the delivery of additional services and facilities within the strategic allocation; * Assist in the delivery of a new road linking the A40 with the B4449 thereby reducing congestion in the village centre; and * Open up opportunities for additional employment-generating development at and adjacent to the Oasis Business Park on the south side of the village. 4.2 As indicated above, Berkeley has control over the majority of the proposed West of Eynsham SDA as shown on Figure 9.15b. Berkeley has a proven track record in promoting and delivering large, complex strategic sites. Some of its current projects include 1,250 homes with associated services facilities and infrastructure on Land North-East of Bury St Edmunds; circa 500 homes at Abbey Barn South in High Wycombe; and 750 homes with associated services facilities and infrastructure (including a link road and a primary school) at Warfield, near Bracknell).</td>
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4.3 Berkeley’s approach in dealing with large strategic sites is to take the lead on but to work constructively with the Local Planning Authority and other stakeholders in developing a comprehensive masterplan/Development Brief for the site. Berkeley therefore welcomes the reference in Policy EW1b b) to “a comprehensive development led by an agreed masterplan”: Berkeley will be looking at the site comprehensively; and will take the lead in preparing the masterplan.

4.4 The other major landowner in the area identified on Figure 9.15b is Oxfordshire County Council (“OCC”). Berkeley is in early discussions with OCC and is confident that, consistent with the requirements of Policy EW1B, it can work with OCC and the other landowners to deliver a “sustainable integrated community” that will be “a positive addition to Eynsham”. Berkeley is also confident that it can deliver “about 1,000 homes with a balanced and appropriate mix of house types and tenures.” Berkeley would point out however that the process of determining the appropriate “balance” and “mix of house types and tenures” will be influenced significantly by viability issues, which will require discussion and agreement between the Council and the landowners to determine the priorities in terms of infrastructure provision/delivery.

4.5 Berkeley notes that at paragraph 9.5.40u in the Plan it states that “the suitability of the site for strategic development has been assessed in broad terms as part of countywide joint working carried out to determine the apportionment of unmet need from Oxford City. Reference is made also to the assessment made as part of the Council’s SHELAA process and the Local Plan SA. Berkeley has also carried out its own assessment and has looked, in particular, at transportation, flood risk and landscape issues. Further work in this regard (and in other disciplines) has been commissioned to inform the forthcoming Local Plan Examination but from the work done to date, Berkeley can confirm that there are no ‘showstoppers’: the land is suitable for development, available and deliverable.

4.6 Berkeley also notes the reference at paragraph 9.5.40v to the Neighbourhood Plan for Eynsham. Berkeley is aware that Eynsham Futures has recently published the pre-submission version of the Plan for consultation. Berkeley will be responding to that consultation and is keen to work with Eynsham Futures to ensure that there is a consistent and ‘joined-up’ approach to the planning and development of the West of Eynsham SDA.

4.7 Berkeley notes that Eynsham Futures wants the vehicular access to new development to the west to be primarily from the A40 and the B4449. This is consistent with Berkeley’s plans and the requirement in the Submission Draft Plan for “a new western link road funded by and provided as an integral part of the development and taking the opportunity to link effectively with the existing road network on the western edge of the village” (Policy EW1b c)).

4.8 It states at paragraph 9.5.40y in the supporting text to Policy EW1b that “appropriate consideration will also need to be given to the relationship between [the] proposed access arrangements onto the A40 from this site [the West of Eynsham SDA] and from the proposed Garden Village to the north.” Berkeley would go further: it is essential there is a coordinated approach to both sites which, based on the work carried out to date by Berkeley, points to a new roundabout on the A40 as close as possible to the western-most point of the proposed West of Eynsham SDA. This should be reflected in Policy EW1b.

4.9 In this regard, account also needs to be taken of Oxfordshire County Council’s ("OCC") plans for a new park and ride facility north of the A40 and south of the proposed Garden Village access to which should also be integrated with the proposed SDAs north and south of the A40. This should also be reflected in Policy EW1b. Again, based on the work done to date by Berkeley, the best solution would be for cars to access the park and ride from the new roundabout and for buses to use a restricted/dedicated access further east along the A40. Berkeley will be making detailed representations to OCC in this regard in response to the current consultation on these park and ride proposals.
4.10 In addition, appropriate safeguards need to be put in place to secure the southern access to the western link road off the B4449. Berkeley is aware that the Council has resolved to approve an application for new employment-generating development close to the indicative junction with the B4449 shown on Figure 9.15b. Berkeley understands that on the basis that that application is also contrary to policy, the Council is insisting that the applicant enters into a S106 Obligation to ensure that the development assists in facilitating and does not prejudice the delivery of the southern part of the relief road or the junction with the B4449. Given the strategic function of the relief road, it is essential that the Council holds firm on this point and that it is given the full weight of development plan policy.

4.11 Based on the comments made in paragraphs 4.7 – 4.9 above, Berkeley objects to criterion c) in Policy EW1b and suggests that the criterion is amended as follows:

c) provision of a new western link road funded by and provided as an integral part of the development that will include: and taking the opportunity to link effectively
- Effective links with the existing road network on the western edge of the village;
- A new integrated junction on the A40 that will also provide access to the Garden Village and the proposed Park and Ride Facility north of the A40;
- A new junction on to the B4449
The Council will resist any piecemeal development that might prejudice the delivery of this strategic transport improvement

4.12 The first two dashed points at c) above should also be included in Policy EW1a, which relates to the proposed Garden Village north of the A40.

4.13 For the avoidance of doubt, Berkeley would wish to participate at any hearing sessions at which the Land West of Eynsham SDA is discussed and at which the access to the Garden Village and the new Park and Ride is discussed.

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### Respondent Details

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<td>MM744</td>
<td>Berkeley Strategic Land Ltd</td>
<td>Berkeley Strategic Land Ltd</td>
<td>-</td>
<td>Berkeley Strategic Land Ltd</td>
<td>1786</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>POLICY H3 – AFFORDABLE HOUSING</td>
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</table>

5.1 Berkeley notes that the Examination Inspector stated at paragraph 4.2 in his Preliminary Findings - Part 2 that the "3 value zones" approach to affordable housing provision adopted by the Council "was justified" at the time that he published his findings. However, he did state at paragraph 4.1 that it was likely that the viability evidence would need to be updated before the Examination is re-opened and at paragraph 4.2 that "the boundaries between the 3 zones could have been drawn differently."

5.2 Berkeley would endorse these comments and in the absence of any updated evidence from the Council, the company reserves its position regarding the soundness or otherwise of the "3 value zones" approach and the soundness or otherwise of the boundaries between the three zones. Accordingly, Berkeley would wish to take part in any hearing sessions at which these matters are discussed.

5.3 Berkeley notes that Policy H3 proposes a 50% rate in the "high value zone", which includes Eynsham. This is higher than the percentage figure suggested for West Oxfordshire in the county-wide SHMA. That figure was 40%. It is also higher than the percentages adopted by neighbouring districts: in Cherwell, the percentage in the adopted Local Plan is 30% or 35% depending on location; and in the Vale it is 35% across the district. 5.4 In the absence of any updated evidence from the Council to justify 50% affordable housing provision in the "high value zone", Berkeley reserves its position regarding the soundness or otherwise of the Council’s approach and would wish to take part in any hearing session at which this matter is discussed.
5.5 The previous points notwithstanding, Berkeley welcomes the acknowledgement in Policy H3 that the level of affordable housing to be provided on qualifying sites will be subject to viability testing. This is essential in dealing with large strategic sites such as the West of Eynsham SDA where there is a significant amount of infrastructure to provide.

5.6 Berkeley notes also that at paragraph 4.2 in his Part 2 Preliminary Findings the Examination Inspector made the point at his paragraph 4.2 that:

"Later hearings will need to assess whether the combination of affordable housing and infrastructure requirements and the proposed CIL charge are justified for particular locations."

Consistent with this comment, Berkeley would propose that Policy H3 is amended to make it clear that the level of affordable housing on sites that are identified in the Plan as Strategic Development Areas (which includes the Land West of Eynsham SDA) will be determined on a site by site basis having regard to the infrastructure requirements and any CIL charge relating to each site.

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<tbody>
<tr>
<td>MM751</td>
<td>Goldfield Estates</td>
<td>Goldfield Estates</td>
<td>-</td>
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<td>1864</td>
<td>MAIN 158 POLICY EWlb sets out the policy for the West Eynsham Strategic Development Area (1,000 homes), it states:</td>
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<td>&quot;Land to the west of Eynsham to accommodate a sustainable integrated community that forms a positive addition to Eynsham, including:</td>
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<td>a) about 1,000 homes with a balanced and appropriate mix of house types and tenures to meet identified needs including affordable housing.</td>
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<td>b) comprehensive development to be led by an agreed masterplan.</td>
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<td>c) provision of a new western link road funded by and provided as an integral part of the development and taking the opportunity to link effectively with the existing road network on the western edge of the village.</td>
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<td>d) the provision of a new primary school on-site (1.5FE including nursery) on a 2.22 ha site to enable future expansion together with financial contributions towards secondary school capacity as appropriate.</td>
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<td>e) the provision of other supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development in particular the impact on the existing village, and incorporating a comprehensive network for pedestrians, cyclists and public transport with links to adjoining areas, including a particular emphasis on improving linkages into Eynsham, to the West Oxfordshire Garden Village and into the surrounding countryside.</td>
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<td>f) development to be phased in accordance with the timing of provision of supporting infrastructure and facilities.</td>
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<td>g) the provision of appropriate landscaping measures to mitigate the potential impact of development and associated infrastructure.</td>
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<td>h) biodiversity enhancements including arrangements for future maintenance.</td>
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<td>i) provision of appropriate green infrastructure including allotments.</td>
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<td>j) the investigation, recording and safeguarding of the known and potential archaeological significance of the</td>
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Area prior to any development taking place. The results of the investigation and recording should inform the final layout of the development and be deposited in a public archive. Particular consideration will need to be given to the scheduled monument adjacent to the B4449.

k) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.

l) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.

m) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.

n) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.”

We have concerns regarding point b) of the proposed policy which requires development to be led by a masterplan. The interest from developers in bring this area forward for development is well established, Appeal reference APP/03125/W/15/3136815 was allowed in August 2016 for development of 77 new homes on land to the east of the Site. The Inspector noted that the development would not prejudice the comprehensive delivery of a future development to the west.

We recognise that the provision of necessary infrastructure is essential to unlock strategic development sites and in our opinion phased planning and phased planning applications will be necessary to continue delivery of new homes to the west of Eynsham. A number of local authorities are now recognising the importance of such a phased approach and in that context we would respectfully draw your attention to the recent recommendations agreed by Arun Local Plan Sub-Committee on 6 December 2016 http://www.arun.gov.uk/local-plan-sub-committee where it was agreed to invite planning applications:

‘For the first phases of sites being investigated as potential strategic a/locations, where these phases do not adversely affect the delivery of either the whole a/location or the emerging Local Plan and that any infrastructure requirements can be delivered proportionately without adversely affecting the delivery of infrastructure required for the potential allocation or emerging local Plan as a whole.”

We consider that the Site could come forward for development in advance of a masterplan for the wider area provided that a plan for the identified physical and social infrastructure for the wider can be identified and not prejudiced; this can be demonstrated through a planning application. Given the identified housing needs we consider that the policy should allow flexibility for early delivery to ensure that it provides a justified approach to securing development.

Notwithstanding our comments to point b) of the policy we support this proposed new Policy. We consider that the proposed policy will ensure a comprehensive approach to development and will provide an effective policy for delivering new development that is consistent with national policy, supportive by robust evidence, is justified and legally compliant.
LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 158

consider that the link road should connect to the proposed junction of the A40 that will be created by the proposed Park & Ride facility. The link road would then pass through the site, we would suggest that this link could be secured through a legal agreement for an approval of this site to provide a connection through the south.

We appreciate that the alignment of the SDA link road shown in proposed Figure 9.15b is indicative, however, the highway geometry for an acute approach to the A40, as indicated, some distance to the west of Eynsham, will be difficult to achieve in practice and sensibly the SDA spine road should link directly to the proposed Park & Ride junction, to minimise new junctions on the A40 primary route and to focus and manage movement in the area of the Park & Ride site.

There will be a number of existing and new residents of Eynsham who will drive to the Park & Ride to catch the bus service to Oxford, but it is expected that there will be a significant number of pedestrians and cyclists who will also access the Park & Ride site. Direct and safe movement will be important. The new junction will also give the opportunity to re-plan and improve bus services to Eynsham village using the new SDA link road. Oxfordshire County Council’s Park & Ride consultation runs to the 12th January 2017 and we making representation to OCC to future proof the design of the A40 junction accordingly.

Having provided the most appropriate connection to the A40, as described above, the West Eynsham SDA link road would be able to perform the highways and transport function described in the draft Policy text. It is unlikely in our view that the link road would be designed as a ‘by-pass’; it would most likely serve as a residential distributor road to the development, for efficiency of infrastructure and to provide frontage activity and over-looking for pedestrians and cyclists.

The spine road will provide the most appropriate and direct route to the A40/Park & Ride site and for connectivity to the proposed Garden Village to the north. Clear, safe crossings of the A40 will be required, sensibly focussed on the new A40 Park & Ride junction. It is likely that ace will have to consider access to the proposed Garden Village in parallel with the design and development of the Park & Ride site.

Early resolution of the detailed layout of the A40 access will facilitate the comprehensive development of the West Eynsham SDA. Given the need for OCC to meet their funding ‘window’ for the Parle & Ride scheme, it is important that the SDA A40 access is resolved as soon as possible. It is our Intention to work closely with OCC in the planning and design of the A40 junction, following the expected Committee approval to proceed with the detailed design in Spring 2017.

We support the proposed modifications to the Local Plan in particular the increase in growth, in accordance with the submitted evidence and the proposed allocation to the west of Eynsham. We consider that the further evidence submitted and the revised approach to growth to be fully justified and legally sound. We have raised concerns, namely in relation the potential delay in the delivery of the proposed allocation to the west of Eynsham in addition to proposing highways connection of this area to the A40 which we assert must be reconsidered.

4.1 Our clients also support the proposed West Eynsham Strategic Development Area (SDA) as described at paragraphs 9.5.40s – 9.5.41b, at Figure 9.15 and in Policy EW1b. This proposed allocation will:

- Assist in meeting the Council’s increased requirement for housing;
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<td>MAIN 158</td>
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<td>- Be ideally placed to assist in meeting Oxford’s unmet need;</td>
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<td>- Deliver a site for a new primary school;</td>
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<td>- Contribute by way of direct provision and financial contributions to -</td>
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<td>- improved community infrastructure (health, library provision, community buildings, sport and recreation provision, public open space, etc.);</td>
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<td>- secondary and special needs education provision</td>
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<td>- Provide further support for the existing village centre and assist in the delivery of additional services and facilities within the strategic allocation;</td>
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<td>- Assist in the delivery of a new road linking the A40 with the B4449 thereby reducing congestion in the village centre; and</td>
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<td>- Open up opportunities for additional employment-generating development at and adjacent to the Oasis Business Park on the south side of the village.</td>
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<td>4.1 Our clients will work constructively with the Local Planning Authority and other stakeholders in developing a comprehensive masterplan/Development Brief for the site. Our clients therefore welcome the reference in Policy EW1b b) to &quot;a comprehensive development led by an agreed masterplan&quot;</td>
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<td></td>
<td>Kemp &amp; Kemp LLP</td>
<td>WODC Local Plan 2031 Submission Version Including Main Modifications Dec 2016</td>
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<td>4.2 Another major landowner in the area identified on Figure 9.15b of the draft plan is Oxfordshire County Council (&quot;OCC&quot;). Our clients are in early discussions with OCC and are confident that, consistent with the requirements of Policy EW1B, they can work with OCC and the other landowners to deliver a &quot;sustainable integrated community&quot; that will be &quot;a positive addition to Eynsham&quot;. Our clients are also confident that they can deliver a balanced and appropriate mix of house types and tenures. Our client would point out however that the process of determining the appropriate &quot;balance&quot; and &quot;mix of house types and tenures&quot; will be influenced significantly by viability issues, which will require discussion and agreement between the Council and other landowners to determine the priorities in terms of infrastructure provision/delivery.</td>
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<td>4.3 It states at paragraph 9.5.40y in the supporting text to Policy EW1b that &quot;appropriate consideration will also need to be given to the relationship between [the] proposed access arrangements onto the A40 from this site [the West of Eynsham SDA] and from the proposed Garden Village to the north.&quot; Our clients would go further: it is essential there is a coordinated approach to both sites which, based on the work carried out to date, by Berkeley (another stakeholder in the site), points to a new roundabout on the A40 as close as possible to the western-most point of the proposed West of Eynsham SDA. This should be reflected in Policy EW1b.</td>
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<td>4.4 In this regard, account also needs to be taken of Oxfordshire County Council’s (&quot;OCC&quot;) plans for a new park and ride facility north of the A40 and south of the proposed Garden Village access to which should also be integrated with the proposed SDAs north and south of the A40. This should also be reflected in Policy EW1b. Again, based on the work done to date by Berkeley, the best solution would be for cars to access the</td>
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<td>MM78</td>
<td></td>
<td>graham</td>
<td>m</td>
<td>griffiths</td>
<td>220</td>
<td>I think that '750-1000 homes..' would be a better description, matching EW1a and giving some flexibility of design at the Masterplan stage.</td>
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<tr>
<td>MM81</td>
<td>MBERR</td>
<td>Mr Berrett</td>
<td>225</td>
<td></td>
<td>&gt; SECTION 9 STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>Policy EW1b - In SHELAA Site 437 lives significant wildlife including a number of protected species which includes Barn Owls/Screech Owls, Adders, Red Kites as well as a diverse and significant range of Flora and Fauna. There are also Six Spot Burnet Moths and many other insects and mammals. This undisturbed land for over twenty years has allowed wildlife to thrive in abundance and has a more diverse habitat than many other fields near the village - (Recent photo attached in field site 437 of a barn owl as a case in point). A link road and housing on this field would be to the detriment of such wildlife and all other avenues should be explored when considering protected plants(EPS), section 41 priority species and animals listed in the Wildlife...</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2262</td>
<td>MAIN 158</td>
<td>and Countryside Act 1981. Sustaining an open field here will ensure that the rural village edge can be quickly accessed down the bridleway and it is imperative to retain the rural feel to the village and provide rural and undisturbed open spaces for human well being and the protection of many species. The link road has many significant dis-benefits to Eynsham and the whole village would be surrounded by road. It would not make any valuable traffic gains over the eastern bypass and little has been evidenced in terms of proper evaluation of cost, benefits and alternatives for improving local transport infrastructure at Masterplan stage. A Link road and housing would also have a negative visual impact on walkers along the bridleway and accessibility to the outer bridleway would be inappropriate if divided by a link road thus cutting off the village from the current easily accessible space. Additionally the Merton Close development was built as a ‘rural exception’ site defining (by being beyond) the village edge for the south-west corner. It is therefore inappropriate that a development much further out and detached by the intervening flood zone should be placed south of the Chil.</td>
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<tr>
<td>MM98</td>
<td>Paul Luna</td>
<td>Professor Luna</td>
<td>Luna</td>
<td>254</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>Policy EW1b (following 9.5.41b) e) the provision of other supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development in particular the impact on the existing village, and incorporating a comprehensive network for pedestrians, cyclists and public transport with links to adjoining areas, including a particular emphasis on improving linkages into Eynsham, to the West Oxfordshire Garden Village and into the surrounding countryside. We suggest the following changes to ensure this policy is in line with LTP4. Suggested text to replace point 'e)': provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes such as the A40 Strategy; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians, and cyclists with links to adjoining areas, including the park and ride, Eynsham village, Tilgarsley Garden, and Hanborough Station. Provision of individual Travel Plan (and associated Travel Information Packs) for the residential and employment areas, as well as the school. The County Council has experienced significant difficulties in securing appropriate mitigation measures for the impact of strategic development areas where portions of the site have come forward as separate planning applications. To help reduce the occurrence of this issue we propose this additional text: The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.</td>
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<td>MM246</td>
<td>Judith Luna</td>
<td>-</td>
<td>Luna</td>
<td>452</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock</td>
<td>Development West of Eynsham. This cannot be described as ‘of a proportionate and appropriate scale to its context’ because it will have ‘harmful impact on the amenity of existing occupants’ without mitigating infrastructure in place. The sustainability of secondary school, heath, and sewerage provision will be problematic with the increase in population envisaged by this large extension of the village.</td>
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Policy OS2

The proposed development of 1000 houses west of Eynsham is not compatible with the General Principle that all development should be of a proportionate and appropriate scale to its context; the size of the development is disproportionate to the existing size of the village and it will have a ‘harmful impact on the amenity of existing occupants’ (General Principle 4) unless significant mitigating infrastructure improvements
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<td>MM256</td>
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<td>Kate Williamson</td>
<td>-</td>
<td>466</td>
<td>Sub Area &gt; MAIN 158</td>
<td>are made before any houses are built. The proposed development will not 'protect the local landscape' (General Principle 5) as it will encroach on the open countryside, and raise the risk of flooding in the area.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>Increased flood risk resulting from such a large-scale development so close to flood-plain areas is of great concern, as is the capacity of the existing sewerage network to cope with increased demand.</td>
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<td>MM116</td>
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<td>Paul Mr Hughes</td>
<td>Ms</td>
<td>522</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>Having looked on the Eynsham Futures website and the early design plans of the 1000 home western extension to Eynsham, I have great concerns over the possibilities of future flooding events in this area, damage to the Chil Brook and destruction of wildlife habitat. The information on this possible extension is so sketchy in the Local Plan that I can find no satisfactory answers to these concerns.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>I also have great concern as to how basic services such as education, access to nurseries, access to GPs, access to dentists, provision of emergency services and the provision of social care for the elderly will be managed with a greatly increased population in West Oxfordshire. This will be a particular issue in the main towns/villages of Witney, Carterton, Chipping Norton, Eynsham and Woodstock, where the overwhelming majority of new houses will be built.</td>
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<td>Having looked at the Oxfordshire County Council consultation on the A40 and Eynsham 'Park and Ride' proposals I am even less convinced that they will see the necessary modal change in transport away from cars that is required. By their own figures the huge expenditure on these proposals will not see a fall in car usage along the A40 by 2031 and bus times will be shortened by only 10 minutes. The loss of trees and hedgerows is worrying, as is potential damage to the Oxford Meadows SAC. I am not convinced they take fully into account the new 'Garden Village' and science park, or 1000 home extension to Eynsham and it’s impact on congestion and air quality.</td>
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<td>Thank you for accepting these additional comments and I look forward to seeing the results of the consultation and hopefully the council addressing all of the concerns raised by residents.</td>
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<td>MM332</td>
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<td>Ms Couch</td>
<td>Ms</td>
<td>636</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>Policy EW1b) West Eynsham</td>
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<td>The Eynsham Neighbourhood Plan has worked hard to make sure that any development here would be well integrated into the village and that the access to countryside is not limited. The Local Plan proposal uses all the</td>
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<td>MM366</td>
<td></td>
<td>Sue Chapmane</td>
<td>Ms Chapmane</td>
<td>679</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>May I make a plea that if we are to have a garden village north of the A40 at Eynsham the 1,000 to the west will be used as a reserve nearer the end of your Local Plan. I know West Oxfordshire has to find housing but the planning chaos of trying to keep up with the infrastructure for both sites will be unfair on existing residents.</td>
</tr>
<tr>
<td>MM374</td>
<td>Carillion Capita</td>
<td>Jeremy Flawn</td>
<td>Mr Flawn</td>
<td>748</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 158</td>
<td>OCC Property &amp; Facilities strongly supports the identification of land to the west of Eynsham (1,000 homes) to accommodate a sustainable integrated community that forms a positive addition to Eynsham, including the provision of a new western link road, a new primary school on-site (1.5FE including nursery) and the provision of other supporting infrastructure as described in policy EW1b. This site will play a significant role in helping to meet West Oxfordshire District Council’s objectively assessed housing needs and OCC P&amp;F is keen to work with the District Council, Parish Council and other key stakeholders to help deliver this important development.</td>
</tr>
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| MM377         | Bike Safe               | Ian Leggett     | Mr Leggett       | 761               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 158 | 1. These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Bike Safe.  
2. Bike Safe are a registered charity which was set up to promote an off-road multipurpose path for cyclists and pedestrians along the B4044 between Eynsham and Botley/Oxford, via Farmoor. The path crosses the boundary between the Vale of White Horse and West Oxfordshire districts.  
3. Bike Safe have prepared technical design work for the path received in principle support for the proposed community path from Vale of White Horse planning officers and Oxfordshire County Council through a pre-application planning request (Ref 15/V1482/PEM).  
4. Bike Safe and the B4044 Community Path project are also explicitly referenced in the submitted draft West Oxfordshire Local Plan 2031 which states that:  
9.5.49 Active travel will be positively encouraged to capitalise on the proximity of this sub-area to Oxford City. Existing pedestrian and cycle routes will be safeguarded and opportunities for new and enhanced routes will be identified. Where appropriate, we will seek walking and cycling schemes from new development either directly or through a financial contribution. Initial work has been instigated by a local group called ‘bikesafe’ looking at the potential to introduce a dedicated cycle route along the B4044 Eynsham Road. The Council will work with the group and other relevant partners including the County Council to further consider the merits and possibility of this scheme being taken forward.  
5. The draft West Oxfordshire Local Plan recognises the potential of the B4044 community path to facilitate |
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active and sustainable travel to Oxford City. The commitment to work with the group is welcomed.

6. Bike Safe however object to Policy EW1a West Oxfordshire Garden Village SDA (Main Modification 155) and Policy EW1b West Eynsham SDA (Main Modification 158) due to the lack of reference to contributions from these developments towards the provision of the B4044 Community Path.

7. Both of these allocations are substantial and will generate significant traffic from the new housing and to the proposed new business park.

8. The B4044, although a ‘B-road’, is a well-used commuter route between Oxford, Science Vale and West Oxfordshire.

9. The B4044 community path will connect and provide a safe route for around 15,000 people living in the three parishes along the route- Eynsham, Cumnor and North Hinksey. It will also provide an attractive and sustainable commuter route for cyclists between the Eynsham and West Oxford growth areas.

10. The B4044 road surface is poor in places and there is no provision for pedestrians and cyclists along this road. The verge is full of hidden holes and unsafe to walk on. The road is a key route which carries up to 12,000 vehicles per day with speeds up to 50mph. The carriageway is too narrow for two vehicles and a bicycle to pass safely. The road winds along its route which limits opportunities for vehicles to safely overtake walkers or cyclists. This frustrates drivers and stops most cyclists and pedestrians from using it. It is just too unsafe.

11. The community path will have a number of key benefits:

i. Much more attractive for commuters to cycle with reduced congestion and CO2 emissions;
ii. Improved and sustainable connections for existing communities to access facilities at Farmoor, Botley, The Hill End Centre and Oakenholt Care Home;
iii. Health benefits of walking and cycling and improved connectivity and social inclusion;
iv. Safer road conditions for cars and buses;
v. Improved countryside access including to the Thames Path.

12. The route has widespread public support. It also has the support of the Parish Councils through which it passes and key businesses such as Stagecoach and Siemens. Initial discussions have been held with the major landowners who have indicated their support.

13. As a charity Bike Safe has raised significant funds from the public through sponsored rides and runs and from grant giving bodies. This has enabled environmental surveys to be undertaken and the commissioning of the technical design by engineers InfrastructCS. The environmental surveys and the technical path design has been made available to the Council and can be made available to the Local Plan Inspector on request.

14. Based on this technical design the cost of providing the path will be significant and is estimated at £2.9m.

15. Bike Safe propose to continue to raise funds to contribute towards the planning and build costs and is unique in Oxfordshire in helping to raise this local contribution.

16. The delivery of the path however will require additional funding. Given the location of the proposed SDAs at Eynsham, the additional traffic generated on the B4044 will make conditions worse for pedestrians and cyclists.
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| MM3          |                         | richard andrews | Mr               | Andrews           | 80         | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 158 | 17. Bike Safe consider is necessary that these SDAs should make financial contributions towards the implementation of B4044 Path to achieve the suggested focus on sustainable travel and to mitigate their traffic impact.  
18. This is in accordance with paragraph 9.5.49 of the plan as quoted above. Bike Safe consider, however, that the wording of Policies EW1a and EW1b should include a specific reference to the B4044 path.  

EW1b Comment: Unsound – lack of consideration of alternatives may result in non-delivery of the total of 3200 homes in the Eynsham area.  
The changes to the LP make no allowance for non-delivery of any particular site. There is no reserve provision within the SDA/AAP areas at Eynsham.  
The Eynsham Neighbourhood Plan (ENP) accepts the figure of 3200 new homes within the Parish and has explained in earlier submissions (9.5.40a) why it may be wiser to build faster in the new settlement north of the A40 to ensure a sustainable free-standing settlement with all the necessary facilities and infrastructure is created.  
The ENP does include 600 new homes to the west of Eynsham as its reserve site for development in the future but with the possibility of development within the currency of the 2031 Plan if problems are found which delay or limit the delivery of new homes north of the A40.  
The ENP considers that 1000 new homes on the proposed site is very optimistic with a high risk of not being able to deliver this number and regards development of the land south of the Chilbridge Road to be very detrimental to both local amenity and rural setting of Eynsham as well as requiring a disproportionately expensive and intrusive Link Road to access what is otherwise a site that is poorly related to the rest of the village.  
Development of the land north of Chilbridge Road can be accessed by a less expensive local road from the A40 and be developed with much less harm to the existing village. The ENP considers this site can readily accommodate 600 new homes. 160 of these have already been given outline consent on a site which has good through pedestrian and cycle access to the village while this site will itself benefit from better access directly to the A40 avoiding village streets. This access through Thornbury Road is not ideal for vehicles as it joins Witney Road at a point opposite Bartholomew School which becomes very congested when students are being dropped off or picked up but does provide an alternative ‘emergency access’ point for a western development.  
The ENP considers that focussing all additional development on the new settlement is important to ensure it can quickly get up and running as a sustainable free-standing community. Therefore it proposes that the western extension of Eynsham be kept in reserve rather than pursued in competition with the new settlement. However, it is accepted that the west of Eynsham is suitable for development at some point and therefore the ENP expresses a strong preference for a single SDA / AAP during the early stages of preparing a Master Plan to both integrate and separate the two communities as necessary so that they can become free-standing, complementary villages.  
EW1b c) Comment: Unsound – no justification has been provided for requiring a link road whose cost may jeopardise the viability of a western extension. |
The ENP once regarded the provision of a western Link Road as a useful way of accessing a western
development. Further study revealed that a Link Road between A40 and B4449 main roads is unattractive
both financially and in terms of amenity and landscape impact with unproven and probably limited economic
benefit. A simple access road running through a development from the A40 to join up with Chilbridge road
will access 600 houses. A Link Road will use space that could otherwise be used for housing, will be much
more expensive to construct with a visually intrusive crossing of the Chil Brook and cross-roads junction with
the private Chilbridge Road and will only allow some 250 extra homes to be built on a site that is not well
related to the rest of the village.

Para c) should not assert that a Link Road should be constructed without allowing due justification or
consideration of alternatives. A lower-cost, less intrusive, spur from the A40, backed up by ‘emergency only’
access along Thornbury and Chilbridge Roads, offers an acceptable alternative and should not be dismissed
without due consideration.

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<th>Ainscough Strategic Land</th>
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<th>Ainscough Strategic Land</th>
<th>892</th>
<th>West Eynsham SDA (MM158)</th>
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4.62 Capacity: The West Eynsham SDA is a new allocation in the Proposed Modifications of 1,000 homes.
Whilst the capacity of the site has not been justified we do not take issue with these capacity figures.

4.63 Ownership: The site is within several ownerships and separate land parcels have been promoted for
development through the Strategic Housing and Economic Land Availability Assessment.

4.64 Delivery: Within the SDA there is an application for up to 160 homes off Thornbury Road
(15/03148/OUT) which was validated in August 2015. This application has still to be decided and we are not
aware of a targeted committee date.

4.65 The Council's trajectory identifies first completion at the SDA in 2018-19. Bearing in mind the outline
application has yet to be determined, this could be regarded as a little optimistic. However, we have stuck
with this for the purpose of this assessment noting the 160 dwelling parcel that is subject to the above
application.

4.66 The remaining 840 homes is more complicated and requires the delivery of a link road and other
infrastructure requirements. No application has yet to be lodged and bearing in mind with wider allocation
has only been identified as part of the proposed Modifications to the Local Plan, it would not be unreasonable
to apply NLP's average lead in time of 3.1 years for an application and 6.9 years for commencement. Indeed,
given the proximity of the Garden Village proposal it is inevitable that the impacts of both schemes will need
to be assessed at the same time (most likely through an EIA due to cumulative impact issues), which will draw
out the process.

4.67 Notwithstanding the above concerns, given the site is smaller than the Garden Village and less complex
than that proposal, we could see development start a little sooner (2023-24) than what we have projected for
the Garden Village. In applying this start date to NLP's build out rates of a site this size (105 dpa), the site
would just about be built out by the end of the plan period. However, it is worth noting that the site is on the
cusp of the NLP threshold for a build out rate of 105 dpa. Indeed, sites up to 999 dwellings were put within
the 68 dpa category, which would extend the build out period well beyond the plan period. We have rounded
the annual delivery down to 100 units for ease and consistency with other sites that we have assessed
through this process.

4.68 Infrastructure: The delivery of the remaining SDA (840 homes) is dependent on the delivery of a new
western link road which will serve the new development as well as provide a strategic road connection. The provision of this link road will be sought as an integral part of a comprehensive development to the west of Eynsham. Furthermore, highway improvement which are necessary to bring forward this SDA are dependent on the delivery of the Garden Village SDA which the Council envisage coming forward in 2021-22 and we have suggested would commence in 2024-25.

4.69 Conclusions: Notwithstanding the complexities in Eynsham, we have concluded that there is a small chance of it being complete within the plan period. However, this will be a significant undertaking and does not accord if we apply the assumptions used by NLP. However, in order to take a pragmatic and robust approach, we have maintained that it will be built out within the plan period for the purpose of this assessment.

The West Eynsham strategic development area contains areas of Flood Zone 2 and 3 associated with the Chil Brook.

The allocated site at Woodford Way Car Park, Witney contains an area of Flood Zone 2 originating from the River Windrush.

Paragraph 100 and 101 of the National Planning Policy Framework (NPPF) requires that a Strategic Sequential Test is undertaken to ensure both the strategic allocation, and the Plan are sound. The Strategic Flood Risk Assessment will provide the basis for applying the test and a sequential approach. Once the Sequential Test is undertaken the Exception Test would be required in accordance with Paragraph 102 of the NPPF.

Although mention is made of suggested, currently unfunded, improvements to the A40 between Witney and Eynsham, it has to be recognised that the route will still be subject to the congestion problems nearer to Oxford. Also because of the problems created by any perturbations, the only reliable long term solution will be to re-open the old railway line between Yarnton Junction and Witney. A re-opening of the Witney line will provide direct rail access to the economic growth areas in Oxfordshire and beyond and to Heathrow Airport. To this end the line of the old railway should be safeguarded from development along with any necessary deviations around developments that have occurred since the railway was closed. The old line crosses the southern tip of the West Eynsham site and the proposed western link road. It is important to ensure that the link road does not block railway reopening and at the same time this area would be a prime location for a railway station served by the link road, giving direct access for the residents of the 1000 new houses.

Paragraph 9.5.41c confirms that other than the Garden Village at Eynsham, the only other strategic options considered by the Council in this sub-area were land at Barnards Gate (between Witney and Eynsham) and land to the east of Woodstock (the majority of which is actually in Cherwell).
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<td>MM491</td>
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<td>1587</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 159</td>
<td>We do not object in principle to the allocation of the Garden Village at Eynsham. However, it is clear that the Council did not consider, as a reasonable alternative, the opportunity provided on land adjacent to Hanborough Station – land that the Council identifies in the SHELAA as available for development. As set out in our representations to Policies OS2 and EW2, this is a fundamental soundness and legal flaw in the Council's process as the Long Hanborough option is clearly a reasonable alternative to the selected options, providing an opportunity to develop housing in a location: &quot;in close proximity to Oxford and therefore able to meet both Oxford's unmet needs as well as West Oxfordshire's own needs; &quot;that is outside the Green Belt and AONB; &quot;adjacent to Hanborough Station, one of the biggest and most well-used stations in the District, the closest station to Oxford and a station where capacity and frequency improvements are planned, and even more significant aspirations have been identified; and &quot;that is a Rural Service Centre.</td>
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<td>MM733</td>
<td>Angie Titchen</td>
<td>Dr Titchen</td>
<td>-</td>
<td>Titchen</td>
<td>1702</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 159</td>
<td>Para 9.5.41 c-d: no consideration seems to have been given to spreading some of Oxford's unmet needs wider, offering at least some alternative to living in one 'village' location with one transport option. Lifestyle choice is at least as important as just being close to Oxford if this is not to be an Oxford overspill estate. I strongly agree with this statement from the Eynsham Futures group.</td>
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<tr>
<td>MM751</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 159</td>
<td>MAIN 159 Para 9.5.41c-9.5.41e set out the alternative options that have been considered. We agree that considering these alternatives is the correct approach to demonstrate that the plan has been positively prepared and that the proposed Policy is legally compliant and sound.</td>
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<td>MM61</td>
<td>NP</td>
<td>Mr Pearce</td>
<td>-</td>
<td>-</td>
<td>202</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 159</td>
<td>The Barnard Gate alternative option is dismissed in a single sentence. It may be for good reasons, but what exactly are these &quot;sensitivities&quot; that led to its exclusion as a preferred option, and how do they differ from the sensitivities in the two Eynsham sites?</td>
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Not mentioned in the WODC evidence base (unless I have somehow missed it) is the "Oxford Spatial Options Assessment, Final Report, September 2016", produced by Land Use Consultants (LUC) for the Oxfordshire Growth Board and Oxford City Council. This document makes judgements on suitability of the proposed development sites. Interestingly, "Land north of Eynsham" (Garden Village - 148.21 ha), "Land west of Eynsham" (38.29 ha) and "Eynsham Park Estate, land nr Barnard Gate" (Barnard Gate - largest at 185.51 ha) are all marked orange, not green, for "deliverability". Land west of Eynsham is also orange for (financial)
"viability". The other two are green for viability. So what’s the difference between the proposed Garden Village site and the apparently unsuitable Barnard Gate? Putting it another way, if Barnard Gate and the Garden Village site are both orange/green, why is the former unsuitable but not the latter?

The LUC document says (Table 5.6.19) that, because of the quality of the agricultural land on the proposed Garden Village site, “it is assumed that development here would have a significant negative effect on efficient land use and preserving soil quality”.

The document says (Table 5.6.20) that a minor negative effect on Oxford Meadows SAC (2.5km away) “is considered likely”. So clearly it would be far worse for the “Site of European Importance for Arable Plants” at City Farm.

The document says (Table 5.6.25): “Development at this site would be very likely to give rise to adverse landscape and/or visual effects, and there is some potential for these to be significant; therefore a potential but uncertain significant negative effect is identified. This site is assessed as having medium-high landscape sensitivity [as] a result of its strong rural character with little modern development, frequent woodland cover along field boundaries and at Eynsham Wood [Millennium Wood] and open views, particularly in the east of the site. Some areas of the site are more prominent, such as Acre Hill.”

The document also makes one or two strange, but significant, mistakes. In Table 5.6.24, it correctly mentions the Grade II listed buildings in the Eynsham Village Conservation Area, but inexplicably fails to mention the Grade II listed buildings in City Farm [Garden Village]. In addition, Table 5.6.17 says: “This site [Garden Village] does not include areas of flood zone 3, and only includes less than 1% flood zone 2 in the eastern boundary of the site.” This is manifestly incorrect, as the Environment Agency’s flood risk maps make abundantly clear. In fact, the very definite area of flood zone 3 in the Garden Village must be roughly the same size in percentage terms as the flood zone 3 area in Barnard Gate.

If this document is one on which WODC has based some of its planning decisions, you do wonder how many more mistakes have crept in, and to what extent the Council’s decisions are relying on faulty evidence.

Incidentally, I see that LUC was appointed in May 2015 by Oxfordshire County Council (on behalf of the Oxfordshire Local Authorities) to undertake an assessment of the Green Belt within the County. Is there a conflict of interests here?

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<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>586</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 159</td>
<td>MAIN 159, Para 9.5.41d</td>
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Incidentally, I see that LUC was appointed in May 2015 by Oxfordshire County Council (on behalf of the Oxfordshire Local Authorities) to undertake an assessment of the Green Belt within the County. Is there a conflict of interests here?

Para. 9.5.43e acknowledges that land to the east of Woodstock lies partly within West Oxfordshire and primarily within Cherwell District. It states, ‘Whilst the joint work on unmet need concluded that the site had some merit it also had a number of important sensitivities not least the potential impact on the Blenheim Palace World Heritage Site (WHS). The [West Oxfordshire] District Council considers that a smaller development on the portion of the site which is within West Oxfordshire is appropriate and this plan identifies an allocation of 300 homes. There is also a current planning application on the site.’

The potential of this smaller area of land has of course previously been included in your draft Plan in the interest of meeting West Oxfordshire’s needs. We have no objection to that proposal. However, we would ask that development of that site should not prejudice the consideration of land to the east through this Council’s
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| MM3          |                         | richard andrews | Mr Andrews       | 81                |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 159 | The comments are made on behalf of Eynsham Parish Council.
<p>|              |                         |                 |                  |                   |            |                   | 9.5.41c Comment: Unsound – the consideration of alternatives noted here were done in such a pre-judged manner as to be open to legal challenge thereby delaying the delivery of much-needed new housing. |
|              |                         |                 |                  |                   |            |                   | The parameters for consideration of 'alternatives' to allocating all of Oxford's unmet need at Eynsham was done in such a way that Eynsham was the only choice of location. A recent questionnaire sent out as part of Eynsham's Neighbourhood Plan consultations has shown that a Garden Village development to provide much needed housing has the support of those responding, but there is much resentment at what is seen as a biased process and particularly the allocation of 550 houses specifically to west Eynsham. This may be used by others opposed to the allocation of any Oxford City housing to West Oxfordshire to attempt a legal challenge that will delay the development process while Eynsham actually wants to get on with the Garden Village as quickly as possible. |
|              |                         |                 |                  |                   |            |                   | There is also a major concern about choice. Allocating all the housing to one place - it is not two sites a few hundred metres apart adjacent to the same A40 are not in reality separate places – treats all the people whose housing need has not been met in Oxford City as clones, not people. They are only being offered one expensive semi-rural location and one already-congested route into the city or beyond. |
| MM448       | Woodstock Town Council  | Woodstock Town Council | Mrs Grant       | 1043              |            | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 160 | The level of housing proposed in WODC's 'Local Plan 2031 - Submission Draft Including Proposed Modifications' is wholly inappropriate for the location and will ultimately destroy the town's unique historic character. |
|              |                         |                 |                  |                   |            |                   | It is clear from the above that all draft allocations proposed for Woodstock are unsuitable and will be detrimental to the town. Even ICOMOS UK stated that, for Woodstock East, the replacement of open farmland with a major development would have a negative impact on the tranquillity of the closest part of the Blenheim Palace estate in terms of traffic and light pollution. Due to their proximity to Blenheim Palace, it will no doubt make similar comments on the other proposed sites during this consultation. |
|              |                         |                 |                  |                   |            |                   | This will in-turn damage Woodstock's tourism upon which the local economy relies heavily on. |</p>
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<td></td>
<td>Derek Moody</td>
<td>Mr</td>
<td>Moody</td>
<td>1297</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 160</td>
<td>The site assessment carried out by WODC on each site is flawed and in many cases lacking evidence to support important assumptions. Development proposed in the surrounding areas (Witney, Hanborough, Chipping Norton, Kidlington and Oxford Northern Gateway) will severely exacerbate the highways problems already associated with the A4095/A44. Such a large combination of developments around Woodstock will severely compromise the wilderness of our World Heritage Site and spoil the special look of the town. A smaller, or infill development would be far more appropriate in line with the town council’s ‘vision.’</td>
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<tr>
<td>MM557</td>
<td></td>
<td>Sarah Jane Airey</td>
<td>Ms</td>
<td>Airey</td>
<td>1308</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 160</td>
<td>I would like to pass you our comments on the draft local plan in relation to the town of Woodstock: • The area of the proposed building would just about double the area of Woodstock town, surrounding it with new development. Arguably it would have been better to just have development on just one site rather than three which will circle the town on all three sides, with Blenheim on the fourth. • This would spoil the town which is particularly historic and noted for its beauty - both natural and architectural. These aspects of Woodstock are not restricted to the Blenheim Palace site alone. It would seem Blenheim is happy to spoil the aspects of the town, provided it doesn’t impact on the immediate vicinity of its own site lines. • The number of houses proposed is very large in relation to the number in Woodstock. • The centre of Woodstock is not able to cope with parking, there is not enough for current needs. Likewise other facilities and community amenities such as schools and the medical centre will not be able to cope with the influx of people. • The roads can’t cope with existing traffic let alone more. Traffic going towards Oxford city is diabolical through Yarnton and Begbroke during the rush hours. It is grossly unfair that Oxford city is not meeting its own housing needs and forcing the shortfall onto the district councils. It has sites it could develop but does not appear to wish to do so. The proposed sites for housing around Woodstock are totally inappropriate. The town does not have the infrastructure, our schools and doctor’s surgery are full. Traffic is becoming a nightmare, particularly for those houses fronting the A44 and the town centre is struggling because there is inadequate parking. Woodstock as a small historic town would be ruined by this over-development. Also consideration should be taken of Cherwell’s proposed sites of ‘Woodstock East’ and land adjoining the A4095 and the airport. Woodstock could become just a dormitory for Oxford - almost joined to Kidlington in 20-30 years. Please stop this development and allow Woodstock to retain its historic character.</td>
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<tr>
<td>MM596</td>
<td></td>
<td>Margaret Seume</td>
<td>Mrs</td>
<td>Seume</td>
<td>1372</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 160</td>
<td>The proposed sites for housing around Woodstock are totally inappropriate. The town does not have the infrastructure, our schools and doctor’s surgery are full. Traffic is becoming a nightmare, particularly for those houses fronting the A44 and the town centre is struggling because there is inadequate parking. Woodstock as a small historic town would be ruined by this over-development. Also consideration should be taken of Cherwell’s proposed sites of ‘Woodstock East’ and land adjoining the A4095 and the airport. Woodstock could become just a dormitory for Oxford - almost joined to Kidlington in 20-30 years. Please stop this development and allow Woodstock to retain its historic character.</td>
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<td>MM491</td>
<td>Crest Strategic Projects</td>
<td>-</td>
<td>Crest Strategic Projects</td>
<td>1589</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL Main 160: Paragraph 9.3.41f</td>
<td>9.28 As set out elsewhere in these representations the proposed allocations at Woodstock are not justified having regard to the evidence base and are not in accordance with the preferred spatial strategy. The</td>
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<td>MM772</td>
<td>Spitfire Homes</td>
<td>Spitfire Homes</td>
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<td>Spitfire Homes</td>
<td>MAIN 160</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 160</td>
<td>proposed allocations at Woodstock should be deleted.</td>
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<td>MM778</td>
<td>Kier Group</td>
<td>Kier Group</td>
<td>-</td>
<td>Kier Group</td>
<td>MAIN 160</td>
<td>Sealed Modification 160 – Paragraph 9.5.41f</td>
<td>In line with comments made in respect of Main Modifications 27 and 30 (see above), Table 9.4 and Paragraph 9.5.41f should be updated to include a housing allocation comprising 'Land South of Abingdon Road, Standlake (50 homes)'. This will provide greater flexibility to the Local Plan and housing delivery, which the Council recognises is constrained in the shorter term. In turn this provides for a positively prepared Local Plan which could be considered 'sound'. The Council will be aware that Spitfire Homes has engaged in pre-application dialogue concerning their specific site interest South of Abingdon Road, Standlake. In line with recent dialogue, this engagement has demonstrated the form of development that Spitfire Homes consider could come forward with in the next 5 year period to 2021.</td>
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<tr>
<td>MM141</td>
<td>Christine Lea</td>
<td>Mrs Lea</td>
<td>-</td>
<td>Lea</td>
<td>MAIN 160</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 160</td>
<td>The following comments on the Draft West Oxfordshire Plan 2031 relate purely to Woodstock. While I appreciate that we must have growth in the town, I believe the proposed number of houses is too great. The town currently has 1500 homes and has grown organically over hundreds of years. The proposals are for a further 670 homes which would add half as many again. This is totally disproportionate. The sites have been selected because Blenheim wants to sell land at a high price and cares little that it will destroy the viability of the current community. Traffic Already the A44 is overburdened with traffic, including very many heavy lorries which endanger pedestrians on the very narrow pavements. The 120 homes north of Hill Rise would considerably add to this burden as the location is too far from the centre of Woodstock for most people to walk into the town. The 250 houses north of Banbury Road would cause serious traffic issues in the already busy road. With two...</td>
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schools on the road plus an evergrowing number of Pye/Blenheim developments the road is probably at capacity in rush hour.

The three developments would add enormously to the problems on the A44 south of Woodstock which is already a serious problem in rush hour. Proposed developments in Long Hanborough and Witney will exacerbate the problems.

Car parking

As West Oxon CC has admitted, parking spaces in Woodstock are now 98 per cent full. Just how does the Council propose to improve this situation? It refuses to charge for parking, it provides hardly any warden coverage so spaces are taken up all day. How will Woodstock cope with around 1000 more cars without dying on its feet? Already local residents are often forced to go outside Woodstock to shop because they cannot park. This is very bad for our loyal local shopkeepers. If I believed West Oxon would take this problem seriously it would be a different matter.

Blenheim, which will gain enormously if these plans are adopted, could quite well create a longterm parking area just inside the Hensington Gate from 8.30am to 6pm for people who work in the town and who would obtain permits from the Palace.

Services

Sewage, water, doctor’s surgery, schools would be just some of the services totally ill equipped to deal with such a large increase in the town’s population. At present our surgery is considered to be the second worst in Oxfordshire. We will not get a new one until Pye/Blenheim get one of the developments approved. The fact that the sale of the police station/building a new surgery was never put out to tender is very concerning. The town is being held hostage by this powerful partnership.

Where we live the foul water drains regularly block and in the past we have had sewerage coming up via the bath plughole and pouring out of the garden manhole. However will the drains cope with all the proposed extra houses?

Loss of natural environment

Those who live in the town and those who visit prize its coherence. Residents did not choose to live in suburbia; they chose a very small town. There is a very attractive town centre and one is quickly out into fields and countryside. Building such large scale developments would have a detrimental effect on the town and its rural surroundings.

Conclusion

While I fully understand that Woodstock must take its fair share of additional development, I maintain that the number of homes proposed is far too high and should be considerably reduced. The Council constantly refers to Woodstock as being a SUSTAINABLE community. With 670 more houses and a town centre which cannot be expanded, it would cease to be sustainable.

I would also point out that the 300 homes east of Woodstock (subject to a current planning application) could be joined by another 1000 if Cherwell gives approval to developing the remainder of the site which is under its jurisdiction. That would truly be the end of Woodstock as we know it.
I object to the inclusion of the following planning allocations in the Draft Local Plan 2031:

1. Land North of Hill Rise- (120 houses) The nature and location of this proposed allocation on a hill site bordering the heavily trafficked A44 will NOT provide a “safe and suitable access” or exit for vehicles, pedestrians and cyclists. It should be deleted on highway safety grounds due to cumulative increases in traffic and accidents. A similar planning application for this site was rejected in 2013. Nothing material has changed.

2. Land North of Banbury Road off Green Lane (250 houses): The location of this proposed allocation adjoins the Glyme and Dorn Rivers Conservation Area. It is an inappropriate and unacceptable use of productive farmland, which will lead to the deterioration and loss of important biodiversity habitats. It will adversely impact upon the bordering natural Conservation Area. Traffic volumes will increase on Banbury, Hensington, Shipton Roads and the A44 with associated increases in traffic accidents and lung damaging air pollution in the area.

I therefore call for the deletion of these traffic and environmentally damaging allocations from the finalized Local Plan 2031.

The identification of sustainable development sites is a matter for your Council. However, you will be aware that there is an on-going cross-boundary strategic issue related to Cherwell making its contribution to Oxford’s unmet housing needs through the on-going Partial Review of the adopted Cherwell Local Plan Local Plan 2011-2031 (Part 1).

This Council consulted on an Issues Paper for the Partial Review of its Local Plan from January to March 2016. That consultation was accompanied by a ‘call for sites’. You will be aware that we are presently consulting on an Options Paper including Areas of Search and potential strategic development sites. Land adjoining Woodstock (next to your proposed allocation for 300 homes - Policy EW1) is included within Cherwell’s Area of Search ‘B’ (North and East of Kidlington) and initial sustainability work has suggested to us that Area B, together with neighbouring Area A (Kidlington and Surrounding Area), should proceed to site assessment. Within Area B, two sites adjoining Woodstock are being promoted by Blenheim Estates – site 22 ‘Land north west of London Oxford Airport, nr. Woodstock (48.72 ha) and site 25 ‘Land east of Marlborough School,
Woodstock’ (6 ha) (see attached extract).

The current consultation period closes on 9 January 2017 and this Council intends to prepare a Proposed Submission Document for consideration by its Executive in April 2017. If approved, officers would proceed to a six week period for representations in time to enable Submission by 20 July 2017 (two years from adoption of the Cherwell Local Plan). This would ensure accordance with para. B.95 of the Cherwell Local Plan.

As officers need to consider the feedback from the current consultation and complete the Local Plan evidence base it is not possible to advise at this stage on whether land at Woodstock would feature in the Proposed Submission document. However, conversely, the land cannot be ruled out. Its relative proximity to Oxford, its situation outside (but adjacent) to the Oxford Green Belt and its location on a main transport corridor which features in the County Council’s Oxford Transport Strategy, are factors that will require close consideration together with Woodstock’s global and local historic assets, its characteristics, constraints and opportunities.

West Oxfordshire’s Local Plan, as Proposed to be Modified, recognises the merits of Woodstock as a location for a ‘reasonable scale of development’ for West Oxfordshire, noting its ‘relatively good range of services and facilities’ and assisted by the town’s dual role as a tourist centre and a service centre (for example, para’s 4.18b, 5.21a, 9.5.3, Policies OS2 and Policy H1).

We note the economic and social facilities referenced (para. 9.5.10) and the economic advantages of the Eynsham-Woodstock sub-area described at para. 9.5.11, specifically the relationship to London-Oxford Airport, Kidlington, Oxford, major employment growth areas to the south of Oxford and the influence of the Oxfordshire knowledge spine. We also note the reference to ‘travel-to-work’ to Oxford and the effect that this has on traffic congestion along key routes including the A40 and A44.

The Modified Plan’s proposals for 650 dwellings on three sites are noted and there is no objection to their inclusion:

- Land east of Woodstock (300 homes)
- Land north of Hill Rise, Woodstock (120 homes)
- Land north of Banbury Road, Woodstock (250 homes)

The reference at para. 5.30c to seek site-specific planning briefs to guide the development of these allocated sites is welcome in the interest of securing high quality design.

A substantial amount of new housing is proposed as part of this allocation. The Council should also undertake a playing pitch strategy to determine what level of new provision is required to support the new housing. Please contact Sport England for assistance.

I support the general thrust of the modification to the local plan. In commenting on the SHLAA consultation in February 2016 I urged WaDC to increase its housing allocations to more closely reflect the SHLAA assessment. I am therefore delighted to see a significant increase in housing allocations for Woodstock. Woodstock desperately needs new housing and the infrastructure that it will generate. Woodstock is amongst the most sustainable of West Oxfordshire service centres as demonstrated by the WODC Settlement Sustainability report. However, I believe that the total housing numbers for Woodstock must take account of land in
Cherwell District Council which may also be zoned for development. It is not realistic (it is unsound) to view the CDC and WaDC proposals in isolation. Woodstock is one community and the District Council boundary does not represent a boundary of local community identity. It is one community and future planning policies must be developed in the light of this reality.

I support the allocation of 670 new homes in Woodstock over the plan period. However, the distribution and location of those homes must be jointly, agreed between WaDC and CDC and in further consultation with the local community. It could mean all 670 homes being built on the Woodstock East site (part within WODC and part within CDC) or the total allocations could be split between the sites identified in both COC’s and WODC’s proposed modifications.

9.29 The site was found by a previous Local Plan Inspector 72 (Appendix 12) to represent a significant incursion into the open countryside to the east of the town. In this instance consideration was given to a potential allocation for 180 dwellings, which would be well-screened by extensive planting belts. However, the Inspector concluded that the size of the development is excessive when measured against the scale of this small, attractive market town73. While it is acknowledged that these conclusions were made more than ten years ago, and in the context of a planning system that operated very differently from the current one, the veracity of the observations remains. Moreover, having regard to the requirements of the current evidentially based plan-making process the Council has failed to provide evidence that is adequate to support allocation of the proposed sites at Woodstock. While the Plan contends that it is reasonable to conclude that residential development in this location represents a sustainable development opportunity it is unclear on what grounds this assumption is based, given that: There is no comprehensive assessment of the heritage assets of the District within the evidence base supporting the Local Plan and the SA process provides no clear and convincing justification for development in this location, considered against all reasonable alternatives. There is a distinct lack of evidence to support the proposed modifications and accordingly they should be deleted from the Local Plan.

The proposed strategic site of Land East of Woodstock in Woodstock and its adjacent proposed Partial Review site in the Cherwell District Council Local Plan consultation running in part concurrently to WODC’s, is under a helicopter flight circuit and jeopardizes operations of London Oxford Airport and therefore also the employment the airport offers which is very significant with some 700-800 jobs provided there.

We agree with the Council that further sustainable development is possible at Woodstock, and this growth will further benefit from measures set out in the County’s adopted Oxford Transport Strategy, including an
Stagecoach therefore supports the identification of the site for the development of 300 dwellings. We concur that the development requirements identified and the nature of constraints and opportunities to allow the District to meet its own growth requirements, and make an appropriate contribution to meeting the City’s growth needs, justify the release of land in this location. In particular, existing bus services connect this site directly to current and committed major employment development at Langford lane, Oxford Airport, Begbroke and Oxford Northern Gateway.

Future proposals set out in the County’s Oxford Transport Strategy, for an outer P+R on the A44 corridor nearby, and the development of a major east-West public transport corridor from Witney via the A4095 and Bladon towards Langford Lane and Oxford Parkway, indicate that this location is anticipated to become still more accessible by sustainable modes, and bus services in particular. Stagecoach has already registered a new half-hourly service 7 from Woodstock, past the site to Longford Lane, Kidlington, Oxford Parkway and the Banbury Road in Oxford, representing a major step in helping to realise this vision, taking effect in early January 2017.

This and future bus service improvements align closely and strongly with the aspirations of Oxford University and Oxford Airport, also point to significant longer term growth in employment in the immediate vicinity within Cherwell District as well as Oxford Northern Gateway further south. Bus services will offer a relevant and attractive choice over personal car use to all these destinations.

The relative attractiveness of the bus as a choice will be further supported by County plans to upgrade the A4260 through Kidlington and the A44 from Bladon to the City as Rapid Transit/bus priority corridors, consultation on which is starting as this consultation closes.

Proportionate contributions should be sought towards measures to facilitate bus priority on the A44 south of the site, that will be identified as part of the County’s Oxford Transport Strategy.

Land East of Woodstock is currently the subject of a planning application (ref: 16/01364/0UT) to which WTC has strongly objected. Through the SA assessment, all the issues identified above for the other two allocations in Woodstock, can be applied to this site, including distance from the centre and proximity to a World Heritage Site.

The site forms part of a larger site which was submitted to WODC under planning application 14/02004/0UT for 1,200 new dwellings (the remainder of the site fell within Cherwell District Council - WODC should be aware that this remainder has been submitted to Cherwell District Council for consideration as an allocation in its Local Plan 2031 Review in order to accommodate some of Oxford’s unmet need).

The application was almost unanimously refused by Councillors in both districts.
ICOMOS UK, which is the official adviser to UNESCO on cultural World Heritage Sites, commented on and objected to the proposal. Its submission of 29 January 2015 stated that the replacement of open farmland with a major development would have a negative impact on the tranquillity of the closest part of the Blenheim Palace estate in terms of traffic and light pollution. A copy of its full response can be found at Annex 4 of this submission. This cannot be disregarded by WODC in allocating the site.

There are however additional complications. This allocation cannot be considered in isolation. Recently an appeal has been allowed in Long Hanborough for 169 dwellings (14/1234/P/OP) with an additional appeal being lodged for 120 dwellings (15/03797/Out) in the same settlement. Houses are also being built in Bladon in the same area. All of these proposals combined, particularly in traffic and pollution terms, would be disastrous for Woodstock. WODC may remember recently when Blenheim hosted 'Countryfile Live' which attracted an extra 120,000 visitors over the four days jamming local roads around Woodstock. The Oxford Mail nicknamed the town "WoodSTUCK". There were similar issues when Blenheim Palace hosted another event in October this year. The A44 suffers from heavy traffic flow, particularly at Woodstock, this is evidenced in the County Council’s Average Daily Traffic Flows Table found at Annex 5 of the submission.

WODC's own assessment of the site in its Strategic Housing Land Availability Assessment (SHLAA) 2014 recommend only 150-180 on the site. This has now risen to an allocation of 300. WTC considers that this is an overdevelopment of the site and goes against what WODC originally thought appropriate for the site.

This site too was considered during the preparation of the current adopted Local Plan 2011 but was again rejected over highway concerns and impacts on local amenity. Indeed the Inspector in his 2004 report stated that:

"The proposal would constitute a significant incursion into the open countryside to the east of the town. I also consider that the size of the proposed development is excessive when measured against the scale of this small, attractive market town."

We strongly object to the proposed housing development to the land east of Woodstock. Woodstock does not have the capacity for 300 more houses. The small town is already heavily congested with traffic, with heavy goods lorries, coaches etc. It is a job to get on to the A44.

We are also plagued with Oxford London Airport, which are flying all sorts of aircraft which is becoming busier and noisier than ever. Not to mention the air pollution caused by the diesel oil used by the fixed-wing airport. We have had first-hand experience of being badly affected by the noise nuisance. The helicopter and fixed-wing aircraft fly so close to our garden and over our house. We have made constant complaints. The big planes are extremely noisy when their engines rev-up. They are jets and heavy-sized aircraft and it is only going to get worse over time.
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<td>wing aircraft fly so close to our garden and over our house. We have made constant complaints. The big plans are extremely noisy when their engine revs-up. They are jets and heavy-sized aircraft and it is only going to get worse over time.</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1089</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 163</td>
<td>We strongly object to the proposed housing development to the land east of Woodstock. Woodstock does not have the capacity for 300 more houses. The small town is already heavily-congested with traffic with heavy goods lorries, coaches etc. It is a job to get onto the A44. We are also plagued with Oxford London Airport, which are flying all sorts of aircraft, which is becoming busier and noisier than ever. Not to mention the air pollution caused by the diesel oil used by the fixed-wing aircraft. We do not know how one could consider building houses so near to the airport. We have had first-hand experience of being badly affected by the noise nuisance. The helicopter and fixed-wing aircraft fly so close to our garden and over our house. We have made constant complaints. The big planes are extremely noisy when their engines rev-up. They are jets and heavy-sized aircraft and it is only going to get worse over time.</td>
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<td>MM456</td>
<td>Sport England</td>
<td>Raymond Cole</td>
<td>Mr</td>
<td>Cole</td>
<td>1125</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 163</td>
<td>Historic England has no comments on the principle of the allocation of Land East of Woodstock but we welcome and support criterion b) regarding the Blenheim Palace World Heritage Site. A substantial amount of new housing is proposed as part of these allocations. The Council should also undertake a playing pitch strategy to determine what level of new outdoor and indoor sports provision is required to support the new housing. Please contact Sport England for assistance.</td>
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<td>MM623</td>
<td>Woodstock Town Council</td>
<td>Colin Carritt</td>
<td>Mr</td>
<td>Carritt</td>
<td>1416</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 163</td>
<td>I support the general thrust of the modification to the local plan. In commenting on the SHLAA consultation in February 2016 I urged WaDC to increase its housing allocations to more closely reflect the SHLAA assessment. I am therefore delighted to see a significant increase in housing allocations for Woodstock. Woodstock desperately needs new housing and the infrastructure that it will generate. Woodstock is amongst the most sustainable of West Oxfordshire service centres as demonstrated by the WODC Settlement Sustainability report. However, I believe that the total housing numbers for Woodstock must take account of land in Cherwell District Council which may also be zoned for development. It is not realistic (it is unsound) to view the CDC and WaDC proposals in isolation. Woodstock is one community and the District Council boundary does not represent a boundary of local community identity. It is one community and future planning policies must be developed in the light of this reality. I support the allocation of 670 new homes in Woodstock over the plan period. However, the distribution and location of those homes must be jointly, agreed between WaDC and CDC and in further consultation with the local community. It could mean all 670 homes being built on the Woodstock East site (part within WODC and part within CDC) or the total allocations could be split between the sites identified in both COC’s and WODC’s proposed modifications.</td>
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<td>Neilson</td>
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<td>3) Policy EW1c – Woodstock East</td>
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Policy EW1c: We support the allocation of land at Woodstock East for around 300 homes.

A requirement to ensure no harm to heritage assets is in direct conflict with national policy, which establishes in Chapter 12 of the Framework that less than substantial harm to a heritage asset should be weighed against public benefits arising.

Woodstock East is a sustainable site in a sustainable location. Its development will contribute towards the sustainable growth of Woodstock and provide for much needed housing in the area. The development of the site for housing has previously been supported by West Oxfordshire District Council. A previous SHLAA recommended its inclusion in the Local Plan as a housing allocation.

Together with other sites allocated for development around Woodstock, the development of this site will make a major contribution towards the improvement and enhancement of local infrastructure and result in significant social, economic and environmental benefits.

The site is readily available and there are no significant constraints to development. Consequently, it will be delivered during the Plan period. Furthermore, there is an opportunity for the sites allocated around Woodstock to be linked together, as they are all in one ownership. This presents the opportunity to deliver a joined up approach to the delivery of infrastructure and services, to further enhance the long term sustainability of the settlement.

The land around Woodstock is owned by Blenheim Estates. Blenheim is an integral part of Woodstock and has been for many Centuries. Blenheim Estates adopts a multi-generational approach to all of its land and property – as can be seen by the exceptional land management and the sensitive Blenheim Estates developments throughout the area.

This is a fundamental point. This site, together with others around Woodstock, can be brought forward in a manner which ensures associated investment into all of the things that make a place sustainable. It is in Blenheim Estates direct interest (and forms the reason for its existence) to invest into Woodstock. The success of Woodstock and that of Blenheim are intertwined.

Blenheim Estates is well placed to ensure that development will be brought forward to enhance the sustainability of Woodstock as a whole. Piecemeal development will be avoided and the combined development of the allocated sites will result in major investment into local infrastructure, facilities and services. For example, a 200 house development could only make a contribution to education, whereas, together, the delivery of say, 770 dwellings, can ensure the provision of a new primary school. This approach can be adopted to all manner of things and given that Blenheim Estates has other strategic landholdings within Woodstock, the allocations can help to release associated opportunities – for example, new community facilities in the town centre and new community facilities for the historic, but threatened,
Woodstock Football Club.

Blenheim Estates has many years of experience as a progressive landlord and intends to become a significant provider of affordable housing. This, combined with the Blenheim Estates' record as a provider of developments of the highest design quality and exceptional property management, will help to ensure that the land allocations support a long term legacy, enabling people of all backgrounds to enjoy the unique characteristics of the area.

There are too many examples across the country of where housing developments fail to provide the comprehensive investment into services, facilities and infrastructure necessary to ensure sustainability. The land allocations at Woodstock provide an exciting opportunity to place sustainable development at the heart of the planning process. They are to be welcomed.

### Ecology and Natural Environment

In all cases reference should be made to the District Council's ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

Woodstock – Land East of Woodstock

The adjacent Sustrans route is noted. There would appear to be significant opportunities for sustainable travel options from this site.

The Blenheim World Heritage Site, SSSIs, Conservation Target Areas are all situated nearby. There are likely to be impacts on populations of farmland birds.

There are likely to be increased recreational demands on Old Woodstock Line nature reserve and Woodstock Water meadows – both outside the site. Additional investment from the site is required to ensure the future resilience of these recreational and wildlife sites.

### Policy EW1c (following 9.5.41k)

d) provision of satisfactory vehicular access onto the A44 Woodstock Road and appropriate pedestrian and cycle connections.

We suggest the following changes to ensure this policy is in line with LTP4. Suggested text to replace point 'd):

- provision of satisfactory vehicular access, provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians, and cyclists with links to key destinations including integrating with Woodstock, Hanborough Station and Oxford Parkway Station. Provision of individual Travel Plan (and associated Travel Information Packs) for the residential and employment areas.
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<tr>
<td>MM100</td>
<td></td>
<td>Sharone Parnes</td>
<td>Mr</td>
<td>Parnes</td>
<td>260</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 163</td>
<td>The County Council has experienced significant difficulties in securing appropriate mitigation measures for the impact of strategic development areas where portions of the site have come forward as separate planning applications. To help reduce the occurrence of this issue we propose this additional text: The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.</td>
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<tr>
<td>MM424</td>
<td>Natural England</td>
<td>Marc Turner</td>
<td>Mr</td>
<td>Turner</td>
<td>947</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 163</td>
<td>The sustainability appraisal for Woodstock, particularly in regard to the local economy and retail situation is vastly outdated and should have been refreshed in time for the proposed modifications which in themselves are grossly overdue and presented at the 11th hour. The vast increase in dwellings around the town has been accompanied by a huge reduction in retail space. WODC's proposed strategic sites for Woodstock do not account for two large further proposed sites that concurrently appear in the Partial Review consultation of Cherwell District Council's Local Plan - the CDC sites are on the boundary with Woodstock, one over the Shipton Road from the &quot;Land East of Woodstock&quot; site and the other forming an immediate adjacent extension of the &quot;Land East of Woodstock&quot; site. It is misleading and unreasonable not to include consideration of the ramifications especially as WODC and CDC are cooperating in discussions on the strategic sites on respective sites near their boundary in Woodstock. All the three WODC strategic sites in Woodstock and the two CDC partial review sites are owned by the same landlord and form a ring or arch of new-build sites which turn the town into an enclave surrounded by estates on land by a single landowner which raises deep concerns about the potential influence on local government, economy, and other issues. It is unclear why any single landowner should be permitted to effectively monopolize all the proposed strategic sites in this way.</td>
</tr>
<tr>
<td>MM456</td>
<td>Sport England</td>
<td>Raymond Cole</td>
<td>Mr</td>
<td>Cole</td>
<td>1128</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 164</td>
<td>The proposed allocation may result in the loss of a playing field which should be protected and this should land should be removed from the allocation or replaced within the site. The Council should also undertake a playing pitch strategy to determine what level of new provision is required to support the new housing.</td>
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| MM623        | Woodstock Town Council  | Colin Carritt  | Mr               | Carritt            | 1417       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 164 | I support the general thrust of the modification to the local plan. In commenting on the SHLAA consultation in February 2016 I urged WaDC to increase its housing allocations to more closely reflect the SHLAA assessment. I am therefore delighted to see a significant increase in housing allocations for Woodstock. Woodstock desperately needs new housing and the infrastructure that it will generate. Woodstock is amongst the most sustainable of West Oxfordshire service centres as demonstrated by the WODC Settlement Sustainability report. However, I believe that the total housing numbers for Woodstock must take account of land in Cherwell District Council which may also be zoned for development. It is not realistic (it is unsound) to view the CDC and WaDC proposals in isolation. Woodstock is one community and the District Council boundary does not represent a boundary of local community identity. It is one community and future planning policies
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<td>Crest Strategic Projects</td>
<td>Crest Strategic Projects</td>
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<td>Crest Strategic Projects</td>
<td>1597</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 164</td>
<td>must be developed in the light of this reality. I support the allocation of 670 new homes in Woodstock over the plan period. However, the distribution and location of those homes must be jointly, agreed between WaDC and CDC and in further consultation with the local community. It could mean all 670 homes being built on the Woodstock East site (part within WODC and part within CDC) or the total allocations could be split between the sites identified in both COC's and WODC's proposed modifications.</td>
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<td>MM763</td>
<td>W &amp; R Hutton</td>
<td>Unknown Hutton</td>
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<td>1983</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 164</td>
<td>Our client supports the Council’s position that smaller ‘non-strategic’ allocations can help to ensure a deliverable housing supply in the short-term. Accordingly 15 ‘non-strategic’ sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings. Of these, land north of Hill Rise, Woodstock has been identified as a proposed allocation for the provision of 120 dwellings. Our Client supports the allocation of land within Woodstock which is identified as a Rural Service Centre and therefore, is one of the most sustainable settlements within the District. The content of paragraph 9.5.41q (MM 164) identifies that there are landscape sensitivities which relate to the site and that any scheme would need to incorporate landscape mitigation measures. In this regard it is noted that the proposed allocation identified in MM 165 does not follow any natural boundaries but follows an arbitrary line within a larger field. To minimise the landscape impact of the development the boundaries of the allocation should be extended to the natural boundary line therefore ensuring that maximum screening can be achieved. Furthermore, our Client owns land in the vicinity which could be used to provide additional landscaping and/or open space to maximise the development potential of the allocated site.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2264</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 164</td>
<td>9.5.41m The site is primarily within agricultural use with the exception of a small parcel of land in the southern part of the site which is in use as a children’s play area. Notably, relocation of this play area would provide the opportunity to create a vehicular access into the site from Vermont Drive/Vanbrugh Close as well as improving a more modern play facility for local children. Depending on the scale of development there may also be scope to provide a vehicular access directly onto the A44 to the north of the existing houses at Hill Rise.</td>
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<tr>
<td>MM307</td>
<td>Philip Brunt</td>
<td>Mr Brunt</td>
<td></td>
<td></td>
<td>530</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 164</td>
<td>1. The existing Barn Piece estate has 112 houses, and the proposed new development would more than double that development, making Old Woodstock a much more crowded area, taken together with Hill Rise and Manor Road (a further 170 existing houses). 2. Old Woodstock has no infrastructure (no shops, no schools or doctors etc) and the proposed site is approximately one mile from the town of Woodstock, accessed only by the busy A44. 3. Footpaths bordering the A44 between Old Woodstock and Woodstock town are narrow, and pedestrians, including mothers with pushchairs, often seem at risk from heavy vehicles and fast moving traffic. Pedestrian and vehicular traffic from the proposed new development would increase safety concerns considerably.</td>
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4. The primary school is already over-subscribed, and children from the new development would be unlikely to find places there, resulting in car journeys to other towns and villages. The Marlborough School is almost 2 miles from the proposed site, approached only by the A44 and the town centre.

4. These aspects alone – lack of infrastructure, limited safe access to the town and overcrowding of the area - make this site unsuitable for a development of this size.

6. The proposed access to the new development is via Vermont Drive is also the only access to the existing Barn Piece estate, and a bus route and terminus. It is a residential road, about 100 yards long and 17 feet wide.

There are 10 buses a day (8 on Sunday) which reverse at the junction with Rosamund Drive, and wait in Vermont Drive for an average of 6-7 minutes each. At the time of bus visits, one way traffic only is possible in Vermont Drive, and HGVs passing the bus have to use the pavement. Vans, lorries, coaches and cars often use the Rosamund Drive and Vermont Drive junction to reverse and turn back towards the town. At busy times, when residents are leaving for work or returning home, Vermont Drive and this junction already cannot cope with existing levels of traffic.

7. Vermont Drive is too narrow to support both existing traffic and the extra traffic the proposed development would bring.

7. The suggestion that another access to the proposed site could be made from the A44 north of Hill Rise seems impractical. The A44 is too narrow to allow for right turning traffic in a 50mph limit, and major alterations to Hill Rise would be necessary to arrange an opening from the very narrow service road there.

8. The children’s play area at the end of Rosamund Drive, now intended for closure to give access to the new development, has a special significance for Old Woodstock residents, and will be a tragic loss. In 2013 it was saved from closure when Blenheim Estates purchased the field, following strong local protest and newspaper coverage. It seems unlikely that the play area, together with its associated half-sized football pitch for children, can be re-located within the new development so as to be as accessible and popular as it is now.

8. Above all, the new development would remove a piece of countryside, with a town to town public footpath running through it, which has become important to all local people, particularly those with houses bordering the field. The footpaths along three sides of the field have been used by local families for decades, as shown by a recent Town Council survey identifying well used local paths. The loss of countryside to Old Woodstock would be significant and intrusive.
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<td>MM763</td>
<td>W &amp; R Hutton</td>
<td>Unknown</td>
<td>Hutton</td>
<td>1984</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 165</td>
<td>Our client supports the Council's position that smaller 'non-strategic' allocations can help to ensure a deliverable housing supply in the short-term. Accordingly 15 'non-strategic' sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings. Of these, land north of Hill Rise, Woodstock has been identified as a proposed allocation for the provision of 120 dwellings. Our Client supports the allocation of land within Woodstock which is identified as a Rural Service Centre and therefore, is one of the most sustainable settlements within the District. The content of paragraph 9.5.41q (MM 164) identifies that there are landscape sensitivities which relate to the site and that any scheme would need to incorporate landscape mitigation measures. In this regard it is noted that the proposed allocation identified in MM 165 does not follow any natural boundaries but follows an arbitrary line within a larger field. To minimise the landscape impact of the development the boundaries of the allocation should be extended to the natural boundary line therefore ensuring that maximum screening can be achieved. Furthermore, our Client owns land in the vicinity which could be used to provide additional landscaping and/ or open space to maximise the development potential of the allocated site.</td>
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| MM376         | Stagecoach in Oxfordshire/Stagecoach West | Nick Small, Stagecoach Bus | Dr Small | 1017 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | MAIN 166 POLICY EW1d Land North of Hill Rise, Woodstock (120 dwellings) Stagecoach recognises and agrees with the Council that this site is relatively very sustainable. It is served by up to three buses per hour on service S3, running directly via the A44 to Oxford (including Oxford Station) and passing through the major employment proposed at Oxford Northern Gateway. One bus/hour currently terminated by making a reversing manoeuvre at Vermont Drive. This arrangement is far from ideal. Stagecoach would observe that the proposed access arrangements should have regard to facilitating terminating bus services, in order to plan for the best possible future bus service to the site, and one that is not prejudiced by potential conflicts with higher traffic flows once this site is implemented. Such arrangements could take the form of a purpose-designed turning loop, or a roundabout junction at one of the main accesses to the site. While Stagecoach broadly supports the Policy, it is not entirely in conformity with NPPF para. 17 and paras. 29-32, and is therefore unsound as no provision is made to resolve the issues of buses terminating at/near the entrance of the site. This can be resolved simply by amending the draft policy as follows: "c) provision of satisfactory vehicular accesses and appropriate pedestrian and cycle connections including appropriate accommodation of the existing public right of way through the site, and provision of a safe and efficient means for bus services to terminate and turn at the site in forward gear."

| MM448         | Woodstock Town Council | Woodstock Town Council | Mrs Grant | 1040 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock | WTC notes that of the three sites allocated in the Woodstock, only one was deemed worthy of assessment in the WODC’s original Strategic Housing Land Availability Assessment (SHLAA) in 2014. Land North of Hill Rise is one of the sites not assessed in the original SHLAA. |
WODC has now published a Sustainability Appraisal (SA) alongside the draft Plan to assess sites against a number of sustainability objectives. WTC disputes a number of points raised in the SA. WTC had expected an updated SHLAA to be published at the same time as this consultation to show greater detail on how sites were assessed.

SA Objective 6 is to "improve accessibility to all services and facilities". The SA states that Land North of Hill Rise is in close proximity to the town centre. WTC does not concur with this view. The Government’s 'Manual for Streets Guidance' states that 10 minutes' (up to about 800m) is about right for a walkable neighbourhood. In addition, the guidance states that people are more likely to walk if the route is a pleasant one. WODC must consider whether this is achievable from the site as currently the walk into town from the site is indeed very unpleasant and dangerous involving a number of hazardous road crossings. The path is also very narrow in places, bringing pedestrians into close proximity with HGVs and resultant air pollution. This is particularly unsuitable for the elderly and mothers with push chairs.

In reality, the site is nearly 1 kilometre from the centre meaning people will most likely drive to the centre to shop. Bringing more traffic and pollution into the already congested town centre is clearly untenable. The shortage of parking in the centre cannot be overstressed. This is evident in WODC's own parking report (an extract of which can be found at Annex 3 of this submission).

SA Objective 7 seeks to "improve the efficiency of land use". Land North of Hill Rise is a greenfield site but according to the SA, its development will only be a "minor negative". The permanent loss of greenfield land cannot be seen as an efficient use of land so should be considered a "major negative."

SA Objective 10 seeks to address the causes of climate change and reduce greenhouse gas emissions. As with SA Objective 6 above the SA states that as the site is in close proximity to the town centre, emissions will be reduced as a result of fewer car journeys. As identified above, this is clearly not the case as the distance of the site from the centre will result in more car journeys and increased emissions. Therefore the site should be marked down heavily against this Objective.

SA Objective 11 seeks to protect and improve soil and water resources. Again the site’s development is only seen as a "minor negative". The development of a greenfield site will not protect and improve soil so its allocation should be viewed as a "major negative".

Finally, SA Objective 14 seeks to "Conserve and enhance landscape character and the historic environment". The SA states that the site has not been assessed through a recent landscape assessment. The site is on the furthest edge of a nationally and internationally important historic town. WTC cannot understand how a site, in this location, can be allocated without even a landscape assessment.

Moreover, the SA explains that the site sits within close proximity to the Blenheim Palace World Heritage Site, a Registered Park and Garden and a Conservation Area. It then states:

"Overall, it is considered that there is potential for a residual neutral effect with an element of uncertainty until site level assessments have been completed”.

Once again, WTC cannot see how a site can be allocated when WODC is not in possession of all the facts. This is particularly important here where there is potential for negative impacts on a World Heritage Site.

WTC wishes to remind WODC that access to the A44 from this site is extremely difficult and to confirm that it will resist the loss of the playground on the site.
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1090</td>
<td>&gt; SECTION 9 &gt; STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>Incidentally, and quite tellingly, this site was considered during the preparation of the current adopted Local Plan 2011 but was rejected over highway concerns and impacts on local amenity. Historic England has no comments on the principle of the allocation of the Land north of Hill Rise but we welcome and support criterion b) regarding the setting of the Blenheim Palace World Heritage Site.</td>
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<tr>
<td>MM458</td>
<td>Barbara Strongitharm</td>
<td>-</td>
<td>Strongitharm</td>
<td></td>
<td>1130</td>
<td>&gt; SECTION 9 &gt; STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>Further to my comments dated 20 December 2016 (copy attached), may I draw your attention to the following: With regard to the only access into Old Woodstock Barn Piece Estate via the residential road of Vermont Drive, as from 3 JANUARY 2017 there is an additional usage of this access route. A daily, 30 minute public transport service (Stagecoach No. 7) is also now using Vermont Drive as its terminus/turn-around point into Oxford. This extra service is, of course, most welcome news to all Old Woodstock residents who use public transport but the above proposed future development of 120 houses, creating numerous additional vehicles, would lead to problems within this access area. I would be grateful if this comment could be noted as a new and further reason against the proposal. Notification of an OBJECTION to the proposed development in the WEST OXFORDSIDRE LOCAL PLAN 2031 of ‘LAND NORTH EAST OF HILL RISE’ Old Woodstock is a small and solely housing based Community. It does not have a school, surgery or shop. The proposed plan for 120 houses on land north east of Hill Rise (which would increase the size of the Old Woodstock Community by 50%) does not appear to make provision for resolving the problem of the non-existence of any infrastructure here in the Old Woodstock Community. Demand on the current Woodstock infrastructure is already stretched. [Examples of this: I understand that Woodstock Primary School has filled its capacity; and also personal experience of an 8 day wait for a G.P. appointment.] The only facility provided for Old Woodstock residents is the recreation ground. All of the equipment is well used (swings, slide, etc.) by local children - and by my own young grandchildren. On the same site is a small-sized football pitch which is very much enjoyed by both young and old alike (using as an illustration, a 6 year old boy and myself - his 77 year old grandmother!) The picnic table and bench seats are also much appreciated - allowing for an opportunity to just relax and admire the beautiful countryside view. This safe and easily accessed area would be greatly missed by all ages of the Old Woodstock Community.</td>
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| MM468        |                         | Joseph Shaw    | -                | 1169       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock | Proposed development on 'Land north of Hill Rise'  
As a resident of Old Woodstock, I wish to register an objection to the proposed development on 'Land north of Hill Rise'.  
As far as I can see from the plans, access to this development, to include 120 new houses, will be through the only access into Old Woodstock Barn Piece Estate is via a residential road (Vermont Drive).  
This is a route already heavily used, not only by private and commercial vehicles, but by public transport (i.e. the S3 and, latterly, the 500: both buses use Vermont Drive as a turn-around). Speaking only from the viewpoint of a passenger, it also appears to be a difficult and dangerous junction at which to either turn off or onto the A44.  
An additional 120 houses would increase the volume of vehicles by at least 240 - an estimate based upon the fact that these days most people own a vehicle: 2 residents = 2 vehicles. However, noting the current trend, this number could be higher - even for a house with 2 residents. (Two terraced houses in Westland Way both with 2 occupants, have 3 vehicles per household.)  
There is an existing parking problem in Old Woodstock. Westland Way, with its open green space, is a favoured parking site for visitors who then access Blenheim Park on foot through the public routes off the Manor Road section of the A44.  
The additional vehicles resulting from 120 new houses would only exacerbate the problem of both parking and the volume of traffic using the extremely busy and dangerous A44.  
As a non-driver, I walk into Woodstock via the narrow A44 footpaths. The combination of the size and, possibly, excessive speed of the many RGVs constantly using the A44 (Plus the high volume of private vehicles) is, to say the least, very stressful.  
I would be very interested to know how the statement that the A44 has "... effective pedestrian and cycle links to the centre of Woodstock" was able to be made ...Was the route actually travelled by a pedestrian and a cyclist on a test basis?  
As a regular pedestrian user of this route into Woodstock, I fail to recognize any "... effective pedestrian and cycle links to the centre of Woodstock". As a pedestrian, I would welcome a 20mph speed limit on the entire section of the A44 from Old Woodstock and all through the town itself as - it is a safety hazard.  
My description of the A44 as "a safety hazard" is based upon fact: On 15 February 2016 the A44 through Woodstock was closed in both directions after an accident occurred on a narrow section of pavement between a motor vehicle and a pedestrian. (The reason I am aware of the date is that particular morning my son and his family had been due to pick me up to go on holiday with them and were consequently delayed.)  
Even one such accident is one too many.  
At my age, by 2031, I could well be dead; but these comments/observations might perhaps benefit other members of the Old Woodstock Community from being adversely affected by the proposed 'DEVELOPMENT OF LAND NORTH EAST OF HILL RISE'.  
I sincerely trust that the above views will be taken into consideration when any future decisions are made regarding the WEST OXFORDSHIRE LOCAL PLAN 2031.
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<tr>
<td>MM54</td>
<td></td>
<td>Christine Zwart</td>
<td>Mrs</td>
<td>Zwart</td>
<td>119</td>
<td>Sub Area &gt; MAIN 166</td>
<td>I write to object strongly to the proposed development to the north of Hill rise in Old Woodstock. I live in Old Woodstock and despite the fact that this is the oldest part of the town we are totally lacking in amenities and infrastructure. Despite a dangerous road, the footpath into town is so narrow that you cannot safely take a pushchair or wheelchair down the hill. When our grandchildren come to visit we have to walk in single file and within inches of cars and lorries. All this makes for a lack of community in this area because we have nowhere to meet. The very second rate playground and the field where these proposed houses could be built are the only communal areas for children and dog walkers. If we lose these we shall have nothing at all! Even if the playground is eventually rebuilt and the path reinstated they will be out of action for some time. We live on the A44 and the traffic is already noisy and dangerous and constantly exceeds the speed limit. Indeed our beloved dog was run over outside our house last year. If you add to the present traffic problems more cars from the proposed new houses plus construction vehicles life is really going to become unbearable for us. I understand that pollution problems on the A44 may already exceed EU limits. My husband's asthma has certainly got worse of late. The field in question is one of the delights of Old Woodstock. Someone has taken the trouble to plant the sides of the footpath with hollyhocks and when they are in bloom the walk to Wootton provides a marvellous respite from the noise of the road which we live with day and night. We are already a much neglected area of the town. PLEASE don't grant planning permission to these 120 houses.</td>
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| MM474         |                         | Richard Soanes  | Mr               | Soanes            | 1193       | Sub Area > MAIN 166 | I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:  
  • Old Woodstock has no infrastructure (shops, school, doctors etc.) which means all residents have to travel into town on the busy A44 for everyday hings. This is not the case for other sites in Woodstock.  
  • Would cause significantly more traffic continuing the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, |
Kidlington, Eynsham. This is not the case for other sites in Woodstock.

- Existing parking problems in Woodstock would be made much worse as many Residents will drive into Woodstock due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.

- Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, "effective pedestrian and cycle links to the centre of Woodstock". Those living here know this to absolutely NOT be the case. Old Woodstock just can't take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

- Old Woodstock already has a problem with schooling: Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake = only 105 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.

- Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

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- Vermont drive is too narrow to support new and existing traffic.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it
cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

Notification of an OBJECTION to the proposed development in the WEST OXFORDSHIRE LOCAL PLAN 2031 of 'LAND NORTH EAST OF HILL RISE'

Old Woodstock is a small and solely housing based Community. It does not have a school, surgery or shop.

The proposed plan for 120 houses on land north east of Hill Rise (which would increase the size of the Old Woodstock Community by 50%) does not appear to make provision for resolving the problem of the non-existence of any infrastructure here in the Old Woodstock Community.

Demand on the current Woodstock infrastructure is already stretched. [Examples of this: I understand that Woodstock Primary School has filled its capacity; and also personal experience of an 8 day wait for a G.P. appointment.]

The only facility provided for Old Woodstock residents is the recreation ground. All of the equipment is well used (swings, slide, etc.) by local children - and by my own young grandchildren.

On the same site is a small-sized football pitch which is very much enjoyed by both young and old alike (using as an illustration, a 6 year old boy and myself - his 77 year old grandmother!) The picnic table and bench seats are also much appreciated - allowing for an opportunity to just relax and admire the beautiful countryside view. This safe and easily accessed area would be greatly missed by all ages of the Old Woodstock Community.

The only access into Old Woodstock Barn Piece Estate is via a residential road (Vermont Drive). This is a route already heavily used, not only by private and commercial vehicles, but by public transport (i.e. the S3 and, latterly, the 500: both buses use Vermont Drive as a turn-around).

Speaking only from the viewpoint of a passenger, it also appears to be a difficult and dangerous junction at which to either turn off or onto the A44.

An additional 120 houses would increase the volume of vehicles by at least 240 - an estimate based upon the fact that these days most people own a vehicle: 2 residents = 2 vehicles. However, noting the current trend, this number could be higher - even for a house with 2 residents. (Two terraced houses in Westland Way both with 2 occupants, have J. vehicles per household.)

There is an existing parking problem in Old Woodstock. Westland Way, with its open green space, is a favoured parking site for visitors who then access Blenheim Park on foot through the public routes off the Manor Road section of the A44.

The additional vehicles resulting from 120 new houses would only exacerbate the problem of both parking and the volume of traffic using the extremely busy and dangerous A44.

As a non-driver/...
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<tr>
<td>MM486</td>
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<td>S J Ward</td>
<td>Mrs Ward</td>
<td>1211</td>
<td>Development of Land Northeast of Hill Rise</td>
<td>I believe that the above proposal is totally unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons: The increase of 120 homes would further increase traffic driving along the now very busy Manor Road (A44), especially at peak times. As a mother of two, we walk to Woodstock Primary most days and have to be very careful walking on the narrow path. HGV rush pass very close to the edge of the path. I have witnessed a couple of times, 2 vehicles passing in opposite directions clipping their wing mirrors, as Manor Road (A44) is quite narrow in some places. When our children were younger, it wasn’t safe for them to walk alongside a pushchair, so I had to drive into Woodstock. Parking in Woodstock would increase for young families and the elderly, who would have to drive into Woodstock for essentials, i.e. doctors' surgery, shops, post office, dentist, optician. The A44 has an emergency vehicle at least once a day. One morning recently, when walking with our children to school, we had to stop and step back as an HGV mounted the path, while pulling over for an emergency.</td>
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As a non-driver, I walk into Woodstock via the narrow A44 footpaths. The combination of the size and, possibly, excessive speed of the many HGVs constantly using the A44 (plus the high volume of private vehicles) is, to say the least, very stressful.

I would be very interested to know how the statement that the A44 has "...effective pedestrian and cycle links to the centre of Woodstock" was able to be made ...

Was the route actually travelled by a pedestrian and a cyclist on a test basis?

As a regular pedestrian user of this route into Woodstock, I fail to recognize any "... effective pedestrian and cycle links to the centre of Woodstock".

As a pedestrian, I would welcome a 20mph speed limit on the entire section of the A44 from Old Woodstock and all through the town itself as - it is a safety hazard.

My description of the A44 as "a safety hazard" is based upon fact: On 15 February 2016 the A44 through Woodstock was closed in both directions after an accident occurred on a narrow section of pavement between a motor vehicle and a pedestrian. (The reason I am aware of the date is that particular morning my son and his family had been due to pick me up to go on holiday with them and were consequently delayed.) Even one such accident is one too many.

At my age, by 2031, I could well be dead; but these comments/observations might perhaps benefit other members of the Old Woodstock Community from being adversely affected by the proposed 'DEVELOPMENT OF LAND NORTH EAST OF HILL RISE'.

I sincerely trust that the above views will be taken into consideration when any future decisions are made regarding the WEST OXFORDSHIRE LOCAL PLAN 2031.
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<td>MM487</td>
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<td>Peter Ayres</td>
<td>Professor</td>
<td>Ayres</td>
<td>1213</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>Vehicle. (This was at the same spot, where I mentioned previously regarding the clipped wing mirrors). Life in Old Woodstock, is a delight, except for the main road, and we have a very strong community. I feel this will be destroyed if the large open green space was replaced by a housing development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.</td>
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<td>MM519</td>
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<td>Paul Mckintosh</td>
<td>-</td>
<td>Mckintosh</td>
<td>1268</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>It was very useful to meet you on Wednesday 14th at the Woodstock Community Centre. Thank you for your help. After considering the proposals set out, I believe that the land Northeast of Hill Rise, Woodstock, is the wrong place for new housing and should not be included in the West Oxfordshire Local Plan. General objection. Few of the extra population would be employed in Woodstock, most would travel to work in Witney, Oxford, or destinations beyond Oxford. All of these journeys would be through Woodstock, and past Blenheim Palace. Specific objections: access to Woodstock The plans + modifications do not provide satisfactory access to Woodstock (schools, surgery, shops etc.) For pedestrians, particularly parents with children in pushchairs, schoolchildren, the elderly, and the disabled, the walk from the Hill Rise area into Woodstock is hazardous and frightening. In the area of Manor Road, the kerb-kerb width of the A44 is insufficient to allow lorries of legal maximum width to pass each other. Wing mirrors frequently overhang the very narrow pavements in a way potentially lethal to pedestrians. As an additional hazard, the pavements are often obstructed by refuse bins on days when household waste is collected (the bins blow onto the road on stormy days). Between Manor Road and the Black Prince pub, the pavements are slightly wider but pedestrians are confined by high and crumbling walls on both sides of the road. Near the Black Prince pedestrians are protected only by a flimsy barrier from the many heavy lorries, buses, etc., which use this trunk road - some travelling downhill at well in excess of the legal speed limit. Both human health and the environment benefit when people of all ages walk, or cycle, rather than use a car for short journeys. The situation of Old Woodstock does not encourage such activities. Any new footpath and cycle way into Woodstock would have to cross not only the river Glyme but also a wide stretch of water meadows. For safety reasons, it would have to be very well lit, thereby introducing light pollution to an environmentally sensitive area. Finally, if the proposed new development and the existing housing in Rosamund Drive, Vanbrugh Close, etc., were to share a single exit/entry point to the A44 via Vermont Drive, a potentially hazardous situation arises in the case of an emergency. If there is to be extra housing, a second exit onto the A44 is needed, probably requiring the expensive construction of a roundabout on the A44 in the Hill Rise area. I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons: Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel</td>
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| MM521         |                         | Vivienne Insley | -                | Insley            | 1270       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:  
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<tr>
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<td>Mrs B Davey</td>
<td></td>
<td>1273</td>
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<td>Andrew Sussums</td>
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<td>Sussums</td>
<td>1277</td>
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| MM531         |                         | J Trinder       | -                | Trinder           | 1280       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | • Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.  
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| MM532         |                         | S R Scott      |                  | Scott             | 1281       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:  
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<td>William Robert Edwards</td>
<td>Dr Edwards</td>
<td>1283</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>This contravenes the needs of the existing residents of Woodstock. The expansion of Woodstock should be limited to 300 dwellings. EWD. A44 at Old Woodstock and its footways are well below the safe width for a green signed road.</td>
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<td>Kelley Wake</td>
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<td>Mr M J Giles</td>
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<td>Young</td>
<td>1292</td>
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LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166

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- Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

- Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

- Vermont drive is too narrow to support new and existing traffic.
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| MM545         |                        | Mrs J M Giles   | Mrs              | Giles             | 1296       | > SECTION 9 > STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development. I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:  
  • Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.  
  • Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock.  
  • Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.  
  • Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, ‘effective pedestrian and cycle links to the centre of Woodstock’. Those living here know this to absolutely NOT be the case. Old Woodstock just can’t take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.  
  • Old Woodstock already has a problem with schooling- Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake = only 105 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.  
  • Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.  
  • We could lose the use of the play area and football pitch for at the least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.  
  • Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.  
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| MM548         |                         | M Dalton       | -                | Dalton            | 1299       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | • Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.  
• Vermont drive is too narrow to support new and existing traffic.  

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development. |
| MM549         |                         | Andrew Hill    | -                | Hill              | 1300       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I wish to object to the ill conceived development plans proposed for the land north east of Hill Rise, due to the following reasons:  
• The area behind my house would become considerably noisier and busier.  
• The views to the rear of Hill Rise, which are genuinely beautiful would be lost forever, and I would lose my current right to quiet enjoyment of the space behind my house.  
• The high volume and type of traffic on the A44 is currently known by councils at county, district and local levels, with well in excess of 10000 vehicles using the A44 per day, many of them articulated lorries. A significant increase in traffic would occur through Woodstock on the A44 should the development to the north east of Hill Rise be permitted, and with it conscious knowledge of the attendant increase in risk to pedestrians, particularly along the narrow sections of pavement opposite the Black Prince pub.  
• Vermont Drive is patently too small to take the increase in traffic.  
• I believe that there would be increased noise and loss of privacy to all residents at the rear of Hill Rise.  
• The area to the north east of Woodstock is green belt land, and not an 'infill', another reason making this unsuitable  
• Pollution would increase, potentially well past permissible levels.  
• Old Woodstock has no infrastructure or services, and so all residents must travel into Woodstock itself. Additionally, 80%+ of all commuters head Oxford bound, meaning that traffic through Woodstock would increase if the development were permitted north east of Hill Rise.  
• I understand that local schooling is already at full capacity, with local children now not being able to get into local schools. |
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| MM550         |                         | Eliza Cox       | Ms Cox           | 1301       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | • I know that Woodstock is an historic town, which will lose its currency and appeal that it currently holds if this development goes ahead.  
• Parking in Woodstock is already a pain, and will be exacerbated by further development.  
• Any permitted development would create a precedent, which is unacceptable.  
• The Blenheim estate is acting recklessly and without any loyalty to the towns people.  
I would finish by saying that the landowner has tried for many, many years to gain planning permission to develop the land north east of Woodstock and has failed at every attempt for many of the same reasons that exist today. Indeed, the situation today regards traffic, infrastructure etc is worse that at any time in the past I would urge you to review these reasons, from which you will logically draw only one conclusion, and that is to refuse this development proposal. |
|               |                         |                 |                  |            |                   | I would like to register my objection to the proposed development of land North of Hill Rise, Old Woodstock.  
After 900 years of organic and sustainable growth the prospect of 670 new and unwanted houses which will double the size of the built area and the population of the town seems absurd. I believe it will irrevocably destroy our rural community, our interaction with the local environment and our community spirited way of life. There are many practical, human and emotional reasons why the continued development of Woodstock should not be permitted. There should be no further residential development in Woodstock since it has met its housing quota and as a long-time resident of Old Woodstock, it is my opinion that the Draft Local Plan for 2031 should not show farmland North of Hill Rise as suitable for future development.  
In my opinion the field is not suitable for development for the following reasons:  
Old Woodstock has no infrastructure which means that residents have to travel into the town on the busy A44 for every day things.  
Parking is inadequate within the town with the current level of population - it will be worse with the additional vehicles generated by further development of the town.  
The volume of traffic using the A44 is very high. Building an additional 120 houses behind Hill Rise will increase not help manage the pollution concerns or accident risk. The number of cars and the cumulative increase in accidents and congestion on the section of A44 adjacent to Hill Rise is clear to see.  
The proposed site will not provide safe and suitable access or exit points for vehicles, pedestrians and cyclists. Old Woodstock is an ancient town. The A44 is incredibly narrow in places and is straining with the current volume of use. We have counted 900 vehicles per/hr for 3 hours every morning and 3 hours every night. At peak times 6 articulated lorries every 10 minutes.  
The land behind Hill Rise has been agricultural for decades and forms the valley side to the River Glyme Valley. The proposed development will adversely affect the wildlife biodiversity habitats which are well established. We are privileged to see bats in our garden and a multitude of summer and winter bird life that will be lost if this habitat is destroyed.  
The field is essential to the way that people connect and integrate with the wider countryside and footpath system north of Old Woodstock. The footpath running through the proposed site is an ancient Public Right of Way that links the Parish of Wootton with Woodstock. Hill Rise was until 1970s part of Wootton and from |
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| MM551         |                        | James Cox       | Mr Cox           |                   | 1302       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | various locations along the footpath it is possible to see the Parish Churches of Wootton and Woodstock and for that matter the Palace from the field.  
Families with children in Hill Rise are finding it increasingly difficult to gain places at the local Primary School. An increase in population will makes access impossible.  
Local road infrastructure is already at breaking point. Traffic at the school gates is already extremely dangerous. The recent housing development at the back of the Marlborough School (Marlborough Place) has exacerbated the problem and conflict of vehicle movements at peak times and has become extremely dangerous to school children and pedestrians.  
There are 46 houses on Hill Rise, 120 unwanted house would swamp our community and make life intolerable. The town is not equipped to service the needs of such a drastic increase in population. There are few shops, one bank and only one grocery store. The Drs Surgery is difficult to access with the present population.  
Access to the play area and football pitch will be adversely affected.  
Why is necessary to develop Woodstock further? Marlborough Place and Banbury Road are recent development and have met the housing quota.  
Please do your best to allow proportionate development of our Woodstock. Blenheim has so much land it seems unjust that they are preserving the estate at the cost of our beloved town.  
I would like to register my objection to the proposed development of land North of Hill Rise, Old Woodstock.  
After 900 years of organic and sustainable growth the prospect of 670 new and unwanted houses which will double the size of the built area and the population of the town seems absurd. I believe it will irrevocably destroy our rural community, our interaction with the local environment and our community spirited way of life. There are many practical, human and emotional reasons why the continued development of Woodstock should not be permitted. There should be no further residential development in Woodstock since it has met its housing quota and as a long-time resident of Old Woodstock, it is my opinion that the Draft Local Plan for 2031 should not show farmland North of Hill Rise as suitable for future development.  
In my opinion the field is not suitable for development for the following reasons:  
Old Woodstock has no infrastructure which means that residents have to travel into the town on the busy A44 for every day things.  
Parking is inadequate within the town with the current level of population - it will be worse with the additional vehicles generated by further development of the town.  
The volume of traffic using the A44 is very high. Building an additional 120 houses behind Hill Rise will increase not help manage the pollution concerns or accident risk. The number of cars and the cumulative increase in accidents and congestion on the section of A44 adjacent to Hill Rise is clear to see.  
The proposed site will not provide safe and suitable access or exit points for vehicles, pedestrians and cyclists. Old Woodstock is an ancient town. The A44 is incredibly narrow in places and is straining with the current volume of use. We have counted 900 vehicles per/hr for 3 hours every morning and 3 hours every night. At peak times 6 articulated lorries every 10 minutes. |
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| MM552        |                        | Trevor and Elaine Stokes | -  Stokes | 1303 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | The land behind Hill Rise has been agricultural for decades and forms the valley side to the River Glyme Valley. The proposed development will adversely affect the wildlife biodiversity habitats which are well established. We are privileged to see bats in our garden and a multitude of summer and winter bird life that will be lost if this habitat is destroyed. The field is essential to the way that people connect and integrate with the wider countryside and footpath system north of Old Woodstock. The footpath running through the proposed site is an ancient Public Right of Way that links the Parish of Wootten with Woodstock. Hill Rise was until 1970s part of Wootten and from various locations along the footpath it is possible to see the Parish Churches of Wootten and Woodstock and for that matter the Palace from the field. Families with children in Hill Rise are finding it increasingly difficult to gain places at the local Primary School. An increase in population will makes access impossible. Local road infrastructure is already at breaking point. Traffic at the school gates is already extremely dangerous. The recent housing development at the back of the Marlborough School (Marlborough Place) has exacerbated the problem and conflict of vehicle movements at peak times and has become extremely dangerous to school children and pedestrians. There are 46 houses on Hill Rise,120 unwanted house would swamp our community and make life intolerable. The town is not equipped to service the needs of such a drastic increase in population. There are few shops, one bank and only one grocery store. The Drs Surgery is difficult to access with the present population. Access to the play area and football pitch will be adversely affected. Why is necessary to develop Woodstock further? Marlborough Place and Banbury Road are recent development and have met the housing quota. Please do your best to allow proportionate development of our Woodstock. Blenheim has so much land it seems unjust that they are preserving the estate at the cost of our beloved town. For many generations my family have been privileged to live in Woodstock. As far as I'm aware, for all this time the town and Blenheim have co-existed quite happily. - that is until recently. Every weekend and holiday time is taken up with events being held at Blenheim. I don't have a problem with this even though it seems little consideration is given to Blenheim to locals about congestion of our roads and the disruption to our lives. To co-exist, we realise that Blenheim's upkeep is expensive and as we love Blenheim we are happy to endure this. However, we are now being told that the surrounding countryside of our unique and beautiful town is to be 'concreted over' with yet more expensive houses. Supposedly once again, this is to meet the cost of the Palace. Well I find it unbelievable. Decisions which affect us so deeply are being made by people who don't live in Woodstock, have never lived in Woodstock and therefore have no real feeling for the town and the devastating effect this will have on Woodstock. I can understand how previously, farming/cattle didn't make enough revenue for Blenheim's upkeep but we can all see the amount of buildings already finished or under construction on Blenheim’s land, surely you don’t need to continue building at this rate to cover Blenheim’s needs. Some years ago, we, in Old Woodstock fought hard to keep our little Play Park (our only amenity). I remember being reassured when we heard Blenheim had bought the land, thinking “it will be safe with
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| MM553         |                         | Jane Rein       | -                | Rein              | 1304       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I wish to object to the inclusion in the Plan of "Land North of Hill Rise". The grounds of my objection are as follows:
1. The building of 120 more houses would place an intolerable strain on the local infrastructure - namely, the Woodstock schools and the surgery.
2. Parking in Woodstock town centre is now virtually impossible during working hours. The building of 120 additional houses in accordance with the Plan would inevitably make a bad situation even worse.
3. There is a public footpath that runs through the area of proposed development. The whole point of public footpaths is to enable people to enjoy a walk in the countryside. Thus, even if the right of way were preserved along the footpath through the proposed area of development, the pleasure of a walk through that area would be lost.
4. The proposed development would destroy existing green fields.
5. Access to the proposed 120 houses through Vermont drive would create additional safety concerns because of the additional number of vehicles that would use that access. There are already concerns about the safety of that access for residents of Old Woodstock. Creating an alternative access from the A44 would bring its own safety concerns.
6. The children's play area and small football pitch (valuable amenities for the children of Old Woodstock) would be lost. |
| MM554         |                         | Andrew Rein     | Mr               | Rein              | 1305       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I wish to object to the inclusion in the Plan of "Land North of Hill Rise". The grounds of my objection are as follows:
1. The building of 120 more houses would place an intolerable strain on the local infrastructure - namely, the Woodstock schools and the surgery.
2. Parking in Woodstock town centre is now virtually impossible during working hours. The building of 120 additional houses in accordance with the Plan would inevitably make a bad situation even worse.
3. There is a public footpath that runs through the area of proposed development. The whole point of public footpaths is to enable people to enjoy a walk in the countryside. Thus, even if the right of way were preserved along the footpath through the proposed area of development, the pleasure of a walk through that area would be lost.
4. The proposed development would destroy existing green fields.
5. Access to the proposed 120 houses through Vermont drive would create additional safety concerns because of the additional number of vehicles that would use that access. There are already concerns about the safety of that access for residents of Old Woodstock. Creating an alternative access from the A44 would bring its own safety concerns.
6. The children's play area and small football pitch (valuable amenities for the children of Old Woodstock) would be lost. |

Blenheim—how wrong I was! I could go on at length the many reasons for not building in the field at the back of Hill Rise but won't because you already know them all and the reasons still hold good today - nothing has changed.

However, I would ask you to think about us, your neighbour (the residents of Old Woodstock) and our quality of life. Would also like you to think about the wonderful Glyme Valley that adjoins the field and all the wildlife that inhabits it, it would decimate it. Walking the field every day, we are constantly in awe of the sheer beauty we see and the tranquility we feel throughout the seasons.

Please consider also, the Flora and Fauna that delight us and the many walkers we meet, enjoying this precious amenity. Have you seen the conservation work that Mr Paul Snell and other environmental organisations have undertaken recently and are planning to continue to undertake?

This will leave a legacy that they can be proud of and future generations can enjoy. I wonder, will you be proud of your legacy?

I have wonderful memories as a child playing in and around the field. We spent hours there exploring, picking wild flowers, watching the deer and having 'play battles' Woodstock vs Old Woodstock. I am well aware how lucky we were, I just want my grandchildren and everyone else's to be just as lucky. Blenheim is fortunate to own a great deal of land; surely it would be possible to build a new village/town on less contentious land, leaving Woodstock to grow at a more natural rate.

Finally, please, please have a heart; don't destroy our precious field.
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| MM555         |                         | Angela Prior  | Mrs              | Prior             | 1306       | LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | 1. The building of 120 more houses would place an intolerable strain on the local infrastructure - namely, the Woodstock schools and the surgery.  
2. Parking in Woodstock town centre is now virtually impossible during working hours. The building of 120 additional houses in accordance with the Plan would inevitably make a bad situation even worse.  
3. There is a public footpath that runs through the area of proposed development. The whole point of public footpaths is to enable people to enjoy a walk in the countryside. Thus, even if the right of way were preserved along the footpath through the proposed area of development, the pleasure of a walk through that area would be lost.  
4. The proposed development would destroy existing green fields.  
5. Access to the proposed 120 houses through Vermont drive would create additional safety concerns because of the additional number of vehicles that would use that access. There are already concerns about the safety of that access for residents of Old Woodstock. Creating an alternative access from the A44 would bring its own safety concerns.  
6. The children's play area and small football pitch (valuable amenities for the children of Old Woodstock) would be lost.  

| I am writing to you concerning the proposed housing development on the farm land behind Hill Rise, Woodstock. Having lived in Woodstock for 30 years I have watched the town develop and change - which is the way it should be.  
In the light of changes however, I firmly believe that the housing development on the land to the North East should NOT now go ahead for many practical reasons:  
• The A44 is a very busy road and the section in front of Hill Rise is a particular accident black spot. Any increase in traffic associated with extra housing can only make the situation worse.  
• Vermont Drive is too narrow to cope with the extra traffic an estate would create. There is frequently a queue of cars waiting to turn out from there during busy periods. Any other access points from the estate would come out onto the dangerous section of road outside our house.  
• We have no facilities up here to support more families - e.g. schools, shops, doctors - sending more traffic onto the main road.  
• Parking in Woodstock town is now a huge problem. As a resident I like to shop locally but because I find the hill and the traffic conditions between Hill Rise and the Woodstock very difficult, I tend to drive into the town - as I suspect others do. (The situation isn’t helped by Blenheim’s £8 parking charge for special events. People park in town and walk in.)  
• The Outstanding primary school in Woodstock is now reaching capacity even though it recently expanded to accommodate more children. Families will tend to drive (the school bus from here was removed many years ago) making the traffic situation around the schools - which is bad now - even worse.  
To summarize, Old Woodstock and the main town are already under huge pressure from the new housing we now have. It is difficult to visualize how we could possibly handle any more. |
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<td>MM556</td>
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<td>Daniel Soanes</td>
<td>Master</td>
<td>Soanes</td>
<td>1307</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>For the above reasons we strongly object to any more housing development. I am writing this letter to ask you to not close the Old Woodstock football pitch and play park, and not to build more houses in Old Woodstock. I have grown up playing in this park and if this park wasn't there, I wouldn't have the friends I have today. This park means a lot to the children and adults of Old Woodstock and it brings people together and creates a nice, friendly environment for us to have fun in. At this park, it may seem to you there are only a few things to do, but the space provides the children of Old Woodstock somewhere to have fun. In the park, there is lots of equipment for kids old and young to play on. The main reason I go the park is to play football on the pitch beside the playground, where I have kickabouts with my friends and get exercise instead of just playing on my Playstation. My 7 year old brother goes to the park to play on the roundabout and the climbing frame, and has made many new friends. My parents love walking in the fields with our pet dog as it is conveniently close to the playground, so they can still keep an eye on us. In this park, we have many social events like Summer parties, etc and these events bring the children and adults of Old Woodstock together. This park and the fields mean a lot to us (the citizens of Old Woodstock) and we will do whatever it takes to keep the park and the fields that we love very much. My brother and I have lived in Old Woodstock all our lives, and having the park here makes life so much more fun and it has brought us closer together. Before we first went to the park, we didn't want anything to do with each other, but playing in this park has made us realise that it's great to have each other's company and that we can have more fun together. This park means everything to me and my brother and we don't want to see it get crushed and replaced by a housing estate. If this park does get destroyed, then other children and siblings won't have the chance to bond with each other, and might never be as close. Also, there will be lots of negatives to building more houses. I know there are positives and negatives for everything, but the negatives in this plan are very bad. Firstly, it would disturb the quiet nature of Old Woodstock, there would be loads more cars driving on our estate making it not as safe. Secondly it would give all the children of Old Woodstock, especially young teenagers like me, nowhere to play or interact with others. Finally, it would mean that if the children of Old Woodstock wanted to play football together, they would have to go to the other end of Woodstock to play which means having to get parents to take them as it's not a safe walk along that very busy main road where the pavement is so narrow in places. Having a new housing estate in Old Woodstock would mean that the small town of Woodstock would become over populated, meaning that there won't be enough places in local schools. New kids moving here would find it boring, and I don't blame them for thinking that, because with no park, football pitch or fields Old Woodstock would be dead. Their parents would probably need to travel out of Woodstock to find a place at a school further away, adding to the traffic. Please Woodstock Council, don't close our park down and build on the football pitch and fields. If you do, us children won't be able to grow up in a quiet, friendly and safe environment like we are now.</td>
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| MM557         |                         | Sarah Jane Airey | Ms               | Airey              | 1309       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | In relation to Hill Rise:  
  • The A44 just north of Hill Rise is noted for accidents including several fatal ones. Access to a new development would make this dangerous section of the road even more unsafe.  
  • The A44 south cannot be widened to cope with new traffic. It is not a safe stretch of road either, especially for cyclists. My husband was knocked off his bicycle along this stretch of road.  
  • There are no local amenities/shops etc which will inevitably lead to more traffic.  
  • The footpath alongside is very narrow and unsafe if you are wheeling a buggy or wheelchair. Large wide loads can make you feel very vulnerable as they speed past pedestrians. |
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<td>MM558</td>
<td>Henry English</td>
<td>• The Glyme and Dorn valley is particularly beautiful and the proposed development would adjoin the conservation area which would be spoiled.</td>
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<td>I live in Old Woodstock and am 13 years old. I am against the land Northeast of Hill Rise being developed with 120 houses, for the following reasons:</td>
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<td>I walk to and from the Marlborough School everyday along Manor Road. This is an extremely busy and dangerous road. On a regular basis I have felt cars and lorries coming very close to me on the pavement as both the road and the pavements are really narrow in places. This makes me feel nervous and I would not want any more traffic on this road, especially lorries.</td>
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<td>I love living in Old Woodstock as I have the freedom to play in a way I didn't have when I lived in the centre of Woodstock. This is because we have a great football pitch and playground and it is a lovely small, safe community. When I go to the football pitch all age groups and genders get together to play and I would be heartbroken if this were to go. Also our small, friendly community would be changed so much if it were to increase by 50%!</td>
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<td>We often walk from Old Woodstock to Wootton, which is through beautiful countryside and I cannot believe that people would be allowed to build houses there and destroy the wonderful countryside that so many people enjoy all the time.</td>
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<td>We are worried that my little sister will not be able to get into Woodstock Primary School and I don't know where small children would go to school from a new housing estate.</td>
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<td>I think that Old Woodstock is the worst possible place you could choose to build lots of houses. We have no shops, doctors, schools and the road connecting us to the centre of Woodstock is awful. Please don’t spoil our community.</td>
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<tr>
<td>MM559</td>
<td>NBurton</td>
<td>We are most concerned about the proposed 120 homes behind Hill Rise and oppose it for the following reasons.</td>
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<td>1. There are no facilities, such as surgeries, shops, schools etc. in Old Woodstock so residents have to go into the town centre for day to day needs.</td>
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<td>2. Parking has become a huge problem in the town centre; sometimes it is impossible to park, even in the car park, so residents have to go elsewhere.</td>
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<td>3. I understand that brownfield sites should be chosen for building where possible. Building on good agricultural land in an area which is so unspoilt, and with such lovely views should be a very last resort. Apart from this, The CPRE questions the need for so many houses in Oxfordshire.</td>
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<td>4. The road down into the town is hazardous. There are no “effective pedestrian &amp; cycle links” into the town centre, as has been claimed. There is the main road, which is narrow, hilly, bendy, with narrow pavements (in some places less than 31”) and with windows that overhang and doorsteps which have to be avoided, meaning pedestrians are even closer to the traffic. There is also considerable pollution from the traffic.</td>
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<td>5. Even now, infants due to start school are being denied places and are having to travel several miles towards Oxford. Thus, more traffic, more pollution.</td>
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<td>These are just some of the reasons for this proposal to be turned down.</td>
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**Note:** The document contains information about a proposed development in Woodstock, Oxfordshire, and the concerns of local residents regarding it. The text highlights issues such as increased traffic, the need for better facilities, the preservation of the natural environment, and the impact on local community life.
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<tr>
<td>MM560</td>
<td></td>
<td>Kim Evans</td>
<td>Ms</td>
<td>Evans</td>
<td>1312</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>We sincerely hope Woodstock can be saved from further development. I strongly disagree with the planning in Old Woodstock for the reasons below. The traffic is already at a max, crossing the road to catch the S3 to Chipping Norton at 7.30 am is already difficult for my daughter to do. Something I do with her as I don't trust the traffic. The other morning we had to wave the bus down from the wrong side as we couldn't cross the road. Already the traffic going through the town is at its max. Pollution from all the vehicles is already high, more houses- more vehicles more pollution. We have no shops, schools or doctors in Old Woodstock meaning we either walk or drive to our local shops in the middle of Woodstock. Walking is not safe due to the pavements along the A44 and the traffic. Lorries are larger than the width of their lane and hang over the pavements. I do not trust my children walking in as I worry about the size and volume of traffic along that road. Building 120 houses behind Hill Rise means an extra 200 cars driving down the hill and through the town. You cannot park in Woodstock on a regular basis. Doctor appointments - having to park near the library and walk to the doctors. When you are unwell yourself or when your child is unwell, this is not a pleasant journey. The amount of illegal parking during the day and evening has increased. This makes crossing the road and driving very dangerous. Last Friday around 9.00pm I wanted to stop at the Co-op on my way home. I circled the town 3 times trying to park, nothing. There were cars parked outside the Crown all the way up to their doors. There were cars parking in the road beside the parked cars. This is my local shop and I couldn't even park to grab some milk. We try and support our local shops but not able to park the car makes you drive elsewhere. The primary and secondary school is already full meaning children on our road are not getting into their local school. Meaning Wood stock children will need to travel outside their local area, meaning more vehicles on the road. Children born and raised in Wood stock cannot go to their local school! The field behind Hill Rise are used daily by walkers, children and wildlife such as deer, foxes, snakes, bats, rabbits and badgers. The play area and football field is used all year round by families and children. This is the only playground in Old Woodstock. The football field is used by all members of the public, a group of men play football every week through the spring and summer. Often impromptu football games go on by children and parents. The whole community gathers here throughout the spring and summer. We have an annual picnic and rounders’ community get together in the football field. The whole community comes together. I think it is a serious mistake to assume that Wood stock can go on increasing its population. without resulting in problems that can never be solved. The infrastructure cannot be put under more pressure. Blenheim Palace and grounds are a World Heritage Site. We have a duty to preserve the unique and historic town.</td>
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<td>MM561</td>
<td></td>
<td>Lisa Cox</td>
<td>Ms</td>
<td>Cox</td>
<td>1315</td>
<td>&gt; SECTION 9 - STRATEGY</td>
<td>I would like to register my objection to the proposed development of land North of Hill Rise, Old Woodstock. I was born and went to school in Woodstock, as did my parents, grandparents and great-grandparents. I have</td>
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<td>AT THE LOCAL LEVEL</td>
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<td>&gt; Eynsham</td>
<td>lived in Hill Rise since 1996. We moved from New Road in the town centre to be closer to the countryside. My family have lived, worked and contributed to community affairs in Woodstock for many generations. I strongly feel that Woodstock forms an important part of my identity. After 900 years of organic and sustainable growth the prospect of 670 new and unwanted houses which will double the size of the built area and the population of the town seems absurd. I believe it will irrevocably destroy our rural community, our interaction with the local environment and our community spirited way of life. There are many practical, human and emotional reasons why the continued development of Woodstock should not be permitted. There should be no further residential development in Woodstock since it has met its housing quota and as a long-time resident of Old Woodstock, it is my opinion that the Draft Local Plan for 2031 should not show farmland North of Hill Rise as suitable for future development. In my opinion the field is not suitable for development for the following reasons: • The volume of traffic using the A44 is very high. Building an additional 120 houses behind Hill Rise will increase not help manage the pollution concerns or accident risk. The number of cars and the cumulative increase in accidents and congestion on the section of A44 adjacent to Hill Rise is clear to see. • The proposed site will not provide safe and suitable access exit points for vehicles, pedestrians and cyclists. Old Woodstock is an ancient town. The A44 is incredibly narrow in places and is straining with the current volume of use. We have counted 900 vehicles per/hr for 3 hours every morning and 3 hours every night. At peak times 6 articulated lorries every 10 minutes. • The land behind Hill Rise has been agricultural for decades and forms the valley side to the River Glyme Valley. The proposed development will adversely affect the wildlife biodiversity habitats which are well established. We are privileged to see bats in our garden and a multitude of summer and winter bird life that will be lost if this habitat is destroyed. • The field is essential to the way that people connect and integrate with the wider countryside and footpath system north of Old Woodstock. The footpath running through the proposed site is an ancient Public Right of Way that links the Parish of Woolton with Woodstock. Hill Rise was until 1970s part of Woolton and from various locations along the footpath it is possible to see the Parish Churches of Woolton and Woodstock and for that matter the Palace from the field. • Families with children in Hill Rise are finding it increasingly difficult to gain places at the local Primary School. An increase in population will makes access impossible. • Local road infrastructure is already at breaking point. Traffic at the school gates is already extremely dangerous. The recent housing development at the back of the Marlborough School (Marlborough Place) has exacerbated the problem and conflict of vehicle movements at peak times and has become extremely dangerous to school children and pedestrians. • There are 46 houses on Hill Rise, 120 unwanted house would swamp our community and make life intolerable. The town is not equipped to service the needs of such a drastic increase in population. There are few shops, one bank and only one grocery store. The Drs Surgery is difficult to access with the present population. • Why is necessary to develop Woodstock further? Marlborough Place and Banbury Road are recent development and have met the housing quota.</td>
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| MM562         | Pat Crutch              | -               | Crutch          | 1316      | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | Morally the proposal is wrong. It is unacceptable that the landed gentry can change the character of such a historic town in order to generate money for their estate. The people of the town will be living this legacy not the social elite.  

I hope that you will have the courage to represent the views of the 'common man'. We have a duty to develop and preserve our town sympathetically and for future generations. In my opinion greed is not a justifiable reason to make such a drastic and damaging change to the character of the historic town of Woodstock.  

I am writing to protest at the application to build 120 houses on the field adjoining Hill Rise in Old Woodstock. I had lived in Hill Rise throughout my life until one year ago; I then moved to a smaller house in Old Woodstock which provided a three bedroom house for a young family. I know times change but, in my lifetime, I have seen Old Woodstock lose an Infants’ school, a church, a small glove factory, a public house, a garage with petrol sales and a small grocery shop which leaves residents with just a children’s playground/football practice pitch and a public house (Black Prince) as the only places for social gathering. (Until about the 1970’s Blenheim provided two football pitches in the Old Woodstock area of the park which were much used and appreciated).  

Old Woodstock residents of Hill Rise, Vanburgh Terrace and Mavor Close enjoy and appreciate their open views to the north and east and loss of these facilities must surely lower the value of their properties. There is a public footpath to Wootton across the proposed building area and this has become a much used and much appreciated feature since Barn Piece estate was built in the 1960’s.  

If permission is granted for the proposed 120 houses this will increase Old Woodstock’s housing total by half as much again with no on-the-spot facilities of any sort for the new residents. This large number of houses at such a distance from the town shops and local Schools will necessitate car use and because the town is already full of parked cars it seems unlikely that these new residents will use local shops - much easier to motor on to Kidlington or Oxford. For new residents without cars e.g. young mums with push chairs there would be a long walk into Woodstock along the very busy A44 which has narrow pavement in places. Similarly primary age children would face the long walk to school. From about 1948 there was a school bus to the primary school but this was cancelled a few years ago.  

If no extra vehicle accesses to the A44 were arranged the pressure on the present Vermont Drive would become excessive. Nowadays most houses own two cars; that could provide at least 100 extra vehicles using the junction.  

Would the developers be required to supply sufficient car parking spaces for the new houses? Already there is no spare parking on the Barn Piece estate as it is used by residents of Manor Road as well as those in Barn Piece.  

Could developers be required to retain the playing ground and football pitch present position? The two young trees on the play area were provided and planted at the expense of the Wood stock Natural History Society in 2000; would they be left in place?  

What assessment will be made as to extra pressure on the doctors’ surgery bearing in mind that Hill Rise is only one of two or three extra housing site applications for Woodstock and the surgery seems already to be at full stretch most days.  

Please take in these concerns when considering the suitability of the Hill Rise area for extra housing. There is
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<td>MM563</td>
<td></td>
<td>Minh Ha Duong</td>
<td>-</td>
<td>Duong</td>
<td>1317</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I am writing to you because I have heard that there may be plans to develop land northeast of Hill Rise. As a resident of Hill Rise I'd like to voice my concerns as I believe this area is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan. I understand that 670 new houses are included in the Local Plan. I think that such massive expansion would change the special character of Woodstock and put further strain on the oversubscribed primary school and parking facilities in town. I know that new housing is desirable but would urge that any new developments should be on a reasonable scale, and take into account any strain on infrastructure. I think 120 houses around Old Woodstock (doubling its current size) would be particularly unsuitable. Firstly, it would cause significantly more traffic travelling the whole length of the A44 through Woodstock. Residents already have to travel through Woodstock to access shops, the schools and healthcare services. It's likely they will also travel that way for work (certainly the case for my husband and I). If access to the new estate is to be through Vermont Drive, as shown on the plan, the increased congestion would be horrendous. I already have considerable safety concerns about that section of the A44. We have two young children pushing them along the narrow pavement while lorries speed by is not a pleasant experience. We know of several serious traffic accidents that have occurred along that stretch - increased traffic would worsen our concerns. It would also add to pollution levels. My eldest daughter is lucky to be in Year 1 of Woodstock’s outstanding primary school, and I have just applied for a place for my youngest daughter. Hopefully she will be offered a place as she has a sibling at the school already, but I fear some of my neighbours may not be so fortunate. More new housing would exacerbate this problem. We regularly use the playground in Old Woodstock, and enjoy the open spaces at the back of our houses. Presumably we would not have access to these for at least a year while houses are constructed (and assuming that this amenity would not be lost altogether). Finally, we love the natural, unspoilt beauty of this area. It’s a stunning area of Oxfordshire, and I think it’s special beauty should be preserved. I’m strongly against including the Hill Rise development in the Local Plan for Woodstock, as I know are many of my neighbours. I hope our grave and valid concerns will be taken seriously.</td>
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<td>MM564</td>
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<td>Warwick Freeman</td>
<td>-</td>
<td></td>
<td>1318</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I believe that the land Northeast of Hill Rise in Old Woodstock is not suitable for development and should not be included in the west Oxfordshire local plan. I have been an Old Woodstock resident for many years and have seen a massive increase in traffic on the main road the A44 and feel an added 120 houses who’s only exit is onto the A44 would massively congest this road further. We have no amenities in Old Woodstock and therefore all residents have to make trips into Woodstock for the school (which is full), doctors (which has a 2 week waiting list for an appointment) and shops and most will drive. As you are aware parking in Woodstock is almost impossible, to put more houses a drive away would create all sorts of problems with parking. Walking into town is already a risk due to vehicles parking on the footpath due to lack of spaces, anyone with small children or in a wheel chair take a huge gamble! The field in which the development is planned plays a vital role within the Woodstock community, it’s long been a tradition for people to meet up, walk their dogs, have a chat and watch their kids play within this field. It is not just a haven for people but also wildlife with the wildflowers running along the footpath’s and ancient hedgerows with masses of bird life and I feel this could all be lost with such a massive development, nearly</td>
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<td>MM565</td>
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<td>Sophie Rogers</td>
<td>-</td>
<td>Rogers</td>
<td>1319</td>
<td>50% increase in households in Old Woodstock. I would like to add that this field has also been used by the air ambulance on more than one occasion to come to the aid of very serious road traffic accidents which have occurred on the strip of the A44. I am aware that housing is needed within West Oxfordshire but feel very strongly that this site is not appropriate and will cause huge problems for the local and wider community in regards to traffic, schooling, health care, pollution, and road safety. I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons: Amenities, Old Woodstock has no amenities to cope with an increase of housing to this level. We have no school, shops, library, dentist or surgery nothing but a playground which will be built on if this development goes ahead. So most people will have to go into Woodstock for shopping, doctors, schools etc. With this development being so far out of town it will force people to use their cars and as you are probably aware there is very limited parking within Woodstock so I’m unsure as to where all these extra cars will be able to park. If you can get people to leave their cars at home and walk into town then they will come across problems walking the A44, the pavement gets very narrow at points and hard to push a buggy or wheelchair through, in winter the steep slope up and down past the black prince pub are pretty lethal with ice. Jobs, there are no jobs in old Woodstock for an increase in the population making most people commute which in turn will add more pressure on the road system. Roads, we already have huge problems with the A44 which runs through the middle of Woodstock. pollution, heavy vehicles and congestion could all be worsened by this development. In the short term, lorries and work vehicles having to turn off the A44 to enter this new development could cause not only traffic jams and disruption but no doubt a number of accidents. In the long term, The A44 is a very busy road and we already see congestion at peak times. This particular stretch of the A44 has had four accidents in the last three years that I have witnessed and one of which needed the assistance of an air ambulance which landed in the field where the development is planned. All traffic from this development will only have the A44 as an entrance and exit which will cause huge tailbacks and bottlenecks going through Woodstock and on to Oxford. Schools, We have insufficient school places for old Woodstock, my own child didn’t get into the closest school (Woodstock c e primary) last year so an extra 120 houses would only add to this problem. Wotton primary school, the second closest school to this development is deemed an unsafe route for children to walk so again people will either have to put their children into cars or rely on the council to provide transport for them which will add pressure to the local council stretched funds. The countryside, The Field in which the development is planned is a very important part of Old Woodstock, it’s where our community comes together, we all watch the combine harvester in action each year, celebrate the Queen’s birthdays with big tea party’s and watch the kids in our community play on the football pitch, ride bikes around the field, bird watch and go on adventures in the Oxfordshire countryside. There is the Oxfordshire Way footpath running straight through the middle of the field, we all walk our dogs and children across this path, I can’t see how this will be kept in a new housing development? This field offers a place our children can enjoy the freedom to explore farmland and nature without the worries of a road anywhere near.</td>
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It may look like just a piece of arable land but this field is immensely important to everyone that lives around it and I do hope that we will be able to keep this beautiful green space that we all love so much.

I am writing to express some important reasons why the land Northeast of Hill Rise is unsuitable for houses development, and therefore should not be included in the West Oxfordshire Local Plan.

1. RECREATION FACILITIES

During the last few years, young families with small children have moved to live in Old Woodstock, where their children enjoy using the recreation facilities and the football pitch available in the land where the proposed development, if approved, will be built. This will be a very big lost and will deprive them of a safe, healthy and unpolluted open space.

2. INFRASTRUCTURE

At present, there is not any infrastructure in Old Woodstock. We are dependant of the already outgrown facilities in the Town Centre for shops, schools, surgery, church etc. which are accessible by walking, driving, cycling or using the S3 bus coming from Chipping Norton. However, the footpaths at both sides of the A44 road are narrow and dangerous, for both pedestrian and vehicular traffic - not to mention the various private cars parked along the A44 worsening the safety.

3. INCREASE OF TRAFFIC

The centre of Woodstock already suffers with parking problems. It is practically impossible to find a parking space. Many people use the roads and pavements in our estate as a car park now and the situation will worsen when the estate have to cope with 240+ additional cars.

4. ACCESS TO THE NEW DEVELOPMENT

Vermont Drive is a narrow busy road which at present can hardly cope with the existing levels of traffic, leave alone with the additional 240 cars (120 houses x 2 cars per household) that the new development will bring. It will be dangerous, impractical and irresponsible not only for the drivers but also for the elderly population that walk around the estate to keep healthy and enjoyed some fresh air.

5. SCHOOLS

Woodstock Primary School is already oversubscribe, therefore children have to attend schools in neighbouring villages by being taken by schools buses or private cars, which will put pressure on parents and traffic. The Marlborough School is situated almost 2 miles from the proposed site and the only access is via the A44 and town centre, thus worsening the already overcrowded main road at pick times for work and school.

6. SURGERY

The Woodstock Surgery is situated in the centre of town and is already overstretched as it not only serves to the residents of Woodstock but also inhabitants from the neighbouring villages. The premises are very small and there is no room to expand. A new surgery is urgently required. At present, we can only survive and cope thanks to the dedication, hard work and professionalism of our doctors.

I sincerely hope that after your careful consideration of the issues listed above, the Council reach to the
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<td>MM567</td>
<td></td>
<td>S G Scott</td>
<td>-</td>
<td>Scott</td>
<td>1321</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I write to suggest that the land bordered by Hill Rise and Vanbrugh Close in Old Woodstock should not be included in the West Oxfordshire Local Plan. The proposed site is remote from the town, and will make a compact, overcrowded area without proper links to the town and other infrastructure. The existing Barn Piece estate has 112 houses and the proposed new development would more than double that development making Old Woodstock an overdeveloped area taken together with Hill Rise and Manor Road (a further 170 existing houses). Old Woodstock has no infrastructure (no shops, no schools or doctors etc) and the proposed site access is approximately one mile from the town of Woodstock, accessed only by the already busy A44. Footpaths bordering the A44 between Old Woodstock and Woodstock Town are extremely narrow and pedestrian, including mothers with pushchairs often seem at risk at present from heavy vehicles and fast moving traffic. More pedestrian and vehicular traffic from the proposed new development would increase safety concerns considerably. (see photos). The primary school in the town is already over-subscribed and children from the new development would be unlikely to find places there, resulting in car journeys to other towns and villages. For older children, the Marlborough School is almost 2 miles from the proposed site approached only by the A44 and the Town Centre. there is no other route to local schools other than the busy A44 with heavy lorries and narrow pavements. These aspects alone - lack of infrastructure, limited safe access to the town and overcrowding of the area - make this site unsuitable for a development of this size, I believe. The proposed access to the new development via Vermont Drive is also the only access to the existing Barn Piece estate and a bus route and terminus. It is a residential road about 100 yards long and only 17 feet wide. The bus service is highly valued locally. There are 10 buses a day (8 on Sunday) which reverse at the junction with Rosamund Drive and wait in Vermont Drive for a few minutes each. At the time of bus visits, one way traffic is only possible in Vermont Drive and HGVs passing the bus have to use the pavement. Vans, lorries, coaches and cars often use the Rosamund Drive and Vermont Drive junction to reverse and turn back towards the town. At busy times, when residents are leaving for work or returning home, Vermont Drive and this junction already cannot cope with existing levels of traffic. Vermont Drive is too narrow to support both existing traffic and the extra traffic the proposed development would bring. The suggestion that another access to the proposed site could be made from the A44 north of Hill Rise, seems impractical. The A44 is too narrow to allow for right turning traffic in a 50mph limit and major alterations to Hill Rise would be necessary to arrange an opening from the very narrow service road there.</td>
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<td>MM568</td>
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<td>Richard Sansom</td>
<td>Mr</td>
<td>Sansom</td>
<td>1322</td>
<td>The children’s play area at the end of Rosamund Drive, now intended for closure to give access to the new development, has a special significance for Old Woodstock residents and will be a tragic loss. In 2013 it was saved from closure when Blenheim Estates purchased the field, following strong local protest and newspaper coverage. It seems unlikely that the play area, together with its associated half-sized football pitch for children can be relocated in its present form within the new development so as to be as accessible and popular as it is now. Above all the new development would remove a piece of countryside with a town to town public footpath running through it, which has become important to all local people, particularly those with houses bordering the field. The footpaths along three sides of the field have been used by local families for decades, as shown by a recent Town Council survey identifying these as well used local paths familiar to local people of the present time and generations past. The loss of countryside to Old Woodstock would be significant and intrusive. The prospect of the loss of a well loved green field for overcrowded development seems tragic and unnecessary. More houses are needed but not just where someone is prepared to sell a green field, development only on carefully considered appropriate sites.</td>
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<td>MM569</td>
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<td>Nicola Onions</td>
<td>-</td>
<td>Onions</td>
<td>1323</td>
<td>I am against the development behind Hill Rise because: 1. Woodstock is a unique, ancient, historical town and its unparalleled character should not be sacrificed. 2. It sites in a beautiful landscapeand that should be preserved. 3. There are other brownfield sites which should be used. 4. Some children born and bred in Woodstock cannot now even get a place in the primary school, meaning they must now be taken by car several miles to other schools. This just isn’t fair. More houses will mean more traffic to schools further away. 5. Parking in Woodstock is even worse than a year ago. Eventhe car park now is frequently full up so residents have to shop elsewhere. 6. Vermont Drive is far too narrow for the large increase in traffic which would result if the development goes ahead. It would utterly change its peaceful character for those already living here.</td>
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1. There are no shops, schools, surgeries in Old Woodstock so the residents have to go into Woodstock centre for their everyday needs. 2. There are no cycle tracks into the town centre and parts of the footpaths are so narrow (in some places less than 31” or 0.8m ) that to walk into the town is not a pleasant experience. 3. The road from Old Wood stock into the town centre is often very busy, with many huge vehicles. In places the road is so narrow that vehicles are too wide to keep to their side of the road. 4. It is often impossible to park in Wood stock, even in the car park. 5. The primary school is already turning away Wood stock children because there are no more places available. That is appalling. It means more cars going through the town centre to schools further away. We
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| MM570         | Trevor Onions   | 1324       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | 6. Vermont Drive is far too narrow for the considerable amount of traffic which would be involved and access would be over the play area which my brother was instrumental in having built there.  
7. There are plenty of brownfield sites in other areas which should be built on without using good agricultural land and destroying the lovely countryside round Woodstock.  
8. Woodstock is a unique historic town and should be protected. I think it is a serious mistake to think that its population can go on increasing, without destroying its very special character. |
| MM571         | G Sansom        | 1325       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I am really worried about the possibility of houses being built behind Hill Rise. Most people who would live there would be likely to go towards Oxford for work, so the traffic going through the town would be greatly increased. It would also be greater because both the primary and secondary schools are on another side of Woodstock.  
The pavement from Hill Rise to the town centre is very narrow in places, so a lot of parents are not happy for their children to walk to school.  
I notice that it has been said that there are good pedestrian cycling routes into Woodstock Town Centre. That is definitely not the case. The cycle route is mainly on the main road, in parts where the road is most narrow. Very few parents would want their children to cycle on the road.  
If more people move to the area, it will create an even greater problem for schooling. Already some children are unable to go to the infants school because there are no places. Ideally small children should be able to start school nearby, where they can make local friends and become part of the local community. If they have to go several miles to another school, friendships outside school become far more problematic, meaning much more travel further afield.  
Please don't spoil the character of Woodstock. Say NO to further development. |
| MM572         | Charlotte Guillain | 1326 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | We were dismayed to learn that WODChas earmarked land north of Hill Rise in Old Woodstock for 120 new homes.  
There are no facilities in Old Woodstock - no shops, no schools, no health facilities. Anyone moving to new homes on this site will inevitably end up driving into Woodstock for their needs, where there are already huge parking problems. The only route into Woodstock town centre is along the A44, which is already becoming busier and busier. Residents only way of walking into town is along narrow footpaths that feel very unsafe when lorries thunder by. More traffic, caused by more households, would make the route even more congested and less safe for our children walking to school. |
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<td>MM573</td>
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<td>Lucy Shaw</td>
<td>Mrs</td>
<td>Shaw</td>
<td>1327</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>In addition, there simply isn’t enough space in the schools or health centre for this many new households and this would also have a knock-on effect to neighbouring villages. One of our biggest concerns would be the loss of the play area in Old Woodstock. This is used by many local families and is a community hub for families to come together and get to know their neighbours. If this disappears it will fracture our community. The open countryside beyond the play area would also be lost. This is enjoyed by local people and visitors alike, with many people using the footpaths across the fields. We urge you to reconsider this site for such a large housing development. Together with other proposals for new houses in and around Woodstock, this would completely change the nature of our town and very possibly deter the many visitors from coming to our shops and businesses.</td>
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<td>MM575</td>
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<td>Charlotte English</td>
<td>-</td>
<td>English</td>
<td>1343</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I am extremely surprised that the land northeast of Hill Rise is again being considered for development. I believe that this is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons: There is no infrastructure in Old Woodstock, such as shops, school, doctors etc. which means all residents have to travel into town on the bus/A44 for everyday things. This is not the case for other sites in Woodstock. Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock. We already have very serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has ’effective pedestrian and cycle links to the centre of Woodstock’.</td>
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Those living here know this to absolutely NOT be the case. Old Woodstock just can't take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There are many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

Indeed, I have been informed that the narrowest part the road is only 5.5m wide and therefore not wide enough to accommodate two lorries (of legal maximum width) passing in opposite directions. Therefore it is not surprising that HGVs are mounting the pavement. Further to this A Road Safety Audit for ‘Woodstock Primary School Parents Group’ (Old Woodstock) stated in November 2010 that, ‘Only limited sections of the only viable route from Old Woodstock to the primary school are considered safe for accompanied children of primary school age. No section of the route is suitable for unaccompanied children of primary school age’. Therefore more traffic and HGV vehicles travelling through this road are going to make it even more dangerous.

Parking is dreadful in Woodstock already and would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. It could be argued that we have a bus service, but the reality is that I know very few people that use this service on a daily basis. Unless you have plenty of time in the day and a bus pass, this is not practical for many families to do on a regular basis. Many families need to travel into town up to several times a day and wouldn't have the time or the money to do so. I think it is important to consider what people actually do (and will continue to do) and not what they 'can' do. In reality I do not know of anyone who uses the bus on a regular daily basis to travel into Woodstock centre. This is the harsh reality local residents know all too well and not the case for other sites.

Old Woodstock already has a problem with schooling. There is already a crisis looming with children from Hill Rise not getting into Woodstock Primary School and Wootton doesn't have capacity. Any children living at the new development may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic problems.

It would be necessary to remove a valuable piece of countryside from Woodstock which would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

The extremely strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

We could lose the use of the play area and football pitch for at least a year, whilst construction takes place.

Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to
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<tr>
<td>MM576</td>
<td></td>
<td>John Mullen</td>
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<td>Mulllen</td>
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- **SECTION 9 - STRATEGY AT THE LOCAL LEVEL**

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

1. **Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.**

2. **Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock.**

3. **Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.**

4. **Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, 'effective pedestrian and cycle links to the centre of Woodstock'. Those living here know this to absolutely NOT be the case. Old Woodstock just can't take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.**

5. **Old Woodstock already has a problem with schooling. Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake = only 105 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.**

6. **Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.**

7. **We could lose the use of the play area and football pitch for at least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play, in addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.**
Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

Vermont drive is too narrow to support new and existing traffic.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

We would add that (point 4) walking down the hill and up again (the Black Prince pub on the left) into Woodstock, we often feel currently we are taking our lives in our hands, particularly when taking small grandchildren with us. The paths are too narrow with no grass verge between us and very fast moving traffic, often travelling in excess of 50 miles per hour (30 mph limit) currently. This situation would become much much worse and life threatening.

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.

Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock.

Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.

Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, 'effective pedestrian and cycle links to the centre of Woodstock'. Those living here know this to absolutely NOT be the case. Old Woodstock just can't take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

Old Woodstock already has a problem with schooling- Currently at capacity with Hill Rise children not getting...
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<td>MM578</td>
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<td>Janey Dalton</td>
<td>-</td>
<td>1346</td>
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in. Could go to 2 year intake = only 105 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.

Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

We could lose the use of the play area and football pitch for at the least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play, in addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.

Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

Vermont drive is too narrow to support new and existing traffic.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.
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I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.

Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock.

Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for...
everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.

Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, ‘effective pedestrian and cycle links to the centre of Woodstock’. Those living here know this to absolutely NOT be the case. Old Woodstock just can’t take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

Old Woodstock already has a problem with schooling- Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake = only 305 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.

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Vermont drive is too narrow to support new and existing traffic. Ditto Rosamund Drive.

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Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

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The beautiful town of Woodstock is already straining under the huge numbers of cars, coaches, work vans all competing for space. Building more houses will just add to the problem. Businesses in the town are struggling due to people's inability to park. As this problem gets worse, no-one will try and set up new businesses in the town. We shall become a huge, modern housing estate with a few ancient, redundant buildings in the centre.

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

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I am writing to you with regard to proposed development of land close to my home in Old Woodstock. I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

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In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with
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| MM586         |                         | Nigel Brooke    | -                | Brooke            | 1357       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan. Woodstock needs to plan very carefully on where to build new houses without ruining the town. To choose this field as a place to build 120 houses would be a huge mistake on so many levels.

Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. The traffic increase driving through town towards Oxford would put strain on an already busy road.

Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions being highly inappropriate for everyday safe pedestrian and cycle use.

Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic.

Old Woodstock already has a problem with schooling - Currently at capacity with Hill Rise children not getting in. Where would all the extra children go, Woodstock School is only small.

Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

We could lose the use of the play area and football pitch. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.

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Vermont drive is too narrow to support new and existing traffic, let alone construction vehicles.

Woodstock’s amenities are already at bursting point, the doctors has a two week waiting list and the primary school is at maximum attendance. Without very careful consideration and town planning Woodstock cannot take any more houses and in particular Old Woodstock.

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Vermont drive is too narrow to support new and existing traffic.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

I would also like to add the following:

I have lived in Old Woodstock for nearly 30 years and having taken grandchildren to and from town in pushchairs using the A44 I know how nerve-wracking it can be. In places the pavement and road are so narrow that when wide vehicles pass one another they are only inches from pedestrians. Plus I have noticed in recent years more cars are parking on the footpaths causing people with pushchairs or using wheelchairs are having to step into the busy road to get around them. More people using this very busy route will increase the likelihood of accidents.

The land Northeast of Hill Rise in my view is unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.

Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and a regular route for large vehicles. The documents proposing the site states that it has, ‘effective pedestrian and cycle links to the centre of Woodstock’. Those living here know this NOT to be the case. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. Fear for the elderly, parents pushing buggies, teenagers and children.

Would cause significantly more traffic travelling the whole length of A44 through Woodstock, increasing Old Woodstock by 50%. Residents are likely to travel to work and school having to go through the town. This is not the case for other sites in Woodstock.

Old Woodstock schooling & medical centre - Currently at capacity with Hill Rise children not getting in. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, further increasing traffic concerns. Similar capacity concerns for the medical centre.

Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 2). This is not the case for other sites in Woodstock.
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| MM591        |                         | Angela Keeling  | Mrs Keeling      | 1364      | Section 9 - Strategy at the Local Level > Eynsham Woodstock Sub Area > MAIN 166 | Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

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Removing a valuable piece of countryside from Woodstock that is in regular use by the community. An important portion of the country walk to Woottton would effectively be destroyed. This countryside is widely used by walkers and their dogs.

Strong Old Woodstock community would be destroyed. This has been built up over 20-30 years due to the vicinity of the open space, green walkway, play area, footpath.

Vermont drive is too narrow to support new and existing traffic.

This entrance/exit is additionally used for parking/turning of a double decker bus.

Please consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is unsuitable for development.

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.

Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites.

Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.

Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, 'effective pedestrian and cycle links to the centre of Woodstock'. Those living here know this to absolutely NOT be the case. Old Woodstock just can't take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>I am very much against the proposed housing development behind Hill Rise for the following reasons.</td>
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<td>1. The infrastructure of Woodstock as a compact, unique and historic town cannot take evermore residential development.</td>
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2. In Old Woodstock there are no facilities such as shops, schools, doctors’ surgeries etc.

3. Most people living in Old Woodstock have to use the A44 towards Oxford and the road is hazardous with very narrow pavements, a road which is narrow, hilly and bendy.

4. The A44 is busy enough at the moment and we don’t want any more pollution.

5. Parking in Woodstock is becoming more and more impossible. Even the car park is often absolutely full. Parking is taking place on pavements between Hoggrove Hill and Upper Brook Hill making it difficult to get past with pushchairs.

6. I don’t think we should be building on agricultural land, spoiling the lovely views of the countryside and over a well used path to Wootton. We should build on brownfield sites.

I am trying to remain pragmatic but writing to you in the depths of sadness and probably early stages of depression over the prospects for our historic and natural environment in Woodstock if proposals to build 670 unwanted houses is permitted.

Is the Inspectors call for sites SHELAA methodology and the Councils strategic housing target a sound strategy? Haven’t the WODC been working tirelessly and logically on the Local Plan over many years to come to the conclusions that formulate the 2015 Local Plan? Was a similar plan submitted in 2013 not rejected? It does not surprise me that all three sites offered in Woodstock are owned by the Blenheim Estate and it is extremely worrying that this SHELAA process has no public consultation or Environmental Impact Assessment before delivery.

The key reason for revising the draft local plan is that Oxford City Council are unable to provide sufficient land for future housing in order to meet the government quota up to How can it possibly meet strategic and sustainable development criteria if Oxford overspill residents are forced to travel 12 miles into Oxford and spend at least an hour in a car, on a bus, or combination of both? Wouldn’t it be preferable to put employment and housing closer to allow people to walk or bike to work? It already takes an hour to travel to Abingdon from Woodstock. I have no doubt that traffic levels are increasing year on year. Commuters are traveling further and starting their bus and car journeys earlier and earlier just to hold down a job and levels of noise; carbon monoxide; and speeding vehicles are already damaging the character of the town and making living along the A44 Manor Road intolerable.

With a strong populist reaction to the government over Brexit I am certainly questioning the whole ‘top down’ soviet planning target system just as much as the lack of direction and sense of responsibility taken by our Woodstock Town Council in not buying into the ‘Community Plan Process’ until too late (the Vision for Woodstock 2050 now sounds a little over ambitious). The Local Plan is set to condemn us to today’s statistical assessments and today’s political prejudices until 2031!

We are told one thing about the exciting prospect of local governance and the opportunity for local communities to determine their own planning issues and then hear and witness all number of arguments to reduce public spending and services and now we get the SHELAA process. SHELAA puts a gun to our heads and provides an opportunity for fat cat commercial exploitation in place of local authority planning and strategic decision making. What happened to the joined up thinking movement? The Big Idea and Big Society Agenda? The Localism agenda? And now with the revolver at our heads where is the debate, where is the local representation here other than pleading foul to you?
A golden opportunity is being squandered in not providing and delivering a Woodstock, or even an Old Wood stock scale Local Community plan to establish positive economic and sustainable solutions, positive rather than a negative strategies rather than a now conditioned rejection and dismissive attitude towards any sort of development per se? Where are we on even simple local issues like a new surgery, school and local sports pitch provision, the traffic and safety conflicts at the school gates, the lack of parking for our new even more expensive co-op, the crazy 2 way traffic flow in the town centre that makes sitting in the warm more attractive with every circuit and makes shopping less attractive and spending less likely ... nothing gets done!

We are removing the development of strategic environmental planning and design guides to ensure local distinctiveness and we are offered what a Community Infrastructure Levy (CIL). Cynically, a never to be fulfilled bribe, designed to make up, compensate or plaster over the years and years of lack of investment in roads, schools and local health facilities. To help us turn right at the new roundabout and soften the imposition of our new neighbours at the end of the garden where there were previously unrestricted views across to Brill. Brill in Buckinghamshire across the Glyme Valley where they have a very informative Historic Towns Assessment?

Over the past 30 years I have witnessed an increase in through-traffic, the consistent erosion of Open Space, loss of sports faculties, loss of informal recreation access and an overburdened local surgery. The increase in buy to let and rented short term living and long distance commuting has contributed loss in community spirit and a disillusioning disconnect between the town and the Blenheim Estate. How on earth will another 670 houses and doubling the population improve existing local resident’s lives? The Blenheim Estate hosts larger and seemingly more numerous events. Officially the Palace has 525, 000 annual visitors (The Guardian 2010) and the town and residents are subjected to all sorts of temporary traffic constrictions that make accessing Heathrow Airport seem like a breeze. This historic town is creaking under this pressure of cars and lorries and the 900 vehicles an hour that come through every hour. The buildings on Manor Road are crumbling and blackening under the pollution and must be hell to live in when articulated lorries rattle the lampshades at 3:30am! Motor bikes at full throttle come through at 5:30 just as you get back to sleep! Manor Road is starting to look less chocolate box and more like the North Circular Road.

This is a Market town with a high level of International tourism, yet it has struggled to keep its shops. There are obviously many more ways and places to spend your money but I believe the inconvenience in parking in the town doesn’t help. Wood stock town centre is quite honestly in need of a public realm up-lift if it is truly to represent ‘the gateway to the Cotswolds’ and stage a World Heritage Site.

Local scale determination in line with ‘The Coalitions’ proposed planning revolution. The Woodstock Local Plan should already be in place and should have involved the whole community by gathering the views and opinions of as many groups and organisations in the community as possible. There is some retro fitting necessary in Historic Woodstock but in a ‘so called’ civilised and economically savvy society such as ours why do we not start with infrastructure first. Instead we see piecemeal opportunism that caters for and fails to reflect the specific needs of both future and existing communities. Planned infrastructure and public transport capability of absorbing more people and vehicle movements.

The Local Plan states:
‘Development will not be permitted unless appropriate supporting transport, service and community infrastructure is available or will be provided and appropriate provision has been made to safeguard the local environment.’ "The County strategy of directing growth away from Oxford and Central Oxfordshire has over the last two decades placed severe pressures on the infrastructure of the district. Parts of the road system are inadequate and congested with resultant damage to the quality of the local environment. Provision for
pedestrians, cyclists and users of public transport is often poor, and existing educational, community and leisure facilities district-wide are becoming increasingly strained’.

Far from Woodstock fulfilling the aims of the WODC2011 Local Plan it clearly now fails in the aim to protect and improve the town centre in terms of its appearance and the range of services it provides. The ambience and look of the Town is being damaged by traffic congestion, noise and pollution issues. The condition of the streets and buildings is a major concern. Woodstock Town centre should underpin the economic well-being of their town, act as an accessible locations by all means of transport, and function as the cultural and social focus for the town and surrounding area.

So why is there no investment in public realm within the town and continued management of this resource? We are seeing a downward spiral in shop failures and the opening of charity shops and cafes. All leading to a poor image of the town which in turn drives away more businesses and customers. This conflicts with the aim to prevent any loss of vitality and viability in order to protect the important role of our town centre.

How is building over 670 houses 8 miles out of the city going to improve the road congestion and time wasted in traveling around and avoiding the local road network for local people? Why are we locked into this compulsion to buy and consume more countryside, build poor quality housing with built in obsolescence, destroying our environment and generating more rubbish that needs to be disposed of?

If I understand the situation correctly, the withdrawal of the 2015 Local Plan has opened a window of opportunity for increasing WOO housing allocation by 50%. There seems no logic in this figure what’s so ever? Much of this is attributed to the in ability of Oxford City to meet their quota. How makes up the OGB? Should this not be OMG? Why should the rest of the county cover for the housing needs of Oxford? Totally illogical thinking! For my part, if I worked in Oxford it would be more desirable to live in the Wonderful City and walk to work, rather than drive to the park and ride and get on a bus for 3 hours every day? There are over 50,000 students resident and attending Oxford Universities. The answer to solving the housing problems of Oxford is to force and assist the Universities to build their own accommodation and free up the family housing. Enable younger working people to live and work within the City providing desirable, affordable and aspirational accommodation in Oxford at the centre or integrated around the commercial district.

The phrase current government planning guidance requires the WODC to assess the potential suitability for development of sites submitted by landowners should read ‘we are all going to tear up years of Planning Strategy, years of local planning considered and organic thinking in favour of allowing landowners and developers to do the job for us? Throw out the plans of intelligent, qualified and experienced individuals. Throw the country’s green belts and rural communities into the hands of the self-interested and commercial’. How with everything going on in the world are our local administrators so out of touch with public emotion?

The qualities that give our historic towns and cities their distinctiveness and attractiveness also give them a high commercial value to landowners and developers. In Oxford and Woodstock we have historic buildings, woodland, parks and open common land. Obviously there is an appeal to move here from aspirational people and are frequently proposed as sites for “prestigious” developments. City-centre projects are dwarfed by “green field fringe” developments on land with cheaper land values around the edges. Towns such as Oxford and Woodstock are expanding because they are pleasant places in which to live, as well as breeding grounds for hi-tech industries. The existing transport links such as the A44; A40 and A34 are some of the worst roads in the country, and they are getting worse. Any further increase in Woodstock’s population will lead to infrastructure overload, the desecration of Wood stock and Oxford city centres and a steady degradation of the environment and the public realm through Wood stock, Summertown and along the Woodstock Road.
Now great swathes of the rural green belt have been converted into development land to advance these growth plans: in a more permissive planning climate, its continued erosion will be even harder to resist.

SSSI- Natural England have highlighted the Site as a ‘High Priority Wildlife Package Area’. There will be an obligation to assess the application for its likely impact on the SSSI and the LPA should consult Natural England’s Magic Web site. Currently as I would like to think we are a democratic country, The Blenheim Palace wall mysteriously dictates the boundary of our nationally identified designated Site of Social and Scientific Interest (SSSI). Hope the birds and animals have read this or seen the website and respect the 50m from the Estate wall, boundary to the designated World Heritage Site, and SSSI designation situated on the top of the high Cotswold plateau and the Glyme valley slope. And I am sure it’s safer to be on the outside of the wall when they get gun happy over there! The core centre of the SSSI is the sheep dip at The Black Prince Causeway. This is 500 m from the Site but is only part of a natural continuation of the water meadows, Glyme River Valley and Valley catchment area.

Any further housing development along the Glyme Valley will impact on the SSSI and on the natural Glyme Valley Environment. Ironically there will also be a negative impact on the wildlife and biodiversity moving across the A44 and in and out of the Estate.

We have frequent visits to the garden and above from: Barn and Tawny Owls; Deer and monk jack; Badgers and Foxes; Red Kite; Buzzards; Kestrels; Sparrow Hawks and all feed in the field. Herron; Green and Lesser Spotted, Green and Great Spotted Woodpeckers; Lapwing and Skylarks nest in the field; Song thrush, Mistal Thrush and Blackbirds frequent the garden as do Coal, Long-tail, Blue and Great Tits; Field Fare. Redwing are winter visitors to the apple tree. Swifts, Swallows and House Martins forage over the field through the summer. Crows; Jackdaw and Magpie together with Pheasants and Partridge and Woodpigeon are common in the field. Toads and Hedgehogs are garden visitors. The RSPB have given their expert knowledge and designated the Glyme Valley as flood plain grazing marsh habitat. There are over 44 wintering birds recorded.

Nature Conservation and Biodiversity - the law has never been generally effective in giving adequate support to Nature Conservation. Ecologists and Planners are under ridiculous pressure. But, planning guidance on Nature Conservation makes it clear that Nature Conservation Should be a material consideration in planning a new development.

Historic Landscape - there is the potential to lose a valuable part of our local landscape and history. The field is part of a wider open Cotswold landscape that links Wootton with Woodstock. The field is adjacent to the palace walls built to retain the medieval deer park hunting grounds. The setting of the Park and the surrounding countryside are integral to Capability Brown’s late 18 Century Romantic Landscape Design but in many ways represent a far older untouched Agricultural landscape. There are clear indications of historic routes between Wootton and Wood stock and it is suggested from authoritative source that the Public Right of Way is the route of religious trail linking parish churches. Numerous views were planned to look into and out of the park. The wider landscape is more indicative of the medieval royal hunting park of Henry 1 (1100-1135). A full Archaeological Assessment should be undertaken. There is clear indication of Victorian tip in the eastern corner of the site and Roman and Anglo Saxon ditches either side of the site suggest it has massive archaeological potential.

Landscape Value - this Site is typical of a Cotswold Landscape and is on the edge of a conservation area. There are many nationally important estates bordering the site.

* Blenheim Palace
* Kirtlington
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* Kiddington
* Ditchley
* Rousham

In many ways the ancient and natural Glyme Valley landscape with its valley side water-shed catchment sits within the 18 Century modified North Oxfordshire Estate landscape and must be preserved to offer both a natural and biodiverse environment and a visual contract in agricultural landscape.

Once destroyed and buried under brick this more natural Cotswold limestone transition of agricultural linking Woodstock to the broader rural countryside and linking up with the Oxfordshire Estates can never be replaced. There should be an independent Environmental Assessment and landscape Character Assessment to preserve the Rural Cotswold landscape and establish a cohesive and sustainable long term the cohesive planning vision. The Natural Environment is NOT A SUBJECTIVE ISSUE. The preservation of our wildlife and the promotion of sustainable development is imperative for the benefit of future generations.

Enough is enough. There is no more justification in preserving Port Meadow and Marston Common than there is in preserving the Glyme Valley. Population projections are too much of an oversized hammer to older historical environments such as Oxford and Woodstock.

To sum up: There should be no further residential development in Woodstock since it has met its housing quota and as a long-time resident of Old Woodstock, it is my opinion that the Draft Local Plan for 2031 should not show farmland North of Hill Rise as suitable for future development.

The field is not suitable for development for the following reasons:

* Old Woodstock has no shops!!
* Shops in Woodstock are failing. Woodstock is not a well-functioning sustainable shopping environment and infrastructure is being damaged because of traffic.
* Old Woodstock has no infrastructure (shops, school, doctors etc.)
* Older residents are compelled to drive into Woodstock where there is no parking!!
* Woodstock's schools are already over-subscribed and traffic levels around Hensington Road and Shipton Road are already dangerous for school children.
* The volume of traffic using the A44 is very high. Building an additional 120 houses behind Hill Rise will increase not help manage the pollution concerns or accident risk. The number of cars and the cumulative increase in accidents and congestion on the section of A44 adjacent to Hill Rise is clear to see.
* There are safety concerns about the A44 which has extremely narrow pedestrian pavements. There was a recent incident where a van mounted the pavement and seriously injured a pedestrian. It would not be possible to improve cycle and pedestrian links.
* Pollution levels are already unacceptable.
* Access for 200+ more cars onto the high speed A44 north of Hill Rise is blind and dangerous and a link to Vermont Drive would be impossible. It already takes 10 minutes to get out of Vermont Drive and Hill Rise in the rush hour!
* The proposed site will not provide safe and suitable access or exit points for vehicles, pedestrians and cyclists. Old Woodstock is an ancient town. The A44 is incredibly narrow in places and is straining with the current volume of use. We have counted 900 vehicles per/hr for 3 hours every morning and 3 hours every night. At peak times 6 articulated lorries every 10 minutes.
* The land behind Hill Rise has been agricultural for decades and forms the valley side to the River Glyme Valley. The proposed development will adversely affect the wildlife biodiversity habitats which are well established. We are privileged to see bats in our garden and a multitude of summer and winter birdlife that
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<tr>
<td>MM604</td>
<td></td>
<td>Elizabeth Barr</td>
<td></td>
<td>1380</td>
<td>&gt; SECTION 9 &gt; STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I believe that the land north-east of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to flooding reasons.</td>
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<td>- Woodstock is under strain as it is with a small supermarket, school and a doctors to which they are taking no more patients, leading people to travel further afield.</td>
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<td>- The traffic at the moment is horrendous going through Woodstock, with heavy goods vehicles etc. walking from old Woodstock into town down the hill is very scary as it is, there is no way I let my children walk to school, as it is, plus more traffic from the new housing estate would be waiting for an accident to happen.</td>
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<td>- As I resident of Woodstock, trying to park in town is an absolute nightmare unless you get there very early or late at night. Patients for doctor's surgery have to park down by the fire station and that car park is barely big enough as it is!</td>
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<td>- The land behind Hill Rise and Vanburgh Close is used by many walkers exercising their dogs, one area where you can let a dog off the lead! The play area is the only one up that end used by many children, that would be gone! The football pitch is used not only by the children, but by clubs elsewhere!</td>
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<td>- The wildlife would also suffer, many rodents, birds live there, it would be destroying their habitat. Plus many wild flowers grow there - endangering them. We all need an area to learn, explore through wildlife!</td>
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<td></td>
<td>- As a resident in Vanburgh Close, there is no way I would want more traffic coming into Vermont, then</td>
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will be lost if this habitat is destroyed. Throughout the year the field and the Glyme valley are host to wintering feeding and summer nesting birds.

- Removing a valuable and much loved piece of countryside from Old Woodstock would be Intrusive and very damaging to the Hill Rise Community in particular. There is every chance that Old Woodstock might become a DEAD satellite residential estate with no social and community cohesion.

- The field is essential to the way that people connect and integrate with the wider countryside and footpath system north of Old Woodstock. The footpath running through the proposed site is an ancient Public Right of Way that links the Parish of Wootton with Woodstock. Hill Rise was until 1970s part of Wootton and from various locations along the footpath it is possible to see the Parish Churches of Wootton and Woodstock and for that matter the Palace form the field.

- Local road infrastructure is already at breaking point. Traffic at the school gates is already extremely dangerous because of the narrow roads and necessary large coach transport. The recent housing development at the back of the Marlborough School (Marlborough Place) has exacerbated the problem and conflict of vehicle movements at peak times and has become extremely dangerous to school children and pedestrians.

- There are 46 houses on Hill Rise, 120 unwanted house would swamp our community and make life intolerable. The town is not equipped to service the needs of such a drastic increase in population. There are few shops, one bank and only one grocery store. The Drs Surgery is difficult to access with the present population.

- Why is necessary to develop Woodstock further? Marlborough Place and Banbury Road are recent development and have met the housing quota.

- Morally the proposal is wrong. It is unacceptable that the landed gentry can change the character of such a historic town in order to generate money for their estate. The people of the town will be living this legacy not the social elite.

- There are some valuable views from Hill Rise across the Glyme Valley and also from the field into Blenheim Park. A key view along the public right of way running through the proposed site encapsulates Blenheim Palace and the St Mary Magdalene Church in Woodstock.
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| MM605         | Woodstock Town Council  | Mary Ayres      | Mrs Ayres        | 1381               |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | Vanburgh plus the roads are too narrow to carry more traffic, it's bad enough when the bin men come, blocking 3/4 of the road, what about emergency vehicles, with residents parking on roads, they can barely get through as it is!!
I strongly disagree to 120 new homes it would ruin Woodstock as it can't cope with the people it has at the moment! And I personally think it would be disastrous for the residents. |

| MM623         | Woodstock Town Council  | Colin Carritt    | Mr Carritt        | 1418               |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | Neither the main plan nor the modification provides 'satisfactory vehicular accesses, and pedestrian or cycle connections.'
1. Few of the inhabitants of any new housing would be employed in Woodstock, most travelling to work in Witney, Oxford, or destinations beyond Oxford. Almost all these journeys would be by car along the narrow A44 through Woodstock and past Blenheim Palace.
2. Since Old Woodstock has no infrastructure of its own, such as primary and secondary schools, shops, GP surgery, post office or community hall, all residents have to use those of Woodstock Town. For pedestrians, particularly children on their way to and from school, parents with children in pushchairs, the elderly, and the disabled, the walk from the Hill Rise area into Woodstock is both hazardous and frightening. There is concrete evidence to show that in the area of Manor Road the kerb-to-kerb width of the A44 is insufficient to allow lorries of legal maximum width to pass each other without overhanging the pavement, which in some places in less than a couple of feet wide, thus forcing lorries perilously close to pedestrians.
Between Manor Road and the Black Prince pub, pedestrians are confined by high and crumbling walls on both sides of the road. Near the Black Prince they are protected only by a flimsy metal barrier from the many heavy lorries and buses which use this road, some travelling downhill well in excess of the legal speed limit.
3. Walking and cycling benefit from both health and the environment, but the journey from Old Woodstock to Woodstock Town is far safer by car, encouraging residents to make unnecessary car journeys. A new footpath and cycle way into Woodstock would seem to be a solution to this problem, but it would have to cross not only the river Glyme but also a wide stretch of water meadows, including the protected Woodstock Town Watermeadows. Moreover, for safety reasons, it would have to be very well lit, thus introducing light pollution to an environmentally sensitive area.
4. If the proposed new development and the existing housing in Rosamund Drive, Vanbrugh Close, etc., were to share a single entry/exit point to the A44 into Vermont Drive, a potentially hazardous situation arises in the case of emergency. Thus, a second exit onto the A44 would be needed, probably a roundabout on the A44 in the Hill Rise area. This change to the A44, plus the building of a lengthy cycle/pedestrian into Woodstock Town - not to mention the provision of some kind of infrastructure to serve only a couple of hundred households - would make the development of the land to the Northeast of Barn Piece a very expensive venture. |
I support the allocation of 670 new homes in Woodstock over the plan period. However, the distribution and location of those homes must be jointly, agreed between WaDC and CDC and in further consultation with the local community. It could mean all 670 homes being built on the Woodstock East site (part within WODC and part within CDC) or the total allocations could be split between the sites identified in both COC's and WODC's proposed modifications.

I support the allocation of 670 new homes in Woodstock over the plan period. However, the distribution and location of those homes must be jointly, agreed between WODC and CDC and in further consultation with the local community. It could mean all 670 homes being built on the Woodstock East site (part within WODC and part within CDC) or the total allocations could be split between the sites identified in both COC's and WODC's proposed modifications.

I believe that the land Northeast of Hill Rise is unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan. As a resident who moved into Old Woodstock relatively recently, I have been surprised and concerned with the size and number of HGV vehicles along the A44, often at speeds wholly unsuitable for the width and condition of the road on which they are travelling.

We live on Manor Road and there have been a number of reports of trucks mounting curbs and pavements. A new housing development will surely only increase the number of large vehicles using the road and thereby the amount of curb-mounting incidents.

This is not only very worrying for my family, but I would imagine for other families in the Old Woodstock area, particularly those with smaller children and prams. As an ecologist, I can't help but be worried for the future of the resident skylarks, (Alauda arvensis), a wonderful sound and sight to anyone who has walked along the trail from Woodstock to Wootton. This is a species that relies almost entirely on farmland for nesting and breeding, and has seen a significant historical decline in its UK population.

In fact the RSPB have placed the skylark on its Red List due to: "the severe (at least 50%) decline in UK breeding population over last 25 years, and the severe (at least 50%) contraction of UK breeding range over last 25 years". It would be a great shame to be seen to be contributing to the continued elimination of this flagship summer species.

These are a couple of my concerns why I believe the site is unsuitable, and I do hope that you will be reconsidering your plans.

I am concerned about the plan to build behind Hill Rise.

1. The road into Woodstock town centre is a busy, narrow and hilly and would have considerably more traffic.
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| MM491 Crest Strategic Projects Crest Strategic Projects | Crest Strategic Projects | - | Crest Strategic Projects | 1599 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | Delete | 4) Policy EW1d – land north of Hill Rise, Woodstock

Policy EW1d: We support the allocation of land north of Hill Rise, Woodstock for around 120 homes.

A requirement to ensure no harm to heritage assets is in direct conflict with national policy, which establishes in Chapter 12 of the Framework that less than substantial harm to a heritage asset should be weighed against public benefits arising.

Hill Rise is a sustainable site in a sustainable location. Its development will contribute towards the sustainable growth of Woodstock and provide for much needed housing in the area.

Together with other sites allocated for development around Woodstock, the development of this site will make a major contribution towards the improvement and enhancement of local infrastructure and result in significant social, economic and environmental benefits.

The site is readily available and there are no significant constraints to development. Consequently, it will be delivered during the Plan period. Also, as above, there is an opportunity for the sites allocated around Woodstock to be linked together, as they are all in one ownership. This presents the opportunity to deliver a joined up approach to the delivery of infrastructure and services, to further enhance the long term sustainability of the settlement.

The land around Woodstock is owned by Blenheim Estates. Blenheim is an integral part of Woodstock and has been for many Centuries. Blenheim Estates adopts a multi-generational approach to all of its land and property – as can be seen by the exceptional land management and the sensitive Blenheim Estates

If the houses were built. Most people would be travelling towards Oxford and would cause more congestion and pollution in Woodstock centre.

2. The infants school is already turning children away because there are no more places, so there would be more travelling towards Oxford and pollution.

3. There are no shops, schools, surgeries in Old Woodstock so more traffic on the road into the town centre.

4. Vermont Drive is far too narrow for increased traffic and it would disturb the way of life for those living there.

5. Good agricultural land should not be built on while there are other alternatives, such as brownfield sites.

6. Parking is sometimes impossible in Woodstock, even in the carpark. Another 120 homes would make it much worse.

These are some of the reasons I am against the development.

| MM721 The Blenheim Palace Estate | - | Neilson 1628 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | | | |
developments throughout the area.

This is a fundamental point. This site, together with others around Woodstock, can be brought forward in a manner which ensures associated investment into all of the things that make a place sustainable. It is in Blenheim Estates direct interest (and forms the reason for its existence) to invest into Woodstock. The success of Woodstock and that of Blenheim are intertwined.

Blenheim Estates is well placed to ensure that development will be brought forward to enhance the sustainability of Woodstock as a whole. Piecemeal development will be avoided and the combined development of the allocated sites will result in major investment into local infrastructure, facilities and services. For example, a 200 house development could only make a contribution to education, whereas, together, the delivery of say, 770 dwellings, can ensure the provision of a new primary school. This approach can be adopted to all manner of things and given that Blenheim Estates has other strategic landholdings within Woodstock, the allocations can help to release associated opportunities – for example, new community facilities in the town centre and new community facilities for the historic, but threatened, Woodstock Football Club.

Blenheim Estates has many years of experience as a progressive landlord and intends to become a significant provider of affordable housing. This, combined with the Blenheim Estates’ record as a provider of developments of the highest design quality and exceptional property management, will help to ensure that the land allocations support a long term legacy, enabling people of all backgrounds to enjoy the unique characteristics of the area.

There are too many examples across the country of where housing developments fail to provide the comprehensive investment into services, facilities and infrastructure necessary to ensure sustainability. The land allocations at Woodstock provide an exciting opportunity to place sustainable development at the heart of the planning process. They are to be welcomed.

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<tr>
<td>MM763</td>
<td>W &amp; R Hutton</td>
<td>Unknown Hutton</td>
<td>1985</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>Our client supports the Council’s position that smaller ‘non-strategic’ allocations can help to ensure a deliverable housing supply in the short-term. Accordingly 15 ‘non-strategic’ sites are proposed for allocation at Paragraph 5.30b, resulting in a potential supply of circa 1,700 dwellings. Of these, land north of Hill Rise, Woodstock has been identified as a proposed allocation for the provision of 120 dwellings. Our Client supports the allocation of land within Woodstock which is identified as a Rural Service Centre and therefore, is one of the most sustainable settlements within the District. The content of paragraph 9.5.41q (MM 164) identifies that the there are landscape sensitivities which relate to the site and that any scheme would need to incorporate landscape mitigation measures. In this regard it is noted that the proposed allocation identified in MM 165 does not follow any natural boundaries but follows an arbitrary line within a larger field. To minimise the landscape impact of the development the boundaries of the allocation should be extended to the natural boundary line therefore ensuring that maximum screening can be achieved. Furthermore, our Client owns land in the vicinity which could be used to provide additional landscaping and/ or open space to maximise the development potential of the allocated site.</td>
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<tr>
<td>MM77</td>
<td>GDB</td>
<td>Mr Bird</td>
<td>215</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt;</td>
<td>The modification is unsound as the site proposed for potential development is unsuitable. Access to the Barns Piece estate is limited and problematic for vehicles, cyclists and pedestrians - the development will encourage more vehicles to use the A44 into Woodstock town centre, channelling traffic through a pinch point in the A44 at Manor Road/Farm End. This will increase the dangers to pedestrians in particular given that the pavement is exceptional narrow at this point. There is no existing access to the proposed site from the A44 or from the residential area at Rosamund Drive/Vanbrugh Close. The introduction of housing adjacent to the estate will increase car movements, increase noise, light and air pollution and result in an overall diminution of quality of</td>
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The proposal is also on a green field site in an area of landscape value identifiable for populations of red listed birds of conservation concern (skylark and yellowhammer). The proposal will result in the loss of recreational resource as the playground/football pitch and footpath are used by children and family groups, sporting groups, walkers and runners.

Ecology and Natural Environment

In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

Woodstock – Land North of Hill Rise

The site is adjacent to the Glyme Valley Conservation Target Area.

There may be hydrological issues relating to Glyme Valley and downstream the Queen Pool SSSI and Woodstock Water meadows.

There will be a need for additional investment in Woodstock Water meadows to ensure the site is able to meet the increased recreational access demands this development would generate.

Policy EW1d (following 9.5.41r)

c) provision of satisfactory vehicular accesses and appropriate pedestrian and cycle connections including appropriate accommodation of the existing public right of way through the site.

The land northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

* As residents are likely to travel to work and school this would cause significantly more traffic travelling on the A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. This is not the case for other sites in Woodstock. It is already very difficult and dangerous getting out of Vermont Drive during busy times and people also have to cross the roads.

* Existing parking problems in Woodstock and on the Old Woodstock estate would be made much worse. Driving is mostly used to get to Woodstock as there are narrow pavements and poor cycling conditions due to very busy traffic.

* Old Woodstock has no infrastructure such as schools, doctors, shops etc, which means all residents have to travel into town on the already very busy A44 daily. Any extension would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, 'effective pedestrian and cycle links to the centre of Woodstock’. This is absolutely NOT the case. Old Woodstock just can’t take any more residential traffic, as well as at least a year of construction vehicles. There was a serious incidents last year of a van mounting pavement seriously injuring a
teenager and on Thursday 3rd November 2016 a Golf appeared to have been hit near Hill Rise, with police in attendance. All police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions and fear for our elderly, parents pushing buggies, teenagers and children. I personally have nearly been hit by a van wing mirror while walking down the hill from Old Woodstock towards the pedestrian crossing. The pedestrian crossing is also very dangerous with cars regularly not stopping.

* Old Woodstock already has a problem with schooling. The primary school is already at capacity with children from Old Woodstock not getting in. More homes would mean a significant increase in primary children and an increase need for pre- and post-school childcare. The local WUFA already has waiting lists which has effected the time I can get to my work. Placements at other schools would only increase the amount of car travel in the area.

* Current pollution levels on the A44 need to be measured before extra traffic can be handled.

* We would lose the use of the play area and football pitch for at least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and the greater Woodstock community. The playground is used by my family every weekend and was one of the reasons I purchased the property.

* Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. In addition so near to the world heritage site Blenheim Estate wall. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. Wildlife would also be effected. No carefully considered development would be able to avoid these repercussions. The historic views would be altered. The view from my properties bathroom was the main reason I purchased my house.

* Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children.

* Vermont Drive and Rosamund Drive are too narrow to support new and existing traffic.

* I would be very nervous in letting my children play outside at the front of my property due to the increaser in traffic and the chaos that would ensue with increased traffic going to the building site.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering overcrowding and pressure on the local amenities; its infrastructure cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

**I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:**

- Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.
- Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites.
- Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.
- Would worsen already serious safety concerns of the A44 which has extremely narrow pavements.
and very fast traffic. The documents proposing the site states that it has, 'effective pedestrian and cycle links to the centre of Woodstock'. Those living here know this to absolutely NOT be the case. Old Woodstock just can’t take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

• Old Woodstock already has a problem with schooling: Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake= only 105 more places. 670 more homes= 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.

• Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

• We could lose the use of the play area and football pitch for at the least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.

• Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

• Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

• Vermont drive is too narrow to support new and existing traffic.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

• Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.

• Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock.

• Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.

• Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, ‘effective pedestrian and cycle
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<tr>
<td>MM113</td>
<td></td>
<td>Jamie Harrison</td>
<td>Mr Harrison</td>
<td>282</td>
<td>9-9-9-166</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I would like to express my views, objections and representations on the proposed modifications to the West Oxfordshire Local Plan 2031, with particular respect to the proposals for Woodstock. I live in Old Woodstock with two children of primary school age and find the amount of housing proposed in Woodstock to be wholly inappropriate given that it represents an increase in housing of approximately 50% of the current size of the community. With regard to Woodstock, heavy traffic on the A44, lack of parking in the town, lack of facilities such as schooling and health provisions and the distinct lack of, and lack of planning for improvement of the infrastructure, are highly significant problems for the town. The town is currently at full capacity with regard to these issues. Of particular concern to me, is the land North of Hill Rise. I believe it is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons: 1. No Infrastructure/more traffic on A44 Old Woodstock has no infrastructure (shops, school, health etc), meaning all residents have to travel links to the centre of Woodstock'. Those living here know this to absolutely NOT be the case. Old Woodstock just can't take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children. Old Woodstock already has a problem with schooling- Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake= only 105 more places. 670 more homes= 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns. Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels. We could lose the use of the play area and football pitch for at least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community. Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree. Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years. Vermont drive is too narrow to support new and existing traffic. In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.</td>
</tr>
</tbody>
</table>
into town on the busy A44 for everyday things. Further houses would mean more cars and pedestrians on the A44. The majority of residents travel to work and school at the other side of Woodstock requiring them to travel South using the A44 through the town. Likely destinations such as Woodstock, Oxford, Oxford Parkway Station, Marlborough Secondary School, Woodstock Primary School and also schools in North Oxford, Kidlington, Long Hanborough, Witney and Eynsham all require residents to travel on the A44. More traffic would increase the already busy A44 and further exacerbate difficulties at specific points - e.g. at the Hensington Road junction and in Shipton Road during school and rush hour travel times. The recent collision of school buses outside Marlborough School is an example of this issue.

2. Pedestrian Safety - A44 - NOT- 'a comfortable' or 'effective' pedestrian and cycle link/route. Any houses built on the Land North of Hill Rise, would increase the number of pedestrians walking along the main A44, to get to town and both the primary and secondary schools. Walking on the pavements of the A44 into Woodstock is hazardous. Lorries and buses travel over the speed limit very close to pedestrians and often struggle to pass each other. Of significant note is the teenager who was knocked down last year by a van mounting the pavement, resulting in serious head injuries. Traffic police recognise the problem as they are often seen opposite Hill Rise doing speeding checks. The route is used by mothers with young children and buggies walking to the primary school and/or playgroups in the town, and teenagers walking to Marlborough School. There is a bus which - whilst helpful for those with bus passes, single journeys and more time - is expensive and impractical for those making numerous journeys per day and at specific times. The footways on this stretch of road are already inadequate to provide safe walking access from Old Woodstock to Woodstock, with no adequate means of making them sufficient or for providing traffic calming measures.

3. The Character of Woodstock Town suffering due to lack of parking
More residents in Old Woodstock would increase parking in the town. The character of the town is suffering greatly due, in part, to lack of parking for shoppers and visitors. Residents from North of Hill Rise are more likely to drive into Woodstock (especially as the A44 is hazardous - noted above) exacerbating the already problematic parking issues in the town.

4. Infrastructure - Woodstock Primary School
Woodstock Primary School has increased its intake from 30 per year to 45. I have witnessed the expansion of the school yet I see the situation has arisen again, with children in Old Woodstock not sure they will be able to get into the school, with neighbours moving away from Hill Rise and closer to the school for this reason. This, I assume, is partly due to the building that has, and is happening closer to the school at Banbury Road and behind the Marlborough School. Woodstock school Primary School is now at capacity and has approx. 300 pupils. 670 new houses may equate to perhaps 250-300 more children (of all ages, and depending on the type of dwellings built etc). The natural expansion of the school would be to a two year intake of 60 (just another 105 places), but this would soon not be sufficient for even a fraction of the proposed houses. With regard to Old Woodstock, as it is farthest from the school many children from Hill Rise, Barn Piece estate AND any new houses built on the Land North of Hill Rise may be unlikely to get school places within their own community - as the situation stands. An impractical and unfortunate situation for the children and families, but also further adding to the traffic on the A44 as parents would need to drive to villages further afield.

From my visit to the public exhibition and from talking to WODC officials, it is clear that little or no planning has gone in to providing any improved infrastructure to take in to account the planned 50% expansion of the town, in terms of schooling, health provision, parking and highway improvements. Without this the town, which already struggles in these aspects, will fail to cope with the expansion.
5. Character of the Area and Community
Houses built on the Land North of Hill Rise would have a detrimental effect on the wonderful community that has built up over many years between Hill Rise and Barn Piece Estate. There is a strong community life that has been brought about in part by the open space and natural links of the land north of Hill Rise. It is a special and sought after place to live for that reason. The play park, football pitch, woods, footpath, field view and grassy walk create a safe and sociable outdoor space for children, elderly, families, runners, walkers, tourists and dog owners. From verbal reports, photographic evidence and historical maps it has been this way for over 30 years and continues to grow stronger with an summer fete, BBQ's, Halloween party and other social events. The space and community life play an important role in the support, security, health and wellbeing of its residents, and the space is in use by dog walkers and walkers from 5.30am and then is in continual use until the evening, and into the late hours of the summer months.
Please take these views in to account when considering the proposed changes to the 2031 Local Plan.

I would also request that you notify me at the above address of the following matters:

1. The submission of the Local Plan proposed modifications for independent examination;
2. The publication of the recommendations of the person appointed to carry out an independent examination of the Local Plan under Section 20 of the Act;
3. The adoption of the Local Plan.

I write to express my concern regarding the proposed development of the land Northeast of Hill Rise for housing.

is wholly unsuitable for development.

I fully accept the serious need to build more homes in this country but am convinced this proposal is detrimental to the town on Woodstock. I believe this land should not be included in the West Oxfordshire Local Plan, due to the following reasons:

● Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.
● The development would cause significantly more traffic travelling the whole length of A44 through Woodstock.

Residents are most likely to travel to work and school through Woodstock to the detriment of the town and its residents.

The narrow pavements, narrow main road and congestion are a danger to public safety - this danger should not be increased.

Any development should be on the South side of the town.

● Old Woodstock already has a problem with schooling - the development would necessitate the construction of another school.
300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.

- Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

- We could lose the use of the play area and football pitch for at least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.

- Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

The strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

Thank you for the opportunity to take part in the consultation on proposed changes to the West Oxfordshire Local Plan, as outlined in your letter of 15th ultimo. I am writing to object to the proposed inclusion on the plan of the land north-east of Hill Rise in Old Woodstock. Specifically:

4.77 Policy EW1c Land East of Woodstock; Policy EWd Land North of Hill Rise, Woodstock; Policy EW1e Land North of Banbury Road, Woodstock: These 3 new Policies provide for smaller non-strategic site allocations in Woodstock. Land east and north is close to the Blenheim Palace World Heritage Site with potential negative effects for its setting but site specific requirements provide mitigation measures, together with other Plan Policies including EW1 and EH7. Positive effects found for housing and communities. Although each non-strategic site allocation is relatively small, there is the potential for them to contribute to cumulative negative effects for landscape and transport in this sub-area – with uncertainty in the longer-term and until further detailed project level studies have been completed.

120 houses will seem tiny when the District is being asked to find space for so many new houses to meet relentless government targets, and to bear the burden of Oxford City’s ‘unmet’ targets etc. But to me, this means a fundamental degradation of my quality of life, the loss of a core definitive aspect of Old Woodstock, having bought the last house on Rosamund Drive, by the Play Area, specifically because of its location on the edge of the field. Living in Old Woodstock is defined by the residential areas of Manor Road, Hill Rise, and the Barn Piece Estate - and its much-loved field. To build on it would be greatly to Old Woodstock's detriment.
I believe that the 'Assessment of Effects' set against SA Objectives, as set out in the 'Eynsham-Woodstock Sub-Area' section of WODC Local Plan: Proposed Modifications: SA Addendum Report, Appendix V SA Non-Strategic Site Options is blithely over-optimistic in seeing 'positives' and employing bland generalizations (the same answers as for other tracts of land that it is proposed to include in the Local Plan). This is in part because it identifies 'positives' for as yet non-existent potential residents of newly-constructed homes, as opposed to focusing on the 'negatives' for those already resident in the area, thus creating an entirely false sense of overall positive effects. For example, it considers (presumably) energy-efficient new homes as having 'potential to incorporate energy and water efficiency measures as well as renewable energy' when I would argue that any development on the site inevitably contribute to climate change – any human activity on a field is going to do this! – thus conjuring up another dubious 'positive'. I also dissent from the prejudicial logic of the 'Assessment of Effects' document. It constantly argues that any new development would (it is supposed) commensurately provide, or augment existing, facilities and infrastructure. That's not an argument likely to persuade people to welcome it; firstly, such improvement in facilities and infrastructure may not happen, or happen to a sufficient degree, and secondly, those of us who have no complaints about the current level of facilities and infrastructure are hardly likely to be wowed by the prospect.

Staying with the Appendix, this development will not do anything to 'Improve Education and Training', while it will certainly have an adverse affect on road congestion and use of the dangerous main road – the only route for cars and pedestrians alike. The 'permanent loss of Greenfield land' is for me a catastrophic negative effect, not a 'minor' one. This development manifestly does nothing to 'Conserve and enhance landscape character and the historic environment', and I don't know how the destruction of this field can be construed to have potentially a 'residual neutral effect'. It is vital to understand that land surrounding Blenheim, though not part of the hallowed UNESCO World Heritage site and AONB, is the vital backdrop to it. The approach to the historic town and the famous park and palace relies for balance on open country framing the Park's shelter belt and surrounding wall. No development, no matter what efforts are made to conform to Policy EH7 regarding 'conserving and enhancing the special character and distinctiveness of the historic environment' can perform this role as perfectly as an area of open countryside!

To be more specific, I object to the proposed inclusion of this land on the following grounds:

* The existing Barn Piece estate that abuts the land proposed for development has 112 houses, and the proposed new development would more than double that development, making Old Woodstock a much more crowded area, taken together with Hill Rise and Manor Road (a further 170 existing houses). The traffic levels through the Barn Piece Estate and my road, Rosamund Drive, and on the A44, would become much worse, for drivers but also for pedestrians. The busyness of the A44 is already a concern, and the estate is getting busier, and is now being used as a turning area for Stagecoach and Oxford Bus Company services.

* The proposed access to the new development is via Vermont Drive is also the only access to the existing Barn Piece estate, and a bus route and terminus. It is a residential road, about 100 yards long and 17 feet wide. Vans, lorries, coaches and cars often use the Rosamund Drive and Vermont Drive junction to reverse and turn back towards the town. At busy times, when residents are leaving for work or returning home, Vermont Drive and this junction already cannot cope with existing levels of traffic. Vermont Drive is too narrow to support both existing traffic and the extra traffic the proposed development would bring.

* Old Woodstock has no infrastructure (no shops, no schools or doctors etc) and the proposed site is approximately one mile from the town of Woodstock, accessed only by the busy A44.

* Footpaths bordering the A44 between Old Woodstock and Woodstock town are narrow, and pedestrians, including mothers with pushchairs, often seem at risk from heavy vehicles and fast moving traffic. Pedestrian
and vehicular traffic from the proposed new development would increase safety concerns considerably. I have been hit by a van wing mirror and witnessed many worrying incidents on the stretch of road running through Old Woodstock.

* The primary school is already over-subscribed, and children from the new development would be unlikely to find places there, resulting in car journeys to other towns and villages. The Marlborough School is almost 2 miles from the proposed site, approached only by the A44 and the town centre.

* These aspects alone – lack of infrastructure, limited safe access to the town and overcrowding of the area - make this site unsuitable for a development of this size.

* The suggestion that another access to the proposed site could be made from the A44 north of Hill Rise seems impractical. The A44 is too narrow to allow for right turning traffic in a 50mph limit, and major alterations to Hill Rise would be necessary to arrange an opening from the very narrow service road there.

* The children’s play area at the end of Rosamund Drive, now intended for closure to give access to the new development, has a special significance for all Woodstock residents, and will be a tragic loss. In 2013 it was saved from closure when Blenheim Estates purchased the field, following strong local protest and newspaper coverage. It seems unlikely that the play area, together with its associated half-sized football pitch for children, can be re-located within the new development so as to be as accessible and popular as it is now.

* Above all, the new development would remove a piece of countryside, with a town to town public footpath running through it, which has become important to all local people, particularly those with houses bordering the field. The footpaths along three sides of the field have been used by local families for decades, as shown by a recent Town Council survey identifying well used local paths. The loss of countryside to Woodstock would be significant and intrusive – this field is like a village green to those of us living in Old Woodstock, and is very much a defining aspect of Old Woodstock’s identity and character. To develop this site would destroy what, for me and my family, is the single most valuable aspect of our Old Woodstock life. The countryside that begins in this field, and the play ground and football pitch facilities, are used not just by Old Woodstock residents, but by people from all over ‘greater’ Woodstock. Also, by walkers who have travelled from further away to begin their journey across Oxfordshire at this well-known gateway – the field northeast of Hill Rise and running directly off from Rosamund Drive, this magical place that is the gateway to the Glyme Valley. In correspondence with the Planning and Sustainable Communities office in 2012 (WODC letter reference 12/01625/ENG), the field was judged to be in ‘open countryside’ and ‘beyond the confines of the town’. This is still the case, and many of us deplore the prospect of losing a field that we use frequently, and which teems with wildlife: pheasant, partridge, deer, kites, rabbits, larks in abundance, and much more.

* The knock-on effects for ‘new’ Woodstock would be significant; traffic levels through the town would obviously rise, and parking challenges would be exacerbated by the arrival of 300+ new residents and their vehicles. There are then the problems associated with schooling that already pertain at Woodstock/Old Woodstock’s current population level.

Thank you for considering these objections. As you will no doubt gather, people in Old Woodstock, and Woodstock generally, are horrified by the proposals for significant development ringing the town and, hopeless though the struggle may be, intend to do our level best to oppose them.

I am writing to express my concerns of the proposed development on the land northeast of Hill Rise. I strongly believe that this site should not be included in the West Oxfordshire Local Plan for the following reasons:

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<tr>
<th>Respondent ID</th>
<th>Respondent Organisation</th>
<th>Respondent Name</th>
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<tr>
<td>MM133</td>
<td>Becky Rogers</td>
<td>Mrs Rogers</td>
<td>Rogers</td>
<td>308</td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
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Old Woodstock has no infrastructure (shops, school, doctors, etc.) so all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.

- Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%.

Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock.

- Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.

- Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, 'effective pedestrian and cycle links to the centre of Woodstock'. Those living here know this to absolutely not be the case. Old Woodstock just can't take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

- Old Woodstock already has a problem with schooling - Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake = only 105 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns and not attending a school which is part of the community.

- Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

- We could lose the use of the play area and football pitch for at least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.

- Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our parents, and children.
community. An important, idyllic portion of the scenic walk to Woottoton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

* Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

I hope I have been able to illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development and these points are taken into serious consideration.

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**MM134  Ben Bazeley Mr Bazeley 309**

I am writing to ask the West Oxfordshire District Council oppose the development of houses on the field next to Hill Rise.

I am a 15 year old student at the Marlborough School in Woodstock and personally know that our school already has the maximum amount of pupils that it can take without classrooms being overcrowded and learning being affected. In addition, I know from people that attend nearby schools such as Bartholomew School in Eynsham that they have the maximum number of students it can take. The influx of 120 houses will not only put pressure on the Marlborough and surrounding secondary schools but the primary school. Woodstock is trying to take as many young children as possible and Bladon have recently expanded to accommodate the influx of children yet it would not be enough.

As a child with both parents traveling to work on a regular basis I very often walk to school and have witnessed fellow pupils almost being knocked off bikes by lorries, buses, cars and coaches. This I fear will increase anyway because of commuters in and out of Oxford city centre but 120 houses with the national average per household being between one and two cars I fear this issue will heighten and the accident toll will rapidly rise. This is a big problem.

As well as causing problems for local schools and roads, The development of houses will ruin a tranquil area home to a diverse range of animals from deer and Muntjac to Barn owls. The Barn Owl is growing rare because of its habitats being lost and I have noticed the surrounding area being home to quite a few barn owls. Not only will the wildlife suffer. Next to the fields there is a small playground for children in old Woodstock this is a great positive as the next nearest playground is 15 minutes away. As a result of the houses being build I fear the park will be taken away and would increase the amount of people walking or cycling to the next park. This could have a direct casual link with my aforementioned statement that the accident rate will more than likely increase. Or rather than people traveling to the next park they would stay indoors and enhance a national problem which is that young children are spending too much time indoors and lacking vitamin D. This causes children to lack this essential vitamin and cause problems on our already struggling NHS.

The history of “Old Woodstock” would be lost because of new development and cause problems on the already busy A44. Traffic is major problem in Woodstock because tourists visit our culturally rich town for history and filmography reasons. The parking in the town is simply too little to accommodate the tourists and current residents and adding to that would cause more problems than it is worth.

Our town has enjoyed years and years of being a town where everybody knows everybody. Especially in old Woodstock. And I fear that if 120 houses were allowed to be built then problems we can’t control would be allowed to grow. Such as accidents, impact of learning and other problems. This could also impact our historic town. As a result this is why I oppose the building of houses near the street of Hill Rise and ask the WODC to stand up to the development of houses with me and other people from this area.
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<tr>
<td>MM138</td>
<td></td>
<td>Caitlin and Layla Gamble</td>
<td>Miss</td>
<td>Gamble</td>
<td>314</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>Please do NOT build houses behind Hill Rise because we won't have anywhere to walk our dog without crossing a road. It will also be a lot harder to get to school and there will be more cars so that will be even more dangerous. Also, we won't be able to see all the nature that we see now and won't be able to play in the football pitch and we will lose our playground where we see all our friends from different age groups and schools.</td>
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<tr>
<td>MM146</td>
<td></td>
<td>Craig Gamble</td>
<td>Mr</td>
<td>Gamble</td>
<td>322</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I am writing with regard to the proposed inclusion in the Local Plan of the land to the north east of Hill Rise Woodstock as a site suitable for the development of 120 new homes. I strongly object to the proposed allocation on the following basis. 1. The site is too far away from the centre of Woodstock where all shops, schools, library, doctors etc are located. Most journeys into Woodstock and to the local schools will be made by cars, increasing traffic on the already busy A44. Walking or cycling down the narrow footpath on the A44 into town is dangerous with young children, especially at peak times for school etc. 2. The development will mean the loss of the extremely well used playground and playing field. Even a temporary loss during any redevelopment and relocation will have a dramatic impact on the happiness of local children. 3. There are insufficient local services in Woodstock to cope with the additional homes. School places are already under pressure, with a number of children in Old Woodstock not receiving places at the local primary school. 4. The land represents the only directly accessible open green space for residents of Hill Rise and the adjacent housing estate. The land is in effect a local amenity and well used by residents.</td>
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<tr>
<td>MM160</td>
<td></td>
<td>Denise Warnock</td>
<td>Mrs</td>
<td>Warnock</td>
<td>349</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons: * Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, which would mean approximately 240 more cars. * Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. * Existing parking problems in Woodstock would be made much worse * Many residents will drive into Woodstock, due to distance and road conditions being highly inappropriate for everyday safe pedestrian and cycle use. Parking chaos occurs for residents near the Woodstock Schools with cars parking on pavements up both sides of the narrow roads as well while they drop off and collect their children. * Would increase the number of already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. * The documents proposing the site states that it has, 'effective pedestrian and cycle links to the centre of Woodstock'. Those living in Woodstock know this to absolutely NOTbe the case. More cars will mean more cars parking on the pavement along Manor Road where they already cause a danger to pedestrians as well as those pushing prams or using a wheelchair. It will also add to the number of cyclists using the pavements as unofficial cycle paths causing danger to pedestrians.</td>
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MM166  Emma O'Regan  - O'Regan 361

I am writing in response to the proposal to build 120 houses on the land North of Hill Rise. We are devastated by this proposal.

The A44 is a dangerous road, with heavy vehicles and a lot of traffic. It can be difficult to turn onto the road and an additional 120 houses will not only add to the traffic, but increase congestion in Old Woodstock and on the A44 through the town.

There is a further risk to flooding at the bottom of the hill. The field and our garden become saturated but manage the heavy rainfall we are becoming so accustomed to. I fear that taking away this green space will increase the risk of flooding for those living further down.

We moved to Woodstock with a growing young family, wanting to have a healthy lifestyle. We make very good use of the local playpark, and the surrounding countryside for walking. In a time of increasing mental health and physical health issues linked to obesity, I cannot comprehend how a well-used field and playpark can be built upon?

In fact, the field is so well used by dog-walkers, that we recently adopted a puppy! My daughter and I now enjoy a walk before school around the field, and we all frequently use the field for dog walking, family walks and nature appreciation. I have not yet had a walk around the field without bumping into at least two other walkers enjoying the beauty of the field.

The field and park provide a community hub – where we meet other families, walkers, dog owners and people enjoying active lifestyles. The children in the community enjoy seeing the famers at work! We have felt so fortunate living here – with our children growing up seeing wildlife in the field and being so in touch with nature. To risk losing this is just so sad.

Our property was built 5 years ago, and planning for it was approved on the grounds that it maximised the use of the beautiful views across the field and would be an aesthetically pleasing place to live. We bought the house because of the views and surrounding open countryside. Every window from the property (excepting the bathroom) is full size and looks out to the field – and we absolutely love it. We were granted planning permission to extend the property, and planned the two extensions in order to further maximise the views. With the new proposal our house would need extensive works, and be drastically altered. I also question why we were granted planning permission – and as a result extended the house to further maximise the views – when if we had known of this proposal, we would have planned it very differently.

The increased noise, light and air pollution will significantly increase. Carbon emissions form people's homes and vehicles, the effect of light pollution on wildlife and the need for change of habitat for many creatures (including some grass snakes - which are protected creatures).

Please consider the detrimental effect on many people in this community, and the effect on healthy lifestyles.

* Use of the play area and football pitch for at least a year would be lost as well as access to footpaths to Wooton, whilst construction takes place. The quality of life would be damaged.

* In summary, the small historic town of Woodstock including Old Woodstock is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained it cannot take any more development.

* I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.
I am writing in regard to the housing developments in Woodstock. It is clear that none of these developments should go ahead without also providing for the consequences of extra people and motor traffic.

Expanding Old Woodstock will exacerbate problems along the A44. There have been accidents reported on this stretch of road in the last 12 months, including a pedestrian hit by a van that mounted the pavement. Above and beyond the reported incidents, locals have their own negative experiences: I have had to take action both as a cyclist and a car-driver to avoid accidents on this stretch of road, in both cases with lorries. The narrow sections are terrifying to walk along when lorries thunder past, their wing mirrors often stretching over the pavement. It is the only route for children to get to and from school and everyone one of us who sends their children along the path to secondary school each day already lives in fear of an accident. Please do not let the walk to school even more dangerous.

I am reluctant to accept any development in Old Woodstock but were it to happen, the increased pedestrian traffic would need protecting from the greater flow of motor traffic. These should include: a reduced speed limit along the A44 through the length of Woodstock; a safe option for cyclists (with more cycle racks in town) to reduce car traffic from Old Woodstock to the centre – and alleviate parking problems; an alternative route for passing traffic, especially lorries, to lessen the impact of increased local traffic.

Already, residents of Old Woodstock are not able to secure a place at the Woodstock primary school for their children. The existing primary school needs expanding or a second primary school needs building. If the former, the current traffic problems around the school need investigating. Parking along New Road, Shipton Road, Recreation Road, Green Lane and Kerwood Close, etc. is already impossible at key times. The car park at the library is, even now, sometimes too busy to use. (NB A bus service once ran from Old Woodstock to the primary school but was cut a few years ago for cost-saving.)

The impact of the complete set of Woodstock developments also raises concerns:

Local amenities are already under pressure. As previously mentioned, the primary school is over-subscribed. I believe the surgery also would need to expand were the local population to grow.

Putting more houses without amenities on the outer edges of the town will also bring more car-drivers into the centre and put even more pressure on the limited parking spaces. No developments should be considered without a solution to this problem being part of the equation.

The entrance to Shipton Road from the A44 is challenging and at busy times, traffic turning up Shipton Road backs up onto the A44 or, the other way, as traffic builds up Shipton Road, drivers become impatient and pedestrians are forced to the side. Increasing the volume of cars using this narrow route will cause accidents.

In addition to concerns for Woodstock:

The very large number of developments proposed for West Oxfordshire is going to create massive issues for the flow of traffic into Oxford. Increased and improved bus services as well as safe, well-lit and attractive-to-
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<tr>
<td>MM169</td>
<td></td>
<td>Emma Kate Gamble</td>
<td>-</td>
<td>365</td>
<td>I fully understand the pressure to provide more housing in this area but none of the Woodstock developments should go ahead unless they include solutions to the issues raised here.</td>
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<td>Local Plan - Land Northeast of Hill Rise Woodstock</td>
<td>I believe that the land Northeast of Hill Rise, Woodstock is totally unsuitable for development and therefore feel that it should not be included in the West Oxfordshire Local Plan due to the following reasons:</td>
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<td>Safety of residents whilst walking down the A44 into Woodstock. The A44 is already an extremely busy road at all times, however is especially bad during rush hours. As a mother of two young children I find walking to and from school a very worrying and at times dangerous. The pavements are particularly narrow and in places we have to walk single file in order to ensure our safety. Despite the 30mph speed limit, some cars do not adhere to this which can be very frightening. The lorries that already use the road at times have to mount the pavement on Manor Road in order to simply pass each other, putting pedestrians at serious risk. Any development will only cause to amplify these risks, by increasing the number of vehicles that will travel down the A44 into and through Woodstock.</td>
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<td>The loss of the playground and football pitch during the construction of the development. The playground and football pitch are in constant use by older children and families living in old Woodstock. Providing old Woodstock with a real sense of community. It is a place where children of all ages can mix and play and for a lot of them, the place they are able to meet friends from different schools. If this provision is lost during the construction of the development or as a result of it, the children will have to walk or travel to the playground in the centre of Woodstock. This means that their playtime will have to be organised in advance to ensure safety whereas at the moment children regularly pop to the playground for half an hour before tea or bed. Such safety and freedom will be lost.</td>
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<td>The green space which is intended for development is the only green space that residents are use cycle paths with priorities over motor traffic might help.</td>
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able to safely access without crossing the A44. As a family we regularly walk our dog on the footpath and can do so without having to worry about our safety with regards to cars. The footpath is regularly used by not only residents, but walkers and ramblers whom travel to Woodstock to walk in our wonderful countryside. Such people are known to also visit the town and local businesses at the same time. Even the most sympathetic development will take away the beauty of the local area and with it the rich variety of wildlife that inhabit it. Such wildlife as the bats, foxes, deer, pheasants, newts and grass snakes. Wildlife that the children are able to see first hand enhancing learning and increasing their appreciation of nature and how important it is to protect the environment we live in.

• Issue of schooling: We were fortunate enough to get places at the local primary school as a result of the last expansion (primarily for the children of Old Woodstock), however with new developments in the centre and behind the Marlborough school, Old Woodstock children are once again not getting into the school. Therefore further development in Old Woodstock can only mean that families will have to travel along to A44 to other local schools, exacerbating traffic.

• Pollution levels on the A44. The levels of pollution are already suspected to be over the levels permitted by the EU. Something local residents are in the process of finding out. Further development with increased traffic will only cause these to rise.

• Parking problems in Woodstock. Parking within Woodstock is already a huge problem and will only continue to get worse if Old Woodstock is considered for development. Many residents of Old Woodstock already drive into town as a result of the dangerous pedestrian/cycling conditions. Also for many residents the distance to and from town and the walk back up the long arduous hill is too much for them.

• Old Woodstock has no infrastructure (school, shop or doctors). Residents of Old Woodstock
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<tr>
<td>MM222</td>
<td></td>
<td>Holly O'Regan</td>
<td>-</td>
<td>O'Regan</td>
<td>426</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>have to regularly go into Woodstock for everyday amenities, as pointed out above to do this many residents have to drive. • Vermont Drive. The proposed access to the new development through Vermont drive is highly unsuitable. It is too narrow to support existing and new traffic that will have to travel along it. Old Woodstock has a strong community in which residents, especially children, feel safe. Increasing its size to nearly double, will have a major impact on the immediate residents and the local community of Woodstock as a whole. I therefore strongly urge you and your team to consider the above points and recognise how unsuitable the area is for any further development.</td>
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<td>MM232</td>
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<td>Jane Ma</td>
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<td>Ma</td>
<td>438</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>Please save our field! We like playing at the play park. Me, my Mum and dog go around the field and have a amazing walk there together. It’s a really good view from our house. Me and my friends meet each other at the park because we all live by the field.</td>
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<td>MM240</td>
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<td>John O’Regan</td>
<td>-</td>
<td>O’Regan</td>
<td>446</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I wish to raise concerns about the potential development of land northeast of Hill Rise. Whilst I am not against development, and understand the need for new housing, I do believe the proposal is an overdevelopment of the local area of Old Woodstock. I am mainly concerned for the following reasons: 1) Children in Old Woodstock have historically already had problems getting into the local primary school because it is oversubscribed. If the school will not expand, and there is no mention of this, this problem will only be exacerbated for families in Old Woodstock. 2) There are already problems accessing health services in Woodstock. 3) I believe if the development went ahead at Hill Rise the problems of parking in town would only get worse. Old Woodstock is furthest from the town, and requires walking up and down a hill. The pedestrian access is not good, and I have received a letter from our MP confirming he agrees with this. I have also been in touch with the OCC about the safety of the pathway to town.</td>
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<td>Draft Local Plan 2031: Strongest possible objection to building on land north of Hill Rise in Woodstock I am writing to explain why I object so strongly to the proposals to build 120 new homes on land north (north-east) of Hill Rise. Some of the reasons are personal, which I understand will carry little weight, but I want you to know how much this proposal could impact on my life and the life of my family. The other reasons are less personal and relate to the impact on the wider area and the community. Here follows a list of reasons: • Our house, Field House, was built in 2011 and has been designed to enjoy the views over the field which is now under threat of development. We have massive windows and doors throughout the house, downstairs and upstairs, which are all designed to enjoy the views. You can imagine (I have added pictures below) that any development on this field will literally destroy the purpose of the house. We will suddenly have a house which...</td>
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<td>has aspects from every room into a housing estate and all our of our rooms, particularly our bedrooms, will become visible from all the new houses. Considering the house was recently built (2011), with planning permission from your office (10/0627/P/FP - 'Views to the north over fields are yet to be fully realised') and recently extended (14/0777/F/FP) to enjoy the aspect of the field this development would cause considerable stress and unhappiness to us as a family as well as having a material cost in terms of the value of the property or in having to spend money to change the nature of our house so it is less exposed. For example we several thousand pounds to rebuild a dry stone wall which will need to be turned into a fence in all probability.</td>
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<td>• As well as enjoying the aspect of the field and countryside, we know how heavily used the area is for walking and recreation for members of the public. Many people walk their dogs daily and 100s more use the area for walking and general recreation. This development would mean people either have to go further from their homes, which is unlikely to happen for children, or not be able to enjoy leisure facilities. Given the general consensus that health is deteriorating among our society I do not think we can afford to remove such a well used recreational space.</td>
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<td>• This links to the removal of the park and football pitch, at least while it is being built and possibly even longer. We use the park often (my children are 4 and 6) and it was one of the reasons we chose to buy our house. My son is just starting to play football regularly and we see 100s of children from the area using the park on a regular basis, One of the main advantages of this park is how safe it is to get to (we don’t need to use the road), how enclosed it is and how many people use it locally, making it feel very safe. The next nearest park would involve us walking to Woodstock town centre, which given the distance and nature of the journey along the busy A44 would not happen.</td>
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<td>• The noise and disruption during building would be particularly harmful for us. As we mentioned already, we have windows overlooking the field from every room and all the noise, pollution and traffic during construction would be particularly troublesome for my family.</td>
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<td>• A final personal issue is that the traffic caused by the new development would make the area more dangerous for children in the area, including my own. Currently we can safely ride bikes and scooters as traffic is relatively light. So long term car use would be massively increased making the area less safe. Other more general issues include:</td>
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<td>• Old Woodstock as an area has no infrastructure such as shops, schools or doctors. We all use Woodstock for these services, so increasing the population here would increase the number of journeys to Woodstock along the dangerous A44 and would increase parking in Woodstock which we know cannot cope with the current parking issues. Building closer to Woodstock or not all all would not cause the same problems.</td>
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<td>• The traffic through Woodstock would also significantly increase as there would be 100s of journeys towards Oxford and London. If the development was built on the south of Woodstock, or not at all, the journeys through historic Woodstock would not be increased.</td>
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<td>• I am told that Woodstock Primary School has refused children places at the school from Old Woodstock as there are not enough places. This development would exacerbate that problem, and raises the issues of where the children in this new development would be educated?</td>
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<td>• Pollution levels would increase significantly for the area. There would potentially be 240 cars (2 per house) driving through the area as well the emissions caused by housing.</td>
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|    |              |      |       |        |            |           | • Traffic generally in the area is a real issue. The A44 is a very dangerous road to walk on with children (hence}
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| MM249         |                         | Julia Johnson  | Johnson           | 457        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | why so many people drive to Woodstock). More cars would add to the problems. Construction traffic would make it even worse. I would not be surprised if a young person was seriously hurt or killed using the A44 as it is, let alone with increased traffic.  
• The final issue is that the area is a fantastic place to live as there is a real community of people who live around the 'field'. We walk and play on these fields, the children meet their friends and adults regularly use it for social gatherings. This proposed development would destroy that community. Given all the above points, and the thoughts of Woodstock Town Council who are opposed to this type of development, I hope you will reconsider and revise the local plan so that the development north of Hill Rise is removed for consideration from the local plan. |
| MM250         |                         | Julie Kennedy  | Kennedy           | 458        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock | I wish to make observations on the recent proposals to develop farmland on the northern edge of Woodstock.  
I am concerned at the scale of the development primarily because of  
Added strain on the capacity of the A44 - already a heavily used through route.  
I doubt residents on this new estate will walk to the town to support the shops and amenities (will the Doctors Surgery cope with the additional patient list?). The pavements are narrow and on a rainy day if you use an umbrella you run the risk of being drawn in by the draught from the lorries passing within inches.  
Woodstock is already known for the challenge of finding a parking space, another 120 houses with associated vehicles won't ease this situation – unless you are planning a dormitory community.  
Routing of traffic through Barn Piece  
I believe the proposal is to route traffic to/from the new estate through Barn Piece Estate, via Vermont Drive and Rosamund Drive. This will add congestion to already busy road junctions for residents of Barn Piece. This area is also used as a turning point for the S3 bus service.  
Surely, if this development goes ahead, the large field gate onto the A44, already in place north of Hill Rise, would be a better access point.  
Loss of a communal play/recreational area  
I am concerned about the loss of the playground, the only open play area for children (and others) in Old Woodstock. We need to encourage the next generation to meet and play together face-to-face instead of falling into the virtual world of friendships via computers.  
I am doubtful whether letters from Woodstock residents will have any impact on the outcome of the Local Plan, but I hope the Council will take the time to consider our views.  
Re: Local plan and development of “Land North of Hill Rise”  
Before I comment on the above I would like to mention something that is relevant to wherever any potential development takes place in Woodstock, ie parking. As everyone is aware Woodstock is linked to Blenheim and many visitors to the palace take this opportunity to explore the town. Local people already have real problems in trying to park in town, being it for shopping, a visit to the doctors or pharmacy for example. I |
have popped into town around 8.30 on a weekday to find very little parking available. With an aging population, people who live in Woodstock tend to stay, this lack of parking is a real worry and any development will exacerbate this. Additionally the new bus service linking Woodstock to Oxford Parkway railway station is likely to encourage people from the surrounding villages to use this excellent service, but where will they park?

However, this letter is specifically about Old Woodstock and my objections are as follows:

- Evidently the proposal is to access the new build via Rosamund Drive/ Vanburgh Close. This would destroy the wonderful play area the children of Old Woodstock and Hill Rise have. The play area also has a half-sized football pitch and is used by those outside Old Woodstock. It is also a very safe place for the children to go and play; prior to the building of this play area the children had to play in the streets and this is obviously unsafe.
- The estate is the terminus for many buses to Old Woodstock and this can cause problems at present with buses blocking the road whilst turning. Vermont Drive is too narrow for extra traffic particularly building lorries etc.
- The number of houses proposed is more than the whole of the Barn Piece estate .
- All residents of Old Woodstock use the doctors’ surgery in the town; even now they struggle to cope so this would only get worse.
- The main A44 is already extremely busy and the pavements are very narrow, especially for prams etc. or anyone in a wheelchair. The statement that there is effective pedestrian and cycle links to Woodstock is not true.
- Children walk to the Marlborough School on these narrow pavements . With the pollution levels at a high level this cannot be good for them and additional traffic will make this worse.
- The Primary school is full and children from Hill Rise cannot get in. Any new development could mean children being forced to travel to other local schools.
- Old Woodstock is a community, for example we have Mock Mayor Day something Woodstock doesn’t have. People have walked for years on the edge of the field and onto the green lane. I have lived here for 35 years and this has always been the case.
- This would also spoil the walk to Wootton; the loss of these wonderful open spaces would be an enormous loss to the community.

To conclude, Old Woodstock cannot cope with this proposed development for the above reasons.

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan. You will have received a number of letters outlining strong reasons why this land should not be developed and I agree with them all wholeheartedly. I would also like to add:

- The proposed entrance to the new housing would cause stationary traffic at the A44 / Vermont Road interchange which would cause pollution as vehicle stand waiting to turn. This junction is directly outside my house and will have a direct impact on the quality of the lives of residents who live in the area. Pollution levels on the A44 are already suspected to be over the levels permitted by the EU .
- The proposal will build over open fields which are used frequently by residents. The field on which the proposed building is planned is the only open space which residents can use to exercise their dogs off-lead. It is a community asset and regular interactions between different members of the community occur here. Holyhocks and other flowers have been planted to enhance the environment for those that use it.
- The field is a haven for wildlife. Skylarks can be found in the fields as can roe deer and other wildlife (foxes

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<tr>
<td>MM254</td>
<td>Kate Alderton Smith</td>
<td>464</td>
<td>Sub Area &gt; MAIN 166</td>
<td>have popped into town around 8.30 on a weekday to find very little parking available. With an aging population, people who live in Woodstock tend to stay, this lack of parking is a real worry and any development will exacerbate this. Additionally the new bus service linking Woodstock to Oxford Parkway railway station is likely to encourage people from the surrounding villages to use this excellent service, but where will they park? However, this letter is specifically about Old Woodstock and my objections are as follows: * Evidently the proposal is to access the new build via Rosamund Drive/ Vanburgh Close. This would destroy the wonderful play area the children of Old Woodstock and Hill Rise have. The play area also has a half-sized football pitch and is used by those outside Old Woodstock. It is also a very safe place for the children to go and play; prior to the building of this play area the children had to play in the streets and this is obviously unsafe. * The estate is the terminus for many buses to Old Woodstock and this can cause problems at present with buses blocking the road whilst turning. Vermont Drive is too narrow for extra traffic particularly building lorries etc. * The number of houses proposed is more than the whole of the Barn Piece estate . * All residents of Old Woodstock use the doctors’ surgery in the town; even now they struggle to cope so this would only get worse. * The main A44 is already extremely busy and the pavements are very narrow, especially for prams etc. or anyone in a wheelchair. The statement that there is effective pedestrian and cycle links to Woodstock is not true. * Children walk to the Marlborough School on these narrow pavements . With the pollution levels at a high level this cannot be good for them and additional traffic will make this worse. * The Primary school is full and children from Hill Rise cannot get in. Any new development could mean children being forced to travel to other local schools. * Old Woodstock is a community, for example we have Mock Mayor Day something Woodstock doesn’t have. People have walked for years on the edge of the field and onto the green lane. I have lived here for 35 years and this has always been the case. * This would also spoil the walk to Wootton; the loss of these wonderful open spaces would be an enormous loss to the community. To conclude, Old Woodstock cannot cope with this proposed development for the above reasons.</td>
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I am writing to object to the proposed housing development of 120 new homes on the land NorthEast of Hill Rise in Woodstock - my apologies but I could not find a specific reference number for this development in the 30 minutes I spent searching your website and the library documents - why was this information, if required for any objection, not included on the Local Plan Exhibition panels?! It seems to me designed to make it difficult to object to any proposal!

I appreciate the need for more housing in Oxfordshire, particularly affordable housing, however this needs to be done in a way which does not severely impact on the quality of life of all of the inhabitants and adversely impact on their health, safety and economic productivity. My objections are as follows:

1) The proposed access to and from the new development is as far as I can see is solely via Vermont drive, which will increase the already large volumes of traffic and associated air pollution on the A44 through Woodstock, and the commuting journey times for all residents, which have already doubled in the past 8 years for those going into Oxford

2) Old Woodstock has no infrastructure (shops, schools, medical facilities) which means all residents and their children will have to either drive (and park!) in Woodstock for everyday necessities, walk or cycle. Residents will not be able to find parks in town due to the inadequate provision for additional parking, so they will have to walk on the narrow sidewalks, which are often already obstructed by illegally parked vehicles and will not allow strollers to pass each other without going onto the road! cycling on the A44 through woodstock is already hazardous in the extreme due to the heavy traffic and poor visibility in places.

3) Access to the school for the increased number of old Woodstock residents will be via Hensington Road, which is already a safety hazard for pedestrians and a traffic chokepoint due to it being very narrow and shared between two way traffic and pedestrians. Woottion School is too small to help accommodate the additional number of children in the area.

4) The plans seem to assume that the developments in Woodstock will not increase parking need in central Woodstock due to the majority of the parking being used by tourists. I cannot see that this assumption is based on any evidence, it has not been my day-to-day experience as a local resident trying to find parking for various reasons. I believe the consequences will be that the parking provision for the additional developments in all of Woodstock will be woefully inadequate, and much more difficult and expensive to correct once the developments have been completed.
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<tr>
<td>MM266</td>
<td></td>
<td>Mandy Miller</td>
<td>-</td>
<td>Miller</td>
<td>479</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I strongly advocate for a dedicated shared cycleway/pedestrian walkway running parallel to the A44, with elevation/bridge over the river Glyme, to be a compulsory condition of the old Woodstock development. This would relieve the traffic and associated pollution on the A44, allow the increased number of children in Old Woodstock to more safely travel independently to Woodstock School, and provide a much-needed northern connection to the cycleway along the A44 to Oxford for commuters. Thank you for your consideration.</td>
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</table>

I live in Old Woodstock and have two children of primary school age. I am opposed to the amount of land being made available for housing in Woodstock.

Heavy traffic on the A44, lack of parking in the town and lack of infrastructure are highly significant problems for the town.

The town is currently at full capacity with regard to these issues. Of particular concern in my more local vicinity is the Land North of Hill Rise.

I believe it is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

1. No Infrastructure - more traffic on A44 Old Woodstock has no infrastructure (shops, school, doctors etc.) which means all residents have to travel on the busy A44 for everyday things at the least. This is not so for the other proposed sites in Woodstock. Residents would be likely to travel to work and school at the other side of Woodstock requiring them to travel the entire length of the A44 through the town. Likely destinations such as Woodstock, Oxford, Water Eaton Station to London, Marlborough Secondary School, Woodstock Primary School and also schools in North Oxford, Kidlington, Long Hanborough, Witney and Eynsham, all require residents to travel the entire length of the A44. An increase in traffic would make the road more hazardous, polluted, increase traffic jams and further exacerbate difficulties at specific points - e.g. at the Hensington Road junction and in Shipton Road during school drop-off/pick-up (note collision of buses recently outside Marlborough School).

2. Pedestrian Safety - A44 – NOT – 'a comfortable' or 'effective' pedestrian and cycle link/route. Any houses built on the Land North of Hill Rise, would increase the number of pedestrians walking along the main A44 to get to town and both the primary and secondary schools. There is no walking route that avoids this road but walking on the pavements of the A44 into Woodstock is hazardous. Lorries and buses travel over the speed limit a foot from pedestrians, and often struggle to pass each other. Of significant note is the teenager who was knocked down last year by a van mounting the pavement - she had serious head injuries. On Thursday 3rd November a Golf appeared to have been hit head on opposite Hill Rise, with police in attendance. Traffic police recognise a problem as in during autumn of 2016 they were often positioned opposite Hill Rise doing speeding checks. The route is used by mothers with young children and buggies walking to the primary school and/or playgroups in the town, and teenagers walking to Marlborough School. There is a bus which - whilst helpful for those with bus passes, single journeys and more time - is expensive and impractical for those making numerous journeys per day and at specific times.

3. The Character of Woodstock Town suffering due to lack of parking More residents in Old Woodstock would increase parking in the town. The character of the town is suffering greatly due, in part, to lack of parking for shoppers and visitors. Due to the distance and hazardous walking conditions, residents from North of Hill Rise would be more likely to drive into Woodstock than from the other proposed sites, so further exacerbating the already problematic parking issues in the town.
4. Infrastructure – Woodstock Primary School

Woodstock Primary School has increased its intake from 30 per year to 45. This has happened over the last 6 years since my daughter started because it did not have enough space to accept all of Woodstock children. That year (2010), it is my understanding that 10 children (many from Old Woodstock) did not get into the school and so went to Wootton, Yarnton, Long Hanborough and Kidlington primary schools. I have witnessed the expansion of the school yet I see the situation has arisen again, with children in Old Woodstock not sure they will be able to get into their local school - indeed our neighbours are moving away from Hill Rise and closer to the school for this reason. This, I assume, is partly due to the building that has, and is happening closer to the school at Banbury Road and behind the Marlborough School. Woodstock school Primary School is now at capacity and has approx. 300 pupils. A further 670 new houses may equate to 250-300 more children (of all ages, and depending on the type of dwellings built etc.). The natural expansion of the school would be to a two year intake of 60 (just another 105 places), but this would soon not be sufficient for even a fraction of the proposed houses. With regard to Old Woodstock, as it is farthest from the school many children from Hill Rise, Barn Piece estate AND any new houses built on the Land North of Hill Rise would be unlikely to get school places within their own community - as the situation stands, and if the school expanded to a two year intake alongside further building closer to the school. An impractical and unfortunate situation for the children, families and community, but also further adding to the traffic on the A44 as parents would need to drive to villages further afield.

5. Character of the Area and Community

Houses built on the Land North of Hill Rise would have a detrimental effect on the wonderful community that has built up over many years between Hill Rise and Barn Piece Estate. There is a strong community life that has been brought about in part by the open space and natural links of the Land North of Hill Rise. It is a special and sought after place to live for that reason. The playpark, woods, footpath, field view and grassy walk create a safe and sociable outdoor space for children, teenagers, elderly, families, runners, walkers, tourists and dog owners. From verbal reports, photographic evidence and historical maps it has been this way for at least 30 years and continues to grow stronger with a summer fete, annual BBQ and rounders match, Halloween party and other events. The space and community life play and important role in the support, security, health and wellbeing of its residents, and the space is in use from 5.30am by dog walkers, runners and walkers, and continually by others until the evening, and into the late hours of the summer months.

The character of the community has evolved the way it has due to the open space and it would deteriorate if the space were to be taken away.

Dear Mr Hargraves

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

* Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.

* Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock.

* Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the
case for other sites.

* Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, ‘effective pedestrian and cycle links to the centre of Woodstock’. Those living here know this to absolutely NOT be the case. Old Woodstock just can’t take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

* Old Woodstock already has a problem with schooling– Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake ~ only 105 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.

* Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

* We could lose the use of the play area and football pitch for at the least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.

* Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

* Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

* Vermont Drive is far too narrow to support new and existing traffic.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

Yours sincerely

Lucy Floyd (Mrs)
8 Vanbrugh Close, Woodstock OX20 1YB

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MM277  Martin Galpin  -  Galpin  491  Document Full Path > SECTION 9 - STRATEGY

It was good to meet some of your colleagues at the public exhibition in Woodstock last week. It was very helpful to be able to discuss some of the proposed changes to the local plan in person.
As requested I am writing to share some of my concerns about the planned amendments for Woodstock, and in particular the Hill Rise site. There are a number of reasons why I believe this site inappropriate for development, the most significant of which are:

* Road and pedestrian safety

  * The volume of traffic on the A44, and the fact that it is used many large lorries, means that it is not appropriate for children (or less confident or experienced adults) to cycle to the town or school. This contributes to more journeys being made by car.
  * The footpath into the town is very narrow in places and very close to the road. As you may know, earlier this year a young woman suffered serious head injuries when a van mounted the pavement and knocked her down. As a parent I am already anxious about my children walking into Woodstock when they start secondary school next year, because there is no alternative route for them to walk.
  * The A44 near Hill Rise is a very busy road and is a major concern to me. Over the last 10 years we have seen several serious accidents very close to Hill Rise, with the air ambulance landing in the field (the proposed site for development) on more than one occasion and the road being closed by police numerous times. Within the last year a pedestrian was killed on the A44 not far north of Hill Rise.

* Parking

  * If new housing is to be built in Woodstock it would be helpful if it could be within easy walking distance to the town centre, along a safe route.
  * The distance of Hill Rise from the town, and the fact that that safety is a concern on the walk, means that most people this end of town will often drive in. We already have a shortage of parking in Woodstock meaning I often have to drive around the town several times in search of a space. Adding further housing without significant addition of parking would bring further disruption to the town and may further impact safety on the A44 – in recent months we have seen more cars parking on the A44 itself on the hill into Woodstock and near the Black Prince pub.

* School capacity

  Although we live exactly 1 mile from Woodstock Primary School, our children did not get a place at the school because it was full with children living closer. Even since the school increased capacity a few years ago, other children in Hill Rise have failed to get in.

Adding more houses in this part of the town would add further to this issue and result in more children being driven to schools further away.

Other concerns I have about the Hill Rise site include the potential loss (even temporarily) of the popular play area, loss of green space, increase in traffic and the lack of any kind of infrastructure in Old Woodstock.

Although I am less familiar with it, I also believe that the land north of Banbury Road is not suitable for development on the scale proposed. Traffic access through the town is difficult due to the narrow part of Hensington Road and the alternative routes out of the town are small country lanes that are not equipped for much more traffic.

I have fewer concerns specifically about the proposed site to the east of Woodstock, but do strongly believe that the town of Woodstock is already at capacity and will be impacted by additional development in the
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MM288 |  | Mr and Mrs Brooks | - | Brooks | 503 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | surrounding areas, e.g. Stonesfield, Bladon and Tackley. Adding any significant number of new homes to the town will need some major improvements to infrastructure such as doctors’ surgery, parking and schools.

Thank you for taking my views into consideration and for the communication about the proposed changes to the plan.

We believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

* Old Woodstock has no infrastructure (shops, school, doctors etc.) which means all residents have to travel into town on the busy A44 for everyday things, which is not the case for other sites in Woodstock.

* This proposal will cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and schools in North Oxford, Kidlington, Eynsham. This would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, ‘effective pedestrian and cycle links to the centre of Woodstock’. Those living here know this to be NOT the case. Old Woodstock just can’t take any more residential traffic, as well as at least a year of construction vehicles. Noted incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. Being a resident in this part of Hill Rise we have noticed over the 30 years we have been here the major increase in vehicles passing through the town and have been witness to many of the accidents that have occurred over the years. We also have to witness HGV’s and buses trying to turn round using this slip road, which is not big enough to take such vehicles and often they have to reverse back onto the main road which is a danger in itself. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

* Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality residents know all too well and not the case for other sites.

* Old Woodstock already has a problem with schooling. - Currently at capacity with Hill Rise children not getting in. Could go to 2-year intake = only 105 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.

* Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

* We could lose the use of the play area and football pitch for at least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.

* Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too
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| MM292         |                         | Natalia Beddoe  | -                | Beddoe            | 507        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | * Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.  
* Vermont drive is too narrow to support new and existing traffic.  

In summary, the small historic town of Woodstock and Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. We urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.  

We hope that the above can be taken as a serious objection to any proposed planning on this site. |
| MM295         |                         | Nicki Hale      | Mrs              | Hale              | 510        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | As a resident of Hill Rise for over 22 years, I am writing to urge West Oxford District Council to reconsider the proposed development on the land Northeast of Hill Rise, for a number of reasons.  
  
* Safety concerns regarding the A44, with a number of major accidents each year, due to the high volume of cars and lorries using this road.  
* Vermont Drive is not designed for the huge volume of construction traffic that would be required for this type of development, and on completion the number of extra cars. |
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<tr>
<td>MM300</td>
<td></td>
<td>Paul Sloan</td>
<td>Mr Sloan</td>
<td>S15</td>
<td>&gt; SECTION 9</td>
<td>I have reviewed the planning application and strongly believe that the land Northeast of Hill Rise is totally unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan. As a resident and a former resident of Long Hanborough it is obvious the local area does not have the infrastructure to support the expansion planned. For Old Woodstock the traffic is already a major concern during peak times and weekends. An additional 120 homes would exacerbate this situation which would bring considerable safety and noise issues to the current residents who have already have to deal with dangerous pathways into the town centre. With children in the local school we already see the pressure on the current education system and adding</td>
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* Old Woodstock has no infrastructure and parking in the town is often problematic, with our main car park often being used by local villages to commute by bus into Oxford.

* Events in Blenheim have increased hugely over the years, creating more traffic problems on top of the high level of tourism that it brings.

* Woodstock residents are already facing huge problems placing their children in local schools, with Bladon recently having to increase its intake due to the high demand.

* 120 houses, with possibly more than 240 additional residents would put a significant strain on our doctors surgery, which is already struggling with the current demands.

* The playing area would be a huge loss for the children surrounding Hill Rise, and in fact the only facility that is currently on offer for residents without making the often unsafe journey on foot into the town.

* Other sites in Woodstock are better suited for this type of development, with proposed extra facilities.

* Countryside and wildlife, already diminishing at an outstanding rate throughout this country needs to be valued and preserved.

A few years ago planning was requested for a private house opposite us in Hill Rise, despite objections from other residents it still went ahead. In doing so it changed a detached house with one/two cars into two dwellings on occasions responsible for 6 cars, a lot parking halfway across the pavements on a daily basis. The dustbin lorry on one visit had to abort its journey due to the number of cars parked in the street, and we are just grateful that up to now emergency services haven’t been required in the evenings as access is often problematic. This is an example of how houses keep springing up in areas that were not originally designed for the extra number of cars per household and numerous waste collection bins that have become our normality.

Whilst I understand the demand from the government to increase the number of houses built in this country over the following years is a huge driving force, and that of course no one ever wants these developments in their back yard, I am not convinced that other options have not been explored fully. It also feels that the general public no longer have a voice in having our landscapes changing constantly around us and not always for the best.

I appreciate you taking your time to read this and would be very grateful if you could consider these important factors before deciding on this huge project, and the implications that would effect so many of our lives for years to come.
Further pressure would no doubt not only affect our children’s education, but put unnecessary strain on the schools due to the extra demand any expansion would bring.

Finally I moved to this location for the countryside and living standards for my family to enjoy after spending my former years in major cities. I understand the need for extra housing in the area, but without the relevant infrastructure, schools, roads, public transport, lack of cycle lanes, parking, doctors, dentist… I could go on, the thought of adding to the strain onto a system that is already stretched beyond its capabilities is short sighted, dangerous, and a risk to the community of Woodstock.

I believe that the land Northeast of Hill Rise is wholly unsuitable for development and therefore should not be included in the West Oxfordshire Local Plan, due to the following reasons:

- Old Woodstock has no infrastructure (shops, school, doctors etc) which means all residents have to travel into town on the busy A44 for everyday things. This is not the case for other sites in Woodstock.

- Would cause significantly more traffic travelling the whole length of A44 through Woodstock, as there are 120 houses planned, increasing Old Woodstock by 50%. Residents are likely to travel to work and school: Oxford, Water Eaton to London, Secondary School, Primary School and also schools in North Oxford, Kidlington, Eynsham. This is not the case for other sites in Woodstock.

- Existing parking problems in Woodstock would be made much worse as many residents will drive into Woodstock, due to distance and road conditions (please see point 4 below) being highly inappropriate for everyday safe pedestrian and cycle use. This is the harsh reality local residents know all too well and not the case for other sites.

- Would worsen already serious safety concerns of the A44 which has extremely narrow pavements and very fast traffic. The documents proposing the site states that it has, ‘effective pedestrian and cycle links to the centre of Woodstock’. Those living here know this to absolutely NOT be the case. Old Woodstock just can’t take any more residential traffic, as well as at least a year of construction vehicles. Note incidents: van mounting pavement last year seriously injuring a teenager (head injuries), on Thursday 3rd November a Golf appeared to have been hit from the front opposite Hill Rise, with police in attendance. Also, police are regularly monitoring traffic speed exiting Woodstock, opposite Hill Rise. There any many reported incidents of HGVs regularly mounting the pavement on Manor Road. We are horrified by current conditions where we fear for our elderly, parents pushing buggies, teenagers and children.

- Old Woodstock already has a problem with schooling– Currently at capacity with Hill Rise children not getting in. Could go to 2 year intake = only 105 more places. 670 more homes = 200-300 primary children. Also, Hill Rise and any new development would be the last to get a place, so may have to travel (on A44) to Kidlington, Long Hanborough and Yarnton, thereby further exacerbating traffic concerns.

- Pollution levels on the A44 are already suspected to be over the levels permitted by the EU. Residents are in the process of trying to obtain more accurate levels.

- We could lose the use of the play area and football pitch for at least a year, whilst construction takes place. Children are already at risk having to travel to Woodstock for schooling and other amenities and would then have to travel for play. In addition, it is unlikely that any proposed new play area would be as safe and easy to access for our children as the current site, not to mention whether it would include a half-sized football pitch which is currently in constant use by many members of Old Woodstock and greater Woodstock community.

- Removing a valuable piece of countryside from Woodstock would be intrusive and damaging for our
community. An important, idyllic portion of the scenic walk to Wootton would effectively be destroyed. No carefully considered development would be able to avoid this repercussion. Views would be altered to far too great a degree.

* Very strong Old Woodstock community would be destroyed. This has been built up over many years due to the vicinity of the open space, green walkway, play area, footpath. This would be destroyed if open space was taken away. Also for walkers, dog walkers, safe for children. Has been this way for 20-30 years.

* Vermont drive is too narrow to support new and existing traffic.

In summary, the small historic town of Woodstock and in particular Old Woodstock, is already suffering with the recent housing development undertaken. Its infrastructure is extremely strained and on so many levels it cannot take any more development. I urge you to consider the issues listed above, which illustrate how the site to the Northeast of Hill Rise is extremely unsuitable for development.

1. The existing Barn Piece estate has 112 houses, and the proposed new development would more than double that development, making Old Woodstock a much more crowded area, taken together with Hill Rise and Manor Road (a further 170 existing houses).

2. Old Woodstock has no infrastructure (no shops, no schools or doctors etc) and the proposed site is approximately one mile from the town of Woodstock, accessed only by the busy A44.

3. Footpaths bordering the A44 between Old Woodstock and Woodstock town are narrow, and pedestrians, including mothers with pushchairs, often seem at risk from heavy vehicles and fast moving traffic. Pedestrian and vehicular traffic from the proposed new development would increase safety concerns considerably.

4. The primary school is already over-subscribed, and children from the new development would be unlikely to find places there, resulting in car journeys to other towns and villages. The Marlborough School is almost 2 miles from the proposed site, approached only by the A44 and the town centre.

4. These aspects alone – lack of infrastructure, limited safe access to the town and overcrowding of the area - make this site unsuitable for a development of this size.

6. The proposed access to the new development is via Vermont Drive is also the only access to the existing Barn Piece estate, and a bus route and terminus. It is a residential road, about 100 yards long and 17 feet wide.

There are 10 buses a day (8 on Sunday) which reverse at the junction with Rosamund Drive, and wait in Vermont Drive for an average of 6-7 minutes each. At the time of bus visits, one way traffic only is possible in Vermont Drive, and HGVs passing the bus have to use the pavement. Vans, lorries, coaches and cars often use the Rosamund Drive and Vermont Drive junction to reverse and turn back towards the town. At busy times, when residents are leaving for work or returning home, Vermont Drive and this junction already cannot cope with existing levels of traffic.

7. Vermont Drive is too narrow to support both existing traffic and the extra traffic the proposed development would bring.

7. The suggestion that another access to the proposed site could be made from the A44 north of Hill Rise seems impractical. The A44 is too narrow to allow for right turning traffic in a 50mph limit, and major alterations to Hill Rise would be necessary to arrange an opening from the very narrow service road there.
8. The children's play area at the end of Rosamund Drive, now intended for closure to give access to the new development, has a special significance for Old Woodstock residents, and will be a tragic loss. In 2013 it was saved from closure when Blenheim Estates purchased the field, following strong local protest and newspaper coverage. It seems unlikely that the play area, together with its associated half-sized football pitch for children, can be re-located within the new development so as to be as accessible and popular as it is now.

8. Above all, the new development would remove a piece of countryside, with a town to town public footpath running through it, which has become important to all local people, particularly those with houses bordering the field. The footpaths along three sides of the field have been used by local families for decades, as shown by a recent Town Council survey identifying well used local paths. The loss of countryside to Old Woodstock would be significant and intrusive.

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<tr>
<td>MM310</td>
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<td>Philip Williams</td>
<td>Mr</td>
<td>Williams</td>
<td>550</td>
<td>&gt; SECTION 9</td>
<td>I believe that the land to the North East of Hill Rise is wholly unsuitable for development and I therefore object to the proposal being included in the West Oxfordshire Local Plan for the following specific reasons: I am concerned that any development of land North of Hill Rise in Old Woodstock will result in an overloading of both the provision of “run-off” water systems and the existing single sewer arrangement for foul waste. As a resident of Old Woodstock, I have seen with my own eyes the run-off water from the existing road system of the Barn Piece estate forming a “lake” around the green space in Westland Way. At the time, the only option to prevent the houses on the South side flooding was for residents to lift the lid on the foul drain to reduce the water level. This flood risk will be considerably increased by ‘building over’ the field with materials which inhibit water absorption. The sewer has also failed by blockage several times over the last two years; on one occasion discharging raw sewage into Blenheim Lake via the Seven Arches bridge for several days at the end of May 2016 (2 weeks before the Blenheim Triathlon swim/run/bike event) and on another flooding my own premises with sewage as the foul waste of the whole of the existing Barn Piece estate rose in my downstairs bathroom (Photographic evidence available on request). I have further concerns in respect of the safety of children, particularly of primary school age, whose current pedestrian route is along the A44. When my own children were of this age, a bus service was provided due of the well-understood hazards of this road. A44 traffic levels have not reduced in the intervening seven years, but the bus service has been withdrawn by the Council and in the current financial climate this is unlikely to be restored. The A44 pinch-point 20m North of the converted St. Andrews Church is regularly littered with the broken mirrors and wheel trims resulting from minor HGV collisions and pavement clipping/mounting; the pavement is only 70cm wide at this point on the West side. Additional traffic generated by the proposed development will worsen an already poor situation. To conclude, I believe the infrastructure of Old Woodstock is not capable of dealing with an additional development of this size.</td>
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<td>MM323</td>
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<td>Robin Chan</td>
<td>-</td>
<td>Chan</td>
<td>592</td>
<td>&gt; SECTION 9</td>
<td>I live in front of the proposed development site and am writing to ask that WODC refuse this planning application from the Blenheim estate. Herein my comments and objections relating to this planning application: The development will overlook our property; this will lead to a loss of privacy and will</td>
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<tr>
<td>MM338</td>
<td></td>
<td>Simon Harrison</td>
<td>-</td>
<td>639</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I am writing to express my concerns and views around the proposition of 120 homes being built on the land North of Hill Rise outlined in the Local Plan. As a resident of Old Woodstock I have become increasingly concerned about road safety in the area and the lack of suitable footpaths and pavements for pedestrians to travel to town by foot. This has worsened considerably in the last few years due to weight of traffic utilizing the A44 and the size of the vehicles that frequent this particular part of road. Any further development of Old Woodstock would increase the risks associated with foot traffic and the risk of a fatal accident would be hugely increased. The increase in traffic and development traffic would also increase the number of vehicles using this stretch of road. On a wider related issue, due to my concerns above, I believe we would see a far greater number of cars travelling from old Woodstock to use Woodstock town thus creating more issues with parking and infrastructure.</td>
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Certainly impact on the peaceful enjoyment of our home and garden, causing noise and light pollution.
Terrace Road is already a busy and congested road; this additional concentration of traffic and roadside parking will cause traffic problems and create a safety hazard for other motorists.
The local area will be without a football pitch and play area for the local children. The nearest one after this is over 15mins away.
Would worsen the already serious safety concerns of the A44 which has extremely narrow pavements and fast traffic. Traffic in woodstock is already bad and adding more housing in this area will present a danger to pedestrians and help to worsen the existing traffic on the A44.
Woodstock simple does not have the facilities to cope with the increase in population of this size. Schools are already difficult to get into, the doctor's surgery and it would cause unnecessary strains on the shops, services and parking in the town center.
It would remove a valuable piece of the countryside. As a dog owner who has lived over 20 years in Hill Rise, I have enjoyed the idyllic countryside view from my house and the scenic walk. All of this would be destroyed by the development.
Therefore, we ask that WODC to refuse this Planning Application.
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<tr>
<td>MM343</td>
<td></td>
<td>Stan Scott</td>
<td>Mr Scott</td>
<td>644</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>Many of my friends and local Woodstock people don't now use the town due to the influx of tour buses and tourists which make the Woodstock experience horrific for parking and general traffic. The land proposed for development is an integral part of the Old Woodstock community and families, friends and dog walkers regularly gather together to spend time in the playground and wider fields. This is what Living in Woodstock should be centred around and any development would be detrimental to the daily lives of a huge number of people. The countryside around Woodstock is extremely valuable and any loss of this countryside is extremely intrusive and damaging for our small community. I am presuming the entry point for this development would be Vermont Drive which is already too narrow to carry existing traffic levels and utilization of this road as an entry point would have a significant impact on its residents particularly during the development of the proposed site. I urge you to consider my comments on this matter along with the comments and thoughts proposed from the wider community. Woodstock has tremendous historic value and is a town which many people feel proud to call home and the ongoing and proposed development is changing the face of our fantastic town.</td>
</tr>
<tr>
<td>MM345</td>
<td></td>
<td>Steve New</td>
<td>Dr New</td>
<td>646</td>
<td>&gt; SECTION 9 - STRATEGY AT THE</td>
<td>Further to my letter dated 8 December, an additional and important consideration has arisen with respect to the inclusion in the Local Plan of land north east of Hill Rise in Old Woodstock. This relates to two additional bus services visiting Vermont Drive, the preferred access to the proposed site. Vermont Drive is 17' wide and about 100 yards long, and is the only access road to the existing Barn Piece estate of 112 houses. As well as resident’s vehicles, delivery vehicles and construction vehicles to the various sites already on the estate, there are currently 10 (Service S3) buses a day, entering Vermont Drive from the A44, reverse in Rosamund Drive and return to Vermont Drive, each bus waiting for a few minutes at the stop there. Whilst a bus or other heavy vehicle is using Vermont Drive, another cannot pass it without using the pavement. On 11 December 2016, the Oxford Bus Company commenced a new bus service (Service 500), operating from Woodstock to Oxford via Kidlington and Summertown. These now visit Vermont Drive on a half hourly basis, often at the same time as the S3 service, with the accompanying difficulty of passing safely. On 3 January 2017, Stagecoach are to commence another new service (Service 7) from Old Woodstock to Oxford, also visiting Vermont Drive at half hourly intervals. Frequent and regular bus services to Old Woodstock are welcome and valuable, but it can be seen that Vermont Drive is to become very busy indeed, before the addition of construction traffic or vehicles associated with a new community on land north east of Hill Rise proposed in the Local Plan. Suggestions that alternative or additional access to the proposed site could be made from the busy and dangerous A44 beyond the boundaries of Woodstock, or by transforming the narrow service road adjacent to Hill Rise, seem costly and impractical in real terms. For many reasons, including those above, this site is seen locally as entirely unsuitable for development, and should be deleted from the Local Plan. I'm writing to offer some views about the proposed changes to the Local Plan - and in particular the idea of more housing in the area to the North/East of Hill Rise in Old Woodstock.</td>
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My concerns regarding any substantial new development are as follows.

The playing field and playground are important local amenities and are central to the life of the local community. For several years local residents have gathered here for informal, fete-like activities (the last was to celebrate the Queen's 90th birthday). These are substantial, community driven local events that involved running races, rounders, cake competitions, Aunt Sally etc, and dozens of local families. We had a display of historical pictures of Hill Rise and the locality by a local historian. My children make and have made extensive use of the little football pitch and the playground - it's the centre of our local lives. Anything that diminished this facility would be a tragedy for the local community.

The field which lies immediately behind Hill Rise is an important recreational amenity in its own right - there is path that leads diagonally across the field which is lined by hollyhocks - I understand these were planted by a local person some years ago to commemorate a deceased friend. For a long period from the summer to the late autumn, the pathway provides a glorious display of colour - it's breathtakingly beautiful - which for many hundreds of walkers, ramblers and joggers forms a joyous passage across to Wootton.

In addition to these issues, I am worried about the expansion of Woodstock housing without a commensurate growth in essential infrastructure and facilities. The primary school in Woodstock is seriously over-subscribed, and the tiny school in Wootton is under sever financial pressure. The secondary school has limited capacity for expansion. The doctor's surgery is strained to the limit. It is becoming impossible to park in Woodstock. In Old Woodstock, we have no shop. The road into Woodstock - the A44 - is a heavily used road with extraordinarily narrow pavements. It is a dangerous road, and there have been accidents: my children are not able to cycle unaccompanied.

Finally, substantial development in the north of Woodstock would undoubtedly result in further congestion into and from Oxford along the A44.

My main concern about the inclusion of the land north east of Hill Rise in the plan is the impact on traffic which is already an issue on this particularly dangerous stretch of the A44. Since living in Old Woodstock there have been some very serious accidents on this road, it is not a safe road to walk alongside or cycle on. An increase in traffic due to significantly increased housing will only increase the risks. The pavements leading into Woodstock are, in places extremely narrow and dangerous (particularly by the Black Prince,) increased traffic will only make this worse. There are many families with children in Old Woodstock which would increase dramatically with 120 new houses, the only way for them to walk to school is along this stretch of the A44.

The primary school in Woodstock is at capacity, as it was when my children started school. We had no choice but to place them at Wootton School, meaning we have had to drive them to and from school every day for the last 6 years, taking them away from their local community, their friends are not in Woodstock, this was not a choice we made for them, we had no choice. Woodstock did increase their intake a few years ago but are again at capacity, with children in Hill Rise again not getting places this year. They have very little room on site to keep on increasing their intake, the school isn't big enough now and this is without any of the new housing that is being planned.

Another concern is the impact increased housing will have on the infrastructure in Woodstock. It is already almost impossible to park in the town. This causes problems, for example getting to the doctors surgery for appointments and being able to shop there.

I would be grateful if you could consider the points above, which I believe make the land north east of Hill Rise an unsuitable place to build new housing.
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<tr>
<td>MM362</td>
<td></td>
<td>Zachary O'Regan</td>
<td>-</td>
<td>O'Regan</td>
<td>675</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>A letter from Zachary O'Regan aged 4 (See attached picture)</td>
</tr>
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</table>
| MM378        | Woodstock Action Group | Woodstock Action Group | Dr               | McGurrin         | 763        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | On the 16 July 2012 the Woodstock Town Council received an eviction notice from solicitors of Caledonia Property, Ltd giving WTC until August 28, 2012 to vacate the children’s playground at Rosamund Drive, Old Woodstock. Mayor Yoxall planned to meet with Mr. Charles Cayzer of Caledonia property, Ltd in September 2012 in an effort to secure the long-term future of the playground area and football pitch.  
(Source: Minutes of WTC Meeting, 14 August 2012)  
Mayor Yoxall reported, “The Town Council is right behind the residents of Old Woodstock in their efforts to resist the possibility of developers Caledonia Land and Property Limited depriving them of their playground . . . but also of possible housing development on the adjoining field.”  

b. Minutes of Annual Town Meeting, 19 March, 2013  
The Mayor (Yoxall) reported that the notice to quit the Old Woodstock Play Area was withdrawn following protests from the Woodstock Town Council and a large number of residents. He also reported that the play area and the adjoining field are being sold to the Blenheim Estates and “so it has had a happy outcome as they intend to preserve both.”  
Unfortunately, this “happy outcome” has become a not so happy outcome as a result of becoming an allocation site in LP2031.  
c) Woodstock Town Council Meeting, 14 May 2013  
On this date the Town Council heard the serious concerns of Hill Rise residents about this proposed development by the Blenheim Estate, owners of this site. A resident’s petition (115 signatures) was presented and forwarded to the WODC. It was RESOLVED that the WTC object to this planning application and found that the proposed development would result in the loss of an important visual gap on the edge of the Woodstock Conservation Area and that it was a “safe access route for children in the Old Woodstock Play Area.”  
NOTE: The “visual gap” referred to is the logical access to the farmland to the rear of Hill Rise owned by Blenheim Estate for the Land North of Hill Rise (120 houses) allocated in Draft LP 2031.  
The site in question is used by residents to access the rear entrances to their properties and for recreational purposes i.e., dog walkers and ramblers. Children use the “gap” to walk to and from the playground avoiding the main road. The proposed allocation would remove the present playground to a more distant site and conceivably alter the safe route that children use to access the play area.  
Since there are no facilities for shopping, medical care or schools at Hill Rise, this would require the need to |
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| MM343         |                         | Stan Scott     | Mr              | Scott             | B22        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I write to suggest that the land bordered by Hill Rise and Vanbrugh Close in Old Woodstock should not be included in the West Oxfordshire Local Plan.  
* The proposed site is remote from the town, and will make a compact, overcrowded area without proper links to the town and other infrastructure.  
* The existing Barn Piece estate has 112 houses, and the proposed new development would more than double that development, making Old Woodstock an overdeveloped area, taken together with Hill Rise and Manor Road (a further 170 existing houses).  
* Old Woodstock has no infrastructure (no shops, no schools or doctors etc) and the proposed site is approximately one mile from the town of Woodstock, accessed only by the already busy A44.  
* Footpaths bordering the A44 between Old Woodstock and Woodstock town are extremely narrow, and pedestrians, including mothers with pushchairs, often seem at risk at present from heavy vehicles and fast moving traffic. More pedestrian and vehicular traffic from the proposed new development would increase safety concerns considerably. (see photos)  
* The primary school in the town is already over-subscribed, and children from the new development would be unlikely to find places there, resulting in car journeys to other towns and villages. For older children, the Marlborough School is almost 2 miles from the proposed site, approached only by the A44 and the town centre. There is no other route to local schools other than the busy A44 with heavy lorries and narrow pavements. |
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<td>MM404</td>
<td></td>
<td>M J Allsopp</td>
<td>-</td>
<td>893</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>The proposed development of the 'Land North of Hill Rise' in Old Woodstock by erecting 120 houses cannot be justified when infrastructure and increased traffic implications are considered. Absence of schools, shops and employment in Old Woodstock would greatly increase traffic in to Woodstock and beyond via the A44. The narrowness of this road and associated footpaths on the descent from Old Woodstock is already extremely dangerous with rear view mirrors (of vehicles) encroaching a head height over the footpaths. Another potential danger is the very high stone wall on the on the left of this descent. The trees planted behind the top of this wall will destabilize the wall by root growth. Vibration caused by traffic obviously increases the significant danger from collapse. Vermont Drive and Rosamund Drive are typically narrow residential roads built in the 1960s and are the only:</td>
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* These aspects alone – lack of infrastructure, limited safe access to the town and overcrowding of the area - make this site unsuitable for a development of this size, I believe.

* The proposed access to the new development via Vermont Drive is also the only access to the existing Barn Piece estate, and a bus route and terminus. It is a residential road, about 100 yards long and only 17 feet wide. The bus service is highly valued locally.

There are 10 buses a day (8 on Sunday) which reverse at the junction with Rosamund Drive, and wait in Vermont Drive for a few minutes each. At the time of bus visits, one way traffic only is possible in Vermont Drive, and HGVs passing the bus have to use the pavement. Vans, lorries, coaches and cars often use the Rosamund Drive and Vermont Drive junction to reverse and turn back towards the town. At busy times, when residents are leaving for work or returning home, Vermont Drive and this junction already cannot cope with existing levels of traffic.

* Vermont Drive is too narrow to support both existing traffic and the extra traffic the proposed development would bring.

* The suggestion that another access to the proposed site could be made from the A44 north of Hill Rise seems impractical. The A44 is too narrow to allow for right turning traffic in a 50mph limit, and major alterations to Hill Rise would be necessary to arrange an opening from the very narrow service road there.

* The children’s play area at the end of Rosamund Drive, now intended for closure to give access to the new development, has a special significance for Old Woodstock residents, and will be a tragic loss. In 2013 it was saved from closure when Blenheim Estates purchased the field, following strong local protest and newspaper coverage. It seems unlikely that the play area, together with its associated half-sized football pitch for children, can be re-located in its present form within the new development so as to be as accessible and popular as it is now.

* Above all, the new development would remove a piece of countryside, with a town to town public footpath running through it, which has become important to all local people, particularly those with houses bordering the field. The footpaths along three sides of the field have been used by local families for decades, as shown by a recent Town Council survey identifying these as well used local paths familiar to local people of the present time and generations past. The loss of countryside to Old Woodstock would be significant and intrusive.

* The prospect of the loss of a well loved green field for overcrowded development seems tragic and unnecessary. More houses are needed, but not just where someone is prepared to sell a green field, development only on carefully considered appropriate sites.
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| MM405 |  | Audrey Allsopp |  | Allsopp | B95 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | vehicular access to the 150 or so houses of the Barn Piece Estate. Even to consider the use of these roads for access to another 120 houses by probably an extra 200 vehicles or more is really beyond belief. Footpaths mounting by vehicles passing one another is already a danger to pedestrians and it should be recognised that the houses of Barn Piece are ideal first or last family homes. Therefore the residents are mainly young or elderly persons.

The above matters, when seriously considered together with other very valid points raised by other objectors, should clearly indicate the totally unsuitable nature of this development and proposed means of vehicular access.

I believe the proposed site for development in Old Woodstock would be a grave mistake and my reasons are as follows.

1) The road on A44 is already dangerous, the road and pavements are narrow and the mirrors on large lorries often overlap the pavements causing pedestrians great risk.

2) Vermont Drive is too narrow for the many large vehicles who invariably use the pavements to pass other cars, lorries and buses. This road is used daily as access for cars, coaches and lorries.

3) The pavement on the fast side of the A44 has a large high wall on which many trees grow and overhang both behind and over this wall, the roots must therefore grow behind and into the wall, causing bulging and will surely cause some form of collapse one of these days.

4) More houses mean many more cars entering Woodstock town where it is almost impossible to park now and difficult to get to the doctors and shops for people who find walking impossible.

5) To cycle, push a buggy or ride on a handicap vehicle in the A44 road to Woodstock town is very very dangerous and for children walking to school almost life threatening as often parked cars make the matter worse.

On the opposite side of the A44 the pavement is almost non-existent in one place.

We need affordable houses but surely safety must come first and foremost.

Thank you for considering this letter. |
| MM407 |  | Clare Evans | Mrs | Evans | B98 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I oppose the proposed development behind Hill Rose for these reasons.

1) This would greatly increase the traffic going towards Oxford. The road is extremely busy, particularly at rush hours, and the extra traffic would further clog up Woodstock town centre, and increase pollution levels.

2) It is claimed that the site has “effective pedestrian and cycle links to the centre of Woodstock.” This is just not true. There is no specified cycle link. There is a very busy, in places very narrow, main road. Large vehicles take up all one side of the road and sometimes stay across the centre. The pavements are narrow, in some places less than 0.79m wide, windows overhang and doorsteps have to be avoided.

3) Parking in Woodstock is impossible at times and even the car park gets full, so people have to go elsewhere for their shopping - more travel - more pollution.

4) Children approaching school age are being turned away from the infants school, thus having to go to schools further afield - more travel in cars. |
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| MM418         |                         | J E Becker     | Mrs             | Becker            | 929        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | 5) Surely we shouldn't be building on good farming land, in such a beautiful area. I thought such areas would be protected and brownfield sites used instead.  
6) The CPRE has questioned the need for all these houses in Oxfordshire.  
I think it is a grave mistake to assume that Woodstock can take yet more housing, when the infrastructure is as strained as it is. It is a unique and historic town and deserves protection. |
| MM420         |                         | Charlotte Evans| Ms              | Evans             | 932        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I am writing to express my deep concern about the proposed development at Hill Rise in Woodstock.  
I moved to my home three years ago, attracted by the community, the facilities and beautiful green surroundings. However, I have already discovered that Old Woodstock already has many problems such as traffic and the infrastructure for schools, doctors etc. Consequently, the increase of 120 more houses fills me with great trepidation.  
The speed and volume of traffic on the A44 is already frightening. Walking into Woodstock on the two very narrow pavements is extremely dangerous. The idea of Vermont Drive being the main entry road is totally preposterous. It is already often difficult to access with cars and the bus entering and leaving.  
We all know that the schools in Woodstock are full to capacity, so where you are planning to place the extra children from new facilities is very puzzling. The doctor's surgery already struggles to cope with the numbers and to provide us with their excellent service. I fear the strain on the staff with such an increase in patient numbers will be devastating.  
We frequently hear from our government and councillors that we need to get children away from computers and out doors exercising. Children here constantly use the park and football pitch - so how hypocritical to suggest removing it.  
We all know that it is very difficult to get the views of residents heard by committees of all kinds, but I implore you to think long and hard about the dreadful impact on the community if you go ahead with the Hill Rise development. |
| MM421         |                         | Richard Evans  | Mr              | Evans             | 935        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 166 | I am aware the WODC are considering the land behind Hill Rise as a potential site for new houses. I believe this area to be very unsuitable for more houses.  
The traffic this would cause on the A44 between Old Woodstock and Woodstock is already very dangerous given the volume of traffic and lack of sufficient pathways.  
My daughter walks to school sometimes, but we are already very worried about the closeness of the vehicles on the road. I myself have seen the HGVs having the mount the curb several times when there is another coming in the opposite direction. |
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<tr>
<td>MM424</td>
<td>Natural England</td>
<td>Marc Turner</td>
<td>Mr</td>
<td>Turner</td>
<td>948</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I am also aware of children in Old Woodstock who aren't being accepted in the primary school, due to lack of spaces. Would a new school be built? In the town centre it is already sometimes impossible to park. Has parking been considered? I appreciate the need for new housing across the county but building behind Hill Rise would strongly compromise safety.</td>
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<tr>
<td>MM428</td>
<td>Stephen John Oliver</td>
<td>-</td>
<td>Oliver</td>
<td>968</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>We believe that the land north of Hill Rise is not suitable for development and should not be included in the West Oxfordshire Local Plan. There are no shops, school, or doctor in Old Woodstock and the A44 into town is too busy now so 120 new homes (240 people plus), cars travelling to places of work and taking children to school would make it even worse. Parking in Woodstock now is bad so more cars would make it much more difficult to park. A44 is a very busy road very fast and very narrow pavements. HGVs now find passing bad and many mount pavements. There are not enough places in the local school, also this proposed site is 2 miles away from Marlborough School. Buses turn in Vermont Drive and Rosamund Drive making the junction very busy at the bus visit times, so more cars turning from A44 into and out of Vermont Drive to get to the proposed site would make this road a nightmare. The children’s play area and football pitch would be lost for many months. Children already travel to school and other amenities and would then not have a play area, and it is unlikely that a new play area would be as safe and easy to access for children as the current site. The new development would remove a piece of countryside which has a public footpath running through. This is most important to local people. The footpaths along 3 sides of the fields have been used for years by locals. Development should be carefully considered an appropriate sites.</td>
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<td>MM432</td>
<td>Maymay</td>
<td>-</td>
<td>Maymay</td>
<td>977</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I would like to oppose the building of 120 homes in the field bounded by Hill Rise and Vanburgh Close in Woodstock for the following reasons: 1) I think Britain and in particular Oxford requires more housing, however, the infrastructure needs to align with the number of houses. There is already a strain on resources in terms of schools and doctors and this will only worsen the situation, 2) The area contains some beautiful landscape wildlife which needs to be protected.</td>
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<td>MM435</td>
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<td>Amelia Evans</td>
<td>-</td>
<td>Evans</td>
<td>980</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>3) The area contains a playground which we use regularly. It will become overpopulated with 120 new houses and unusable if a construction site. I am writing to you because of something I feel passionate about and am concerned about, the plan to build 120 houses at the back of Hill Rise. Firstly the infrastructure of Woodstock isn’t built for a 50% increase in houses, there would be major traffic increasing the risk of serious accidents involving school children walking to and from school. Another very serious problem would be pollution - this would increase dramatically which would affect our health and seeing as the doctor’s surgery can’t support a lot of people would be a struggle. Pollution levels are already over what they should be on the A44. The housing would also affect wildlife and ruin children growing up with the natural world. Overall, I think it’s unrealistic and fictitious to ruin such a wonderful area in which I have grown up for the past couple of years.</td>
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<td>MM437</td>
<td></td>
<td>Margaret Shaw</td>
<td>Miss</td>
<td>Shaw</td>
<td>982</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I do not want you to build houses on the field next to the swings because we came here to live a quiet life and did not come to live a noisy life with lots of traffic and builders. Also I do not want to stop going to the swings and slides for a year.</td>
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<td>MM438</td>
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<td>Columba Shaw</td>
<td>-</td>
<td>Shaw</td>
<td>983</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I do not want the new estates to be built in Old Woodstock because the traffic will be bad. Also there aren’t any other swings and slides near here, and I want to be able to visit them for a year.</td>
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<td>MM439</td>
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<td>Sagnes Shaw</td>
<td>-</td>
<td>Shaw</td>
<td>984</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I solemnly object to making houses on the field because I would NOT want to go to the park for a year and if you did build houses then there would be forever lots and lots of noise and traffic. And we did not move here to listen to cars coming in and out Vermont Drive. We came because its nice and quiet to live in. And the park is good enough already.</td>
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<td>MM440</td>
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<td>Dorothea Shaw</td>
<td>Miss</td>
<td>Shaw</td>
<td>985</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 166</td>
<td>I have heard about the plans for building more houses on the football field, and I do not think it is the right place to do it for the following reasons: We would lose a regular opportunity to meet and play with local residents, which would be prolonged for at least a year. Also, a couple of years ago, a roundabout was added, and at least it would have to be taken down to allow access to the new houses, which would be very upsetting. If a road was constructed, it would be creepy being watched by unfriendly eyes. I have also heard of several accidents on the road to old Woodstock. The extra traffic which the new houses necessitate will dramatically increase them, and the traffic will create a huge amount of noise. My sister and I</td>
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walk into old Woodstock for Christmas shopping, and it would be both annoying and upsetting if we could not carry on for safety reasons. Can you please consider these reasons?

Please don't build on our play park.
The entire child population of old Woodstock play football and hone their skills on the football pitch. You may well be depriving the world its next Rooney or Shearer if you go ahead with plans to build there.

A substantial amount of new housing is proposed as part of these allocations. The Council should also undertake a playing pitch strategy to determine what level of new outdoor and indoor sports provision is required to support the new housing. Please contact Sport England for assistance.

I support the general thrust of the modification to the local plan. In commenting on the SHLAA consultation in February 2016 I urged WaDC to increase its housing allocations to more closely reflect the SHLAA assessment. I am therefore delighted to see a significant increase in housing allocations for Woodstock. Woodstock desperately needs new housing and the infrastructure that it will generate. Woodstock is amongst the most sustainable of West Oxfordshire service centres as demonstrated by the WODC Settlement Sustainability report. However, I believe that the total housing numbers for Woodstock must take account of land in Cherwell District Council which may also be zoned for development. It is not realistic (it is unsound) to view the CDC and WODC proposals in isolation. Woodstock is one community and the District Council boundary does not represent a boundary of local community identity. It is one community and future planning policies must be developed in the light of this reality.

I support the allocation of 670 new homes in Woodstock over the plan period. However, the distribution and location of those homes must be jointly, agreed between WODC and CDC and in further consultation with the local community. It could mean all 670 homes being built on the Woodstock East site (part within WODC and part within CDC) or the total allocations could be split between the sites identified in both COC’s and WODC’s proposed modifications.

"9.5.41t Vehicular access can be achieved via Banbury Road and the site is within comfortable walking and cycling distance of the centre of Woodstock providing the opportunity for effective pedestrian and cycle
Whether or not vehicular access can be achieved with the site interface, this is with a local rural network that is not appropriate for additional traffic generated in this location in order access to and from the strategic network, in this case the A44.

The junction between the A44 and Hensington Road (where the additional traffic would route, as this is also the access to and from Woodstock Town Centre) is a priority junction. For approximately 100 metres leading away from this junction along Hensington Road is a shared surface arrangement capable of a single directional flow of traffic, due to the historical building constraints on either side. This is managed by a give way arrangement at the Union Street end of the scheme; however, there is often conflict as a result of this give way being ignored or misjudged given the length of the scheme. This often results in the footway area being mounted for vehicles to be able to pass, causing conflict with pedestrians. Additional traffic impact resulting from the site can only exacerbate problems with this access to the strategic network and Woodstock town centre that would not be appropriate for a new development.

In terms of the walking and cycling distance of the centre of Woodstock providing the opportunity for effective pedestrian and cycle links being comfortable, this is not the case as areas of the site are over 1km away.

**Manual for Streets** states:

"4.4.1 Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot."

Indeed the closest bus stops at the Marlborough Arms on the A44 are also over 1km away for some of the site and 400m is generally regarded as a maximum acceptable walking distance for bus services.

Cycle facilities are also lacking in the area, connecting the site with the town centre and onward to Bladon Roundabout.

As a result, 9.5.41t is not a factual description of the proposed site allocation north of Banbury Road, Woodstock.

In terms of the statement...

"9.5.41t Importantly a residential scheme in this location would also provide the opportunity to deliver improved vehicular access to the Owen Mumford employment site allowing for a more direct connection between Green Lane and Banbury Road than currently exists."

...it is unclear why a connection through the site would be beneficial to Owen Mumford.

I object to MAIN168 for the reasons given above.
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<td>MM448</td>
<td>Woodstock Town Council</td>
<td>Woodstock Town Council</td>
<td>Mrs</td>
<td>Grant</td>
<td>1041</td>
<td>Sub Area &gt; MAIN 168 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 169</td>
<td>unavoidably involves traffic of all kinds (including pedestrians and cycles) using Hensington Road, which is sufficiently narrow and constrained that it is designed to function as a shared surface. The egress into Oxford Road has limited sight lines, and the capacity of the junction is evidently highly constrained. An alternative route for cars to leave the site involves using Shipton Road, past the Marlborough School. This route is also particularly pressured not least with school buses at school opening and closing times. Footways are of limited width, as is the carriageway itself. Despite the statements made at para. 9.4.41 (u) it appears that transport and access arrangements will need very particular care and attention to avoid the site giving rise to significant traffic impacts. While in landscape and in terms of urban form the site appears relatively unconstrained, movement and access look as if they will need a great deal more careful consideration. The allocation could prove to be sound but Stagecoach has some reservations.</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1091</td>
<td>Sub Area &gt; MAIN 169 &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham</td>
<td>Similarly, the causes of climate change and reduced greenhouse gas emissions will not be addressed through the allocation of this site owing to the likely increased car journeys. Soil and water resources will not be protected or improved as a result of this allocation as it is greenfield. Moreover, the site is designated a Surface Water Safeguard Zone by the Environment Agency. WODC needs to be sure that development will not impact on water quality and resources. The site is again on the edge of a settlement, within close proximity to the Blenheim Palace World Heritage Site, a Registered Park as well as listed buildings. The full impacts have again not been assessed so it is difficult to see how the site can be allocated. This site was also considered during the preparation of the current adopted Local Plan 2011 but was again rejected over highway concerns and impacts on local amenity. Indeed the Inspector in his 2004 report stated that development of the site: “would result in an unacceptable incursion into the open wold landscape to the north of the town. In addition, unlike Housing Proposal 3 (Shipton Road - now built), most of the traffic generated would pass through the town to the detriment of the free flow of traffic and the character of the Conservation Area” Historic England has no comments on the principle of the allocation of Land north of Banbury Road, Woodstock, but we welcome and support criterion d) regarding the setting of the Blenheim Palace World Heritage Site.</td>
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<td>MM456</td>
<td>Sport England</td>
<td>Raymond Cole</td>
<td>Mr</td>
<td>Cole</td>
<td>1127</td>
<td>A substantial amount of new housing is proposed as part of these allocations. The Council should also undertake a playing pitch strategy to determine what level of new outdoor and indoor sports provision is required to support the new housing. Please contact Sport England for assistance.</td>
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<td>MM470</td>
<td>Ms S Hibberd and Mr D Carter</td>
<td>Hibberd and Carter</td>
<td>-</td>
<td></td>
<td>1171</td>
<td>Proposed erection of 250 new houses North of Banbury Road, Woodstock I write in connection with the above planning application. I have examined the plans and I know the site well. I wish to object strongly to the development of these houses in this location. Woodstock is where development proposals should be considered very carefully: infilling could ruin the character of the town while estate development would overwhelm it. The protection of Woodstock's visual, historic and archaeological qualities also need to be taken into consideration and the dangers that would come from increased traffic within these areas. Pressure for development in the town is considerable, mainly for affordable housing and Woodstock has seen many smaller developments over the last 10 years or so. Woodstock was successful in delaying a massive scale build upon the land East of Woodstock (still being considered) and allowing Woodstock to remain a modest town. These new planned sites will dramatically effect the visual aspect, it will clog Woodstock with more traffic, certainly where the Banbury Road site is concerned, due to the narrow roads leading in and out. Obviously the Banbury Road development concerns me the most due to the impact it will have on my surroundings and is also the one that is of most concern. The roads around Banbury Road and Green Lane are very narrow, we see these roads overly parked on and very dangerous to manoeuvre around due to the lack of parking areas within Woodstock. There are many larger vehicles that need to access Owen Mumfords, which leads them to commute through Woodstock and down Green Lane. There are also area's along Green Lane that have no pavements/footpaths for pedestrians to safely walk on and this road is used frequently by local school children on their way to and from school. We are aware that being neighbours to Blenheim Palace that surrounding areas within 5 miles of the heritage site all belong to Blenheim and that Blenheim will profit very well by giving up much of its green space for developers, however, a better and mature outlook needs to be considered when choosing sites to develop, rather than the unnecessary need to just throw houses here, there and everywhere. The council are considering a massive influx of houses in Woodstock and even though people aren't naive to the knowledge that houses need to be built and government targets need to be met, there is no excuse for ignorance in small local areas. There is no need for this kind of open market housing in the Town. Woodstock already, has enough large...</td>
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houses, it has had numerous small developments in and around Woodstock, which the town has just about coped with. These being; a big development by the Marlborough School which has seen an increase of traffic on Shipton Road, again another very narrow road which is right by the main school. This development has been extended and is still under construction, which resulted in the loss of one of our local fields. A smaller separate development of land by the swimming pool. A new close development by the Banbury Road, giving actual affordable houses to residents. The Chiropractic Clinic by the top of Bear Close developed into apartments. The area by the primary school, demolishing the old railway line, again turned into apartments. The garage in Woodstock town was turned into a new housing site, as well as many individual houses being upgraded.

Woodstock needs a better infrastructure set in place before any new developments are considered, the actual town itself is unable to cope with demand of the local people and therefore they commute to other areas. On a daily basis Woodstock is jammed packed with parked cars, buses and large vehicles trying to manoeuvre around a small market town. The main parking area for Woodstock is too small to cope with already increasing traffic, with the overspill of vehicles parking down small side streets and roads. Blenheim could consider an additional parking area within its grounds, just off of the A44 by the current bus stop outside of their main entrance, this would coincide with their current parking for the visitors, this could be “hidden” by dry stone walling, keeping the look of Woodstock intact and would hopefully scrap plans of a park and ride service like the one in Kidlington, which I can only see as killing off Woodstock, due to no visitors needing to visit the small town.

A better site for Old Woodstock Town football club could be better suited on the Hill Rise site, giving them better facilities and parking for club members and could be paired with a better recreational ground for local residents near that area of Woodstock. This wouldn’t put an over whelming stain on the already busy roads and would again give something to the town instead of repeatedly taking away for businesses to profit.

The current site for the football club, could then be better suited to a more up to date community centre, housing halls for local clubs and offices and perhaps a better space for a doctors surgery, the field adjacent to the youth club building could be planned out better, with half the field for parking and the other half a better recreational ground for children. This would free up space by the tennis club and could be a possible site for homes with traffic accessing and exiting out onto Cadagan Park. New buildings could go into the space that is currently the community centre and where the doctors surgery is currently housed.

Better parking facilities should be considered with Woodstocks main car park. Obviously the current police station is due to vacate the area once plans have been put in place.

This is another potential site for better parking facilities and again a smaller housing scheme could be considered within this area.

The housing that is proposed for the land South-East of Woodstock by the Bladon roundabout will be the big development to benefit Blenheim financially, allow the council to tick off boxes and show development within this small area and give local and new residents housing that is needed. However, this site will need to be better thought out, as parking will need to be adequate for the housing placed here and forethought to the extra people that will visit these houses. A proper recreational area for children and possible amenities need to be considered for residents. The impact of the increased traffic will have a massiveand negative effect on both Woodstock and Bladon, these roads are already over used and even the slightly increase will have a big impact on these areas.

The proposed sitings of Hill Rise and Banbury Roadis particularly ill-considered: it is on a greenfield site used
by many of the towns people, people from neighbouring areas and tourists for recreation. It is also home to a lot of wildlife that have made this area their home for many years, there are many species of birds, game and is also home to bats and their numbers are decreasing dramatically due to all of the developments being undertaken within this country. It is considered a safe and peaceful place for people to walk their dogs and one of the only places left that dogs are able to run off the lead without the restrictions of built up areas. It is also one of the few remaining areas where children can play and appreciate nature and building here would both diminish the striking view of the town from the fields, will disrupt the calming and safe surrounding for wildlife and will become another victim to development.

Future planning proposals also need to consider the risk of flooding new areas, due to over developed sites more and more areas are falling victim to flooding due to no longer having the surrounding fields around to absorb the increased rainfall.

I support the general thrust of the modification to the local plan. In commenting on the SHLAA consultation in February 2016 I urged WaDC to increase its housing allocations to more closely reflect the SHLAA assessment. I am therefore delighted to see a significant increase in housing allocations for Woodstock. Woodstock desperately needs new housing and the infrastructure that it will generate. Woodstock is amongst the most sustainable of West Oxfordshire service centres as demonstrated by the WODC Settlement Sustainability report. However, I believe that the total housing numbers for Woodstock must take account of land in Cherwell District Council which may also be zoned for development. It is not realistic (it is unsound) to view the CDC and WODC proposals in isolation. Woodstock is one community and the District Council boundary does not represent a boundary of local community identity. It is one community and future planning policies must be developed in the light of this reality.

I support the allocation of 670 new homes in Woodstock over the plan period. However, the distribution and location of those homes must be jointly, agreed between WODC and CDC and in further consultation with the local community. It could mean all 670 homes being built on the Woodstock East site (part within WODC and part within CDC) or the total allocations could be split between the sites identified in both COC’s and WODC’s proposed modifications.

5) Policy EW1e – land north of Banbury Road, Woodstock
Policy EW1e: We support the allocation of land north of Banbury Road, Woodstock for around 250 homes.
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<td>&gt; Eynsham Woodstock Sub Area &gt; MAIN 169</td>
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<td>A requirement to ensure no harm to heritage assets is in direct conflict with national policy, which establishes in Chapter 12 of the Framework that less than substantial harm to a heritage asset should be weighed against public benefits arising.</td>
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<td>Hill Rise is a sustainable site in a sustainable location. Its development will contribute towards the sustainable growth of Woodstock and provide for much needed housing in the area.</td>
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<td>Together with other sites allocated for development around Woodstock, the development of this site will make a major contribution towards the improvement and enhancement of local infrastructure and result in significant social, economic and environmental benefits.</td>
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<td>The site is readily available and there are no significant constraints to development. Consequently, it will be delivered during the Plan period.</td>
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<td>The site is readily accessible and appropriate investment in local highway improvements, including Hensington Road, will ensure safe and secure access and that there will be no severe residual cumulative impacts of development, having regard to Paragraph 32 of the Framework. For example, detailed design and modelling work is being undertaken to demonstrate that initial issues raised by Oxfordshire County Council in respect of the site will be appropriately addressed.</td>
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<td>Also, as above, there is an opportunity for the sites allocated around Woodstock to be linked together, as they are all in one ownership. This presents the opportunity to deliver a joined up approach to the delivery of infrastructure and services, to further enhance the long term sustainability of the settlement.</td>
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<td>The land around Woodstock is owned by Blenheim Estates. Blenheim is an integral part of Woodstock and has been for many Centuries. Blenheim Estates adopts a multi-generational approach to all of its land and property - as can be seen by the exceptional land management and the sensitive Blenheim Estates developments throughout the area.</td>
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<td>This is a fundamental point. This site, together with others around Woodstock, can be brought forward in a manner which ensures associated investment into all of the things that make a place sustainable. It is in Blenheim Estates direct interest (and forms the reason for its existence) to invest into Woodstock. The success of Woodstock and that of Blenheim are intertwined.</td>
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<td>Blenheim Estates is well placed to ensure that development will be brought forward to enhance the sustainability of Woodstock as a whole. Piecemeal development will be avoided and the combined development of the allocated sites will result in major investment into local infrastructure, facilities and services. For example, a 200 house development could only make a contribution to education, whereas, together, the delivery of say, 770 dwellings, can ensure the provision of a new primary school. This approach can be adopted to all manner of things and given that Blenheim Estates has other strategic landholdings within Woodstock, the allocations can help to release associated opportunities – for example, new community facilities in the town centre and new community facilities for the historic, but threatened, Woodstock Football Club.</td>
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<td>Blenheim Estates has many years of experience as a progressive landlord and intends to become a significant provider of affordable housing. This, combined with the Blenheim Estates' record as a provider of developments of the highest design quality and exceptional property management, will help to ensure that the land allocations support a long term legacy, enabling people of all backgrounds to enjoy the unique characteristics of the area.</td>
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| MM753         | David Wilson Homes Southern | David Wilson c/o Barton Willmore | Homes Southern | 2033 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 169 | Land North of Banbury Road, Woodstock (250 Homes) Objection is made to the inclusion of this site given the impact on setting (in particular important views of the Column of Victory) the Blenheim Palace World Heritage Site. As explained in Paragraphs 9.5.58-62, Blenheim Palace is set in a park designed by Capability Brown, regarded as a master piece of the highest order. In particular, the site lies within one of two areas identified in the Blenheim Heritage Management Plan as significant in terms of views to and from the World Heritage Site (shown on Figure 9.16a Key Views). Whilst the draft policy acknowledges the need for development to not have a harmful impact on the setting of the World Heritage Site, including key views, the policy and supporting text fail to acknowledge that the site lies within one of the key views. The key is that the ‘precautionary principle’ should be applied, because there are reasonable alternatives, for example at Carterton.

The Framework is clear that when considering the impact of a proposed development on the significance of the designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Substantial harm to World Heritage sites should be wholly exceptional - i.e. avoided where ever possible. UNESCO’s Operational Guidelines seek protection and management of World Heritage Site (WHS) properties and suggest designation of an “adequate buffer zone” with legal and/or customary restrictions placed on its use and development, wherever this may be necessary, to protect the “the immediate setting” of a WHS and also “important views and other areas or attributes that are functionally important as a support to the Property”.

The Column of Victory, to the north of Blenheim Palace, is Grade II Listed and identified in the Blenheim Palace Heritage Management Plan as the object of an important view from locations to the east including Land North of Banbury Road, Woodstock, which largely lies within the ‘Important view into the Park from Woodstock towards the Column of Victory’ identified on Figure 8 of the Blenheim Heritage Management Plan (May 2006) with just the north-western extent lying outwith the ‘Important View’ view cone.

It is likely that the zone of theoretical visibility from the Column (approximately 41m in height) extends across the majority of Land North of Banbury Road, Woodstock. Development on Land North of Banbury Road could therefore have a harmful impact on views toward the Column of Victory from publicly accessible locations on Banbury Road. A Public Right of Way runs through Land North of Banbury Road and to the further north-east, and the Column could also be partially visible from this location. The Council needs to provide an evidential case to demonstrate that this site can either be developed without adverse impact on this heritage asset, or the proposal should be omitted from the Plan.

As a consequence, MM167 and the map (Figure 9.15e) MM168 and MM169 (Policy EWle) should all be deleted. This change is required to ensure consistency with national policy with particular regard to the impact on the World Heritage site key view.

| MM752         | Bloombridge               | Mr Cutler          | 2034 | > SECTION 9 - STRATEGY | Land North of Banbury Road, Woodstock (250 Homes) Objection is made to the inclusion of this site given the impact on setting (in particular important views of the Column of Victory) the Blenheim Palace World Heritage Site. As explained in Paragraphs 9.5.58-62, Blenheim Palace is set in a park designed by Capability Brown, regarded as a master piece of the highest order. In particular, the site lies within one of two areas identified in the Blenheim Heritage Management Plan as significant in terms of views to and from the World Heritage Site (shown on Figure 9.16a Key Views). Whilst the draft policy acknowledges the need for development to not have a harmful impact on the setting of the World Heritage Site, including key views, the policy and supporting text fail to acknowledge that the site lies within one of the key views. The key is that the ‘precautionary principle’ should be applied, because there are reasonable alternatives, for example at Carterton.

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As a consequence, MM167 and the map (Figure 9.15e) MM168 and MM169 (Policy EWle) should all be deleted. This change is required to ensure consistency with national policy with particular regard to the impact on the World Heritage site key view. |
views of the Column of Victory) the Blenheim Palace World Heritage Site. As explained in Paragraphs 9.5.58-62, Blenheim Palace is set in a park designed by Capability Brown, regarded as a master piece of the highest order. In particular, the site lies within one of two areas identified in the Blenheim Heritage Management Plan as significant in terms of views to and from the World Heritage Site (shown on Figure 9.16a Key Views). Whilst the draft policy acknowledges the need for development to not have a harmful impact on the setting of the World Heritage Site, including key views, the policy and supporting text fail to acknowledge that the site lies within one of the key views. The key is that the 'precautionary principle' should be applied, because there are reasonable alternatives, for example at Carterton.

The Framework is clear that when considering the impact of a proposed development on the significance of the designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Substantial harm to World Heritage sites should be wholly exceptional - i.e. avoided where ever possible. UNESCO’s Operational Guidelines seek protection and management of World Heritage Site (WHS) properties and suggest designation of an “adequate buffer zone” with legal and/or customary restrictions placed on its use and development, wherever this may be necessary, to protect the “the immediate setting” of a WHS and also “important views and other areas or attributes that are functionally important as a support to the Property”.

The Column of Victory, to the north of Blenheim Palace, is Grade II Listed and identified in the Blenheim Palace Heritage Management Plan as the object of an important view from locations to the east including Land North of Banbury Road, Woodstock, which largely lies within the ‘Important view into the Park from Woodstock towards the Column of Victory’ identified on Figure 8 of the Blenheim Heritage Management Plan (May 2006) with just the north-western extent lying outwith the ‘Important View’ view cone.

It is likely that the zone of theoretical visibility from the Column (approximately 41m in height) extends across the majority of Land North of Banbury Road, Woodstock. Development on Land North of Banbury Road could therefore have a harmful impact on views toward the Column of Victory from publicly accessible locations on Banbury Road. A Public Right of Way runs through Land North of Banbury Road and to the further north-east, and the Column could also be partially visible from this location. The Council needs to provide an evidential case to demonstrate that this site can either be developed without adverse impact on this heritage asset, or the proposal should be omitted from the Plan.

As a consequence, MM167 and the map (Figure 9.15e) MM168 and MM169 (Policy EWle) should all be deleted. This change is required to ensure consistency with national policy with particular regard to the impact on the World Heritage site key view.

In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being.
Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

Woodstock – Land North of Banbury Road

There may be hydrological issues relating to Glyme Valley and downstream the Queen Pool SSSI and Woodstock Water meadows.

There will be a need for additional investment in Woodstock Water meadows to ensure the site is able to meet the increased recreational access demands this development would generate.

The location of this site is removed from the primary road network and has several access constraints. Hensington Road is unable to accommodate an increase in traffic flows due to the road width constraint at the junction with A44 Oxford Street. Brook Hill and Upper Brook Hill are similarly constrained by width. The site is unlikely to be served by a direct bus service and is around 700m from the A44 bus stops, and Woodstock facilities, which is beyond desirable walking distances to access public transport.

Whilst access could be provided from Banbury Road many trips are likely to be attracted to the A44, rather than Banbury Road.

The county has severe concerns about access to the site, and objects to the site based on the current information.

b) provision of satisfactory vehicular access from Banbury Road and Green Lane and appropriate pedestrian and cycle connections including incorporation of the existing public right of way across the site.

In terms of MAIN169 (Policy EW1e – Land north Banbury Road, Woodstock – Land to the north of Banbury Road, Woodstock to accommodate around 250 dwellings as a well-integrated and logical extension of the existing built form of the town.) I do not agree that the site is a ‘well-integrated and logical extension’ for the reasons given above.

I do not believe that...

"b) provision of satisfactory vehicular access from Banbury Road and Green Lane and appropriate pedestrian and cycle connections including incorporation of the existing public right of way across the site."

...is possible given the reasons given above. Green Lane is also rural lane in nature and only allows for single directional flow in places.

The scope of the Evaluation of Transport Impacts November 2016 evidence base is to “identify locations where the committed future transport network is modelled to come under stress and cannot support additional demand associated with Local Plan growth without appropriate mitigation.” It does not assess whether access to the sites are appropriate. There is also a difference in what was modelled for the “Land north of Banbury Road” site in this document (150 dwellings) and what is proposed through the allocation (250 dwellings), as shown in 4.1. Land-use assumptions.

The Infrastructure Delivery Plan states "3.3 Traffic volumes are highest on the A40 between Witney and Oxford and the A44 south of Woodstock to Oxford. The most severe congestion is on the A44 at the Bladon roundabout and on the A40 to the east of Witney, particularly during the morning peak hours.

However, no infrastructure is proposed to mitigate this in light of the development proposed in Woodstock as a result of the modifications.
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| MM306         |                         | Phillip Allen   | -                | 527        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 169 | It also states: "3.55 Car parking is also under pressure in popular tourist towns such as Burford and Woodstock where there is extremely limited capacity, particularly at weekends. However, as the car parking demand is mainly created by tourists, additional housing in these towns is unlikely to have a significant impact on parking demand."

I disagree with this statement in terms of additional housing being unlikely to have a significant impact and I would like to know what the evidence base for this statement is? A commitment to look at additional parking is not an appropriate measure to mitigate this, as it is a historic centre with little or no potential to increase the parking supply given the current constraints as far as I'm aware, as a Woodstock resident.

In the Sustainability Appraisal Addendum Report it states:

"4.77 Policy EW1c Land East of Woodstock; Policy EWd Land North of Hill Rise, Woodstock; Policy EW1e Land North of Banbury Road, Woodstock:

Although each nonstrategic site allocation is relatively small, there is the potential for them to contribute to cumulative negative effects for landscape and transport in this sub-area – with uncertainty in the longer-term and until further detailed project level studies have been completed."

This ‘uncertainty’ has not been investigated and so the evidence base on the appropriateness of these sites is incomplete. No mitigation measures are proposed to resolve this uncertainty or any negative effects identified through the SA.

In conclusion, Policy EW1e is not acceptable in transport terms, given the site’s current context. |
| MM378         | Woodstock Action Group | Woodstock Action Group | Dr McGurrin | 765        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 169 | We are writing to comment on the proposal to build 250 houses on the land north of Banbury Road, Woodstock.

We live at 22 Green Lane, so will be strongly affected by the development.

Our main concerns are:

* Green Lane is partially single track, and is heavily used by pedestrians. Parents and children use the road to walk to the two schools (Woodstock Primary and Marlborough School). There is already a safety hazard for pedestrians on Green Lane – any increase in vehicular traffic resulting from the housing development proposed would be unimaginable.

* At present, we have open views across countryside from 22 Green Lane. We understand that there are genuine housing needs locally and that the tranquility and open views cannot be maintained indefinitely. We would ask, however, that any new development is restricted in density and elevation, and that new houses are not built close to the boundary of our property. |

A Public Inquiry was held between 6 July 2004 and 6 January 2005 concerning objections made to the WODC Local Plan 2011. The Public Inspector, Mr. Mattocks, in relation to the issue: The impact of the development of land to the north of Banbury Road on the setting of the town, concluded "Development here . . . would result in an unacceptable incursion into the open wolds landscape to the north of the town. In addition, . . . most of the traffic generated would pass through the town to the detriment of the free flow of traffic and the character of the Conservation Area."
WAG concurs with the Inspector’s conclusion, as this is still be the case.

This proposed allocation, if activated, will result in the loss of open space and important agricultural land. It will cause visual encroachment on, and the loss of public views across open fields, in effect, an over domination of the landscape and skyline along the northern approach to the town.

It will erode the local historic character and attractiveness of Woodstock. Traffic and road safety problems will increase along the dangerous bend on Banbury Road. This road is already a “one-way” system due to dozens of cars parked alongside one side of the road.

The fields along this stretch drain onto the road in periods of heavy rainfall and melting snow causing surface flooding. Increased traffic means more noise levels and exhaust emissions and consequent air pollution with cumulative lung damage.

Walkers using a nearby public footpath will be put at greater risk.

In January 2003, WODC reported that the Banbury Road site should be dismissed because of constraints of access as well as the quality of the agricultural land.

More specifically, the Banbury Road allocation meets the same NPPF critical criteria as the Hill Rise one, viz, Ch. 4, paras. 29, 30, 32, 34 and 37. In addition, para 35: Potential residents would not “have access to high quality public transport facilities.” as there are no public transport services in this area.

The Hensington Road approach to the town centre and the A44 is constricted by a narrow “pinch point” at its junction with the A44.

This proposed allocation is a non-starter and as such, WAG calls for its deletion from the finalized Local Plan 2031.
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1092</td>
<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 171</td>
<td>proposed development. We consider there to be considerable scope for additional development in the village, therefore further developments should be permitted on suitable sites including the former quarry.</td>
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<tr>
<td>MM455</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
<td>-</td>
<td>Commercial Estates Group</td>
<td>1165</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>The proposed site at Myrtle Farm, Long Hanborough is within the setting of the Long Hanborough Conservation Area. As a designated heritage asset, great weight should be given to its conservation in accordance with paragraph 132 of the National Planning Policy Framework and any development of this site should therefore conserve or enhance the special interest, character and appearance of the Conservation Area as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework. This should be a criterion in Policy EW11.</td>
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<tr>
<td>MM509</td>
<td>Andrew Hewlett</td>
<td>Mr</td>
<td>Hewlett</td>
<td></td>
<td>1254</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>Myrtle Farm, Long Hanborough.</td>
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<td>MM509</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>1. The vehicular and pedestrian access by way of Swan Lane, which also gives access to other villages, is restricted and limited.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>2. The Corn Hide development was a rural exception site, being a site which would not normally be used for housing. So how can land adjacent to Corn Hide now be considered suitable for housing development.</td>
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<tr>
<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
<td>-</td>
<td>Cantay Estates</td>
<td>1957</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>MAIN171, 172, 173, 174: The proposed developments have greater scope to impact upon heritage assets the proposed development sites than alternatives in the village, particularly the former quarry to the west. We also understand Myrtle Farm to be in multiple ownerships and some parties may not be supportive of the proposed development. We consider there to be considerable scope for additional development in the village, therefore further developments should be permitted on suitable sites including the former quarry.</td>
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<tr>
<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2009</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>This representation is made in respect of the sustainable settlement of Ascott under Wychwood, which is in the 'village' tier of the Plan's Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>Land &amp; Partners Ltd (L&amp;P) is a privately owned development company which has identified Ascott under Wychwood as a sustainable location for development. A summary of the company’s approach to development is outlined in Section 2.0. L&amp;P objects to Main Modifications 15, 16, 27, 30 and 172 of the current consultation, as set out below.</td>
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<tr>
<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2032</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>We object to the allocation of this site for 50 dwellings as the landowner is unwilling to bring the site forward for development. As a result, the allocation is not based on a robust and credible evidence base and should be deleted.</td>
</tr>
<tr>
<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2063</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>This representation is made in respect of the sustainable settlement of Long Hanborough, which is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. We propose that additional sites are allocated in the Local Plan to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text. Land &amp; Partners Ltd (L&amp;P) is a privately owned development company which has identified Long Hanborough as a sustainable location for development. A summary of the company’s approach to development is outlined in Section 2.0. We object to the allocation of this site for 50 dwellings as the landowner is unwilling to bring the site forward for development. As a result, the allocation is not based on a robust and credible evidence base and should be deleted.</td>
</tr>
<tr>
<td>MM766</td>
<td>Land and Partners Ltd</td>
<td>Tom Hutchinson</td>
<td>Mr</td>
<td>Hutchinson</td>
<td>2086</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>This representation is made in respect of Land between Witney Road and High Street, Finstock. This site is Ref: 267 in the Strategic Housing Land Availability Assessment (SHLAA). The site lies outside the AONB. The owners of the site are willing to make the site available for housing development, as recorded in the SHLAA. We disagree with the assessment of suitability in the SHLAA for the reasons set out in Section 4.7. Finstock is in the ‘village’ tier of the Plan’s Settlement Hierarchy (Table 4.1, p35) where development will be supported where it respects the village character and local distinctiveness and would help maintain the vitality of the local community. Our promoted site at Finstock would accord with the above criteria and we propose that the site is allocated to secure the delivery of new housing on suitable/available sites as sought by proposed Policy OS2 and the relevant supporting text. Land &amp; Partners Ltd (L&amp;P) is a privately owned development company which has identified this site as a sustainable location for development. L&amp;P has reputation for engaging with the local community and securing high quality design, tailored to the local context. Negotiations are progressing with the landowners and the intention is to engage with residents and the Parish in early 2017. Objection to Main Modification 172 – Policy EW1F Land at Myrtle Farm</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2182</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>We object to the allocation of this site for 50 dwellings as the landowner is unwilling for development. As a result, the proposed allocation is not based on a robust and credible evidence base and should be deleted.</td>
</tr>
<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2206</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>Long Hanborough Oxfordshire County Council is concerned about the change in definition for Long Hanborough and considers that it should remain included in the Plan as a rural service centre. Long Hanborough has its own facilities and institutions, has fairly good bus links to Witney and Woodstock, and significantly has a railway station, all of which create conditions for allocated residential development, ideally bridging the gap between the railway station and the village centre.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2268</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>Ecology and Natural Environment In all cases reference should be made to the District Council's ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species. The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary. Long Hanborough – Land at Myrtle Farm This site is on high ground and as such may have an impact on the setting of the Cotswolds AONB to the north. There are a range of priority habitats in the nearby Evenlode Valley. Wychwood and Evenlode Valley Conservation Target Area lies to the to north. There is potential for development related investment in the CTA and around Combe Mill. There is a potential threat from increased recreational use of nearby Pinsley Wood ancient woodland.</td>
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<tr>
<td>MM788</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr Murray and Mr Blackwell</td>
<td>Mr</td>
<td>Murray and Blackwell</td>
<td>2311</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 172</td>
<td>Main 172 – Policy EW1F Land at Myrtle Farm b) provision of satisfactory vehicular access and appropriate pedestrian and cycle connections.</td>
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2.28. The landowners object to the allocation of the site for 50 houses and seek its deletion from the Plan, as its allocation is unsound. This is because the site is not supported by the evidence base, principally that being the latest iteration of the SHLAA.

2.29. The site SHLAA Reference is 314, and it is documented that the site was dismissed through the previous Local Plan for the following reasons:
“Local Plan Inspector recommended the site not be allocated in June 2005 because not needed and because harmful to the character and setting of the village, the landscape of the river valley and the setting of the Millwood End Conservation Area.”

2.30. Furthermore, the SHLAA goes onto note that:
“Within open valley side farmland of Lower Evenlode Valley which is visually sensitive and where development would be highly prominent and exposed (WOLA). The village is historically a linear development along a ridge which still affords views from Main Road (and along Churchill Way) over the grounds of Christ Church to countryside beyond. These views are framed by the Church and buildings of Myrtle Farm (and to a lesser extent from recent development in Corn Hide). Development of the site would destroy those views. It would also be prominent on the skyline in views from the valley to the north but not in longer distant views from higher ground further north.”

2.31. And finally, provides a commentary on the site’s overall capacity “c30 if built development were limited to the eastern part to limit loss of open views,”

2.32. Clearly, the issue with this allocation is that previous assessments of the site by a Local Plan Inspector have shown that this site has considerable issues in principle. Whilst the policy context for development has changed considerably since 2005, the underlying concerns of landscape impact and conservation area impact remain broadly the same, irrespective of the need to provide housing. As drafted, the SHLAA does not support an allocation of the site, let alone an allocation of this size.

2.33. On a final point, it is understood, albeit anecdotally, that the landowner is unwilling to sell the site for development. Is there any evidence in the SHLAA or held by the Council, which confirms that there is an on-going dialogue with the owner/promoter of the site, which means that the site will be delivered over the plan period?

2.34. As a result, the allocation is not based on a robust and credible evidence base and should be deleted as a result because it is unsound. In light of these concerns, there is a need to consider an alternative site to make up the shortfall in delivery in the village.

In short, I've been struck by the speed at which building application approvals have been granted. I'm concerned about the general lack of thought given to the development of Long Hanborough and I ask that the process be slowed down in order to deter spivs from taking advantage of the council's need to build.

I stayed in Oxfordshire after completing my degrees because of the opportunities the area affords. Hence, I understand why people would like to live here and it's right that the council make preparations for this. Additionally, we've owned our property for 18months and we understand it's very difficult to find an affordable home.

While the district as a whole is expected to grow by 34% by 2031 according to your revised plans, the building works already granted or applied for at Long Hanborough amount to a 41% increase in the town's population all likely to happen within a few years. Why is this happening so fast? How is the town meant to cope unless given a chance for services, roads, shops and transport to meet demand?

Most worryingly, while I think the Oliver's Garage site makes sense, the proposed build on Dix Pit strikes me as being an example of everything planning shouldn't allow: an SSSI; hazardous waste in the back-filled pit; overlooked by many local homes; and they'd be covering an obvious source of drainage for everything that surrounds it given its lower elevation. This is a classically awful choice for new homes, but according to the developers, they have an 'expert who believes otherwise' for all of the points I mentioned above (their local
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| MM424         | Natural England         | Marc Turner     | Mr               | Turner            | 950        | > SECTION 9  
> STRATEGY AT THE LOCAL LEVEL  
> Eynsham Woodstock Sub Area > MAIN 172  
Main171, 172, 173, 174: The proposed developments have greater scope to impact upon heritage assets the proposed development sites than alternatives in the village, particularly the former quarry to the west. We also understand Myrtle Farm to be in multiple ownerships and some parties may not be supportive of the proposed development. We consider there to be considerable scope for additional development in the village, therefore further developments should be permitted on suitable sites including the former quarry. |
| MM756         | Cantay Estates          | Cantay Estates  | -                | Cantay Estates    | 1958       | > SECTION 9  
> STRATEGY AT THE LOCAL LEVEL  
> Eynsham Woodstock Sub Area > MAIN 173  
Main171, 172, 173, 174: The proposed developments have greater scope to impact upon heritage assets the proposed development sites than alternatives in the village, particularly the former quarry to the west. We also understand Myrtle Farm to be in multiple ownerships and some parties may not be supportive of the proposed development. We consider there to be considerable scope for additional development in the village, therefore further developments should be permitted on suitable sites including the former quarry. |
| MM756         | Cantay Estates          | Cantay Estates  | -                | Cantay Estates    | 1959       | > SECTION 9  
> STRATEGY AT THE LOCAL LEVEL  
> Eynsham Woodstock Sub Area > MAIN 174  
Main171, 172, 173, 174: The proposed developments have greater scope to impact upon heritage assets the proposed development sites than alternatives in the village, particularly the former quarry to the west. We also understand Myrtle Farm to be in multiple ownerships and some parties may not be supportive of the proposed development. We consider there to be considerable scope for additional development in the village, therefore further developments should be permitted on suitable sites including the former quarry. |
| MM455         | Commercial Estates Group| Commercial Estates Group | - | Commercial Estates Group | 1212       | > SECTION 9  
> STRATEGY AT THE LOCAL LEVEL  
> Eynsham Woodstock Sub Area > MAIN 175  
Main 175 Policy EWIg – Land at Oliver’s Garage, Long Hanborough  
As set out in our representations to Table 9.4, whilst we take no issue with the principle of housing development on this site, to avoid double-counting the allocation should either be deleted or, preferably, the windfall allowance reduced by 25 homes. |
| MM786         | Oxfordshire County Council | Amada Jacobs (OCC) | Mrs | Jacobs            | 2207       | > SECTION 9  
> STRATEGY AT THE LOCAL LEVEL  
> Eynsham Woodstock Sub Area > MAIN 175  
Ecology and Natural Environment  
In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.  
The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of |
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2269</td>
<td>benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary. Long Hanborough – Oliver’s Garage There is a potential threat from increased recreational use of nearby Pinsley Wood ancient woodland. There is the potential for bat roosts in existing buildings.</td>
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<tr>
<td>MM745</td>
<td>Gladman Developments Limited</td>
<td>Richard House</td>
<td>Mr</td>
<td>House</td>
<td>1799</td>
<td>e) provision of satisfactory vehicular access and appropriate pedestrian and cycle connections. We suggest the following changes to ensure this policy is in line with LTP4. Suggested text to replace point ‘e)’: provision of satisfactory vehicular access, provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians, and cyclists with links to key destinations including integrating with Long Harborough village, Hanborough Station and interurban cycle routes. Provision of individual Travel Plan (and associated Travel Information Packs) for the residential and employment areas. The County Council has experienced significant difficulties in securing appropriate mitigation measures for the impact of strategic development areas where portions of the site have come forward as separate planning applications. To help reduce the occurrence of this issue we propose this additional text: The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2270</td>
<td>MAIN 176 11.1 Gladman supports the proposed allocation of land at the former Stanton Harcourt Airfield for 50 homes. Gladman has an interest in this site and is promoting its development for residential development. An outline planning application has been submitted to West Oxfordshire Council for a development on this site of up to 50 dwellings and up to 450 sqm of office space, green infrastructure and public open space. Gladman can confirm that, subject to planning permission being granted, the site would be immediately made available for development.</td>
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<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>1023</td>
<td>MAIN 178 9.5.42g The site has no major physical or policy constraints to prevent development coming forward and comprises previously developed land (in part) in a relatively sustainable location with good access to a range of local services and facilities. The site is the subject of a current planning application. This allocation is in a village that currently does not sustain a regular bus service following the termination of services funded by Oxfordshire County Council in July 2016. Given baseline levels of demand for the hourly service previously operated were entirely insufficient to justify retaining a service on this route on a commercial basis, we would advise that it is quite unlikely that a relevant public transport service could be sustained commercially (through passenger usage) at this stage, even with 50 additional houses, unless a high</td>
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**MAIN 178** degree of mode shift towards bus is achievable in the wider area.

This might conceivably be possible following the completion of Eynsham Park and Ride and the improvement of bus services via the Park and Ride to Oxford, following the completion of the A40 Science Transit Phase 1; but this is far from assured.

It is not inconceivable that a feeder service might be sustainable at some point in the future from Bampton and intervening settlements to a future Eynsham Park and Ride, but we would advise that it should be assumed that site would be all but entirely car-dependent.

Stagecoach notes that a live planning application is awaiting determination for this site. We would advise that this site does not represent a development strategy that makes the fullest possible use of public transport, and that other options in the Sub-area can better meet housing need while offering a full range of credible travel choices.

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**MM451** Historic England welcomes and supports criterion d) of Policy EW1h regarding any features of historic significance to the former role of the site as an airfield. However, the site is adjacent to the Stanton Harcourt Conservation Area and potentially within the setting of the Devil's Quoits scheduled monument and we believe that there is a strong likelihood of nationally important archaeological remains on the site.

As designated heritage assets, great weight should be given to the conservation of the Conservation Area and scheduled monument in accordance with paragraphs 126 and 132 of the National Planning Policy Framework. Any development of this site should therefore conserve or enhance the special interest, character and appearance of the Conservation Area and significance of the monument as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the Framework. There should be a criterion to this effect in Policy EW1h and a requirement for an archaeological investigation to inform the development.

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**MM627** The Stanton Harcourt Estate supports the Council's position that smaller 'non-strategic' allocations can help to ensure a deliverable housing supply in the short-term. Of these, the Former Stanton Harcourt Airfield has been identified as a proposed allocation for the provision of 50 dwellings with the Council's site assessment concluding that it is a suitable and deliverable development opportunity. The Estate supports the allocation of land within Stanton Harcourt which is identified as a Village and therefore, is deemed as a sustainable settlement for growth within the District.

The Estate agree that there are no major physical or policy constraints to prevent development coming forward. The Estate confirms that the site is located adjoining the village and as such accords with emerging policies OS2 and H2 which set that where there is an identified housing need, housing is permitted on undeveloped land adjoining the built up area.

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**MM786** Oxfordshire County Council

Amada Jacobs (OCC) Mrs Jacobs

Ecology and Natural Environment

In all cases reference should be made to the District Council's ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2271</td>
<td>Eynsham Woodstock Sub Area &gt; MAIN 178</td>
<td>and visual impact assessment will be undertaken including surveys for protected and threatened species. The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary. Stanton Harcourt Former Airfield The development of the site should be considered in the context of the recently revised restoration proposal for Dix Pit landfill site. In particular there are potentially significant recreational links. There is the potential for bat roosts in existing buildings. Existing structural vegetation should be identified and protected. Records indicate some of the land may be of best and most valuable category though this is likely to be been modified by subsequent uses. The site lies within the Lower Windrush Valley Project area and consideration should be given to how best to support the long-term strategic aims of the LWVP.</td>
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<tr>
<td>MM380</td>
<td>Berks, Bucks and Oxon Wildlife Trust</td>
<td>BBOWT - Haidrun Breith</td>
<td>Mrs Breith</td>
<td>793</td>
<td>Eynsham Woodstock Sub Area &gt; MAIN 178</td>
<td>Policy EW1h (following 9.5.42h) b) provision of satisfactory vehicular access and appropriate pedestrian and cycle connections. Stanton Harcourt According to our data proposed housing site at Stanton Harcourt encroaches into the Stanton Harcourt Site of Special Scientific Interest (SSSI). SSSIs are protected by law and the Local Planning Authority has a duty under the Natural Environment and Rural Communities Act (NERC) to take account of biodiversity in all their actions. As such a SSSI should not be encroached or adversely affected by a development allocation. This requires the provision of appropriate buffers between any development and the SSSI. The presence and sensitivity of the SSSI is not recognised in the proposed policy and we consider it important that the policy is revised to reflect the ecological sensitivity.</td>
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<tr>
<td>MM424</td>
<td>Natural England</td>
<td>Marc Turner</td>
<td>Mr Turner</td>
<td>951</td>
<td>Eynsham Woodstock Sub Area &gt; MAIN 178</td>
<td>Stanton Harcourt Airfield; this allocation includes Stanton Harcourt SSSI, which is designated for its geological interest. The SSSI should be buffered from built development and incorporated into Green Infrastructure with opportunities for learning provided in relation to the geological interest.</td>
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<tr>
<td>MM163</td>
<td>Eleanor Chance</td>
<td>Chance</td>
<td>-</td>
<td>356</td>
<td>Eynsham Woodstock Sub Area &gt; MAIN 178</td>
<td>9.5.45 Rail connectivity is NOT good. It is via a winding country road, under a very narrow railway bridge to Hanborough.</td>
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<tr>
<td>MM64</td>
<td>Transition Eynsham Area</td>
<td>Rosalind Kent</td>
<td>Mrs Kent</td>
<td>1185</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 179</td>
<td>9.5.45 WODC need to think bigger - low-energy tram or train service from Carterton/Witney going to Marston, Headington, and Cowley for example</td>
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<tr>
<td>MM455</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
<td>-</td>
<td>1214</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 180</td>
<td>MAIN 180 Paragraph 9.5.48</td>
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<td>We support paragraph 9.5.48 which confirms that Hanborough Station is a 'key priority' for the Council, with the Council anticipating it developing in to a highly effective transport hub, coupled with various improvements including improvements to parking capacity and station facilities. We also support the recognition that the Council will work with relevant partners to help to deliver this aspiration.</td>
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<tr>
<td>MM756</td>
<td>Cantay Estates</td>
<td>Cantay Estates</td>
<td>-</td>
<td>1955</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 180</td>
<td>MAIN149, 180: We welcome the acknowledgement in the modification of the potential for enhancement of Hanborough Station as a transport interchange, however the proposed downgrading of the settlement is clearly at odds with this and undermines the aspiration for improvements. Such an approach is also at odds with the NPPFs encouragement of environmentally sustainable development.</td>
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<td>The modification suggests increased car parking at the station, whilst this could encourage rail commuters from rural areas it is clearly preferable to remove the need for car use all together. Additional cycle parking should be provided and homes provided in locations which already benefit from access to the station by sustainable means.</td>
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<td>New homes created in Long Hanbrough would benefit from existing foot and cycle access to the station, therefore they could be delivered early in the plan period and support enhanced rail services without need for additional car journeys. To seek to restrict this undermines the aspiration of the plan. The Council suggest the proposed northern extension of Eynsham could benefit from sustainable access options through creation of new foot/cycle routes from the south.</td>
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<td>These would be more distant than any point within Long Hanbrough, furthermore their delivery cannot at this point be guaranteed. If the Council wishes to make the most of opportunities presented by rail routes from Hanborough permitting of additional development in the village is clearly the correct path.</td>
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<tr>
<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2272</td>
<td>AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 180</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 180</td>
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<td>In terms of the highway network, we will work in partnership with the County Council to take forward necessary improvements with the A40 being the top priority. The award of £35m through the Local Growth Fund offers the potential to make a significant improvement to the current situation which would have benefits for other areas if traffic using those could be encouraged to remain on the A40 instead of seeking</td>
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<tr>
<td>MM332</td>
<td>Ms Couch</td>
<td>Ms Couch</td>
<td>637</td>
<td>&gt; Eynsham Woodstock Sub Area &gt; MAIN 180</td>
<td>alternative quicker routes. We will work with the County Council and other relevant partners to deliver a new park and ride site of around 1,000 spaces is delivered to the north of Eynsham as part of the West Oxfordshire Garden Village proposal. This will be coupled with the provision of a new eastbound bus lane towards Oxford. We will also work with the County Council to help identify an appropriate strategy for delivering the longer-term improvements to the A40 that have been identified including additional dualling between Witney and Eynsham and a westbound bus lane between Eynsham park and ride and the edge of Oxford.</td>
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| MM374        | Carillion Capita       | Jeremy Flawn   | 749              | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 180 | 9.5.45
- disagree with statement: ‘rail connectivity is relatively good’- it is very poor. Hanborough is our only station and it is not where the development is proposed. Services are already overloaded and the new car park cannot cope with demand. No buses link Eynsham to Hanborough and the road is unsafe for cyclists. We need an integrated transport infrastructure to be (at least part) in place before we add more houses.
- A40 cycle route is not ‘good’- it is poorly maintained and hazardous, but at least there are N and S options to avoid cycling into oncoming headlights.
- A40 and Toll bridge (B4440) are appallingly congested and work is long overdue.
- The current A40 plans will not make a ‘significant improvement to the current situation’. Needs a more radical solution to travel around Oxford, to sustain current use and enable future growth (if desirable), looking at the whole network, including the overloaded B4044 in the medium to long term.
- Buses are being cut. A solution may be better bus or community/shared transport links from the smaller villages. 9.5.46 The community needs to be involved in developing plans. Increasing road capacity is not the answer- we need to get people off the road! 1000 car spaces at Eynsham (but only 500 in the first phase) and a bus lane in one direction part of the way will not get enough people out of their cars- many are travelling from Witney and beyond. 13,000 cars a day go into Oxford along the A40. DfT data records over 26,000 vehicles AADF (Annual average daily flow) at A40/B4449 (Eynsham) and nearly 25,000 at A40/A415 (Witney) (Count points https://www.dft.gov.uk/traffic-counts/cp.php?la=Oxfordshire.) ie there is very little reduction in traffic at Witney, suggesting a Park and Ride at Eynsham is unlikely to attract many drivers. Better to plan and fundraise for an off road solution (rail/light rail) which avoids the bridge bottlenecks from Witney into Oxford, linked to other transport hubs.

9.5.48: I support improvements to Hanborough train stop and better bus and cycle access in the short term, but we really need a new link from Witney/Eynsham to Oxford as above.

9.5.49- active travel- this needs a co-ordinated approach: ‘Existing pedestrian and cycle routes will be safeguarded and opportunities for new and enhanced routes will be identified….The Council will work with the [Bikesafe] group and other relevant partners including the County Council to further consider the merits and possibility of this scheme being taken forward.’ I would like stronger statements here- the merits of the B4044 scheme have already been demonstrated, what we need is action. As one cycle route on the A40 will go under current A40 plans, suggest the Local Plan supports the replacement of one route with the B4044 route which would be more heavily used by the increasing numbers in the Eynsham area. |

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<td>MM3</td>
<td>richard andrews</td>
<td>Mr</td>
<td>Andrews</td>
<td>82</td>
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<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 180</td>
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<td>Comments made on behalf of Eynsham Parish Council.</td>
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<td>9.5.48 Comment: Unsound – no consideration of alternatives.</td>
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<td>The proposal makes Hanborough Station into the local ‘transport hub’, while ignoring the potentially much larger benefits of using the Eynsham Park and Ride as a transport interchange between bus and car and between buses. This does not reduce the value of Hanborough Station as an access point for rail transport, which should also be encouraged.</td>
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<td>We question whether reference to OCC aspirations to ‘improve bus services’ adds credibility to the plan given their recent cutting of bus services.</td>
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<td>MM446</td>
<td>OxlEP Limited</td>
<td>Ms</td>
<td>Beal</td>
<td>1036</td>
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<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 182</td>
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<td>Support new text to strengthen the policy and ensure consistency with the NPPF.</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Mr</td>
<td>Small</td>
<td>1094</td>
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<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 182</td>
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<td>Historic England welcomes and supports the addition to Policy EW1 as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
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<td>MM455</td>
<td>Commercial Estates Group</td>
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<td>Commercial Estates Group</td>
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<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 182</td>
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<td>Main 182 Policy EW1</td>
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<td>While we don’t object we have the following comments: as the proposed modification should be more explicit in referencing the Outstanding Universal Value of the World Heritage Site as set out in the WHS Management Plan. The drafting should be clarified, and the following amendments are suggested:</td>
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<td>‘In accordance with the National Planning Policy Framework, great weight will be given to the conservation of the Outstanding Universal Value of the World Heritage Site and any harm or loss to that significance will require clear and convincing justification.’</td>
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<tr>
<td>MM626</td>
<td>Charlbury Conservation Area Advisory Committee</td>
<td>Mrs</td>
<td>West</td>
<td>1427</td>
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<td>LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt;</td>
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<td>Para 7 of Policy EH7 says that ‘considerable weight’ will be given to conserving the universal values for which Blenheim Palace and Park is inscribed as a World Heritage Site. This is inconsistent with Policy EW1 Blenheim World Heritage Site which says that ‘great weight’ will be given to the conservation of the WHS and to the conservation and enhancement of the Outstanding Universal Value etc when assessing the impact of a proposed development on the OUV.</td>
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|               |                         |                |                 |                   | ‘Great weight’ is the wording used in para 132 of the NPPF which says that ‘the more important the asset, the
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<td>MM721</td>
<td>The Blenheim Palace Estate</td>
<td>Neilson</td>
<td>-</td>
<td>1631</td>
<td>MAIN 182</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 182</td>
<td>greater the weight should be. Para 132 includes World Heritage Sites among the designated assets 'of the highest significance' when assessing harm or loss.</td>
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<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small</td>
<td>Dr</td>
<td>Small</td>
<td>1025</td>
<td>MAIN 183 POLICY EW2 Eynsham-Woodstock Sub-area Strategy</td>
<td>Whilst Policy EW1 is supported, the proposed addition to the background text in the Local Plan at 9.5.62 appears misleading and incorrect. The addition of the phrase &quot;in accordance with relevant policies of the development plan&quot; (the inclusion of which is, in any case, unnecessary due to the need for proposals to be considered against the relevant policies of the development plan), results in Para 9.5.62 appearing to assert that the WHS Management Plan is only a material consideration when a planning application is in accordance with relevant policies of the Local Plan. This makes no sense. The World Heritage Site Management Plan is a material consideration and as such, it comprises a material consideration regardless of whether a planning application is in accordance with the relevant policies of the Local Plan. The simple solution is to delete the unnecessary addition &quot;in accordance with relevant policies of the development plan&quot;.</td>
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<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1095</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 183</td>
<td>Historic England welcomes and supports the amendment to Policy EW2 of &quot;conservation and enhancement&quot; of historic assets as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.</td>
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<tr>
<td>MM479</td>
<td>Dr KWGray</td>
<td>Dr</td>
<td>Gray</td>
<td>1203</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 183</td>
<td>To the end of paragraph 9.6.11should be added: o &quot;Heavy traffic through Burford High Street Traffic causes air pollution levels marginally below the EU limit which has detrimental health effects and erodes Burford’s medieval buildings. With the reduction of HGVs due to the introduction of a West Oxfordshire Weight Limit Zone the air pollution in Burford which is just below the legal limit should be heavily reduced.&quot;</td>
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<td>MM455</td>
<td>Commercial Estates Group</td>
<td>Commercial Estates Group</td>
<td>-</td>
<td>1218</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 183</td>
<td>MAIN 183 Policy EW2 - Eynsham – Woodstock Sub Area Strategy</td>
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<td>We fundamentally object to the proposed amendments to Policy EW2 which seek to remove reference to Long Hanborough as one of the foci for development in the Eynsham – Woodstock Sub Area. Whilst not objecting in principle to the proposed Garden Village at Eynsham, or the extension to the west of the same village, we object also to the Council’s process in identifying them as the most appropriate locations to accommodate both the increased housing needs of the District and the unmet needs of Oxford city - a process which did not give any consideration to the reasonable alternative provided on land adjacent to Hanborough Station.</td>
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</table>
### Long Hanborough – A Focus for Development

For the reasons set out in detail in our representations to Policy OS2, Long Hanborough should demonstrably retain its status as a 'Rural Service Centre' and, as a consequence, as one of the foci for development in the Eynsham – Woodstock Sub Area as identified by Policy EW2. Failure to retain such reference is not only contrary to all of the available evidence, but fundamentally and misleadingly results in the opportunity for development in one of the most sustainable locations for development in the District being wholly overlooked – an approach which is neither justified nor sound.

### Strategic Options for Growth – Flawed Process / Sustainability Appraisal

In response to the need to allocate materially higher levels of housing provision in the District, Policy EW2 proposes to include a series of additional strategic and non-strategic allocations. We focus initially on the approach to the strategic options for growth.

Following the Inspector’s Preliminary Conclusions issued in December 2015, which found that the Council’s initially proposed housing requirement of 10,500 homes was not justified and that this Plan should address the issue of unmet needs from Oxford City, the Council has ultimately concluded that its District requirement should accord with the Oxfordshire SHMA i.e. 13,200 dwellings. As part of the Oxfordshire Growth Board process, it was additionally agreed that West Oxfordshire’s apportionment of the unmet needs from Oxford City should be 2,750 dwellings i.e. a total of 15,950 dwellings in the District in the Plan period.

The Council’s Sustainability Appraisal Addendum Report (October 2016) confirms at paragraph 1.10 that this uplift in housing required re-consideration by the SA of the strategic options, and appraisal of new potential options for site allocations.

Paragraphs 3.8 to 3.12 of the SA Addendum summarise the process adopted by the Council in reviewing the strategic options for growth across the District. It can be seen that this only references options at Witney, Carterton, Chipping Norton and Eynsham. The identification of options at the three main towns of Witney, Carterton and Chipping Norton is a sensible and reasonable starting point.

However, given that there are six identified ‘Rural Service Centres’ in the District, of which Eynsham is just one, it is wholly unclear why the SA Addendum focusses solely on Eynsham and ignores opportunities elsewhere at any other Rural Service Centre.

Paragraph 3.11 confirms that following the decision to increase housing numbers, the Council investigated again the potential within the Eynsham – Woodstock Sub Area. This area of course includes not only Eynsham but also the Rural Service Centres of Long Hanborough and Woodstock.

However, with reference to the work of the Oxfordshire Growth Board (OGB), the SA Addendum focusses immediately and solely on Eynsham. It subsequently concludes that due to Eynsham’s proximity to Oxford, and its relatively good level of public transport accessibility, that two strategic options were identified and tested further through the SA process:

- a new Garden Village to the north of Eynsham; and
- an urban extension to the west of Eynsham.

No consideration is given at all to strategic growth options anywhere else in the Eynsham – Woodstock...
As a consequence, opportunities at the Rural Service Centre of Long Hanborough and specifically land adjacent to Hanborough Station, a location close to Oxford, adjacent to a mainline railway station and located outside of the Green Belt and AONB, was for some reason ignored.

Reference to the work of the OGB, which the SA Addendum gives as the reason why its search focussed only on Eynsham, confirms (fatally to the legitimacy, soundness and legal compliance of the process) why Long Harborough was ignored. The Oxford Spatial Growth Assessment Final Report (September 2016) (extract at Appendix 1) confirms at paragraph 3.2 that prior to the study taking place, each Oxfordshire authority was asked to identify a list of options in its District for assessment. Table 3.1 of this document confirms that West Oxfordshire District Council advanced only six potential options, all of which were either at Witney or at Eynsham.

Accordingly, as a direct consequence of the Council’s initial (wholly unexplained and unreasonable) failure to identify land adjacent to Hanborough Station as a reasonable alternative option for consideration, the OGB work did not assess the merits of this location in absolute or relative terms, and the SA Addendum similarly makes no such assessment. These fundamental flaws have resulted directly in what is clearly a reasonable alternative to the selected strategic options, land adjacent to Hanborough Station, being wholly ignored.

Non-Strategic Options for Growth

In addition to the proposed allocation of strategic sites at Eynsham, Policy EW2 now additionally proposes a series of non-strategic allocations, ranging from 300 homes to 25 homes in size. We do not take issue, as a matter of principle, with the making of such non-strategic allocations which could of course deliver housing more quickly than a strategic site of the scale and complexity of the proposed Garden Village (although we do object to the Council’s approach to housing in Policies H1 and H2 insofar as it unnecessarily and unreasonably seeks to delay housing provision and should instead make further non-strategic allocations to deliver housing in the short / medium term). However, in so doing, the Council has similarly failed to consider the potential for a non-strategic scale allocation on land adjacent to Hanborough Station, an option which is clearly a reasonable alternative to the selected options (and which in our view is, based upon the available evidence, demonstrably more sustainable and appropriate than some of the options now advanced by the Council).

The Council’s SHELAA (December 2016) identifies two sites adjacent to Hanborough station (Site Refs: 449 and 33), both of which are identified by the Council as available and achievable (Appendix 2). However, on the basis that the SHELAA ultimately concludes that these sites are unsuitable (a flawed and unsubstantiated conclusion to which we return below) they are discounted. As a consequence, it seems that the SA Addendum does not consider the merits of these sites at all.

This (flawed) approach has, amongst other things, resulted in the proposed allocation of sites within the AONB in the Burford-Charlbury Sub Area, sites very close to and with an impact on the Blenheim Palace WHS, and a site at Long Hanborough itself which is more environmentally constrained than those adjacent to Hanborough Station. The fact that such constrained sites are now proposed as allocations, when less constrained and more sustainable sites such as those adjacent to Hanborough Station are discounted in the SHELAA and not considered at all in the SA Addendum, demonstrates a clear failure in the Council’s processes.

Returning to the conclusions of the SHELAA relevant to the sites adjacent to Hanborough Station (Site Refs:
449 and 33) it can be noted that the SHELAA concludes that both sites:

i. are available;
ii. are achievable;
iii. are just 350m from Hanborough Station and employment opportunities at Hanborough Business Park;
iv. are served by existing bus services running along the A4095;
v. are within a reasonable walking and cycling distance of the existing services and facilities in Long Hanborough;
vi. are not in the AONB or Green Belt;
vii. are in Flood zone 1 i.e. suitable for housing;
viii. have ground conditions which appear to be good;
ix. are not in a conservation area and do not include any listed buildings or scheduled monuments;
x. are not subject to any biodiversity designations.

Having identified this lengthy list of positives, for wholly unexplained reasons the SHELAA then includes a section identifying what the relevant Parish Council’s view is on the merits of the identified sites. The rationale for including the views of non-technical political groups, in what is supposed to be a technical evidence base document used to identify a pool of possible housing sites, is not referenced and is in any event wholly inappropriate. This is confirmed by the fact that despite the long list of positives associated with these sites adjacent to Hanborough Station, the SHELAA identifies that Long Hanborough Parish Council objects to the sites and then concludes that the sites are not suitable for development, raising spurious points about purported landscape harm and the relationship of the sites to the village (albeit that there is existing development both to the east and west of the sites and that the Council now proposes the allocation of more constrained sites in the District and at Long Hanborough specifically).

Against this background it is evident that the conclusions of the SHELAA are not technically robust and that it does not provide a sound evidence base on which to make decisions.

The flaws in the SHELAA are further magnified as they have translated directly into fundamental flaw in the SA Addendum which has not considered the merits of the sites adjacent to Hanborough Station at all. The fact that non-strategic sites in the AONB, in very close proximity to a WHS and in more environmentally sensitive locations at Long Hanborough are proposed to be allocated, whilst unconstrained sites such as those adjacent to Hanborough Station are wholly ignored, confirms the fundamental flaws in the process.

Conclusion

In seeking to allocate land for the additional housing required as a result of the increase in the housing provision figure for the District, to include both a SHMA-compliant level of housing and the appropriate proportion of the unmet needs from Oxford City, the Council’s planning and SA process is fundamentally flawed, unsound and not legally compliant.

The consideration of possible strategic options fails completely to consider the merits of land adjacent to Hanborough Station, despite its clear merits, the Council’s recognition of its availability and merits in the SHELAA, and the fact that it is demonstrably a reasonable (and we say demonstrably better) alternative to those ultimately selected.

Similarly, the consideration of non-strategic options has failed to consider the merits of land adjacent to Hanborough Station, and has resulted not only in the omission of these sites but in the proposed allocation of more highly constrained and less appropriate sites in the District generally and at Long Hanborough specifically.
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MAIN 201
Appendix 2 (Housing Trajectory)

CEG wish to retain the right to address the Council’s true housing land supply position in detail at the Examination in Public sessions. Amongst other things, CEG’s position in relation to the extent of the shortfall is reserved in relation to the derivation of the five-year requirement and whether there has been a record of persistent under delivery sufficient to justify the application of a 20% buffer; the deliverability of the identified components of supply, including the new Local Plan allocations. At this stage, we comment upon a couple of specific supply components:

North Curbridge (West Witney)

In the trajectory, the Council rely upon this site to deliver 350 units in the 5-year period, 2016 to 2021. Suitability: The site is potentially suitable for development by virtue of its allocated status in the existing Local Plan and the existing resolution to grant planning permission.

However, given the length of time that has passed since the resolution to grant planning permission in May 2013, there is a likely need for revised survey work to be carried out, not least in respect of ecological interests prior to any permission being issued. No such ecological update report is contained on the Council’s website. The need for such survey work could result in a potential delay of up to 1 year, given the need to survey over a sufficient seasonal period.

Availability: In the absence of an outline planning permission and the failure of the landowners to complete a legal agreement in the 3 and a half years since a resolution to grant planning permission was passed, the site cannot be described as available today.

Achievability: As highlighted in the committee report there is a need for the developer to provide a new junction to the A40 prior to the construction of the 200th house. These works often involve long lead in times and could constrain delivery in the early stages.

In addition, the 2013 committee report states that there is a viability gap (paragraph 5.61) to developing the site. This again casts doubt as to the achievability of development on the site and is likely to explain the 3 and a half year delay in the signing of a legal agreement.

Appendix 1 (Schedule of Future Infrastructure Requirements) (page 55) of the submission West Oxfordshire Infrastructure Delivery Plan July 2015 update refers to the ‘Downs Road/A40 junction improvements, Witney’ highway improvement project:

The IDP confirms that the ‘Downs Road/A40 junction improvements, Witney’ project was costed at a total £6.1m in 2012 and £1.25m has already been secured in S106 contributions. The ‘Anticipated Funding Mechanism’ and ‘Comments’ columns clearly state that the residual funding for this project is to come from the West Witney SDA and the project forms a prerequisite to West Witney coming forward.

The project is assessed as ‘critical’, which would suggest if the funding is not secured West Witney...
**6.0 SUMMARY AND CONCLUSIONS**

6.1 Allocating Land to the North West, Stanton Harcourt for housing would facilitate the provision of a much needed bypass around Sutton.

6.2 The site sits next to existing higher density development and is contained by the B4449. Any development would integrate naturally with existing higher density development.

6.3 The site is within the conservation area, as is the whole of Stanton Harcourt and much of Sutton. Any development on the site would use appropriate design and materials for the location. It does not however, contain any heritage assets. Or locally important buildings.

6.4 The site is in Flood Zone 1 and is not constrained by an environmental designation.

6.5 The site is available immediately for development.
LOCAL LEVEL
> Eynsham
Woodstock
Sub Area >
MAIN 183

16/03627/OUT) for development for up to 60 dwellings, a shop and a pre-school
nursery with associated infrastructure works. As a result, a number of studies have
been carried out on the site. Below is a summary of the findings.

Built Form

5.2 The site is surrounded by existing development and sits naturally next to the highest
density area of housing in the settlement (on the western edge of the site). Thus, the
development could successfully integrate with the existing built form.

Landscape Impact

5.3 A Landscape Visual Impact Assessment has been carried out to assess the impact of
the proposed development on the landscape. It concludes that a considered and
sensitive development approach including the retention and enhancement of existing
vegetation combined with new planting and ecological areas would ensure that the
development could be accommodated without detriment to the existing landscape
character, visual environment and wider landscape context. The findings relate to the
following factors:

• The site benefits from existing visual and physical containment and boundary
separation from the wider landscape context and thus the influence of the site
is highly localised. The presence of built form along the eastern edge of the
site will screen the proposed development from Eynsham within the exception
of those at close range along the boundary;

• Views from the wider landscape are already heavily restricted by the wider village setting and existing vegetation structure; and

• The implementation of the landscape buffer on the western site boundary
offers a significant opportunity to provide landscape and ecological
enhancements.

Ecology

5.4 An Extended Phase 1 Habitat Survey has been undertaken. The proposed
development complies fully with adopted Local Plan Policy NE13 and draft Local Plan Policy EH2, which seek to safeguard, maintain and enhance priority habitats
and species within the district. The development would include areas of open space
and landscape buffers such that habitats within the site could be maintained in situ.

Heritage

5.5 A Heritage Impact Assessment has been undertaken to assess the impact of the
proposed development in heritage terms, in relation to the history of the site and its
surroundings and any potential impact upon the character and appearance of the
Stanton Harcourt and Sutton Conservation Area. The report identified that ‘the
intrinsic significance of the site in built heritage terms is negligible’ and that the
contribution the site makes to the character and appearance of the Conservation
Area from the public realm is limited to the northern portion of the site (which would remain open). The report concludes that the current proposals are ‘compatible with ‘preserving’ what is significant about the character and appearance of the Stanton Harcourt and Sutton Conservation Area and the settings of nearby heritage assets and that there is no conflict with the statutory tests set by Sections 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

Highways

5.6 A Transport Assessment was prepared to assess the impact of the proposed development on the local highway network.

5. 7 It concludes, that in terms of location, the site is very sustainable being within walking and cycling distance of a range of local services and facilities including employment. There is also a regular bus service from the village to Eynsham and Oxford. In conclusion, the assessment demonstrates that the level of traffic generated would not have a significant impact upon the wider highway network.

Flood Risk & Drainage

5.8 The site is situated within Flood Zone 1, however due to the size of the site, a Flood Risk Assessment (FRA) was undertaken. It provided a number measures that can be implemented to ensure that the site would be at low risk from all potential sources of flooding and suitable for development in terms of flood risk.

6.0 CONCLUSION

6.1 In light of the foregoing, our client considers Butts Piece to be a more suitable allocation than the Former Airfield, Stanton Harcourt.

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<td>Policy EW2 Eynsham - Woodstock Sub-Area Strategy Policy EW2 (MM183) should be amended to refer to the delivery of 4,464 homes in the plan period (1,720 plus 1,440 at the Eynsham Garden Village and other commitments) and to reflect the deletion of Land North of Banbury Road, Woodstock. The Eynsham - Woodstock sub area anticipated delivery in Table 9.4 only amounted to 5,474 (or 2,724 excluding Oxford City unmet need), and not 2,800 as suggested by Policy H1 (76 less). Notwithstanding this, with the omission of 250 homes at Woodstock the sub area should be reduced to 1,720 homes.</td>
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| MM367 | Ascott Parish Council | - Carter | 692 | LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 183 | ASCOTT-UNDER-WYCHWOOD PARISH COUNCIL
RESPONSE TO WODC DRAFT LOCAL PLAN 2031 CONSULTATION

Ascott-under-Wychwood Parish Council notes that our village has actually been named for the first time in the Draft Local Plan 2031 and has been moved to the ‘Villages’ category. We are very concerned that this has been done apparently arbitrarily and without any consultation at all with the Parish Council.

The consequence is that certain statements which were acceptable last year (when only 2 Wychwood villages were named) are no longer accurate with Ascott-u-W included. Ascott is a village one half and one third of the size of the other two Wychwood villages and with far fewer amenities. It is not accurate to include Ascott in the general Wychwood statements written last year. This places us in the difficult position of strongly objecting to statements which are not among the amendments but our objections do flow from the original critical amendment – that of naming Ascott-under-Wychwood in the Villages category.

In particular, we feel that the impression is given over and over again that Ascott-u-W is reasonably well served by public transport. This is blatantly not the case and the situation has got worse in the past 6 months with the cuts in bus subsidies (as indicated in our response to the WODC Planning Services Parish Survey 2016). Ascott-u-W also appears to have a Post Office (Friday afternoon in Tiddy Hall does not constitute a Post Office) – and a smart railway station with a reasonable service (when in fact it has 1 train each way on weekdays only, too late in the morning for London commuters and even Oxford schools).

We are extremely concerned that an inspector, if considering a planning application appeal, might refer to the WODC Local Plan 2031 and think that Ascott-under-Wychwood has amenities equal to Shipton and Milton and we would ask that the Draft Local Plan be amended to reflect the true picture. |
| MM374 | Carillion Capita | Jeremy Flawn | Mr Flawn | 750 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > MAIN 183 | OCC Property & Facilities supports the amendments to policy EW2 which seek to focus new development at Eynsham, Woodstock and the West Oxfordshire Garden Village. In particular OCC P&F supports the references to the proposed Eynsham SDAs within the policy:

* a Strategic Development Area (SDA) of around 2,200 homes to the north of the A40 near Eynsham to be delivered in the form of a new Garden Village

* a Strategic Development Area (SDA) of around 1,000 homes to the west of Eynsham

OCC P&F is keen to work with the District Council, Parish Council and other key stakeholders to help deliver these important developments. |
| MM380 | Berks, Bucks and Oxon Wildlife Trust | BBOWT - Haidrun Breith | Mrs Breith | 789 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Eynsham Woodstock Sub Area > | Sub-Area-Strategy wording

We found that that proposed sub-area policies (eg policies WIT4 or EW2) give insufficient weight to the protection and enhancement of the natural environment and the importance of Green Infrastructure and Masterplanning.

We propose that additional bullet points are added to the policies, eg: |
Proposals for development in the sub-area should be consistent with the strategy which includes:
- maximising opportunities for enhancements within the Conservation Target Areas (CTAs)
- masterplanning of strategic development sites that takes adequate account of open space and green infrastructure networks and needs, and maximises opportunities to create and strengthen green infrastructure in accordance with the Council’s Green Infrastructure Plan (to be prepared)

Eynsham

We note that a significant westward and northward expansion of Eynsham is proposed which will result in the town to grow 2-3 times its size. We note that the northern expansion is proposed to be a separate settlement in Garden Village style but we wonder whether the creation of a separate settlement next to another is feasible or even desirable. We are concerned about the quantum of development and its impacts on resources and the natural environment. Again we could not find any evidence that ecological survey were carried out to inform this allocation and we consider it essential that ecological surveys are carried out to inform decisions on this allocation.

We welcome that the allocation is indicative only and that the area avoids designated sites or priority habitats. Having said this, the allocation comes up to the South Freeland Meadows Local Wildlife Site (LWS) and we are concerned about the impact the development will have on the nature conservation interest of this site. Meadows of similar quality have also been identified to the East and North of this LWS and these are currently considered as potential extensions to the LWS. As such a large area immediately adjacent to the northern boundary of the proposed development is sensitive in ecological terms.

In addition, it has been brought to our attention that parts of the proposed new garden village area have recently been recognised by Plantlife for its notable arable weed assemble, which might act as a constraint to development. We strongly recommend that ecological surveys are carried out at the earliest opportunity to inform the masterplan process.

If this allocation was further pursued we expect a minimum buffer of 50 m to the existing and proposed LWS to be provided.

We welcome that the new settlement is proposed to follow the garden village principles, however, these have not been defined. We believe that the proposed expansion of Eynsham and the proposed garden village should be subject to an overall masterplan and accompanied by a green infrastructure strategy that considers Eynsham’s open space and green infrastructure needs in their entirety. This way a comprehensive network of green links and open spaces could be created that maximises benefits for people and wildlife.

We expect that the proposed new garden village and the western expansion of Eynsham will generate significant amounts of traffic adding to an already existing high traffic volume. Transport improvements such as the widening of the A40 or the creation of the west Eynsham link road will need to be assessed not only in transport terms but also ecological terms.

Woodstock

In Woodstock three sites are being put forward for development. We welcome that they avoid any designated sites, however, pressure (particularly recreational pressure) on nearby designated sites such as
Blenheim Park 5551 and Woodstock Water Meadows LWS is expected to increase. Care will need to be taken in the layout and design of these sites to ensure that they include sufficient open space for people to use to alleviate pressures on designated sites.

The development areas are located adjacent to the Blenheim & Bletchley Park CTA and development we would expect development to contribute to the aims and objectives of the CTA.

I am writing on behalf of the Eynsham Society, a village amenity group of some 150 active residents, to object to the revised Draft Local Plan insofar as it affects the village of Eynsham.

The draft Plan has a disproportionate and potentially devastating effect on Eynsham, which had already doubled in size between 1970 and 2001 (Eynsham Village Design Statement: http://eynshamsociety.org.uk/VDS.pdf) and has been expanded further since then. The draft Plan provides for an additional 3,200 dwellings (including the supposed “Garden Village”, in practice a thinly-disguised extension of Eynsham), which would more than double its size again, permanently affect its setting in the landscape and almost certainly destroy its cohesion as a community by changing it from a vibrant village to an under-resourced town without a commercial centre. As the VDS says, “In the 20th century, the main influence on the village has been its nearness to Oxford, and its position on the edge of the Oxford Green Belt. Oxford needs more housing, and this puts pressure on communities just outside the Green Belt to accept development. One outcome has been that the population of the village has doubled since 1960. Nevertheless, Eynsham has not developed the kind of centre which characterises Woodstock and Chipping Norton, and it remains a village.” It is notable (and unacceptable) that of these 3,200 houses only 450 (14%) would be to meet local housing need. Even if one took at face value the assertion that the “Garden Village” would be a separate, self-sustaining village, the 1,000 additional houses proposed on the west of Eynsham could increase its population by up to 50%, and the link road from these to the A40 could cut off the existing and much-valued pedestrian access to open countryside.

Eynsham accepts that it needs a proportionate amount of new housing, and volunteers in the Eynsham Futures Group have devoted much time and effort over the last two years to preparing a draft Neighbourhood Plan detailing how this could best be delivered. Options identified include a small development either to the west of the village (caution is needed here to prevent sprawl as there is no strong boundary) or north of the A40 in a small part of the area where the “Garden Village” is now proposed. By preempting the only suitable sites, the draft Plan renders this work nugatory and destroys any pretence of “localism”. This echoes the fate of the VDS, adoption of which was delayed by WODC planning officers until the scheme was abolished, so that it never came into force. It also eliminates the future option of dualling the A40 on a new line to the north of the small extension (as envisaged in the selected Blue Route of the 1990s dualling proposal) to avoid the intolerable nuisance that dualling on-line would cause to north Eynsham.

The supposed “Garden Village” – to be inauspiciously named “Tilgarsley” after the village somewhere in the area which was wiped out by the Black Death - is presented as though it were a self-contained and bounded independent settlement, as required by the prospectus for Garden Villages at https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities. However, it is from the outset intended to accommodate Oxford unmet need rather than local people, and would rely on oversubscribed secondary school places and medical facilities in Eynsham, so would certainly not be self-contained. It would be at best an Oxford dormitory and at worst a ghetto.

Much is made of the close proximity of the “Garden Village” to Hanborough Station, which in principle might reduce dependency of its residents on the overloaded A40 to travel to work in Oxford. However, the major employment sites in Oxford are at the opposite side of the city from the station, in Headington and Cowley,
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<td>so in practice this is unlikely to be the case. A more likely outcome is that houses on the open market would be taken up by highly-paid London commuters who would drive prices out of the reach of local people. The cynical attempt to present this over-extension of Eynsham as a &quot;Garden Village&quot; is clearly behind the decision to site all the Oxford unmet need housing in one place, for which there is otherwise no requirement. The housing does need to be within reasonable reach of Oxford, but dispersing it among several sites would considerably reduce its negative impact on any one settlement. It is worth noting that a sustainable solution to Oxford's permanent shortage of building land would be to move both the inner and outer boundaries of the Green Belt out by a modest distance (half a mile, say) which would remove the stranglehold on Oxford and actually increase the Green Belt area.</td>
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<td>Comments made on behalf of Eynsham Parish Council Policy EW2 should be amended to bring into line with comments made on EW1 a and b, particularly for the need for one SDA and/or one AAP so that the proposed developments at Eynsham including the Park &amp; Ride, A40 improvements, Garden Village and possible western extension can all be considered as a whole and not piecemeal. It is most important that the long-term strategy for such a wide-ranging and closely located development be defined at an early stage and then co-ordination between these projects be maintained during implementation.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Eynsham Woodstock Sub Area &gt; MAIN 183</td>
<td>I wish to object to the inclusion of polices EW1c, EW1d, EW1e in the Local Plan. These policies involve the building of 670 homes on land to the north of Hill Rise, to the north of Banbury Road, and to the south east of Woodstock. As Parish Path Warden for Woodstock I am familiar with all the public footpaths around the town. I know how well-used they are and how much they are valued by the townspeople. If these developments go ahead, footpaths FP1, FP7 and FP8 would become nothing more than urban snickets of no amenity value whatsoever. Land close to the town should be left as open country for the benefit of all for exercise and recreation.</td>
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There are limited opportunities for larger sites, as noted in 9.6.26 & 27, due to the landscape character of Burford and Charlbury and the AONB. It is of note that Burford Town Council expressed a desire for affordable housing (through the Burford Road application), which the Land East of Burford site offers and it’s bounded by buildings on 3 sides so could be considered as infill. Nevertheless, it’s in the AONB. The landscape impact of the site from key historical locations in the town should be reviewed. Also, should a review of applications highlight an increased potential for windfall, this site may prove unnecessary. Furthermore, the Burford Road site is awaiting an appeal decision. CPRE opposed this site, but if the appeal is allowed, the supply in the sub-area would be significantly boosted. Therefore, once again the need for further allocations/sites could be reviewed thereafter.

We are aware that paragraphs 115 and 116 of the NPPF attach great weight to conserving landscape and scenic beauty in Areas of Outstanding National Beauty, where major development should be refused except in exceptional circumstances. Given the constraints imposed by the AONB, we question whether any housing allocations in the AONB settlements is possible at this late stage of the plan. We suggest that the approach to plan-led development in West Oxfordshire’s AONB settlements such as Charlbury needs to be careful and considered, perhaps following the approach taken by local planning authorities such as Winchester, Horsham and North Kesteven where a plan-wide allocation for certain, smaller scale settlements is set, with development coming forward either (a) as part of a Neighbourhood Plan or other locally supported initiatives, such as a Planning Brief, or (b) by means of a planning application that is supported at the local/Parish level. This approach has been tested at EIP/hearings recently, and held to be sound.

Scope for Further Expansion
As paragraph 9.6.18 of the draft Local Plan states, the area is particularly environmentally sensitive, being covered by the Cotswolds Area of Outstanding Natural Beauty (AONB). The area is also recognised in the draft Local Plan as being significant in terms of the historic environment. Most of Burford is in the Burford Conservation Area and is home to a number of listed buildings (paragraph 9.6.21). The area is highly constrained in terms of environmental and statutory historic designations and although it is clear that Burford is an appropriate location for growth ‘it must be recognised that opportunities for development are relatively limited and the planned scale of growth therefore needs to be appropriate.’ (paragraph 9.6.25). Proposed Main Modification 184 deletes supporting text about the limited capacity for development at Burford which previously read:

‘The development potential of land surrounding Burford is heavily constrained by the sensitivity of the landscape although there is scope for a small scale extension of the built up area’.

The proposed new supporting text which identifies capacity to the east of the town for an extension of the built up area contradicts text in the same paragraph which states that ‘whilst there is some scope to provide additional dwellings within the built up area, the setting of listed buildings and conservation is a key sensitivity, limiting large scale intensification’ (paragraph 9.6.26). The proposed modification to the plan clearly relates the new potential to the site allocation at Land East of Burford however there has been no updated evidence which details why development to the east of the town has now become appropriate when it was previously considered to be a highly constrained by heritage and landscape impact. This allocation itself is discussed in the next section of these representations.

Burford remains a highly constrained settlement, where there is an identified need for growth but little
capacity to deliver it. The AONB and Conservation Area designations cover most of the settlement, meaning that the vast majority of sites assessed in the Strategic Housing and Economic Land Availability Assessment 2016 (SHELAA) are in either the Conservation Area or the AONB, and in some cases, they are in both.

The only site that is not constrained by either the AONB or the Conservation Area designations is Land at Shilton Road (Site 146). Though the designations themselves do not preclude the principle of development of a site, sites within Conservation and the AONB have a high level of sensitivity to development and must meet statutory tests in relation to the protection of heritage assets and designated areas of landscape. Sites such as Land at Shilton Road which are not constrained and can deliver the homes needed should have been considered as part of a more robust site selection process as set out in the next section.

The Charlbury Neighbourhood Forum is a community group set up by the Charlbury Town Council. It is currently preparing both Community Led and Neighbourhood Development Plans on the Council’s behalf. While I am a member of the Forum, this representation is made in a personal capacity as an interested local resident who was a Planning Inspector from 1991-2015.

This is an objection to the revised wording of paragraph 9.6.27, in particular the inclusion of the word ‘significant’. If a proposed development is considered insignificant it would have a nil impact and would therefore almost inevitably be acceptable. The inclusion of ‘significant’ is therefore redundant and it should simply be removed altogether.

If that is not accepted, then some further explanation is needed of what is meant. I would suggest the following: “significant’ in this context is not intended as a reference to an arbitrary number of dwellings or buildings but includes any development that might have an adverse impact on the landscape and environmental setting of the town, including heritage considerations.” But it would be simpler just to remove it!

R O Evans BA(Hons) Solicitor MRTPI (retired)

ASCOTT-UNDER-WYCHWOOD PARISH COUNCIL

RESPONSE TO WODC DRAFT LOCAL PLAN 2031 CONSULTATION

Ascott-under-Wychwood Parish Council notes that our village has actually been named for the first time in the Draft Local Plan 2031 and has been moved to the ‘Villages’ category. We are very concerned that this has been done apparently arbitrarily and without any consultation at all with the Parish Council.

The consequence is that certain statements which were acceptable last year (when only 2 Wychwood villages were named) are no longer accurate with Ascott-u-W included. Ascott is a village one half and one third of the size of the other two Wychwood villages and with far fewer amenities. It is not accurate to include Ascott in the general Wychwood statements written last year. This places us in the difficult position of strongly objecting to statements which are not among the amendments but our objections do flow from the original critical amendment – that of naming Ascott-under-Wychwood in the Villages category.

In particular, we feel that the impression is given over and over again that Ascott-u-W is reasonably well served by public transport. This is blatantly not the case and the situation has got worse in the past 6 months with the cuts in bus subsidies (as indicated in our response to the WODC Planning Services Parish Survey 2016). Ascott-u-W also appears to have a Post Office (Friday afternoon in Tiddy Hall does not constitute a Post Office) – and a smart railway station with a reasonable service (when in fact it has 1 train each way on weekdays only, too late in the morning for London commuters and even Oxford schools).

<p>| MM324 | R O Evans | Mr Evans | 600 | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 184 | Capacity to deliver it. The AONB and Conservation Area designations cover most of the settlement, meaning that the vast majority of sites assessed in the Strategic Housing and Economic Land Availability Assessment 2016 (SHELAA) are in either the Conservation Area or the AONB, and in some cases, they are in both. The only site that is not constrained by either the AONB or the Conservation Area designations is Land at Shilton Road (Site 146). Though the designations themselves do not preclude the principle of development of a site, sites within Conservation and the AONB have a high level of sensitivity to development and must meet statutory tests in relation to the protection of heritage assets and designated areas of landscape. Sites such as Land at Shilton Road which are not constrained and can deliver the homes needed should have been considered as part of a more robust site selection process as set out in the next section. The Charlbury Neighbourhood Forum is a community group set up by the Charlbury Town Council. It is currently preparing both Community Led and Neighbourhood Development Plans on the Council’s behalf. While I am a member of the Forum, this representation is made in a personal capacity as an interested local resident who was a Planning Inspector from 1991-2015. This is an objection to the revised wording of paragraph 9.6.27, in particular the inclusion of the word ‘significant’. If a proposed development is considered insignificant it would have a nil impact and would therefore almost inevitably be acceptable. The inclusion of ‘significant’ is therefore redundant and it should simply be removed altogether. If that is not accepted, then some further explanation is needed of what is meant. I would suggest the following: “significant’ in this context is not intended as a reference to an arbitrary number of dwellings or buildings but includes any development that might have an adverse impact on the landscape and environmental setting of the town, including heritage considerations.” But it would be simpler just to remove it! R O Evans BA(Hons) Solicitor MRTPI (retired) |
| MM367 | Ascott Parish Council | - Carter | 694 | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 184 | |</p>
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<tr>
<td>MM375</td>
<td>Charlbury Town Council</td>
<td>Charlbury Town</td>
<td>Mr</td>
<td>Clarke</td>
<td>736</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 184</td>
<td>We are extremely concerned that an inspector, if considering a planning application appeal, might refer to the WODC Local Plan 2031 and think that Ascott-under-Wychwood has amenities equal to Shipton and Milton and we would ask that the Draft Local Plan be amended to reflect the true picture.</td>
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<tr>
<td>MM379</td>
<td>Friends of Evenlode Valley and West Oxfordshire Cotswolds</td>
<td>Friends of Evenlode Valley and West Oxfordshire Cotswolds</td>
<td>Mr</td>
<td>Clemence</td>
<td>770</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 184</td>
<td>The dropping of the requirement for development at Burford to be small-scale is not justified. The small scale requirement is also needed to comply with NPPF116 and the strong presumption against major development in the AONB and the Cotswolds Conservation Board Management Plan and housing guidelines. Consistency with 9.6.26, NPPF116 and Cotswolds Conservation Board Management Plan and housing guidelines compliance requires that the insertion that some development may now be acceptable in Charlbury should also be caveated to be small scale rather than of ‘appropriate scale’.</td>
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<td>MM47</td>
<td>Burford</td>
<td>Mr</td>
<td>Chandler</td>
<td>97</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 184</td>
<td>I would like to raise concern regarding the &quot;the Burford-Charlbury segment&quot; which is on pages 285-305 of the local plan. This segment had previously been deemed unsuitable and there is no mention on why it has suddenly become suitable. Some of the reasons behind its unsuitability are as follows: 1. It is in an AONB and conservation area. 2. No surveys have been carried out prior to adding it into the local plan at the last minute. This failure means that the steepness of the field has not been taken into consideration, along with natural springs running through the field, the requirement to carry out serious drainage works, risk of flooding if this field is taken up with buildings, the direction of the water run off. 3. The increase in the amount of houses will mean a 25% increase in population. No plan or mitigation has been put in place for sewage, vehicle movement, doctor surgery and schools. 4. There is an existing issue with flooding of Witney street and the meadows leading down to the wind rush. The increase in run off will mean the meadow and road will flood more often and for longer periods of time. 5. Suitable access. The previous draft plan identified this as an issue. Frethern close can take no further traffic. There has been an increase over the years of 30 houses which has left parking and passing difficulties along the close. Barns lane is narrow and two cars cannot pass. 6. There has been no consultation with the locals or town council. The town council has offered a location north of the A40, less than 800 metres from this segment. There has been a small % of opposition to this location. However it is supported by the majority of Burford residents if the number of houses proposed was reduced to a realistic amount. I would like to state that adding this segment into the local plan at this late date, shows a disregard for the environment and for the previous work that had high lighted the fact that this is not suitable. It is a lazy piece of work which I believe WODC have put forward to raise objections and move the blame for their lack of in</td>
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<td>MM425</td>
<td>Carterton Construction</td>
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<td>Carterton Construction</td>
<td>Carterton Construction</td>
<td>973</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 184</td>
<td>depth studies into over more viable options. This segment should be removed and WODC taken to task for proposing such a poor option.</td>
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<td>2.48 The proposed revised text states that &quot;the development potential of land surrounding Burford is heavily constrained by the sensitivity of the landscape although there is scope for an extension of the built-up area to the east.&quot;</td>
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<td>2.49 Burford is located within the Cotswolds Area of Outstanding Natural Beauty and as such, as recognised by the Council in the proposed modification text, it is a sensitive landscape. In accordance with Paragraph 115 of the NPPF, great weight should be given to conserving the landscape and scenic beauty of the AONB. Section 85 of the Countryside and Rights of Way Act 2000 requires public bodies, including regional and local planning authorities, to have due regard to the purposes of designation in carrying out their functions.</td>
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<td>2.50 The NPPF does however acknowledge that development within the AONB can be acceptable in certain circumstances. With regards to the consideration of planning applications, paragraph 116 of the NPPF makes clear that the consideration of such schemes should include an assessment of:</td>
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<td>• &quot;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;</td>
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<td>• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and</td>
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<td>• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.&quot;</td>
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<td>2.51 Following the Council’s own detailed assessment they have determined that land to the east of Burford is suitable for allocation. It is the only proposed allocation in Burford over the Plan period, and accounts for just 0.6% of the total housing requirement. We support the proposed allocation of land east of Burford and set out our consideration of the allocation in further detail in relation to main modifications 191-193, Policy BC1b: Land East of Burford below.</td>
</tr>
<tr>
<td>MM376</td>
<td>Stagecoach in Oxfordshire/Stagecoach West</td>
<td>Nick Small, Stagecoach Bus</td>
<td>Dr</td>
<td>Small</td>
<td>1026</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>Stagecoach agrees with the conclusion that opportunities to meet development needs sustainably without unacceptable impacts on the natural and built environment, including transport infrastructure, are relatively modest. The identification of 1000 dwellings requirement is therefore very hard to accommodate, and we note with some concern that the two largest service centres, Burford and Charlbury, will see only a very modest proportion of that quantum allocated within or adjacent. Nearly 30% of this quantum is anticipated to be delivered as &quot;windfall&quot;, and given the natural and policy constraints on the area it is far from clear whether such capacity really exists.</td>
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<td>Many of the sites identified have little real choice but the private car to meet day-to-day travel needs. It is recognised, however, that all the settlements featuring allocations do offer some level of public transport provision.</td>
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Apart from service S3 in Stonesfield and Charlbury, bus services, where they do exist, are commercially marginal. It would be rational and justifiable to seek to concentrate development in locations which are on existing bus services (tending to be the largest villages/settlements) where environmental constraints are the least pressing, to help sustain their longer-term viability. Burford appears to us to offer more such opportunities than Charlbury.

Currently 37 houses are being built on the Charity Farm site, which was in the previous Local Plan. At the same time a further 13 houses are being built on the Ridings and 8 houses were built also on the Ridings two years ago - neither of these developments were on any Plan.

These are 58 new houses built, or being built, since 2015, not including a number of individual in fill plots in the village.

The 2031 Plan shows a single development plot of 15.5 acres for 50 homes in Stonesfield north of the Woodstock Road. See extract from the Council’s exhibition panels.

* There are no employment opportunities in the village, ensuring that everyone must commute. Although there is a bus route to Oxford, if your place of work is anywhere else it inevitably means using a car. How can this be sustainable or meet emissions standards?

* Stonesfield only has narrow country lanes, no main road or access to train.

* Water and sewage treatment are already hard pressed.

* The primary school is already full, new classrooms will need to be built - where is the planning for this?

* The pre-school is already at maximum capacity.

There’s one village shop and the pub has just been closed. Together with the houses currently being built, this will see a nearly 17% increase in housing in Stonesfield, from 644 to 752. These numbers will inevitably put stress on the infrastructure and alter the character of the village. I would note the following:

There are also grounds to think the Local Plan to 2031 is not legally compliant and did not meet Community Involvement criteria. There was next to no communication from the District or Parish Councils about the scale of the development in Stonesfield via the village newsletter.

Further, the information given in the travelling exhibition (I saw it in Woodstock on 19 December) and on the web site, in both the PDFs of the panels and the Schedule of Proposed Main Modifications, clearly states that the entire site north of the Woodstock Road was for 50 homes on 15.5 acres.

However, at Stonesfield Parish Council’s meeting on 19 December Catherine Teplow West, WODC Head of Planning Development Control, confirmed that pre-planning permission had been granted to CALA Homes to build 68 houses on just 8.2 acres. Therefore the information made available to the public does not match what WODC’s Head of Planning is agreeing in private with the developer.

Not only has the number of houses increased, but the remaining 7-3 acres will be ripe for development at a later stage, no doubt for a further 50 or so houses. This makes a mockery of...
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1578</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>local consultation when the village has no idea what the actual figure is. For this reason I do not believe the consultation has been legally compliant.</td>
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<td>MM729</td>
<td>R A Cutler</td>
<td>Mr</td>
<td>Cutler</td>
<td></td>
<td>1684</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>The Local Plan now calls for 1026 units in the Charlbury and Burford sub-area, as noted in 9.6.31. It's modest, reflecting the region's rural and historic character and would be best made up of small and medium sites of up to between 50 and 100 units. There have been 207 completions to date. That leaves a balance of 819 homes to build. Permissions for 317 units on small and medium sites are granted and expected to be completed in the Plan Period. So there are 502 permissions for homes still needed over the next 15 years. WODC propose specific allocations for 219 units, leaving a balance of 283 units from windfall. 122 small windfalls have been permitted in the recent past and are in the pipeline, plus some of the completions will no doubt be small windfalls, so it's reasonable to assume that more than 283 will come forward in the next 15 years. Applications for this type of development remain buoyant, so there may not be a need for so many allocations in this sub-area. We are aware that paragraphs 115 and 116 of the NPPF attach great weight to conserving landscape and scenic beauty in Areas of Outstanding National Beauty, where major development should be refused except in exceptional circumstances. Given the constraints imposed by the AONB, we question whether any housing allocations in the AONB settlements is possible at this late stage of the plan. We suggest that the approach to plan-led development in West Oxfordshire’s AONB settlements such as Charlbury needs to be careful and considered, perhaps following the approach taken by local planning authorities such as Winchester, Horsham and North Kesteven where a plan-wide allocation for certain, smaller scale settlements is set, with development coming forward either (a) as part of a Neighbourhood Plan or other locally supported initiatives, such as a Planning Brief, or (b) by means of a planning application that is supported at the local/Parish level. This approach has been tested at EIP/hearings recently, and held to be sound.</td>
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<td>MM746</td>
<td>Hallam Land Management</td>
<td>Hallam Land Management</td>
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<td>Hallam Land Management</td>
<td>1820</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>Non-Strategic Allocations, Land East of Burford (Main Modifications 185, 187, 191 and 193) The proposed allocation ‘Land East of Burford’ is located wholly within the Burford Conservation Area which was designated in 1970. The site also forms part of the setting of Burford High Street, the historic core of the Conservation Area which contains a high number of listed buildings. The site is also in the Cotswolds AONB which was designated in 1966 in recognition of its special landscape character. Paragraph 126 of the NPPF states that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment and ‘recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate for their significance’. Designated heritage assets including Conservation Areas and listed buildings are further protected by the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72 of the 1990 Act states that with respect to land in a conservation area ‘special attention shall be made to the desirability of preserving or enhancing the character or appearance of that area.’ In relation to listed buildings, the Section 66 states that when considering whether to grant planning permission for a development which affects a listed building or its setting, the decision maker must ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’. Whilst an allocation in a local plan is not tantamount to a permission itself, it does provide certain assurances that the principle of development of the site is accepted. Historic England have produced guidance on the process of local plan allocations affecting heritage assets in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans. The guidance encourages local authorities to properly</td>
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consider the historic environment in preparing local plans, helping them to ensure that the statutory tests are met and that the plan can be sound. In particular, the note sets out that local planning authorities should make sure that the significance of heritage assets is understood when considering allocations, ‘this involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value’ (Historic England Advice Note pg. 4).

The suitability of the site for development has been questioned throughout in the emerging evidence base for the local plan and has been discounted as unsuitable in the 2014 Strategic Housing and Employment Land Availability Assessment (SHELAA). It is unclear, without any further heritage or landscape evidence having been produced, how this position has changed in the interim period to the 2016 SHELAA, changing the recommendation from ‘not suitable’ to ‘suitable’. The 2014 SHELAA assessed the site (143 and 144) as unsuitable for development stating that the site: ‘forms part of attractive entrance to Burford from the east and is a key element of the local character. Very poor access to site would prevent development without large scale tree felling. Site contributes to the character of the Conservation Area. ‘The impact on the setting of the Conservation Area outweighs the need for development in this part of town’

In contrast the 2016 SHELAA now states that ‘whilst views of the site can be achieved from the north-east development if designed sensitively [it] would read as part of the existing built form of the town.’ The reason for the conclusion of suitability is set out in the SHELAA that ‘the site is considered suitable for development subject to overcoming access constraints and provided development is designed to read as part of the existing settlement’.

There is no explanation in the SHELAA or the Local Plan evidence base of how such a different conclusion to that of 2014 has been reached, or for that matter why reference is now made in the Main Modifications to the acceptability of development in the east of the town with no evidence to support it.

The 2014 assessment states that the site itself contributes to the character of the Conservation Area. Although there is no Conservation Area Appraisal for the Burford Conservation Area, it is reasonable to conclude that this greenfield site has been included in the conservation area (since its extension in 1991) due to its openness, and contribution to the green setting of the built up area of the town itself.

Land to the East of Burford forms part of the overall landscape setting of the Conservation Area and is important in terms of its undeveloped character. It is not clear from the proposed Main Modifications how development of the site so that it would ‘read as part of the existing built form of the town’ would preserve the or enhance the character and appearance of the area which is important for its open and undeveloped nature. It is therefore contended that this development would cause harm to the Conservation Area.

Case Law has clarified the interpretation of the statutory duties to preserve and enhance heritage assets. In the Court of Appeal Decision R (on the application of The Forge Field Society and others) v Sevenoaks District Council (Case No [2014] EWHC 1895 (Admin)) where there was need for development but the development would cause harm to heritage assets, the need to consider alternative sites was emphasised as part of the statutory duty of preservation. In this case, the site was in the AONB, a conservation area and in the setting of grade II* and grade II listed buildings. Linblom J set out in the decision that:

The lack of an updated evidence base with regards to proposed allocations and the historic environment indicates that the plan has not been positively prepared, is not consistent with national policy and does not meet the legal requirements for protecting and conserving the historic environment.

This raises concerns about the level of research the Council have done into the impacts of the development
on the natural and historic environment. The SA Appendix 5, which assesses the proposed non-strategic allocations, states that Land to the East of Burford does not contain any designated heritage assets and considers that potential impact on Proposed Local Plan policy OS4 (High Quality Design) will provide sufficient mitigation of harm (pg 97).

The site selection process and the sustainability appraisal are clearly fundamentally flawed, it does not get close to understanding the potential harm and impact of a potential development on a nationally significant conservation area with a high proportion of listed buildings and a pristine historic core. While the SHELAA assessments refer to the conservation area, the site selection process appears to have been blind to these potential risks and has failed to properly consider viable alternatives which are less constrained and more appropriate. This is further compounded by the fact that the Cabinet Agenda Report from the 39th October 2016, when the main modifications were approved by Cabinet stated that the Land East of Burford, ‘lies outside (although adjacent to) the Burford Conservation Area’. This raises serious concerns and does not instill confidence that the Council have considered the site allocations in anywhere near enough detail, indeed the Council made a decision to progress to consultation based on false information put in front of them.

Landscape Impact

The proposed allocation at Land to the East of Burford is located within the Cotswolds AONB. Paragraph 115 of the NPPF sets out that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty’.

Areas of Outstanding Natural Beauty are designated in accordance with the Countryside and Rights of Way Act 2000 which confirms that the purpose of designating AONBs is the conservation and enhancement of natural beauty of the area. It also requires a management plan to be produced for each AONB to formulate policies for local authorities and for carrying out their functions in managing it.

The most up to date landscape assessment for the district is the West Oxfordshire Landscape Assessment 1998 (WOLA). The WOLA identifies Burford as being part of the Upper Windrush Valley As set out in the proof of evidence of Mr. Benjamin Rosedale at the recent appeal inquiry for Land at Shilton Road, the site is widely visible from the north and east and contributes to the distinction between the northern areas of Burford and the historic core on the river terrace to the south. The WOLA identifies several characteristics of the Upper Windrush Valley Landscape Character Area which are set out in Mr. Rosedale’s proof of evidence:

• ‘moderate to high intervisibility, distant views along and across the valley;
• valleyside/urban edge very visible from Fulbrook;
• classic distant view of the church spire approaching Burford on the A40;
• urban edge harsh in places, particularly viewed from A40 entering Burford and on Witney Street;
• urban silhouette from valley floor harsh in places’.

The WOLA also identifies key sensitivities including that any further urbanisation of the A40 corridor should be resisted as change would be visible. Overall, in his proof of evidence, Mr. Rosedale concludes that:
"It is clear that the development to the east of Burford would be both prominent and harmful to the distinct character of Burford when viewed from the east and north (largely from locations within the AONB).

The allocation of the land to the east of Burford should not be allocated in the WOLP. It is not sound in terms of national policy, or justified in terms of evidence base.

Proposed Housing in Burford (Main Modifications 185)

For the reasons set out above regarding the lack of soundness of allocating the land to the east of Burford (MM193) but also regarding the need for a positive planning strategy in relation to Burford, and the failings of the provision made across the district to meet housing needs, land off Shilton Road Burford should be allocated for development (SHELA site 146).

While the site has been the subject of a recent appeal, the outcome of which is awaited, the WLOP should have included the site as an allocation in the Plan to ensure a sound approach. The SHELA itself demonstrates that the site is accessible and is supported by the Town Council. It is unconstrained in comparison with other sites in the District and in particular in the Sub-area. Not in a Conservation Area or AONB. The site is very well related to existing development, including to the south of the A40, where the secondary school and Burford Garden entre among other uses are located. As is accepted in the SHELAA the site is partially enclosed.

Development in this location would also deliver other wider benefits including improvements to sustainable transport infrastructure in the town - to include new pedestrian routes and crossings of the A40 and public transport measures.

The negative conclusions of the SHEELA as to site suitability are limited to a perception of distance from the town centre which is contradicted by the evidence in the SHEELA of the town centre being within 10-20 minutes walk of the town centre an accessible to other locations and facilities. Moreover the SHEELA does not take account of the potential enhancements to local walking routes or of the fact that a public transport service to the town centre and other destinations stops outside site 146 on the Shilton Road.

Suitable development in this location would accord with the aspirations of the Town Plan and the WOLP in respect of Burford and should be positively planned for in the WOLP. Its omission is inconsistent with the evidence base.

The NPPF
Paragraph 14 sets out the presumption in favour of sustainable development. For plan-making this means that Local Plans should meet objectively assessed needs (OANs)… UNLESS (my emphasis) … "specific policies
in this Framework indicate development should be restricted". Footnote 9 includes AONBs among the areas where such specific policies would apply to restrict development.

One interpretation of that paragraph would be that within the ‘restricted’ areas, OANs should not be met at all. At the very least it means there is no obligation to do so. Rather, the correct approach is to look next at the policies relevant to the land or area concerned. So for example, in the Green Belt, residential development for its own sake would be inappropriate in principle and ‘very special circumstances’ would be needed to justify it - or, as in some cases, land might be excluded from the GB to allow development to proceed.

Further, the case of Forest of Dean v SoSCLG & Gladman Developments Ltd [2016] EWHC 421 (Admin) was concerned with a grant of planning permission but the Court was considering precisely the same wording in both parts of paragraph 14 and in footnote 9. Just as in that case their effect was to dis-apply the presumption in favour of permission, so must that also be the case “where specific policies... etc” for plan-making purposes.

Paragraph 113 goes on to state that “Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.” It says nothing about meeting OANs within such areas because that is already addressed by the strongly worded provisions of paragraph 14. And as advised at paragraph 47, local plans should meet relevant OANs in full “as far as is consistent with the policies set out in this Framework.”

The WOLP
As acknowledged at WOLP 9.6.1, the vast majority of the Burford/Charlbury sub-area is within the Cotswolds AONB. To decide on the amount of housing, if any, that should be provided within it across the plan period, it follows from the above that it is necessary first to look at relevant planning policy and the purpose and objectives of the designation. Section 85 of the CROW Act 2000 effectively confirms that the purpose of designation is the conservation and enhancement of the natural beauty of the area, while NPPF para 115 advises that AONBs “have the highest status of protection in relation to landscape and scenic beauty” and that “great weight should be given to conserving (their) landscape and scenic beauty.” Regard must also be had however to the social and economic well-being of local communities within them.

Between them, WOLP Policies OS1, OS2, H1 and H2 currently refer to AONB policies for the purpose of decision-making but nowhere are the terms of NPPF para 14 acknowledged or discussed in relation to plan-making. The policies therefore start on the wrong foot by imposing a requirement to meet part of the District’s wider OANs in the AONB, directly contrary to the passages quoted above. They then compound the error by setting an ‘indicative distribution’ for the sub-area based on no more than an arbitrary mathematical division of the district-wide figure and with no justification based on the needs of local communities within the AONB.

To set requirements arbitrarily derived from the district total is immediately to impose a burden on the AONB which is expressly excluded by paragraph 14 of the NPPF and which consequently risks undermining the primary purpose of the designation. Put another way, for decision-taking it is to pre-weight the scales in a way which is neither sanctioned nor even permitted under the NPPF provisions before any assessment against AONB policies (in particular NPPF paras 115 and 116) can be made. In short, it is to put the cart before the horse.

This flaw in the WOLP approach has been amply illustrated recently by appeal decision APP/D3125/W/16/3143885 – Land south of High Street, Milton-under-Wychwood. At paragraph 39, the
Inspector stated that the emerging LP "requires the construction of 800 dwellings" (it doesn’t – but an understandable misinterpretation) in the B/C sub-area over the plan period. In the next paragraph, he noted that the Council accepted that there was no scope for meeting that requirement in the sub-area on sites outside the AONB. Which begs the question of whether that ‘requirement’ is legitimately imposed on the sub-area at all, given that virtually all of it is in the AONB.

Throughout paragraphs 39 – 43 of the decision, there is an acceptance of the need for housing in the B/C sub-area by both the Inspector and the Council – but a need based entirely on the arbitrary figure set out in the WOLP. The Inspector to some extent based his conclusion on a local need for affordable housing ‘on the coat tails’ of market housing but did not look behind the wider based target of 800. That is not a criticism as it seems no-one, least of all the Council, suggested he should consider that question (and even if they had, he might well have felt it was not for discussion in a Section 78 appeal). The point, for present purposes, is that whatever the impact of that proposal in AONB terms, the scales were unjustifiably weighted in favour of it from the outset because of the failure to follow the NPPF provisions in relation to plan-making.

It is not enough to say, as at paragraph 9.6.25, that “it is appropriate that some future growth” takes place in the B/C sub-area simply because it has good transport links and a range of infrastructure. The former in fact are deteriorating with the withdrawal of subsidies to bus services. But even if they weren’t, this again is an arbitrary approach which ignores the purpose and objectives of the AONB designation and is not justified under national policy in an area "where specific policies indicate development should be restricted." A simplistic expectation of growth – as opposed to meeting local needs – again runs contrary to NPPF para 14 and is inherently inimical to the AONB designation by pre-loading of the scales when it comes to decision making.

None of this is to say that no new housing should be provided in the AONB nor that sites cannot be allocated for it under Local or Neighbourhood Plans. In Inspector Emmerson’s report on the Bath LP for example, he cited (among other points) Natural England’s advice that 2 proposed allocations would not undermine the purpose and objectives of the designation. Having (I assume!) made his own assessment of the sites and arguments for and against, he went on to support their allocation. Any housing provided as a consequence would contribute to the district wide targets (derived from wider OANs) but the site assessments should not have been driven by those OANs – because NPPF para 14 tells us they should not.

The same would be true of any windfall sites – they should be assessed first against the AONB policies, then against local needs but with little weight being given to their contribution to district-wide targets. It might also be the case that some growth of particular settlements would be justified in order to maintain their viability (e.g. as advised at NPPF para 55, albeit in relation to rural areas generally) – but that would still be to meet the needs of the local community rather than wider OANs arising independently of the AONB.

It may be said that some districts are so heavily constrained by their location and the restrictive policies affecting it that the meeting of more than just local needs becomes inevitable. Even if a whole district is within a designated area however, the starting point remains the ‘designation’ policy, not the OANs – again because the NPPF tells us so – though plainly, if those needs cannot be met outside the designated area, that point then comes into the equation. Importantly however this is not the case in West Oxfordshire where only about a third of the district lies within the AONB. In contrast, virtually all of the B/C sub-area does so but no justification is provided for the target of 1000 (or any number of) dwellings beyond the unsupported assertions already mentioned. Put this another way - where is the evidence that demonstrates a need to provide 1000 dwellings within this part of the AONB?

**Conclusion**
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<td>R O Evans</td>
<td>Mr</td>
<td>Evans</td>
<td>601</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>To conclude, the setting of arbitrary targets derived from district-wide OANs directly contravenes NPPF para 14 and therefore the (increase in the) target for the B/C sub-area in particular has not been justified. The correct approach, based on the NPPF, is to look at individual site allocations and proposals in the light of the purpose and objectives of the designation and policies relevant to it. Save in the rare case of national considerations affecting major developments, the question of need should also be considered in that light, which means meeting the needs of local communities not wider OANs that can and should be met outside the AONB. No-one wishes to see continuing delay to adoption of the WOLP. But this issue is of fundamental importance to its soundness. In my submission, what is needed is an acknowledgement of the effect of NPPF para 14 and a redrawing of the ‘indicative housing distributions’ [Policy H1], firstly to direct development to areas outside the AONB, secondly to reflect an assessment of the needs of local communities within it (which could be covered in Neighbourhood Plans), and thirdly, where possible, to allocate sites to meet those needs – but no more than that. That would leave windfall sites to be assessed properly, taking account of local needs, but not with the scales pre-weighted to meet an arbitrary target derived from the district wide OANs.</td>
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<td>603</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>The Charlbury Neighbourhood Forum is a community group set up by the Charlbury Town Council. It is currently preparing both Community Led and Neighbourhood Development Plans on the Council’s behalf. While I am a member of the Forum, this representation is made in a personal capacity as an interested local resident who was a Planning Inspector from 1991-2015. This objection is made without prejudice to my major objection to the setting of housing targets within the AONB. It is made to the revised wording of paragraph 9.6.31 and specifically, the use of the term ‘indicative housing requirement’ both there and in Table 9.5. That expression is not consistent with the terms used in para 5.22 and Policy H1. Both, and especially the policy, make it clear that the figures are “an indicative distribution and should not be taken as an absolute target (and in 5.22, ‘requirements’) for each sub-area.” The importance of the language used here is amply illustrated by appeal decision APP/D3125/W/16/3143885 – Land south of High Street, Milton-under- Wychwood. At para 39 the Inspector stated that the “emerging LP … requires the construction of 800 dwellings over the plan period…” and appears to have given weight to that ‘requirement’ accordingly. Whether or not his decision might have been different is not the point for present purposes – the Plan needs to be internally consistent in its wording to ensure weight is given correctly within development control decisions. 9.6.31 and Table 9.5 should refer to an “indicative housing distribution” not to a “requirement”.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>The Charlbury Neighbourhood Forum is a community group set up by the Charlbury Town Council. It is currently preparing both Community Led and Neighbourhood Development Plans on the Council’s behalf. While I am a member of the Forum, this representation is made in a personal capacity as an interested local resident who was a Planning Inspector from 1991-2015. This objection is made to the revised figures at Table 9.5, specifically to the number of dwellings shown as an existing commitment at Rushy Bank, Charlbury. To be consistent with the (new) para 5.21(b), the figure should include the 12 bed YDUK facility (Class C2), particularly as it is intended to be in the form of self-contained units. For the record, this has nothing to do with the planning merits of the development, only how it is counted in Table 9.5.</td>
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<td>Mr</td>
<td>Cobb</td>
<td>64</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>I am commenting on the proposal for 44 homes on the land south of Milton Road in Shipton-Under-Wychwood. I support the development of additional housing in this location, however I believe that 44 homes are far too many for the space, and for the village. The required level of density would be more like a town centre, than a rural village location. The nearby estate is at a lower density and the other housing nearby is mostly large detached houses. In addition, the village facilities are limited, with one small shop and an already busy primary school and very limited public transport. The plan does not seem to say how the needs of the additional residents will be met, particularly in the light of the large development planned in Milton-Under-Wychwood. Please note that this comment should be taken to also apply to the other sections where this proposal is made.</td>
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<td>MM379</td>
<td>Friends of Evenlode Valley and West Oxfordshire Cotswolds</td>
<td>Friends of Evenlode Valley and West Oxfordshire Cotswolds</td>
<td>Mr</td>
<td>Clemence</td>
<td>771</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 185</td>
<td>9.6.31 The term “indicative housing requirement” contradicts the allocation in H1 which is stated to be “an indicative distribution” which “should not be taken as an absolute target for each sub-area”. The use of “requirement”, indicative or otherwise, actually goes beyond “target&quot; and implies an obligation to be met and an assessment of underlying need which has not been undertaken. The setting of a requirement within an AONB is contrary to NPPF14 which disapplies the need to meet objectively assessed need in an AONB, and NPPF113, which requires a criteria led approach, rather than a requirement led approach, to planning in the AONB.</td>
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<td>2.52 Table 9.5 sets out the anticipated housing delivery in the Burford-Charlbury Sub-Area. The Sub-Area has been set an indicative housing requirement of 1,000 new dwellings to assist in meeting the District wide requirement of 13,200 new dwellings (excluding Oxford overspill). Table 9.5 sets out that up to 1,026 homes are anticipated to be delivered in the Sub-Area over the Plan period. This is the only Sub-Area in which sufficient completions, commitments and allocations are proposed in order to meet the indicative housing requirement for the Sub-Area. In order to meet this, the Sub-Area is however reliant on the delivery of 283 windfall units, and therefore the full 1,000 dwellings are not actually allocated within the draft Plan. 2.53 Including the windfall allowance, sufficient provision is proposed in order to meet the requirements of the Sub-Area, but there is only limited flexibility allowed for within this due to the Plan not allocating the full quantum of development. As discussed above in relation to the overall housing land supply, it is important that the Plan not only makes sufficient provision to meet the objectively assessed need for the District but also, as required by the NPPF, allows sufficient flexibility to allow for changing circumstances. 2.54 Whilst additional housing could be brought forward through Neighbourhood Plans there is no guarantee of this, and no mechanism in place in the policy should they not deliver. Currently the only Neighbourhood Plan area designated in the Sub-Area is in relation to Charlbury. 2.55 As currently drafted there is therefore concern as to whether the Plan will meet the housing requirement for the District as a whole.</td>
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<td>MM729</td>
<td>R A Cutler</td>
<td>Mr</td>
<td>Cutler</td>
<td>1674</td>
<td>&gt; SECTION 9 - STRATEGY</td>
<td>In light of the latest consultation on the emerging West Oxfordshire Local Plan we wish to draw the District Council’s attention to a possible development opportunity next to the station at Charlbury. The site is</td>
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<td>illustrated on the accompanying plans (pages 6 and 7 below) and is within a 400m walk to the station, which is considered by URBED, Manual for Streets and the County Council as “excellent” accessibility. This brings the prospect of Oxford-related development into the frame, including employment, but more pertinently in relation to Oxford’s unmet housing need; where accessibility to the city centre from housing next to the station at Charlbury is better than from the Oxford ring road! We are looking to deliver a new concept in housing – an 'Enterprise Village'. We have not had time to agree an approach with the landowner (the Cornbury Estate), but the area shown on our plan seems to satisfy our search criteria of: * An active and entrepreneurial community, * Accessibility, including to London and Oxford, * A high quality environment, and * Scope for combining employment and housing on the same site – ie placemaking. It is notable that it takes just 16 – 20 minutes (depending on the service) by train to get into central Oxford, and there are regular services (eg every 30 minutes) throughout the day. This is extraordinarily good accessibility and puts this part of Charlbury in contention as a location that can help satisfy a small part of the pressing unmet housing need for Oxford (estimated at 15,000 units across the four surrounding districts). The site would require an exceptional approach to design, sustainability and community engagement, but the result ought to be hugely interesting and successful, as well as prize-winning. This would not be a large scale development project, but perhaps 50 units on the front half of the site, plus work and innovation space, together with some form of community, café and/or cultural offer. This scale of development in the town has already been endorsed by the District Council with its proposal in the Proposed Modifications for 40 units north of Jefferson's Piece (MM185 et seq). We question how that proposal connects with Oxford (from a housing and employment point of view). Moreover, unlike Jefferson's Piece, and many other of the sites proposed in the AONB settlements, the land next to Charlbury Station is wholly deliverable within the first five years of the plan. Charlbury Enterprise Village Our working title is Charlbury Enterprise Village (&quot;CEV&quot;). We would aim to draw from leading historic precedents such as the Victorian Enlightenment movement that gave rise to the model villages of Bourneville (Cadbury), Port Sunlight (Unilever) and Trowse (Colman), combining decent housing and a strong community with close connections to employment. The concept has stood the test of time, most recently being successfully reinvented by the Duchy of Cornwall with projects in the South West, including Poundbury. With the demands of modern work, the digital economy and the importance of lifestyle, there is clearly an opportunity to revisit these precedents in a modern, forward-looking manner. Our idea is to use these unique circumstances to produce a groundbreaking, design-led 'Enterprise Village', combing the accessibility afforded by Charlbury Station with the pleasant lifestyle of living in a small Cotswold town, especially having regard for the abundance of creativity available within this engaged and connected local community. In particular, we believe this proposal has the ability to breathe new life into Charlbury and reinvent its raison d'etre for the Twenty First Century. The master plan would combine housing and employment, probably with some live-work units and a community space, such as a cafe, with of course excellent broadband. The design and public realm would foster community living and a sense of creativity, akin to college life, street life in Shoreditch (or Jericho), or</td>
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perhaps a small, rural version of Hammarby Sjöstad.

The scheme would comprise:
* Site area of 6.25 hectares gross, so plenty of room for landscape mitigation
* A net developable area of up to 3 hectares
* Approximately 2 hectares of residential
* Up to 50 residential units, possibly more as a later phase on ‘proof of concept’
* Possibly some care or sheltered accommodation
* Community benefits, to be agreed locally, but possibly improved accessibility to the station, public open space, and a financial contribution to the Parish Council to help promote the business and cultural offer in Charlbury.

It is the potential to satisfy some of Oxford’s unmet housing need that brings these ideas to the fore and makes them relevant, now, to the West Oxfordshire Local Plan. If the Proposed Modifications to this plan can propose over 2,000 houses north of the A40 at Eynsham, plus large schemes in Woodstock and Chipping Norton, then a small, innovative proposal for Charlbury is also possible. The key is integrating the employment element and making the most of the accessibility to Oxford.

There are two, mutually reinforcing approaches to the employment offer, comprising (a) R&D/technology/digital linked to Oxford and London and (b) artisan businesses rooted in the Cotswolds. Except for the live work element, the built form is likely to be the same – ie fairly simple B1 accommodation, capable of being used for offices, technology and light industrial. A good example in West Oxfordshire is Worton Park at Cassington (see: http://www.wortonpark.co.uk/content/business-park). Typical artisan businesses would include a bakery, cheesemaker (Alex James lives at Kingham, famous for ‘Blue Monday’ cheese, as well as Blur), a microbrewery (eg http://sixpennybrewery.co.uk/) or gin distillery, any one of which is likely to be able to support a café. The key is to draw out the synergies through active asset management and placemaking, two of Bloombridge’s core competences, as explained later in this document.

With the benefit of an allocation, there is no reason why 40 – 50 units at Charlbury Enterprise Village cannot start on site within two years; thereby addressing Oxford’s pressing need and the backlog of 1836 houses in the District.

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<td>Object MAIN 187 - In order to meet identified need four non-strategic site allocations are proposed The Burford Charlbury Sub-Area The housing allocation for the Burford-Charlbury sub-area has increased from 800 to 1,000 over the plan period. Para 9.6.34a states that “in order to help meet identified housing needs four non-strategic site allocations are proposed in the Burford - Charlbury sub-area.” In total 219 homes are envisaged on these allocated non-strategic sites, over 20% of the total for the sub-area.</td>
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We note that paragraph 4.38 of the Sustainability Appraisal (5A) states that "each potential non-strategic site allocation was subject to detailed SA (Appendix V) and no major significant negative effects were identified." However, the scope of this assessment is a series of high-level comments against the 15 SA objectives.

Whilst this is an entirely appropriate starting point, given the sensitivity of these sites - within the AONB and 3 within Conservation Areas - it is considered that further detailed assessment is required.

Carefully planned development in suitable locations is an appropriate means of meeting the identified housing need. The Council acknowledge this at para. 9.6.34g stating that "in terms of the scope for developing elsewhere, the Burford - Charlbury sub-area is washed over by a significant proportion of AONB designation. This in itself means that to meet future housing requirements, some development within the AONB will be necessary". We agree with this sentiment.

However, we are of the view that further examination of the sites is required. The allocated sites would benefit from the development of detailed indicative plans, capacity studies, and a consultant team assessing the impacts of the development on the CAONB, on designated heritage assets, on the highway network etc. For example, the proposed allocation of land north of Jefferson's Piece in Charlbury clearly has vehicular access issues which may affect deliverability and/or the number of units that can be achieved.

Paragraph 4.83 of the SA states acknowledges there is "uncertainty in the longer-term and until further detailed project level studies have been completed."

It is therefore far from certain whether these sites offer a realistic possibility of delivering the specified level of housing in the Plan period. For example the proposed allocation of land north of Jefferson's Piece in Charlbury clearly has vehicular access issues which may affect deliverability and/or the number of units that can be achieved.

Paragraph 4.83 of the SA states acknowledges there is "uncertainty in the longer-term and until further detailed project level studies have been completed."

It is therefore far from certain whether these sites offer a realistic possibility of delivering the specified level of housing in the Plan period. For example the proposed allocation of land north of Jefferson's Piece in Charlbury clearly has vehicular access issues which may affect deliverability and/or the number of units that can be achieved.

It is unreasonable to simply assume these sites are deliverable by virtue of their inclusion as a main modification, and to proceed to use that as a basis to develop housing policies which seek to demonstrate a 5 year housing land supply.

Noting the constraints discussed within the Plan from paragraph 9.6.1 onwards, the Plan states that 283 homes will be delivered through windfall sites within the sub-area. Taken together with the four draft non-strategic allocations, this is a total of 502 homes (or 50% of the sub area's total indicative housing requirement).

Whilst making an allowance for windfall sites is an accepted means of predicting housing delivery over the Plan period, we are of the view that to rely on speculative development and draft allocated sites (which are the subject of ongoing consultation and examination) to the degree the Council have done is unsound.

Our recommendation is that the Plan should identify additional sites in order to reduce the reliance on windfall development to meet the housing requirement for the sub-area.

Proposed change MAIN 187 & MAIN 200 - the 'land south of Grammar School Hill' site is included as a non-strategic allocated site.
Land South of Grammar School Hill, Charlbury

Vanderbilt Homes have submitted an outline application at Land South of Grammar School Hill, Charlbury. The site is identified in red on the appended plan. The outline application was submitted following detailed development of the proposals, with full assessment of the impacts of the development from heritage experts, landscape consultants, and transport consultants.

This level of detailed development of indicative proposals - including an examination of the capacity of site and the impact of the development - has not been undertaken in respect of other draft allocated sites in the Plan.

As discussed above, the proposed site allocations are at an early stage and will undergo further consultation and examination. There will be unresolved objections to these sites, and the Inspector may require further proposed modifications to be made.

Footnote 11 of paragraph 47 of the NPPF states how "to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

The application for up to 34 homes at Land South of Grammar School Hill Charlbury represents a carefully considered, sustainable, and deliverable site that would contribute towards the housing requirement for the sub-area. It is available now, achievable within the short term, and offers a realistic prospect of housing above that which is currently being considered by the Main Modifications to the Council's Local Plan.

We consider this site should be one of these additional allocated sites. It is available, and deliverable in the short term. It will contribute towards reducing reliance on windfall development in the Burford-Charlbury sub-area, providing an element of certainty in respect of tangible, tested, and deliverable sites.

In order to assist towards making MAIN 200 is sound, we therefore recommend that the site at 'land south of Grammar School Hill, Charlbury' (as identified in red on the attached plan) is included in the emerging Plan as a non-strategic allocated site.

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<td>MM746</td>
<td>Hallam Land Management</td>
<td>Hallam Land Management</td>
<td>-</td>
<td>Hallam Land Management</td>
<td>1821</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 187</td>
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Section 72 of the 1990 Act states that with respect to land in a conservation area ‘special attention shall be made to the desirability of preserving or enhancing the character or appearance of that area.’ In relation to listed buildings, the Section 66 states that when considering whether to grant planning permission for a development which affects a listed building or its setting, the decision maker must ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.

Whilst an allocation in a local plan is not tantamount to a permission itself, it does provide certain assurances that the principle of development of the site is accepted. Historic England have produced guidance on the process of local plan allocations affecting heritage assets in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans. The guidance encourages local authorities to properly consider the historic environment in preparing local plans, helping them to ensure that the statutory tests are met and that the plan can be sound. In particular, the note sets out that local planning authorities should make sure that the significance of heritage assets is understood when considering allocations, ‘this involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value’ (Historic England Advice Note pg. 4).

The suitability of the site for development has been questioned throughout in the emerging evidence base for the local plan and has been discounted as unsuitable in the 2014 Strategic Housing and Employment Land Availability Assessment (SHELAA). It is unclear, without any further heritage or landscape evidence having been produced, how this position has changed in the interim period to the 2016 SHELAA, changing the recommendation from ‘not suitable’ to ‘suitable’. The 2014 SHELAA assessed the site (143 and 144) as unsuitable for development stating that the site: ‘forms part of attractive entrance to Burford from the east and is a key element of the local character. Very poor access to site would prevent development without large scale tree felling. Site contributes to the character of the Conservation Area. ‘The impact on the setting of the Conservation Area outweighs the need for development in this part of town’

In contrast the 2016 SHELAA now states that ‘whilst views of the site can be achieved from the north-east development if designed sensitively [it] would read as part of the existing built form of the town.’ The reason for the conclusion of suitability is set out in the SHELAA that ‘the site is considered suitable for development subject to overcoming access constraints and provided development is designed to read as part of the existing settlement’.

There is no explanation in the SHELAA or the Local Plan evidence base of how such a different conclusion to that of 2014 has been reached, or for that matter why reference is now made in the Main Modifications to the acceptability of development in the east of the town with no evidence to support it.

The 2014 assessment states that the site itself contributes to the character of the Conservation Area. Although there is no Conservation Area Appraisal for the Burford Conservation Area, it is reasonable to conclude that this greenfield site has been included in the conservation area (since its extension in 1991) due to its openness, and contribution to the green setting of the built up area of the town itself.

Land to the East of Burford forms part of the overall landscape setting of the Conservation Area and is important in terms of its undeveloped character. It is not clear from the proposed Main Modifications how development of the site so that it would ‘read as part of the existing built form of the town’ would preserve the or enhance the character and appearance of the area which is important for its open and undeveloped nature. It is therefore contended that this development would cause harm to the Conservation Area.

Case Law has clarified the interpretation of the statutory duties to preserve and enhance heritage assets. In
the Court of Appeal Decision R (on the application of The Forge Field Society and others) v Sevenoaks District Council (Case No [2014] EWHC 1895 (Admin)) where there was need for development but the development would cause harm to heritage assets, the need to consider alternative sites was emphasised as part of the statutory duty of preservation. In this case, the site was in the AONB, a conservation area and in the setting of grade II* and grade II listed buildings. Linblom J set out in the decision that:

The lack of an updated evidence base with regards to proposed allocations and the historic environment indicates that the plan has not been positively prepared, is not consistent with national policy and does not meet the legal requirements for protecting and conserving the historic environment.

This raises concerns about the level of research the Council have done into the impacts of the development on the natural and historic environment. The SA Appendix 5, which assesses the proposed non-strategic allocations, states that Land to the East of Burford does not contain any designated heritage assets and considers that potential impact on Proposed Local Plan policy OS4 (High Quality Design) will provide sufficient mitigation of harm (pg 97).

The site selection process and the sustainability appraisal are clearly fundamentally flawed, it does not get close to understanding the potential harm and impact of a potential development on a nationally significant conservation area with a high proportion of listed buildings and a pristine historic core. While the SHELAA assessments refer to the conservation area, the site selection process appears to have been blind to these potential risks and has failed to properly consider viable alternatives which are less constrained and more appropriate. This is further compounded by the fact that the Cabinet Agenda Report from the 19th October 2016, when the main modifications were approved by Cabinet stated that the Land East of Burford, ‘lies outside (although adjacent to) the Burford Conservation Area’. This raises serious concerns and does not instill confidence that the Council have considered the site allocations in anywhere near enough detail, indeed the Council made a decision to progress to consultation based on false information put in front of them.

Landscape Impact

The proposed allocation at Land to the East of Burford is located within the Cotswolds AONB. Paragraph 115 of the NPPF sets out that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty’.

Areas of Outstanding Natural Beauty are designated in accordance with the Countryside and Rights of Way Act 2000 which confirms that the purpose of designating AONBs is the conservation and enhancement of natural beauty of the area. It also requires a management plan to be produced for each AONB to formulate policies for local authorities and for carrying out their functions in managing it.

The most up to date landscape assessment for the district is the West Oxfordshire Landscape Assessment 1998 (WOLA). The WOLA identifies Burford as being part of the Upper Windrush Valley Area as set out in the proof of evidence of Mr. Benjamin Rosedale at the recent appeal inquiry for Land at Shilton Road, the site is widely visible from the north and east and contributes to the distinction between the northern areas of Burford and the historic core on the river terrace to the south. The WOLA identifies several characteristics of the Upper Windrush Valley Landscape Character Area which are set out in Mr. Rosedale’s proof of evidence:

- ‘moderate to high intervisibility, distant views along and across the valley;
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<td>MM750</td>
<td>Kemp and Kemp</td>
<td>Jon Waite</td>
<td>Mr</td>
<td>Waite</td>
<td>1831</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 187</td>
<td>The WOLA also identifies key sensitivities including that any further urbanisation of the A40 corridor should be resisted as change would be visible. Overall, in his proof of evidence, Mr. Rosedale concludes that: 'It is clear that the development to the east of Burford would be both prominent and harmful to the distinct character of Burford when viewed from the east and north (largely from locations within the AONB). The allocation of the land to the east of Burford should not be allocated in the WOLP. It is not sound in terms of national policy, or justified in terms of evidence base.</td>
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<td>MM32</td>
<td>Graham Cobb</td>
<td>Mr Cobb</td>
<td>Cobbb</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 187</td>
<td>I am commenting on the proposal for 44 homes on the land south of Milton Road in Shipton-Under-Wychwood. I support the development of additional housing in this location, however I believe that 44 homes are far too many for the space, and for the village. The required level of density would be more like a town centre, than a rural village location. The nearby estate is at a lower density and the other housing nearby is mostly large detached houses. In addition, the village facilities are limited, with one small shop and an already busy primary school and very limited public transport. The plan does not seem to say how the needs of the additional residents will be met, particularly in the light of the large development planned in Milton-Under-Wychwood. Please note that this comment should be taken to also apply to the other sections where this proposal is made.</td>
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<td>MM52</td>
<td>Cherie Chopping</td>
<td>Mrs Chopping</td>
<td>Chopping</td>
<td>116</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 188</td>
<td>I refer to the above Local Plan '20 31' and write to object strongly to the plans and proposals to build yet more houses in our rural village of Stonesfield. This latest version of the Draft Local Plan outlining permission for additional new houses in our small rural village will destroy the character and fabric of our already over stretched community. Stonesfield is a rural location with scant public transport to outlying larger conurbation and as such has nurtured a country community and ethos giving this village its' uniquely special mild and gentle disposition. We have already had substantial housing development to our village over the past decade which has affected...</td>
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<td>MM72</td>
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<td>Peter Mathias</td>
<td>Mr</td>
<td>Mathias</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 188</td>
<td>deeply the foundations of the character of Stonesfield. We cannot withstand yet more disproportionate development to our village without it compromising the existing community and its ‘personality’ still further. It would appear that this latest proposal has had little regard to our community and appears to target a small gentle village and a ‘path of least resistance’ in order planning targets are met irrespective of the appropriateness of the decision. Larger communities such as Charlbury and Burford can withstand such developments having little or no effect on their community given the actual size of these conurbation versus Stonesfield (the undersigned recalling a population of just 1700 people - therefore another circa 100 houses would bring an influx of new people and population far beyond a sustainable / absorbable level to our tiny village). Please can we preserve our village and community and not fall prey to larger communities and their voices. Stonesfield is a gentle community with a gentle rural voice that is a national treasure to be preserved not exploited as ‘easy prey’ to national needs for target setting planning policies. These proposals are not fair and reasonable and are disproportionate and unsustainable if Stonesfield is to be allowed to keep its identity as a rural community and small thriving little Cotswold village in a conservation area of outstanding natural beauty.</td>
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<td>Mr and Mrs Payne</td>
<td>Mr and Mrs</td>
<td>Payne</td>
<td>266</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 188</td>
<td>I strongly object to the proposed development of fifty additional houses in Stonesfield, the proposed site is located outside the village boundary, is a greenfield site, and within an “Area of Outstanding Beauty”. By granting permission for these homes directly contradicts the council’s core strategy document and sets a dangerous precedent for the future. I am writing to comment on the modified local plan for West Oxfordshire 2031 and in particular on modification 188, which I don't believe is sound. As a resident of Stonesfield I am first of all very concerned about the disproportionate actual and proposed allocations in the village, compared to the other towns and villages in the Burford/Charlbury sub-area. Taking into account existing commitments (with planning, currently being built) and proposed commitments as per the plan, the size of Stonesfield (in terms of number of houses) is set to increase by 15.06%. This compares with other villages and towns as follows: Burford = 6.72%, Charlbury = 6.71%, Shipton = 8.13%, Milton = 8.65% and Kingham = 6.55%. The proposal to increase the size of the village by 15.06 % in one fell swoop is not sustainable and will affect the amenity of the current residents. It will have a massive negative impact on the character and nature of the environment, and will put pressure on the very limited existing services. West Oxfordshire planning principles state that any new development should be of an appropriate scale and that the need to travel, particularly by car, should be minimised. The proposed scale of the development here is clearly not appropriate and will lead to a very large increase in car use. The village has very little employment, no secondary school, no doctor or dentist and only one shop. Existing residents have to use their cars to access these services in other towns (eg Charlbury and Woodstock), as will any new residents, as public transport is limited. In addition, the nature of the country roads (and distance to services) which are narrow and pot-holed means that cycling is not a safe every day option. Intolerable strain will be put on the existing services, not least the primary school, which has restricted capacity for new pupils, and limited ability to extend, as it is situated wholly within the conservation area.</td>
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What's more, the sustainable development objectives include the fact that any new development should conserve the landscape and scenic beauty of the Cotswolds Area of Outstanding Natural Beauty. Stonesfield sits wholly within the AONB and all of the proposed developments are on Greenfield sites. New building will negatively impact the environmental and aesthetic qualities of the village.

I consider that the proposed number of houses be revised down by at least 50% to come in line with proposals in other similar villages. At this time Cala homes have already made a presentation in the village, stating that they wish to build 67 houses on only half of the land available north of the Woodstock Road. This is already more than the consultation document proposes and it is clear that they will then apply for permission to build on the rest of the land.

I believe that residents of Stonesfield should have the opportunity to participate at the oral examination. We would be happy to if necessary.

First we are concerned about the extent to which West Oxfordshire District Council’s planning policy as expressed in the Local Plan 2031 on which the Council is consulting differs from the proposed implementation of that policy.

We have obtained information including some from members of the West Oxfordshire Planning Policy Department and we have also looked at the information that has been provided on line with the Local Plan.

The West Oxfordshire local plan to 2031 does not include all of the planned housing developments in Stonesfield that together will increase the size of Stonesfield (on greenbelt land) by about one third from the existing c 645 houses to 845 houses or more.

Consultation as well as excluding the above overall mass development only invites comment on the newly included development proposed for just north of the Woodstock Road in Stonesfield. Information provided in the draft plan for this development is both inaccurate and misleading.

The draft West Oxfordshire Local Plan to 2031 states that the whole site off the Woodstock Road recently added to the Plan is 6.25 hectares (15.5 acres) in size and the draft WODC local plan currently proposes a development of 50 houses on the whole site.

On the first of December 2016 a housing development proposal was presented by a developer CALA Homes at a Parish Council meeting informing the Councillors and public present that 68 homes (not 50) would be built on 8.2 acres of the 15.5 acres site.

This proposal for a much more dense development to build 68 houses on just over half of the site was presented as a “done deal” following meetings which CALA said was with the WODC Planning Housing Development Control Team.

CALA presented detailed site plans which they suggested had already been agreed with West Oxfordshire Development Control Planners and told us that nothing is sacrosanct about the Local Plan mentioning 50 homes. We also believe that CALA can, and very likely will, continue to build possibly another 55 houses on the remaining 7.3 acres of the field at a future time.

At a meeting on Friday 9TH December 2016 members of Stonesfield Parish Council met with West Oxfordshire District Council Head of Planning Development Control. She confirmed that permission had indeed been granted for CALA Homes to build 68 homes on just 8.2 acres of the 15.5 acres site instead of the
50 houses on the whole site as presented for consultation in the draft local plan.

The West Oxfordshire District Council Head of Planning Development Control suggested a mistake had been made in the Local Plan papers and that the 50 homes specified in the draft plan should have been presented as 50 to 70. She did not explain why only 8.2 acres of the 15.5 acres site was being used or why this much greater density of building than in the Plan had been approved. The development of 68 houses now proposed by CALA Homes on 8.2 acres of the 15.5 acres site just north of the Woodstock Road is a significant increase in density from the 50 proposed in the West Oxfordshire draft local plan now out for consultation.

The statutory Local Plan 2031 consultation process which ends on 23 December 2016 has therefore been based on inaccurate and misleading information as well as missing the details of the large overall housing development planned for Stonesfield. We do not believe the present consultation process is valid nor that it meets the requirements of such a process.

We believe that West Oxfordshire District Council should correct the Local Plan making clear the plans for the overall future development of Stonesfield and in particular how many houses are actually planned for the 15.5 acres site just north of the Woodstock Road. Is the Plan to build on the whole site in the future? If so how many houses will eventually be built on the whole site? We know 68 houses will be built on just 8.2 acres of the site. We ask that when the present inaccurate, misleading and missing information has been corrected in the West Oxfordshire Local Plan a repeat period of consultation be arranged to give members of our community a properly informed chance to respond to the correct house build figures that are planned.

Our second concern is that there is a disproportionate amount of new building planned for Stonesfield relative to the size of the village and no adequate mitigation plan has been considered before the mass housing development of Stonesfield started.

Most people in Stonesfield realise that there are national and local targets to build more houses, especially affordable units and that each development, apart from very small housing development applications, will have to incorporate an 'affordable' element. People understand that this is part of the national as well as the local policy. We welcome some new houses and new people joining the Community in Stonesfield but we have several concerns which we present below.

The size of the overall housing development planned for Stonesfield will fundamentally change the character of the village and bring with it significant problems not least for our Primary School.

The effects of the combination of different housing developments in the village indicated above need to be considered together. We are told that no actions are being considered to mitigate the problems identified.

In the recent past we have seen the 7 house Cotsway Development off the Combe Road, Blenheim developments of 13 houses, now the Charity Farm Development with its 37 houses and the Farley Lane Development with 13 homes which are currently progressing. Other planned development include proposals for 68 houses on the land off Woodstock Road, 15 homes on part of the land at North Farm and perhaps at least another 55 homes on the medium sized sloping field fronting Combe Road currently belonging to the Blenheim Estates as well as another 30 or 40 houses on Blenheim land along the Ridings as an extension to Ridings Close.

This could give us a possible 190 additional houses in Stonesfield. Perhaps well over 200 houses if CALA return to develop the rest of the site off the Woodstock Road. This overall size of development will increase the size of Stonesfield (on greenbelt land in an area of outstanding natural beauty) by about one third from...
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<td>This size of overall development cannot be managed site by site and we must have an adequate mitigation plan in place before further development starts or is even agreed.</td>
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<td>There has been insufficient detailed consultation with the Community of Stonesfield about the long term as well as the short term detrimental effects on the village of the planned housing development including the education of its young people, the environment, the landscape and recreational opportunities as well as seeking views on the extent to which any detrimental effects could be moderated. For example there is a need to consider the effect of the proposed mass housing development of Stonesfield on the Stonesfield Primary School and our Pre School</td>
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<td>The Stonesfield Primary School as it now stands will not be able to cope with the likely increase in pupil numbers from further housing development in Stonesfield including the 68 houses on the 8.2 acres off the Woodstock Road proposed by CALA Homes.</td>
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<td>The school and all those concerned with it must have time to plan for any growth and actions must be taken to accommodate it and deal with the difficulties before further houses are built.</td>
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<td>Stonesfield Primary School Governors have considered the impact, of the proposed additional house building in Stonesfield, on the school and its ability to deliver a good standard of teaching and learning. Governors have carefully examined the impact on the school of increasing the numbers on roll at various levels of growth.</td>
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<td>Stonesfield primary school occupies a large open site, with a large playing field, in the middle of the village within the conservation area. The school transferred to its current site in 1991 and in the mid 1990s had a roll of around 100 pupils. The current roll at November 2016 is 138.</td>
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<td>The school hall was designed for 100 pupils and whole school assemblies are already difficult at 138 pupils. Similarly setting the hall out for lunch is already an issue with these numbers and school performances have to take place over several nights.</td>
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<td>The official projection is that the Charity Farm and Farley Lane housing developments, that are well underway, will produce approximately 20 new pupils. This will take the school to around 160 pupils and already cause difficulties particularly if the new students are not evenly distributed and the school has to restructure classes and possibly recruit another teacher.</td>
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<td>The Primary School Governors will let you know what problems further growth would bring for the School which should be addressed before additional houses are built.</td>
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<td>Thirdly the Community of Stonesfield wish to preserve the green belt in the area of natural beauty in which Stonesfield is located or at least mitigate the effect of building on it.</td>
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<td>When completing the Stonesfield Community Plan a high proportion of our present population said that their highest priority for the future of Stonesfield was to maintain the character of the village, the greenbelt around it and the area of natural beauty (AONB) in which Stonesfield is located.</td>
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<td>Information provided by West Oxfordshire District Council Planning Policy Department recognises that the proposed development off the Woodstock Road, even of the scale proposed in the local plan (50 homes),</td>
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would clearly have a degree of impact particularly for the people who lived on the edge of Stonesfield who will soon find they live nearer the middle even though they have not changed their residences.

This is not unexpected because the site lies in the green belt within the Cotswolds Area of Outstanding Natural Beauty.

Below left is a view from the back garden of a house in Woodstock Road and right is a view now taken from the same place in the same garden after housing development.

We were assured by the West Oxfordshire Planning Policy Team that as the site off the Woodstock Road was a sensitive site in a rural location they felt that the development of 50 homes on the whole 15.5 acres site would be the most appropriate to ensure sufficient landscape mitigation is delivered along with the new residential development.

No direct mention has been made in the Plan or by the likely developers of the opportunity to increase the extent of the open space (the village Playing Field) to the north of the site off the Woodstock Road.

West Oxfordshire Planners said that the rationale behind expanding recreation space provision is to balance the provision of housing within the village with other uses and ensure there is sufficient recreation provision to support the expanding population. CALA Homes the likely developers of the site off the Woodstock Road do not intend to do, or even consider, this.

It was also recognised by your Policy planning section that incorporating some recreation provision within the development site would help to soften the impact of the development on the wider landscape. This development off the Woodstock Road combined with the proposed North Farm development will land lock our present Playing Field and prevent future growth to meet the needs of the growing population. There is now a one off opportunity to address this.

Empire Homes would like to bring forward a mixed development of 15 houses on part of the land at North Farm. The remaining land on the site would be gifted to the Parish Council for an extension to the playing field. A public footpath would be provided through the site for access to the playing field land from this end of the village.

A site of 15 units triggers the current Affordable Housing policy and 50% affordable allocation would be sought. The developer Empire Homes, the Parish Council and the present owner of the site say that they will request that the gift to the Parish Council of the playing field land (potential development value £800k-£1m) should be allowed to mitigate the affordable housing policy in this instance.

We hope West Oxfordshire District Council Planners will accept this proposal for the development of the North Farm site for the reasons outlined above. See plans below.

I hope that you will consider the above. I am not against further house building in Stonesfield and welcome new people coming to live in the village in fact I have just written a "Welcome Pack" for them on behalf of the Parish Council which you can see on the Stonesfield website.

I do though think that more thought needs to be given to this type of mass housing development and that the community of Stonesfield should be given an opportunity to contribute to that thought after being properly and accurately informed which is not the case at the moment.
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<td>MM329</td>
<td></td>
<td>Ruth and Dennis Beasley</td>
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<td>eroded by the consent to build more and more housing. This latest proposal for 50+ houses north of Woodstock road will only serve to add to the congestion through our narrow streets. There seems to be ineffective planning with regard to access to the local preschools and primary school, safe pavements, cycle paths and secondary school capacity. Your plans will serve to destroy the natural environment surrounding this village.</td>
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<td>We do not find this response form is user-friendly nor suited to the task for residents of West Oxfordshire to comment on the plan.</td>
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<td>We consider the Proposed Modifications to the draft West Oxfordshire Local Plan are not sound, may not be legally compliant, and are not sustainable. There is no regard for the character and style of the historic and compact village of Stonesfield, within an Area of Outstanding Natural Beauty, nor for the needs of the community.</td>
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<td>The Plan shows a parcel of land allocated for a suggested 50 homes. (A planning application is imminent for just over half of this land for 68 homes, by CalaHomes. And the rest of the land? More houses later? What density?)</td>
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<td>Together with other houses currently under construction this would mean an increase of dwellings (currently some 700) within a small village by approximately 30% within five years. Such an increase is not sustainable. Where will it end?? The extension to existing built form is not ‘logical’, and Stonesfield is a village not ‘a town’, it has one small village shop. A survey of all villagers carried out in 2019 suggested that residents were in favour of infill sites only, not large-scale development.</td>
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<td>Building on green fields which surround the village with light, fresh air, and a multitude of wildlife is not ‘logical’ in the minds of the people who currently live in Stonesfield. The quality of life would be quantitatively changed by large-scale development of this type.</td>
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<td>a) All house types should meet the need of villagers - not be guessed at by developers, who favour larger dwellings for more profit and encourage people to move here from outside.</td>
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<td>What is ‘affordable’ housing? Has anyone asked the young people of the village, who would like to stay here, what they can afford? What about housing for elderly residents, who would also like to stay here?</td>
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<td>b) There are no designated cycle routes in Stonesfield at present - safety should be increased on the Woodstock Road, particularly with the envisaged increased traffic. A cycle/footpath between Stonesfield and the A44 should be provided (and a safe cycle path installed on the A44 to Woodstock, which offers the closest local amenities such as secondary school, banking, doctors’ surgery, shops).</td>
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<td>Many of the access roads to the west of the village are too narrow for two-way traffic. Double-decker</td>
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<td>MM510</td>
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<td>Tony and Helen</td>
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<td>Taylor</td>
<td>1255</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
<td>I wish to comment on the above Development Plan for additional housing in Stonesfield.</td>
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buses compete with carson these lanes. The access to the 84022 has two dangerously unsighted turns onto the road (one in the direction of Charlbury, one in the direction of Witney). Hundreds more cars make accidents more likely.

c) A tree-planted buffer zone should be provided between the bungalows to the west of the proposed development and noisy family accommodation moved away from the largely elderly existing residents.

d) How will the existing network of narrow winding village lanes be improved with the inevitable increased traffic - children taken to nursery schools, primary school etc.? There is no room for footpaths. Children already have to be accompanied to school by parents for reasons of safety. The roads to the school are narrow, single track in places, and there is no parking.

What does ‘appropriate contributions’ to infrastructure mean? Enlarged school and other amenities due to an increased population? Too vague. The villagers of Stonesfield have voted (c.2002) to have no street lights, this is a very dark village by choice.

e) The existing ‘public open space’ to the north is a playing field for football, cricket and tennis, where dogwalking is discouraged due to poor dog waste collection. An independent area on the proposed housing site of sufficient size should be provided.

- a link to the playing field to the north may not be legally possible.

We are strongly of the opinion that the people of West Oxfordshire should be properly informed about this process, and this has not happened. Stonesfield appears to be bearing a disproportionate amount of development in percentage terms, which would wholly change the character of the village.
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| MM512         |                         | Sarah and David Brown | -              | Brown             | 1257      | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190 | Comments on the Local Area Plan and its effect on Stonesfield

Whilst we all recognise the need for more housing I feel this should be balanced with the impact it will have on local communities and the provision of the required infrastructure yet neither seem to be adequately addressed in this plan.

The plan is very woolly and any flexibility seems to be tilted in favour of the developers in terms of being able to maximise housing numbers for profit and to WODC in securing their housing target.

They want affordable/social housing and I expect any objectors will be labelled NIMBY’s but we recognise the need and are reasonable and fair but do not want it “at any cost” to our community i.e. the Charity Farm development backing onto the private houses.

“Not at any cost to our community”.

- It is clear Stonesfield is in the wrong sub area i.e. Burford and Charlbury. Our service centres for doctors, dentists and schools are mainly in Woodstock, Long Hanborough, Eynsham and Witney.

The plan does not recognise the impact of new houses in these areas on the services people in Stonesfield use or the impact of increased housing in Stonesfield on those areas.

- The plan has vague guesstimates for housing numbers on sites earmarked for development i.e. Cala Homes on Woodstock Road earmarked for 50 homes on the whole site yet already rubber stamped for 68 homes on half the site in a “Gentleman’s agreement” with WODC planners prior to any application or consultation with the local community. This is an increase of almost 36% even though WODC has noted that a development of 50 houses would have a degree of impact.

The other half of the site is probably for future development be that long or short term for another 55 houses making 123 in total. An increase of 146% over the original number of 50 on this site.

Policy BCla states 50 houses on the whole of the Woodstock Road site but an e-mail from Cala Homes (attached) states the site was considered for 160 dwellings. Such discrepancies in what is supposed to be a strategic plan are appalling. This is just a single example and it would be naïve to think that this isn’t repeated throughout the plan.

- Also the plan is for sites with 11 or more houses to be 50% affordable/social houses yet they are not being provided as per the mix set out in the draft plan i.e.

5.61 - Clearly sets out the housing mix but both the Charity Farm and Cala sites do not provide the mix of houses proposed in the plan as there is no,

5.72 - Provision for the elderly, sheltered housing or smaller dwellings so people can downsize from family houses thereby freeing up larger properties is covered in the plan but our experience is that it does not seem to be demanded by WaDe.

5.79 - Provision for people with disabilities is covered in the plan but our experience is that it does not seem to be demanded by WaDe.
It seems the plan is flexible in the number of houses that can be built and we have the current or planned developments at,

Charity Farm - current 37 Houses,

Farley Lane - current 13 houses,

Woodstock Road 68 houses planned

North Farm -10-30 houses planned

There are 5 other houses either just finishing or planned in the village = 153

This represents 15.3% of the target for 1000 houses in the Burford Charlbury sub-area increase in village house numbers is 23.72%

Naturally if we only build houses or flats these will rightly be let to those most in need of housing which will be families with children. This places demands on services such as education i.e. the 16 affordable/social houses in the Charity Farm development has projected population of 61, if we take 2 adults per household this gives probably 29 children and the additional pressure on school places.

If Woodstock Road34 social houses follows this pattern then there could be as many as another 60 children.

This is without the children from the 55 private houses for which no population projection can be made but probably another 20 children.

This puts into perspective the numbers envisaged by the Stonesfield School Governors of 20 children per 50 houses.

As Woodstock, Long Hanborough and Combe schools are already under pressure, Stonesfield pre-school has only 17 places. This is not taking into account the situation at Marlborough Secondary School.

The provision of any infrastructure for Education is down to Oxford County Council yet they haven't published a plan to provide the additional classrooms, halls, playgrounds, teacher’s, kitchens etc. Whilst it is acknowledged that the actual need cannot easily be assessed there doesn’t seem to be the funds or a timescale for this provision. So where will our children go to school?

Probable future developments are, Woodstock Road- 55 in phase 2 Combe Road together with Charity Farm phase 2 possibly in excess of 96 houses (surveys being completed now). Witney welding site Farley Lane possible 10 houses = 161 = a total possible increase of 314 houses.

This represents 31.4% of the target for 1000 houses in the Burford Charlbury sub-area. Increase in village house numbers is 49%.

9.6.7 - The plan acknowledges that Stonesfield has already seen considerable consolidation of housing but it
seems we can take more, yet no provision is being made for the things we need to enable our village to grow without irreversible damage to our quality of life.

- Policy BCl states the timely provision of supporting infrastructure, education, leisure, green space and other community facilities but there is no timescale for this to be provided. If these developments go ahead then our playing fields will become landlocked with no future provision.

- The plan does not state that there should be green space or a buffer between existing developments and new developments which means the quality of life for some existing residents is sacrificed to the need for more housing, but there is space for everyone and no one needs to be disadvantaged by having their houses blighted and values dropped (see above photos). So whilst the plan is flexible for the developers and WODC it is not flexible enough to meet current or future local needs for communities and individuals in this respect.

- 5.41 - Charges - WODC plan to put the Cll at £100 per sq m, an average new 3 bed semi is 93sqm so a charge of £9300 will apply, this figure will also be applied on an Affordable Housing levy on sites of between 6-10 houses so another £9300 making £18600 on a new 3 bed semi on a small site, this is on top of £11500 stamp duty for a Charity Farm 3 bed semi at £430K, making a total of £30100 in taxes on a new home. If a site has more than 11 houses 50% are to be social houses and whilst the affordable levy goes these houses are built at cost and the profit the developer makes is solely from the private houses to be sold so this increases prices. Also if the site is big enough a section 106 levy is introduced circa £10000 per house. These costs can add as much as 10% to a new house.

- 5.38a - Affordable housing, it is mentioned that any discounted housing will be limited to 80% on properties valued at £450k in London and £250k elsewhere, yet average house prices in this areas are £330980 against a national average outside London of £214000 therefore housing costs in this area are well above the national average costs but this is not recognised in the plan and it does nothing to cut the extortionate cost of housing in the area or help people onto the property ladder.

- 9.6.7 - The plan acknowledges that Stonesfield has already seen considerable consolidation of housing and indeed there has been more social housing built in the village than private housing, i.e. 8 in Combe Road and 6-87 in the Ridings.

There are wider issues such as healthcare, transport and education,

- We only have one JR yet it is expected to cope with 10000's of thousands of new houses in Oxfordshire, doctors' appointments are averaging over 4 weeks, they are also closing the surgery in Witney and the maternity services in Banbury. Provision of healthcare does not seem to be adequately covered in the plan.

- 4.7 - Mentions the A40 and A44 and the congestion they have at peak times but with the additional housing in Stonesfield, Carterton, Witney, Eynsham, Woodstock and long Hanborough there is no plan for any increase in capacity apart from a park and ride and bus lane in Eynsham which will only serve those going to Oxford and not those who have to travel beyond and it is widely known that the A34 etc are not fit for purpose now and without the increase in demand that the additional housing will bring.

- Sewerage - the system cannot cope with existing demands the pump house over flows and the stench affects adjacent houses.
A plan with infrastructure lagging years behind the demand that these new developments will bring means that the quality of life for people already resident in the areas will be greatly reduced.

If there is no flexibility in the plan to meet local needs then it is prescriptive and therefore it is a poor plan. Therefore this plan is flawed.

There are also issues with the types of properties which are being built and the materials used in their construction. This is an AONB yet we are having houses built which do not fit in with what is already in the village.

Prior to 2016 and the Charity Farm development there were only 2 red brick and blue slate roof houses in Stonesfield and they were built in 1905, since then there has been a mix of properties but these have either been rendered or finished in Cotswold stone with either Stonesfield slate roofs, Cotswold tiles or grey concrete tiles.

This is Stonesfield the home of Stonesfield slate the quintessential Cotswold roof tiles and therefore Welsh blue slate tiles are alien to the area as are red brick houses. Further all of the houses are just little boxes and have no character and resemble the mass produced housing in Bicester, Banbury, Carterton and Witney. The character of our ancient villages is being ruined, everywhere will look the same, why?

More explanation on how WODC and OCC are going to address these issues is required.

We are writing with feedback on Policy BC1a - Land north of Woodstock Road, Stonesfield, (50 homes), contained within the West Oxfordshire draft local plan.

We wish to also express our growing concern at the additional developments being proposed in Stonesfield. In addition to the Policy BC1a proposal and the development of 70 houses by Pye already approved/underway at Charity Farm, we also understand additional housing development sites are being considered within the village at: land on Woodstock Road opposite the allocated land for BC1a (i.e. east of Charity Farm development), land on the Combe Road, further land/properties along the Ridings, and land at the bottom of Laughton Hill. Stonesfield seems to be being targeted for a disproportionate volume of development/housing in comparison to other surrounding villages and towns, such as Finstock, Charlbury and Woodstock, especially when these villages and towns havethe existing infrastructure/amenities to support further development - much more so than Stonesfield at present.

We are therefore urging the Council not to approve any further development in Stonesfield (including that contained within Policy BC1a) until an over-arching (but detailed) review of Stonesfield's (and the surrounding areas) housing needs, supporting infrastructure and local amenities have been thoroughly undertaken.

We feel that only then should development site opportunities in Stonesfield be invited and reviewed (together) as a master, over-arching proposal - not pockets of piecemeal development that is reviewed/approved on a case-by-case basis without a joined-up development plan for the village, and without the overarching large-scale funding required to improve the infrastructure and amenities being released to the village.

Our specific concerns regarding Policy BC1a, and other potential Stonesfield developments, include:

- No. of homes being proposed on Policy BC1a. Proposals is 50 but at a recent Parish Council Meeting CalaHomes reps said they already had permission for 68? This, in addition to the 70 homes already being built
at the Charity Farmsite, would mean an additional 138 homes in the village within the next 6-12 months. Where is the village infrastructure and amenities development plan (with funding) to support the development of 138 houses?

- Affordability of new homes. The existing/underway development of Charity Farm (70 homes by Pye), are currently being marketed (by Breckon & Breckon) at £420,000 for a 3 bedroom property and £850,000 for a 4 bedroom property! These are not affordable, accessible homes for Stonesfield/local residents, and this price range of houses will not help with our county’s/country’s housing crisis;

- Impact of Policy BC1a on Stonesfield’s Playing Fields, and the cricket/football clubs. The Stonesfield Playing Field Committee, along with the Stonesfield Sports and Social Club Committee, were hoping that some of the land at Policy BC1a could be purchased and used to extend the village’s playing fields to include an all-weather surface (so teams can train on an appropriate surface under floodlight all year round) and additional parking (to alleviate the parking congestion experienced at the Village Hall on Greenfield Road when training/games are underway). Stonesfield Strikers and Stonesfield Cricket Club are both popular, growing and successful sporting clubs, drawing in members/players from the surrounding villages and towns.

The proposed development (Policy BC1a) will have a detrimental impact on the clubs’ opportunity to expand and develop. Please, please take this into consideration when reviewing the proposal from CalaHomes - ideally the CalaHomes development would provide a new, alternative car park (with access to the playing fields) and an all-weather pitch site;

- Impact of additional housing/population on Stonesfield Pre-School (currently at capacity) and Stonesfield Primary School (with limited capacity). What funding will be available to fund Stonesfield Pre-School moving to a more appropriate site, so as it may extend to support the influx of children these developments will generate? And what additional funding will be provided to Stonesfield Primary School to increase the number of classes and staffing required?

- Impact of additional traffic going in, through and out of the village, particularly at peak commuter times. We have limited bus service in Stonesfield with no train line - the majority of those who work commute by car. Has the consequence of this, in terms of pollution, traffic etc. been reviewed/considered? How will safety on our small village roads be maintained?

- Impact of additional traffic at the already dangerous junction/crossroad between the B4437 and A44. Traffic already builds up and queues (from the direction of Stonesfield and Charlbury on the B4437) for at least 5-10 minutes on weekday mornings between 7.30-9am. Commuters then face further traffic through Woodstock, often coming to a standstill on the A44 at Yarnton, crawling in stop-start traffic all the way to Peartree Park & Ride and beyond. With further developments of more houses and further road-based commuters, the Duke of Marlborough/Judd’s Garage junction - which already has a very poor safety record, with recent fatalities - will only get busier and may require development, with traffic lights. Have WODC and OCC considered and budgeted for this?

- Impact on surrounding NHS facilities. Woodstock Drs Surgery is at capacity in an inappropriately small (and poor condition) building. Unfortunately plans to develop a new surgery in Woodstock have recently collapsed. Where will new Stonesfield residents be able to register? Are other local surgeries (such as Charlbury and Long Hanborough) able to take on and support the proposed increase in residents? Has this been considered and what are the findings?
• Impact on the local character, wildlife and Area of Outstanding Natural Beauty. Lastly, but not least, we are very fortunate to live in an Area of Outstanding Natural Beauty with many rare and endangered (even protected) plant and animal species in our midst. We hope that all developments will be reviewed from an ecological and environmental perspective, to ensure that habitats and species (as well as the general views of/from the village, and the feel of the village) are maintained.

We hope you can tell from the tone of this letter that we are not necessarily opposed to new homes being developed in Stonesfield - we understand that there is a housing shortage. However, the quantity, positioning and design of these new homes must be in keeping with the village, its infrastructure and amenities. And therefore, we are asking you to please take the above feedback in to serious consideration.

We hope that the Parish Council and the Planning Policy/Planning Permission teams will not be unduly pressured by housing developers and that local feedback will be upheld and supported. Please just say "no" to the individual developers (such as CalaHomes) until proper, thought-through, longer-term, over-arching plans for Stonesfield are in place. If we are to develop our villages to help meet housing needs, it is worth taking the time to do it properly. Otherwise, more long-term problems will be created (with no funds to resolve issues) than short term solutions provided. We must not simply go for the get rich (for landowners/developers) / quick fix solutions - we must think about the longer term impact for each every village/town.

We look forward to receiving your response to the feedback/questions raised in this letter.

Please can I register my strongest possible objection to your planning proposal for 50 new houses to Stonesfield and the expectation of a further 30 or 40 additional houses also to our village. Stonesfield is a small close knit community that has survived the riggers of the years because of its closeness and understanding to rural life and living. Most people who live in this small village share the values and aspirations that have maintained its existence and way of life.

I do not understand why our village has come onto the radar again for such an extraordinarily large development of houses. We are a very small population that cannot withstand such a disproportionate influx of new houses and people. Charlbury and Burford are far better suited to absorb this number of houses with their improved public transport links to larger towns and cities.

The character of this little village will be irreparably damaged should these proposals be allowed to be accepted.

An influx of 'new' non rural people would see our community under threat for example of no church bells for fear of disturbing unaccustomed 'ears'; a pressing 'need' for light pollution with proposals...
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<tr>
<td>MM750</td>
<td>Kemp and Kemp</td>
<td>Jon Waite</td>
<td>Mr</td>
<td>Waite</td>
<td>1832</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
<td>Please take this as confirmation that our client, the promoter of the Stonesfield allocation, supports this allocation under Main Mod Main 187 and assures the Council of its deliverability.</td>
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| MM753        | David Wilson Homes Southern | David Wilson | c/o Barton Willmore | 2044 | 2044 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190 | Burford - Charlbury Sub-Area  
As already stated, Policy H1 should be amended to omit reference to new housing at the rural service centres of Burford and Charlbury. As stated above, the Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 25% from 800 to 1,000 homes. Paragraph 115 refers to great weight and 116 of the NPPF clearly states that exceptional circumstances must be demonstrated to justify allowing major development in the AONB. This paragraph states that consideration of such applications should include an assessment of the need for the development and its impact on 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 and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area: however, that is not a reason to increase housing within the sub area. Given the deliverable opportunities to address housing need in those parts of the district outside of the AONB, recognising that there will still be 800 homes in the sub area, there have been no exceptional circumstances given for the inclusion of additional land within the AONB for development in the draft Local Plan. As a consequence, MM184 should be deleted as it refers to allocations at Burford, Charlbury, Shipton-under-Wychwood and Stonesfield, all within the AONB. The plan is not justified when considered against the reasonable alternative to development in the AONB and inconsistent with national policy. |
| MM752        | Bloombridge             | Bloombridge     | Mr               | Cutler            | 2045       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190 | Burford - Charlbury Sub-Area  
As already stated, Policy H1 should be amended to omit reference to new housing at the rural service centres of Burford and Charlbury. As stated above, the Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 25% from 800 to 1,000 homes. Paragraph 115 refers to great weight and 116 of the NPPF clearly states that exceptional circumstances must be demonstrated to justify allowing major development in the AONB. This paragraph states that consideration of such applications should include an assessment of the need for the development and |
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<td>MM73</td>
<td>Mike Cleaver</td>
<td>Mr Cleaver</td>
<td>208</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
<td>its impact on 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 and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area: however, that is not a reason to increase housing within the sub area. Given the deliverable opportunities to address housing need in those parts of the district outside of the AONB, recognising that there will still be 800 homes in the sub area, there have been no exceptional circumstances given for the inclusion of additional land within the AONB for development in the draft Local Plan. As a consequence, MM184 should be deleted as it refers to allocations at Burford, Charlbury, Shipton-under-Wychwood and Stonesfield, all within the AONB. The plan is not justified when considered against the reasonable alternative to development in the AONB and inconsistent with national policy.</td>
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<td>MM786</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs Jacobs</td>
<td>2209</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
<td>By no stretch of the imagination can Stonesfield be classified as a town! The stock phrase ‘well integrated and logical extension’ should not be applied here. The character of Stonesfield is of a typical Cotswold settlement on the edge of the Evenlode valley. Existing post-war development has already compromised the original village form on the eastern side. This proposal would further extend the developed area to the east and create a totally different character to the village. The visual impact as seen from the approach along the Woodstock Road would be very significantly detrimental. In my view it is nonsensical to suggest that a development would ‘achieve a positive improvement to this main eastern approach’ to the village. Surely the visual impact of the new housing at Charity Farm is already more than enough to swallow when approaching the village from the east? What sort of appropriate contribution to the infrastructure could the development proposals provide? A new school? The existing primary school is located in a densely built up area in the village and there are is almost no space for footpaths or parking in the vicinity. In addition the main road through the village is narrow with sharp bends and minimal forward visibility. With additional traffic these hazards would only increase the risk of accidents. Pedestrian and cycle facilities might well be easily provided within the development, but they would be of little value if links could not be extended into the village centre or towards the A44 and Woodstock. The 50 homes proposed is disproportionate to the size of Stonesfield, a village with a population of around 1500. Such an increase is not sustainable.</td>
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<td>Oxfordshire County Council</td>
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<td>Ecology and Natural Environment</td>
<td>In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species. The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary. Stonesfield – Land North of Woodstock Road</td>
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The site lies within the Cotswolds AONB. Development is likely to increase recreational pressures on nearby sites of high value wildlife. Further investment should be sought to help increase the resilience of these sites and the nearby North Evenlode Valleys Conservation Target Area.

If development proceeds there may be opportunities to provide a local natural green infrastructure resource to complement adjacent formal greenspace.

The consultation process is flawed as it contains inaccurate information:

Sections relating to Stonesfield indicate an intention to allow housing developments of around fifty houses on just one site to the North of Charity Farm. We understand that the developer has applied for sixty eight houses on approximately two thirds of the site and may have received an indication from the District Council that this and subsequent development of the remainder of the site would receive authorization. In total therefore, on a site identified as suitable for fifty houses in the consultation document, the District Council appears to be contemplating double that figure.

Within the village, potential total development is thought to be as high as two hundred homes, giving a range of fifty to two hundred houses. The District Council’s figures are the lowest in that range. The consultation document therefore fails to present an accurate picture of the position.

The proposals directly conflict with the Council’s strategic objectives:

The District Council has a policy in the course of development that states - Reducing the current reliance that is placed on the private car for journeys into, within and beyond the District by promoting opportunities for active travel through walking and cycling as well as encouraging the use of public transport;

There are no employment opportunities in Stonesfield that would reduce the need for travel from the existing population or any additional population. Thus additional housing of say one hundred houses has the potential to put an additional hundred cars and most likely double that figure, onto local roads.

The proposals for Stonesfield represent an unacceptable increase in housing, population and a commensurate additional pressure on the local infrastructure.

Together with the houses currently being built, we will see a 17% increase in housing in Stonesfield, from 644 to 752. I would note the following:

* There are no employment opportunities in the village, ensuring that everyone must commute. Although there is a bus route to Oxford, if your place of work is anywhere else it inevitably means using a car. How can
this be sustainable or meet emissions standards?
- Stonesfield has poorly maintained narrow country lanes, no main road or access to train.
- Water and sewage treatment facilities are already hard pressed.
- The primary school is already full, new classrooms will need to be built – where is the planning for this?
- The Oxford Times reported last week that smaller schools, like Stonesfield School face reductions in funding and Professor John Howson of Oxford University is reported as saying that a third of the counties primary schools face closure.
- The pre-school is already at maximum capacity.
- There's one village shop and the pub has just been closed.

In conclusion the proposals are not driven by local need and in fact directly work against the needs of local people. They demonstrate a failure to be concerned about the impact on local communities and a preference to prioritise what is vaguely described as ‘wider needs’.

Comment on the Proposed Modification

The Proposal is not sound because it does not meet the following:

- Positively prepared’ – i.e. based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. ‘Justified’ – i.e. the Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.

Stonesfield currently has 2 new housing projects in construction which will add 50 new houses, an increase of about 10% in the population. The new proposal of a further 50 houses will double that figure. There are no proposals to provide supporting transport services or community infrastructure and no appropriate provision has been made to safeguard the local environment.

Stonesfield has only a basic shop, the primary school cannot cope with the extra children and the only public house has recently closed. There are few employment opportunities and most people travel to work and secondary school by car or bus. Provision for pedestrians, cyclists and users of public transport is inadequate; much of the village has no footpaths, there are no cycle tracks and there is no street lighting. Existing secondary schools, doctors’ surgeries, and community facilities, all out of the village, are strained to breaking point. The sewer system is not adequate for the existing houses and required a private system for the last development.

Further development is likely to lead to pollution of watercourses unless additional infrastructure and major sewage improvements are made. Whilst there is no risk of flooding in Stonesfield, the additional surface water run-off into the Evenlode will increase the risk of flooding in areas downstream.

The proposed development is not of a proportionate and appropriate scale to its context, having regard to the potential cumulative impact of development in the locality.
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<td>MM171</td>
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<td>Miles Barrington-Ward</td>
<td>Mr</td>
<td>Barrington-Ward</td>
<td>368</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
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| MM172         |                         | Juliette Hillier | Mrs | Hillier | 369 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | The Proposal is not sound because it does not meet the following:  
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<td>MM173</td>
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<td>Ian Binnian</td>
<td>Mr Binnian</td>
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| MM174         |                         | Cheryl Miller   | Mrs              | Miller            | 371        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190 | Comment on the Proposed Modification  
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| MM175         |                         | Caroline Friend | Mrs              | Friend           | 372        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190 | Comment on the Proposed Modification  
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<td>MM176</td>
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<td>Nick Hooper</td>
<td>Mr Hooper</td>
<td>373</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
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<td>Judith Hooper</td>
<td>Mrs Hooper</td>
<td>374</td>
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<td>MM178</td>
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<td>Deborah Barrington-Ward</td>
<td>Mrs Barrington-Ward</td>
<td>375</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
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<td>MM179</td>
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<td>Rebecca Johnson</td>
<td>- Johnson</td>
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<td>Simon Warr</td>
<td>Mr</td>
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<td>Eleanor Bailey</td>
<td>Mrs</td>
<td>Bailey</td>
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<td>MM182</td>
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<td>David Stevenson</td>
<td>Mr Stevenson</td>
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<td>Sub Area &gt; MAIN 190</td>
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<td>Mr and Mrs Martin</td>
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<td>Mary and David Casey</td>
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<td>382</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
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<td>Roger Cullen</td>
<td>Mr Cullen</td>
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<td>Lines</td>
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<td>Saville</td>
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<td>Mr and Mrs</td>
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Further development is likely to lead to pollution of watercourses unless additional infrastructure and major sewage improvements are made.  
Whilst there is no risk of flooding in Stonesfield, the additional surface water run-off into the Evenlode will increase the risk of flooding in areas downstream.  
The proposed development is not of a proportionate and appropriate scale to its context, having regard to the potential cumulative impact of development in the locality. |
| MM202        |                         | Simon Powell   | Mr               | Powell            | 401        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190 | Comment on the Proposed Modification  
The Proposal is not sound because it does not meet the following:  
‘Positively prepared’ – i.e. based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. ‘Justified’ – i.e. the Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.  
Stonesfield currently has 2 new housing projects in construction which will add 50 new houses, an increase of about 10% in the population. The new proposal of a further 50 houses will double that figure.  
There are no proposals to provide supporting transport services or community infrastructure and no appropriate provision has been made to safeguard the local environment.  
Stonesfield has only a basic shop, the primary school cannot cope with the extra children and the only public house has recently closed. There are few employment opportunities and most people travel to work and secondary school by car or bus. Provision for pedestrians, cyclists and users of public transport is inadequate; much of the village has no footpaths, there are no cycle tracks and there is no street lighting.  
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<td>MM203</td>
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<td>Nicky Holland</td>
<td>Mrs</td>
<td>Holland</td>
<td>402</td>
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<td>MM204</td>
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<td>Kerry Burniston</td>
<td>Mrs</td>
<td>Burniston</td>
<td>403</td>
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<td>MM205</td>
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<td>Claire Brooks</td>
<td>Mrs</td>
<td>Brooks</td>
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<td>Marina Hodge</td>
<td>Mrs</td>
<td>Hodge</td>
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<td>Rachel and Jim Naylon</td>
<td>Mr and Mrs Naylon 436</td>
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<td>We write, as residents, to express our concern regarding the nature and volume of proposed development at Stonesfield. We feel that the number of new housing units would create a disproportionate increase in size of the village - a village which would be changed irrevocably as it simply does not have the infrastructure to accommodate such development. We were informed, relatively recently, that the two sites currently being developed, Charity Farm and Farley Lane, would be sufficient to meet the 'target' for housing provision and no further building would need to take place! We trust that the council pays heed to the concerns and apprehensions of many existing residents of Stonesfield.</td>
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<td>Jim Astle</td>
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|               |                        | I am a solicitor in professional practice in Oxford. I have been engaged in the practice of Town & Country planning law since 1975. Since 1980 I have acted for and against local planning authorities in Oxfordshire and neighbouring counties. I sit in a number of part-time judicial capacities. These representations, however, are made entirely in my personal capacity as a resident of Stonesfield. They relate to the proposed allocation within the West Oxfordshire Local Plan (“the Local Plan”) of a site for development which it is proposed will include “50 homes.” The requirement to consult generally. When the Localism Act 2011 (the “Localism Act”) was introduced by the then Secretary of State, Eric Pickles, in 2010 its purpose was said to be to devolve decision-making power from central government to individuals and communities. It was claimed that this philosophy would also permeate changes made by the government to planning legislation. The clue to what was really meant by “localism” is in the nearest thing to a requirement for consultation within the Localism Act. This is in section 81 which requires a “relevant authority,” i.e. county council, district council etc., to consider an “expression of interest” in accordance with the legislation. An “expression of interest” is defined as “an expression of interest in providing or assisting in...
providing relevant service on behalf of the authority.” The philosophy is not truly about individuals and communities but about privatisation and who gets the goodies. There are requirements for public consultation within the Local Plan preparation approval process, but there is no sign within the current implementation of that process in West Oxfordshire of any semblance of that purported philosophy, i.e. consulting individuals and communities, being carried into effect. It is rather more about the private exploitation of public good, i.e. land in an area of outstanding natural beauty.

The various stages of the plan preparation process are set out in the Planning and Compulsory Purchase Act 2004 (“the Act”), as amended by the Localism Act 2011, and purport to include provisions for so-called “community involvement.” Section 6 purports to relate to community involvement in regional spatial strategies. Section 18 requires a local planning authority to prepare a “statement of community involvement.” Section 19 (3) says that in preparing the various local development documents the local planning authority must comply with a statement of community involvement, but permits a local planning authority to sidestep this requirement in that it does not apply at any time before the authority has adopted its statement of community involvement.

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Local Plan Regulations”) requires a local planning authority (the “LPA”) to notify specified bodies or persons and invite each of them to make representations to the LPA about what a local plan ought to contain. The specified bodies or persons include parish councils and “such residents or other persons carrying on business in the LPA’s area from which the LPA considers it appropriate to invite representations.” (My italics). It is academically interesting to note that there is no statutory duty directly to consult the general local population, whose views might be inconvenient to local planning authorities and/or to vested interests, but nonetheless there is some requirement to consult. It depends for its efficacy in the context of the allocation of land in a local plan in large part upon the good faith, energy and efficiency of the members of the parish councils. Some might say that is an optimistic, not say dangerous, dependency.

Consultation in Stonesfield in this Local Plan preparation and approval process.

I am a resident of Stonesfield. I have been so for 38 years. I might, were I naive, expect to have taken into account my views and those of other residents of Stonesfield in the derivation of those parts of the “local development scheme” under section 15 of the Act and or its constituent documents which closely affect me and my neighbours. I am not surprised however, because I am far from naive, that neither I nor my neighbours have in the slightest degree been consulted and consequently our views have not been and will not be taken into account. My lack of naivete leads me to believe that even were we to have been consulted our views would have been ignored. However, I take modest comfort in the knowledge that the lack of even the nominal, statutorily required consultation may give rise to a right to judicial review of the process pursuant to section 113 of the Act, of which I and my neighbours may be able to avail ourselves.

My understanding is that the process of independent examination of the West Oxfordshire District Council (the “WODC”) local development plan documents (“the Local Plan”) in accordance with section 20 of the Act has been suspended because the inspector was dissatisfied inter alia with the housing requirement of the WODC within the Local Plan. He said “the housing requirement in the submitted local plan of 10,500 dwellings is not justified and has not been derived from a process which complies with the requirements of the NPPF.” The NPPF is of course the National Planning Policy Framework. By virtue of section 19 of the Act in preparing a local development document the LPA must have regard to various matters including national planning policies and advice by the Secretary of State and the Regional Spatial Strategy (the “RSS”) for the region in which the LPA is situated.
In short, notwithstanding the hollow claims of those who introduced the Localism Act, the “independent” inspector has expressed the view that the WODC did not provide for enough houses to meet WODC’s share of the housing targets set out in the “superior” planning documents, largely determined by national government rather than the residents of communities which will be affected by local plans. The WODC was told to jolly well think again and has rolled over. Rather than resolutely arguing its case before the inspector as one might have expected it to do, having commissioned at public expense expert consultants’ reports which presumably it initially considered to support its stance, the WODC now supinely proposes within its revised documents to provide for 15,950 dwellings rather than the 10,500 dwellings it had previously proposed. A consequence of this massive increase in its target has been the allocation of 15 new sites.

One of those is “Land north of Woodstock Road, Stonesfield (50 homes)” (the “Stonesfield Site”). I am told however that at a meeting on Friday 9th December 2016 (the “9th December meeting”) with members of Stonesfield Parish Council, Catherine Teplow, WODC development control officer, made, if what I am told is true, the staggering acknowledgement that this was a mistake by WODC and the reference to 50 homes should have been 50-70 homes. I did not learn of the allocation proposal through any process of local “consultation” but rather by virtue of items in our community newspaper “the Stonesfield Slate.” I read items about it in the Slate in mid-December 2016. It was not until later in December 2016 that there appeared on the village website a “Press Release – Local Plan” of Stonesfield Parish Council dated December 13, 2016.

These were the first intimations most local people had of the process of consultation which the “Press Release” indicated had begun over a month earlier on Friday 11 November. The Press Release further indicated that the Parish Council was “recommending that any village organisation or individual, which has concerns over the plan, voice them through the consultation process described below.” The Press Release went on to indicate that the consultation ended on 23 December 2016. In effect local residents were given less than 10 days to inform themselves and make comments.

I do not know when the Stonesfield Parish Council was given details of the revised Local Plan proposals, but, whether or not its members failed in their duty to inform their constituents, the fact remains that their constituents were not informed before it became impossible for the overwhelming majority to make worthwhile representations. I am aware, as a resident of Stonesfield in touch with many other residents of Stonesfield, that few if any, except no doubt those landowners who stand to make a great deal of money out of the process, were aware of the proposal until the Slate items. I am told by another local resident, whom I assess as a reliable source, that a prominent member of the Parish Council when asked by my informant following the Slate items, about the proposal responded “Oh, it’s got out has it?” I treat such information with caution, but if it truly reflects the attitude of the Parish Council to its functions in a case of this sort our democratic system requires radical overhaul. Whatever the truth of it, the process of consultation has been nugatory for the residents of Stonesfield. Had it been otherwise, I have no doubt at least one public meeting attended by representatives of the huge majority of the population of the village would have taken place and robust expressions of opinion against the present proposal would have been forthcoming.

Representations on the merits.

Such representations as I shall now make are subject therefore to the qualification that, because of a lamentable lack of consultation and notice of the proposed modifications to the Local Plan which has resulted in severe pressure of time, I have been quite unable to research and consider the matter sufficiently thoroughly and therefore I reserve my right through whatever remedy is open to me, including judicial review of the process, to make further and more thorough submissions in due course. For the moment however:
The “Overall Strategy” of the Local Plan pays lip service to the statutory purpose of achieving sustainable development set out in paragraphs 6 and 7 of the NPPF. Paragraph 7 refers to the “three dimensions to sustainable development: economic, social and environmental” and says that these dimensions give rise to “the need for the planning system to perform a number of roles” including a “social role” a major element of which is “providing the supply of housing required with accessible local services that reflect the community’s needs and support its health, social and cultural well-being.” (My italics).

The Overall Strategy then recites the necessary ingredients of sustainable development, the first of which is “Locating Development in the Right Places to ensure good access to facilities, help reduce car use, protect important areas such as Green Belt and AONB, conserve and enhance the natural and historic environment…” The AONB is of course the Area of Outstanding Natural Beauty.

In accordance with the strategy of locating development in the right places to ensure good access to facilities, help reduce car use etc., the pre-modification version of the Local Plan said at 4.18: – “Outside of (sic) the three main towns of Witney, Carterton and Chipping Norton, the focus of development will be the six rural service centres of Bampton, Burford, Charlbury, Eynsham, Long Hanborough and Woodstock. These contain a good range of services and facilities and are considered to be suitable for accommodating development of an appropriate scale and type that would help to reinforce their existing service centre roles and meet their development needs and those of their immediate hinterlands.” (My italics).

In the modified version of the Local Plan this paragraph has been deleted. Its deletion is in conflict with the Overall Strategy Requirement “to ensure good access to facilities, help reduce car use etc.” It was presumably with a view to achieving this objective that the “good range of services and facilities” of the “six rural service centres” was in the pre-modification version of the Local Plan considered to be important. They had the range of services and facilities to accommodate “development of an appropriate scale and type.” Stonesfield emphatically does not. They were arguably settlements with the services and facilities to support sustainable development. Stonesfield emphatically is not such a settlement:–

The “six rural service centres” are all endowed with good transport links by frequent bus and/or railway services (Charlbury and Long Hanborough),

Stonesfield has no railway station and a comparatively poor bus service.

The “six rural service centres” all have fast-food outlets, public houses, cafes and restaurants, supermarkets and so on.

Stonesfield has a single shop, a hairdresser, no fast food outlet, a single moribund public house (the umpteenth manager has just resigned), no cafe, no restaurant, no supermarket;

Each of the “six rural service centres” has a medical practice.

Stonesfield has no medical practice.

Four of the “six rural service centres” have a secondary school.

Stonesfield has no secondary school.

Stonesfield village school is already near or at capacity and would have no scope to accommodate additional pupils. Having previously been Chair of the PTA and a Governor of that school for more than 20 years, for a large proportion of that time as Chair, I am well aware of the virtual impossibility of squeezing necessary resources out of the local education authority and the central government Department for
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<td>* Stonesfield’s pre-school is similarly over-subscribed.</td>
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<td>* There are few employment opportunities within Stonesfield.</td>
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<td>* Sources of employment within all the “six rural service centres” are very substantially more numerous e.g. there is a substantial business estate in Long Hanborough and many shops, restaurants, public houses, hotels, a supermarket providing employment in Woodstock, not to mention Blenheim.</td>
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<td>* The “six rural service centres” are in the main well-equipped with recreational facilities, e.g. Woodstock’s swimming pool, football ground and tennis club; Charlbury’s cricket ground, football pitch, tennis courts &amp; bowls club.</td>
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<td>* The single Stonesfield village recreation ground is already subject to pressure which has resulted in the recent adoption of a contentious proposal to deprive the tennis club of one of its three courts in order to accommodate demand for space for playing football.</td>
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<td>* The central core of the village of Stonesfield is now intensively developed, large back gardens and small open spaces having become sites for small-scale housing developments. The old centre is comprised of narrow streets. What services there are, in effect the shop, hairdresser, the school, the church and the moribund public house have little or no parking. There are few pavements in the central core.</td>
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<td>* “50 homes” will create significant additional car traffic within and outside the village. There is already a dangerous concentration of cars, parents and young children around the centre of the village at school starting and leaving time. Sooner or later a child may be killed or seriously injured. The village, unsurprisingly, simply was not built to cope with the traffic consequences of a development of the scale proposed. Outward access to each and every one of the services and facilities mentioned above which are lacking within the village will in the overwhelming majority of cases be by car traffic, given the poverty of the public service transport provision to the village. This will result in a substantial increase in car traffic between the village and neighbouring service centres.</td>
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<td>* In short none of the facilities suitable for accommodating development of the scale of “50 homes” or, allowing for the “mistake” of WODC, 50-70 homes and perhaps in the future (see later) if the dominoes begin to fall, many more. There is no room within the village to provide such facilities and there is no likelihood of them being provided on a development site outside the village envelope, and indeed it would be inappropriate to provide them on such a site within the AONB.</td>
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<td>* It is helpful to remind oneself of the history and significance of the concept of an Area of Outstanding Natural Beauty:-</td>
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<td>* It has a shared history and significance with National Parks. Both were creatures of the post-war alignment of public good and private interest which gave rise to, inter alia, free education, the National Health Service etc. all of which today is anathema to the ruling regime.</td>
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<td>* Reports to the post-war government by John Dower, a civil servant, and Sir Arthur Hobhouse, a prominent politician, made proposals to facilitate the preservation of places of natural landscape beauty for the enjoyment of the public (not just the rich and powerful). Dower proposed the designation of smaller and less wild but nonetheless especially beautiful landscapes as Areas of Outstanding Natural Beauty rather than as National Parks.</td>
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<td>* The reports of Dower and Hobhouse gave rise to the National Parks and Access to the Countryside Act 1949 (“the 1949 Act”). The 1949 Act required the designation of both National Parks and AONBs. The legislative provisions relating to AONBs were replaced by and substantially carried forward into the Countryside and Rights of Way Act 2000 (the “2000 Act”).</td>
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* By section 85 of the 2000 Act a district council, i.e. including WODC, has a statutory duty to “in exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, ….. have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”

* In paragraph 115 of the NPPF the government in March 2012 accorded AONBs equal status with National Parks in making planning decisions affecting the beauty of landscapes. It said: “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.”

* There are 33 AONBs in England and the Cotswolds AONB, within which Stonesfield is situated, is the largest. Its significance is reflected in the fact that it is one of only two AONB’s which has its own statutory “Conservation Board.” The Secretary of State for the Environment has a power under section 86 of the 2000 Act to create a Conservation Board for an AONB. The first Conservation Boards in England were established for the Chilterns and Cotswolds AONBs in December 2004. Government guidance is to the effect that a Conservation Board is considered to be of most potential benefit to the larger AONBs whose area crosses a number of administrative boundaries. There is no doubt this was in the fond hope that the establishment of a Conservation Board would militate against precisely the abuse of an AONB by constituent local planning authorities of the kind currently proposed by WODC in Stonesfield.

* The law, i.e. section 87 (1) of the 2000 Act, provides that a Conservation Board must have regard to two purposes in exercising its functions. One purpose is the conservation and enhancement of the natural beauty of the AONB. The other is to increase the understanding and enjoyment by the public of the AONB’s special qualities. It is interesting in the current context to note that (a) there seems to be little understanding by WODC of the first purpose and (b) section 87 (1) says that if it appears to a Board that there is a conflict between the two purposes, it is to attach greater weight to conserving and enhancing the AONB, i.e. conservation and enhancement of the natural beauty of the AONB take priority over the understanding and enjoyment of the public of the AONB’s special qualities. The natural beauty is of supreme importance.

* The government guidance goes on to repeat the government’s commitment to the principles of sustainable development and requires the Boards to work towards matching the principles of sustainable development with their purposes. Again therefore there is an emphasis, albeit this time implied, upon “Locating Development in the Right Places.” It is not conducive to the conservation and enhancement of an AONB to locate a major development site for 50-70 houses outside the village envelope of a settlement with few services or facilities and poor public transport.

* This is therefore not simply a question of a blue or grey wash on a plan with an airy fairy notion about pretty landscapes, which may be used when it suits the local planning authority and jettisoned when it does not. WODC has a legal duty to place very significant weight upon the designation. The situation of Stonesfield within the AONB is a material consideration of very great significance in the formulation of the Local Plan.

* Policy EH1 of the Local Plan sets out what will be the significance of the AONB in considering planning applications under the Local Plan. It says: –

“The quality, character and distinctiveness of West Oxfordshire’s natural environment, including the landscape, cultural and historic value, tranquillity, geology, countryside and biodiversity, will be conserved and enhanced……. When determining development proposals within or impacting upon the Cotswold Area of Outstanding Natural Beauty, great weight will be given to the conservation of the area’s landscape and scenic beauty. Special attention protection will be given to landscape and biodiversity of the…… Wychwood Project Area.”
It should be noted that Stonesfield is not only within the AONB, but also within the Wychwood Project Area.

* The text within the Local Plan supporting policy EH1 is clear. At 8.4 the stringency of the policy is emphasised: –

"In accordance with national policy, major developments within the AONB will only be permitted in exceptional circumstances and where it can be demonstrated that they are in the public interest. Importantly, there is no singular definition of major development and the Council will consider each case on its merits having regard to the relevant factors including location, scale, context and design. In some instances, even relatively small-scale developments will be classed as major development and therefore only permitted in exceptional circumstances and where they can be demonstrated to be in the public interest."

* However, whereas this policy weighs heavily against the kind of major development now suggested at the Stonesfield Site and the Overall Strategy of the Local Plan observes the ritual of acknowledging the significance of the protection of "important areas such as . . . . . AONB," the allocation of the Stonesfield Site for housing development of the scale envisaged is in stark conflict with the very notion of protection of the The Stonesfield Site is entirely within the Area of Outstanding Natural Beauty and is outside the village envelope.

* The WODC justification at 9.6.34b-i of the modified Local Plan for the allocation of the Stonesfield Site, notwithstanding the conflict with the relevant Local Plan policies is pure sophistry: –

* "whilst the development of the scale proposed (50 homes) on an edge of settlement site such as this would clearly have a degree of impact.....” This would be a massive development in proportion to the size of the existing village, would be situated on the main approach to the village and would completely alter the perspective of the village when viewed from the south and from the east. Its visual impact in and on the AONB would be catastrophic. I have dealt with its impact upon the central core of the village and upon the meagre services and facilities within the village above. That does not need to be repeated. This would be the single biggest development ever permitted at the village.

* "The site is not affected by any.... Policy constraints other than the fact that it lies within the Cotswolds Area of Outstanding Natural Beauty.” If this were not serious it would be laughable. The significance of the AONB policy has been dealt with above and again does not require repetition.

* "In terms of the need for the development, the provision of 50 new homes on this site would make a significant contribution towards meeting identified housing needs in West Oxfordshire. There would also be some benefit to the local economy during the construction phase. The NPPF requires planning permission for major developments on land within an AONB to be refused “except in exceptional circumstances and where it can be demonstrated they are in the public interest.” There are no exceptional circumstances here other than any difficulty WODC may have in meeting its housing target. To justify the allocation, not only where there are no exceptional circumstances, but where there is a stark absence of adequate services and facilities necessary for the “sustainability” of such a large-scale development, WODC would have to show that it could not meet that target otherwise than by the inclusion of the Stonesfield Site. It has produced no evidence to that effect.

* "In terms of the scope for developing elsewhere, the Burford – Charlbury sub-area is washed over by a significant proportion of AONB designation. This in itself means that to meet future housing requirements, some development within the AONB will be necessary.” The WODC has not shown that a suitable site for 50 homes cannot be found in any part of the Local Plan area outside the Burford – Charlbury sub-area, where there might be no conflict with AONB policy and/or where a suitable range of facilities and services is available and where development would not have the consequence of a major increase in car use which
would be associated with the Stonesfield Site, e.g. in particular the “rural service centres” at Woodstock, Long Hanborough, Eynsham and Bampton or indeed in or around Witney itself. Even were it to be the case that the identification of such a site was impossible, the WODC has not produced evidence that no other site of a similar size can be identified within the Burford – Charlbury sub-area where there might be no conflict with AONB policy and/or where a suitable range of facilities and services is available etc. In particular it has not produced evidence that no such site would be available in the two “rural service centres” within the sub-area, i.e. Charlbury and Burford. Both these centres are acknowledged by the WODC itself to have a range of services and facilities far more appropriate to a development of this scale than has Stonesfield.

* Until recently I have been accustomed to acting for clients refused permission for single house development on sites outside settlement envelopes on the ground that such proposals were in the AONB and would not be conducive to the conservation and enhancement of its natural beauty. The WODC would now have us accept that the allocation of a site for a large-scale development of tedious suburban houses, including no doubt the minimum proportion of truly affordable housing the developers can get away with, is appropriate. What has changed?

* The change is of course the political impetus to satisfy increased housing development targets laid down ultimately in the NPPF and the RSS. One might argue about the manner in which such targets might be achieved, i.e. predominantly through unregulated market ventures giving rise to opportunities for disproportionate profit to developers and landowners, or more significantly through local authority increases in the public housing stock, but it is more difficult to argue about the severity of housing shortage. Accepting that central government has laid down housing targets, the question is whether they should be fulfilled in gross non-compliance with long accepted planning policy or indeed non-compliance with apparent planning policy or whether they should be fulfilled in compliance with that policy.

* The WODC in publishing its pre-modification Local Plan argued that its appropriate share of the overall housing target was at a level the Inspector later considered inadequate. The WODC does not appear to have made any further argument in support of its original position but has accepted the need to provide a number of houses over 50% more than its original target, a staggering increase. The consequence appears to have been an abandonment of the need to select suitable sites in accordance with the policies remaining within the Local Plan. In short politics has taken over and planning policy has gone out with the bathwater. In panic at the inspector’s view of the implications of the politically imposed overall housing targets, the WODC has taken what it sees as the politically and practically easiest action in response. It has looked at places where landowners, unconcerned with nationally accredited planning policies of supreme significance, are prepared easily to make land available for a fast and handsome buck and indiscriminately included such land as an allocation within the modified Local Plan, without any regard to planning policy and has attempted to justify this disregard by vacuous sophistry.

* The solution to the dilemma of the WODC in meeting its target should not be a panic abandonment of both compliance with planning policy of unique national significance, i.e. AONB and sustainable development policies, and of sensible local policy that development of the scale envisaged should be situated in close proximity to an appropriate range of facilities and services, but rather the institution of a rigorous search for and examination of sites in parts of the WODC area where these policy conflicts are not inevitable or extreme to the degree that they are at the Stonesfield Site.

* An indication that much more suitable sites elsewhere are likely to be available is derived from a comparison between the percentage of existing housing stock comprised by development currently underway and development proposed within the Local Plan in other settlements within the Burford-Charlbury sub-area and that percentage in Stonesfield. The following analysis has been prepared at short
notice by a fellow resident of Stonesfield and is arrived at by taking the last census figures for the population of each settlement, dividing the population totals by 2.3, being the average number of people per house according to the 2011 census, to arrive at the approximate existing housing stock and then determining the proportion of that existing housing stock comprised by development currently underway and development proposed within the Local Plan:

- Charlbury 6.71%
- Kingham 6.55%
- Burford 6.72%
- Shipton 8.13%
- Milton 8.65%
- Stonesfield 15% + (including developments under construction currently at Charity Farm (37) and Farley Lane (13) plus the Stonesfield Site).

The figures above are based upon the following spreadsheet:

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Population</th>
<th>Houses</th>
<th>Current Commitments</th>
<th>Local Plan Proposals</th>
<th>Proposed Total Commitments</th>
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</thead>
<tbody>
<tr>
<td>Stonesfield</td>
<td>1527</td>
<td>664</td>
<td>50</td>
<td>50</td>
<td>100</td>
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<tr>
<td>Charlbury</td>
<td>2984</td>
<td>1297</td>
<td>47</td>
<td>40</td>
<td>87</td>
</tr>
<tr>
<td>Kingham</td>
<td>913</td>
<td>397</td>
<td>26</td>
<td>0</td>
<td>26</td>
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<tr>
<td>Burford</td>
<td>3250</td>
<td>1413</td>
<td>10</td>
<td>85</td>
<td>95</td>
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<tr>
<td>Milton</td>
<td>1648</td>
<td>717</td>
<td>62</td>
<td>0</td>
<td>62</td>
</tr>
<tr>
<td>Shipton</td>
<td>1244</td>
<td>541</td>
<td>0</td>
<td>44</td>
<td>44</td>
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* This shows that:-
  * far from resisting development nimby fashion, Stonesfield, even without bringing into account the Stonesfield Site, will already have achieved growth of 7.53% i.e. more than three of the other five settlements;
  * Stonesfield, notwithstanding its gross unsuitability for sustainable development through lack of facilities and services, has already shouldered a disproportionate burden of housing development;
  * given what Stonesfield has already achieved, there are likely to be sites in other settlements far more suitable for sustainable development if WODC can only be bothered to do the hard work to identify them.

I have seen the report and complaint submitted to you by Mr. Lawrence and wish to add my name to it. A consultation which does not present the facts, whether by omission or by error, is not a fair and honest consultation. The residents of Stonesfield need to have the opportunity to comment on the council’s plan with the benefit of the fullest possible information available. I ask you to provide an extension to the
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<th>Respondent ID</th>
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<tr>
<td>MM247</td>
<td></td>
<td>Judy Anders</td>
<td>-</td>
<td>Anders</td>
<td>455</td>
<td>&gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
<td>As a villager living in Stonesfield, apologies for being unable to follow all of the legal requirements to complete this form, but I do not believe this should exclude me from objecting to the new and additional housing application for possibly 50 to even 200 new houses in Stonesfield. We live in a small village with circa 1500 residents and the new housing suggestions would completely change the character of the village. I did not object to the current building of 50 houses as we were advised if we agreed to the proposal Stonesfield would be left free of development for years to come. As we are currently having 50 houses built in our little village of Stonesfield with circa 1500 residents, and I do understand the need for housing I object to the application for a further 50 houses in our village. As I said we were advised if we did not object for the current housing, Stonesfield should be ‘safe’ for years. The reasons for this are: * We live in a village full of character and the possibility of a further 50 houses in addition to the current 50 being built would have serious impact on the nature of the village. * The amount of new housing proposed is disproportionate to the size of the village. * The school is already full and would not have space for all the extra children needed local education. * The roads in and out of Stonesfield are already busy considering the size of the village. * The plans are to build on yet more green space - there seems to be little focus on trying to use brownfield sites. * We are ruining our ‘green and pleasant’ land with endless development. * Many people use Cotswold villages as their country escape in addition to their other residence - what’s to stop these houses to be used for this purpose too? * We have few amenities in Stonesfield so the extra housing will create even more traffic going on the A44 or via Long Hanborough.</td>
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<td>MM301</td>
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<td>Paul Bates</td>
<td>Mr</td>
<td>Bates</td>
<td>517</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
<td>In the latest SHELAA for site 363 in Stonesfield the conclusion is the site is 'not suitable'. This is, in my view, totally correct. However there is one area you might wish to modify, which further reinforces your conclusion. Under Physical Constraints it says &quot;The site is not affected by any public rights of way (PROW). No TPOs or significant trees affect the site. Ground conditions appear good with no evidence or record of land instability, contamination or pollution. There are no other obvious physical constraints to development in this location.” I am not sure if you are aware that in - the fields above this field there are a number of natural springs that drain into the field. - a normal winter this field has is covered with standing water. - periods of continued heavy rain there has been up to 3 feet of water. I would have thought these were physical constraints? I wish you every success in getting this local plan approved.</td>
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<td>MM304</td>
<td></td>
<td>Mr P Hughes</td>
<td>Mr</td>
<td>Hughes</td>
<td>525</td>
<td>&gt; SECTION 9 - STRATEGY</td>
<td>I am concerned about the proposed allocation of 50 new houses on land north of Woodstock Road in Stonesfield (listed under Non-Strategic housing allocations in the Local Plan exhibition). The developer, Cala</td>
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| MM320         |                         | Rob Atkinson, Mr Atkinson | 589        | AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190  | AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190  
Homes, have now increased the proposal to 68 houses on a site of just over 8 acres. It would be directly opposite the new Charity Farm development (35 houses) on the other side of Woodstock Road, with resulting traffic congestion. Little account has been taken of the restricted roads in Stonesfield, on which the increased traffic will undoubtedly endanger pedestrians. Stonesfield is also being allocated, pro rata, more than its share of new building, given that 20 new houses are already being built on Farley Lane (Empire Homes) and another 15 are proposed for the North Farm site close by. |
| MM329         |                         | Ruth and Dennis Beasley, Beasley | 607        | AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190  > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190  | We write to object in the strongest possible terms with regard to the proposed housing developments in Stonesfield.  
In relation to Item BC1a on page 292 of the 'Submission Draft Including Proposed Modifications' document, we wish to make the following points:  
* The failure by West Oxfordshire District Council to get a Local Plan approved has left Stonesfield vulnerable to being ruined by over-development. Maybe this was a deliberate strategy by the Council, to leave the way clear for indiscriminate development, thus helping the Council to achieve its target of new housing.  
* The absence of a local plan means that the proposed over-development would put an intolerable burden on local infrastructure including roads, drainage, sewage, schools (both primary and secondary), public transport, shops and health care. The local doctors' surgeries are already stretched beyond their natural capacity, without the means to expand.  
* Contrary to statements made in the Submission Draft concerning developments to the north of Woodstock Road, we fail to see how this development would be a 'logical extension of the existing built form of the town.' (See comment below regarding the fact that Stonesfield is not a 'town'). We are also unable to see how this development would achieve 'a positive improvement to the main eastern approach into Stonesfield'. No such development or 'improvement' is necessary.  
* The plan refers to Stonesfield as a 'town'. This it most definitely is not. It is an attractive small Cotswold village, within an Area of Outstanding Natural Beauty. The potential proposed developments would, by anyone's standards, intrinsically alter the character the village.  
* Stonesfield has already accommodated several developments in recent years (off Combe Road, Churchfields and The Ridings) and larger developments off Woodstock Road and Farley Lane are currently under way. We are not resistant to change and appreciate that people need to have somewhere to live. However, we are at a loss to understand why the village has clearly been targeted for a disproportionate level of development, which would result in the loss of an attractive and popular village in its present form. It would also result in the loss of a considerable amount of agricultural land, currently being used for food production.  
* We urge the Planning Policy Team and West Oxfordshire District Council to consider the views of Stonesfield residents and stop this un-needed and unwanted over-development of our village. |

The Plan shows a parcel of land allocated for a suggested 50 homes. (A planning application is imminent for just over half of this land for 68 homes, by Cala Homes. And the rest of the land? More houses later? What density?) Together with other houses currently under construction this would mean an increase of dwellings (currently some 700) within a small village by approximately 30% within five years. Such an increase is not sustainable. Where will it end?? |
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| MM331|               | Mr & Mrs Drew | Mr & Mrs Drew | Drew   | 614 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190 | The extension to existing built form is not 'logical', and Stonesfield is a village not 'a town'. It has one small shop, and a pub which is struggling to survive. A survey of all villagers carried out in 2010 suggested that residents were in favour of infill sites only, not large-scale development.
Building on green fields which surround the village with light, fresh air, and a multitude of wildlife is not 'logical' in the minds of the people who currently live in Stonesfield. The quality of life would be quantitatively changed by large-scale development of this type.

We would like to comment on the Local Plan 2031 especially with regard to the proposal of additional housing in Stonesfield and the Cotswold Area of Outstanding Natural Beauty. We tried to comment via the website but failed to download the form or find another way to comment as it was so complicated.

We strongly object to any large-scale developments of the type proposed for the village of Stonesfield. Our reason are shown below.

Comments relating to specific points in the plan:

9.6.34d Cotswold Area of Outstanding Natural Beauty

An AONB is supposed to be a protected area from development, however this plan seems to totally disregard this fact. Stonesfield has already had a development of 37 units placed within this AONB and within sight of the West Oxfordshire Way. The proposed new development will also be in sight of the West Oxfordshire Way, with the two developments creating a modern carbuncle on the landscape which according to the Governments "rules" for AONB should not be allowed.

9.6.34h "In terms of detrimental effect..."

Over the past 2 years WODC planning department have approved 65+ new houses to be built within the village of Stonesfield.

There is a Primary School in the village but it only has 5 classrooms. There is also a Pre-school which is housed in a tiny building and already at full capacity.

The Secondary School in Woodstock is almost at capacity, and within the Local Plan there is the proposal for many more homes in Woodstock too.

The Doctors surgeries in Woodstock and Long Hanborough are already stretched and again there is proposals for additional housing in Woodstock and Long Hanborough in addition to that in Stonesfield.

Stonesfield is an old village and the infrastructure and roads can only just cope with the current village population, even before the completion of the current developments at Charity Farm and Farley Close.

The combined sewer along the Woodstock Road is already at capacity and regularly blocks causing issues for current residents. This was noted by Thames Water for the new development at Charity Farm, and an additional 50+ houses on top of the 37 from that development will surely cripple the sewerage system.

MAIN190 Policy BC1a

"...around 50 dwellings as a well-integrated and logical extension of the built form of the town."
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| MM339         |                         | Simon and Jenny | Haviland         | -                 | 640        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 190 | I am concerned about the planned housing developments in Stonesfield. We have heard differing numbers of proposed houses and also the amount of land given over to development. The draft plan is not thought-out or sound. 

There has been no time to allow the village to digest the enormous number of houses proposed, and no opportunity to consult.

The fact that Stonesfield lies in an area of outstanding beauty seems to have been disregarded. The infrastructure of Stonesfield, with its small primary school and narrow roads, is not up to the very large increase in housing development. The character of the village will be entirely lost.

I trust you will reconsider the plan, as it is entirely unsuitable for Stonesfield.

(Jenny Haviland)

On the exhibition panels it states that 50 homes are to be built on land north of Woodstock Road in Stonesfield. Yet I have been given to understand that Cala Homes have already been given permission to put up 68 houses on only part of that parcel of land. |

Stonesfield is a VILLAGE not a town (definition of a town is a settlement with a market), however within this Policy it is regularly compared with Burford and Charlbury which are both towns with many more services and better infrastructure than the VILLAGE of Stonesfield. 

"...positive improvement to main eastern approach..."

The proposed site is open fields and as such fully exposed on approach to the village. The sight of a modern housing estate as the first view of what is an ancient village with many important historical references, is not what one can call a “positive improvement”

Additional comments:

The village of Stonesfield had a population of 1500 at the 2011 census. In the last 2 years WODC planners have already approved 65+ new dwellings within the village. As mentioned above it is an old village with small roads which are badly maintained, few pavements and old sewerage systems which are prone to blockages. It has 1 small shop which includes a post office counter, 1 hairdressers and 1 pub. There is limited public transport and the roads surrounding the village are narrow and again, badly maintained.

We have heard that there is a threat of additional housing on top of that mentioned within this Local Plan, of around 40 dwellings along The Ridings.

The village has already had more than its share of new housing in recent years, and the village cannot sustain further growth on this type of scale.

The village currently has a very good community spirit with many of the local facilities being run by volunteers. There is a great fear that this type of growth will not only kill the local infrastructure but will kill the village as a whole.

We hope that you will take note of our comments as we feel that our village is being used as an easy target for development and we are very worried that the proposed developments will create a massive detrimental effect. |
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<tr>
<td>MM354</td>
<td>Natural England</td>
<td>Marc Turner</td>
<td>Mr</td>
<td>Turner</td>
<td>953</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 190</td>
<td>Allocations in the Burford/Charlbury Sub Area (Land North of Woodstock Road Stonesfield, Land East of Burford, North of Jefferson Place Charlbury and South of Milton Road Shipton Under Wychwood). All these sites fall within the Cotswold AONB. For all four sites the Sustainability Appraisal states that there has been no landscape assessment and a major negative long term effect is anticipated. A landscape assessment needs to be undertaken to inform the selection of site allocations before these sites can be considered for inclusion in the Local Plan.</td>
</tr>
<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1096</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>This site is within the Burford Conservation Area. Nevertheless, Historic England considers that the development of the majority of this site to the west is acceptable but is concerned about the triangle of allocated land to the north-east. The approach to Burford from the east is particularly rural, which makes a valuable contribution to the special interest, character and appearance of the conservation area. As a designated heritage asset, great weight should be given to the conservation of the Conservation Area in accordance with paragraphs 126 and 132 of the National Planning Policy Framework. Any development of this site should therefore conserve or enhance the special interest, character and appearance of the Conservation Area. It is noted that it is proposed to have the principal vehicle access to the site in this north-east corner and that the development of this site is considered to present an opportunity to provide a “gateway” entrance to Burford from the east. However, as noted above, the existing rural approach to Burford is an attractive feature that contributes to the conservation area. We therefore consider that a “gateway” feature is both unnecessary and damaging to the character and appearance of the Conservation Area and object to this.</td>
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</table>

Is this true? If so why are we being asked to comment on a plan that is already out of date?

(Simon Haviland)

Stonesfield and West Oxfordshire need more affordable housing. The proposal to build 50 houses to the north of Woodstock Road will help this. The village would need to adapt to this number of houses. However, there is a major concern that the numbers in the local plan will not be the true extent of the development. At the Parish Council meeting of 1 December 2016 CALA homes reported that they have purchased half of this proposed site - 8.2 of the 15.5 acres - and they propose to build 68 houses on it. Clearly the density of housing involved will be much greater than would be envisaged if 50 houses were built on the 15 acre site. It is a great concern that if this development was allowed in future the rest of the site could be purchased and another 68 houses built on it. Such an increase in houses would be totally unacceptable for a village such as Stonesfield. It would ruin the character of the community and services such as school and roads would be swamped. 50 houses for Stonesfield on this site must stay at 50 houses and not provide a back door for unacceptable developments. Further houses are already being built on Charity Farm (37) and planned east of Farley Lane (13). The 50 must be the limit or the village will be lost as a village. There is also a major concern which applies no matter what the numbers of new houses, namely the dangerous junction from the village road onto the A44 at the Duke of Marlborough. Despite modification this remains a killer junction and increased traffic will increase this risk significantly. Greater traffic will also be using this route from increases in Chipping Norton.
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| MM492        |                         | A. J. T. Bond  | Mrs             | Bond              | 1228       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 191 | element of the proposals.  
If it is not possible to access the site entirely from Frethern Close/Wysdom Way we would prefer to see this allocation dropped from the Plan. If, however, the Council considers that the public benefits of the development of the site could outweigh the harm to the Conservation Area, the proposed access should be kept as low-key as possible with no development either side in this corner of the site.  
I am writing to object to the Local Plan to develop Cole's Field east of Burford by building 85 houses thereon.  
There are a number of key inaccuracies and poorly informed assumptions in the plan which need to be addressed.  
In particular:  
1. The Burford Town Council and local councillors appear not to have been consulted or even made aware of the plan. This cannot be right.  
A detailed site survey and feasibility study has not been carried out, a fact confirmed in para. 9.6.34p in the plan.  
Paragraph 9.6.340 in the plan states that “Any development within or on the edge of the town will therefore fall within the AONB and the scope for avoiding it does not exist other than south of the A40 where the Council’s assessment of land availability has been unable to find any suitable sites.” In fact, there is an ongoing planning application appeal pending for a similarly sized development on the west of the B4020 opposite the Burford Garden Centre. How does this impact the plan?  
Plan specific points  
Burford was quite recently named as one of the most sought after places to live in the world, based on its charm and heritage and so makes it a desirable place to visit and live. This reputation would be in danger and popularity potentially reduced by such a significant extension (built on an earlier stealth extension), as the development would dramatically change the panoramic vista and the balance of heritage to new.  
Contrary to the statement in para. 9.6.34j the site is steep and development of it will result in a significant increase in water run off down towards Orchard Close, Swan Lane, Witney Street and beyond, areas which already suffer in cases of heavy rain where the existing drainage systems are unable to adequately cope.  
Para. 9.6.34k is correct in saying that the site is not within a designated area of flood risk; it is half way up a steep hill! However, the proposed primary vehicular access to it is from a road which crosses the flood plain of the River Windrush which is subject to flooding and indeed has been totally impassable in recent times after heavy rain. This road also has a point where it freezes and there is typically at least one overturned car or accident each year.  
Para 9.6.34k also states that Cole’s Field “is also in close proximity to the centre of Burford with a range of services and facilities within comfortable walking distance.” The proposed route of not walking down Barns Lane to the local shops goes against what happens now and there is no proper footpath. This route is used daily by school children and other locals. Also, the number of cars using this as a rat-run when the high street is busy is increasing, particularly at school times and rush hour. As a single lane, it is dangerous even now and particularly so when the hedges on the properties either side of the road are being cut. |
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| MM506        | GB                      | Mr Bond        | Bond            | 1247       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 191 | I write to object to what appears to be a hasty and ill-considered addition to the Local Plan to develop Cole’s Field east of Burford by building 85 houses thereon.

My objections are as follows:

Procedural

The Burford Town Council and local councillors appear not to have been consulted or even made aware of the plan. This cannot be right.

In winter this road becomes icy and has caused cars and other larger vehicles to slide, damaging the dry stone wall, hitting the cottage on the corner or the house on the corner at the cross roads with Swan Lane. Fortunately, I do not believe a pedestrian has been injured yet.

Paras. 9.6.34k, 9.6.34l and 9.6.34p refer to Burford being within the Cotswold AONB and Conservation Area but considers that “development of this site would not have a detrimental effect on the environment, landscape or any recreational opportunities.” I do not agree and would suggest that any development of Cole’s Field would further destroy the iconic views of Burford and the Church from the A40 coming from Oxford, a view, which it is suggested, attracts tourist into the town to the benefit of the local economy.

Par 9.6.4m states that there are a number of options in terms of access to the site. Each of those detailed are either impractical or dangerous, in some cases both.

The primary vehicular access proposed in the plan is via Witney Street (not the Witney Road as stated in para. 9.6.34m of the plan) and appears to be on a blind bend of the road which has an adverse camber around which cars already travel at excessive speed coming into Burford from the A40 down White Hill. Any entrance to or exit from the site here would be extremely dangerous.

Secondly and as recognised in the plan, both Frethern Close and Barns Lane are narrow with significant on street parking given that most houses do not have off road parking available. The proposed development of 85 houses will undoubtedly mean in excess of 100 additional cars using these already congested roads.

Para. 9.6.34n also suggest that there is an opportunity to provide a gateway entrance to Burford from the east via White Hill and Witney Street. As has been previously mentioned this route is prone to flooding, a risk which would be exacerbated by water runoff from any development. It is muddled thinking, as well as being dangerous, to propose additional vehicular access to the town via this route. Access to the High Street would inevitably be more of a problem as it is already difficult to make a right turn out of Witney Street at most times of the day. Witney Street, like almost every other street in Burford is narrow, especially at the High-Street end where it is one way. As with Frethern Close and Barns Lane, most houses do not have off street parking with the result that cars are parked on one side of the road, from the white gates signifying the entrance to the town, right up to the High Street. White Hill itself is north facing and suffers from severe icing in cold weather, specifically at the junction of the road to Widford where, to my knowledge, at least two cars have overturned in recent cold winters. Any additional traffic on the White Hill and Witney Street route would be dangerous.

Para. 9.6.34n suggests that there would be a beneficial effect in terms of the local economy during the construction phase. It is difficult to imagine how this would be the case and, given the inevitable disruption such construction phases create, it is suggested that it is more likely that there will be a detrimental effect on the local economy, particularly that relating to tourism.
A detailed site survey and feasibility study has not been carried out, a fact confirmed in para. 9.6.34p in the plan.

Paragraph 9.6.340 in the plan states that "Any development within or on the edge of the town will therefore fall within the AONB and the scope for avoiding it does not exist other than south of the A40 where the Council's assessment of land availability has been unable to find any suitable sites." In fact there is an ongoing planning application appeal pending for a similarly sized development on the west of the B4020 opposite the Burford Garden Centre. How does this impact the plan?

Plan specific points

Contrary to the statement in para. 9.6.34j the site is steep and development of it will inevitably result in significant water run off down towards Orchard Close, Swan Lane, Witney Street and beyond, areas which already suffer in cases of heavy rain where the existing drainage systems are unable to adequately cope.

Para. 9.6.34k is correct in saying that the site is not within a designated area of flood risk; it is half way up a steep hill! However, the proposed primary vehicular access to it is from a road which crosses the flood plain of the River Windrush which is subject to flooding and indeed has been totally impassable in recent times after heavy rain.

Para 9.6.34k also states that Cole's Field" ... is also in close proximity to the centre of Burford with a range of services and facilities within comfortable walking distance." It appears to be assumed that residents of new houses on Cole's File would walk into town to do their shopping and therefore bring further business to the town's shops. Experience shows that this will not be the case. The proposed access point on Witney Street will involve a walk of approximately ½ mile each way to and from the High Street. Pedestrian access to the High Street from Frethern Close and Barns Lane will either be through the footpath behind the Catholic church or down Barns Lane and out on to the High Street via Swan Lane. The latter is a route with no footpath at any point. Experience suggests that neither route will be attractive to pedestrians as both routes require a steep climb back up from the town which will not happen if any amount of shopping is to be carried. The alternative options are to drive into town where there will be nowhere to park or, as is usually the case, drive to the supermarkets and shops in Carterton and Witney or beyond.

Paras. 9.6.34k, 9.6.341and 9.6.34p refer to Burford being within the Cotswold AONB and Conservation Area but considers that "development of this site would not have a detrimental effect on the environment, landscape or any recreational opportunities." I do not agree and would suggest that any development of Cole's Field would further destroy the iconic views of Burford and the Church from the A40 coming from Oxford, a view, which it is suggested, attracts tourist into the town to the benefit of the local economy.

Par 9.6.4m states that there are a number of options in terms of access to the site. Each of those detailed are either impractical or dangerous, in some cases both.

The primary vehicular access proposed in the plan is via Witney Street (not the Witney Road as stated in para. 9.6.34m of the plan) and appears to be on a blind bend of the road which has an adverse camber around which cars already travel at excessive speed coming into Burford from the A40 down White Hill. Any entrance to or exit from the site here would be extremely dangerous.

Secondly and as recognised in the plan, both Frethern Close and Barns Lane are narrow with significant on street parking given that most houses do not have off road parking available. The proposed development of
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<td>MM517</td>
<td></td>
<td>Chris Walker</td>
<td>Mr</td>
<td>Walker</td>
<td>1262</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>85 houses will undoubtedly mean in excess of 100 additional cars using these already congested roads. Para. 9.6.34m also suggest that there is an opportunity to provide a gateway entrance to Burford from the east via White Hill and Witney Street. As has been previously mentioned this route is prone to flooding, a risk which would be exacerbated by water runoff from any development. It is muddled thinking, as well as being dangerous, to propose additional vehicular access to the town via this route. Access to the High Street would inevitably be more of a problem as it is already difficult to make a right turn out of Witney Street at most times of the day. Witney Street, like almost every other street in Burford is narrow, especially at the High Street end where it is one way. As with Frethern Close and Barns Lane, most houses do not have off street parking with the result that cars are parked on one side of the road, from the white gates signifying the entrance to the town, right up to the High Street. White Hill itself is north facing and suffers from severe icing in cold weather, specifically at the junction of the road to Widford where, to my knowledge, at least two cars have overturned in recent cold winters. Any additional traffic on the White Hill and Witney Street route would be dangerous. Para. 9.6.34n suggests that there would be a beneficial effect in terms of the local economy during the construction phase. It is difficult to imagine how this would be the case and, given the inevitable disruption such construction phases create, it is suggested that it is more likely that there will be a detrimental effect on the local economy, particularly that relating to tourism. Firstly, as a layperson, I feel it is unreasonable to be asked to make a judgement on the legality or soundness of any of the Proposed Modifications to the Submission Draft West Oxfordshire Local Plan 2031. One respects the professionalism of those who drafted the Plan, working to satisfy the demands made of them from Whitehall and central Government. Broad strategy is their business, but as always, the devil is in the detail. My concern is for the detail affecting Burford, and therefore refer to paragraphs 9.6 34j - 9.634q, in particular. Having lived in or near Burford for more than sixty years, one has the gut feeling that the ‘provision of around 85 new homes’ in one large development is merely to fill a space on a map, without regard for the impact this would have upon the ancient Market Town (or Rural Service Centre in modern jargon) of Burford. The site identified as a ‘sustainable development opportunity’ as seen on a map would appear logical, but as stated in Paragraph 9.6 34j it is a greenfield site, and is prominently visible as such from afar. A dense housing development of 85 dwellings would therefore detrimentally affect the visual setting of the town, as viewed from the North-East, North-West and the East, even with tree-planting and landscaping. Does AONB status count for nothing? Other major concerns are access and drainage. Barns Lane is already at capacity, as is Frethern Close/Wysdom Way. Witney Road is already dangerously narrow, liable to being flooded and has a permanent ice warning, being North facing. Whilst surface water drainage may be managed by installation of Swales and gulleys, the foul drainage in parts of Burford is already at capacity. I have made additional comments on the various paragraphs on the enclosed two sheets, as adapted from the published Proposed Modifications.</td>
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<td>MM527</td>
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<td>A J Hodgkinson</td>
<td>-</td>
<td>Hodgkinson 1276</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>I trust that common sense will prevail, and that local opinion carries some weight in your deliberations. Can the town of Burford, in an ordered society, be regarded as a special case regarding further development? It still 'Just About Manages' with more than its fair share of rapidly increasing volume of traffic using the A40 &amp; A361 and regularly gridlocking routes North, South, East &amp; West of the town. Imposing another main route into the town beggars belief! This compact town has two unique aspects. • The famous view down The Hill with the buildings and shops, bridge etc. • The exceptional east - west rural lanes into the town nestling along the peaceful and attractive Windrush Valley. Regarding Ref 9.6.34p Contrary to this paragraph there will be a massive detrimental impact on the environment, landscape and recreational opportunities, by the imposition of a ‘gateway’ in Witney Street, into a housing estate. This, no doubt, littered with attendant signs and speed bumps. The eastern and western approaches to the town provide rural, precious and fragile tranquility for exploration and enjoyment by visitors, walking groups, dog walkers, cyclists and even a few horse riders, as these lanes only carry light traffic. The Eastern Approach • This is a very popular cycle route • It is also a walkers route with the recent addition of a narrow roadside footpath. However this area is often very wet and the walkers tend to walk along the road. . • Further along this path leads into the fields and the only access to the banks of the River Windrush, for some miles again, making it a very special and popular walk. Visitors approaching the town from the east are entranced by the magical leafy lane, moss covered stone walls and river running deep down in the valley through the trees and are then enticed into a treelined Witney Street and the illusion of a ‘forgotten’ town beyond. The Phillips 'Essential Britain' Road Map shows the road from Asthall to Burford marked with a green line indicating a 'scenic route'. THIS is 'the gateway' to Burford it has been here for hundreds of years! The impact of hundreds of extra cars,delivery vans, and lorries along this narrow, winding, flood and frost-prone lane will lead to accident and injuries, which already happens with the present light traffic. If the lane is widened and 'improved' then even more visitors will use this route and enter the very narrow mediaeval streets creating chaos for all. It would create a 'rat-run' for traffic trying to avoid the frequent gridlock in the town from the north as well as the east.</td>
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<td>MM611</td>
<td></td>
<td>Christopher Walker</td>
<td>Mr</td>
<td>Walker</td>
<td>1388</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>To ask lay persons to judge whether any modification is legally compliant/sound is ridiculous!</td>
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<td>MM14</td>
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<td>Michael Blesovsky</td>
<td>Mr</td>
<td>Blesovsky</td>
<td>15</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>The consideration of building 85 homes on the land east of Burford is unsound on a number of fronts: - a) The AONB. Consider that &quot;The primary purpose of the AONB designation is to conserve and enhance the natural beauty of the landscape, with two secondary aims: meeting the need for quiet enjoyment of the countryside and having regard for the interests of those who live and work there.&quot; This potential development shows disregard for the interests of the people who live and work in Burford, nor can it in any way either conserve or enhance the landscape b) traffic and access. Any consideration of Witney Street, Barns Lane or Fret kern Close being capable of supporting the additional traffic is logistic blindness. Furthermore this only addresses those coming from the Witney direction. Those from Cheltenham would quite likely turn down The Hill and into Swan Lane, which is totally incapable of supporting additional traffic - it would be dangerous. Those coming from Stow or Fulbrook would come over the bridge and go where? The only options would be Church Lane or Swan Lane again, neither are suitable c) need. Surely development should respond to need? As was written in a recent issue of the The Bridge the Burford community only needs a handful of new homes, and since we have minimal or zero unemployment in the town most of the people moving to this development would be commuting. We don't need more traffic on the A40 and moving it into the smaller White Hill, Witney Street etc roads is not an answer c) the community simply cannot support the additional numbers, whether the transport and services infrastructure, employment or the Burford surgery d) flood risk. It is a well proven fact that developing on farmland significantly increases rainwater run-off and therefore flood risk. Where will the run-off from Coles Field go? Straight down to Orchard Rise and Witney Street I believe any plan to build on this scale on Cole's Field is totally unsustainable and should not be allowed to proceed.</td>
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<td>MM741</td>
<td>CPRE Oxfordshire</td>
<td>Helen CPRE Oxon</td>
<td>Mrs</td>
<td>Marshall</td>
<td>1583</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>There are traffic issues at Burford, with the A361 becoming ever busier and the junction between the Shilton Road and the A40 being dangerous. It's almost impossible to turn right from Shilton Road onto the A40 and it's also difficult to turn into Shilton Road, coming from the west on the A40. Extra traffic will exacerbate the danger. The North Carterton development will be additive, not least because it connects up to the rear of Shilton Park and allows the associated residents of approximately 1,700 houses easy access to Shilton Road and to the dangerous junction in question. Therefore, opportunities for growth are limited. Burford also has limited public transport to main employment centres.</td>
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<td>MM746</td>
<td>Hallam Land Management</td>
<td>Hallam Land Management</td>
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<td>Hallam Land Management</td>
<td>1824</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford</td>
<td>Non-Strategic Allocations, Land East of Burford (Main Modifications 185, 187, 191 and 193) The proposed allocation 'Land East of Burford' is located wholly within the Burford Conservation Area which was designated in 1970. The site also forms part of the setting of Burford High Street, the historic core of the Conservation Area which contains a high number of listed buildings. The site is also in the Cotswolds AONB</td>
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Paragraph 126 of the NPPF states that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment and ‘recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate for their significance’. Designated heritage assets including Conservation Areas and listed buildings are further protected by the Planning (Listed Buildings and Conservation Areas) Act 1990.

Section 72 of the 1990 Act states that with respect to land in a conservation area ‘special attention shall be made to the desirability of preserving or enhancing the character or appearance of that area.’ In relation to listed buildings, the Section 66 states that when considering whether to grant planning permission for a development which affects a listed building or its setting, the decision maker must ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.

While an allocation in a local plan is not tantamount to a permission itself, it does provide certain assurances that the principle of development of the site is accepted. Historic England have produced guidance on the process of local plan allocations affecting heritage assets in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans. The guidance encourages local authorities to properly consider the historic environment in preparing local plans, helping them to ensure that the statutory tests are met and that the plan can be sound. In particular, the note sets out that local planning authorities should make sure that the significance of heritage assets is understood when considering allocations. ‘This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value’ (Historic England Advice Note pg. 4).

The suitability of the site for development has been questioned throughout in the emerging evidence base for the local plan and has been discounted as unsuitable in the 2014 Strategic Housing and Employment Land Availability Assessment (SHELAA). It is unclear, without any further heritage or landscape evidence having been produced, how this position has changed in the interim period to the 2016 SHELAA, changing the recommendation from ‘not suitable’ to ‘suitable’. The 2014 SHELAA assessed the site (143 and 144) as unsuitable for development stating that the site: ‘forms part of attractive entrance to Burford from the east and is a key element of the local character. Very poor access to site would prevent development without large scale tree felling. Site contributes to the character of the Conservation Area. ‘The impact on the setting of the Conservation Area outweighs the need for development in this part of town’

In contrast the 2016 SHELAA now states that ‘whilst views of the site can be achieved from the north-east development if designed sensitively [it] would read as part of the existing built form of the town.’ The reason for the conclusion of suitability is set out in the SHELAA that ‘the site is considered suitable for development subject to overcoming access constraints and provided development is designed to read as part of the existing settlement’.

There is no explanation in the SHELAA or the Local Plan evidence base of how such a different conclusion to that of 2014 has been reached, or for that matter why reference is now made in the Main Modifications to the acceptability of development in the east of the town with no evidence to support it.

The 2014 assessment states that the site itself contributes to the character of the Conservation Area. Although there is no Conservation Area Appraisal for the Burford Conservation Area, it is reasonable to conclude that this greenfield site has been included in the conservation area (since its extension in 1991) due to its openness, and contribution to the green setting of the built up area of the town itself.
Land to the East of Burford forms part of the overall landscape setting of the Conservation Area and is important in terms of its undeveloped character. It is not clear from the proposed Main Modifications how development of the site so that it would 'read as part of the existing built form of the town' would preserve the or enhance the character and appearance of the area which is important for its open and undeveloped nature. It is therefore contended that this development would cause harm to the Conservation Area.

Case Law has clarified the interpretation of the statutory duties to preserve and enhance heritage assets. In the Court of Appeal Decision R (on the application of The Forge Field Society and others) v Sevenoaks District Council [Case No [2014] EWHC 1895 (Admin)] where there was need for development but the development would cause harm to heritage assets, the need to consider alternative sites was emphasised as part of the statutory duty of preservation. In this case, the site was in the AONB, a conservation area and in the setting of grade II* and grade II listed buildings. Linblom J set out in the decision that:

The lack of an updated evidence base with regards to proposed allocations and the historic environment indicates that the plan has not been positively prepared, is not consistent with national policy and does not meet the legal requirements for protecting and conserving the historic environment.

This raises concerns about the level of research the Council have done into the impacts of the development on the natural and historic environment. The SA Appendix 5, which assesses the proposed non-strategic allocations, states that Land to the East of Burford does not contain any designated heritage assets and considers that potential impact on Proposed Local Plan policy OS4 (High Quality Design) will provide sufficient mitigation of harm (pg 97).

The site selection process and the sustainability appraisal are clearly fundamentally flawed, it does not get close to understanding the potential harm and impact of a potential development on a nationally significant conservation area with a high proportion of listed buildings and a pristine historic core. While the SHELAA assessments refer to the conservation area, the site selection process appears to have been blind to these potential risks and has failed to properly consider viable alternatives which are less constrained and more appropriate. This is further compounded by the fact that the Cabinet Agenda Report from the 19th October 2016, when the main modifications were approved by Cabinet stated that the Land East of Burford, ‘lies outside (although adjacent to) the Burford Conservation Area’. This raises serious concerns and does not instill confidence that the Council have considered the site allocations in anywhere near enough detail, indeed the Council made a decision to progress to consultation based on false information put in front of them.

Landscape Impact

The proposed allocation at Land to the East of Burford is located within the Cotswolds AONB. Paragraph 115 of the NPPF sets out that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'.

Areas of Outstanding Natural Beauty are designated in accordance with the Countryside and Rights of Way Act 2000 which confirms that the purpose of designating AONBs is the conservation and enhancement of natural beauty of the area. It also requires a management plan to be produced for each AONB to formulate policies for local authorities and for carrying out their functions in managing it.

The most up to date landscape assessment for the district is the West Oxfordshire Landscape Assessment
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| 1998 (WOLA). The WOLA identifies Burford as being part of the Upper Windrush Valley As set out in the proof of evidence of Mr. Benjamin Rosedale at the recent appeal inquiry for Land at Shilton Road, the site is widely visible from the north and east and contributes to the distinction between the northern areas of Burford and the historic core on the river terrace to the south. The WOLA identifies several characteristics of the Upper Windrush Valley Landscape Character Area which are set out in Mr. Rosedale’s proof of evidence:

- moderate to high intervisibility, distant views along and across the valley;
- valleyside/ urban edge very visible from Fulbrook;
- classic distant view of the church spire approaching Burford on the A40;
- urban edge harsh in places, particularly viewed from A40 entering Burford and on Witney Street;
- urban silhouette from valley floor harsh in places’.

The WOLA also identifies key sensitivities including that any further urbanisation of the A40 corridor should be resisted as change would be visible. Overall, in his proof of evidence, Mr. Rosedale concludes that:

‘It is clear that the development to the east of Burford would be both prominent and harmful to the distinct character of Burford when viewed from the east and north (largely from locations within the AONB)’.

The allocation of the land to the east of Burford should not be allocated in the WOLP. It is not sound in terms of national policy, or justified in terms of evidence base.

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<th>MM112</th>
<th>Mr J P Hawkins</th>
<th>Mr Hawkins</th>
<th>280</th>
<th>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</th>
<th>I write with regard to MAIN 191 – Land East of Burford (85 homes)</th>
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<td>I would like to object to the proposal for the possible development of 85 new houses, making the following points:</td>
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<td>* There is a flooding risk. Orchard Rise is positioned directly below the field in which the new development is proposed. Additional build will affect the capacity of the field to absorb water. There is a high water table on the land due to natural springs. There have been occasions in my own back garden where the grass has risen up during heavy run off due to the extent of the water flowing down the slope beneath the ground. There can be no doubt that the development will affect the water table. Indeed this is also likely to affect locations further down the slope such as Windrush Close and Swan Lane. It is clear to all that during heavy rain even Witney Street floods due to the volume of water running down the slope. Concreting over the field will make all this significantly worse.</td>
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<td>* Burford is a highly attractive, unspoilt town with rural character and is within the Area of Outstanding Natural Beauty and the Conservation Area. Many of the buildings are listed. Development on this scale will just turn it from a popular tourist attraction into one large housing estate. The whole idea of the ANOB should be to prevent major development in order to maintain our heritage. It is noteworthy that previous SHELAA Settlement Summaries concluded that constraints imposed by the overall environmental quality of the town and landscape setting within the ANOB means that large scale housing development is not appropriate in Burford. So what has changed.</td>
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<td>* Facilities in Burford are insufficient to support development on this scale. The schools are full as is the doctors surgery. It is a small town and significant development will just overwhelm these facilities.</td>
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* Access to the proposed site is undoubtedly problematic. It is not really viable to have the primary vehicular access from the East, with the proposal to make this a gateway. Witney Road, as it is referred to, is a narrow winding road which is in poor condition and quite dangerous around the entrance to it from the A40 when it freezes. It is hard to see a point where vehicles could safely come off it to access the potential new development due to the blind turns. Further along towards the High Street it becomes narrow with tightly packed historic buildings. Encouraging traffic down this route is a bad option. Naturally not everybody will access from the East. From other directions there are many issues which have been well documented over the years. Barns Lane is narrow and without footpaths in places, Frethern Close and Wysdom Way are narrow roads with significant on street parking. The general width of all the residential streets in this area has always been flagged as a concern by the County Highway Authority who have clearly stated that access is not suitable for significant development.

* The plan generally seems to suggest there will be little impact to the views around the Burford area. This is inaccurate as a major development in this location will be noticeable from most directions of travel both by car or on foot. From the A40 to the east the views are quite stunning down to the church, equally there are views from the Stow Road and Fulbrook. It is just not right to say the site is reactively well screened from wider views. The site does sit high on the ridge line overlooking the Windrush Valley and thus the field is an important open gap.

* The British Geological Survey has assessed this site as having low potential for natural ground instability. Whilst this is precautionary it does state that it is dependent on local conditions such as proximity of trees or areas where trees have been removed. Clearly construction may well impact this also. Our wall is actually close to collapse, perhaps caused by the water run off, perhaps by the instability but either way major development on the field is going to have a negative impact on this.

* The wedge shape land in the North East corner is made up of trees and vegetation immediately adjacent to no. 12 and no. 14 Orchard Rise. To suggest this land and a bit further to the East could be used for access is hard to understand. Previously the County Highway Authority has said that satisfactory access could not be achieved due to the road realignment, vegetation and the gradient of the land. The land containing the trees and vegetation is part of the rural approach into the town, it is not part of the field and indeed it is not clear who actually owns it. It should be maintained to offer a contrast to the housing and fields around it.

* Many of the properties surrounding the proposed development will be The field in places is at the same height as the roofs of houses on Orchard Rise as an example so this is inevitable.

In summary to allow a development of this nature would stand sensible planning on its head.

I would like to add additional comments regarding Access Witney Street from one end to the other is quite unsuitable. Traffic from the A40 will be problematical whether it is turning right, where tailbacks will be created or left where traffic slowing down will cause hazards. The road is narrow and winding and hardly wide enough for two vehicles especially if one of those is a truck. There is no feasible places where traffic could come off it and enter the potential new housing development. At the far end, entering the High Street, traffic will be tailing back attempting to get onto the already clogged High Street.

Consideration should be given to construction traffic. There is no way these vehicles could safely access the proposed site from either Witney Street or Barns Lane.
I write with regard to the above and the flooding risk I have previously highlighted. Such is my concern that I have taken advice from an expert hydrologist.

I live in Orchard Rise, the proposed development borders this to the south. The land in question slopes quite significantly down to Orchard Rise and indeed down to Witney Street. This is a hillside in all reality.

With regard to my own property, No. 12, during periods of heavy rain a section of the grass in the back garden actually rises up due to the volume of water flowing beneath it. I am also aware from my neighbours that surface water is visible within the gardens of their own properties. This is undoubtedly due to the fact that Orchard Rise is built on land dug from the hillside.

I have been advised that risk of flooding is likely to increase due to water draining from the new development via the infiltration method. This applies particularly to Orchard Rise where the gardens are steep and both the soil and rock from the hillside have been moved during the original construction. In addition to this during periods of exceptional rainfall the water will only move down hill and without the land to absorb it the flood risk will increase. The same scenario would also apply to Witney Street which already floods.

It is also worth considering that any access from Witney Street will be a sloping road where the water will just run down the slope causing significant flooding.

Apart from the visual impact from the Windrush Valley, as pointed out in para 9.6.18, we would raise the following points.

* Traffic management: It is clear from the proposals for the main access routes to be from Barns Lane, Frethern Close and Witney Street that there has been no study of these roads to assess the impact such access would have. Barns Lane is extremely steep and in some points only single lane, with the remainder subject to on road parking down one side at all times. Frethren Close leads directly into Barns Lane at the top of the hill with a narrow corner joining Barns Lane to the roundabout on the A40.

* The suggestion in 9.6.34m that "provision of satisfactory vehicular access and appropriate pedestrian and cycle connections from the Witney Road will be required to contribute positively to the eastern approach into Burford providing a 'gateway' entrance to the town's simply not feasible. Witney Street while wider to the Eastern end (from the Fire Station to the white gate boundary of the town) also has on-road parking 24/7 such that two cars cannot pass. To the West of the Fire Station, where the older buildings are, there is on-road parking on both sides of the road, across the Pytts Lane/Guildford crossroads, up to the entrance to Sylvester Close. After this, to the High Street the road narrows and is only just wide enough for one vehicle – and already delivery lorries are causing holdups and potential damage as they try to turn from Witney Street into the High Street.

* This access – presumably beyond the white gates – does not take into account the slope of the field, nor the blind corner 100 yards beyond the presumed junction. Traffic already comes round that corner at speed (a recent survey carried out, presumably by Highways, will confirm this). In addition this stretch of Witney Street, the start of a popular walk along the Windrush Valley, has no pavement, is lined by a dry stone wall and magnificent beech trees on the continuing slope. At the far end of Witney Street the road becomes White Hill, a steep, narrow (two cars have trouble in passing on this) and in the winter icy north facing slope. The new access proposed will also be north facing and since it will be the natural route for any surface water to escape, a real hazard in winter.

* The draft plan already notes that Burford already has problems with HGV traffic flow in para 9.6.11 which can only at the moment come down the hill from the A40 roundabout. The suggestion that White Hill/Witney Street should become the main gateway to Burford is unrealistic. Witney Street leads into the High Street through a very narrow gap between two buildings including the alternative routes from Witney Street to the High Street, via Pytts Lane/Swan Lane or via Guildford/Church Lane all are narrow at the junction with the...
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| MM26         |                         | Gordon Jolly    | Mr Jolly         | 43         | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 191 | High Street, and with on-street parking 24/7. At the moment thanks in part to the lack of signage to Burford at the top of White Hill the traffic flow down into the town is just about acceptable – but any large vehicle chancing it causes immediate problems and hold ups.

* 85 houses in the modern era usually would mean that provision of parking for at least 150 cars would be required. Parking in Burford is already at bursting point, hence the on-street parking everywhere in the town – there is only the one car park at the bottom of Guildeford, and that floods in the winter. It is more likely that any residents of this development would use the shopping facilities in Witney and Carterton where there are superstores and plenty of parking

* Flood risk In recent years we have seen on our televisions all too often the flash flooding around the country which is aggravated in many areas by the asphalting/building over of fields that have historically absorbed the rainfall as and when required. There are many houses directly below the proposed development of Cole’s Field that would be at risk – particularly the houses in Orchard Rise, Windrush Close and Swan Lane Close and then on down into Witney Street/Chapman’s Piece by/below the Fire Station, as well as at the East end of Witney Street.

I would question the suitability of any additional housing in Burford given the historic and scenic nature of the town and the need to preserve its unique character. This unique character is what attracts the very many visitors who ensure the continued economic viability of the town. In the absence of any other major employment opportunities, it is tourism which sustains the town and a modern housing development on the eastern side of the town would do nothing but detract from the town’s attractiveness. Burford would risk people approaching from the east, simply continuing along the A40 when they see a new housing development and conclude that they are just passing another commuter satellite of Oxford or Witney. If new housing capacity is proposed then it should be located away and out of sight from the major approaches to the town (A40 / A361), preferably on a small scale utilising infill sites.

I would reiterate the issues raised previously by many others as regards to Burford’s continuing lack of infrastructure capacity e.g. drainage or schooling and medical availability for additional inhabitants. These would of course apply to this development proposal.

I note with great concern the comments in paragraph 9.6.34m which suggest that there might be an “... opportunity to provide a gateway entrance to Burford from the east.” I can only assume that this would envisage Witney Street becoming a major approach road into the town. I do not believe that this is a sensible course of action for the following reasons –

1) Witney Street is a residential street which comprises a large number of listed buildings. These buildings are very close to the roadway with no pavement on the southern side. Many properties at the western end near the junction with the High Street, front directly onto the roadway with related safety risks for additional inhabitants. These would of course apply to this development proposal.

2) Witney Street is very narrow particularly at its western end near the High Street where it is only one lane wide (with no access from the High Street) and one-way. This narrowness is exacerbated by the unavoidable need for residents to park their vehicles on both sides of the roadway, which can again reduce the roadway’s width to one lane, especially to the west of the junction with Guildeford.

3) Over recent years, Witney Street has become a convenient short-cut or “rat run” for motorists seeking to avoid congestion along the High Street and up and down The Hill. This short cut via Church Lane and Guildeford is particularly busy at peak rush hour times of the early mornings and evenings when traffic volumes and related safety risks (including speeding) increase significantly.

4) I believe that the safety concerns highlighted in 1) - 3) above are what prompted Burford Town Council’s
5) Burford fire station is located on Witney Street and the fire engine has encountered problems on occasions when attempting to urgently travel towards the High Street due to the narrowness of the roadway or the volume of queuing traffic at certain times.

6) The buildings in Witney Street (the majority of which are listed) are highly susceptible to vibration from passing vehicles. Increased traffic volumes and perhaps heavier vehicles can only serve to increase the risk of structural damage to these protected, heritage buildings.

7) At the eastern end of Witney Street, outside of Burford town itself where it climbs/descends White Hill near the Widford junction, the road is narrow and it is highly susceptible to prolonged icing in the winter months. The road is not suitable for high traffic volumes travelling in both directions. The current signage pointing to Widford is highlighted as "Single Track Road" for this very reason. Signage pointing to Burford from the A40 would not be appropriate.

As per paragraph b) of Policy BC1b within the Local Plan document, there is discussion of potential vehicular access to the proposed housing development from "the Witney Road". The eastern "gateway" is again mentioned, but I would suggest that my comments above would argue against both of these scenarios. The potential site of any vehicular access would be on a blind bend in the narrow road and it would likely be on a steep slope. Water run off would also be encouraged in an area of the road where flooding has occurred in the recent past.

I would like to object to the proposal for allocating land to the east of Burford for a possible development of 85 new houses (para 9.6.1 and following of the draft local plan). In support of this I wish to make the following points.

* Burford is a unique and historic town with a special character and an exceptional collection of listed buildings. It is a major attraction helping to bring many tourists to West Oxfordshire. It missed out on being developed in the 19th century as the railway line was built along the Evenlode valley and not along the Windrush valley. More recently it was protected by enlightened planning policies which prevented a housing estate being built in the town and only allowed small amounts of building around the edges. The proposed development would completely change the character of the town.

* Burford falls within the Cotswold AONB and previously it has been understood that this was sacrosanct and that major development in the AONB would not be permitted.

* The draft plan says that the proposed site is "relatively well-screened from wider views. Whilst views of the site can be achieved from the north east when travelling along the A361 these are relatively fleeting..." (9.6.34l). It is difficult to make sense of this. Is it only the view from a car while travelling along the A361 which is considered relevant? If anyone had walked along Westhall Lane in Fulbrook or up the path from Burford Bridge (popular walking routes) they would found that the site is in plain view. (It should be noted that land to the south of the A40 is outside the AONB is not part of the view from the north).

* The site slopes gently down to the north and at the bottom of the field the land drops steeply down to Orchard Rise. If houses are built in the field, there is an obvious risk of flooding in Orchard Rise, Windrush Close and the eastern end of Swan Lane. These areas only narrowly escaped flooding in 2007 because the field was able to absorb rainwater. (It does not help that WODC has already given planning permission for a new house in Swan Lane which will involve a number of trees being removed.)

* The draft plan contemplates that the main access to the site for vehicles would be from what it referred to as the Witney Road and further that this road would become a main gateway to Burford from the east (9.6.34m). This is in fact a narrow, unclassified lane. It eventually leads to a narrow section which in turn...
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| MM287        |                         | Michael Tancock | Mr               | Tancock           | 502        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 191 | Dear Sirs,  
I am writing to register my objection to certain developments included in the West Oxfordshire 2031 Local Plan, in particular those concerned with "Land east of Burford", paragraphs 9.6.34j through 9.6.34q.  
Considering first of all the visual impact as covered by 9.6.34l, the statement that the site is well shielded from wider views is wholly unsupported. No mention is made of the view from the approach via the A424 where any development would appear as an obvious scar in an otherwise pastoral landscape. Similarly no consideration is given to the impact on the overall character of the surrounding environment as currently enjoyed by residents to the south of the proposed development.  
When the question of access is considered as per paragraph 9.6.34m then the viability of the proposed development as a whole must be tenuous in the extreme. Taking the proposals in order, that from the Witney Road does, simply when viewed on a map, appear to be a reasonable option. The question however is what does the traffic do once it is on the Witney Road, and how might it access that? Witney Road is accessible from the A40, however this is a difficult junction only really suitable for access from the east. Even then the volume of traffic on the A40 makes exiting or joining the A40 a difficult and frequently hazardous operation.  
Considering westbound access there is none for traffic approaching from the west. Witney Street is closed to... |
traffic from High Street leaving the alternatives of Church Lane, Swan Lane and Barns Lane. Church Lane is narrow and has a number of sharp bends and also carries significant traffic using the main car park. Swan Lane is narrow and does not allow two vehicles to pass. Furthermore the crossroads with Barns Lane and Pytts Lane is also narrow and has poor visibility.

Access via Frethern Close and Wysdom Way is also highly questionable. Few properties in Frethern Close have driveways and the resulting parked vehicles (see illustration below) render it effectively single line only for much of its length. A key element of many of these routes is Barns Lane itself. This also has stretches of single line traffic, particularly in the lower section which also has a significant gradient. Barns Lane is not only difficult to exit from at the A40 roundabout but frequently difficult to enter safely owing to the inability of traffic leaving The Hill to recognise the existence of the Barns Lane exit.

Whilst paragraph 9.6.34n makes reference to the AONB designation it ignores the fact that the proposed site is also within the Conservation Area, something that should surely raise further doubts as to the viability of such a development. Given the lack of any major contractors in the area it is difficult to envisage how the “beneficial effect in terms of the local economy during the construction phase” is likely to be realised. More significant is the potential detriment to the local economy in the future. 9.6.34o reinforces the issue of the AONB and in some respects appears to contradict the reason for the development set out in the previous paragraph. The statement that “the scope for avoiding it does not exist other than south of the A40 where the Council’s assessment of land availability has been unable to find any suitable sites” does not stand up given that a development south of the A40 (Shilton Road) is currently awaiting appeal.

The statement in 9.6.34p to the effect that “it is considered that development of this site would not have a detrimental effect on the environment, landscape or any recreational opportunities” can only have been written by someone who has either never visited Burford or who has no empathy for the vision of the Cotswolds as perceived by the majority.

Finally I should also like to raise some other points which do not appear to have been considered in the plan. Given that the proposal is for 85 homes it is not unrealistic to assume that a reasonable proportion will be occupied by families, many of whom will have children of primary school age. This would place additional demands for local schooling, something that is unlikely to be met by Burford Primary School in its present form. Another point concerns the increase in local traffic that is likely to arise and the associated demand for parking space in the town. In spite of its relative proximity to the town centre there will inevitably be residents who will insist on driving to the town, potentially reducing the availability of parking space for those genuine visitors on whom the commercial wellbeing of Burford depends.

I also feel strongly that there has been no prior consultation with members of Burford Town Council who would almost certainly have been able to provide constructive and reasoned feedback on the current proposal. The fact that the proposal is even mentioned at all without any form of survey, or diligent research into the impact of significant rainfall on the site suggests an inadequate level of research.

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<td>MM297</td>
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<td>Nigel Barraclough</td>
<td>Mr Barraclough</td>
<td>512</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charbury Sub Area &gt; MAIN 191</td>
<td>It is not Legally Compliant as there was no community involvement concerning the proposed development of land east of Burford - the first we knew of it was when the draft Local Plan was issued. It is Unsound as this development is not the most appropriate strategy to develop extra housing in Burford - there is a much less environmentally damaging and easily accessed site available on the west side of Shilton Road opposite Burford Garden Company. The land east of Burford is unsuitable as (a) it will have damaging effects on views approaching the town from both the north and the east and (b) access to the site would be poor.</td>
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<td>MM24</td>
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<td>Peter Higgs</td>
<td>Mr</td>
<td>Higgs</td>
<td>59</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
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Policy BC1b justification is flawed on the following grounds.
Paragraph 9.6.34k
This states “Key considerations for this site are the landscape and visual impact of development, vehicular access arrangements and the fact that the site is located within the Cotswolds AONB and Conservation Area.” As these are key, I believe they are contrary to the overall strategy given in Paragraphs 4.2 and 4.7 Paragraph 9.6.34l
The proposed development of 85 houses east of the town would not only impact the setting of historic Burford, where there are over 250 listed buildings, “fleetingly” when viewed from the A361 to the North as this paragraph states, it would also impact the view far more from the A424 as you approach the town from the north. There is a wonderful view of the historic layout nestling in the Windrush valley from over a mile away, which would be overshadowed by the sight of the new development high up overshadowing it. In addition, the view from the east on the A40 would also be impacted, where the view of the Grade 1 listed St John the Baptist Church spire would be significantly affected, as would the view from the minor road from Whitehill that enters Witney Street, Burford from the east. Finally, the views of historic Burford enjoyed by the many walkers who use the footpath beside the Windrush to the east of Burford would also be adversely affected.
For this reason this policy does not comply with policy EH7, as the harm would be significant to the Conservation Area and Cotswold Area of Outstanding Natural Beauty.
Paragraph 9.6.34m
This states that the proposed primary access would be from Witney Road. This is known locally as Witney Street. If this were to be the primary access, then any vehicle approaching from the north would have to either negotiate the narrow Church Lane and Guildenford, with the three 90 degree turns, and then turn out of the narrow and blind junction from Guildenford onto Witney Street, or to travel right through Burford town, adding to the congestion, up to the A40 roundabout, and then enter through Barns Lane, Frethern |
Close, and then Wysdom Way or through the narrow access directly from Barns Lane. Traffic from the south and west would also have to use the same routes in.

Only traffic from the east would use the route in down Whitehill and onto Witney Street. Just at the point where the new access is proposed is a “frost hollow”, made more dangerous in winter by the flooding across Witney Street from the hill to the south. This is evidenced by the “Ice” road traffic sign as one leaves Burford on Witney Street, and as you enter Whitehill.

There is also some access proposed through Barns Lane. This would probably be the route chosen by pedestrians to reach Burford Town Centre, the Primary School, and the Doctors Surgery in Sheep Street, as this would be by far the shortest route.

To use this route, pedestrians would have to walk down the single-track narrow steep north-facing hill of Barns Lane, which has high Cotswold stone walls on either side. There is no pavement, and pedestrians need to stop to allow vehicles to pass. This road also frequently freezes over in the winter as it is north facing and steep.

Finally this location is on the opposite side of the busy A361 from the main local services of the Primary School, the Pre-school, the Secondary School, the Doctors Surgery and the local Pharmacy, the Library, the supermarket, and the recreation ground. There is only one controlled crossing on the A361 in the lower centre of the town.

For these reasons, Policy BC1b does not comply with Policy OS2 - Locating Development in the Right Places, Paragraph 9.6.34o

Whilst this points out that development elsewhere is nearly all “washed over by the Cotswold AONB”, it does not consider development outside the Conservation area. The proposed site is in both these areas, but there are possible sites to the west of Burford which are outside the conservation area, and these have not been considered. In addition, these sites would have no visual impact on the Historic Town or listed buildings.

I take issue with the following statements made in the proposal:

"Good transport links" - The A40 approach, particularly from the East and the A361 through the town centre are constantly busy roads with major congestion regularly experienced during peak times with traffic sometimes queuing back to the Windmill Carvery roundabout at the end of the A40 dual carriageway.

"The area is gently sloping" - The land in question has a slope of around 10% which causes severe water run off

"The site is not within a designated area of flood risk" Despite the agricultural nature of the land at present, there is still a degree of flooding. Housing on this land would increase the amount of run off and exacerbate the problem of flooding on Witney Street.

"Primary vehicular access would be taken from the NE corner" & "Secondary vehicular access may also be achieved from FrethernClose/Wysdom Way & Barns Lane". These roads, and the roads that lead to them are narrow roads, often with vehicles parked on one side meaning transit along them is difficult at present. A proper traffic survey would show these options to be unfeasible.
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<td>MM30</td>
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<td>Ivan Hall</td>
<td>Mr</td>
<td>Hall</td>
<td>62</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>&quot;the site is relatively well-screened from wider views&quot; - this site is clearly visible from both approach roads from the North (A424 &amp; A361) and also from the West bound A40. I object to the proposal within the draft Local Plan to allocate land to the east of Burford for a potential development of 85 new houses. My key objection is on the grounds of the robustness of the plan; practicality of its delivery; and safety of residents and visitors. The following comments are in support my objection: * Burford is a major attraction in West Oxfordshire with residents and with an increasing number of visitors. The town responds to people's need to experience historical buildings and other facilities in a pleasing rural environment. Previous planning policies have prevented significant housing developments that would substantially change the town's character. This proposal appears to reverse previous policies and puts at risk the town's continued attractiveness. * Burford is within the Cotswold AONB. This status has previously been deemed to be sacrosanct and major development in the AONB has not previously been permitted. Again the proposal reverses previous policies. * The draft plan (9.6.34l) states that the proposed site is 'relatively well-screened from wider views' and that it is only drivers travelling along the A361 from the north east that would have a &quot;relatively fleeting&quot; view of the development. This is incorrect as the site is also clearly visible to drivers on the A429 and A40 and to the many (circular) walkers along Westhall Hill to the north and on the road between Fulbrook and Swinbrook to the east. * The draft plan also incorrect when it states that the site slopes &quot;gently down towards the north east corner and the Witney Road&quot;. In fact the slope is very steep both to the proposed northern access point and down to the houses on Orchard Rise. Any development would bring a clear risk of flooding to dwellings in Orchard Rise, Windrush Close, Swan Lane and down as far as Witney Street. All such premises to the north of the site narrowly escaped serious flooding in 2007 because the field was able to absorb the significant rainfall that year. * The draft plan contemplates that the main vehicular access to the site would be from Witney Street (aka the Witney Road in the draft plan) and this road would become a main gateway to Burford from the A40 and the east (9.6.34m). I believe that there are a number of serious flaws in such a plan: (i) Leaving the A40 from the east into the so called Witney Road (White Hill) is a major safety hazard for drivers, particularly at night and in poor visibility. The junction is difficult to see and nerves of steel are needed when waiting in the middle of the carriageway with vehicles passing closely on both sides at 50+ mph. One nudge from behind could easily take turning vehicles into the west bound traffic. (ii) The Witney Road is a narrow, unclassified lane that experiences flooding, severe icing and fog pockets in the winter. This results, in particular, from surface water running down the hill from the field to the south. (iii) The Witney Road is also part of the National Cycle route (57) with a large and increasing number of cyclists, both individuals and groups. These (and walkers taking the popular circular walk from Burford around to Widford, Swinbrook and Fulbrook) already provide a safety hazard (and are at risk) along the narrow road. (iv) When continuing along into town from the east, the narrow road continues with many single passing places around parked vehicles. In turn, this leads to the junction with Burford High Street - a busy junction that is regularly congested by vehicles (some heavy) trying to make a right turn into the High Street. Safety is also compromised for the many pedestrians trying to cross Witney Street at that point. (v) Vehicular access to the site from the north, south or west would also be complicated. Options appear to be either manoeuvring through the centre of Burford with several turns, narrow roads and busy traffic (particularly in the summer months): using the narrow and steep Barns Lane with its many parked cars and a</td>
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6. The previous draft local plan said that "the development potential of land surrounding Burford is heavily constrained by the sensitivity of the landscape although there may be some scope for a small-scale extension of the built-up area" (9.6.26). This has been struck through in the new draft with no explanation as to why this is so. Clearly Burford should take its proper share of new dwellings to meet local needs and some of these have already been met with smaller-scale developments in Falkland Close and within the Frethern Close estate. In addition, the previous draft also identified further possible sites as follows:

- Tanners Lane, Burford
- Burford Cottage Hospital
- Land south of Sheep street, Burford
- South of Milton Road, Shipton under Wychwood.

It is not clear why these have been struck out. It is also unclear whether serious thought has been given to land on the south side of the A40 (outside the AONB and not in sight from the north) – see 3. above.

7. Fortunately Burford has minimal unemployment and the plan appears therefore to seek to deliver housing, in particular, for Oxford commuters and their families. This would simply add to a badly congested A40. Such needs could be facilitated from elsewhere in West Oxfordshire where there is a better road network and frequent rail and bus services.

8. Finally, housing should be accompanied by infrastructure. There seems to be no plan in place to deal with how the residents of new development will get around, where their children will go to school (Burford Primary School is, I understand, already over-subscribed) or where they will find medical facilities.

In conclusion, I believe that the draft proposal to allocate land to the east of Burford for potential development of 85 new houses is not robust in its reasoning, is not practical in its design and is unsafe for residents, drivers, cyclists and other visitors.

What changes do you consider should be made to address your comment?

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<tr>
<td>MM964</td>
<td>BURFORD TOWN COUNCIL</td>
<td>Burford Town Council</td>
<td>Mrs Andrews</td>
<td>724</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191 *</td>
<td>twice-daily route for children and parents walking to the primary and secondary schools; or passing Burford on the A40 and doing a difficult 270 degree turn into the east end of the Witney Road near the Ramping Cat House.</td>
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<td>MM386</td>
<td>Cotswolds Conservation</td>
<td>Cotswolds</td>
<td>Ms Rood</td>
<td>836</td>
<td>&gt; SECTION 9 MAIN 191. Land east of Burford (85 homes)</td>
<td>* Paragraph 9.6.34o of the Plan states that WODC has been unable to find any suitable sites South of the A40 i.e. outside the AONB and the Conservation Area. This completely ignores the recently concluded public enquiry into a proposal to develop a substantial site in Shilton Road opposite the Garden Centre and appears to be an attempt to pre-empt the decision of the Government Inspector which is expected early in 2017. If that development is permitted it will more than fulfil Burford's obligation to contribute to the increased housing requirement in the Burford-Charlbury segment. * No consideration has been given to the possibility of a development within the AONB but which avoids the intrusive and damaging effect of a development on the Site. There is land to the West of Tanners Lane (numbered 145 on the SHLAA Stage 2 map) which would afford a possible alternative. It has the advantage of being on the same side of the A361 (a trunk road plagued by HGVs) as all three of the Town's schools, the Recreation Ground and the doctors' surgery. It is flat! Access would be very much easier given a certain amount of upgrade to Tanners Lane. It is a much better proposition than the Site.</td>
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<tr>
<td>MM408</td>
<td>Board</td>
<td>Conservation Board</td>
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<td>- STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>The Board objects to the inclusion of this site for development. The site lies wholly within the AONB and as such development is contrary to Paragraphs 115 and 116 of the NPPF. The Board’s view is that alternative sites outside the AONB should be sought in order to meet housing need. Recently West Oxfordshire District Council refused a larger development outside the AONB, south of the A40 (site 146 SHLAA Stage 2 Map 5 Burford). This suggests that other sites are available in Burford for development. In light of this the Board believes that the inclusion of the site East of Burford does not conform to the 3rd bullet point of Paragraph 116 of the NPPF “…the cost of, and scope for, developing elsewhere outside the designated area…” and should be removed from the plan.</td>
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<td>MM425</td>
<td>Carterton Construction</td>
<td>Carterton Construction</td>
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<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>Point 9.6.34K You speak of the popularity of Burford leading to strong demand. Burford is popular because care has been taken in previous decades to preserve it, as a beautiful medieval town, contained in a lovely valley. Because of its popularity some of the proposed houses could be bought as second homes.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 191</td>
<td>This point talks of a “gateway entrance” to Burford and “appropriate landscaping,” which misses the whole point of the natural, beautiful valley as it approaches Burford from the A40. It is also a National cycle route and used by walkers doing the circular route to Swinbrook and Fulbrook.</td>
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Principle of the Allocation

2.56 Land east of Burford is proposed for allocation for “around 85 dwellings as a wellintegrated and logical extension of the existing built form of the town.” As discussed above in respect of main modifications 15-16, Burford is classified by the Council as a rural service centre, the second tier of settlements in the District after the three main service centres.

2.57 Within the Burford-Charlbury Sub-Area there are no main service centres, and Burford represents one of only two rural service centres in the Sub-Area, serving the wider villages and sub area. The Plan recognises that rural service centres are sustainable locations to accommodate development.

2.58 Paragraph 9.6.4 of the Plan highlights that there have been no sites allocated for residential development in Burford since the late 1980s, although it is acknowledged that some limited windfall development has occurred over this period. The Plan highlights that this, together with the desirability of Burford as a location to live, has significantly increased house prices in the town.

2.59 We support the proposed allocation of the site which will help in addressing the lack of recent supply of new housing in the locality over the Plan period through the delivery of much needed housing.

2.60 Clearly given the site's location in the AONB, due consideration must be given to the tests set out in the NPPF in this regard. The Council have clearly set out their justification in relation to the tests in proposing to allocate the site. We consider each of the tests in turn below and provide our own assessment against which supports the conclusion ultimately reached by WODC in proposing the allocation.
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.

2.61 As has been clearly established the Council has a high level of housing need and there is a need for the Council to also seek to accommodate a proportion of the unmet needs of Oxford City. We do not repeat these considerations here but clearly regard should be had to this level.

2.62 Burford is classified as a rural service centre, the second tier of settlements in the District and is ranked as the 6th most sustainable settlement in the Council’s Settlement Sustainability Report. Significant allocations are proposed at the Council’s three main service centres, and the Proposed Modifications to the Plan have sought to enhance the capacity of these locations where possible. Given the scale of development necessary to be met in the District it is plainly impossible for the full quantum of development to be met at the main service centres and this is reflected in the proposed allocations at the rural service centres and indeed other settlements further down the settlement hierarchy.

2.63 The Local Plan highlights that no allocations have been made at Burford since the late 1980s. A limited number of dwellings have been delivered through windfall development in Burford Parish however as shown by the material at Appendix One this totals only 79 new dwellings over the period 2001 to 2016. Of the total completions in Burford Parish only 28 affordable homes have been completed. As of 1st April 2016 there were 1,443 people on the Council’s Housing Register and of these 28 applications have registered Burford as their first choice of area.

2.64 Clearly therefore there is a level of need for both market and affordable housing at both a District and Parish level which necessitates the allocation of the site within the AONB. Paragraph 9.2.26 of the Plan highlights that: “the Town Council is keen to see an increase in the housing stock to provide some affordable housing to enable younger families to live in the town, secure the future of the primary school and increase the supply of key workers.”

2.65 The Plan also highlights that the development would have a beneficial effect in terms of the local economy during the construction phase. In addition we would highlight the beneficial effect the proposals would have once occupied through the support of local services and facilities. The development is well located to provide access to the services and facilities on offer within the town and the proposals will seek to link into the existing connections. Whilst Burford does benefit from a good range of services and facilities, these are somewhat reliant on the tourist trade which the town attracts, and the proposed development will help to supplement this income through the increase in resident population.

2.66 As such it is considered that the proposed allocation clearly meets this criterion. The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way

2.67 As discussed above the need for development to be accommodated at Burford has been clearly demonstrated. In considering potential locations for development around
"In terms of the scope for developing elsewhere or meeting the need in another way, the majority of Burford (except land south of the A40) is washed over by the Cotswolds AONB designation. Any development within or on the edge of the town will therefore fall within the AONB and the scope for avoiding it does not exist other than south of the A40 where the Council's assessment of land availability has been unable to find any suitable sites."

2.68 The Plan below (ATTACHED) is taken from the SHLAA (June 2014) and clearly demonstrates that the majority of potential development locations are within the AONB. Whilst one site (SHLAA reference 146) is promoted which is located outside of the AONB, proposals for development of the site have recently been refused under application reference 15/00166/OUT with the Council noting in its reasons for refusal that:

"By reason of its location, remote from the Town Centre facilities and with difficulty of access, the development would be isolated and heavily reliant on the use of private vehicles."

2.69 The refusal has been appealed and the decision is currently awaited.

Suitable alternative sites outside the AONB do not therefore exist, and the proposed allocation site is considered to be the most appropriate opportunity of those sites within the AONB, as confirmed by the Council through its draft allocation. It is considered that development of our client’s site would integrate well into the historical pattern or character of the settlement, noting the landscape character of the area. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

2.70 In proposing the allocation of the site the Council have assessed the site and concluded that "development of this site would not have a detrimental effect on the environment, landscape or any recreational opportunities." In response to the proposed allocation a planning application is in the process of being prepared for the development of the site and will be submitted in early 2017. To inform the proposals detailed technical work is underway and this informed the draft proposals which were the subject of public consultation in December 2016. A copy of the exhibition boards are provided at Appendix Two.

2.71 In summary the technical work undertaken to date has demonstrated that:

- Flooding – All new homes are on land classified as Flood Zone 1, which carries the lowest risk of flooding. New foul and surface water networks will be constructed to collect flows generated by the development. A Sustainable Drainage System will ensure that there would be no increase in flood risk to the surrounding local area.

- Heritage and Archaeology – the majority of the site is located within the Burford Conservation Area. There are a number of listed buildings located within the Conservation Area boundary. These buildings have been considered as part of.
### Detailed Allocation Requirements

2.75 As discussed above we support the principle of the allocation of land east of Burford. Notwithstanding this, we do have some comments on the detailed requirements of the policy as discussed below.

2.76 The proposed allocation seeks the delivery of around 85 dwellings. Whilst we support the recognition that the site represents an appropriate location to accommodate residential development we do consider that the site also the potential to deliver a 60 bed extra care facility within the allocation site. The care home would help to meet the local needs for such a facility in an appropriate location which is well integrated with the existing services and facilities on offer within the town. The site is capable of accommodating this alongside the 85 dwellings proposed.

2.77 As such we consider the policy wording should be amended to the following: "Land to the east of Burford to accommodate 85 dwellings and up to 60 bed extra care..."
2.78 Criterion B of the policy requires: "provision of satisfactory vehicular access and appropriate pedestrian and cycle connections. Any vehicular access provided from the Witney Road will be required to contribute positively to the eastern approach into Burford providing a ‘gateway’ entrance to the town."

2.79 The supporting text to the policy notes that there are a number of options in terms of access and that in addition to the potential for access to be taken from Witney Street (incorrectly called Witney Road in the draft policy text), secondary access could be taken from Frethern Close/Wysdom Way and Barns Lane. The emerging proposals shown on the exhibition boards at Appendix Two take primary access from Witney Street with a limited number of units served from a secondary access off Barns Lane. The application will in due course be accompanied by a detailed Transport Statement demonstrating the suitability of these access options.

2.80 Whilst the proposed access from Witney Street has paid due regard to the proposed allocation site boundary as a result of the additional technical work that has been undertaken by the consultant team it has been determined that it is not possible for the access to be achieved within the allocation boundary as currently proposed. The proposed access arrangement is shown at Appendix Three. In light of this it is considered that the allocation site boundary should be amended to reflect that shown in red below (the existing proposed allocation boundary is shown via the dashed black line).

2.81 Subject to the above suggested amendments it is considered that the proposed allocation is sound.

2.82 Our consideration of the wider opportunities presented by our client’s land interests to the east of Burford are discussed in relation to Main Modification 200 and as such are not repeated here.

Sustainability Appraisal

2.83 The proposed allocation has been subject to detailed assessment in the Sustainability Appraisal Addendum Report (October 2016) prepared by Enfusion on behalf of the Council. In relation to the four proposed new non-strategic allocations in the Burford-Charlbury Sub-Area the Report confirms that no major significant effects were identified.

2.84 The conclusions of the Report in respect of the East of Burford allocation are shown below together with our comments and updated conclusions. (Attached)
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<tr>
<td>MM17</td>
<td></td>
<td>david cohen</td>
<td>mR</td>
<td>cohen</td>
<td>20</td>
<td>MAIN 192</td>
<td>I strongly object to this planning application on “Coles Field”. The Town Council have and our district councillor have made their opinions very clear in the past and their position is unchanged. This is a green field site in an AONB area and in the Burford Conservation area in no way can it be considered as anything else having been ploughed, drilled and harvested for decades. The small development known as Falkland Close could only be built on under The Rural Exception Scheme, and the proposed development falls far short of that scheme. The entrance roads to the site are totally unsuitable, Barn Lane is a single track road with no passing places or room to create them. It is dangerous to drive on let alone walk. Frethern Close is congested at off peak times and impossible to negotiate during busy times. The road proposed to connect with Witney Street is nothing short of laughable for reasons that must have been obvious if looked at sensibly. It IS visible from approaches to Burford and would spoil an iconic view of Burford. so loved by the tens of thousands of visitors who visit Burford annually. This must be removed from the Draft Local Plan and not just used to meet government quotas without due regard to the ruination of the Town. Yours David Cohen</td>
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<td>MM425</td>
<td>Carterton Construction</td>
<td>Carterton Construction</td>
<td>-</td>
<td>Carterton Construction</td>
<td>991</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 192</td>
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"the Town Council is keen to see an increase in the housing stock to provide some affordable housing to enable younger families to live in the town, secure the future of the primary school and increase the supply of key workers."
2.65 The Plan also highlights that the development would have a beneficial effect in terms of the local economy during the construction phase. In addition we would highlight the beneficial effect the proposals would have once occupied through the support of local services and facilities. The development is well located to provide access to the services and facilities on offer within the town and the proposals will seek to link into the existing connections. Whilst Burford does benefit from a good range of services and facilities, these are somewhat reliant on the tourist trade which the town attracts, and the proposed development will help to supplement this income through the increase in resident population.

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The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way

2.67 As discussed above the need for development to be accommodated at Burford has been clearly demonstrated. In considering potential locations for development around Burford the draft Plan highlights that:

"In terms of the scope for developing elsewhere or meeting the need in another way, the majority of Burford (except land south of the A40) is washed over by the Cotswolds AONB designation. Any development within or on the edge of the town will therefore fall within the AONB and the scope for avoiding it does not exist other than south of the A40 where the Council's assessment of land availability has been unable to find any suitable sites."

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"By reason of its location, remote from the Town Centre facilities and with difficulty of access, the development would be isolated and heavily reliant on the use of private vehicles."

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Planning application is in the process of being prepared for the development of the site and will be submitted in early 2017. To inform the proposals detailed technical work is underway and this informed the draft proposals which were the subject of public consultation in December 2016. A copy of the exhibition boards are provided at Appendix Two.

2.71 In summary the technical work undertaken to date has demonstrated that:

- **Flooding** – All new homes are on land classified as Flood Zone 1, which carries the lowest risk of flooding. New foul and surface water networks will be constructed to collect flows generated by the development. A Sustainable Drainage System will ensure that there would be no increase in flood risk to the surrounding local area.

- **Heritage and Archaeology** – the majority of the site is located within the Burford Conservation Area. There are a number of listed buildings located within the Conservation Area boundary. These buildings have been considered as part of the design process, in particular the views from the site to the surrounding Conservation Area. An archaeological assessment has been carried out to identify the presence of heritage assets. This assessment has identified that there are no designated archaeological heritage assets on the site and none within 1km of the site boundary.

- **Ecology** – a number of ecological investigations have been undertaken and are ongoing in order to assess the biodiversity value of the site. The habitats within the study area assessed are considered to be of a ‘lower’ value at the local scale. Further environmental studies are taking place and the emerging proposals include strengthening the existing boundary habitat, retaining the mature trees and reducing the impacts on the development upon habitats and species present.

- **Landscape** – as has already been discussed the site falls within the Cotswold AONB and any development will therefore need to respect the qualities and character of the AONB. The site benefits from existing trees and vegetation running along the site boundaries, which would be retained and added to as part of any future proposals. A landscape scheme for the site will include public open space, green infrastructure and additional planting and screening to integrate the development to the wider area.

2.72 The proposed allocation site is currently comprised of agricultural land and will not therefore impact on any existing recreational facilities. The proposed development will deliver a new area of children's play space and wider public open space for the enjoyment of both new and existing residents.

2.73 It is considered that the development would respect and conserve, and not obstruct, public views to higher slopes or skylines or sweeping views across the landscape. The building style will respect the local tradition and be to a high standard of design as befits a nationally designated landscape.

2.74 Given the above it is considered that the proposed allocation is sound and will make an important
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contribution to meeting local needs as well as those of the wider District.

**Detailed Allocation Requirements**

2.75 As discussed above we support the principle of the allocation of land east of Burford. Notwithstanding this, we do have some comments on the detailed requirements of the policy as discussed below.

2.76 The proposed allocation seeks the delivery of around 85 dwellings. Whilst we support the recognition that the site represents an appropriate location to accommodate residential development we do consider that the site also has the potential to deliver a 60 bed extra care facility within the allocation site. The care home would help to meet the local needs for such a facility in an appropriate location which is well integrated with the existing services and facilities on offer within the town. The site is capable of accommodating this alongside the 85 dwellings proposed.

2.77 As such we consider the policy wording should be amended to the following: "Land to the east of Burford to accommodate 85 dwellings and up to 60 bed extra care facility as a well-integrated and logical extension of the existing built form of the town."

2.78 Criterion B of the policy requires: "provision of satisfactory vehicular access and appropriate pedestrian and cycle connections. Any vehicular access provided from the Witney Road will be required to contribute positively to the eastern approach into Burford providing a 'gateway' entrance to the town."

2.79 The supporting text to the policy notes that there are a number of options in terms of access and that in addition to the potential for access to be taken from Witney Street (incorrectly called Witney Road in the draft policy text), secondary access could be taken from Frethern Close/Wysdom Way and Barns Lane. The emerging proposals shown on the exhibition boards at Appendix Two take primary access from Witney Street with a limited number of units served from a secondary access off Barns Lane. The application will in due course be accompanied by a detailed Transport Statement demonstrating the suitability of these access options.

2.80 Whilst the proposed access from Witney Street has paid due regard to the proposed allocation site boundary as a result of the additional technical work that has been undertaken by the consultant team it has been determined that it is not possible for the access to be achieved within the allocation boundary as currently proposed. The proposed access arrangement is shown at Appendix Three. In light of this it is considered that the allocation site boundary should be amended to reflect that shown in red below (the existing proposed allocation boundary is shown via the dashed black line).

2.81 Subject to the above suggested amendments it is considered that the proposed allocation is sound.

2.82 Our consideration of the wider opportunities presented by our client’s land interests to the east of Burford are discussed in relation to Main Modification 200 and as such are not repeated here.
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| MM451        | English Heritage         | Historic England| Mr               | Small             | 1098       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Sustainability Appraisal

2.83 The proposed allocation has been subject to detailed assessment in the Sustainability Appraisal Addendum Report (October 2016) prepared by Enfusion on behalf of the Council. In relation to the four proposed new non-strategic allocations in the Burford-Charlbury Sub-Area the Report confirms that no major significant effects were identified.

2.84 The conclusions of the Report in respect of the East of Burford allocation are shown below together with our comments and updated conclusions. (Attached)

This site is within the Burford Conservation Area. Nevertheless, Historic England considers that the development of the majority of this site to the west is acceptable but is concerned about the triangle of allocated land to the north-east. The approach to Burford from the east is particularly rural, which makes a valuable contribution to the special interest, character and appearance of the conservation area.

As a designated heritage asset, great weight should be given to the conservation of the Conservation Area in accordance with paragraphs 126 and 132 of the National Planning Policy Framework. Any development of this site should therefore conserve or enhance the special interest, character and appearance of the Conservation Area.

It is noted that it is proposed to have the principal vehicle access to the site in this north-east corner and that the development of this site is considered to present an opportunity to provide a “gateway” entrance to Burford from the east. However, as noted above, the existing rural approach to Burford is an attractive feature that contributes to the conservation area. We therefore consider that a “gateway” feature is both unnecessary and damaging to the character and appearance of the Conservation Area and object to this element of the proposals.

If it is not possible to access the site entirely from Frethern Close/Wysdom Way we would prefer to see this allocation dropped from the Plan. If, however, the Council considers that the public benefits of the development of the site could outweigh the harm to the Conservation Area, the proposed access should be kept as low-key as possible with no development either side in this corner of the site.

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MM461 | John H Bayliss | Mr | Bayliss | 1138 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | As a native of the Cotswolds, and having had a home in Burford for many years, I wish to comment on the recent Planning Application for 85 family homes, as referred to in a recent paper issued by the Burford Town Council, a copy of which I assume you have received.

From a professional background, I feel it would be an excellent addition to the property requirements of Burford Town centre and the site occupies a logical extension to the existing residential development. Therefore, I strongly disagree with the Town Council’s view that, “it will propose to object strenuously to this proposal” on 6 counts, as set out in its paper. Although not referred to in its paper, I have been advised that at the Town Council Meeting on the 8th December, it was felt that a more appropriate site for 85 dwellings was on land at the beginning of Tanners Lane, immediately adjoining the main A40, which carries a high volume of fast traffic between Cheltenham and Oxford. In my opinion, such a proposal is totally inappropriate. Also, the entrance to such a development would be almost facing the entrance to the very active Burford School, which has an increasing number of pupils.

Moreover, 85 dwellings would produce approximately 130 - 170 additional vehicles, turning the very narrow Tanners Lane into a "rat-run" down the steep hill into Sheep Street, thus producing a further hazard to people using the recreation ground and the recently proposed additional facilities at the top of Tanners Lane.
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| MM464         |                         | Laura Morris          | Ms               | Morris            | 1153       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193                     | As a Fellow of the Chartered Institute of Building, I am perplexed by the actions of the Town Council in putting extreme pressure on your department by supporting the massive planning application for the proposed development fronting Shilton Road, which would be fraught with problems, particularly by very serious traffic congestion onto the A40. This argument was so ably demonstrated by the sincere and caring objections raised by the Shilton Road Residents' Association. Therefore, it is not logical for a responsible Town Council to support the Shilton Road site with its massive ramifications and yet object to the proposed development of Cole's Field and suggesting, as an alternative, the Tanners Lane Site. In my consultancy work, I expect to experience respect, common sense and logical thought. The Town Council would appear to be driven by a "hidden agenda".  

We understand the need for houses but such a huge development would now endanger the hundreds of years of effort by so many to keep this unique medieval town a very special place. Tourists flood into Burford from all over the world to see our town and the traffic problem with the huge lorries is really out of control and strain on the bridge is too terrible to think of what could happen there.  

85 more houses added onto an area that has REALLY Outstanding Natural beauty and surely in this terrible current world everyone should always be able to admire the views of the Church Spire and Windrush Valley from the A40. Anyone who loves Burford, lives there, visits etc., approach and see those views it is one of the rare sights of Old England. We always feel a sense of pride as we see those special unique views. You must have received hundreds of letters such as mine but there is no other town like Burford and surely there must be another area close by where a developer can make his profit without taking away this piece of history from a mad and disturbed world!!  

In all the towns in all the world, we chose Burford to buy our second home. We stopped for a coffee when visiting The Cotswolds, on returning we found a cottage for sale on the internet and paid our deposit before even seeing the home inside, as we knew what a special place it was. If these fields are used for anything, should a road to by pass Burford for all the heavy traffic not be considered. This way our bridge could be rescued and the dangerous traffic loads reduced. 85 houses could potentially create another 160 cars using this main road if everyone home had two cars. We think this is a very unique decision for the planners when there just are not towns like Burford and surely our future generations and worldwide visitors deserve to keep this Jewel in the Crown without building on its beautiful surroundings countryside, causing more conjestion and spoling what can never ever ever be reproduced.  

We love to see the Chinese, Japanese, Americans, Europeans coming to our town from so far. Surely they must be excited as they approach Burford, see the valley with the river and the Church Spire. How could anyone wish to replace this with a housing estate? So many fields elsewhere. Surely a similar building project could be built close by where it won't take away this rare scenery or choke the heart of an already busy little town (that just about seems to work now but so many more homes could 'rock the boat' and endanger the livelihood of so many businesses in Burford should the tourists stop coming).  

Thank you for your time to read my thoughts. Just hope, when I am sure you read letters of objections every day, that Burford, its beauty and history will be given special considation as it must be one of the most special places left, anywhere.                                                                                                                                  |
| MM465         |                         | Laurence adn Penny Maddock | Mr and Mrs | Maddock          | 1157       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury                                      | Proposed development of 85 house sat Cole's Field on the eastern boundary of Burford, bordered by the houses of Orchard Riseto the north, Frethern Close to the south and Barns Lane to the West.  

We are writing to expressour concern about the proposed development on the land to the east of Burford, being Cole's Field, between Witney Street, Frethern Close and Barns Lane. This site has previously been investigated for affordable housing and was rejected by WODC planners and County Highways, and so we...
When we bought our property in Frethern Close approximately 10 years ago, our searches confirmed that Cole’s Field lies within not only an Area of Outstanding Natural Beauty but also a conservation Area. As such, it was considered virtually sacrosanct from a development point of view. This information played a very important part in our decision to buy our property. We are therefore not only distressed, but exceptionally disappointed to find that the conservation and AONB designations appear capable of being swept aside by WODC.

From a purely aesthetic perspective there is an iconic view down to the church and the Windrush Valley from the top of this field, able to be viewed from the A40 coming from the west, the A361 driving from Chipping Norton and from the A424 driving from Stow on the Wold. We have many walkers around Burford and this particular view would be ruined to those using the Westhall Hill footpaths and the circular route through Fulbrook, Widford or Swinbrook back to Burford car park. It is views such as this that bring the thousands of visitors we have in Burford year after year. Any development on this site is bound to have an effect on tourism, which is the lifeblood of the town. In addition, you have made no mention of the Grade I listed St John the Baptist Church and the Grade II Great House, both of which are set against the sight line of this field, together with listed buildings in the High Street. We have over 250 listed buildings in Burford and a development of this size is bound to have a detrimental effect on the view of Burford from several directions.

There is also a lot of wildlife to be seen regularly in the field, including roe deer, muntjac deer, foxes, rabbits, pheasants, peacocks and hedgehogs. Hedgehogs in particular are now a highly endangered species and yet they proliferate in this Field, along with frogs and newts. Clearly, any development will have an extremely deleterious effect on the habitat of these animals. In addition to which, there are a number of cats from surrounding houses which roam freely around the field. We dread to think how many animals will die as a result of development of this land.

It does not appear to us that a proper survey of the field can have been carried out since your plan says that the land slopes gently down to Witney Street, whereas it is clear to see that in fact the slope is very steep. In addition, your plan states that there is no flood risk, whereas anyone in Burford will tell you that Witney Street regularly floods from rainwater pouring down the slope from the field and also from the natural springs on the site. Orchard Rise will also be endangered by flooding since it is cut into the hillside such that roof levels are even with the lower edge of the proposed site. Flooding already occurs in Barns Lane and from Barns Lane into The Lodge in Pitts Lane and Swan Lane Close during periods of heavy rainfall.

Your plan also states that there are three suitable access points to the site - Frethern Close/Wysdom Way, Barns Lane and Witney Road (sic - this should of course be Witney Street). The purported access in Frethern Close/Wysdom Way is tiny and totally unsuitable for such an accessway. We have already seen a highly increased volume of vehicular and foot traffic on these two roads since the development of the land on the A40 and this has resulted in people driving at excessive speeds, increased litter and dog excrement on the pavements and roads, which had not been noticed previously. As to Barns Lane, the proposed access has very little visibility and will be exceedingly dangerous. Barns Lane is already used as a rat run by people trying to avoid the general gridlock that occurs in the High Street as the traffic backs up from the bottleneck of the bridge over the Windrush. If anyone from the WODC has ever driven along Witney Street to Burford, they will know that it is narrow and made dangerous by cars speeding along it. It is generally considered a death trap and we are shocked that you would consider it a suitable access. Your plan does not state how the estate would be sign posted from Oxford, but presumably down the Widford turn from the A40, which would be an undeniably dangerous route.
Your plan states that the building work will create construction jobs, but this is a short term effect only. With 85 houses, where are these people going to work? There are few job opportunities in the local area, so are we going to end up with people in these houses increasingly depending on benefits to sustain them?

We understand that the infrastructure in Burford is already straining to support the population and worry that it will be forced to breaking point, which will mean more expense. You have also mentioned in the plan that more housing will mean more children attending the local schools, thus making their continued existence safer. Burford School already relies heavily on fund raising to provide fundamental requirements such as classroom chairs, new toilet facilities and refurbishment of the kitchen equipment. We cannot understand how more children attending will not exacerbate these problems. Burford Library has fended off closure by rallying volunteers and is continually fund raising to avoid closure. Burford residents are always extremely generous, even when they may have no connection with the subject of the fund raising. However, we wonder whether WODC should be putting right the needs of Burford currently rather than increasing the number of residents who will be affected by these problems.

Finally, we are disappointed at the lack of consultation WODC has had with Burford Town Council. We have been advised that no prior consultation was undertaken with the local councillor or the town council before writing to the affected owners and occupiers in Burford. This does not lead us to trust the system that we believed to be in place, and thus to not trust that our views regarding this proposed development will count for anything. We sincerely hope that is not the case. For all the reasons above we cannot object strongly enough to this proposed development.

We are writing to you to express our objections and concerns to the draft plan to allocate land to the east of Burford for a potential development of 85 new houses. My key objections are on the grounds of the errors of the plan; the impractical sightings of access points; and the safety of residents and visitors.

1. Errors.
   • There was no prior consultation on the plan with our local WODC councillor (Derek Cotterill); with the Town Council; or with Cotswold Conservation Board or Historic England.
   • The site is in the Cotswold AONB where previously no major development has been allowed.
   • Contrary to statements within the draft plan, the site is clearly visible from the town and its surrounds
   • The previous draft local plan said that “the development potential of land surrounding Burford is heavily constrained by the sensitivity of the landscape although there may be some scope for a small-scale extension of the built-up area”. This has been struck through in the new draft with no explanation as to why this is so.

2. Impractical.

The draft plan is not correct when it states that the site slopes “gently down towards the north-east corner and the Witney Road”. In fact, the slope is very steep down( at least 5 metres) to the proposed access point on Witney Street and would require an enormous excavation of earthworks

• The site also falls steeply down to the houses to the north. Any development would bring the serious risk of flooding to dwellings in Orchard Rise, Windrush Close, Swan Lane and down as far as Witney Street. All such premises narrowly escaped serious flooding in 2007 because the (arable field) site was able to absorb most of the significant rainfall in that year. Our own experience from when Orchard Rise was built, both of our garden walls were pushed by the properties above and at a huge expense to ourselves to repair. More properties put
above Witney St may exacerbate the problem:


- The draft plan indicates that the main vehicle access to the site would be from Witney Street (aka the Witney Road in the draft plan) and this road would become a main gateway to Burford from the A40 and to the east.

- Leaving the A40 from the east into the so-called Witney Road (White Hill) is a major safety hazard for drivers, particularly at night and in poor visibility. The junction is difficult to see and at peak times and any vehicle can wait up to 10 minutes in the middle of the carriageway with vehicles passing closely on both sides at 50+ mph. We have experienced on many occasions, if a lorry is passing, vibration does occur and will rock our car to left and right.

- The Witney Road is a very narrow, unclassified road that experiences flooding, severe icing and fog pockets in the winter as it’s close to the River Windrush. Numerous accidents have occurred along this road and particularly through the winter.

- It is very popular with walkers and cyclists. It is part of the popular circular walk around Burford and on the National Cycle route (57)

- Vehicle access to the site from the north, south or west would also be complicated. The options appear to be:

  i. maneuvering through the centre of Burford with several turns, narrow roads and busy traffic (particularly in the summer months)

  ii. using Barns Lane which is narrow and steep and has no footpaths at its lower end. It also has many parked cars and is a twice-daily route for children and parents walking to the local primary and secondary schools

  iii. passing Burford on the A40 and doing a difficult 270 degree turn into the east end of the Witney Road near the Ramping Cat Nursing Home.

  iv. The bend coming into Burford from White Hill is very sharp (the map indicates it’s a gentle curve) and the 2 proposed access points onto Witney St will not allow enough time for vehicles to exit these junctions.

  v. At peak times cars have sped in excess of 60” miles per hour coming down from White Hill into Burford.

  vi. On busy weekends and in the summer, the cars are parked both sides of the road along Witney St up to the very sharp bend leading its share of new houses to meet local needs. It should not bring more Oxford commuters that would add further traffic at peak times to the busy A40.

  vii.

The previous draft plan also identified further possible sites in Burford at Tanners Lane, Burford Cottage Hospital and on the land to the south of Sheep Street. It is not clear why these have been deleted from the Plan. It is also unclear whether serious thought has been given to flat land on the south side of the A40 (which is outside the AONB and not in sight from the north).
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<td>MM469</td>
<td></td>
<td>Maureen Percival</td>
<td>Mrs</td>
<td>Percival</td>
<td>1170</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>Please take account of these objections as part of your further drafting of the Plan.</td>
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<td>Local Plan 2031 The Burford-Charlbury Segment</td>
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<td>I am writing to object most strongly to the proposal to build 85 houses to the land east of Burford known as Coles Field.</td>
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<td>My objection is based on the following:</td>
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<td>The concept of making access to the proposed development from Witney Street is both dangerous and impractical. Not only are there weight restrictions on this road but more importantly, it is well recognised and acknowledged by all who know the area, that the layout of this stretch of road is dangerous, causing numerous accidents in all weathers at all times of year. Indeed, in the past there has been a fatal accident. The road is too narrow, with many bends and tricky gradients. In adverse icy conditions many locals will take a detour travelling towards the A40, rather than tackle the Eastern end of Witney Street known as White Hill.</td>
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<td>In addition, the water run-off from the steep hill in Coles Field often causes flooding and at times ice in Witney Street, making driving very hazardous.</td>
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<td>The two alternative access proposals are equally impractical in that the access roads are far too narrow to allow safe two-way traffic. Coles Hill</td>
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<td>The proposed site does not 'slope gently' but falls very steeply towards the River Windrush. When it rains water gushes across Witney Street down the drive that approaches my property. This is currently held in abeyance - just by drains placed at the top of the driveway, but any building on Coles Field will adversely affect the water flow from the natural springs and, in addition to rain water, could make flooding of my property an inevitability.</td>
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<td>Burford sits within an Area of Outstanding Beauty. The proposal to build these 85 properties in Coles Hill would devastate the views of the town and destroy the character of the countryside. The proposed access road onto Witney Street would involve a deep cutting totally averse to the area's character.</td>
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<td>For the above reasons, I would urge you to reconsider and reject the proposed plan to build up to 85 houses on Coles Field.</td>
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<td>MM471</td>
<td>R M Tarbox</td>
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<td>Tarbox</td>
<td></td>
<td>1172</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>West Oxfordshire draft local plan - policy no. BC1b - land east of Burford</td>
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<td>I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field</td>
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<td>My objection is on the following grounds:</td>
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<td>1. The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.</td>
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We wish to object to the proposal to allocate 85 new homes and an extra care facility on the site to the east of Burford, known as Cole’s Field.

Our objection is on the following grounds:

1. The site access proposals are not acceptable and would lead to potential safety hazards. The draft plan says that primary vehicular access would be through Witney Street. Witney Street is a narrow country lane which already suffers from congestion and speeding vehicles. The main entrance to the proposed site would be right next to the double bend which is particularly hazardous. The road frequently floods and freezes during winter.

   The plan goes on to state that secondary vehicular access may be achieved from Frethern Close/Wysdom Way to the south and Barns Lane to the East, both of these options are entirely unsuitable. The roads are already full of parked cars; Frethern Close in particular is extremely difficult to negotiate in a car if there is another vehicle travelling in the opposite direction. This already causes difficulties for emergency services, refuse lorries and delivery vans. Barns Lane also has its own traffic issues. There have been a number of occasions recently where lorries have become stuck, occasionally causing damage to walls. This highlights the unsuitability of this road as an access point.

   Extra traffic through any of these routes is not acceptable. A development of 85 new homes would bring at least double that number of cars, plus more cars working at and visiting the proposed care facility. The town simply cannot cope with this level of traffic; it would create road safety problems and cause difficulties for the emergency services.

2. Cole’s Field, and its access through Barnes Lane, is used as a right of way and should be recorded as such under section 31 of the Highways Act 1980. People use the Barns Lane entrance and the edge of the field to access the rear of the properties in Barns Lane, Frethern Close and Wysdom Way; they walk along this route with their families and they walk their dogs. We have used this route since moving to Burford in 1969 and it is still regularly used, by ourselves and others, today.

3. Cole’s Field is a vibrant living landscape which underpins the health and wellbeing of the surrounding residents. Its value is immeasurable. It is where children play, families walk, pets and wildlife run free. It
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<td>MM476</td>
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<td>Roger Lofthouse</td>
<td>-</td>
<td>Lofthouse</td>
<td>1197</td>
<td>West Oxfordshire Draft Local Plan BC1B-Land East of Burford</td>
<td>I wish to object to the draft plan to allocate 85 New Homes on the site of east Burford known currently Cole's Field. My objection is as follows: There has been no prior consultation with either Burford Town Council, our district councillor, AONB. There is no suitable access. Witney Street is narrow lane subject to icing at the top and flooding at the bottom bending sharply at the proposed access point. Barns Lane and Frethern Close are already struggling to cope with the vehicles parked there. The proposed site is within the Cotswold Area of Outstanding Natural Beauty.</td>
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<td>MM477</td>
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<td>Reg Marshall</td>
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<td>Marshall</td>
<td>1198</td>
<td>West Oxfordshire Draft Local Plan - Policy No. BC1b - Land East of Burford</td>
<td>We wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the East of Burford known as Cole's Field. We strongly object because:- 1. The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character. 2. As a minimum estimate the proposed development would increase Burford's population by 25%. This would completely destroy the character and make-up of the town and potentially loose its attractiveness to the tourists who enable businesses in the town to trade. 3. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from</td>
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<td>MM478</td>
<td>Peter Martin</td>
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<td>Martin</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>Suggested development of Cole's Field, Burford</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I am writing to express my objections to the suggested idea of building 85 dwellings on Cole's Field.</td>
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<td>I appreciate that you are charged with identifying new opportunities for increasing the supply of private dwellings which cannot be easy, but I really do feel that in this instance, Cole's Field is not sound for many reasons, which include:</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>• The inadequacy of the infrastructure support e.g. the road are not suitable for all the extra traffic</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>• The fact that Witney Street regularly floods due to the deluge of water that runs down the Cole's Field hill.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>• Such a large development is totally disproportionate to the size of Burford – which factually is a town but in reality is more the size of a village.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>• The fact that this building is being proposed in an Area of Outstanding Natural Beauty and it would permanently obscure some wonderful views across the magnificent Windrush Valley.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>• There are alternative sites currently being considered in Burford on Shilton Road which would have none of the above problems.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I urge you not to allow this suggestion to proceed any further. Thank you.</td>
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<tr>
<td>MM11</td>
<td>John White</td>
<td>Mayor</td>
<td>White</td>
<td>12</td>
<td>Local Plan 2031- Burford - Charlbury Segment</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>The Plan professes to ban the erosion of the Cotswold Area of Outstanding Natural Beauty. It then recommends a development of 85 homes on the Eastern Boundary of Burford. Such a direct contradiction renders the Plan unsound</td>
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<tr>
<td>MM479</td>
<td>Dr KWGray</td>
<td>Dr</td>
<td>Gray</td>
<td>1200</td>
<td>Local Plan 2031- Burford - Charlbury Segment</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>Consultation Response to WODC Local Plan</td>
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Oxford and the A424 coming from Stow; the views which fully justify the area's inclusion in the AONB classification.

4. There was no prior consultation with Burford Town Council, our District Councillor or the body which manages the AONB.

5. The site slopes steeply to the North and there is a clear risk of flooding.

6. There is no suitable access. Witney Street is a narrow country lane which is unsuitable for widening. It is also prone to icing up at the top, flooding at the bottom and it bends sharply at the proposed access point. Frettern Close and Barns Lane are also narrow and impossible to widen. These roads are choked by parked cars, and making it hazardous for people to walk to the shops from the existing developments on the Eastern side of Burford.

We sincerely hope that you will take serious note of the objections above and exclude the proposed allocation.
1. WODC state in the draft Local Plan, para 9.340, that the Council’s assessment of land availability has been unable to find any suitable sites south of the A40 for building the necessary houses to meet the housing needs laid down. The Plan cannot ignore what is happening in the real world. It would be an error to not mention the public enquiry on a housing site in Burford south of the A40. If WaDe do not include it in the plan I may call for a Judicial Review. As WODC are fully aware there has been a lengthy public inquiry about a planning proposal on the Shilton Road site with a proposed 169 dwellings. A decision from the Government Inspector is expected early in 2017. If this is approved then it is no need for house building on the Cole’s Field to meet externally imposed housing demands. Allowing both sites to be approved would be an absolute disaster for Burford and should be rejected out of hand.

2. We are totally against the inclusion of the Cole’s Field as a site for house building in the Plan (para BC1b) which would increase the number of houses in Burford by almost 20%:

- The site is in an AONB and a Conservation Area should be protected from housing demand if it distracts from its tourist attraction, which the 85 Cole’s Field houses will do
- The site is unsuitable for housebuilding, being on a steep slope to the north
- There is no suitable access. Barns Lane is very narrow, Witney Street is a country road and both are choked with parked cars to have a single lane of traffic.
- With 85 homes they will overload the infrastructure; schools, doctors’ surgery, sewers, roads along with the proposed additional care home
- The Coles Field site would savagely damage the views of Burford, of the church and medieval buildings from the A40, similarly across the Windrush Valley from the A324 from Stow and from Fulbrook, radically changing the views character. The Tourism business (0.5million pa) of Burford generates about £15m per annum and is its lifeblood. They come for the views, the medieval buildings etc and the Cole’s Field development will ruin these. The arguments in PC1b of the Plan as regarding landscaping are specious
- Burford’s businesses presently finds its workforce from the existing population and does not need more housing
- Changes to para 9:26 should be
  - The development potential of land surrounding Burford is heavily constrained by the sensitivity of the landscape
  - Paragraphs 9.6.34j-q should be removed from Draft Plan

I am writing to outline my objections to the inclusion in the draft local plan of the proposal to construct 85 new houses on the site of Cole’s Field east of Burford. Burford is a small settlement of considerable historic interest. The construction of 85 new properties adjacent to the medieval town, which comprises some 250 listed buildings, would constitute a serious desecration of our heritage.

Views of the old town, a conservation area within an AONB would be ruined from the north and east. The view from Fulbrook hill, a popular walk, would be horrendous. Burford’s appeal as a tourist “Honey Pot” would inevitably be reduced. The architectural context of the grade 1 listed church of St John the Baptist, a
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<tr>
<td>MM481</td>
<td></td>
<td>Jenny Sparrowhawk</td>
<td>-</td>
<td>Sparrowhawk</td>
<td>1206</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
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<tr>
<td>MM482</td>
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<td>Ken Sparrowhawk</td>
<td>-</td>
<td>Sparrowhawk</td>
<td>1207</td>
<td>&gt; SECTION 9 - STRATEGY</td>
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I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field.

My objection is on the following grounds:

1. The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.
   * It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow
   * There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB
   * The site slopes steeply to the north and there is a clear risk of flooding.
   * There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars.
   * My cottage has one spring for domestic water supply and another supplying my heat pump. This development may affect the quality and volume of my spring water, how will my water supply be safeguarded?
   * This road is hugely popular for dog walkers, groups of walkers, and families heading down to the path alongside the Windrush. Many of us have witnessed near misses along this stretch of the road. We do not need more traffic using this back road. When the fields are very muddy tourists often walk in the road from Widford back into Burford. The footpath ends at the first stile as you leave Burford.
   * This is also a very popular cycle route, the road is not wide enough for a cyclist and two cars passing. Pods of cycles are now a frequent feature with the squeal of brakes often heard from my property when cars approach too quickly.
   * Looking from my drive towards Burford there is a bend obscuring my view of the road. I have to enter and exit my property with great caution.

The site entrance would have similar visual problems, potentially a hazard for all of us.
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<tr>
<td>AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>Burford</td>
<td>Dear Sirs,</td>
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<td>I am writing to raise my objections to the proposed inclusion of land to the east of Burford in the local plan for housing. Having lived for many years in Burford along Witney Street east of the proposed site I have first-hand experience of the impact this will have on road users, the surrounding site residents and the environment.</td>
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<td>I have broken my points into specific areas of importance for you to consider when looking at this site.</td>
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<td></td>
<td>Cole’s Field.</td>
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<td>1. Currently arable land with a high level of drainage into the substructure feeding the many springs along the valley. Housing will upset this and concentrate the drainage into a ribbon to the north above Orchard rise with unknown consequences. There is already subsidence in this area.</td>
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<td>2 The residents of Witney Street east of which I am one, are on spring water as our only supply of fresh water which could easily be affected by the development and surface water runoff. What guarantees are there regarding the purity of our drinking supply and sustaining the volume required for our domestic water requirements and spring fed heat pump heating?</td>
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<td>3 The additional light pollution caused by the concentration of houses proposed will be seen as you approach Burford from the North.</td>
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<td>4 Burford has a problem dealing with present sewage disposal. The system could not cope with this development.</td>
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<td>Access Roads to the site.</td>
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<td>As indicated there are three access points to the site, Barnes Lane, Frethern and Witney Street. The first two are already narrow and congested and would not cater for such a large development. This leaves Witney Street as the main access road to and from the site. If we consider the proposal by Carterton Construction Ltd as typical of the type of scheme which WaDC planning will have to consider there are real issues which need to be addressed.</td>
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<td>1 Access via Witney Street has many issues which I understand the Highways have raised previously and rejected earlier proposed development.</td>
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<td>2 The gradient to Cole’s field is very steep with a vertical drop off from the field of nearly 3 meters at the proposed junction. The solution offered by Carterton Construction is to cut deep into the bank and creating a sunken road at an acceptable slope. Witney Street is a frost pocket particularly along this stretch which at times is only passable in a 4x4. The link road facing north would end up as an ice rink and a danger to the residents. There are large trees at the proposed junction with Witney Street and high banks which will prevent any rising sun reaching the road. This is why there is a permanent frost sign at both ends of the road.</td>
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<td>3 The proposed junction is visible from the west with traffic travelling at 30mph, but from the east there is a long curved bend starting from our Cottage and finishing just before the proposed junction. A car travelling at 40mph takes 36m to stop but at 60 mph it requires 73m in perfect conditions.</td>
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| MM483         |                         | Stven Elvidge  | -                | Elvidge           | 1208       | West Oxfordshire Draft Local Plan - Policy No. BC1b - land east of Burford | Adding a junction close to this bend when cars will be trying to exit or waiting to enter will end up with accidents. This rural road is narrow with a high bank

2 Adding more cars and delivery vehicles down White Hill will increase the potential for a serious accident on what is a rural back road into Burford.

The new residents working west and north of Burford will add to the congestion on the High Street junction and have to negotiate their way through the narrow streets of Church Lane and Guildenford before entering Witney Street.

3 Have the Highways Department been consulted on the feasibility of increased traffic to and from the A40? At times it is extremely hazardous when trying to negotiate turning off and joining traffic at this junction.

Farming access

Currently the Coles Field and the fields beyond are accessed via Barns Lane. Will Witney Street be opened up to farm machinery? Associated mud on the road surface is also a hazard.

I hope as a responsible authority you will take on board my concerns and reconsider the proposed plan to allow 85 houses on Cole’s Field east of Burford.

Burford is an important medieval town visited by tourists from all parts of the world and in an area of outstanding beauty which would be greatly affected if a gateway from the east were opened up, with the inevitable pressure to build even more houses to the east.

Cole’s Field is vital for absorbing rainwater and in stopping more flooding in Swans Lane, Windrush Close and Witney St. This site is not “gently sloping” but is in fact very steep and, during heavy rain, water pours down Barns Lane and into Swans Lane, Windrush Close and Witney St. The storm drains do not cope with all this rainwater now so if Cole’s Field is developed this situation will get much, much worse.

Witney Street coming from the A40 is already a death trap. Its madness to propose that Witney St. becomes the “main gateway” into Burford from Oxford. White Hill is notoriously icy with a bad bend at the bottom, a length of the road always floods in winter and the proposed access to this suggested development is on a blind bend! My children walk to school along Witney St. and have to cross this road to keep on pavements and this is a huge safety issue.
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| MM484         |                         | Susan Brguss    | -                | Barguss           | 1209       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I would be grateful if due consideration could be given to my objections. This is not a suitable site for development and I request that it is not included in the Draft Local Plan.

West Oxfordshire draft local plan - policy no. BC1b - land east of Burford

I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole's Field.

My objection is on the following grounds (being a resident of Witney Street for 33 years and Burford for over 40 years):

Access to this development is unrealistic

Approaching Cole’s Field via Witney Road White Hill is a well known accident area and one fatality in my time on Witney Street. Every year cars come to grief on this hill and it is a frequent event for cars to end up in the field at the bottom of the hill. In icy conditions I do not use this road to my home on Witney Street (or the route down Pytts Lane, a continuation of Barns Lane) as it becomes so treacherous.

The only route for me to use is up Guildenford (passed the church and up the hill to Witney Street) which is choked by parked cars.

Flooding along Witney Road

This road floods after heavy rain and when the water meadows fill up, exacerbated by numerous springs and the runoff from the hill below the A40.

Drainage

Turley Consultation Team informed us that drains would be put in to take surplus water away, where would these drains go to? Where the intended entrance to this site is the land drops away from the road down to the river very steeply and the land is always waterlogged. These drains would have to be taken a long way from this very wet area. The houses on Orchard Rise already complain about having very wet gardens, the prospect of this development must be of great concern to these residents and the homes below them.

Bends in the road

Close to the entrance of the new development there are a series of bad bends, this is also a dangerous area with cars coming to grief here, Ken Sparrowhawk’s wall bears witness to this!

During the winter months when the sun is low in the sky one is blinded by the sun when driving out of Burford round the first bend, this is also a time when the road could be icy.

There are always pot holes to be avoided.

Entrances from Roebuck Cottage, Spring Cottage and Springfield House are at these bends which adds extra danger to these residents pulling out from their properties as cars drive too fast along this road.

The footpath along this stretch gets very muddy as it is no longer maintained and it is often easier to walk along the road in these conditions 85 new homes and a care home, how many extra cars will be using this...
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| MM485         | Roy and Wendy Hill       | -               | Hill             |                   | 1210       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | LOCAL PLAN - Proposed inclusion of Cole's Field  
We write to object strongly to the above proposal. There are many reasons for this, not least being the lack of suitable access; the risk of exacerbating the existing flooding of Witney Road; and the likely complete breakdown of the existing sewage system (which is barely capable of coping with the existing demand).  
However our main concern is that:  
We have lived in this area for many years and have come to love Burford in particular. You will be aware that it is a small medieval town with many local businesses which provide excellent services to residents and visitors. This proposal would mean further erosion of this charming Cotswold town and the increased demand is likely to put unreasonable pressure on local traders and services. This will almost certainly result in the incursion of multi-national companies to meet the increased demand. In our view it would not be long before the whole character of Burford is changed beyond recognition. We should not do anything which will ultimately destroy this important heritage site. We recognise that additional housing is required but we feel this should be in more appropriate areas which can provide local jobs; cater for the increased demand on services; and hasthe necessary infrastructure to reduce the transport impact on local roads and the overloaded A40.  
This is not a case of NIMBYism but a plea to the Council to rethink their proposal and recognise that we need to preserve this historic town as it is. |
| MM488         | June Hall                | -               | Hall             |                   | 1216       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | West Oxfordshire draft local plan - policy no.BClb -land east of Burford  
I am writing to object to the proposal within the draft local plan to allocate land to the east of Burford (Cole's Field) for the proposed development of 85 houses. My key objections are as follows:-  
1. It is within an Area of Outstanding Natural Beauty and the Burford Conservation Area yet no prior consultation has been made with the body that manages the AONB. Burford's economy is based on it being a major tourist attraction within west Oxfordshire and I believe this proposal would significantly alter the town’s character and is a reversal of previous policies.  
2. The draft plan (9.6.341) states that the proposed site is 'relatively well-screened from wider views'. This is not the case. Any development of Cole's Field would clearly be seen when travelling south down the A361 and A429, and west down the A40 and from there down Witney Street towards Burford, where the view of the Parish Church is prominent. This area is an attraction for walkers, particularly those taking the circular route |
3. The draft plan contemplates that the main vehicular access to the site would be from Witney Street. There are serious problems with such a plan, namely:– It is an unclassified road that experiences flooding, severe icing and fog pockets in the winter months.

Leaving the A40 westbound down Witney Street is a major hazard for drivers, particularly when it is dark and there is poor visibility. Having spent some years travelling down the A40 on my way home from working in Oxford, I always avoided turning right at that intersection when it was dark, preferring to continue on the A40 into Burford. At such times, the junction is difficult to see, the road is relatively narrow and there is a risk of being nudged by cars from behind into oncoming traffic travelling east at speeds of 50 mph.

Witney Street is part of the National Cycle Route (57) with a large and increasing number of cyclists, riding individually or in groups. Any increase in traffic along this road would prove hazardous not only to cyclists but to walkers (and dog walkers) as there is no footpath on a long stretch of this road.

The residential area of Witney Street is congested with vehicles parked on the road.

4. The northern end of Barns Lane is a narrow lane with no footpath and only enough room for vehicles travelling in one direction. The junction between Barns Lane and Swan Lane can be very icy in winter months. Further along, southwards, this lane is choked with cars parked on the road and there is a sharp bend leading up to the A40.

5. The draft plan states that the site slopes 'gently down towards the north-east corner and the Witney Road'. This is not the case; it is very steep towards the proposed access to Witney Street and also down to the houses on Orchard Rise where the level of the field is the same height as the rooftops. There are many natural springs on the site and any development of the field would increase the probability of flooding down the slope into both the gardens of these houses and further down into Windrush Close and Witney Street. In the past, problems caused by heavy rainfall have been limited only because the field has been able to absorb a significant amount of water. This, no doubt, would have been highlighted if the Council had seen fit to carry out a proper survey.

6. A letter, received from Burford Town Council, states that there was 'no prior consultation with Burford Town Council' regarding the proposed development. I find this statement incomprehensible. Why does WODC see fit not to involve locally elected members of the Town Council?

7. Apparently, the previous draft proposal identified further possible sites, including Tanners lane, Burford Cottage Hospital, land south of Sheep Street and land south of Milton Road, Shipton under-Wychwood. Are these no longer seen as viable options? If so, why not?

8. It would appear that the main reason that Cole’s Field is being proposed for redevelopment is to cater for commuters, working in Oxford, and their families. Such needs could be facilitated from elsewhere in West Oxfordshire where road/rail networks are far better, rather than by adding to the congestion on the A40.
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<tr>
<td>MM492</td>
<td></td>
<td>A. J. T. Bond</td>
<td>Mrs</td>
<td>Bond</td>
<td>1229</td>
<td>Charlbury Sub Area &gt; MAIN 193</td>
<td>We wish to voice our objection to the inclusion in the draft Local Plan of the proposal to include 85 new homes on Cole’s Field, Burford for the following reasons:</td>
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<td>* Burford is in an Area of Outstanding Natural Beauty and this site is also within the Burford Conservation Area. 85 new houses will have a huge impact on the town, visually and also to its infrastructure - schools, doctors and roads. 85 new houses could mean 170 more cars! As we all know, Burford’s roads are a nightmare already! 85 new houses could mean 170 more children - how can our much-loved schools cope with that influx? We already have to wait for weeks for a non-urgent appointment at the Doctors and this will only get worse with 85 more houses. Burford is a medieval town - how will its sewage system cope?</td>
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<td>* The visual impact of Burford as you approach from both the East and the North will be destroyed. Burford attracts many tourists and money into the area and we change the look of this historic town at our peril. Once the views across the Windrush Valley are changed they are changed forever!</td>
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<td>* There was no prior consultation with Burford Town Council who are vehemently opposed to this inclusion in the Draft Plan. There was also no proper survey carried out. We are led to believe that the only survey was a “drive through”, and this is emphasised by the fact that they say the site “slopes gently”. We all know that this is totally untrue as it is in fact a very steep site. Building on Cole’s Field is a definite flood risk. We have lived in Orchard Rise for 23 years and during heavy rain water pours into our back garden and gathers behind our house. Witney Street, Swan Lane and Windrush Close regularly flood from rainwater pouring down Barns Lane and this situation would be much, much worse if Cole’s Field did not absorb rainwater. Who do we sue if our houses flood or our foundations are compromised? The Developers or WODC who allowed this site to be built on?</td>
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<td>* There is no suitable access. Witney Street is already a death trap as it is a rat run for people coming from Oxford who wish to avoid queuing at Burford roundabout. The right turn off the A40 into White Hill is precarious to say the least and yet the Planners envisage Witney Street becoming a “main gateway” to Burford from the east! !! White Hill is notoriously icy in winter and several cars each year plough into the ditch/stone wall at the bottom as they take the bend too fast. Further on it floods and is inaccessible on foot for quite a majority of the winter. And Witney Street also bends sharply at the proposed access point - a blind bend. This is an accident waiting to happen.</td>
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<td>* We have heard that there are other more suitable sites in Burford which would provide more houses than 85, namely land in Shilton Road opposite Burford Garden Centre. Burford Town Council supports the application to build on this site. This has good access, is not a flood risk and will not impact visually on the AONB. Surely this is a much more suitable site for development.</td>
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Access to Cole’s Field by car from the north would have to be up the High Street to the roundabout and then down Barns Lane to Frethern Close. Alternatively, a left turn into Church Lane could be taken followed by a left turn onto Witney Street. Another alternative would be to turn left from the High Street into Swan Lane and proceed up Barns Lane. Both Church Lane and Swan Lane are extremely narrow with, once again, cars parked 24/7 as a result of no off-street parking for the residents. The right turn from Swan Lane onto Barns Lane is totally blind and dangerous.

If this development were to proceed how would the many large construction vehicles access the site without causing enormous disruption to the town and its residents for a considerable period? Large vehicles currently cause considerable damage to the verges and often find themselves stuck due to the reduced road width.

Burford is currently at saturation point with regard to traffic with the High Street often blocked from the...
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<td>MM493</td>
<td></td>
<td>David Day</td>
<td>Mr Day</td>
<td>1231</td>
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<td>Bridge at the bottom of the hill to the roundabout on the A40 at the top and on the 361 to beyond the golf club in afternoon rush hour as I frequently find on my way home from work. The proposal to build a further 85 houses on Cole's Field thereby introducing probably a hundred more cars to the town will only add to this problem. There appears to be no plans to develop the infrastructure to support further housing in Burford as are typically excluded at the outset then added in later. If a consequence of building these houses then demands the need for new schools etc., how much is the character of Burford changed overall with these considerations? There is little public transport through Burford with only infrequent buses to some surrounding villages and Witney thereby necessitating most travel being carried out by car. I submit that the proposal to develop the Cole’s Field site is flawed and should be removed from the plan.</td>
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<td>MM495</td>
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<td>T D Ward</td>
<td>-</td>
<td>1233</td>
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<td>The proposed development of this land may be the “least bad” option if new houses have to be built in Burford. It is in some ways better than the Shilton Road scheme, which has a difficult access on to the A40, unless a new roundabout is built. If Coles Field is to be built on I think there need to be two non-negotiable conditions; (a) the only vehicular access should be on to Witney Street as far west as possible and access on to Barns lane for bikes and pedestrians only; (b) the field to the east has to be secured as permanent green-belt because building there would ruin the view of Burford form the north and from the A40. The only way I can see of securing this would be for that land to be handed to the Woodland Trust for tree planting or even the Wychwood Project, although it is outside their boundary. Without those two conditions I think this proposal is unacceptable; (i) because vehicle access to Barnslane would exacerbate the present risks, indeed the narrow lower section is already hazardous for pedestrians and cars; (ii) because although this development could be regarded as infilling any development to the east would have a devastating effect on the AONB. I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site east of Burford known as Cole’s Field. My objection is on the following grounds. The site is within the Cotswold Area of Outstanding Natural Beauty and the Burford Conservation Area. Burford is an historic town with 252 listed buildings and is totally unsuitable for a development of this size and character. Assuming that 85 houses will accommodate approximately 200 persons, this will increase the population of Burford by about 10%. Also assuming about 2 cars per household, there will be 170 extra cars plus delivery vehicles trying to negotiate the narrow roads of this area. We have already had, just recently a lorry stuck in Swan Lane, and two stuck on The Hill and High Street. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow.</td>
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<td>MM497</td>
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<td>Felicity Ziegler</td>
<td>-</td>
<td>Ziegler</td>
<td>1235</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>There was no prior consultation with Burford Town Council, our district councillor, or the body which manages the AONB. The site slopes steeply to the north, despite the developers claiming it is a gentle slope, which will almost certainly cause flooding if not to the houses in Orchard Rise but to somewhere below. There is no suitable access. Witney Street is a narrow country lane, barely two cars wide, and prone to icing up and flooding (only last winter I narrowly avoided a car coming towards me sideways). It bends sharply at the proposed access point, with limited visibility from both directions. The proposed access point in Barns Lane is barely one car wide, a pedestrian using the lane has to press themselves against the wall to allow a car to pass, any increase in traffic will surely result in injury or worse. It seems to me a totally ludicrous place to build a house let alone 85.</td>
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<td>MM499</td>
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<td>Salome White</td>
<td>Dr</td>
<td>White</td>
<td>1237</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>As a local resident, living on Barns Lane, I wish to object in the strongest possible terms to the inclusion in the draft local plan of a proposal to allocate 85 news homes on Cole’s Field, located on the east side of Burford. My objection is on the following grounds: (1) The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a small, historic town and a popular tourist destination with numerous listed buildings. A development of this size is wholly inappropriate. (2) The proposed development will destroy what are stunning views across Burford when approached from both the Oxford A40 direction and from the A424 Stow Road. (3) There was no prior consultation with Burford Town Council, our district councillor or the body that</td>
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| MM501        |                        | Judy Cumming    | Mrs Cumming      | 1239             | I am writing to object to the proposed building of some 85 houses on Cole's Field in Burford on the following grounds:  
1 It is within the Area of Outstanding Natural Beauty and the Burford Conservation Area.  
2 There was no prior consultation with Burford Town Council, our District Councillor, Cotswold Conservation Board (re AONB) or Historic England (re Listed Buildings).  
3 No proper survey was carried out as it is stated in the plan that the site 'slopes gently' down to Witney Street, whereas there is a drop of at least 3 metres at the proposed junction to the road.  
4 There is no suitable safe access.  
Re 3 After heavy rain, water flooding down Witney Street from the fields and adjoining roads already flows through my front door and driveway as there are no drains along the road. This rainwater collects to the extent that the wash from cars hits my front windows. Where would all the ground water go? Additionally, the spring water to my well comes from the upland south of Witney Street and is my only source of water as I am not on the mains grid. The suggested earthworks necessary to create a sunken access road would inevitably disturb the natural springs.  
Also, there are no sewers in this part of Witney Street as nearby houses, including mine, all rely on their own private cesspits. The sewerage system in Burford is already at bursting point. Where would all the grey water and sewage go to?  
Re 4 I have lived here for 25 years and, during that time there have been numerous accidents on White Hill (including a fatality) and Witney Street (cars skidded into my field twice last year) which is a narrow country lane, one wayin places, and most unsuitable for increased traffic accessing Burford across the eastbound A40.  
One proposed access road to Witney Street, facing north, would enter just after a bend obscuring the sightline. Like White Hill, this would become very icy, as this area is the last to lose ice and snow during a cold winter. There are permanent frost signs at both ends of the road. |
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<td>MM504</td>
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<td>J Barton</td>
<td>Mr</td>
<td>Barton</td>
<td>1242</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>This site is unsuitable for the above reasons, and I hope that you will reconsider and reject the proposed plan to build up to 85 houses on Cole's Field. RE: West Oxfordshire draft local plan.. LAND EAST OF BURFORD.. known as COLE'S FIELD I wish to object to the inclusion within the draft local plan of the, proposal to allocate 85 new homes to the above area. My objection to the proposal: Location Within the Cotswold area of outstanding Natural beauty and Burford Conservation area a development of this scale and location in a prominent open countryside position cannot enhance the beauty of the landscape or quality of the historic character of Burford. Character The change from rural to urban development would affect not just the land visually, increase light and air pollution, but have traffic flow impact on the relatively tranquil lanes into Burford from Witney Street and Barns Lane. Out of scale and tagged onto the perimeter of Barns lane it would form, mass isolated town housing with no relationship or easy pedestrian access to Burford. Access No suitable access for the amount of traffic this development would create. 85 properties generate at least 85 vehicles on small country lanes to access, or via busy A40 through Frethern Close and Barns Lane. Sustainability Lack of amenities, small surgery, over- subscribed primary school, failing sewerage, limited public transport indicate the proposal for additional large scale housing would have a detrimental effect on the town.</td>
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<td>MM506</td>
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<td>GB</td>
<td>Mr</td>
<td>Bond</td>
<td>1251</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>Access to Cole's Field by car from the north would have to be up the High Street to the roundabout and then down Barns Lane to Frethern Close. Alternatively a left turn into Church Lane could be taken followed by a left turn onto Witney Street. Another alternative would be to turn left from the High Street into Swan Lane and proceed up Barns Lane. Both Church Lane and Swan Lane are extremely narrow with, once again, cars parked 24/7 as a result of no off-street parking for the residents. The right turn from Swan Lane onto Barns Lane is totally blind and dangerous. The hill on Barns Lane at this point is single carriageway, extremely steep and being north facing and in total shade, more akin to the Cresta Run during cold weather. The wall of The Lodge at the bottom of this hill is regularly demolished by out of control vehicles coming down the hill at speed and failing to negotiate the slight chicane at the junction. Given that there is no footpath on this lane, even if not icy any additional traffic would be a danger to existing pedestrians let alone the, in my view erroneously, anticipated additional ones from Cole’s Field. If this development were to proceed how would the many large construction vehicles access the site without causing enormous disruption to the town and its residents for a considerable period? Burford is currently at saturation point with regard to traffic with the High Street often blocked from the</td>
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| MM508         |                         | Michael Bradley | Mr               | Bradley           | 1253       | > SECTION 9
> STRATEGY
AT THE LOCAL LEVEL
> Burford Charlbury Sub Area > MAIN 193 | bridge at the bottom of the hill to the roundabout on the A40 at the top. The proposal to build a further 85 houses on Cole's Field thereby introducing probably a hundred more cars to the town is unsustainable. There appears to be no plans to develop the infrastructure to support further housing in Burford. Services in Burford are at saturation point with, as I understand it, Burford Primary School oversubscribed, a failing sewerage system, a doctors' surgery where it is currently often necessary to wait up to a month for an appointment and inadequate parking facilities in the town. There is little public transport through Burford with only infrequent buses to some surrounding villages and Witney thereby necessitating most travel being carried out by car. It is difficult to understand what criteria are used to determine housing need. For example, has the effect of the EU referendum vote been factored in to arrive at these figures? What is meant by affordable housing: all housing by definition is affordable. Is this just a wheeze by developers to get planning permission? I submit that the proposal to develop the Cole's Field site is flawed and should be removed from the plan. |
| MM511         |                         | Susan Ashton    | Ms               | Ashton            | 1256       | > SECTION 9
> STRATEGY
AT THE LOCAL LEVEL
> Burford Charlbury Sub Area > MAIN 193 | Consultation Response to WODC Local Plan - Policy BC1b: Land east of Burford I am writing to object to the inclusion of the development of 85 houses on the land east of Burford (¶9.6.34) within the Local Plan. My reasons for objection are as follows: • The site is within the designated Area of Outstanding Natural Beauty. This designation has a purpose which includes the preservation of the beauty of the area for current and future generations. The expansion of housing on this site will have a major visual impact from the east and north and spoil the natural setting of Burford within the Windrush Valley. |
The scale of the increase in housing is disproportionate. The 85 houses would increase the population of Burford by around 20%. If approval is given on appeal for the development of the Shilton Road site just south of the A40 (around 170 houses), the combination would increase Burford's population by 50%. Burford is the tourist attraction it is today because it escaped the ravages of Victorian development, but its ambiance would be destroyed by the impact of this combined development.

The development will add traffic to the surrounding roads. Whether 20% or 50%, the growth in housing will significantly outweigh the growth in jobs, thus increasing outbound commuting, adding to traffic pressure on the A40 in particular.

Burford's local roads are inappropriate for serving the site. Apart from its High Street, all Burford's roads are narrow, and on-street parking reduces them to a single lane with passing places. This particularly applies to Barns Lane and Frethern Close/Wysdom Way. The third entry point to the site, Witney Street is also congested with parking to the west and narrow along the water meadow to the east.

Development of the site is highly likely to increase local flooding. During rain showers, surface water down Barns Lane is not picked up by the drains and enters our property on the corner of Swan Lane and Pytts Lane as well as properties in Swan Lane Close. This is likely to increase with any site access from Barns Lane.

Please take these points into account and remove this site from the Local Plan.

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| MM515         |                         | Hugh Ashton     | Mr               | Ashton            | 1260       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Consultation Response to WODC Local Plan - Policy BC1b: Land east of Burford
I am writing to object to the inclusion of the development of 85 houses on the land east of Burford (#9.6.34) within the Local Plan. I endorse the views of my wife in her objection letter of the same date and wish to expand on a particular area of objection relating the traffic impact as this is an area of personal expertise.

The site east of Burford is totally unsuited to development of any kind because of the safety impact of additional traffic on the surrounding roads. Access to/from the site is entirely dependent on private transport because the public transport services in the area are practically non-existent. The three access points to the site, are all unsuitable, individually or in combination.

Access to/from Witney Street is unsuitable because:

- The junction at Witney Street would be on a curve with very poor visibility towards the east (the source of fast-moving traffic) exacerbated by the need to have the site access in a cutting in the bank
- The junction between Witney Street and the A40 is safe for the left turn onto the A40, but dangerous for all other movements:
  o Right turn from A40 east to Witney Street: Although Witney Street offers a direct connection between Burford and the east, it is signposted 'Wildford' not 'Burford' for the very good reason that the right turn from the Oxford direction is in the face of fast-moving and heavy traffic.
  o Left turn from A40 west to Witney Street: Vehicles making this very sharp (approx. 150 degrees) turn have to slow down to around 5mph in the A40 to make this turn, risking rear-end collisions in a stream of fast-moving traffic. In fact, vehicles longer than cars cannot make the turn in a single manoeuvre.
  o Right turn from Witney Street to A40 west: In the reverse direction this turn is almost as dangerous, as it requires a hill start and crosses both lanes of heavy, fast-moving traffic on the A40.
**In winter conditions, Witney Street often floods east of the site entrance, and becomes impassable as a result of frozen flood water or ice on White Hill.**

Access to/from Barnes lane is unsuitable because it is very narrow with single lane sections above (south) and below (north) the potential access point. The road descends steeply to the north down to a blind junction with Swan Lane. In the winter, Barnes Lane freezes and vehicles have lost control, skidding across the junction - on at least four occasions into our gate on the north side of Swan Lane.

Access to/from Frethern Close/Wysdom Way is unsuitable because it is through a residential area where most of Burford's younger children live, through narrow streets with necessary on-street parking. Frethern Close leads to Barnes Lane from where traffic to/from the north would experience the problems described above. Traffic to the south must navigate around a blind bend on effectively a single lane width road with on-street parking to access the A40 roundabout. Access to the roundabout is difficult in the face of giving priority to the queue of traffic entering the roundabout from Burford's High Street.

The problems I describe relate to the site in use. During construction, the only feasible access would be via Witney Street since the access to Barnes Lane from the A40 already has an 'Unsuitable for Heavy Vehicles' highway restriction. Moreover, the Witney Street entrance could not be accessed from the west since it has a 7.5t restriction and no direct access from the High Street. Access to the site would therefore be via the unsafe junction with the A40, and then only to/from the east. HGVs to/from the west would have to travel the extra 2.6 miles to make a U-turn at the Windmill roundabout at the western end of the Witney bypass.

This site has been included in the Local Plan without local consultation and with the most cursory consideration of the practical issues of its access and development. It should be removed from the final Plan.

Thank you for your consideration of these points.

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**We wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole's Field.**

Our objection is on the following grounds:

1. The site is within the Cotswold Area of Outstanding Natural Beauty and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.

2. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow.

3. There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB.

4. The site slopes steeply to the north and there is a clear risk of flooding.

5. There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and choked with parked cars.
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| MM522         |                         | Trevor and Margaret Yates | - | Yates | 1271 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | We have viewed the above proposal relating to the proposed increase in housing in Burford and wish to raise our objection based upon the following: 

1) Burford is designated an area of Outstanding Natural Beauty and within a Conservation Area. Either the council upholds these designations or they become meaningless. These are the reasons why Burford is referred to as the Gateway to the Cotswolds. 

2) The letter of the 16 November 2016 informing us about the proposal arrived on the 18 November, a day after the first opportunity to view the proposal in Witney. 

3) No prior consultation between WODC and Burford Town Council has been undertaken. 

4) After viewing the proposal we very much doubt if any proper survey has been undertaken to take into consideration traffic access and increase in pollution. Access to the site would be unsuitable from Barnes Lane, Frethern Close/Wysdom Way as both are narrow lanes. The access onto the A40 is already very difficult at times and will only increase with traffic growth leading to accidents. 

5) As the proposed site is on top of the hill, the increase in water runoff from the site would impact on Barnes Lane, Swan Lane, Windrush Close, Orchard Rise and Witney Street. The roads already pool during and after heavy rain. Any increase in water runoff will ultimately have an impact on Witney through increased water levels, leading to flooding. A significant increase in hard surfaces combined with clay subsoil would only compound the situation. The risk of flooding would increase and therefore unless the council carried out significant measures to negate the problem it would be liable for costs of damage caused by water. 

6) Burford is located on a steep hill descending to the valley bottom and the river. To say it "slopes gently" is

5a As residents of Barns Lane we have witnessed, on numerous occasions, HGVs coming down Barns Lane by mistake and then having to reverse back up to the roundabout when they realise it is too narrow, and at least two residents' walls have been knocked down as a result. The bottom end of Barns Lane where secondary access to the site is proposed, is very narrow with only room for one car, and there is no pedestrian footpath or room to build one. Pedestrians are already forced to walk in the road (plus an increasing number of mobility scooters) and this danger would be considerably increased if there was additional traffic in this area. 

5b Having previously been a firefighter in Burford for 20 years, I have witnessed a number of accidents, including fatalities, on the road leading from the A40 to Witney Street, which is our proposed main access route to the new development. The road is very narrow, extremely icy in the cold weather and totally unsuitable for the additional traffic which would be created. Also the increase in traffic turning off the extremely fast and busy A40 will no doubt lead to further accidents and fatalities. 

5c An increase in traffic could also lead to delays in firefighters responding to fire calls as many of them travel from Frethern Close and down Barns Lane. Also increased traffic and cars parked on narrow roads may make access for emergency vehicles more difficult. 

6. The current infrastructure in Burford is already struggling - parking is already a nightmare. The impact on the primary school, GP surgery and other facilities would be considerable with an increase of 85 new dwellings. If a care home facility with up to 60 beds is included, as in the current proposal, that will also have significant workload implications for the GP surgery, as well as the increased traffic to Barns Lane. 

We strongly urge you to remove this proposal from the local plan. |
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<tr>
<td>MM234</td>
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<td>Jennifer Smith</td>
<td>Mrs</td>
<td>Smith</td>
<td>1294</td>
<td>&gt; SECTION 9 &gt; STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>an understatement. 7) The infrastructure of Burford cannot accommodate this increase as the schools have insufficient capacity to absorb the extra children. Parents have already had to pay for improved toilets for a building owned by WODC. Letter: I enclose my representation about the draft local plan. Unfortunately I was unable to write directly on the e-form, as when I clicked on the link it came up with a form I could not write on! I don’t know if this is caused by a problem at your end but it is unfortunate if it stops people from completing the form. While I appreciate the considerable difficulties you no doubt have in finding suitable sites to develop, I would like you to look more carefully at the suggestion of putting houses along Witney St in Burford. The site is unsuitable, being wet with springs and small watercourses, and very steep. The town is congested with inadequate parking. There is little employment in the area so people will be driving alone the A40 adding to the congestion. The site is in a conservation area and more housing will affect the lovely views of the valley as you drive along the A40. However the main issue I have with the proposal is the idea of making White Hill the access to the development, and Witney St a main entrance to the town! White Hill is a narrow country lane, steep, with dangerous bends. It gets frosty and slippery at the top and bottom in cold weather. Local people know not use it in wintry conditions. It floods. People regularly crash along there - cars end up in the fields after sliding down the hill. The access off the A40 is difficult and sometimes feels very unsafe when lorries thunder past on both sides. There is no footpath for most of the road, yet it is a very popular road for walkers, dog walkers, cyclists and horse riders. If a housing development were to be built here, on Coles Field, there would be a massive increase in vehicles using White Hill with the attendant dangers to all road users. If the road were to be widened, and made into a busy thoroughfare, it would ruin one of the main attractions of the town - very many tourists walk or cycle along there as it is a popular route to a very well used public footpath leading to Widford and Swinbrook. Witney St is also narrow. Residents parking makes it effectively a single lane road, but there is nowhere else for residents to put their cars. The fire engine is housed half way along and can not get out if the road is blocked. And at the end of the road, where it joins the High St, the road becomes even narrower as it passes the Burford House Hotel and Walkers Stoves. Is this intention really to encourage more people to use this road to get into Burford? The alternative seems to be Barns Lane, which is also steep and narrow without a footpath, and with ancient walls so no footpath can be built. I do not think enough careful thought has gone into this proposal. I urge you to reconsider and spend more time looking at alternative sites where access is more realistic. Comments on form: 1) Did not inform District Councillor or Town Council or discuss proposals with them. 2) Did not consult Historic England, Cotswold Conservation Board 3) No local consultation with the community. Therefore, not legally compliant and did not comply with the duty to co-operate.</td>
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| MM594        |                         | Ian & Margaret Wright | Mr and Mrs | Wright  | 1370 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Bc1b Cole's Field housing proposal unsound because:  
- Access road unsuitable (i.e. down White Hill or along Barns Lane)  
- Field very steep  
- Field full of springs and watercourses which cause road to flood  
- Clause 9.6.34l - visual impact will be problematic, affecting a lovely view down the hill  
- Increased demand for parking inevitable in town and already the car park is too small and floods. |
| MM599        |                         | Mary Hannah | Mrs | Hannah | 1375 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | We have no problem with the local plan proposed for new housing on the eastern boundary on Burford, as in our opinion it will be “in filling” between what has already been allowed to be built!  
As to the Area of Outstanding Natural Beauty and Conservation Area - this has already been marred by the other developments being allowed.  
With regards to the view across The Windrush Valley being destroyed, how many cars travelling along the route slow enough to observe this?  
As to the flooding in Witney Street, I am sure if there is to be an increased problem through climate change and Burford nestling on a hillside with gentle slopes, that the developers will consider underground water retraining tanks that will allow the rain water to then be slowly released through underground pipes in to the river Windrush.  
Regarding no suitable access - perhaps the previous planners who agreed to the housing being built beforehand, should have given more thought to the congestion “they” were causing on Wysoon Way, Barns Lane and Witney Street, as these roads are regularly used as rat runs to avoid the joys of the congested A40!!  
In our opinion this proposal still seems to be the better option, as Sheep Street, Priory Lane and Tanners Lane would not be able to cope ‘if’ plans were submitted for development on this side of Burford. |

I refer to the proposal to build 85 houses in the area known as Cole’s Field in Burford. While I understand the need to build more houses, this is the wrong plan in the wrong place, for the following reasons.  
The proposed access point in Barns Lane would be a disaster. The Lane is very steep and narrow, already much used by traffic going in both directions, and there is no footpath, so pedestrians are in danger. Nor is there any possibility of widening the Lane, or making a footpath, since the adjacent properties are built right up to the edge of the lane on both sides. The proposal happily included the idea of easy access to the centre of Burford and increased profits for the shops. This is not true; it is too steep and tiring to carry heavy parcels and most of the potential house owners would probably choose to shop elsewhere, using their cars and adding to the unwelcome additional traffic.  
The proposed access from Witney Street (not ‘Road!’) joins Witney Street very close to the access to a footpath much used by walkers with children and dogs. Anyone who knows the area would also be well aware that in precisely that area, water always accumulates and floods in winter, so that cars need to avoid it. Hardly an ideal access point! Any idea of flats or a care home in the area would also be an unwise development, attracting yet more traffic from residents and the staff and visitors to any patients.  
The proposed development is most unpopular in Burford, and the idea of attracting employment to the town... |
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<tr>
<td>MM601</td>
<td></td>
<td>Diana Pearman</td>
<td>Miss</td>
<td>Pearman</td>
<td>1377</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>by the builders is a strange one, since any firm undertaking so much work would import labour. The areas where development might be more sensible are on the road to Carterton or down towards Lechlade. Not in the centre of Burford!</td>
</tr>
<tr>
<td>MM606</td>
<td></td>
<td>Jim Baker</td>
<td>Dr</td>
<td>Baker</td>
<td>1382</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I wish to object strongly to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field. My objection is on the following grounds: 1) The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character. 2) It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow. 3) There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB. 4) The site slopes steeply to the north and there is a clear risk of flooding. 5) There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars.</td>
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I have looked at ‘Local Plan 2013 Examination’ ‘The Burford-Charlbury Segment’ and in particular the proposed Cole’s Field development. This development concerns me because I live in Burford and in particular because I live in Barns Lane adjacent to one of the proposed entrances. I enclose a map that shows the proposed development and my property (Barns Lane House). I recently attended an exhibition arranged by the developer for the benefit of Burford residents. My main concern is with access. The developer tacitly acknowledges this problem because there are three entrances. The estate itself is not so large as to need three entrances (and it is of absolutely no benefit to the surrounding houses, quite the opposite) so the developer is clearly acknowledging and trying to address this problem. As I understand it, the main access will be via Witney Street. This will increase traffic along what is a fairly rural road leading to problems at its junction with the A40. In the other direction, there is of course always the problem of accessing the High Street from any of its side roads. Frethern Close is the second entrance. I’m sure the residents affected will speak for themselves but the Close strikes me as a quiet residential road and not a thoroughfare to what would be a relatively large estate. As for Barns Lane, it divides into two sections. The lower section, running along the boundary of my property, is a single lane bound by retaining walls on either side: cars have to squeeze past pedestrians making their way from the upper section of Barns Lane to the High Street. This causes me two problems: 1. at the top of the lower section cars have to stop if another car is already ascending. They pull into my drive to allow passage. This problem will be made worse in proportion to any increase in traffic, of course. 2. the constant passage of vehicles over time destabilises my retaining wall (and the retaining wall on the other side). I have had to have this wall repaired a couple of times in the last few years. I know traffic is not the only factor but it is a factor and, again, can only get worse if the traffic is allowed to increase. Also, the |
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**MM607**  
Ian Tinson  
-  
Tinson  
1383  
> SECTION 9  
- STRATEGY  
AT THE LOCAL LEVEL  
> Burford  
Charlbury  
Sub Area  
MAIN 193  
main sewer runs down the middle of Barns Lane and I have had to have a repair carried out, necessitating the closure of Barns Lane, and I think traffic must have been a major factor in this case.

All this is quite apart from an HGV that was sent down Barns Lane by its sat-nav and in attempting to reverse out of the cul-de-sac, smashed a piece off my wall ... but that is another story, I'm sure you are aware of multiple events of this type along Barns Lane.

The developer plans for about 5 houses (+ some kind of old people's home) to be accessed by car from the bottom of upper Barns Lane. In addition he seems to be proposing to make the spur road into the development a kind of extension of upper Barns Lane, lower Barns Lane becoming 'no entry except for access' (I guess this would mean a 'no through road - access only' sign at the A40/A361 roundabout). This certainly reflects the difference between 'upper' and 'lower' Barns Lane (i.e. a road a single lane bound by retaining walls). That the developer feels it necessary to reduce by 5 the number of properties to be accessed from Witney Road indicates to me how serious he considers the access problem to be. I would like to object to this proposed development on the grounds that it has no suitable access.

I understand that an alternative development site has been considered, along Shilton Road. I am not familiar with the arguments for and against but would simply point out that this proposed site has no access problems.

**MM608**  
David Mr  
-  
1384  
> SECTION 9  
- STRATEGY  
AT THE LOCAL LEVEL  
> Burford  
Charlbury  
Sub Area  
MAIN 193  
We have read with concern the proposed plans to build 85 dwellings on Coles Field in Burford. Whilst we understand the need to build more housing we are not convinced this is the best place to put houses. Traffic congestion on the A40 and the Burford High Street is already a problem and 85 houses x 2 cars per household will add another 170 cars to the picture. Witney Street where we live already gets very busy especially when there are problems with the A40 and the town rightly attracts many visitors all year round. It is our opinion that Shilton road might be better suited to any new developments if Burford has to take its share of new housing.

I am writing in reference to the proposed development of some 85 houses on Cole’s Field in Burford. While acknowledging the need in Oxfordshire for new housing I must express serious opposition to this proposal. My criticism of the proposal are for the following reasons:

1) The A40 is already suffering from major traffic problems between Burford and Oxford. Yet demand is related to Oxford’s needs.

2. There has been no proper survey carried out.

3. There has been no proper consultation with Burford Town Council.

4. Cole’s Field is on a hill and there is a water run-off down to Witney Street which is running alongside the flooding area beside the Windrush.

5. It will if badly designed detract from the economy and style of Burford "the gateway to the Cotswolds." The views and countryside walks along the Windrush are celebrated as one of the county's most attractive walks - an area of beauty and true historic interest.

6. It is indeed within the Area of Outstanding Natural Beauty and a Conservation Area. The congestion on the A40 and extra traffic caused by the scheme will inevitably create disruptive traffic on the quiet and narrow country road.
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| MM609         |                         | John R Histon  | -                | Histon            | 1385       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | For the above reasons and since I find it hard to understand why a flat plain region along the A40 near Oxford is eschewed rather than a steep sloping field with flooding risk - I must deplore such a proposal.
I also feel that a responsible developer would not seek the approval and support of existing residents by discussing the size and design of the scheme in advance. An excellent illustration along Witney Street is Chapman's Piece. Let the developers scale this scheme and design to fit the area, its history and its depth. |
| MM30          |                         | Ivan Hall      | Mr               | Hall              | 1386       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I am writing to you to express my objections to the draft plan to allocate land to the east of Burford for a potential development of 85 new houses. My key objections are on the grounds of the robustness of the plan; the practicality of its delivery; and the safety of residents and visitors. In support of these objections, I contend that:
1. Robustness
   - There was no prior consultation on the plan with our local WODC councillor (Derek Cotterill); with the Town Council; or with Cotswold Conservation Board or Historic England
   - The site is in the Cotswold AONB where previously no major development has been allowed
   - Contrary to statements within the draft plan, the site is clearly visible from the town and its surrounds
   - The previous draft local plan said that “the development potential of land surrounding Burford is heavily constrained by the sensitivity of the landscape although there may be some scope for a small-scale extension of the built-up area”. This has been struck through in the new draft with no explanation as to why this is so.
2. Practicality |

With reference to the proposal to include the site locally as Coles field in to the Revised Draft Local Plan. This proposal is ill thought out by your team. It would seem that you have drawn on a plan without deep thought as to the implications on the environmental effects on Burford Town.
The location is in an area of outstanding natural beauty as you should well know. There has been a local developers proposal exhibited in the Town.
Apart from the site contours are quite extreme for residential development, the access points for the site are totally inadequate for a development of this size. Witney Street and Barns Lane are totally inadequate to service such a site, both narrow lanes heavily used to avoid the constant traffic jams on Burford High Street.
The Burford sewage system as existing is at this time inadequate for the Town. As you will know the is still the problem of raw sewage flowing down the gutters on the High Street at times relating to the weather conditions. The site is therefore totally inappropriate on the terms of Infrastructure alone, access, sewage and surface drainage. We then come on to the location of the consideration of Burford being a overflow to Oxfords housing demands. The A40 is at almost total capacity at present, Highways attempt to improve the traffic flow at the two roundabouts just completed will be as of nothing due to the vast housing development now under construction close to the Pear Tree Roundabout.
There is a large site close to Carterton and Shilton under construction at this time and there is vacant MOD land in Carterton that has infrastructure in place, that could be developed The WODC is wrong in looking at sites as far away from Oxford as Burford where the impact on a small town, currently inadequately serviced by creaking infrastructure, that will bring chaos to the current environment, and also detrimentally change the character of this small town. |
• The draft plan is incorrect when it states that the site slopes “gently down towards the north east corner and the Witney Road”. In fact the slope is very steep down to the proposed access point on Witney Street and would require a massive excavation of earthworks

• The site also falls steeply down to the houses to the north. Any development would bring the serious risk of flooding to dwellings in Orchard Rise, Windrush Close, Swan Lane and down as far as Witney Street. All such premises narrowly escaped serious flooding in 2007 because the (arable field) site was able to absorb most of the significant rainfall in that year.

3. Safety

• The draft plan contemplates that the main vehicular access to the site would be from Witney Street (aka the Witney Road in the draft plan) and this road would become a main gateway to Burford from the A40 and the east

• Leaving the A40 from the east into the so called Witney Road (White Hill) is a major safety hazard for drivers, particularly at night and in poor visibility. The junction is difficult to see and nerves of steel are needed when waiting in the middle of the carriageway with vehicles passing closely on both sides at 50+ mph. One nudge from behind could easily take waiting vehicles into the west bound traffic

• The Witney Road is a narrow, unclassified lane that experiences flooding, severe icing and fog pockets in the winter

• It is also widely used by walkers and cyclists. It is part of the popular circular walk around Burford and on the national Cycle route (57)

• Vehicular access to the site from the north, south or west would also be complicated. Options appear to be:

  i. manoeuvring through the centre of Burford with several turns, narrow roads and busy traffic (particularly in the summer months)

  ii. using Barns Lane which is narrow and steep and has no footpaths at its lower end. It also has many parked cars and is a twice-daily route for children and parents walking to the local primary and secondary schools

  iii. passing Burford on the A40 and doing a difficult 270 degree turn into the east end of the Witney Road near the Ramping Cat House.

Clearly Burford should take its proper share of new dwellings to meet local needs. It should not be responsible, however, for housing more Oxford commuters that would add further traffic at peak times to the busy A40. Some smaller scale developments have already occurred within Burford e.g.in Falkland Close and the Frethren Close estate. In addition, the previous draft plan also identified further possible sites in Burford at Tanners Lane, Burford Cottage Hospital and on the land to the south of Sheep Street. It is not clear why these have been deleted from the Plan. It is also unclear whether serious thought has been given to flat land on the south side of the A40 (outside the AONB and not in sight from the north).

Please take account of these objections as part of your further drafting of the Plan. I look forward to seeing the next version which I hope will be more robust and practical, and will enable the continued safety of Burford residents and visitors.
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<td>MM610</td>
<td></td>
<td>Cecil Balmond</td>
<td>-</td>
<td>Balmond</td>
<td>1387</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field. My objection is on the following grounds: 1. The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character. An addition of 85 homes is a high proportion of the existing urbanisation and impacts fundamentally on shifting the town East and Southwards affecting the centric charm of the main spine fed by the minor roads Witney and Swan Close etc. The special feeling to the town is due to its close knit spread and a new sprawling 5 Hectare plus new development destroys this charm. The narrow Witney Street will be seriously blocked with traffic creating nuisance to the old homes near to the main North South road in the town. The other particular charm of Burford is the open around the landscape, open fields with spectacular views as one approaches from the A40. This will be totally compromised by the proposed development. 2. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow. 3. There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB. 4. The site slopes steeply to the north and there is a clear risk of flooding 5. There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars. 6. We are the owners of Bull cottage at 12 Witney Street, the oldest property in town from 1390. The extra traffic will add vibration to the street, add toxic fumes from cars and service lorries and damage the original fabric. 7. Therefore on the above grounds we object strongly to the development by Carterton Construction at Burford.</td>
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<tr>
<td>MM612</td>
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<td>M Ruth Handley</td>
<td>-</td>
<td>Handley</td>
<td>1390</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I wish to strongly OBJECT to the inclusion in the draft local plan of the proposal to build 85 new homes and a 60-bed extra-care facility on the agricultural land to the east of Barns Lane in Burford known as Cole’s Field. My principal objections are as follows: Flood Risk - Clause 9.6.34j states the site slopes &quot;gently down towards the north east corner&quot;. In fact, the site slopes steeply down towards the north and thus any development on the land would create a flood risk for the houses and land below in Swan Lane, Orchard Rise, Windrush Close and beyond, especially as the river Windrush on the north side of Witney Street has a tendency to flood. Views of Burford - this development would be seen for miles around - not just &quot;fleetingly&quot; from the A361 north of Burford - such as the A40 coming from Oxford, the A424 from Stow, the Swinbrook area. The lovely view of Burford has already started to be eroded by the houses built on Oxford Road, Frethern Close, Wysdom Way, Barns Lane (to the north &amp; west of the site).</td>
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"Protected" area - the site is within the Cotswold Area of Outstanding Natural Beauty (AONB) as well as the Burford Conservation Area - Burford being a very small historic town (population less than 1500) with 252 listed buildings. It is built on a steep hill with the busy A40 at the top and the river Windrush at the bottom - the only access north is via the High Street (A361) over a narrow one-width bridge controlled by traffic lights. The town has narrow roads with buildings either side and is entirely unsuitable for a development of this size and character, especially given the severe access difficulties. I would also question the point of designating areas as being in an AONB and a Conservation Area when planners then decide to completely ignore any planning restrictions.

Access from the east - Clause 9.6.34m refers to Witney Road (sic) - it is actually called Witney Street. The draft suggests that Witney Street could "also provide a gateway entrance to Burford from the east". This would be a disaster for Burford and traffic in general - some issues being as follows:

* the road off the A40 (known as White Hill) falls quite steeply before Witney Street (the draft refers to "gradient issues") and is frequently icy in the winter and prone to flooding. It is also used by many walkers (heading to 'the meadows' and further beyond to Swinbrook and Asthall. It would definitely not be suitable for regular use by large vans or HGVs - or indeed a multitude of cars heading north and wishing to 'cut off the A40 roundabout corner'.
* most houses on Witney Street in Burford have no off-street parking available and thus cars are parked 24/7 along the road. Where would they go? There is already a parking shortage in Burford.
  * Witney Street becomes one-way and one-car width only as it reaches the High Street (A361) - with buildings tight on either side. Access onto the High Street is often difficult.
  * There are two roads leading off Witney Street before the High Street: to the left, a tight turn into Pytt’s Lane which is a narrow road going uphill to Barns Lane, even narrower and steeper; to the right is Guildenford where again houses have no off-street parking. The only town car park is at the bottom of Guildenford to the right (entry & exit being over a narrow one-lane bridge) - to the left, the road becomes Church Lane which winds its narrow way to the High Street (A361). Not suitable for regular use by large vans - or a multitude of cars.

Access from other directions - Clause 9.6.34m mentions "secondary vehicular accesses may also be achieved from Frethern Close/Wysdome Way to the south and Barns Lane to the west". This is not correct.

* access to both Frethern Close and Wysdome Way is only via Barns Lane so the above statement is incomplete
* Barns Lane itself is a small exit road off the Burford Roundabout (A40/A361 junction) with an immediate very sharp dangerous bend - houses on the right have no off-street parking available. Barns Lane is not suitable for regular use by large vans (eg daily deliveries to the proposed care centre) or a multitude of cars, especially as it becomes one-car width down a steep hill with stone walls either side before the Swan Lane junction - Barns Lane then becomes Pytt’s Lane which, as previously mentioned, is narrow - stone walls either side.
* no mention of access from the north - traffic would have to come up the already very congested High Street (very steep hill) to get access to the site via Barns Lane.

I would urge you to delete this site from consideration for the draft local plan.

We write to comment on the draft Local Plan 2031:

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<td>Corner</td>
<td>-</td>
<td>Corner</td>
<td>1392</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>We write to comment on the draft Local Plan 2031: There are a number of principles that we support.</td>
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1. The draft plan says that the Cotswold AONB Management Plan has been a key influence (page 12).

2. Furthermore, the plan says that there is 'an acknowledged need to further enhance and extend habitats' (p20) and that even relatively small scale developments on land in the AONB would only be permitted where demonstrably in the public interest (p120).

3. The overall strategy is to 'locate development in the right places' specifically mentioning the need to 'protect important areas such as Green Belt and AONB (p30).

Much is made elsewhere in the report on the importance of the tourist industry in and around Burford; the AONB, the listed buildings, the scale and ambience of the town all being recognised as important contributory factors. It is because of this that we object to the specific proposal to develop 85 homes on land to the east of Burford (p54).

Paragraph 9.6.34g on page 290 which recommends the development of this land is inconsistent with the overriding principles. No justification is given for needing to build on this land. Where is the real effort to explore alternative options even though WODC is aware that there are other proposals for housing in and near Burford currently under consideration.

Paragraph 9.6.34j says that the land in question 'slopes gently'. It does not. Whilst it is relatively level at its southern section, it slopes steeply to the north - as steeply as Burford High Street! It is also subject to water run off.

Contrary to paragraph 9.6.34k, vehicular access is not easy, either from Witney Street or from Barns Lane which is on a particularly steep and narrow part of the road. Even now there is no room on the steep stretch of Barns Lane between the proposed entrance to the Cole's Field site and Swan Lane for a footpath.

Paragraph 9.6.34q does not summarise cogent arguments. Rather it is dismissive of the importance of the AONB and of the topography of the land and of vehicle access issues.

With regards to the proposed development of 85 homes we would like to point out that there is no account taken of the current infrastructure problem the existing Burford residents face. These include:

- limited school places
- a medical practice that is oversubscribed
- limited parking facilities
- very limited public transport, consequently over reliance on private cars
- traffic grid lock, a regular feature on The Hill with a recent serious accident between a car and a pedestrian highlighting the consistent traffic problems and dangers.

The infrastructure is currently struggling to cope with supporting Burford residents and the numerous tourists and coach parties that visit on a daily basis. This proposal does not take into consideration the further infrastructure that would be needed to support the proposed 85 homes.

The questions we would like to ask is where within the proposal plans for Burford do you plan to increase the
**Comment (plain text)**

**existing infrastructure? For example, how do you propose to deal with added burden of such a significant population increase for such a small community?**

It seems to us that there is a deliberate disregard for an area of AONB/Green Belt and the nature of its outstanding heritage. We would therefore like to object in the strongest possible terms.

---

**Jeremy Burnett**

> Cole's Field, Burford

We would like to give the WODC our views on the proposed development of the above. We would object for the following reasons:

* It is within the Area of Outstanding Natural Beauty and the Conservation Area.
* There is no "gentle" slope onto Witney Street.
* The water table on the land road side of the Wind rush river is regularly very high causing flooding of the large area including the public footpath leading to Widford.
* We would like to ask where the run off water will be directed, what drainage proposals are in place, are they viable? We have experienced living in the Madley Park development in Witney where we were advised the measures taken to contain the obvious extra rain water run off was adequately provided for. It was not, causing a large flooding problem both on Madley Park and further down in Witney town.
* The Burford sewage system is not able to accept any more domestic sewage as is well documented.
* The work prospects for future owner occupiers in the immediate area is extremely low as is obvious, therefore a journey into Witney/Oxford or beyond will be necessary along an already overloaded A40.
* The public transport services from Burford are much reduced and not conducive with hours of work.
* However Charlbury has a good train service to Oxford/ London but the proposed development there is for 40 houses not 85!
* There is no proof of the necessity for a development of this size in Burford although there is need for a small amount of Affordable/Social housing for the families needing housing at a lower purchase price/lower rent.

We feel that the Local Plan desperately needs to take a long term view of the housing needs in the Witney/Oxford/Bicester areas where access to employment is more readily available via public transport/ cycling etc., not long car journeys, otherwise we will be creating a massive problem in future years regarding the road systems which are already heavily overloaded.

We live at the top of the Hill in Burford and can confirm the traffic is daily at a standstill from the roundabout (A40).

We would appreciate your planning officers taking a long term view of this area of Oxfordshire please, it is extremely worrying to be constantly wondering if anyone really cares or listens to the voices of the people affected by their decisions. We are writing to you in anticipation of, maybe, our voices being heard.

---

**Mr & Mrs Tighe**

> My wife and I wish to object to the proposal for the following reasons:

**Flooding risk - the site falls away sharply at its northern boundary into the gardens of Orchard Rise.**

These gardens are formed in a series of terraces and flooding already occurs to some degree in times of heavy rain. If the field becomes predominantly tarmac and concrete we fear a significant subsidence risk will arise. This issue will also affect Windrush Close, parts of Swan Lane and Witney Street.

**Access - We note the change of site plan which may or may not mean access from Witney Street. In any event, access to this site would involve circa 125 extra vehicles using Barns Lane, Frethern Close and possibly**
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| MM616         |                         | CG Sparkes      | Dr Sparkes       | 1396       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Witney Street. The first two roads are narrow, occupied by parked cars and fast becoming a "rat-run" used by drivers to avoid the congested High Street. The use of Witney Street, presumably on the blind bend as you exit Burford, also means regaining the A40 at the Ramping Cat Nursing Home. This junction is already dangerous and heavier congestion may have serious and unintended consequences. If the egress from the proposed development is into Burford itself, the single lane exit from Witney Street onto High Street will become even more of a traffic problem.

Additional infrastructure - 85 houses brings with it circa 300 people who will require a surgery, schooling and public transport facilities. Are there any plans in place to accommodate this extra demand when the waiting time for a doctor's appointment is already over 7 days, the schools are oversubscribed and the local bus service is struggling.

Area of Natural Beauty - Burford lies within the Cotswold AONB and attracts many tourists from all over the world, helping to keep the town vibrant 2nd to help the local economy. Not only were we led to believe that large development would not be permitted within the AONB but also any such development could have a very negative effect on the attractiveness of the town to visitors.

The proposed site is not, in our opinion, well screened from any direction. It is highly visible from all roads and, of equal importance, is also highly visible from the many walking routes which are used throughout the year by locals and visitors alike.

For the above reasons we feel strongly that the proposed development, which has suddenly appeared without local consultation, would be bad for Burford and bad for WODC. |
| MM716         |                         | Oonagh Barber    | Mrs Barber       | 1397       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | We would like to submit my strongest objections to the proposal for 85 new houses to be built on Cole's Field on the Eastern boundary of Burford. Burford is a unique town in terms of its history, its remarkable buildings and natural beauty. Its economy is maintained by tourism.

The proposed development can only have a detrimental effect on this conservation area in an AONB. The views across the Windrush Valley would inevitably be destroyed for visitors, walkers and international tourists.

In addition the current drainage systems could not support additional housing down the steep slope into the town. New access roads to the proposed houses would cause significant problems to the town - the roads in and around Burford get quickly jammed by the already heavy traffic that flows through. HGVs cause already unacceptable problems to traffic flow as they try to find alternative routes to the Bridge via side roads.

I understand that there is an alternative site in Shilton Road which is currently under review - this has not been mentioned in this proposal - it would be a much more suitable site. |

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| MM616         |                         | CG Sparkes      | Dr Sparkes       | 1396       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Most of those who live in the area are very concerned about the proposals for 85 new houses to be built on Cole’s Field on the Eastern boundary of Burford. Burford is a unique town in terms of its history, its remarkable buildings and natural beauty. Its economy is maintained by tourism.

The proposed development can only have a detrimental effect on this conservation area in an AONB. The views across the Windrush Valley would inevitably be destroyed for visitors, walkers and international tourists.

In addition the current drainage systems could not support additional housing down the steep slope into the town. New access roads to the proposed houses would cause significant problems to the town - the roads in and around Burford get quickly jammed by the already heavy traffic that flows through. HGVs cause already unacceptable problems to traffic flow as they try to find alternative routes to the Bridge via side roads.

I understand that there is an alternative site in Shilton Road which is currently under review - this has not been mentioned in this proposal - it would be a much more suitable site. |
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| MM617         |                         | Dr S G Barber  | Dr               | Barber            | 1398       | > SECTION 9 <STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | 4. There is no opportunity to widen the road access along Bames Lane or Swan Lane. I urge the WODC to reject these plans.  
1. The site is within an Area of Outstanding Natural Beauty and Conservation Area.  
2. The site does NOT "slope gently" but is steep.  
3. The access to the site from Bames Lane is narrow and winding, with trucks already getting stuck in it after inadvertently entering it from the A40/A361 roundabout.  
4. Access via Swan Lane from The Hill (Burford main street) is similarly narrow and difficult with existing traffic levels. Drivers currently avoid this route as a result of these problems.  
5. Access to the Burford main street from the proposed site is already congested, narrow and frequently dangerous. Pedestrians and drivers therefore avoid this route where practicable.  
6. Pedestrian access along each of these three routes is already dangerous, with narrow pavements in Witney Street and none in Swan Lane or the steep parts of Barnes Lane.  
7. Sites to the South of the A40 should be explored again, since these would avoid the congestion and dangers that the proposed site would generate.  
Please recommend the WODC to reconsider and reject the current November 2016 proposal |
| MM13          |                         | dp             | mr               | price             | 14         | > SECTION 9 <STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | As a resident who has suffered from excess traffic, rain water and parking within Burford, I struggle to see how a further 85 houses within the most densely populated area within Burford will help these issues.  
The use of Barns lane for any further traffic seems unsafe and unwise in my view. It has to manage single file traffic, on a lane which also has to allow foot traffic which at times can prove unsafe even with the current levels of traffic and housing. I cannot see how this is a feasible access point (be it primary or secondary) for a potential further 200 cars potentially to be moving through the lane each day.  
The reference to water drainage seems to go without true consultation with local residents, many of whom already suffer with rainwater run off and problems which would only be exacerbated by development of such a crucial first line of defence to the town.  
Finally, the AOB designation put significant constraints on all residents and is understood and accepted as it maintains the integrity of this crucial element of English history and a significant tourist trap - helping the local economy and employment. The impact of such a development with its visual impact and fundamental shift from the current layout of the town will in my opinion ride roughshod over all elements of the principals of AOB. |
| MM717         |                         | Nora Thomas    | -                | Thomas            | 1400       | > SECTION 9 <STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | No one in their right mind could consider the proposed potential development of Cole's Field.  
If you live in the area as I have since 1962 you are very aware of the increase in traffic over the years. The conditions in the High Street are often appalling. Are you seriously considering spreading this to White Hill and Witney Street where the road widths are considerably narrower.  
With road traffic increasing by 5% per annum a nightmarish picture arises. And that’s just considering getting |
My husband and I write to express our extreme concern that the above land is being considered for a development of 85 houses. Our two fundamental objections are on the grounds of traffic and of potential flooding, though there are many other reasons why this plan would not, in our opinion, be acceptable.

1. TRAFFIC AND THE PROPOSED ACCESS TO THE DEVELOPMENT VIA WITNEY STREET

Witney Street is used extensively for parking by both residents and visitors, which effectively makes the road too narrow for two cars to pass along it in opposite directions without constant deferring. To add a busy access road would exacerbate an already difficult situation. We live on Sylvester Close and frequently we cannot enter Witney Street (our only egress from the Close) to go either left or right because of stand-still traffic queuing to the intersection with the High Street. This is equally true of sometimes not being able to get back into Sylvester Close, because of queuing traffic, to get to our home. To add even more traffic would make this situation untenable for local residents, and potentially dangerous as access to Sylvester Close and the High Street end of Witney Street would be hampered for emergency vehicles. Also, the efficiency of the Fire Station on Witney Street, would undoubtedly be adversely affected by the additional traffic.

Additionally, Guildenford and Church Lane, which serve the only car park in the town, are already dangerously narrowed by parking and cannot tolerate more traffic. The High Street is already at gridlock for significant parts of every day and to add such a large housing development will only make it worse. Until there is a bypass for Burford Hill - or at least a lorry ban -we cannot understand how adding so many houses to the town, and therefore more traffic, can possibly be considered a good thing.

2. POTENTIAL FLOODING RISK

The local plan makes reference to the proposed plot of land as being "gently sloping". This is a vast underestimate of the reality - it is a steep slope. The plan also says that the land is not in a flood zone: As the land is at the top of the hill this is undoubtedly true - but surely to build such a large development on arable land can only cause the rain to run off that concreted and tarmaced area and potentially cause real flooding into Burford from the East.

To even consider traffic from the opposite direction aiming for a Cole’s Field building estate is even more ludicrous.

Another serious effect would be that of the obvious increased likelihood of flooding in the Swan Lane and Swan Lane Close area. With the disappearance of the field which is able to absorb much of the heavy rain which is one of the effects of climate change this must surely happen. Anyone who has been walking from Swan Lane Close to the High Street will have experienced the rain rivers rushing down Barns Lane across Swan Lane, turning left into Swan Lane Close. And that’s with Cole’s Field acting as an absorbent. The result would be horrifying.

I don’t quite understand the point of acknowledging particular areas such as Burford as needing protection both for now and future generations if lust for money takes precedence. These places are irreplaceable and future generations would quite rightly curse us for being foolish and feeble enough to allow Burford to be completely ruined.

No one in their right mind could agree to such destruction of Burford that the building of a housing estate such as this would cause.

Perhaps you need to live in such a special place to be fully aware of this potential threat.
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<td>MM618</td>
<td></td>
<td>Martin Harrison</td>
<td>-</td>
<td>Harrison</td>
<td>1405</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>problems for people further down the hill. This must be particularly true for those residents of Orchard Rise and of Witney Street, but for many others as well. 3. DESTRUCTION OF GREEN BELT LAND AND AN HISTORIC TOWN A development of this size, in our opinion, is tantamount to vandalism of the countryside. Once built the land is destroyed forever. This is particularly true when it affects an important historic town like Burford. The plan suggests that the development would be good for the economy of the community. We would argue quite the opposite. Ancient towns like Burford are largely reliant on tourism and to damage the integrity of the town with this proposed development would most certainly NOT serve the community and nor would it benefit posterity. Thank you for giving us the opportunity to air our very real concern about this proposal.</td>
</tr>
<tr>
<td>MM619</td>
<td></td>
<td>S A Brown</td>
<td>Mrs</td>
<td>Brown</td>
<td>1406</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site east of Burford known as Coles field. My objection is on the following grounds: 1. The site is within the Cotswold area of outstanding natural beauty, Burford conservation area. Burford is a historic town with 252 buildings and is entirely unsuitable for development of this size and character. 2. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow. 3. There was no prior consultation with the Burford town Council, our district councillor or the body which manages the area of outstanding natural beauty. 4. The site slopes steeply to the north and there is a clear risk of flooding 5. There is no suitable access road, Whitney Street is a narrow country lane which is prone to icing up at the top, and flooding at the bottom and bends sharply at the proposed access point. Frethern close and Barnes Lane are also narrow and are choked by part cars, Barnes Lane has a very dangerous blind bend before access to the A40 roundabout, with potential for accidents to occur. 6. A more suitable location would be near to Carterton, which has the advantages of good access to supermarket grocery shopping, and also gas supplies for home heating, both of these are not available in Burford,</td>
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| MM720        |                        | John Yeatman   | -                | Yeatman           | 1407       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | 5. There is no suitable access road. Whitney Street is a narrow country lane which is prone to icing up at the top, and flooding at the bottom and bends sharply at the proposed access point. Frethern close and Barnes Lane are also narrow and are choked by part cars, Barnes Lane has a very dangerous blind bend before access to the A40 roundabout, with potential for accidents to occur.

6. A more suitable location would be near to Carterton, which has the advantages of good access to supermarket grocery shopping, and also gas supplies for home heating, both of these are not available in Burford. |
| MM620        |                        | Susan Judge    | -                | Judge             | 1408       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I recently received a letter from you proposing to include the building of 85 houses on land to the rear of my property, known as Coles Field.

I am writing to put forward my opposition to the building of houses on this site for the following reasons:

1 - The site is within the Conservation Area and is classified as an Area of Outstanding Natural Beauty

2 - Burford is the second most visited tourist destination in West Oxfordshire, famous for its ancient buildings and layout of the Town. Our ancient buildings and pristine surrounding countryside is an irreplaceable asset that will serve the economy of this town well beyond my generation. This development would be extremely prominent and would irreparably damage the landscape and views of the Town from both the A429 and A361, both important vantage points. I am fearful of the adverse effect this will cause on the natural landscape and in turn, on tourism.

3 - There is no viable access to the site. The proposed access from Witney Street would be dangerous and cause major traffic problems in Witney Street and the junction with the High Street. Barns Lane is a single-track road at the lower end with no footpath, so the extra 'limited access' proposed would again cause major problems.

4 - There is a current planning application for housing in Shilton Road, and Burford Town Council have suggested alternative sites which would provide the number of houses required without the impact on the Old Town. I believe these to be much better options to serve the growing housing needs of the Town.

I contacted my local District Councillor, Derek Cotterill and Burford Town Council for more information and was staggered that neither has been advised or consulted on this proposal. This doesn't give me much confidence in your consultation process and I have concerns this application is being steamrollered in, without the proper dialogue and due diligence.

As a lifetime resident of Burford and an active community member, I must reiterate that I am deeply concerned about the potential ecological and economic impact of this development for our ancient town. I fully intend to join community efforts to make sure that this planning process is conducted properly and the right outcome achieved. |

I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field. My objection is on the following grounds:

1. The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.

2. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow |
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<td>MM621</td>
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<td>James Pringle</td>
<td>-</td>
<td>Pringle</td>
<td>1411</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>We had the opportunity to see the Carterton Construction proposed scheme for new homes in Burford this afternoon, and wish to state our very real objection to any development in Cole's Field. Our first complaint is the arbitrary manner in which this project is being pursued, contrary to the wishes of the Burford Town Council, and the district councillor. Secondly the siting militates against the concept of the Cotswold Area of Outstanding Natural Beauty, and would put a blight on the views of the parish church and beyond, and thirdly the access roads are already congested, and such a development would only exacerbate the situation. Doubtless there are many other reasons for faulting the proposal, but the manner in which the project has been imposed on the local council without consultation, justifies its failure. We would be grateful if you would lodge our objections.</td>
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<td>MM622</td>
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<td>Penelope Leaf</td>
<td>Mrs</td>
<td>Leaf</td>
<td>1412</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I am writing to object to the inclusion in the draft local plan of Cole’s Field as a suitable place to build 85 houses or any similar project. The steep slope of the land and risk of flooding are clearly against it as is the fact that it will destroy the views which are part of the heritage of a Cotswold town such as Burford. Surely there should have been consultation with AONB, and our own Town Council. But by far the greatest objection must be that the proposed access in Witney Street and Barns Lane to such a new development is just not viable. Witney Street is narrow and winding, a country road subject to flooding and used to capacity already. Barns Lane is dangerous because of the junction to Swan Lane and too narrow to take extra traffic. I realise that homes must be built somewhere but this site should be dropped from the draft local plan as not feasible on many counts.</td>
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<td>MM624</td>
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<td>E J Hodgkinson</td>
<td>Mrs</td>
<td>Hodgkinson</td>
<td>1414</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>Can it be possible that there is to be consideration for this ridiculously sized development for a Cotswold town in an AONB area? The volume of traffic using the A40 &amp; A361 regularly creates gridlock around Burford town. Ref 9.6.34p There will be massive detrimental impact on the environment and surrounding landscape by the imposition of a so-called ‘gateway’ to Burford in Witney Street and the building of this estate of houses. These lanes currently mostly carry light traffic and due to the nature of the flooding risk, icing over in winter and narrow approaches should remain so. It is a walkers route with the recent addition of a narrow roadside footpath and when this path becomes very wet - regularly - walkers tend to walk along the road. This path leads into the fields and the only access to walks along the River Windrush.</td>
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<td>MM625</td>
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<td>John W Hannah MBE</td>
<td>-</td>
<td>Hannah</td>
<td>1419</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>The road from Asthall to Burford is indicated on maps as 'a scenic route'. THIS is 'the gateway' to Burford and will not be enhanced by the view of tens of new houses on an 'estate development'. There will inevitably be many extra cars, delivery vans, and lorries along this narrow, winding, flood and ice prone lane. Will users of the proposed properties choose walking as a means to visiting the town centre - if indeed they were to use the town's facilities? More likely to fill the town with their parked cars or block up the currently heavily used and impossibly frustrating A40 routes to access other shopping areas. Additionally a 'rat-run' would be created for traffic trying to avoid the frequent grid lock in the town from the north or east. Access to and from the A40 from this road, particularly from the east, can already cause frustration and delay, a situation which will be made worse. It has generally been accepted that the traffic situation on the A40 is unsustainable and to introduce the possibility of further problems for access to the East, in particular, smacks of some 'dumb thinking' on behalf of those who are appointed to serve our town and county's interests. A commonly used phrase for some of us when growing up was USE YOUR NOUS. I urge all those involved in this decision to do so.</td>
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<td>MM630</td>
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<td>B J Marks OBE</td>
<td>-</td>
<td>Marks</td>
<td>1436</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>The proposal to build 85 new homes on the land East of Burford on site 144 (Cole's field) should be rejected for the following reasons: a. The steepness of the slope will be unsuitable for motor vehicle access during ice or snow conditions. Also, the area is liable to flooding. b. Due to the steep gradient, access using Bames Lane at the junction with Swan Lane would be dangerous in icy conditions. c. To use Witney Street as a main access to Burford High Street would deprive Witney Street residents of car parking spaces. Witney Street is too narrow and is in a conservation area. d. The site is in the Cotswold Area of Outstanding Beauty. Many visitors to the area enjoy the walk from Burford to Swinbrook. The proposed housing estate would spoil magnificent scenery. e. Views from the A424 Stow Road towards Burford would be spoilt. Please reject the proposal to build houses on site 144.</td>
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<td>MM631</td>
<td></td>
<td>Shirley Russell</td>
<td>Mrs</td>
<td>Russell</td>
<td>1437</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I wish to object to the new plans for 85 houses to be built on Cole's Field, Burford. The idea of another 85+ cars driving in and out of Burford along already clogged roads is ludicrous. Get rid of the lorries first. The steepness of the hill regularly causes flooding in Witney Street; definitely not a &quot;gentle slope&quot; as claimed. The egress from the proposed development into Witney Street, a narrow road exiting onto the A40 is well-known to be hazardous at the best of times. Before increasing the size of the town we need lorries to be banned and residents' parking.</td>
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<td>MM66</td>
<td></td>
<td>EE Burford</td>
<td>Mrs</td>
<td>Elliot</td>
<td>167</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I wish to object to the proposal in policy BC1b concerning land east of Burford (&quot;the site&quot;). My objections are that this conflicts with policy set out in the draft local plan (&quot;DLP&quot;), is impractical and has not been the subject of proper process and consultation. Numbers in the text below refer to paragraphs in the DLP. ROADS AND TRAFFIC The policy in the DLP includes the following: CO1 Enable new development, services and facilities of an appropriate scale and type in locations which will help improve the quality of life of local communities and where THE NEED TO TRAVEL, PARTICULARLY BY CAR, CAN BE MINIMISED. [Emphasis added] It is very unlikely that more than a tiny proportion of occupants in a new development on the site would work locally. It is probable that the great majority would work in larger centres such as Oxford, Cheltenham or Swindon. This almost certainly means travelling by car. Burford has a roughly hourly bus service to Witney and Woodstock and three buses per day to Oxford or Cheltenham. The nearest station, Charlbury, is eight miles away and is only accessible by car although its car park is regularly full. The local roads are not adequate to cope with the extra load. It is contemplated that the main access to the site would be the road (incorrectly called Witney Road) connecting Burford to the A40 and that this road would also become a &quot;main gateway&quot; to Burford from the east (9.6.34m). This is a narrow country lane. It has a difficult turn from the A40 across heavy traffic going east, the hill below is prone to icing in winter (as the road sign there points out) and it is regularly flooded on the lower parts (which can also be icy when wet). Numerous accidents have taken place along this stretch. The proposed access point is on a blind bend and below a steep bank. Further on, any cars using the road to reach Burford town centre have to go along a road with cars parked on both sides where it is frequently necessary to give way to traffic coming in the other direction. It ends at a narrow one way junction with the High Street which is regularly choked with traffic and from which a right turn is difficult. The DLP gives no explanation of how traffic to the site from the north, south or west would reach the site but there would be little choice but to go via the congested High Street and then narrow roads such as Swan Lane, Barns Lane, Pytts Lane and Guildenford. These are also occupied by parked cars and often have no pavement. It should be noted that the only public car park is frequently full and that parking is a serious problem. The only other access possible access points are from Barns Lane (see above) or via Barns Lane into Frethern</td>
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Close (another road full of parked cars).

ENVIRONMENT AND LANDSCAPE

The DLP includes these policies

CO2 Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire

CO14 Conserve and enhance the high environmental quality of West Oxfordshire with protection and promotion of its diverse landscape, biodiversity and geological conservation interests, and its local cultural, heritage and environmental assets.

E4 Proposals in the Cotswolds AONB should conserve the landscape quality and biodiversity of the area and support the objectives of the Cotswolds AONB Management Plan and Sustainable Tourism Strategy.

EH1 When determining development proposals within or impacting upon the Cotswolds Area of Outstanding Natural Beauty, great weight will be given to the conservation of the area's landscape and scenic beauty.

Despite these several statements, the DLP has proposed building in a prominent site in the AONB. The previous version of the DLP said that "the development potential of land surrounding Burford is heavily constrained by the sensitivity of the landscape although there may be some scope for a small scale extension of the built up area". This has been struck through in the latest draft although nothing has happened to change that judgement. In my submission WODC is wrong in changing this section which is clearly inconsistent with the policy stated. This decision is unreasonable and outside the proper exercise of WODC's powers.

Burford is a medieval town with a unique collection of buildings. The grade 1 listed church was awarded five stars in England's Thousand Best Churches by Simon Jenkins, arguably the most authoritative book on the subject. The town has 252 listed buildings, one of the highest concentrations of such buildings anywhere in the country. It attracts visitors from all over the world, not just to Burford but to West Oxfordshire, and I am told that this is worth £15m per year to the local economy. This supports the previous judgment that Burford is a sensitive location.

The best place from which to view Burford as a whole is from across the Windrush valley using the popular walk via Westhall Manor towards Fulbrook or other footpaths around Fulbrook. It can also be seen from the A424 from Stow on the Wold. The statement in the DLP that views of the site are "relatively fleeting" (9.6.34l) are demonstrably incorrect. I understand that our district councillor, Derek Cotterill, has provided photographs showing how the site is in clear view from across the valley.

ALTERNATIVE SITES

The DLP states:

5.21b The rural service centres of Bampton, Burford and Charlbury will also be required to make provision for new housing with existing commitments being complemented by a number of site allocations.

I doubt if anyone objects to Burford taking its share of housing provided that this is handled sensitively and in...
accordance with the policies in the DLP set out above. It should therefore be aimed at meeting local need rather than providing homes for commuters travelling to work by car on congested roads. In considering what is appropriate the following points are relevant.

Burford and Charlbury are identified as service centres (9.6.2), defined as places with shops and transport. Burford has shops but only four (Co-op, newsagents, butchers and pharmacy) primarily serve the local community. The others derive a greater or lesser part of their income from visitors. Most residents do their major shopping in Witney, Carterton or elsewhere. As noted above, transport by bus is limited and Charlbury is the nearest station eight miles away.

Charlbury has buses hourly to Oxford, Woodstock and Chipping Norton (9.6.12). It has regular trains to Oxford, London, Worcester and points in between and these may be hourly from 2018 (9.6.12).

Charlbury has a population of nearly 3000 and Burford has a population of 1300 (9.6.2).

Despite all the above Charlbury has been allocated 40 homes and Burford 85 (9.6.31). No further comment seems necessary.

In any event alternative and less sensitive sites are available at Burford. Firstly there is a site on the west side of Burford where Tanner's Lane joins the A40. This has easier access, is not within view from the distance and poses no risk of flooding (as to which see below).

Secondly the DLP states that the only alternative would be to build south of the A40 where "the Council's assessment of land availability has been unable to find any suitable sites" (9.6.34o). It is extraordinary that no mention is made of the site on the west side of Shilton Road opposite the Burford Garden Company. This is currently subject to an appeal to a planning inspector against WODC's refusal of planning permission for the construction of 169 homes on that site. The result of the appeal will not be known until January 2017 but it is impossible to consider the area's housing need without taking that site into account.

If the appeal is allowed, the provision of these houses would more than meet Burford's share of local housing needs and the land covered by BC1b would not be needed.

Even if the appeal is dismissed, that would not be a sufficient reason to omit that site from further consideration for development. The decision would be to refuse permission for that particular planning application. It would not mean that the site was unsuitable for development at all. It would be a much more suitable site than the land covered by BC1b because (i) it has better access, (ii) it is outside the AONB (iii) it is not visible from a distance and (iv) it poses no risk of flooding. Clearly it should be on the table in any discussion of housing allocation for the area. The omission of such an obvious site in the DLP is a major flaw in its methodology.

FLOODING

The DLP includes the following policy:

CO15 Contribute to reducing the causes and adverse impacts of climate change, especially flood risk.

The DLP describes the site as "sloping gently down towards the north east corner and the Witney Road." This is incorrect since the site falls quite steeply and towards the north west rather than the north east corner. Immediately below on the northern edge is Orchard Rise. The houses here are cut into the hillside and the
drop is so steep that the roofs are almost level with the edge of the field. If the site is built upon, there is a clear risk that run off water would cause flooding in Orchard Rise and possibly other roads lower down.

Because of climate change this country is subject to periods of rain much heavier than used to be the case. (See, for example, A Changing Climate: Should Britain Worry Now" by Rachel White, research associate in atmospheric physics, Imperial College London to be found at https://www.iop.org/activity/groups/subject/env/prize/winners/file_63297.pdf. Provision of a swale at the lower end of the site would not be sufficient. If water soaks into the ground it would have to go somewhere and its natural escape would be downwards.

This is also relevant to the proposed access from Witney Street. At that end the ground also drops towards houses at the eastern extremity of Burford. These houses sit on ground that is frequently wet and close to the river (one of them is called Springfield for good reason) and are already very exposed to run off water during heavy rain. Building on the site would increase the risk of flooding, especially if the access road were to join the lane near these houses since it would act as an obvious conduit for water.

CONSULTATION

Finally I would like to point out that the DLP was drawn up without any consultation with the Cotswold Conservation Board (responsible for the AONB), Historic England (responsible for designating the listed buildings), our district councillor or Burford Twon Council, any of whom could have pointed out serious defects in the DLP as regards Burford. As a result the DLP is flawed, has not been the subject of proper process and should not be proceeded upon in its present form.
make sure that the significance of heritage assets is understood when considering allocations, 'this involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value' (Historic England Advice Note pg. 4).

The suitability of the site for development has been questioned throughout in the emerging evidence base for the local plan and has been discounted as unsuitable in the 2014 Strategic Housing and Employment Land Availability Assessment (SHELAA). It is unclear, without any further heritage or landscape evidence having been produced, how this position has changed in the interim period to the 2016 SHELAA, changing the recommendation from 'not suitable' to 'suitable'. The 2014 SHELAA assessed the site (143 and 144) as unsuitable for development stating that the site: 'forms part of attractive entrance to Burford from the east and is a key element of the local character. Very poor access to site would prevent development without large scale tree felling. Site contributes to the character of the Conservation Area. 'The impact on the setting of the Conservation Area outweighs the need for development in this part of town'

In contrast the 2016 SHELAA now states that 'whilst views of the site can be achieved from the north-east development if designed sensitively [it] would read as part of the existing built form of the town.' The reason for the conclusion of suitability is set out in the SHELAA that 'the site is considered suitable for development subject to overcoming access constraints and provided development is designed to read as part of the existing settlement'.

There is no explanation in the SHELAA or the Local Plan evidence base of how such a different conclusion to that of 2014 has been reached, or for that matter why reference is now made in the Main Modifications to the acceptability of development in the east of the town with no evidence to support it.

The 2014 assessment states that the site itself contributes to the character of the Conservation Area. Although there is no Conservation Area Appraisal for the Burford Conservation Area, it is reasonable to conclude that this greenfield site has been included in the conservation area (since its extension in 1991) due to its openness, and contribution to the green setting of the built up area of the town itself.

Land to the East of Burford forms part of the overall landscape setting of the Conservation Area and is important in terms of its undeveloped character. It is not clear from the proposed Main Modifications how development of the site so that it would 'read as part of the existing built form of the town' would preserve the or enhance the character and appearance of the area which is important for its open and undeveloped nature. It is therefore contended that this development would cause harm to the Conservation Area.

Case Law has clarified the interpretation of the statutory duties to preserve and enhance heritage assets. In the Court of Appeal Decision R (on the application of The Forge Field Society and others) v Sevenoaks District Council [Case No [2014] EWHC 1895 (Admin)] where there was need for development but the development would cause harm to heritage assets, the need to consider alternative sites was emphasised as part of the statutory duty of preservation. In this case, the site was in the AONB, a conservation area and in the setting of grade II* and grade II listed buildings. Linblom J set out in the decision that:

The lack of an updated evidence base with regards to proposed allocations and the historic environment indicates that the plan has not been positively prepared, is not consistent with national policy and does not meet the legal requirements for protecting and conserving the historic environment.

This raises concerns about the level of research the Council have done into the impacts of the development on the natural and historic environment. The SA Appendix 5, which assesses the proposed non-strategic allocations, states that Land to the East of Burford does not contain any designated heritage assets and
considers that potential impact on Proposed Local Plan policy OS4 (High Quality Design) will provide sufficient mitigation of harm (pg 97).

The site selection process and the sustainability appraisal are clearly fundamentally flawed, it does not get close to understanding the potential harm and impact of a potential development on a nationally significant conservation area with a high proportion of listed buildings and a pristine historic core. While the SHELAA assessments refer to the conservation area, the site selection process appears to have been blind to these potential risks and has failed to properly consider viable alternatives which are less constrained and more appropriate. This is further compounded by the fact that the Cabinet Agenda Report from the 19th October 2016, when the main modifications were approved by Cabinet stated that the Land East of Burford, ‘lies outside (although adjacent to) the Burford Conservation Area’. This raises serious concerns and does not instill confidence that the Council have considered the site allocations in anywhere near enough detail, indeed the Council made a decision to progress to consultation based on false information put in front of them.

Landscape Impact

The proposed allocation at Land to the East of Burford is located within the Cotswolds AONB. Paragraph 115 of the NPPF sets out that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty’.

Areas of Outstanding Natural Beauty are designated in accordance with the Countryside and Rights of Way Act 2000 which confirms that the purpose of designating AONBs is the conservation and enhancement of natural beauty of the area. It also requires a management plan to be produced for each AONB to formulate policies for local authorities and for carrying out their functions in managing it.

The most up to date landscape assessment for the district is the West Oxfordshire Landscape Assessment 1998 (WOLA). The WOLA identifies Burford as being part of the Upper Windrush Valley As set out in the proof of evidence of Mr. Benjamin Rosedale at the recent appeal inquiry for Land at Shilton Road, the site is widely visible from the north and east and contributes to the distinction between the northern areas of Burford and the historic core on the river terrace to the south. The WOLA identifies several characteristics of the Upper Windrush Valley Landscape Character Area which are set out in Mr. Rosedale’s proof of evidence:

• ‘moderate to high intervisibility, distant views along and across the valley;
• valleyside/urban edge very visible from Fulbrook;
• classic distant view of the church spire approaching Burford on the A40;
• urban edge harsh in places, particularly viewed from A40 entering Burford and on Witney Street;
• urban silhouette from valley floor harsh in places’.

The WOLA also identifies key sensitivities including that any further urbanisation of the A40 corridor should be resisted as change would be visible. Overall, in his proof of evidence, Mr. Rosedale concludes that:

‘It is clear that the development to the east of Burford would be both prominent and harmful to the distinct character of Burford when viewed from the east and north (largely from locations within the AONB)’. 
### Burford - Charlbury Sub-Area

As already stated, Policy H1 should be amended to omit reference to new housing at the rural service centres of Burford and Charlbury. As stated above, the Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 25% from 800 to 1,000 homes. Paragraph 115 refers to great weight and 116 of the NPPF clearly states that exceptional circumstances must be demonstrated to justify allowing major development in the AONB. This paragraph states that consideration of such applications should include an assessment of the need for the development and its impact on 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 and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area: however, that is not a reason to increase housing within the sub area.

Given the deliverable opportunities to address housing need in those parts of the district outside of the AONB, recognising that there will still be 800 homes in the sub area, there have been no exceptional circumstances given for the inclusion of additional land within the AONB for development in the draft Local Plan. As a consequence, MM184 should be deleted as it refers to allocations at Burford, Charlbury, Shipton-under-Wychwood and Stonesfield, all within the AONB. The plan is not justified when considered against the reasonable alternative to development in the AONB and inconsistent with national policy.
exceptional circumstances given for the inclusion of additional land within the AONB for development in the draft Local Plan. As a consequence, MM184 should be deleted as it refers to allocations at Burford, Charlbury, Shipton-under-Wychwood and Stonesfield, all within the AONB. The plan is not justified when considered against the reasonable alternative to development in the AONB and inconsistent with national policy.

Ecology and Natural Environment

In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

Burford East

The site is within Cotswolds AONB. It may be particularly noticeable in views from well-used public rights of way along the Windrush Valley.

The Upper Windrush Conservation Target Area lies nearby to the north.

The site could provide an opportunity to provide additional publicly accessible green space close to the town centre.

There may be hydrological impacts on water quality and quantity, in this context the fisheries value of the upper Windrush is noted.

There are potential opportunities for new local rights of way links.

Policy BC1b - Burford

b) provision of satisfactory vehicular access and appropriate pedestrian and cycle connections. Any vehicular access provided from the Witney Road will be required to contribute positively to the eastern approach into Burford providing a ‘gateway’ entrance to the town.

Two of the aims of the Burford & District Society ("the Society"), as set out in its constitution, are:-

1. "To promote high standards of planning and architecture in Burford and the surrounding parishes."

2. "To secure the preservation, protection, development and improvement of features of historic or public interest in Burford and the surrounding parishes".

In furtherance of those objectives, the Society roundly condemns Policy BC1b as set out in the Plan namely the building of about 85 dwellings on Cole's Field on the following grounds:-
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| MM88 |                         | Dianne Taylor  | Mrs Taylor       | MM88              | 232        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | 1. It is within the Area of Outstanding Natural Beauty and the Conservation Area.
2. It will destroy the views across the Windrush Valley and the Parish Church from the A40 coming from Oxford, the A424 coming from Stow, the A361 coming from Chipping Norton and from Westhall Hill, Fulbrook.
3. There was no prior consultation with Burford Town Council.
4. There was no proper survey carried out.
5. The lack of a proper survey is evidenced first by the statement in the plan that the site “slopes gently” down to Witney Street whereas it is actually very steep and secondly by the suggestion that there is no flood risk whereas Witney Street regularly floods from rainwater pouring down the “gentle slope” and the many natural springs on the site.
6. The houses in Orchard Rise are below the level of the site and will also flood.
7. There is no suitable access. The plan’s recommendations are Frethern Close/Wysdom Way and Barns Lane both narrow country lanes already choked by parking and traffic and Witney Street (referred to in the Plan as “Witney Road”) a country lane with blind corners and ice traps which has no speed restrictions until it reaches the built up area.
For all these reasons the Society requests that Policy BC1b be removed from the Plan. |
With respect, I believe this conflicts with Locating Development in the Right Places Point 4.10

"Putting development in the right places can also help to reduce development pressures on sensitive locations, including the AONB and Green Belt."

Indeed, a developer this month proposed a plan to the local community which takes in more of that adjoining field than is shown in the revised local plan. This is evidence of the pressures put on sensitive locations.

3 More specifically, Policy BC1b point 9.6.34m states

"this also presents the opportunity to provide a gateway entrance to Burford from the East. Secondary vehicular accesses may also be achieved from Frethern Close, Wysdom Way to the south and Barns Lane to the west (although the narrow nature of this route would mean a very limited number of dwellings could be served from here)."

With respect, apart from the fact that the site has had to break into a further field to provide a main access point, the proposed access from the east is unsuitable as Whitehill freezes in the winter, as does Witney Street where the proposed access will be. There are Ice Road Traffic Signs at both ends of this minor road. The signpost on the A40 does not mention Burford at all as it is not suitable for heavy traffic use. It only directs motorists to Widford along this route. To create a "new gateway" to Burford along Witney Street, which forms a funnel by becoming one way at the Burford end, seems completely illogical. Also, Burford already has its Gateway at the top of the Hill on the roundabout at the A40.

The Wysdom Way access is also unsuitable due to parked vehicles in Frethern Close and along this route. It has already suffered extra traffic from what was originally intended by the creation of the Affordable Housing on its perimeters.

It has been stated that the Barns Lane access should serve a limited number of dwellings due to the narrow nature of the route. Driving from the A40 down Barnes Lane there are two SLOW signs painted in the road with 40M distance between them. These are just before the proposed access. The Government Publication 'Traffic Signs Manual 2003' Point 22.4 states that

"discretion should be exercised in the use of the marking to ensure that its impact is not reduced through proliferation. At particularly hazardous sites the marking may be repeated to give added emphasis".

This confirms the unsuitability of this area as an access point. The plan does not recognise it as the hazardous site it is which is a narrow, steep north facing hill which freezes in winter and has no footpath.

As a corollary to this, this month a developer exhibited a proposal to the community for this site. They proposed a 60 bed care home and 5 houses be served from this access point. A 60 bed care home would have at least 20 parking spaces and would be accessed day and night by staff and service vehicles and, of course, visitors.

One wonders whether the developer read point 9.6.34m or, indeed, this could be another example of already 'pushing the boundaries' to a sensitive location. It does seem inappropriate to present a scheme to the local community when it conflicts in two ways with the Revised Local Plan.

4 There are flatter sites with better road access. I would recommend a development either on the Shilton
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<tr>
<td>MM90</td>
<td></td>
<td>Michelle Thornton</td>
<td>Miss</td>
<td>Thornton</td>
<td>234</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>The field was designated a AONB. The site was already investigated for development and our opinions were asked for and any development was rejected.</td>
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</table>
| MM114     |                         | SB Richards     | Mr             | Richards        | 283        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | As a resident of Barns Lane, Burford I object for reasons listed below to the inclusion in the draft local plan of Cole’s Field, Burford, and the proposal to erect 85 houses.  
1. 9.6.34p It is considered that development of this site would not have a detrimental effect on the environment, landscape or any recreational opportunities. The site is within both the Cotswold Area of Outstanding Natural Beauty and also the Burford Conservation Area. Burford is a quite exceptional historic town containing over 250 listed buildings on a beautiful site ranking amongst the most famous in the country. It is in the national interest to preserve and safeguard its distinct character and natural beauty. As such a development of this size and character would be quite out of place.  
2. 9.6.34l In terms of landscape and visual impact, whilst the site comprises relatively high ground, it is relatively well-screened from wider views. Whilst views of the site can be achieved from the north east when travelling along the A361 these are relatively fleeting.  
A development of 85 houses and a care home on this site would profoundly affect the views across the Windrush Valley and the parish church from virtually all the land on the North side of the valley whether roads, residences, public access land or farmland, and also from the East. The proposal seems to envisage that a view is material only if it is seen from a passing car. It is of far greater import that the permanent views of those who live, work and walk will be irrevocably damaged. The proposal violates policy EH7.  
3. There was no prior consultation with the relevant local bodies, namely the Burford Town Council, our district councillor, Natural England or the Cotswolds Conservation Board. The Council will therefore be unable to submit an adequate updated statement of Community Involvement.  
4. 9.6.34k The site is not within a designated area of flood risk. The site slopes steeply to the north and there is a clear risk of flooding. It is understood that it is proposed that surface water be disposed of by infiltration, leaving an artificial swale at the lower end of the site to absorb the water. This would be inadequate to absorb the amount of water at present falling on the whole field. In addition, no provision is made for disposal of the accumulated water with a resultant flooding risk below the field. The current drainage system in Burford is overloaded and unable to accommodate any further demands.  
5. 9.6.34m In terms of access there are a number of options etc etc. There is no suitable vehicular access  
It is envisaged that the primary vehicular access would be taken from the north east corner onto the Witney Road, south of Burford or on the A40 west of Burford near Tanners Lane. |
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| MM115        |                         | Linda Richards | Mrs Richards   | 284        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Road

The proposed main access, Witney Street, is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. There is a road sign warning of ice at the entrance to Whitehill. More importantly, most of the traffic entering the site would not use this access. Traffic from the northern side would have to cross Burford bridge and up the A361, the main town thoroughfare, which is already overloaded to bursting point. It would then have to turn left along Church Lane (Witney Street being one way and with no entrance) along narrow streets with sharp bends, often congested by parked cars and vehicular and pedestrian traffic from the public car park. The only alternative would be to proceed up The Hill, adding to the existing congestion and turn left along Swan Lane with the same problems as for the lower access point or go up the top of the Hill and approach via the roundabout via Frethern Close or Barns Lane which are also narrow and choked by parked cars and vehicular traffic, often Heavy Goods Vehicles, attempting to avoid the congestion on the A361. All the accesses to the A361 are narrow, congested and dangerous. Traffic from the West and South would similarly require access through Frethern Close or Barns Lane. Pedestrian access to the town, to the West of the site, would be down Barns Lane which is narrow, steep and unsafe for walkers.

6. The Burford Primary School is already oversubscribed and unable to cope with any further demands.

As a resident of Barns Lane, Burford I object for reasons listed below to the inclusion in the draft local plan of Cole’s Field, Burford, and the proposal to erect 85 houses.

* 9.6.34p It is considered that development of this site would not have a detrimental effect on the environment, landscape or any recreational opportunities.

The site is within both the Cotswold Area of Outstanding Natural Beauty and also the Burford Conservation Area. Burford is a quite exceptional historic town containing over 250 listed buildings on a beautiful site ranking amongst the most famous in the country. It is in the national interest to preserve and safeguard its distinct character and natural beauty. As such a development of this size and character would be quite out of place.

* 9.6.34l In terms of landscape and visual impact, whilst the site comprises relatively high ground, it is relatively well-screened from wider views. Whilst views of the site can be achieved from the north east when travelling along the A361 these are relatively fleeting.

A development of 85 houses and a care home on this site would profoundly affect the views across the Windrush Valley and the parish church from virtually all the land on the North side of the valley whether roads, residences, public access land or farmland, and also from the East. The proposal seems to envisage that a view is material only if it is seen from a passing car. It is of far greater import that the permanent views of those who live, work and walk will be irrevocably damaged. The proposal violates policy EH7.

* There was no prior consultation with the relevant local bodies, namely the Burford Town Council, our district councillor, Natural England or the Cotswolds Conservation Board. The Council will therefore be unable to submit an adequate updated statement of Community Involvement.

* 9.6.34k The site is not within a designated area of flood risk.

The site slopes steeply to the north and there is a clear risk of flooding. It is understood that it is proposed that surface water be disposed of by infiltration, leaving an artificial swale at the lower end of the site to
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<td>MM118</td>
<td></td>
<td>Neil Treloar</td>
<td>Mr</td>
<td>Treloar</td>
<td>291</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>I live at number 11 Frethern Close Burford. I have just read the letter sent to me on the 16th November 2016, telling me you plan to build 85 houses in the field belonging to Mr. Cole, which is directly North of my home. I am in the process of buying this house from my Mother. I have had two valuations, both show that the fantastic view adds considerable value to the dwelling. Are there any plans to compensate residents for the loss of value to their homes if this development goes ahead? I am also keen to learn if you are aware that most people on the North side of Frethern Close have a legitimate right of access to the field due to uncontested common access over many decades. I personally have consent from the Land Owner Andy Cole, and would hope that if any houses are built on the field, I will still have practical access to the rear of my property, without having to resort to legal representation in the case of myself and many of my neighbours.</td>
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<td>MM120</td>
<td></td>
<td>Alec Hammond</td>
<td>-</td>
<td>Hammond</td>
<td>293</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>I would like to question the plan and would respectfully suggest that it is bordering madness for very many reasons including the following: 1/: There is no suitable access for the volume of traffic that a development of 85 homes would generate. Has anybody from the department looked at Barns Lane recently? Whether access is proposed direct from Cole’s field onto Barns Lane or via Frethern Close/Wysdom Way onto Barns Lane it simply would not work. Barns Lane is already chocked by parking and traffic which generally makes it so narrow that driver’s have to wait for any vehicle coming in the opposite direction and at peak times is almost ‘grid locked’. I dread to think what would happen if the Fire and Rescue Service needed rapid access to any of the properties. Access onto Witney Street is also unthinkable. The proposed plan refers to the site sloping gently down to absorb the water. This would be inadequate to absorb the amount of water at present falling on the whole field. In addition, no provision is made for disposal of the accumulated water with a resultant flooding risk below the field. The current drainage system in Burford is overloaded and unable to accommodate any further demands.</td>
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* 9.6.34m In terms of access there are a number of options etc etc.

There is no suitable vehicular access

It is envisaged that the primary vehicular access would be taken from the north east corner onto the Witney Road

The proposed main access, Witney Street, is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. There is a road sign warning of ice at the entrance to Whitehill. More importantly, most of the traffic entering the site would not use this access. Traffic from the northern side would have to cross Burford bridge and up the A361, the main town thoroughfare, which is already overloaded to bursting point. It would then have to turn left along Church Lane (Witney Street being one way and with no entrance) along narrow streets with sharp bends, often congested by parked cars and vehicular and pedestrian traffic from the public car park. The only alternative would be to proceed up The Hill, adding to the existing congestion and turn left along Swan Lane with the same problems as for the lower access point or go up the top of the Hill and approach via the roundabout via Frethern Close or Barns Lane which are also narrow and choked by parked cars and vehicular traffic, often Heavy Goods Vehicles, attempting to avoid the congestion on the A361. All the accesses to the A361 are narrow, congested and dangerous. Traffic from the West and South would similarly require access through Frethern Close or Barns Lane. Pedestrian access to the town, to the West of the site, would be down Barns Lane which is narrow, steep and unsafe for walkers. In addition, the town centre is extremely congested and additional traffic will put an unacceptable strain on the existing parking facilities

* The Burford Primary School is already oversubscribed and unable to cope with any further demands.
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<td>MM122</td>
<td>AMR</td>
<td>Mrs Rothkopf</td>
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<td>295</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I am writing to oppose the building of 85 houses on the field between the A40 and Witney Street in Burford. Coles field is a totally unsuitable area for the building of houses due to the fact that the roads cannot support more traffic and the field is essential for the absorption of rainfall which runs down into the river Windrush. Having lived in Witney St for 38 years I have experienced first hand the problems of car ownership and flooding in this valley. The turning off the A40 single carriageway into White's Hill is notoriously treacherous. Whites Hill becomes icy in winter and there have been many fatal car accidents in this area. Access to the public footpath along the Watermeadows is hazardous. There is insufficient room for cars to park or even people to walk and so there is a constant danger of collisions. As a walker I have experienced many close encounters with speeding cars. There is nowhere for cars to park. Burford houses are built close to the road and few have driveways. I often cannot park near my own home. Unloading shopping, babies or elderly people can often mean double parking and blocking the road. Witney St has the fire station, a church and two pubs so is busy with cars at all times. Flooding is always a problem especially as the area is the run off into the river Windrush. Covering the open land with houses can only divert more water onto the road and existing homes down the valley. While it may be socially responsible to accommodate more people here I believe the geographical problems are insurmountable.</td>
</tr>
<tr>
<td>MM124</td>
<td>Amelia Richards</td>
<td>Mrs Richards</td>
<td></td>
<td></td>
<td>297</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford</td>
<td>I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole's Field. My objection is on the following grounds:</td>
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| MM125         |                         | Andrew Butcher  | Mr               | Butcher           | 298        | CHARLbury Sub Area > MAIN 193 | 1. The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.  
2. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stowand from the A361 from Charlbury and Shipton  
3. There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB  
4. The site slopes steeply to the north and there is a clear risk of flooding  
5. There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars.  
6. There is not enough capacity in Burford for primary/secondary school requirements.  
7. The surgery be will be overloaded, particularly as one of the surgeries in Witney is closing down.  
8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13% |
|               |                         |                 |                  |                   |            | SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | We write to comment on the draft Local Plan 2031 which is being consulted on currently.  
There are several over-riding principles that we support. Specifically, we strongly support the four following points:  
The draft plan says that the Cotswold AONB Management Plan has been a key influence (page 12).  
* Furthermore, the plan says that there is 'an acknowledged need to further enhance and extend habitats' (p20) and that even relatively small scale developments on land in the AONB would only be permitted where demonstrably in the public interest (p120).  
* The overall strategy is to 'locate development in the right places' specifically mentioning the need to 'protect important areas such as Green Belt and AONB' (p30).  
* Much is made elsewhere in the report on the importance of the tourist industry in and around Burford; the AONB, the listed buildings, the scale and ambience of the town all being recognised as important contributory factors.  
The plan's vision includes a desire to reduce reliance on the private car (p24). In this respect, we note that public transport links to Burford are limited.  
There is one regular bus service connecting Burford with Woodstock via a circuitous route taking in Carterton and Witney. |
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| MM135         |                         | Ben Richards    | Mr               | Richards          | 310        | *SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | * There is an infrequent bus service between Oxford and Cheltenham which stops on the A40 at Burford.
* The nearest train station is at Charlbury some 10 miles away but not linked to Burford by public transport. It has limited parking.
Places in the local schools are limited.
Therefore and in this context, we object to the specific proposal to develop 85 homes on land to the east of Burford (p54). This land is part of the AONB!
Paragraph 9.6.34g on page 290 which recommends the development of this land is inconsistent with the overriding principles. No justification is given for needing to build on this land. There does not appear to have been any exploration of alternative options even though WODC is aware that other specific proposals for housing in and near to Burford are under consideration.
Paragraph 9.6.34j says that the land in question ‘slopes gently’. It does not. Whilst it is relatively level at its southern section, it slopes steeply to the north – as steeply as Burford High Street!
Contrary to paragraph 9.6.34k, vehicular access is not easy, either from Witney Street or from Barns Lane which is on a particularly steep and narrow part of the road. Even now there is no room for a footpath on the steep stretch of Barns Lane between the proposed entrance to the Cole’s Field site and Swan Lane
Paragraph 9.6.34q does not summarise cogent arguments. Rather it is dismissive of the importance of the AONB and of the topography of the land and of vehicle access issues.
We trust you will recognise the importance of the stated principles in respect of the AONB and the need to reduce reliance on the private car, and so withdraw the proposal to develop housing on land to the east of Burford. |
|               | West Oxfordshire draft local plan – policy no. BC1b – land east of Burford | We wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field | Our objection is on the following grounds:
1. The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.
2. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton
3. There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB
4. The site slopes steeply to the north and there is a clear risk of flooding
5. There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are |
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<tr>
<td>MM143</td>
<td></td>
<td>C D Daukes</td>
<td>Brigadier</td>
<td>Daukes</td>
<td>319</td>
<td>&gt; SECTION 9</td>
<td>I write to object in the strongest possible terms to elements of the revised local plan currently out for public consultation. Notwithstanding the requirement of WODC to redraft its plan following the Government’s insistence on additional housing, the site to the east of Burford to accommodate 85 houses introduced into the revised draft without consultation with that Town’s Council (which may in itself be a breach of the Town and Country Planning regulations) is wholly inappropriate and importantly contradicts many of the principles on which the District Council’s plan is and has always been based.</td>
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Most Significant Shortcomings

* No credible case. The draft Local Plan 2031 injects new proposed developments into the rejected plan to satisfy the requirement for more new houses set by central government. Nowhere in the revised draft is a credible case made for the addition of 85 houses in Burford. On the contrary the Town Council is opposed to the development.
* The disregard and defilement of the Area of Outstanding Natural Beauty and with it the destruction of the views across the Windrush Valley and of Burford’s famous parish church from the A40 which tour guides use as an introduction to this important tourist destination. Policy EH1 stands for the protection of the local landscape. ...’Proposals which result in the loss of features important for their visual value... will not be permitted’... yet, given the location of the 85 house site to the east of Burford, this policy is simply ignored.
* The proposed site is unsuitable. The site to the east of Burford is steep, there is no access from the A40 and the remaining access roads are already identified choke points within the Town. Witney Street, a country lane proposed as the principle access, floods frequently as the result of overflow from the water meadows, run-off and winter springs from the proposed development site.

Factors Ignored by the Proposal

The draft Local Plan 2031 ignores a string of important principles which otherwise form the basis of this and past plans.

Paragraphs 2.26 - 2.49 The Plan fails to substantiate the need for 85 additional houses in Burford. There is no identifiable local employment to support the increase in population and the demand for housing in the area is already met by the existing supply so that houses are taking up to a year to sell and, within a mile of the Town, Bradwell Village has empty houses on the market. Paragraph2.26 shows Carterton, the only nearby major employment centre in the area, as having ...‘low employment opportunities’...
travel to Oxford City. Without a suitable bus service, commuting from Burford to Oxford either involves a 25
minute car journey to Charlbury where there is insufficient parking, a 35 minute car journey along the A40 to
Oxford Parkway or a car journey also along the A40, a road well recognised as a major bottleneck. The route
to Oxford City from Burford, a distance of only 14 miles, can frequently take over 1 ½ hours in the morning
traffic.

Paragraph 2.33 concedes that there are no dedicated cycle routes out of Burford either to Carterton, Witney
or the west.

Paragraph 2.40 identifies ‘...high rates of fatalities and serious injury’... on the district’s roads. All this despite
the Plan’s aim (paragraph 4.7) to reduce current levels of out-commuting and increase ‘self-containment’;

Paragraph 2.43 points to pressure on primary schools. Burford’s Primary School is full and serves families as
far afield as Carterton. An additional 80+ families in Burford will add to this problem. Contrary to the draft
plan’s suggestion of multiple retail outlets in Burford, the Town is served by a single small food/household
provision shop and the nearest supermarket is in Carterton.

Paragraph 2.49 applauds the contribution the ‘...rich and varied historical environment’... makes to ‘...the
distinctive character and identity of the area’... Concentrated enclaves of 85 houses on such a small green-
field site in an AONB will severely diminish this character.

Paragraph 3.3 The District’s Core Objectives include: ‘...sustaining communities with access to services and
facilities’... but these services and facilities do not exist in Burford and: ‘...protecting and enhancing our
environment’... which this proposed development defies.

Paragraph 3.12 states that one of the Plan’s core principles (C10) is to ‘...Ensure that land is not released for
new development until the supporting infrastructure and facilities are secured’. The Plan fails to identify any
improvement to the local infrastructure to support the addition of 85 houses in Burford.

Paragraph 4.14 How has Burford been designated a Rural Service Centre? It has a population of only 1,300,
very poor transport provision and is served by a single small retail food shop which despite paragraph 9.6.15
cannot meet the needs of local residents. Main family shopping has to be done in Carterton or Witney.
Bladon on the other hand has a similar population and much better infrastructure but is classed as a village.

Paragraphs 7.23 and 7.24 highlight the congestion on the A40 between Witney and Oxford caused by a
combination of volume of traffic on a single carriageway road and the pinch points at the Eynsham and
Cassington traffic lights. A further 85 houses lying along the A40 will exacerbate that situation. The proposed
new eastbound bus lane on the narrow A40 without any increase in the width of the road will slow traffic still
further.

Paragraph 9.6.18 recognises that Burford lies in a particularly environmentally sensitive area and falls within
a landscape character area which has been described as ‘...highly attractive, remarkably unspoilt and with a
rural character’. This development threatens the distinct nature of this landscape.

Paragraph 9.6.24 identifies pressure on school capacity and shows the need for improvement in the provision
of primary education. This development only serves to add to these inadequacies.

Summary
**Respondent ID** | **Respondent Organisation** | **Respondent Name** | **Respondent Title** | **Respondent Surname** | **Comment ID** | **Document Full Path** | **Comment (plain text)** |
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MM145 |  | Colin Shubert | Mr | Shubert | 321 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Without prior notice the District’s revised Local Plan 2031 introduces an ill-conceived development of 85 houses in Burford within an Area of Outstanding Natural Beauty (AONB). The proposal rides roughshod over the constraints inherent in this designation. The Plan makes no credible case for the need for additional housing in the Town whose infrastructure is already inadequate to accommodate the existing population. Public transport serving Burford is all but non-existent; the bus service is woefully inadequate, the A40 eastwards is heavily congested and the nearest rail link is 10 miles away. There are few employment opportunities in the Town so that young families have moved away. Afford able housing in these circumstances is inappropriate. The supply of existing homes more than meets the demand so that in the area there are already vacant houses on the market.

For the reasons outlined above I strongly object to the introduction into the District’s Draft Local Plan 2031 of the development of 85 house on land east of Burford.

I wish to object most strongly to the inclusion in the draft local plan of the proposal to develop Cole’s Field on the east side of Burford. While I recognise the pressure on the council to make more housing land available, I feel I must challenge the flawed premise of the plan at this early stage.

Overall the plan appears guided by a desire to spread new housing development evenly across the region. This is a ‘scattergun’ and uninformed approach that fails to take into account the need to protect towns such as Burford, one of Oxfordshire’s and England’s greatest historical and tourist assets.

The proposed location of this prosed development clearly indicates the developers customary desire to ‘infill’ any available land space without sufficient consideration of the drastic effects this would have on the town and its community.

As a relatively new resident of Leaze House, Barns Lane, I object to the planned development on the following specific grounds.

**Local Impact**

The plan proposes unrealistic and unsustainable large increases in the population of a historic small town. A development of this size would increase the population by a realistic estimate of 20% for which the town of Burford does not have the ability to cope, specifically in relation to primary and secondary schools and community services.

**Traffic volume**

The traffic volume through Burford is already excessive for existing needs and the West Oxfordshire plan would exacerbate this to an unsupportable extent. Morning, evening and weekend traffic routinely gridlock the High Street, together with knock-on congestion at the A40/A361 roundabout.

**Traffic Access**

There is no suitable access to Cole’s field Barns Lane, Frethern Close and Swan Lane are very narrow and choked with parked cars. Barns Lane and Swan Lane are particularly narrow and without pedestrian footpaths. Witney Street is a narrow country lane, prone to icing and flooding and unsuitable for likely volumes of traffic movement.

**ANOB impact**
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<tr>
<td>MM148</td>
<td></td>
<td>Dawn Wain</td>
<td>Mrs</td>
<td>Wain</td>
<td>330</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>The proposed development site is within the Cotswold Area of Outstanding Natural Beauty and the burford conservation area. Burford is a historic town with 252 listed buildings and entirely unsuitable for a development of anywhere near the proposed size and character. Overall the current and simplistic and unconsidered plan should be replaced by proper planning strategy that targets developments in a way that has minimum impact upon what are some of our country's most valuable assets. I hope that you will consider these points and reconsider the proposed Burford development.</td>
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We wish to object most strongly to the inclusion in the draft local plan of the proposal to develop Cole’s Field, on the east side of Burford. While we recognize the pressure on the Council to make more housing land available, we feel we must challenge the flawed premise of the plan at this early stage. Overall, the plan appears guided by a desire to spread new housing development evenly across the region. This is a lazy and unformed approach that fails to take into account the need to protect towns such as Burford, one of Oxfordshire's and England’s greatest historical and tourist assets. As residents in Windrush Close for five years, we know the town and the proposed development site very well indeed and object to planned development on the following specific grounds:

**Local impact**
- The West Oxfordshire plan proposes unrealistic and unsustainably large increases in the population of a historic small town.
- A development of 85 homes would permanently bring 250+ new residents and 100+ new vehicles to Burford, a small town with a current population of approximately 1400. This is a proposed expansion of at least 18% to the population – this is a colossal figure and it is impossible to argue that any town would have the infrastructure to cope with such expansion, never mind a historic small town such as Burford.
- The impact on traffic will be severe and outlined below, but many local services would also be insufficient for such an expansion (for example, the primary and secondary schools are already oversubscribed). The proposed development would create a tipping point of increased commercial services, community services, infrastructure and social need that will completely change the town’s character.

**Traffic volume**
- Traffic volume in Burford is already excessive for the existing roads and the West Oxfordshire plan would increase traffic to an unsupportable and dangerous extent.
- Burford High Street is routinely gridlocked during morning and evening rush hours and weekends, and additionally when there is any local event that directs additional traffic along the A40, A424 or A361 (for example, the Cheltenham Festival, Cornbury Music Festival, the Feastival etc). This leads to dangerous, noisy and polluting knock-on congestion at the A40/A361 roundabout and the A40/B4020 junction. The overwhelming majority of new residents created by the proposed development will need to drive outside of Burford to their place of work and will own at least one vehicle, dramatically increasing traffic burden on the town.
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**Traffic access**

- There is no suitable access to a proposed development of Cole's Field.

- Barns Lane, Swan Lane, Frethern Close and Windrush Close are very narrow and choked by parked cars already.

Barns Lane and Swan Lane contain historic and protected buildings, and at points are single-track with no pavement either side, and with a sharp, blind turn at their intersection where there have been several minor (but likely unreported) accidents. Traffic volume and speed is already excessive for these small roads and further increases to traffic volume would be extremely hazardous.

- Witney Street is a narrow country lane prone to icing at the top and flooding at the bottom - the flooding is routine and runs into Windrush Close every time it rains heavily, overloading the drains, and has been significant during every year that I have lived in Burford, and helps to swell the flood on Witney Street. This would inevitably lead future residents to access any development through other unsuitable routes (e.g. Barns Lane, Swan Lane and Frethern Close).

**Flood risk**

- Cole's field slopes steeply to the north and the risk of flooding is obvious. Indeed, as noted previously, Witney Street has flooded significantly during every year that I have lived in Burford.

- Given that the risk of flooding of Witney Street and the properties and roads to the north is currently mitigated by the absorptive capacity of the field, flooding of Witney Street and lower-lying land to the north would be almost inevitable given the loss of absorption and run-off that would be created by a development on Cole's Field.

**AONB impact**

- The proposed development goes against our generational responsibility to protect Oxfordshire’s and the country’s greatest historical and tourist assets.

- The proposed development would fundamentally and irrevocably change Burford, not least destroying the views across the Windrush Valley and the historic Parish Church from the A40 coming from Oxford, and the A424 coming from Stow.

- The proposed development site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is an historic town with 252 listed buildings and entirely unsuitable for a development of anywhere near the proposed size and character. It should be a fundamental premise that we should not degrade Burford Conservation area or any area of Outstanding Natural Beauty – it is everyone’s responsibility to protect our most treasured heritage.

**Lack of consultation**

- There was no prior consultation with Burford Town Council, our District Councillor or the body that manages the AONB. Indeed, the original schedule for display of the development plans included exhibits at Chipping Norton, Carterton, Witney – but not Burford!
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<tr>
<td>MM964</td>
<td>BURFORD TOWN COUNCIL</td>
<td>Burford Town Council</td>
<td>Mrs</td>
<td>Andrews</td>
<td>331</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>Overall, the current simplistic and unconsidered plan should be replaced by a proper planning strategy that targets developments in a way that has the minimum impact upon what are some of our county's most valuable assets. I hope that you will consider these points and reconsider the proposed Burford development, and in so doing prevent irreversible damage being imposed on our most prized heritage.</td>
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<td>MM153</td>
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<td>Bill Risebero</td>
<td>Mr</td>
<td>Risebero</td>
<td>335</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I am writing to comment on your proposal to zone the land to the east of Burford (known I believe as Cole's Field) for housing. To my mind there can be no objection to increasing housing provision in West Oxfordshire, especially if it is genuinely low-cost and affordable. It also seems right that this can and should be done in different ways, including making additions to small settlements. Building on the land in question, however, raises at least four problems which I don– think your Local Plan proposals adequately consider. 1. Conservation. It has been established that development affecting a Conservation Area needs to meet the criterion of ‘enhancement’ as well as that of ‘preservation’. It is by no means clear how this development will enhance either the character or the appearance of the Conservation Area. Indeed, the Local Plan seems to deal only with the question of how its negative effects might possibly be mitigated. 2. Neighbourliness. The site is bordered on three sides by existing housing, and will have a big impact on its neighbours. Houses which at present have a direct relationship with the open landscape will lose it. They will also decline in value. Surely the aim should be to extend the Town on a site or sites which do not diminish the amenities of existing properties. 3. Water table. I have only anecdotal evidence of the existence of springs on the site, and their present use. On the other hand, the Windrush flood plain immediately to the north is well documented. It seems to me that, before the site is designated, a lot of work has to be done to ensure that issues of water supply, of the water table and of flooding are properly investigated. 4. Vehicle access. This seems to me a very difficult issue. As the Plan rightly says, Wysdom Way and Barns Lane are inadequate for anything but the lightest of traffic. But even if most vehicle movement is taken by Witney Street, problems still occur. To get in or out of the area, traffic will still need to use Barns Lane, or the congested junctions with Burford High Street, or the narrow junction connecting the eastbound Witney Street with the A40. Already, developers are coming forward with proposals for the site. In my view, before the site is designated, still less developed, much more investigation needs to take place. This investigation should include looking for alternative sites which meet the housing objectives but don't downgrade the conservation area, nor have an adverse impact on neighbours, nor disrupt the water table, nor overload the surrounding narrow lanes and junctions with traffic.</td>
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| MM156         |                         | David and Sarah Palmer | Mr | Palmer | 338 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field. 

My objection is on the following grounds:

- The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a very historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.
- It will destroy the views across the Windrush Valley and the parish church from both the A40 coming from Oxford and the A424 coming from Stow-on-the-Wold.
- There was no prior consultation with Burford Town Council, or district councillor or the body which manages the AONB.
- The site slopes steeply to the north and there is a clear risk of flooding being caused in the vicinity of Orchard Rise.
- This proposal affects the setting of listed buildings and does not meet the policy requirements for WODC’s protection of heritage assets.
- There is no suitable access.

- Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point.
- Frethern Close, the road is narrow with cars parked all along it, any vehicle larger than a family car has to kerb ride to get through, this is an accident waiting to happen as there are many children and senior members of our community using these pavements. When the Falkland Road Rural Exception development was build, Highways were opposed to increasing vehicular access though Frethern Close.
- Barns Lane, the access via Barns Lane is very narrow (single vehicle) where the access to the development would be sited. There is no way any provision for pedestrians could be incorporated around this access due to high dry stone walling on both sides. This would have the effect of forcing pedestrians and vehicles into the same space on a steep hill.

- The proposed site is the back drop to the St John the Baptist Church when viewed from the north and the framing of the iconic high street from the same direction.

In conclusion, the government states that “Localism” is an objective of theirs, but the District Council has failed to either consult or even inform the local District Councillor or the Burford Town Council that policy BC1b for 85 houses east of Burford would be a proposal in the Local Plan 2031. My Understanding is that this was at best a drive by planning assessment, which given the massive effect this decision could have on a whole community seems a little lazy and disrespectful. The parcel of land in question has been assessed in the recent past to be wholly unsuitable for development (see SHLAA). I am fully aware that the planners are under pressure to find and identify land for future development and that all communities are expected to shoulder their share, but that does not excuse this sort of “Google Maps” town and county planning! With a small amount of investigation (see SHLAA) and a little imagination there are other areas of Burford that are considerably more suitable for future development, some of which contrary to your draft plan are outside the AONB boundary and most of which will not put the future and character of a historic and precious jewel in the crown of the Cotswolds. |
<p>| MM88         |                         | Dianne Taylor | Mrs | Taylor | 346 | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford | I am not in agreement with the above proposed amendment to the WODC Local Plan 2031 for the following reasons. |</p>
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<td>Charlbury</td>
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<td>The proposal for 85 houses is a major development for Burford. It would adversely affect the setting of the historic town and ruin what is, actually, a very natural beautiful valley. The site lies both within the Conservation Area and the AONB.</td>
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<td>With respect, I believe this conflicts with the overall strategy of the West Oxfordshire Local Plan 2031 Proposed Main Modifications which seeks :-</td>
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<td>Point 4.6 “…the protection of designated areas including Green Belt and AONB” and “conserving and enhancing the natural and historic environment”</td>
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<td>These are cited as laudable objectives but</td>
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<td>Point 4.7 goes on to reinforce this by stating as aims:</td>
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<td>“conserving the landscape and scenic beauty of the Cotswolds Area of Outstanding Natural Beauty” and</td>
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<td>“Protection and enhancement of the District’s rich historic and natural environment.”</td>
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<td>The site is not integral to existing development. In order to access this site it is proposed to break in to an adjoining field. By breaking into a separate field there will be pressure to extend the development along the valley.</td>
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<td>Locating Development in the Right Places Point 4.10</td>
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<td>“Putting development in the right places can also help to reduce development pressures on sensitive locations, including the AONB and Green Belt.”</td>
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<td>Indeed, a developer this month proposed a plan to the local community which takes in more of that adjoining field than is shown in the revised local plan. This is evidence of the pressures put on sensitive locations.</td>
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<td>More specifically, Policy BC1b point 9.6.34m states</td>
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<td>“This also presents the opportunity to provide a gateway entrance to Burford from the East. Secondary vehicular accesses may also be achieved from Fretham Close, Wysdom Way to the south and Barns Lane to the west (although the narrow nature of this route would mean a very limited number of dwellings could be served from here).”</td>
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|               |                         |                 |                  |            |                   | With respect, apart from the fact that the site has had to break into a further field to provide a main access point, the proposed access from the east is unsuitable as Whitehill freezes in the winter, as does Witney Street where the proposed access will be. There are Ice Road Traffic Signs at both ends of this minor road. The signpost on the A40 does not mention Burford at all as it is not suitable for heavy traffic use. It only directs motorists to Widford along this route. To create a “new gateway” to Burford along Witney Street, which forms a funnel by becoming one way at the Burford end, seems completely illogical. Also, Burford
already has its Gateway at the top of the Hill on the roundabout at the A40. The Wysdom Way access is also unsuitable due to parked vehicles in Frethern Close and along this route. It has already suffered extra traffic from what was originally intended by the creation of the Affordable Housing on its perimeters.

It has been stated that the Barns Lane access should serve a limited number of dwellings due to the narrow nature of the route. Driving from the A40 down Barnes Lane there are two SLOW signs painted in the road with 40M distance between them. These are just before the proposed access. The Government Publication ‘Traffic Signs Manual 2003’ Point 22.4 states that

“discretion should be exercised in the use of the marking to ensure that its impact is not reduced through proliferation. At particularly hazardous sites the marking may be repeated to give added emphasis”.

This confirms the unsuitability of this area as an access point. The plan does not recognise it as the hazardous site it is which is a narrow, steep north facing hill which freezes in winter and has no footpath.

As a corollary to this, this month a developer exhibited a proposal to the community for this site. They proposed a 60 bed care home and 5 houses be served from this access point. A 60 bed care home would have at least 20 parking spaces and would be accessed day and night by staff and service vehicles and, of course, visitors.

One wonders whether the developer read point 9.6.34m or, indeed, this could be another example of already ‘pushing the boundaries’ to a sensitive location. It does seem inappropriate to present a scheme to the local community when it conflicts in two ways with the Revised Local Plan.

4

There are flatter sites with better road access. I would recommend a development either on the Shilton Road, south of Burford or on the A40 west of Burford near Tanners Lane.

I attended the exhibition on Thursday, 15 December in the Warwick Hall, Burford and would like to make the following comments.

Whilst I do accept that some new housing is required in the Burford area, I do have certain reservations. At present, young people are unable to purchase homes in the town because of the high values – I would therefore like to see affordably priced homes within this development and not executive type, top of the market homes. I feel that there should be a mix of properties – some for older and single people, some for couples (all these with two bedrooms), some for small families, eg 3 bedrooms and some 4 bedrooms but not too large that would put them outside the affordability of local working people.

My main concern regarding the development is the possibility of it causing more flooding problems. I was told at the exhibition that there would be areas within the curtilage to collect water but this must be a top priority in view of the current problems in the town. I live at the bottom of the High Street and the drains are very old and have caused me many problems over the years. In 2007 there was serious flooding at the bottom of the town.

The access onto Barns Lane is very worrying because of the narrowness and the exceptionally steep gradient of the road. I feel that, if it is used, it should be for a maximum of five houses and definitely not for the proposed care home which would involve large service vehicles, staff and visitors accessing the site.
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| MM162        |                        | Richard White  | Dr White         | 351               |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | However, it would be good if a pedestrian access could be made through from the majority of houses to enable residents to walk to the High Street more easily. I am not sure whether the developers are really aware of the gradient as it is referred to as a gentle slope. There is no way this accurately describes it. Similarly, the access via Wysdom Way and Frethren Close would be far from ideal as Wysdom Way is particularly narrow and there are always a good deal of residents’ cars parked in these roads.

The access onto Witney Street, while being the best of the three, seems to be proposed near a bend. Witney Street again is quite narrow with many potholes and the access onto the A40 at the Ramping Cat turn is very difficult, particularly if one wishes to turn Right. It has been said that most people would wish to go East but there is no possible reason to think this must be the case. I know of many people who work in Swindon, Cheltenham, Chipping Norton and Banbury so they would either wish to turn R onto the A40 or go West through the town itself which is already choked with traffic.

Regarding the proposed care home, I do not feel that this site is at all suitable for such a development. Having worked in health and social care for many years, I am very aware of the importance for older people to be able to mobilise as much as possible and access their local facilities. The very steep gradient of the hill would preclude this for most elderly people.

Lastly, I understand that the local primary school is up to or near capacity. Hopefully this development would bring in young families who would wish their children to be educated in the town. I feel it should be a condition, if the development does go ahead, that a substantial contribution is made towards the primary school.

I trust my comments will be taken into account in the decision making. |
infrastructure and social need that will completely change the town's character.

Traffic volume

* Traffic volume in Burford is already excessive for the existing roads and the West Oxfordshire plan would increase traffic to an unsupportable and dangerous extent.
* Burford High Street is routinely gridlocked during morning and evening rush hours and weekends, and additionally when there is any local event that directs additional traffic along the A40, A424 or A361 (for example, the Cheltenham Festival, Cornbury Music Festival, the Feastival etc). This leads to dangerous, noisy and polluting knock-on congestion at the A40/A361 roundabout and the A40/B4020 junction. The overwhelming majority of new residents created by the proposed development will need to drive outside of Burford to their place of work and will own at least one vehicle, dramatically increasing traffic burden on the town.

Traffic access

* There is no suitable access to a proposed development of Cole’s Field.
* Barns Lane, Swan Lane and Frethern Close are very narrow and choked by parked cars. Barns Lane and Swan Lane contain historic and protected buildings, and at points are single-track with no pavement either side, and with a sharp, blind turn at their intersection where there have been several minor (but likely unreported) accidents. Traffic volume and speed is already excessive for these small roads and further increases to traffic volume would be extremely hazardous.
* Witney Street is a narrow country lane prone to icing at the top and flooding at the bottom – the flooding is routine and has been significant during every year that I have lived in Burford, and would prevent access to any new development. This would inevitably lead future residents to access any development through other unsuitable routes (e.g. Barns Lane, Swan Lane and Frethern Close).

Flood risk

* Cole’s field slopes steeply to the north and the risk of flooding is obvious. Indeed, as noted previously, Witney Street has flooded significantly during every year that I have lived in Burford.
* Given that the risk of flooding of Witney Street and the properties and roads to the north is currently mitigated by the absorptive capacity of the field, flooding of Witney Street and lower-lying land to the north would be almost inevitable given the loss of absorption and run-off that would be created by a development on Cole’s Field.

AONB impact

* The proposed development goes against our generational responsibility to protect Oxfordshire’s and the country’s greatest historical and tourist assets.
* The proposed development would fundamentally and irrevocably change Burford, not least destroying the views across the Windrush Valley and the historic Parish Church from the A40 coming from Oxford, and the A424 coming from Stow.
* The proposed development site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is an historic town with 252 listed buildings and entirely unsuitable for a development of anywhere near the proposed size and character. It should be a fundamental premise that we should not degrade Burford Conservation area or any area of Outstanding Natural Beauty – it is everyone’s responsibility to protect our most treasured heritage.
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| MM4  |              | Gordon Elliot | Mr    | Elliot  | 352        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Lack of consultation

* There was no prior consultation with Burford Town Council, our District Councillor or the body that manages the AONB. Indeed, the original schedule for display of the development plans included exhibits at Chipping Norton, Carterton, Witney – but not Burford!

Overall, the current simplistic and unconsidered plan should be replaced by a proper planning strategy that targets developments in a way that has the minimum impact upon what are some of our county’s most valuable assets.

I hope that you will consider these points and reconsider the proposed Burford development, and in so doing prevent irreversible damage being imposed on our most prized heritage. I look forward to your reply.

| MM164 |              | Elizabeth Deverson | -     | Deveron  | 358        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > WEST OXFORDSHIRE DRAFT LOCAL PLAN – POLICY NO. BC1B – LAND EAST OF BURFORD | Re Consultation on Draft Local BC1b

I am wondering if some sort of bias (deliberate or subliminal) has crept into planning considerations for providing extra housing in West Oxfordshire.

I live in Burford and, with other Burfordians, do not understand the apparent support for 85 houses in Cole’s Field, yet not for a similar development off Shilton Road. My reasons are:

Cole’s Field is on a steep slope which gives rise to difficulties with land subsidence/soil erosion and drainage problems.

Shilton Road is on a flat field without these problems.

Cole’s Field has no proper road access. The two narrow lanes earmarked by the developers are known accident spots, subject to flooding and without pavements.

Shilton Road is a classified road with a pavement.

Cole’s Field (as mentioned above) does not provide easy access for those intending to walk into town and disabled or elderly people could be involved.

Shilton Road now has a bus stop very close to the proposed development which would take people right into Burford or Carterton for shopping.

Please do consider these factors carefully before a dreadful planning mistake is made.

I am a resident of Witney Street Burford and have very strong objections to both the proposed development of the field known as Cole’s Field to the east of Barns Lane and the proposal by WODC to make a new “gateway” into the town from the eastern A40 via White Hill into Witney Street.

Development of Cole’s Field
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<td>MAIN 193</td>
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<td>WODC referred to the inclusion of this land in the Local Plan when defending its case against the proposed Shilton Road development, but presumably did not think this site suitable when its original Plan was submitted and most of the reasons that make the former unsuitable also apply to this land. Furthermore, there is a very real danger of run-off causing flooding to the properties downhill from the site and the proposed entrance onto Witney Street would act as a conduit for runoff into a road that already suffers from flooding. The site is currently a cultivated field within the AONB, and an area that has already seen development encroaching on the eastern side. A further development of this size would be vastly out of proportion to the rest of the town and put huge strain on all of its resources. The entrance from the A40 roundabout into Barns Lane is difficult with the current level of traffic, cars frequently come nose to nose on the blind bend, and it is effectively single file traffic, even before it reaches Pytts Lane, which is too narrow for 2 cars to pass in opposite directions. Barns lane does not have pavements past number 6 northwards and descending the hill into Pytts Lane to the junction with Witney Street. There is no room to widen either lane for pavements and the increase in traffic to access the proposed nursing home would be far more than the developer's planning consultants imply, as, in addition to the residents of the houses, there would be staff vehicles, delivery vans, ambulances, medical professionals and family visitors, all increasing the dangers for pedestrian and mobility scooter users, and of course increasing the numbers of those users. Any suggestion to alleviate traffic problems by painting in more yellow lines would lead to an already difficult parking situation for residents of the town. Presumably the difficulties posed by Barns Lane and Pytts Lane is the reason for WODC's proposal to make a new &quot;gateway&quot; into Burford by encouraging traffic along Witney Street. New gateway into Burford White Hill and Witney Street are little more than country lanes. White Hill is a frost pocket which frequently causes accidents: At least 4 cars have skidded off the road in the last 4 years and ended up either in the water meadow (3) or in the bushes (1). Several other vehicles have skidded at the foot of the hill and had to be towed away. People who know this road avoid it when temperatures are low because they know it is very dangerous to descend White Hill when icy, and that Witney Street remains frozen over, becoming a skid hazard during cold spells. The footpath from the water meadows into Witney Street is already dangerous, with cars speeding past very close to walkers. There has been at least one incident where a car has been unable to stay on the road and caused damage to the garage of Roebuck Cottage. If a walker had been passing by at the time, they would have been gravely injured. If traffic was to be increased along this road, the footpath as well as the road would have to be widened in order to protect pedestrians. This would destroy established hedgerows, trees and walls within the AONB. The road appears to be designated as part of the national cycle route. It is regularly used, ie on a weekly if not daily basis, by several groups of cyclists and further traffic would enhance the dangers for this group of users. When traffic is diverted from the A40 it cannot easily pass through the exit of Witney Street onto the High Street, so it backs up and both it and Guildenford become gridlocked within minutes.</td>
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| MM165        |                         | Elizabeth and Edward Mortimer | - | Mortimer 359 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Land to the East of Burford known as Coles Field: a proposal to build 85 houses
As long-time residents of Burford we object most strongly to this planning proposal, which adversely affects our home and neighbourhood.
Access
The proposed access to the development from Witney Street is both dangerous and impracticable. Witney Street (not Witney Road as described in the draft plan) begins at Burford High Street and ends at the junction of White Hill and the road to Swinbrook along the Windrush valley. It is subject throughout to a 7.5 tonne weight limit. White Hill is the steep continuation of the road uphill to the A40, and although it leads directly from there to Burford, it is signposted to Witford to deter traffic precisely because the lane is narrow and unsuited to large vehicles. The junction with the Swinbrook Road is a notorious accident spot, especially in icy conditions because of water run-off from the high ground above.

The proposal to make a “gateway” to the east of Burford is misleading. Witney Street is already the main access to the town from the east, and the site of the slip road leading from it to the proposed development is extremely steep and on a dangerous bend. The west end of Witney Street where it joins the High Street is “No Entry” because the road is too narrow to allow two vehicles to pass each other. The High Street is already clogged with heavy traffic, including HGVs, and is often difficult to enter from Witney Street. More
traffic would lead to tailbacks waiting to emerge. Furthermore, if the main access to the proposed development were from Witney Street, how would the increased traffic from the Chipping Norton and Stow roads get to it? Presumably it would come via Church Lane, already congested where people are going to the car park. These small medieval village streets cannot support the volume of traffic that would be generated by 85 new houses. Other roads which might be used, Swan Lane and Barns Lane, are both narrow and steep, and the lower (northern) end of Barns Lane can only accommodate one car at a time. Frethern Close and Wydrom Way are also small residential streets, not designed for busy through traffic.

The nature of the site

The plan describes the site as "sloping gently" towards the valley, but this is far from the case. It is part of an undulating landscape which falls very steeply down towards the River Windrush, where it runs parallel to Witney Street. If you walk along its northern boundary you are on the level of the roofs of the houses in Orchard Rise, and far above the roof of our house (listed Grade 2) and the Mill off Witney Street. When it rains the water gushes down Swan Lane, across the road, and in spite of a storm drain, down our drive towards the river, washing away the gravel as soon as it is spread. The land, even as close to the river as The Mill House, where we live, is so steep that the back of our house is one floor higher than the front. The river runs along the bottom of our back garden, as with many other houses in the street. If Coles Field were built over there would be no land to absorb the rainfall, and a precarious flooding situation would become impossible to contain. Further along Witney Street towards White Hill there have been months when the water on the road has been 8 or 10 inches deep over fifty or sixty yards. The houses are called Springfield and Spring Cottage because of the abundance of natural springs nearby.

The Area of Outstanding Natural Beauty

Burford is admired for the beauty of its buildings in their lovely setting, where each enhances the other. Views of the town with its fine church spire can be had from high ground in every direction, from the A40 along the ridge, from the road to Stow to the North West and from the road to Chipping Norton above Fulbrook. The proposed development would be visible from all around, destroying the character of the countryside. The proposed access road onto Witney Street would have to be in a deep cutting and would be an ugly scar on the landscape. Such an intrusion into a sensitive, well known and much appreciated area is against government policy for the protection of the AONB.

In short, Coles Field is an unacceptable site for development. The town cannot accommodate the traffic it would generate. Flooding has already caused serious problems to houses beside the bridge, and rendered the car park unusable on several recent occasions. The risk of flooding to many houses in Witney Street would be seriously increased by building over the land above it. The development would damage the AONB, spoiling the famous view of Burford in its setting. Witney Street is already acknowledged to be in need of careful traffic management both by a weight limit and restricted access, and a new road leading steeply down to it on a dangerous bend is out of the question. The amenity of the town will already be diminished by ever greater congestion on the High Street caused by new housing to be built in Shipton and Milton, making access from Witney Street even more difficult.

The idea that such a development would relieve pressure on housing in Oxford city is misguided. Burford is twenty miles away, and congestion on the A40 into Oxford is so bad that it wastes an incalculable number of man hours every day, both at peak times and in between. The alternative route over Swinford Bridge is just as bad, and will be even worse with new housing planned at Eynsham. Burford, on the edge of the Cotswolds
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| MM167         |                         | F. R. Williamson      | -                | Williamson        | 363        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | West Oxfordshire draft Local Plan - Policy no. BC1b

Land east of Burford

I have over thirty years experience of planning matters in Oxfordshire having dealt with such proposals as the Oxford Relief Road through Christchurch Meadow and the route of the M.4 motorway through Otmoor. Both these plans were described at the time as having no alternatives.

I consider this proposal to be just as damaging to the landscape and environment of the County as the above plans were. I draw your attention to the following:-

1. The proposal to include Cole's Field as a site for 85 new houses demonstrates the failure of the authorities to balance the housing need against the well-established policies of preserving the outstanding landscape of this area enshrined in the Cotswold Area of Outstanding Beauty and the Burford Conservation Area. Within these policies, the valleys of the Evenlode and Windrush are fundamental. The part of the Windrush valley affected by this proposal is of outstanding landscape and ecological value which will be severely damaged by any development of this site. Views will be obstructed or changed and the transition from town to country along gentle routes used by walkers, cyclists and motorists will be turned into a sharp divide between town, suburban sprawl and countryside. This part of a valuable piece of our heritage will be urbanised for ever.

2. The infrastructure needed to support such a development is totally inadequate. Barns Lane and Witney Street cannot take additional traffic and would lose their rural quality if enlarged. The stated intention of providing for the 'unmet' housing need in Oxford means that additional traffic will be brought onto the A.40 which is already congested between Witney and Oxford in spite of recent improvements to the Woodstock Road roundabout. There are no agreed proposals to improve this situation and the effect will be to increase the congestion and spread it further west.

3. There are very obvious flooding and drainage implications and the sewerage system is already under pressure.

This site should not be included for housing in the Local Plan. The authorities should be looking at areas to the east of Oxford where such development would be far less harmful to the landscape and where the infrastructure is better suited to cope with the above problems. |
| MM213         |                         | Frances Harding       | Mrs              | Harding           | 366        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | From Frances Harding

Re: Objection to West Oxfordshire draft local plan 2031 – Policy no. BC1b – land on east side of Burford

I wish to object most strongly to the inclusion in the draft local plan of the proposal to develop Cole's Field, on the east side of Burford. While I recognize the pressure on the Council to make more housing land available, I feel I must challenge the flawed premise of the plan at this early stage.

Overall, the plan appears guided by a desire to spread new housing development evenly across the region. This is a lazy and uninformed approach that fails to take into account the need to protect towns such as Burford, one of Oxfordshire’s and England’s greatest historical and tourist assets.
As a resident in Windrush Close for ten years, I know the town and the proposed development site very well indeed and object to planned development on the following specific grounds:

**Local impact**

- The West Oxfordshire plan proposes unrealistic and unsustainably large increases in the population of a historic small town.

- A development of 85 homes would permanently bring 250+ new residents and 100+ new vehicles to Burford, a small town with a current population of approximately 1400. This is a proposed expansion of at least 18% to the population – this is a colossal figure and it is impossible to argue that any town would have the infrastructure to cope with such expansion, never mind a historic small town such as Burford.

- The impact on traffic will be severe and outlined below, but many local services would also be insufficient for such an expansion (for example, the primary and secondary schools are already oversubscribed). The proposed development would create a tipping point of increased commercial services, community services, infrastructure and social need that will completely change the town’s character.

**Traffic volume**

- Traffic volume in Burford is already excessive for the existing roads and the West Oxfordshire plan would increase traffic to an unsupportable and dangerous extent.

- Burford High Street is routinely gridlocked during morning and evening rush hours and weekends, and additionally when there is any local event that directs additional traffic along the A40, A424 or A361 (for example, the Cheltenham Festival, Cornbury Music Festival, the Feastival etc). This leads to dangerous, noisy and polluting knock-on congestion at the A40/A361 roundabout and the A40/B4020 junction. The overwhelming majority of new residents created by the proposed development will need to drive outside of Burford to their place of work and will own at least one vehicle, dramatically increasing traffic burden on the town.

**Traffic access**

- Barns Lane, Swan Lane, Frethern Close and Windrush Close are very narrow and choked by parked cars already.

I am disabled with MS and will not use my car during the weekends. Fear of having to walk more than 20 yards from my gate in Windrush Close, as I am in terrible pain, has already curtailed my enjoyment in leaving my house, because parking spaces are already filled within minutes by the influx of visitors to Burford.

Barns Lane and Swan Lane contain historic and protected buildings, and at points are single-track with no pavement either side, and with a sharp, blind turn at their intersection where there have been several minor (but likely unreported) accidents (I count myself as one of those accident statistics, within the last few months, where a person was looking for an address, and hit the side of my car from Frethern Close as I travelled past it). Traffic volume and speed is already excessive for these small roads and the police have clocked drivers doing 40 miles an hour along Windrush Close. Further increases to traffic volume would be
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<td>MM208</td>
<td></td>
<td>Frank Triggs</td>
<td>Mr Triggs</td>
<td>411</td>
<td>Land East of Burford as detailed in Paragraphs 9.6.34j through to 9.6.34q</td>
<td>I object to this development proposal. It's a fact that any development is going to be contentious. This will be the case for either a minority or a majority of those who feel affected. In this case it is the majority and I</td>
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- Witney Street is a narrow country lane prone to icing at the top and flooding at the bottom – the flooding is routine and runs into Windrush Close, from Orchard Close, every time it rains heavily, overloading the drains which runs into our gardens, and has been significant during every year that I have lived in Burford, and as it flows down, it all helps to swell the flood on Witney Street. This would inevitably lead future residents to access any development through other unsuitable routes (e.g. Barns Lane, Swan Lane and Frethern Close).

Flood risk

- Cole’s field slopes steeply to the north and the risk of flooding is obvious. Indeed, as noted previously, Witney Street has flooded significantly during every year that I have lived in Burford.

- Given that the risk of flooding of Witney Street and the properties and roads to the north is currently mitigated by the absorptive capacity of the field, flooding of Witney Street and lower-lying land to the north would be almost inevitable given the loss of absorption and run-off that would be created by a development on Cole’s Field.

AONB impact

- The proposed development goes against our generational responsibility to protect Oxfordshire’s and the country’s greatest historical and tourist assets.

- The proposed development would fundamentally and irrevocably change Burford, not least destroying the views across the Windrush Valley and the historic Parish Church from the A40 coming from Oxford, and the A424 coming from Stow.

- The proposed development site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is an historic town with 252 listed buildings and entirely unsuitable for a development of anywhere near the proposed size and character. It should be a fundamental premise that we should not degrade Burford Conservation area or any area of Outstanding Natural Beauty – it is everyone’s responsibility to protect our most treasured heritage.

Lack of consultation

- There was no prior consultation with Burford Town Council, our District Councillor or the body that manages the AONB. Indeed, the original schedule for display of the development plans included exhibits at Chipping Norton, Carterton, Witney – but not Burford!

Overall, the current simplistic and unconsidered plan should be replaced by a proper planning strategy that targets developments in a way that has the minimum impact upon what are some of our county’s most valuable assets.

I hope that you will consider these points and reconsider the proposed Burford development, and in so doing prevent irreversible damage being imposed on our most prized heritage. I look forward to your reply.
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<td>MM209</td>
<td></td>
<td>Gail Chrichton</td>
<td>-</td>
<td>Chrichton</td>
<td>412</td>
<td>&gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>concur with Burford Town Councils objections to this proposal regarding access, infrastructure, flooding etc. Issues as documented and put forward by the Town Council. To quote from a publication written in the 18th century - “Burford is a town that time forgot” and as such now prospers as a tourist attraction with a global market. Indeed, it was voted the 6th most idyllic place to live by Forbes magazine (<a href="http://www.telegraph.co.uk/news/newstopics/howaboutthat/5166611/Forbes-ranks-Burford-one-of-the-most-idyllic-places-to-live-in-Europe.html">http://www.telegraph.co.uk/news/newstopics/howaboutthat/5166611/Forbes-ranks-Burford-one-of-the-most-idyllic-places-to-live-in-Europe.html</a>). Why develop this area which impinges on that world renowned beauty and prosperity? There is a perfectly good area of ground to the south that the Town Council are actively pursuing to meet requirements outside the AOB. This would be a far easier and cheaper solution with less direct impact for the majority on this gem of an historic town.</td>
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<tr>
<td>MM212</td>
<td></td>
<td>Geoffrey Pritchard</td>
<td>-</td>
<td>Pritchard</td>
<td>416</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I write to object to the above policy for West Oxfordshire draft local plan for land east of Burford This is an area of Outstanding Natural Beauty and a historic town as part of the Burford Conservation Area and benefits from considerable tourist trade because of this. Should it be developed as you propose, this tourism and monetary benefits would be lost. The infrastructure cannot cope as it is one of the surgeries are already closing, and access and the amount of extra traffic that will be generated will be completely gridlocked down the tiny lanes. I would ask you to reconsider this proposal and consult with the Burford Town Council and the AONB accordingly.</td>
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West Oxfordshire draft local plan – policy no. BC1b – land east of Burford

My objection is on the following grounds:

* The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.
* It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Chipping
* There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB
* The site slopes steeply to the north and there is a clear risk of flooding
* There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars. 6. There is not enough capacity in Burford for primary/secondary school requirements. 7. The surgery be will be overloaded, particularly as one of the surgeries in Witney is closing down. 8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 665 houses a day to Oxford. Adding 85 houses to Burford, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%. |
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| MM214         |                         | Gerard Mcphillips | -                | Mcphillips        | 417        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | West Oxfordshire draft local plan – policy no. BC1b – land east of Burford  
I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole's Field  
My objection is on the following grounds:  
1. The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.  
2. It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton  
3. There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB  
4. The site slopes steeply to the north and there is a clear risk of flooding  
5. Access is unsuitable for such a development. Witney Street is a narrow country lane which is prone to ice up at the top and flood at the bottom. There's a sharp bend at the proposed access point. Frethern Close and Barns Lane are very narrow and are choked by parked cars.  
6. There is not enough capacity in Burford for primary/secondary school requirements.  
7. The surgery be will be overloaded, now that one of the surgeries in Witney is closing down.  
8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 3 buses a day to Oxford. Adding 85 houses to Burford, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and sitting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 15%. |
| MM26          |                         | Gordon Jolly     | Mr               | Jolly             | 418        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | West Oxfordshire Local Plan 2031 – Land East of Burford (85 Homes)  
I am writing with reference to paragraphs 9.6.34j to 9.6.34q of the above document as I wish to highlight a number of issues which I believe should be considered when any decisions about this proposed development are being made.  
As a general comment I would question the suitability of any additional housing in Burford given the historic and scenic nature of the town and the need to preserve its unique character. This unique character is what attracts the very many visitors who ensure the continued economic viability of the town. In the absence of any other major employment opportunities, it is tourism which sustains the town and a modern housing development on the eastern side of the town would do nothing but detract from the town’s attractiveness. Burford would risk people approaching from the east, simply continuing along the A40 when they see a new housing development and conclude that they are just passing another commuter satellite of Oxford or Witney. If new housing capacity is proposed then it should be located away and out of sight from the major |
approaches to the town (A40 / A361), preferably on a small scale utilising infill sites.

I do not intend to specifically discuss the issues raised previously by many others as regards to Burford’s continuing lack of infrastructure capacity e.g. drainage or schooling and medical availability for additional inhabitants, but these would of course apply to this development proposal.

I note with great concern the comments in paragraph 9.6.34m which suggest that there might be an “… opportunity to provide a gateway entrance to Burford from the east.” I can only assume that this would envisage Witney Street becoming a major approach road into the town. I do not believe that this is a sensible course of action for the following reasons :-

* Witney Street is a residential street which comprises a large number of listed buildings. These buildings are very close to the roadway with no pavement on the southern side. Many properties at the western end near the junction with the High Street, front directly onto the roadway with related safety risks from passing traffic even at current levels.
* Witney Street is very narrow particularly at its western end near the High Street where it is only one lane wide (with no access from the High Street) and one-way. This narrowness is exacerbated by the unavoidable need for residents to park their vehicles on both sides of the roadway, which can again reduce the roadway’s width to one lane, especially to the west of the junction with Guildenford.
* Over recent years, Witney Street has become a convenient short-cut or “rat run” for motorists seeking to avoid congestion along the High Street and up and down The Hill. This short cut via Church Lane and Guildenford is particularly busy at peak rush hour times of the early mornings and evenings when traffic volumes and related safety risks (including speeding) increase significantly.
* I believe that the safety concerns highlighted in 1) - 3) above are what prompted Burford Town Council’s (BTC) request to Oxfordshire County Council for a 20mph restriction along Witney Street (refer BTC meeting minutes of 2 November 2016).
* Burford fire station is located on Witney Street and the fire engine has encountered problems on occasions when attempting to urgently travel towards the High Street due to the narrowness of the roadway or the volume of queuing traffic at certain times.
* The buildings in Witney Street (the majority of which are listed) are highly susceptible to vibration from passing vehicles. Increased traffic volumes and perhaps heavier vehicles can only serve to increase the risk of structural damage to these protected, heritage buildings.
* At the eastern end of Witney Street, outside of Burford town itself where it climbs/descends White Hill near the Widford junction, the road is narrow and it is highly susceptible to prolonged icing in the winter months. The road is not suitable for high traffic volumes travelling in both directions. The current signage pointing to Widford is highlighted as “Single Track Road” for this very reason. Signage pointing to Burford from the A40 would not be appropriate.

As per paragraph b) of Policy BC1b within the Local Plan document, there is discussion of potential vehicular access to the proposed housing development from “the Witney Road”. The eastern “gateway” is again mentioned, but I would suggest that my comments above would argue against both of these scenarios. The potential site of any vehicular access would be on a blind bend in the narrow road and it would likely be on a steep slope. Water run off would also be encouraged in an area of the road where flooding has occurred in the recent past.

As a resident of Witney Street I believe that my comments above are highly relevant given that they are based on actual experience. The town of Burford is a unique environment which should be protected, but if new housing development is to be considered then it should only be located where it will have the minimum impact on the town itself and its related traffic management. I urge you to give serious consideration to my
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| MM220         |                         | Hilary Jolly    | -                | Jolly             | 424        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | West Oxfordshire Local Plan 2031 – Land East of Burford (85 Homes)  
I am writing with reference to paragraphs 9.6.34j to 9.6.34q of the West Oxfordshire Local Plan 2031 – Land East of Burford (85 Homes.) I am strongly opposed to this proposal and believe this is the wrong site for development. My main reasons for objecting are set out below.  
* The proposed development is situated within an Area of Outstanding Natural Beauty. This designation has a specific purpose and has, to date, protected against development. This objective should not be abandoned to meet housing targets. The area should be preserved as intended for current and future residents and visitors alike.  
* The proposed access points and the suggestion that Witney Street (Road) becomes a gateway entrance to Burford are inappropriate. Witney Street is a narrow, quiet, residential lane and is home to many listed buildings. Promoting it to a major thoroughfare will severally detract from its character through the increased traffic, pollution and noise and will do nothing to preserve the integrity of the listed buildings and their setting. |
| MM221         |                         | Hilary Palmer Lewis | Mrs | Palmer Lewis | 425        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I wish to object to the inclusion in the draft local plan to allocate 85 new homes on the site East of Burford known as Cole's Field.  
I consider that the proposal will be detrimental to the infrastructure of Burford, namely lack of places in the school, risk of flooding from the run off, overload on the sewerage system, parking and road congestion and there are not sufficient buses.  
Burford has no large housing developments like the one proposed and it is an AONB area and the approach to Burford would be spoiled by a new housing estate which is not in keeping with the beautiful listed buildings. The town is a very popular tourist attraction and the local economy would suffer if people were unable to park. The loss of prime agricultural land would be gone forever. |
| MM223         |                         | Hugh Ellis Rees  | -                | Ellis Rees        | 427        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | We object to the proposal to allow the construction of 85 new houses on Cole’s Field. It would be a major incursion into the eastern boundary of the town. It is clear from the proposal that no proper survey has been made: the top of the site may be ‘gently sloping’, but it rapidly steepens as it runs down to Witney Street.  
Nor has adequate attention been paid to the risk of flooding: the whole area is riddled with springs - hence the name ‘Springfield’ which has been given to the property below.  
Witney Street, the eastern access to Burford, is a winding country lane, liable to flood ing; Frethern Close, above the site, is already choked with residents’ cars; while Barns Lane, which forms the western boundary of the site, could not safely be used for access, since it is very steep and narrow: vehicles have to wait to pass each other, and there is no pedestrian walkway.  
What demand exists in Burford for new housing on this scale? The growth points locally for new housing are Witney and Carterton: Burford’s needs are inconsiderable. It seems as if this would just form another community for commuters, like Bradwell Village, looking mainly towards Oxford, with few links to the local area, and adding to the insatiable daily load on the A40. |
| MM225         |                         | Ian Duncan       | -                | Duncan            | 429        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury | Subject : West Oxfordshire draft local plan – policy no. BC1b – land east of Burford  
I write from my address in France. As the years advance, we rationalise our UK “life components” for the future. As we look back on early memories of Kent, “Garden of England”, and more recent joys in Hampshire, our focus for the future in “England’s green and pleasant land” now returns to areas, well known to us since the late 1950’s, taking us to Oxford and into the Cotswolds, notably on a swathe embracing Witney, Burford, |
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Stow-on-the-Wold, Bicester, Chipping Norton and Rollright.

Though not a “green” lobbyist, I do, however, wish, to object officially to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field.

My objection is rooted in the following points.

- General Historical and Environmental Considerations.
  - a) Without exaggerating, the site and views are on a par with many in Europe, such as the Canal du Midi et la Voie Verte in France, or the mountain village of Rosia Montana in Romania, which have received International and European recognition and protection, including those of the UNESCO World Heritage, i.e. far beyond those of the national Central and Local Governments.
  - b) The Cole’s Field site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.
  - c) The proposed development will destroy the views across the Windrush Valley and the parish church, from the A40 coming from Oxford, the A424 coming from Stow, and from the A361 from Charlbury and Shipton.
  - d) Of course, those who may come to live in the houses may well have the pleasure of wonderful surrounding scenery, and picturesque views, while destroying those of to-day’s inhabitants. But there would be major drawbacks for the occupants of those proposed 85 additional Burford households, too.

- Fundamental Regulatory Aspect: Infringement of Rules and Normal “Best Practice”.

There was no prior consultation with:

- Burford Town Council,
- the district councillor
- or the body tasked with the management of the above-mentioned AONB.

- Geographical & Logistical Inconveniences and Natural Climatic Risks.
  - a) The site slopes steeply to the north and there is a self-evident risk of flooding.
  - b) Access is poor:

  - Witney Street is a narrow country lane which is prone to icing up at the top;
  - and flooding at the bottom,
  - and bends sharply at the proposed point of access.
  - Frethern Close and Barns Lane are also narrow, and are always blocked by parked cars.

- Social and Infrastructural Issues.
  - a) Schooling: there is insufficient capacity in Burford for primary & / or secondary school needs.
  - b) Medical:

  - the local surgery, already stretched, be will soon be highly overburdened, owing to the inevitable repercussions of the imminent closure of one of the surgeries in Witney.

- Perverse, Inequitable Effects on Burford owing to:

  - Related Planning & Social Issues, with Upheaval and High Knock-On Costs.
The proposed revision of the original plan:
- which is a clear result of the need for additional housing for the city of Oxford,
- envisages / suggests 40 houses in Charlbury, a town with a population of just under 3000 (1298 households), and already equipped with a fast, efficient rail connection to Oxford.
- This proposal would modestly increase the number of households in Charlbury by about only 3%....
- In contrast, Burford, a far smaller town, with a population of just over 1000 (665 households), is equipped with only 3 buses per day to Oxford.
- On the basis of this clear, factual and objective comparison, an addition of 85 houses to the 665 households in Burford, would represent an increase of some 13% to Burford.
- Burford already suffers from an oversubscribed Primary School, a failing sewerage system, and a notorious lack of parking facilities.
- In both local and outside eyes, the situating of these proposed 85 houses, proportionally a large number, for Burford, already severely lacking in Public Transport facilities, seems out of proportion, and neither reasonable nor sustainable.
- In truly comparative terms, the above increase of 13% in the number of households for Burford represents 4 times the percentage increase in households that is planned for Charlbury.

On the basis of the foregoing, it is arguable that this objection, and any others like it, are understandable, reasonable, fully founded, and sustainable.

Re: Proposed development on Cole's Field, southeast of Burford

Dear Sir/Madam,

As a resident of Burford, as well as a tentative and amateur historian of this place, I am writing to express my profound opposition to the proposal of development on Cole's Field in the southeast of the town.

I know that a number of my fellow Burfordians have written to you to express their opinions on this matter. I understand that my friend Mr R Simmons of Frethern Close has provided detailed specific objections on the grounds of the physical geography of the site, not least the very significant issues with the proposed access points. I believe that he has also drawn attention to the presence of bats in the field which obviously raises critical conservation issues, but more of that later. I fully support and echo Mr Simmons' points, so I don't feel that there is need for repetition here.

My argument against the proposed development also encompasses the unique nature of the town of Burford and the landscape in which it nestles. Burford is no 'ordinary' small market town. It is not only an almost unique survival of an unspoilt mediaeval town, but it occupies a pivotal place in the deep history of our nation. It only survived in its present form because its location prevented it receiving a railway station, and so during the nineteenth century, Industrial Revolution modernisation completely passed it by. After the Great War, visitors in their new motor cars suddenly discovered this unspoilt time capsule, a medieval town that had been pickled in aspic, an architectural and cultural gem sitting in an Oxfordshire valley of quite breathtaking natural beauty.

I quote from 'Burford, the Official Guide', William J Monk - 1923:

"It is at once obvious to the visitor to Burford that it is no ordinary town. One expects to find unspoilt beauty in the Cotswolds if anywhere in England, but Burford has a character quite its own, quiet and unspoilt with a mellow atmosphere of other days. Where can one match the steep main street, lined by ancient stone-built houses of different periods, each carefully designed by some forgotten architect-builder? Or where can a more interesting church be found, even in the Cotswolds, an area well known to every ecclesiologist? This..."
Building has been well called the "Westminster Abbey of the Cotswolds" (even as Cirencester Church is often known as the "Cathedral of the Cotswolds") for its architecture - ranging from Norman to Perpendicular, mediaeval fittings and historical associations.

But what of Burford as a place in which to sojourn awhile? It can be summed up in one word - ideal! There is up-to-date hotel accommodation, where every modern comfort is provided amid charming surroundings, good and pure water supply, efficient public services, and the local shopping facilities are surprisingly up to date to meet all reasonable requirements. As a residential centre Burford is unsurpassed and there are delightful properties to be had from time to time. Finally, Burford is an excellent centre from which to explore the delightful country hereabouts."

And since Monk was writing, nothing has changed. By the 1920s Burford made its living mainly from tourism, as it still does. From my study window I can see small armies of visitors in coaches coming here from the USA, Japan, China, and so endlessly on. But they come here not just for the town itself, but for the achingly beautiful vistas into the valley, both from the southern ridge where the A40 runs and from the northern approaches from Stow and Chipping Norton. The size and location of this development, high on the southeast face of the valley, would make it a ruinous carbuncle on this perfect landscape.

Which brings me to what is possibly Burford's biggest issue: traffic. In 'The Burford Records: A Study in Minor Town Government', written in 1920, R. H. Gretton tells us that the street layout that we see today is almost precisely as it was soon after the town received its Charter (1088 or 1100 depending upon which chronicler one chooses to believe, but either way exceptionally early). These mediaeval streets are choking in traffic. Indeed, in the 1930s there actually was a serious proposal to demolish the 16th Century building that is now Burford House Hotel and Tea Rooms (edge of Witney St) and Reavley's Pharmacy (edge of Sheep St), to alleviate the traffic congestion that they had then. The limits of Burford's capacity to take traffic was reached and breached eighty years ago. The effect of any further population addition defies decent consideration.

Which brings me on to the proposed access points to this development. Witney St is simply the Anglo-Saxon drovers' road to Witney, with the addition of tarmac. Barns Lane, leading onto Pytt's Lane, was originally a trackway from the southern ridge to allow shepherds to drive their flocks down to the Guildenford to water them. So the access points are a Saxon drovers' path that is on the flood plain and a mediaeval sheep track. Genius!

I’ll now like to offer a conjecture on the aforementioned bat colony that feeds in Cole’s Field and presumably roosts nearby. According to Gretton, in the Burford Survey of 1552. Pytt’s Lane was originally called Batts Lane. I cannot prove the etymology of the name, but it was very common to name lanes and byways after animals associated with them, or which the paths lead to; Swan Lane once lead to the river, Sheep Street was so named for the sheep pens outside the tenements and messuages there. It is, I feel, not too fanciful to think that it was named for a large bat colony that persists to this day. If that is the case, that is a very ancient, ancestral colony that the developers propose to cover in concrete.

In summary, this development is unworkable, untenable and unwanted. If there were an award for the most absurd building proposal of 2016, I will freely admit that Mr Trump’s southern border wall would win easily, but this more proximate nonsense would be a clear second. The difference is that Mexico is supposed to pay for Trump’s wall; this development will be paid for by the people of Burford, and its cost will be dear indeed. I understand the need for more housing, that is a given, and I know that a mindset of ‘not in my back yard’ is prevalent almost everywhere. But this is not just any backyard. This town, its landscape and its community is nothing short of a national treasure. In his book ‘England's Thousand Best Churches’, Simon Jenkins put Burford church in his top 20, calling it "The Queen of Oxfordshire; a paragon and museum of the English..."
parish church. Well, Burford is a paragon and museum of the English rural market town.

If approved, this development would be a betrayal not only of the present people of Burford, but of its deep past and possible future. Whether one is a visitor from overseas, a tourist from another part of the UK or a lifelong resident descended from generations of Burford townsfolk, we are all of us just passing through this wonderful place. It is all our responsibilities to nurture, cherish and protect Burford and the Windrush valley, and pass it on unspoilt in perpetuity for the generations to come to enjoy and wonder at.

I urge the Planning Policy Team to unequivocally reject this proposal.

Many thanks for your time and consideration in reading this essay. If you wish to discuss further any of the issues that I have raised, or even discuss the astonishing heritage of Burford and its landscape, please feel free to call me on 07773 444236.

I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field

My objection is on the following grounds:

* The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.
* It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton
* There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB
* The site slopes steeply to the north and there is a clear risk of flooding
* There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethren Close and Barns Lane are also narrow and are choked by parked cars. 6. There is not enough capacity in Burford for primary/secondary school requirements. 7. The surgery will be overloaded, particularly as one of the surgeries in Witney is closing down. 8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 3 buses a day to Oxford. Adding 85 houses to Burford, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%.

Yesterday I went to a presentation of a proposal to put houses in Burford, with the main access along White Hill which comes off the A40 into Burford. I understand that the developers plan to make this lane a main entry into Burford, and that this has found its way into the draft local plan for WODC.

I am not sure if you are aware of this suggestion and am writing now to bring it to your attention.

I would like to make the following observations about making this lane into a main access road.

White Hill is basically a steep, narrow country lane, with a very narrow egress into the High St, between two...
medieval buildings, one of them Walkers Stoves and the other the Burford House Hotel. It can quickly become blocked, as for example now, when the dustbin lorry comes down. With more traffic this would of course be a constant problem.

Driving down off the A40 can be awkward, sometimes with lorries dashing past on both sides as you wait in the middle of the road. It would present problems if there were a longer queue to drive down the road, for example the centre lane would need to be a lot longer. Is this possible? Safe?

The lane is used a lot for recreation. Walkers, often in groups, dog walkers, cyclists singly or in groups, horses, all have to keep in to the verge. It feels very unsafe when cars come along fast, as the verges are narrow. Many cars drive fast as there is no speed restriction, and many locals have had a near miss going along the lane. It is very important to the town to have this recreational use, and in fact the walking route which goes from the town round to Widford and Swinbrook along the road is extremely well used and popular, with people walking on it every day.

White Hill is steep. Cars regularly come off the road, on their way down from the A40, crashing through the stone wall and ending up in the field. On one occasion a car crashed into the garage of one of the houses (Roebuck Cottage). This is worse in winter as it is often frosty at the top of the road which adds to the danger. Locals do not use this road in bad weather. There is also a nasty frost hollow at the bottom of the hill, close to the white gates, and many of us have slithered there on a cold morning.

The lane is subject to flooding and there are a lot of springs along it on both sides. Also, in the event of more houses appearing on the slopes above the road, where would all the ground water go? If it trickled or cascaded down onto the road it would create a hazard.

House owners along Witney St park on the road. This means that Witney St is effectively a single lane road on occasion. If drivers decided to go along Gueldenford to get to the High St they would also find it narrow, with parking on both sides, as there is no other parking place for residents. It is already a chicane on many occasions. In addition, the car park, at the end of Gueldenford, has no easy walking route into town. People walk along the road past the church where there is no pavement. Therefore, any extra cars would add to the hazard.

If more cars came down Witney St with the inevitable queue to get on to the High St, the Fire Engine would be unable to get out in an emergency.

The other proposed access is along Barns Rd. This is also narrow and steep, with no pavement. Coming down this road on foot is hazardous where the road narrows with a wall on both sides. It does not make sense to me to suggest this as a pedestrian access, or an access road for cars.

I assume that you will have a view of this proposal and I urge you to contact WODC to discuss the implications of making Witney St a main entrance to the town, and using Barns Lane as a throughfare.

I would like to make a strong objection to the proposal for the development of 85 new houses on the land east of Burford for the following reasons:

Flooding risk.

Orchard Rise is located right below the field in which the new development is proposed. Extra housing and a
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| MM237        |                         | John Collingwood | -               | Collingwood       | 443       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | As a graduate of Oxford University in 1963 and with a father-in-law still resident in North Oxford, I was horrified to learn of the proposed draft plan for a housing development in Burford.

My wife and I have occasion to visit Oxford on a very regular basis and have friends in the surrounding villages which are of both historic value and situated in an area of natural beauty.

This is a classic example of ill thought out planning and I felt I had to add my voice in support of the local residents in their quest to ask you think again and reject the current proposal.

Specifically, my objection is to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field.

My objection is made on the following grounds:

* The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area of Outstanding Natural Beauty and the Conservation.

Burford is an extremely attractive, unspoilt Medieval town with huge rural character and a big magnet for tourists, both international and British, as many of the buildings are listed with deep historical significance. Development on the proposed scale will ruin the views into the town and just turn it from what is currently a very popular tourist attraction into yet another modern housing estate.

I urge you to reject this proposal.

Access.

Access to the proposed site down White Hill and along Witney Street is a huge concern for the safety of local residents.

It would actually be incredibly dangerous to have the primary vehicular access from the East, with the suggestion that this way will become the new gateway into Burford.

Witney Street is a very narrow winding road which is in poor condition and is already quite dangerous around the entrance to it from the A40, especially at night and in the Winter when it freezes.

The proposed new access road off Witney Street onto the new housing development is right on a bend and also up a very steep slope (not a gentle slope as indicated in the proposal). All the additional traffic created from the proposed 85 new homes will only make Witney Street even more dangerous than it already is, especially for the numerous cyclists and rambler who use it regularly, in addition to all the motor traffic.

Furthermore, further along the road, closer to the High Street, it becomes narrow and is actually only one way and there are a number of beautiful historic buildings alongside it. Encouraging more and more traffic along this road is just not sensible.

* The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area of Outstanding Natural Beauty and the Conservation.

Burford is an extremely attractive, unspoilt Medieval town with huge rural character and a big magnet for tourists, both international and British, as many of the buildings are listed with deep historical significance. Development on the proposed scale will ruin the views into the town and just turn it from what is currently a very popular tourist attraction into yet another modern housing estate.

I urge you to reject this proposal.

Road will affect the ability of the field to absorb water as there is already a high water table on the land due to natural springs. Also, during periods of heavy rain even Witney Street floods due to the volume of water running down the very steep slope. Concreting over a lot of Cole’s field will only make this worse as the water will just run off down the steep hill and onto Witney Street which has already been flooded several times in the last few years.

Area of Outstanding Natural Beauty and the Conservation.
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| MM245 | Co-owner Maple Barn Barns Rd Burford OX18 4NE | Joshua Kuperard | - | Kuperard 451 | Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.  
* It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton  
* There has apparently been no prior consultation with Burford Town Council, the district councillor or the body which manages the AONB  
* The site slopes steeply to the north and there is a clear risk of flooding  
* There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars. 6. There is not enough capacity in Burford for the extra primary/secondary school requirements that would arise. 7. The surgery be will be overloaded, particularly as one of the surgeries in Witney is closing down. 8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 3 buses a day to Oxford. Adding 85 houses to Burford, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%. |

Re: Objection to West Oxfordshire draft local plan 2031 – Policy no. BC1b – land on east side of Burford

I wish to object most strongly to the inclusion in the draft local plan of the proposal to develop Cole’s Field, on the east side of Burford. While I recognize the pressure on the Council to make more housing land available, I feel I must challenge the flawed premise of the plan at this early stage.

Overall, the plan appears guided by a desire to spread new housing development evenly across the region. This is a lazy and uninformed approach that fails to take into account the need to protect towns such as Burford, one of Oxfordshire’s and England’s greatest historical and tourist assets.

As a co-owner of Maple Barn, Barns Lane, I know the town and the proposed development site very well indeed and object to planned development on the following specific grounds:

### Local impact

* The West Oxfordshire plan proposes unrealistic and unsustainably large increases in the population of a historic small town.
* A development of 85 homes would permanently bring 250+ new residents and 100+ new vehicles to Burford, a small town with a current population of approximately 1400. This is a proposed expansion of at least 18% to the population – this is a colossal figure and it is impossible to argue that any town would have the infrastructure to cope with such expansion, never mind a historic small town such as Burford.
* The impact on traffic will be severe and outlined below, but many local services would also be insufficient for such an expansion (for example, the primary and secondary schools are already oversubscribed). The proposed development would create a tipping point of increased commercial services, community services, infrastructure and social need that will completely change the town’s character.

### Traffic volume

* Traffic volume in Burford is already excessive for the existing roads and the West Oxfordshire plan would...
Increase traffic to an unsupportable and dangerous extent.

* Burford High Street is routinely gridlocked during morning and evening rush hours and weekends, and additionally when there is any local event that directs additional traffic along the A40, A424 or A361 (for example, the Cheltenham Festival, Cornbury Music Festival, the Feastival etc). This leads to dangerous, noisy and polluting knock-on congestion at the A40/A361 roundabout and the A40/B4020 junction. The overwhelming majority of new residents created by the proposed development will need to drive outside of Burford to their place of work and will own at least one vehicle, dramatically increasing traffic burden on the town.

Traffic access

* There is no suitable access to a proposed development of Cole's Field.
* Barns Lane, Swan Lane and Frethern Close are very narrow and choked by parked cars. Barns Lane and Swan Lane contain historic and protected buildings, and at points are single-track with no pavement either side, and with a sharp, blind turn at their intersection where there have been several minor (but likely unreported) accidents. Traffic volume and speed is already excessive for these small roads and further increases to traffic volume would be extremely hazardous.
* Witney Street is a narrow country lane prone to icing at the top and flooding at the bottom – the flooding is routine and has been significant during every year that I have lived in Burford, and would prevent access to any new development. This would inevitably lead future residents to access any development through other unsuitable routes (e.g. Barns Lane, Swan Lane and Frethern Close).

Flood risk

* Cole's field slopes steeply to the north and the risk of flooding is obvious. Indeed, as noted previously, Witney Street has flooded significantly during every year that I have lived in Burford.
* Given that the risk of flooding of Witney Street and the properties and roads to the north is currently mitigated by the absorptive capacity of the field, flooding of Witney Street and lower-lying land to the north would be almost inevitable given the loss of absorption and run-off that would be created by a development on Cole's Field.

AONB impact

* The proposed development goes against our generational responsibility to protect Oxfordshire's and the country's greatest historical and tourist assets.
* The proposed development would fundamentally and irrevocably change Burford, not least destroying the views across the Windrush Valley and the historic Parish Church from the A40 coming from Oxford, and the A424 coming from Stow.
* The proposed development site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is an historic town with 252 listed buildings and entirely unsuitable for a development of anywhere near the proposed size and character. It should be a fundamental premise that we should not degrade Burford Conservation area or any area of Outstanding Natural Beauty – it is everyone's responsibility to protect our most treasured heritage.

Lack of consultation

* There was no prior consultation with Burford Town Council, our District Councillor or the body that manages the AONB. Indeed, the original schedule for display of the development plans included exhibits at Chipping Norton, Carterton, Witney – but not Burford!
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<td>MM248</td>
<td></td>
<td>Judy Burdall</td>
<td>-</td>
<td>Burdall</td>
<td>456</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>Overall, the current simplistic and unconsidered plan should be replaced by a proper planning strategy that targets developments in a way that has the minimum impact upon what are some of our county’s most valuable assets. I hope that you will consider these points and reconsider the proposed Burford development, and in so doing prevent irreversible damage being imposed on our most prized heritage. I look forward to your reply.</td>
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<td>MM252</td>
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<td>Karen Plant</td>
<td>-</td>
<td>Plant</td>
<td>462</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field My objection is on the following grounds: * The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character. * It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton * There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB * The site slopes steeply to the north and there is a clear risk of flooding * There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Fretherne Close and Barns Lane are also narrow and are choked by parked cars. 6. There is not enough capacity in Burford for primary/secondary school requirements. 7. The surgery be will be overloaded, particularly as one of the surgeries in Witney is closing down. 8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 3 buses a day to Oxford. Adding 85 houses to Burford, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%.</td>
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<td>MM253</td>
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<td>Karl Hayden</td>
<td>-</td>
<td>Hayden</td>
<td>463</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford</td>
<td>I wish to object to the draft local plan for 85 new homes East of Burford, known as Coles Field. Please see objections below. * a) The proposed site is situated within the Cotswold Area of Outstanding Natural Beauty, and within the Burford Conservation Area. Burford has 252 listed buildings and is not suited to this type of development.</td>
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| MM41         | Ashford                 | Mrs Twelves         |                  | 468               | Charlbury Sub Area > MAIN 193 | * b) Where is the consultation period, between the developer and Burford Town Council before any plans or revisions were submitted?  
* c) It will completely change and destroy the views across the the Windrush Valley, church from the A40 and A424.  
* d) No suitable access for the proposed site as Witney street is a very narrow lane and floods in winter time, and very icy.  
* e) Drainage issues for the proposed dwellings, Orchard rise residents could face issues with flooding or subsidence, also no consultation with a Hydrologist on the direct impact it will have on the area.  
* f) No extra amenities provided for, as Burford primary school is full, where will the kids go, Carterton?  
g) The local doctors surgery is full, again where will the people find a local doctor?  
I would also like to comment that the proposed dwellings for this area which covers Carterton, where vast amounts of homes have already been built? why would you need extra property in Burford to fulfil the local need, the proposed houses will be priced at local market value and out of reach of first time buyers. Again another ploy by the developer to maximise return with not care of the local environment/community impact. |
| MM257        | Ken and Jenny Sparrowhawk | - Sparrowhawk       |                  | 469               | Charlbury Sub Area > MAIN 193 | I am writing to you following my discussions with an expert Hydrologist concerning the runoff water from the proposed development of Cole’s field in the draft housing plan issued this month. The access road from the site onto Witney Street is on a steep slope and will have to be drained. There is no drainage along Witney street and it could not cope with extra water from the new road. I would strongly object if it is proposed by a developer to divert the water across or under the road onto my land and down to the river.  
The expert had real concerns about the suitability of the site to deal with the water drainage issue.  
I hope you will take this email into consideration when looking at where to allocate housing in Burford. |
<p>| MM258        | Lady Morse              | Lady Morse          |                  | 471               | Charlbury Sub Area &gt; MAIN 193 | I am writing to object to your local plan to build 85 houses on Cole’s Field, on the eastern boundary of Burford. This will completely overweight our beautiful medieval town and destroy our treasured view across the Windrush valley coming from Oxford. Very importantly there is no suitable access to the site, which is vulnerable to flooding. I beg you to reconsider your proposal and find a more suitable site for your houses, and not to destroy an area that is precious to us all. |
| MM265        | Louise Oliff            | Miss Oliff          |                  | 478               | Charlbury Sub Area &gt; MAIN 193 | I am writing to formally object to the proposal to build 85 new homes and an extra care facility on the area known as Cole’s Field, which is an area of land to the east of Burford. |</p>
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| MM28          |                         | Martin Cash     | -mr              | -cash             | 489        | LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Re: Policy No BC1b on West Oxfordshire draft local plan. As a long term resident of Burford I object entirely to this proposal on the following grounds. Coles Field is essentially an embodiment of the country life associated with living in this beautiful medieval town. I am a frequent walker and this area is used by myself and my family, as well as many other local and visiting people. It is essential for the local community to protect and preserve the area and all the wildlife that lives there. The proposed site is within the Cotswold Area of Outstanding Natural Beauty and also within the Burford Conservation Area. It is imperative that that the historical significance and cherished, unique landscape is safeguarded. To allow this building work would be fully intrusive and destroy the countryside views from all directions and furthermore would have a very negative impact on the beautiful character of the land surrounding us. Needless to say the impact on the local community would be devastating. The proposed development would require access in and out, which would involve using the narrow country lanes at the bottom of the field which lead into Burford via Witney Street. This is already a dangerous road that floods and can be very treacherous in winter when it freezes. There is a double bend in both directions which, with increased traffic, would prove even more hazardous. Witney Street has many residents’ parked cars and, as a tourist destination, is always congested. This has an impact on the Burford Fire Service who are regularly called out during the daytime from their station and have to navigate around parked cars to get out and attend the requested emergency. There is also permanent congestion in Frethern Close with resident’s parked cars, and using this as an additional access area is totally unsuitable. Barnes Lane is also narrow, congested and unsuitable for use. The development would bring at least another 85 cars, if not double that, and it is impossible for the infrastructure, which is already overstretched, to cope. I have lived on The Hill for almost 20 years and can see, on a daily basis, how the level of traffic impacts on our town, the community and the already stretched services. Introducing a large number of new residents would make it impossible for the town services to cope. The Burford Surgery, for one example, is already too busy to deal with the current residents. I can see no positive aspects to this development and wish for my views to be formally known and considered. Dear Sir/ Madam Burford-Chalbury sub area. I’m making an initial response to your proposed plan concerning the development of 85 houses to the east of Burford. I’m particularly concerned by the track changes set out in the revised plan. Clearly these changes have softened your initial impact analysis in order to crudely reduce the obstacles to the plan’s implementation. Whilst recognising the huge pressure on WODC to make more housing land available, it is imperative to challenge the plan’s flawed premise at these early stages. Overall, the plan appears guided by a ‘let’s spread the load equitably across the region’ rather than ‘let’s...
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| MM281         |                         | Maytal Kuperard | -              | Kuperard           | 495        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Re: Objection to West Oxfordshire draft local plan 2031 – Policy no. BC1b – land on east side of Burford
I wish to object most strongly to the inclusion in the draft local plan of the proposal to develop Cole’s Field, on the east side of Burford. While I recognize the pressure on the Council to make more housing land available, I feel I must challenge the flawed premise of the plan at this early stage.

Overall, the plan appears guided by a desire to spread new housing development evenly across the region. This is a lazy and uninformed approach that fails to take into account the need to protect towns such as Burford, one of Oxfordshire’s and England’s greatest historical and tourist assets.

As a co-owner of Maple Barn, Barns Lane, I know the town and the proposed development site very well indeed and object to planned development on the following specific grounds:

Local impact
- The West Oxfordshire plan proposes unrealistic and unsustainably large increases in the population of a historic small town.
- A development of 85 homes would permanently bring 250+ new residents and 100+ new vehicles to Burford, a small town with a current population of approximately 1400. This is a proposed expansion of at least 18% to the population – this is a colossal figure and it is impossible to argue that any town would have the infrastructure to cope with such expansion, never mind a historic small town such as Burford.
- The impact on traffic will be severe and outlined below, but many local services would also be insufficient for such an expansion (for example, the primary and secondary schools are already oversubscribed). The

target our needs in a way that makes the minimum of impact upon our county’s most valuable assets'.

My key arguments for not going further with the proposal to the east of Burford comprise:
* The fundamental premise of do not be responsible for degrading Burford Conservation area or any area of Outstanding Natural Beauty - it is everyone’s responsibility to protect our most treasured heritage.
* Our generational responsibility to protect Oxfordshire’s and the country’s greatest historical and tourist assets.
* Avoiding 1 and 2 above by not imposing the profound impact of increasing the population of Burford by some 20%.
* Creating a tipping point of increased commercial services, community services, infrastructure and social need that will completely change the town’s character.
* Compound the already damaging traffic, parking and associated noise and air pollution problems associated with this area of the A40 and Burford High Street.
* Create traffic mayhem in already difficult roads (such as Witney Street, Barns Lane, Swan Lane, Frethern Close and Orchard Rise) - many of these streets with historic buildings are only one carriageway with no pavements.

I do hope that just modest reflection will cause you to change the simplistic basis of this plan and prevent irreversible damage being imposed on our most prized heritage.

Regards
Martin Cash
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proposed development would create a tipping point of increased commercial services, community services, infrastructure and social need that will completely change the town's character.

Traffic volume

- Traffic volume in Burford is already excessive for the existing roads and the West Oxfordshire plan would increase traffic to an unsupportable and dangerous extent.

- Burford High Street is routinely gridlocked during morning and evening rush hours and weekends, and additionally when there is any local event that directs additional traffic along the A40, A424 or A361 (for example, the Cheltenham Festival, Cornbury Music Festival, the Feastival etc). This leads to dangerous, noisy and polluting knock-on congestion at the A40/A361 roundabout and the A40/B4020 junction. The overwhelming majority of new residents created by the proposed development will need to drive outside of Burford to their place of work and will own at least one vehicle, dramatically increasing traffic burden on the town.

Traffic access

- There is no suitable access to a proposed development of Cole's Field.

- Barns Lane, Swan Lane and Frethern Close are very narrow and choked by parked cars. Barns Lane and Swan Lane contain historic and protected buildings, and at points are single-track with no pavement either side, and with a sharp, blind turn at their intersection where there have been several minor (but likely unreported) accidents. Traffic volume and speed is already excessive for these small roads and further increases to traffic volume would be extremely hazardous.

- Witney Street is a narrow country lane prone to icing at the top and flooding at the bottom – the flooding is routine and has been significant during every year that I have lived in Burford, and would prevent access to any new development. This would inevitably lead future residents to access any development through other unsuitable routes (e.g. Barns Lane, Swan Lane and Frethern Close).

Flood risk

- Cole's field slopes steeply to the north and the risk of flooding is obvious. Indeed, as noted previously, Witney Street has flooded significantly during every year that I have lived in Burford.

- Given that the risk of flooding of Witney Street and the properties and roads to the north is currently mitigated by the absorptive capacity of the field, flooding of Witney Street and lower-lying land to the north would be almost inevitable given the loss of absorption and run-off that would be created by a development on Cole's Field.

AONB impact

- The proposed development goes against our generational responsibility to protect Oxfordshire's and the country's greatest historical and tourist assets.

- The proposed development would fundamentally and irrevocably change Burford, not least destroying the views across the Windrush Valley and the historic Parish Church from the A40 coming from Oxford, and the A424 coming from Stow.
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| MM282         |                         | Michael Simmie  | Mr Simmie        | 496        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | - The proposed development site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is an historic town with 252 listed buildings and entirely unsuitable for a development of anywhere near the proposed size and character. It should be a fundamental premise that we should not degrade Burford Conservation area or any area of Outstanding Natural Beauty – it is everyone’s responsibility to protect our most treasured heritage.

Lack of consultation

- There was no prior consultation with Burford Town Council, our District Councillor or the body that manages the AONB. Indeed, the original schedule for display of the development plans included exhibits at Chipping Norton, Carterton, Witney – but not Burford!

Overall, the current simplistic and unconsidered plan should be replaced by a proper planning strategy that targets developments in a way that has the minimum impact upon what are some of our county’s most valuable assets.

I hope that you will consider these points and reconsider the proposed Burford development, and in so doing prevent irreversible damage being imposed on our most prized heritage. I look forward to your reply. |
| MM286         |                         | Michael Graham  | Mr Graham         | 501        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I would like to object to the allocation of 85 houses to Cole’s Field.
Burford is a medieval historic town in an area of outstanding beauty.
The character should be preserved as far as possible because it is unique.
The infrastructure is inadequate to sustain any further big development particularly as it is a tourist centre and the traffic problems are already obvious.
Please retain the present character of the town as once enlarged it will become another outsized housing estate like Eynsham Witney and Charlbury and preserve it as a gem of the Cotswolds.

Yours faithfully, |

The sections relating to Burford area provoke the following comments:

Proposed 85 houses fails to “conserve or enhance heritage or assets”

Fails to guarantee sufficient infrastructure investment - wording says “seek to ensure” that such investment is made which is completely meaningless and makes no-one accountable for delivery

Refers to need for school capacity already in the town - but needs to be a condition that no development work is completed before such capacity is available, resourced with staff and funded

Fails to meet requirement of “enhancing public transport provision to reduce car usage” - does the opposite by drawing major traffic flow across A40 and down Whitehill by Ramping Cat - dangerous anyway as I know from crossing the carriageway due to speed and volume of traffic on A40, and onto and exiting minor road that is already overused as rat-run. Burford has only one bus service and so if there is no provision of new service from new developments direct to Witney and Cheltenham, then this aspiration will just disappear into the ether.
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<td>MM289</td>
<td></td>
<td>Mike Mortimore</td>
<td>Mr</td>
<td>Mortimore</td>
<td>504</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>The proposed delivery of 85 houses to the east of Burford (on Cole's Field) is within the Cotswold AONB and the Burford Conservation Area. It is important that these are respected. If we start building on green field sites within the AONB then it will be difficult to see where it would end. The view of Burford from the A361 heading South will be compromised. I have spent time looking at Burford from this road and it is clear that a patch of new housing in this particular location would not be in keeping with the town and surroundings and will stand out like a sore thumb. In addition, the road / infrastructure proposed I believe would be inadequate. Witney Street is already narrow with parking on both sides of the road. If additional cars are going to use it then it will become more dangerous. The road east, out of Burford, which is proposed to be a new gateway to Burford is also narrow and twisty. It is also used by ramblers who like to walk between Burford and Swinbrook. As there is no footpath along the entire length, this will mean pedestrians coming in close contact with more traffic than at present. This road is also prone to flooding. I am also concerned about other vehicular access to Burford / proposed site. Frethern Close is a narrow set of roads, as is Barn's Lane. Any proposed road from the A40 would disrupt the traffic on the A40 and could lead to a dangerous situation. I am not against expansion of the housing stock in Burford, I just feel that this is not the best option.</td>
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<td>MM290</td>
<td></td>
<td>Mardi Way</td>
<td>Mrs</td>
<td>Way</td>
<td>505</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I strongly object to any development on Cole Field for a number of reasons.</td>
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Fails to meet requirement of development being of "appropriate scale" - 85 homes when only 400 people live in Burford now is actually swamping the character and feel of the town. In combination with proposed Shilton Road development which has many of the same failings the town will be drastically scarred by these proposals.

No mention whatsoever of health provision being a requirement of any development in Burford area - already limited GP service sometimes requiring travel to Carterton, and I suspect that maternity and elderly care would also be particularly overstretched by new families and retirees. Existing GP surgery resource problem in Witney so unlikely to be funding available for enhanced capacity in Burford unless part of fully funded Local plan.

Plan says will work with OCC to mitigate HGV traffic in Burford - impact will be on more people if large development were to go ahead. There is zero evidence of such supposed co-operation producing any impact on HGV traffic in the 18 years I have been living here.

Fails to make any reference as to how building on sloping land where flooding already happens below the proposed site meets this requirement, with extra runoff and overflowing drains in the absence of major sewerage and drainage investment, neither of which is referenced as part of the proposed plan. Burford already suffers from insufficient drainage in the High Street so further flows into just the existing system will cause further damage and misery.

Merely adding up numbers and allocating them to sub areas to meet Government targets as a consequence of prior failure to seek out proper planning solutions in the WODC zone is not an appropriate basis to be called a Local Plan.
unsuitable for cars to use in large numbers. Money seems to be talking rather too loudly, accidents will happen and persons will be liable.

> 

> Flooding

> As mentioned above the risk of flooding along this valley to the north of the A40 is considerable not to just the road but also the houses to the north of Cole Field. After heavy downfalls my garden is flooded. The geology of the area is such that there are many springs along this scarp and without serious investment and agreed measures this will only get worse. Again money seems to be talking.

> 

> Views

> Burford is an old market town and it now depends on many visitors for its trade. People come here to spend money and are attracted by the beauty of the setting. To destroy a heritage landscape with the views across the river and is sinuous bow lakes would be a travesty and its impact would be more serious than money talkers can imagine.

Although I live in Sydney, Australia, I have spent a deal of time in the UK in general and the Cotswolds in particular. I am also aware that the Cotswolds Area, and in particular villages such as Burford, are the subject of mass tourism. People visiting the UK regard Burford and other villages in the Cotswolds as some of the most beautiful parts of Britain. No doubt that is why they are in the Cotswold Area of Outstanding Natural Beauty and the Burford Conservation Area. Burford is an historical town and includes, so I am informed, some 252 listed buildings.

It is in the context of the above that I learned that it is proposed to allocate in a draft local plan 85 new homes on a site to the east of Burford known as Cole’s Field. As a regular visitor from abroad to the Cotswolds and to Burford in particular, I respectfully record my objection to this proposal. Although there are, no doubt, many objections to the proposal on matters of detail, I confine my objection to the negative impact on the immediate environment such as the destruction of views across the Windrush Valley and the parish church from a number of approaches. I appreciate the desire to provide more land for housing in Oxfordshire[we have the same problem here] but not at the expense of one of England’s prime tourist areas which contributes so much to the local economy. This is an area of great beauty and must be preserved for future generations including visitors to your fair country. The building of 85 houses will detract unacceptably from the aesthetic and economic aspects of Burford and should be rejected.

We live in Swan Lane, just below Cole’s Field and would like to make the following comments regarding the draft local plan for 85 homes. We would first like to say that we are not opposed to more housing in Burford environs......as long as the plan has been properly thought through and everything fully considered.

* It is within the Area of Outstanding Natural Beauty and the Conservation Area. 2. There is no “gentle” slope onto Witney Street. 3. The water table on the land road side of the Windrush river is regularly very high causing flooding of the large area including the public footpath leading to Willford. 4. We would like to ask where the run off water will be directed, what drainage proposals are in place, are they viable? We have experienced a dwelling being built above us on Swan Lane in recent years (still not complete) where adequate water drainage has not been applied and now our garage with classic vehicles in it is constantly flooding! We are currently in correspondence with the planning department to TRY to sort this out - a long drawn out process whilst our cars rust.....This experience does not fill us with confidence re further building
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| MM299         |                        | Pamela Wilson   | -                | Wilson            | 514        | Burford-Charlbury sub area | works and there supervision.... 5. The Burford sewage system is not able to accept any more domestic sewage as is well documented. We call the Thames Water engineers out at least twice a year to sort out our inadequate shared sewer in Swan Lane. 6. The work prospects for future owner occupiers in the immediate area is extremely low as is obvious, therefore a journey into Witney/Oxford or beyond will be necessary along an already overloaded A40. 7. The public transport services from Burford are much reduced and not conducive with hours of work. Presumably an already clogged up A40 will be more unbearable to use to get to work. 8. However Charlbury has a good train service to Oxford/London but the proposed development there is for 40 houses not 85! 9. There is no proof of the necessity for a development of this size in Burford although there is need for a small amount of Affordable/Social housing for the families needing housing at a lower purchase price/lower rent. * There is provision for a 60 bed retirement home which is unnecessary in the area, with already adequate provision within the environment of Burford. 
We feel that the Local Plan desperately needs to take a long term view of the housing needs in the Witney/Oxford/Bicester areas where access to employment is more readily available via public transport/cycling etc...not long car journeys, otherwise we will be creating a massive problem in future years regarding the road systems which are already heavily overloaded. We live on Swan Lane and convenience parking on here makes emergency vehicle access very poor at times and cars park and block access to our garage....these small lanes are not meant for heavy traffic!
We are writing to you in anticipation of, maybe, our voices been heard. We also hope that adequate checks are made of any effects on local housing to prevent another situation like the one we find ourselves in with the house recently built on Swan Lane. |
| MM302         |                        | Paul Maguire    | Mr               | Maguire           | 523        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford | Burford-Charlbury sub area |
|               |                        |                 |                  |                   |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford | re: WODC’s Draft Local Plan which includes a proposal to build 85 houses on Coles Field, Burford. 
I wish to object to this proposal on the following grounds:
This is a designated Area of Outstanding Natural Beauty and within the Conservation Area which should continue to be protected, not eroded.
Burford already has tremendous problems with traffic flow and parking. On the basis that most households have two cars, this development could easily add another 160 cars to an already burgeoning problem.
The named access roads into the town, are already overcrowded with parked vehicles. Barns Lane and Swan Lane are single carriageway in parts. Witney Street is extremely busy with traffic constantly exceeding the speed limit. It also becomes a single carriageway in parts. None of the named access routes are suitable for increased traffic and could adversely affect highway safety.
The proposed development could have an adverse effect on the neighbourhood by way of noise and disturbance.
I hope you will take these points into consideration. |
|               |                        |                 |                  |                   |            | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford | We wish to object to the proposal for 85 new houses as per the draft local plan for the site known as Cole’s Field east of Burford. 
* It is an AONB and Burford a town unsuitable for “sustainable development” of a site this size. 
* It is a site at risk of flooding. |
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| MM303         |                         | Peter Brookhouse Richards | - | Richards | 524 | Charlbury Sub Area > MAIN 193 | I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field. My objection is on the following grounds:

* The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.

* It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton.

* There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB.

* The site slopes steeply to the north and there is a clear risk of flooding.

* There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars. 6. There is not enough capacity in Burford for primary/secondary school requirements. 7. The surgery will be overloaded, particularly as one of the surgeries in Witney is closing down. 8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%.

| MM28          |                         | Martin Cash | -mr | -cash | 53 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Comments refer to Burford proposals

Lack of consultation

destroying AONB and conservation area

creating huge traffic dangers on ancient roads with no footpaths

destroying medieval village/town infrastructure
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| MM308         |                         | Philip Bush    | Mr              | Bush              | 536        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | adding inappropriate environmental degradation - noise and air pollution
destroying visual amenity
lack of involvement of our local representatives in the town |
| MM322         |                         | Robert Simmons | -               | Simmons           | 591        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I am writing to object to the local plan land east of Burford known locally as Coles field.
Any development of this site would destroy the character of the local area. The proposed site sits in an area of outstanding natural beauty and would be clearly visible from many vantage points. The A40 approaching from Oxford, the A424 from Stow on the wold and the A361 from Chipping Norton.
Any development of this site would lead to severe traffic problems least of these being the added congestion in an already congested town. There is no clear access point to the site without building a new road. Barnes lane Pytts lane are totally unacceptable as this is a single-track road with few passing places it also has two blind crossroads. These two lanes are used by parents taking children to school as well as the elderly accessing Burford town centre. To access the site from Witney street would bring traffic out onto a blind bend and into an area that regularly floods as Witney street Hill view cuts through the natural flood plain.
Any development of this site would have a negative impact on the local environment it would greatly increase the risk of flooding in an area prone to flooding already. WODC carried out flood repair work to a car park it owns in Burford in 2013 and carried out some preventative flood alleviation work clearing two culverts and dredging part of the river Windrush next to the car park. By tarmacking and concreting over this field it would lead to considerable run off overwhelming the flood plain. The water is held in the field and allowed to seep naturally into the water table. Apart from the flooding it is an area used by a wide variety of local wild life. At dusk bats, can be seen hunting at the top end of the field they overspill into the back gardens on Frethern close as well as Barnes lane Pytts lane. Owls can be observed sitting on posts especially in the early morning. The proposed site now is very dark with no artificial light. Any development would greatly alter this natural environment affecting the local wild life. |
| MM326         |                         | Rosemary Pritchard | -           | Pritchard         | 598        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | West Oxfordshire draft local plan – policy no. BC1b – land east of Burford

As a frequent visitor to Burford I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field

My objection is on the following grounds:
* The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.
* It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton
* The site slopes steeply to the north and there is a clear risk of flooding
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| MM330        |                        | Sally N Squires | Ms               | Squires           | 609        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | * There is no suitable access as Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by legally parked cars.
5. The surgery be will be overloaded, particularly as one of the surgeries in Witney is closing down.
6. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 3 buses a day to Oxford. Adding 85 houses to Burford, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%.
I would like to make a strong complaint against the above proposal.
Beautiful, small, countryside towns such as Burford should have their environs kept for posterity as well as for the present population and its many visitors.
There is a toll already on facilities such as Doctors, School places and roads which would put a strain on both the new houses and Burfordians.
Traffic is bad on Burford High Street and there are long hold ups starting as far back as Fulbrook and up through our town to the A40 roundabout in rush hours. This puts a greater strain on Barns Lane, which is very steep and narrow in places and would be highly inappropriate for any further traffic.
There are times of the year when Witney Street, going out of Burford, floods, both from the hills above and from the river, again making access and egress difficult.
Present residents surrounding Cole's Field will have their views ruined, as well as the rest of us looking down over it and towards it from Stowe and the Chipping Norton Roads.
It seems to me very sad that such an important proposal is allowed to be reviewed over such a short time span, during the onset of Christmas, when all are extremely busy and lends a warningly furtive air to such an ill considered scheme.
With great hopes for a reconsideration.
 |
| MM333        |                        | Sarah Eggington | -                | Eggington         | 616        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | Re: West Oxfordshire draft local plan 2031 – policy no. BC1b (land east of Burford)
I am writing to object to the above policy in the draft local plan for 2031 for land east of Burford(Cole’s Field) to be allocated for 85 new homes. The grounds for my objection are detailed below:
1) Proposed vehicular access to the site:
I have safety concerns regarding the increased traffic that would be generated by any development on this side of Burford because of the A40/Whitehill junction. Whitehill leads in to Witney Street. When approaching this junction from the east the land falls away steeply and traffic coming up is hidden and cars repeatedly cut the corner. The immediate sharp angle of the road also makes it unsuitable for traffic approaching this junction from the west. For this reason this junction would be unsuitable and inappropriate as “A gateway to Burford”.
 |
Traffic leaving the proposed site to head North, South or West would travel westerly along Witney Street which is single track before it meets the A361. The alternative options are Barns Lane which in part is single track or Church Lane/Guildenford (three right angle bends) which is already busy (pedestrians and traffic) as it is leads to the only car park in Burford. Vehicles travelling from the West, South and North to the proposed site would also use these routes as they are significantly shorter options than the A40/Whitehill/Witney Street option and would lead to an increase in traffic in these areas.

There are frost signs as you enter Whitehill from the A40 and also as you leave the residential area of Burford heading east. The hill and parts of the road are north facing and there have regular accidents on this section of road in icy weather. I live on Witney Street and when the temperatures fall below zero I avoid this route. The proposed access point of the development is also in a northerly frost hollow.

Barns Lane is narrow, partly single track and has a sharp blind bend at the top so this would also be unsuitable as access to the site as would Wysdom Way/Frethren Close which is accessed via Barns Lane.

2) Safety concerns for pedestrians walking to Burford from the site.

Although there is pedestrian access to Burford Town via a footpath/cut through, pedestrians would use the shorter route via Barns Lane which would increase foot fall on the single track section of the road where there is no footpath. It would not be possible to add a footpath as there are high cotswold stone walls on either side. This route would be used by people accessing the town for shopping, the primary school, the surgery and St John the Baptist Church and would be used by adults and children alike. It would also be used by residents of the proposed care facility who may have mobility scooters. Barns Lane is also north facing and freezes during the winter months.

3) AONB and conservation area. A development of this size is unsuitable and not in keeping with the historic character of Burford and the appearance of its landscape. It is a pretty town and is defined by it’s photogenic quality, historic nature and views of its ancient buildings and the spire of St John the Baptist Church. The proposed development of this site would detrimentally affect the views from the north and east for visitors on foot, bicycle or car. The circular walk from Burford along the river windrush is greatly advertised and walked and the route is popular with cyclists. Tourism is crucial to the existence and sustainability of Burford.

4) Concerns relating to safety of pedestrians on Witney Street

The footpath along Witney Street is narrow and pedestrians including those with pushchairs are often seen walking in the road and make no attempt to step back on to the path. The additional traffic generated by this proposed site and the blind, narrow, windy nature of this section of Witney Street would magnify this problem.

I hope that West Oxfordshire District Council will withdraw policy BC1b from the local plan and instead investigate the possibility of more suitable sites to the west of Burford that fall outside the conservation area. The majority of the services (doctors, pharmacy, supermarket, library) are on the west side of the town which would improve the safety of pedestrians who would have no need to cross the busy A361 and reduce congestion from vehicles.
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| MM347        |                         | Steve Rothkopf  | -                | Rothkopf          | 648        | Charbury Sub Area > MAIN 193 | I wish to formally object to the proposals because:  
* The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character.  
* It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton  
* There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB  
* The site slopes steeply to the north and there is a clear risk of flooding  
* There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars. 6. There is not enough capacity in Burford for primary/secondary school requirements. 7. The surgery be will be overloaded, particularly as one of the surgeries in Witney is closing down. 8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, with 3 buses a day to Oxford. Adding 85 houses to Burford, with 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%. |
| MM348        |                         | Steve Turner    | Mr               | Turner            | 649        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I am writing to oppose the plan to build houses on Coles Field, an area between the A40 and Witney Street in Burford.  
Traffic on Witney Street is already impossible -- it’s easy to see why there have been so many accidents on this road -- this development will be responsible for intolerable congestion, many additional accidents and an inevitable number of injuries or deaths, both among speeding motorists and the walkers and cyclists brave enough to try to share what is a narrow country lane forced into becoming an A-road.  
And of course, for any vehicles which survive the journey, there’s already nowhere for them to park once they reach the town.  
West Oxfordshire DC has acknowledged that Burford parking is hopeless, as there has already been an unsuccessful initiative to manage it -- so it’s ludicrous to consider adding another 100 cars to the immediate area.  
To say the least, Burford’s infrastructure can’t support this development. Besides the traffic and the parking, there aren’t the school places for these additional families.  
And as for the flooding in the valley -- paving a large new estate within sight of a river is simply irresponsible - - even if the proposed development area doesn’t flood, the un-absorbed water will certainly be shipped downstream to flood the next village.  
Death, injury, flooding -- sounds like something from the Bible, doesn’t it?  
Please reject this badly-conceived plan. |
<p>|              |                         |                 |                  |                  |            | &gt; SECTION 9 - STRATEGY | Reference the fore mentioned proposed development I feel compelled to write and air my serious concerns. |</p>
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| MM351         |                         | Mrs S Haywood  | Mrs              | Haywood           | 655        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | They are as follows:-  
1) The proposal in particular the location of the old peoples accommodation fly in the face of your planning guidelines regarding the ‘overlooking and loss of privacy’. It also removes the amenities of the adjacent properties by removing any views they currently enjoy.  
2) The whole design brief, materials proposed and density of the plans is so far from being reasonable as to be willfully incongruous. The scale of the design is more in keeping with an inner city development and would not be out of place being called ‘Carbuncle Gardens’ Hardly fitting for an area of outstanding beauty. These houses are only needed because Oxford city is not able to fill its Quota because of its refusal to re designate its green belt line. Why because of their obstinance and intransigence should we as a community have to yield to such a poor design product?  
3) It is to my understanding incumbent upon planning departments to ensure developments are sustainable. No mention of a new primary school (the current one is full to bursting) no extra doctors surgery and primarily no employment for the proposed occupants ergo no sustainability!  
4) The community is in law reasonably allowed to expect planning departments to consider the public safety with regard to any plans put before you. Currently today the Barns lane would not pass muster and would be turned down on the grounds of no footpaths, effectively in several places where it narrows it is a single track road. Lorries and vans unloading currently hold up the traffic on a regular basis sometimes for considerable lengths of time. To condemn the current neighbours to an added 300 plus vehicle movements a day would be remiss in your duty of care and due diligence to all concerned. Any Layman can see the proposed traffic proposals are wholly inadequate and would not stand any scrutiny, allied to this Achilles Heel the complete disregard for the historic flood/water problems and you inspire in us nothing but contempt for your systems and processes....  
Please prove me wrong! |

Please consider this letter as my formal response to the consultation on the Proposed Modifications to the Submission Draft West Oxfordshire Local Plan 2031.  
My letter sets out significant concerns regarding an increased risk of flooding to existing community members, with expert advice supporting this, and also important traffic and pedestrian safety issues that would arise from a development on “Land East of Burford”. Further, I propose that the prescriptive inclusion of this site has not been subject to due process and is directly contradictory to a number of the stated vision, values and policies of the Draft Plan. I have not used the standard representation form as my response applies to the whole of section 9.6 (pp281-298 of the tracked changes document), with particular reference to all modifications applicable to developments in Burford – specifically MAIN 184 (para 9.6.25 – 9.6.47), MAIN 185 (para 9.6.31), MAIN 186 (para 9.6.32-9.6.34), MAIN 187 (para 9.6.34a), MAIN 191 (para 9.6.34j-9.6.34q), MAIN 192 (fig 9.17b), & MAIN 193 (fig BC1b), MAIN 200 (policy BC1).  
Comment on Submission Draft Modifications  
I believe the proposed modifications applicable to Burford (cited above), and in particular the inclusion of a named specific site (“Land East of Burford”) for the allocated housing in Burford, are not consistent with, and in cases are in direct conflict with, various values and policy statements in the WODC Local Plan. There has
also been insufficient regard/timely consultation with appropriate key agencies prior to the inclusion of definitive sites for development.

For these reasons, I do not believe the submission draft, including the cited proposed modifications, is sound, legally compliant nor meets the duty to co-operate as it stands.

Specific Concerns regarding the Inclusion of the Land East of Burford in the Draft Plan

The inclusion of a named site ("land east of Burford") in the draft plan for 85 allocated houses is deeply concerning both in

a) the implications of using this particular site (particularly with regard to increased flood risk to existing residents and pedestrian and traffic safety and other considerations), and

b) the process undertaken that has resulted in the removal of small scale, locally defined solutions and the imposition of a prescriptive site that potentially would extend to larger scale, inappropriate and unsustainable development.

I address these in turn below.

Implications of the Land East of Burford Site I – Increased Flood Risk to Other Residents

There are a number of stated relevant commitments which I believe to be in breach by inclusion of this site in the Draft Local Plan, including:

- Policy OS2 – Locating Development in the Right Places (MAIN 16, Policy OS2): - all development should...not have a harmful impact on the amenity of the existing occupants - not be at risk of flooding or likely to increase the risk of flooding elsewhere

- Various commitments in para 4.7, including: - reducing the current risk of flooding where possible and ensuring that new development does not increase that risk

- Inappropriate development will not be allocated or permitted in...reas at risk of surface water flooding or area with a history of groundwater flooding, or where it would increase flood risk elsewhere, unless there is over-riding need (that cannot be met in any other way), an absence of suitable alternatives and flood risk can be satisfactorily addressed (Para 8.50)

I should note that immediately following the publication of the draft local plan, a developer (Carterton Construction/Turley Associates, referred to below as "the developer") announced that they were intending to go ahead with development on the "Land east of Burford" site. Examination of their proposals has helped to provide further evidence to support my assertion that the site in question is unsuitable for development, as described below.

Over a dozen neighbours and I engaged a registered consultant hydrologist to assess the risk of the use of Coles Field (the site East of Burford, as defined in the draft Local Plan), with additional (but not sole) reference to the proposed site plans as presented by the developer (and available on their website) and presumvably in initial consultation with yourselves. The initial findings (full report available in the New Year)
suggest some significant risks to our property and road safety associated with surface and ground water considerations. I replicate these below for your information:

Potential flood risks of the proposed housing site

➢ The proposed housing site is on the hillside which continues above Orchard Rise.

➢ Orchard Rise has been built on land excavated into the hillside, immediately below the proposed housing site.

➢ In very wet weather water appears to arise within the rear garden in at least one location (12 Orchard Rise) within the excavated hillside and surface water collects against buildings at several other locations along Orchard Rise.

➢ It is clear that the houses in Orchard Rise are already vulnerable to flooding by soil and surface water coming from up the slope behind them.

➢ Orchard Rise could therefore be placed at further risk from surface water draining from the proposed housing site.

➢ Orchard Rise is particularly vulnerable to drainage of the proposed housing site by infiltration. Both national and local policy states infiltration to be the preferred method of drainage for new housing, and the current proposal is for drainage via infiltration swales.

➢ Water percolating into the soil immediately above the Orchard Rise excavation will be in the superficial deposits at the top of the excavated area. As both the soil and the superficial layers of underlying rock have been removed behind the houses in Orchard Rise this water will appear within the steep rear gardens and lead to further flooding of the existing property.

➢ A further concern is the provision of a safe route for exceedance flow - flow that results from rainfall in excess of that the drainage scheme is designed for. Such water can only move downhill, and the only downhill direction available is into the properties along Orchard Rise.*

➢ Witney Street runs along the foot of the hillside, below both Orchard Rise and the proposed housing area. There is already a flood problem along Witney Street, and the road can be dangerous due to surface water, exacerbated by freezing in winter.

➢ At the foot of the hillside, along Witney Street, are a number of active springs fed from water draining the hillside above. Some of these springs are used for water supply.

➢ The preferred access route into the proposed housing site is for a steep road down to Witney Street. Drainage of this access road has not been considered and there is no obvious route for its disposal.

➢ In addition, surface water from this road will introduce more water onto Witney Street, increasing both the volume of surface water on the road and the current flood and icing problems.

* I should also note that we are aware of further complications with the gradient of the site that means that not only does it slope down towards Orchard Rise, but also the proposed location of the swale(s) by the developer have additional gradients that result in a potential lowest point just behind my particular house.
exacerbating any issue and further complicating the construction of the swales to mitigate impact on my
property.

My neighbours on Orchard Rise, and also on Witney Street (erroneously referred to as Witney Road in the
Draft Local Plan) are understandably very concerned about these findings and I submit that the evidence
above means that the inclusion of this site in the Local Plan is contrary to your stated policies noted above
about flood risk and the inclusion of this site should therefore be removed from the Local Plan, and indeed
blocked from planning permission, on this basis.

Implications of the Land East of Burford Site II - Pedestrian & Traffic Safety and other relevant Considerations

I also submit that there are a number of traffic related relevant vision and value and policy commitments
which I believe to be in breach by inclusion of this site in the Draft Local Plan, including:

• “Reducing dependence upon travel by private car including long distance travel to urban centres” (see para
2.50 SWOT)

• Various commitments in para 4.7, including: - reducing the current reliance that is placed on the private car
for journeys into, within and beyond the District - reducing levels of out-commuting and increasing "self-
containment”

• Also Policy OS2 – Locating Development in the Right Places (MAIN 16, Policy OS2): - all development should
be proportionate and appropriate scale to its context -....not have a harmful impact on the amenity of the
existing occupants - be provided with safe vehicular access and safe and convenient pedestrian access to
supporting services and facilities - not be at risk of flooding or likely to increase the risk of flooding elsewhere

• Enable new development...of a scale and type in locations which will help improve the quality of life of local
communities and where the need to travel, particularly by car, can be minimized (MAIN 11, CO1); also “locate
new residential development where it will best help to meet housing needs (I note the removal of local from
this statement) and reduce the need to travel”(para 3.7 CO4)

At their recent presentation to local residents, on being challenged regarding the restricted access to Witney
Street from the north, south or west, the developer noted that their analysis had identified that the majority
of new homeowners would be working and therefore travelling towards Oxford. This seems to be echoed in
the draft local plan, which identifies “Witney Road” as the main access point to the site and contains no
reference to how it would be reached from other directions (see below). This appears not only contrary to
your key stated policies but also does not address the practicalities that residents, delivery vehicles and other
would need in practice to access via these routes.

I admit to being confused by the diagram included in the modified draft local plan under consultation, as it
includes some land known locally to be in some dispute. Notwithstanding this complication, at their
presentation on the proposed development on the suggested site of Coles Field (Land East of Burford), the
developer presented three alternative access points, one which would require access at a known local
accident “hotspot”, one at a location known locally to often be flooded by both surface water or river
overflow, and one via Barn’s Lane and Frethern Close, both of which are unsuitable due to restricted (single
width) access.

All of these access points raise safety concerns (I have also raised these concerns directly to Highways for
their attention); specifically:
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<td>➢Witney Street (erroneously referred to as Witney Road in the draft Local Plan) has extremely limited accessibility to the west. Thus any traffic from the development heading west, or accessing from the south (A361), west (A40) or north (A361), or indeed Burford town centre, or heading south, north or west (or into Burford town centre) would have to narrow roads with sections of single width and no pedestrian pavement. These roads additionally: - have limited passing places, some of which (such as the Swan Lane turn) invariably require cars to back into/sit on blind corners - are used by (unaccompanied) primary school children to walk to school - are used by elderly and disabled residents on mobility scooters - have dangerous access in their own right, most notably Barns Lane from the A40 roundabout whereby traffic does not anticipate access to/from Barns Lane and local residents are fearful of many experienced near misses (and actual &quot;prangs&quot;); further, cars turning into Swan Lane or Church Lane frequently have to back onto the High Street due to oncoming vehicles from those roads. - have parked cars that further narrow passage and which cannot be mitigated due to lack of off-road parking for many houses - currently experience significant issues with larger vehicles getting stuck/unable to access, including delivery lorries, removal vans etc. ➢Witney Street also has access issues for traffic going to/approaching from the east (A40 Oxford)* - access onto the A40 has a sharp angle, causing traffic to swing out and/or have limited visibility - is a known ice hazard (you have erected Ice Hazard signs) - is a locally known fog hazard - floods from surface water from fields above and overflow from the Windrush below - has two dangerous corners which are the site of several accidents (the walls along this stretch have been rebuilt in several locations, at a cost of over £15k to one resident alone in less than 6 years, such is the scale of accidents) - is subject to expensive tourist parking up the street, restricting visibility and further narrowing the road. ➢There is some confusion in the developer's proposals as to whether any access would be possible onto Witney Street, in which case alternative access is proposed via Barns Lane and Frethren Close (which exits onto Barns Lane anyway). The above points therefore continue to apply * It is locally well known and practiced that residents do not use Witney Street by choice in poor weather, instead using the High Street to access the A40. For WODC and the developer to be promoting Witney Street as a &quot;Gateway from the East&quot; to Burford, is being met with local incredulity and deep concern, for our own, and the new residents' safety. I suggest further that safe pedestrian access, and existing pedestrian safety, would be compromised by the use of this site. The increased pedestrian and traffic use of Swan Lane, Church Lane, and Barns Lane, all of which have no pavement, would by definition create a significant safety issue. Inappropriate Due Process Lastly, I am concerned about the process undertaken such that this one site is included, and others in the previous draft discarded. There has been little or no consultation about this site with some key agencies. For example that AONB have not been approached prior to inclusion of this site in the Plan, despite a stated commitment that “advice from the Cotswolds Conservation Board, including the Cotswolds AONB Management Plan...is invaluable.” And... “In accordance with national policy, major developments within the AONB will only be permitted in exceptional circumstances and where it can be demonstrated that they are in the public interest...In some instances even relatively small scale developments will be classed as major development... (paras 8.3 &amp; 8.4). It would seem more appropriate that AONB and the Town Council are</td>
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| MM352        |                         | Sue Riley      | Ms Riley          | 656               | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | involved in the identification and allocation of appropriate sites, enabling a cohesive sustainable strategy that utilizes local knowledge and is designed to meet local and Cotswold tourism and other community needs, without having a prescriptive site dictated in the Local Plan.  

I note the dropping of a commitment to restricting development in Burford to being “small scale” in the proposed modifications in the draft Local Plan under consultation, despite a commitment that “The distinctive qualities of the District’s other towns and villages will be protected” and “larger towns and villages will accommodate growth of an appropriate scale and type...without compromising their intrinsic character, appearance and setting” (Vision statement MAIN 9, Para 3.2).  

Given also your Policy on Locating Development in the Right Places “where development takes place can help to ensure housing and jobs are provided where they are most needed...help reduce car use, protect important areas such as AONB, conserve and enhance the natural and historic environment and avoid other sensitive areas such as those prone to natural flooding” (para 4.2) , the local employment rates and opportunities, and that even the developer acknowledges that he anticipates the majority of homeowners on the development “working in Oxford”, an argument for the location of anything more than small scale, sympathetic developments in Burford seems incongruous at best.  

Further, I understand that Highways have not yet even undertaken a site visit to assess the proposal (this is not scheduled until next week, after the consultation has ended). Given the stated difficulties and dangers noted above about this site, I hope you would agree that this makes the inclusion of this particular site as the only prescriptive solution in Burford in the Local Plan as inappropriate.  

I wish to strongly object to the inclusion in the draft local plan of the proposal to allocate land to the east of Burford, Cole's Field, for a potential development of 85 new houses.  

My key objections are traffic volume, traffic access, flooding and the impact on the area of natural beauty.  

Traffic Volume  

Traffic volume is already an issue in Burford within the existing road network. Increasing the population by 20% will substantially increase the volume of traffic on Burford’s roads, particularly as the lack of public transport will mean the new residents will have one or more cars per household.  

Traffic Access  

There is no suitable access to Cole's Field.  

Barns Lane and Frethern Close are very narrow and full of parked cars. Barns Lane and Swan Lane are single track in places, with no pavements. Increasing the traffic on these roads will ultimately cause traffic jams, minor accidents and could lead to injury to pedestrians.  

Witney Street is narrow, prone to flooding and icing. The proposals for access from Witney Street to the development are on a narrow bend. Drivers getting to Witney Street from the North, South and West will use the narrow roads in Burford, clogging up the road network.  

Flooding  

The site is claimed by WODC to have a "gentle slope". This is untrue and Cole’s field slopes steeply to the north. In periods of heavy rain water currently runs past our house, down Barns Lane. Cole's field absorbs the
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<td>MM356</td>
<td>Co-owner of Maple Barn Barns Lane Burford OX18 4NE</td>
<td>Bettina Halperin</td>
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<td>Halperin</td>
<td>660</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>I wish to object most strongly to the inclusion in the draft local plan of the proposal to develop Cole's Field, on the east side of Burford. While I recognize the pressure on the Council to make more housing land available, I feel I must challenge the flawed premise of the plan at this early stage. Overall, the plan appears guided by a desire to spread new housing development evenly across the region. This is a lazy and uninformed approach that fails to take into account the need to protect towns such as Burford, one of Oxfordshire’s and England’s greatest historical and tourist assets. As a co-owner of Maple Barn, Barns Lane, I know the town and the proposed development site very well indeed and object to planned development on the following specific grounds: Local impact * The West Oxfordshire plan proposes unrealistic and unsustainably large increases in the population of a historic small town. * A development of 85 homes would permanently bring 250+ new residents and 100+ new vehicles to Burford, a small town with a current population of approximately 1400. This is a proposed expansion of at least 18% to the population – this is a colossal figure and it is impossible to argue that any town would have the infrastructure to cope with such expansion, never mind a historic small town such as Burford. * The impact on traffic will be severe and outlined below, but many local services would also be insufficient for such an expansion (for example, the primary and secondary schools are already oversubscribed). The proposed development would create a tipping point of increased commercial services, community services, infrastructure and social need that will completely change the town’s character. Traffic volume * Traffic volume in Burford is already excessive for the existing roads and the West Oxfordshire plan would increase traffic to an unsupportable and dangerous extent. * Burford High Street is routinely gridlocked during morning and evening rush hours and weekends, and additionally when there is any local event that directs additional traffic along the A40, A424 or A361 (for example, the Cheltenham Festival, Cornbury Music Festival, the Feastival etc). This leads to dangerous, noisy and polluting knock-on congestion at the A40/A361 roundabout and the A40/B4020 junction. The overwhelming majority of new residents created by the proposed development will need to drive outside of Burford to their place of work and will own at least one vehicle, dramatically increasing traffic burden on the town.</td>
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Traffic access

* There is no suitable access to a proposed development of Cole's Field.
* Barns Lane, Swan Lane and Frethern Close are very narrow and choked by parked cars. Barns Lane and Swan Lane contain historic and protected buildings, and at points are single-track with no pavement either side, and with a sharp, blind turn at their intersection where there have been several minor (but likely unreported) accidents. Traffic volume and speed is already excessive for these small roads and further increases to traffic volume would be extremely hazardous.
* Witney Street is a narrow country lane prone to icing at the top and flooding at the bottom – the flooding is routine and has been significant during every year that I have owned a property in Burford, and would prevent access to any new development. This would inevitably lead future residents to access any development through other unsuitable routes (e.g. Barns Lane, Swan Lane and Frethern Close).

Flood risk

* Cole's field slopes steeply to the north and the risk of flooding is obvious. Indeed, as noted previously, Witney Street has flooded significantly during every year that I have owned a property in Burford.
* Given that the risk of flooding of Witney Street and the properties and roads to the north is currently mitigated by the absorptive capacity of the field, flooding of Witney Street and lower-lying land to the north would be almost inevitable given the loss of absorption and run-off that would be created by a development on Cole's Field.

AONB impact

* The proposed development goes against our generational responsibility to protect Oxfordshire's and the country's greatest historical and tourist assets.
* The proposed development would fundamentally and irrevocably change Burford, not least destroying the views across the Windrush Valley and the historic Parish Church from the A40 coming from Oxford, and the A424 coming from Stow.
* The proposed development site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is an historic town with 252 listed buildings and entirely unsuitable for a development of anywhere near the proposed size and character. It should be a fundamental premise that we should not degrade Burford Conservation area or any area of Outstanding Natural Beauty – it is everyone's responsibility to protect our most treasured heritage.

Lack of consultation

* There was no prior consultation with Burford Town Council, our District Councillor or the body that manages the AONB. Indeed, the original schedule for display of the development plans included exhibits at Chipping Norton, Carterton, Witney – but not Burford!

Overall, the current simplistic and unconsidered plan should be replaced by a proper planning strategy that targets developments in a way that has the minimum impact upon what are some of our county's most valuable assets.

I hope that you will consider these points and reconsider the proposed Burford development, and in so doing prevent irreversible damage being imposed on our most prized heritage. I look forward to your reply.
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<td>Ursula Mohan</td>
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<td>West Oxfordshire draft local plan – policy no. BC1b – land east of Burford</td>
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<td>relocate the John Radcliffe Infirmary from the City centre to Marston - so he knows a thing or two about town planning! Now resident in North Oxford and 96 years old, I know he would be heart broken to think that the beautiful village of Burford was being treated in such a cavalier fashion. As my husband has also pointed out, this is a classic example of ill thought out planning and I too want to add my voice in support of the local residents in their quest to persuade you think again and reject the current proposal. Specifically, my objection is to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field. My objection is made on the following grounds: * The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings and is entirely unsuitable for a development of this size and character. * It will destroy the views across the Windrush Valley and the parish church from the A40 coming from Oxford and the A424 coming from Stow and from the A361 from Charlbury and Shipton. * There has apparently been no prior consultation with Burford Town Council, the district councillor or the body which manages the AONB. * The site slopes steeply to the north and there is a clear risk of flooding * There is no suitable access. Witney Street is a narrow country lane which is prone to icing up at the top and flooding at the bottom and bends sharply at the proposed access point. Frethern Close and Barns Lane are also narrow and are choked by parked cars. 6. There is not enough capacity in Burford for the extra primary/secondary school requirements that would arise. 7. The surgery be will be overloaded, particularly as one of the surgeries in Witney is closing down. 8. The proposed revision of the original plan is as a result of the need for additional housing for Oxford City and also suggests 40 houses in Charlbury which has just under 3000 population, with 1298 households, and with a fast, efficient rail connection to Oxford. This proposal would increase the households in Charlbury by about 3% whereas Burford is a town of just over 1000 population, which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%.</td>
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<td>MM360</td>
<td>Victoria Halperin</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charbury Sub Area &gt; MAIN 193</td>
<td>Re: Objection to West Oxfordshire draft local plan 2031 – Policy no. BC1b – land on east side of Burford. I wish to object most strongly to the inclusion in the draft local plan of the proposal to develop Cole's Field, on the east side of Burford. While I recognize the pressure on the Council to make more housing land available, I feel I must challenge the flawed premise of the plan at this early stage. Overall, the plan appears guided by a desire to spread new housing development evenly across the region. This is a lazy and uninformed approach that fails to take into account the need to protect towns such as Burford, one of Oxfordshire’s and England’s greatest historical and tourist assets. As a co-owner of Maple Barn, Barns Lane, I know the town and the proposed development site very well indeed and object to planned development on the following specific grounds: Local impact * The West Oxfordshire plan proposes unrealistic and unsustainably large increases in the population of a historic small town. * A development of 85 homes would permanently bring 250+ new residents and 100+ new vehicles to Burford, a small town with a current population of approximately 1400. This is a proposed expansion of at least 18% to the population – this is a colossal figure and it is impossible to argue that any town would have the infrastructure to cope with such expansion, never mind a historic small town such as Burford. * The impact on traffic will be severe and outlined below, but many local services would also be insufficient for such an expansion (for example, the primary and secondary schools are already oversubscribed). The proposed development would create a tipping point of increased commercial services, community services, infrastructure and social need that will completely change the town’s character. Traffic volume * Traffic volume in Burford is already excessive for the existing roads and the West Oxfordshire plan would increase traffic to an unsustainable and dangerous extent. * Burford High Street is routinely gridlocked during morning and evening rush hours and weekends, and additionally when there is any local event that directs additional traffic along the A40, A424 or A361 (for example, the Cheltenham Festival, Cornbury Music Festival, the Featival etc). This leads to dangerous, noisy and polluting knock-on congestion at the A40/A361 roundabout and the A40/B4020 junction. The overwhelming majority of new residents created by the proposed development will need to drive outside of Burford to their place of work and will own at least one vehicle, dramatically increasing traffic burden on the town. Traffic access</td>
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| MM964         | BURFORD TOWN COUNCIL    | Burford Town Council | Mrs Andrews       | 722        | > SECTION 9 - STRATEGY AT THE BURFORD TOWN COUNCIL (the "Council") WODC's draft Local Plan 2031 (the "Plan") | * There is no suitable access to a proposed development of Cole's Field.  
* Barns Lane, Swan Lane and Frethern Close are very narrow and choked by parked cars. Barns Lane and Swan Lane contain historic and protected buildings, and at points are single-track with no pavement either side, and with a sharp, blind turn at their intersection where there have been several minor (but likely unreported) accidents. Traffic volume and speed is already excessive for these small roads and further increases to traffic volume would be extremely hazardous.  
* Witney Street is a narrow country lane prone to icing at the top and flooding at the bottom – the flooding is routine and has been significant during every year that I have lived in Burford, and would prevent access to any new development. This would inevitably lead future residents to access any development through other unsuitable routes (e.g. Barns Lane, Swan Lane and Frethern Close).  

Flood risk  
* Cole’s field slopes steeply to the north and the risk of flooding is obvious. Indeed, as noted previously, Witney Street has flooded significantly during every year that I have lived in Burford.  
* Given that the risk of flooding of Witney Street and the properties and roads to the north is currently mitigated by the absorptive capacity of the field, flooding of Witney Street and lower-lying land to the north would be almost inevitable given the loss of absorption and run-off that would be created by a development on Cole’s Field.  

AONB impact  
* The proposed development goes against our generational responsibility to protect Oxfordshire’s and the country’s greatest historical and tourist assets.  
* The proposed development would fundamentally and irrevocably change Burford, not least destroying the views across the Windrush Valley and the historic Parish Church from the A40 coming from Oxford, and the A424 coming from Stow.  
* The proposed development site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is an historic town with 252 listed buildings and entirely unsuitable for a development of anywhere near the proposed size and character. It should be a fundamental premise that we should not degrade Burford Conservation area or any area of Outstanding Natural Beauty – it is everyone’s responsibility to protect our most treasured heritage.  

Lack of consultation  
* There was no prior consultation with Burford Town Council, our District Councillor or the body that manages the AONB. Indeed, the original schedule for display of the development plans included exhibits at Chipping Norton, Carterton, Witney – but not Burford!  

Overall, the current simplistic and unconsidered plan should be replaced by a proper planning strategy that targets developments in a way that has the minimum impact upon what are some of our county’s most valuable assets.  

I hope that you will consider these points and reconsider the proposed Burford development, and in so doing prevent irreversible damage being imposed on our most prized heritage. I look forward to your reply. |
This is the Council’s response to WODC’s consultation on the Plan.

The Council is unanimously and strongly opposed to Policy BC1b which recommends that “around” 85 dwellings should be built on a site (the “Site”) on Burford’s Eastern boundary on the following grounds:

1. Such development would represent gross incursions into both the AONB and the Conservation Area. Such Areas are still afforded the highest degree of protection by the NPPF despite recent attempts to water it down. Burford has over 250 listed buildings and the Site constitutes an important part of the setting for those heritage buildings.

2. The Plan suggests access could be obtained from Witney Street (wrongly called Witney Road in the Plan), Barns Lane and Wysdom Way. Witney Street has two carriage ways, reduced to one by parking when entering Burford, two blind bends and is substantially below the level of the site. For a quarter of its length, Barns Lane is a single carriageway bounded on both sides by dry stone walls without passing places. The remainder is two carriageway reduced to one by parking – there is insufficient off street parking for the residents. Wysdom Way is a cul-de-sac also heavily parked. There is no suitable access for such a large scale development.

3. Paragraph 9.6.34j of the Plan states that the Site slopes “gently down towards” Witney Street. The gradient is 20/25%! Paragraph 9.6.34k states that the Site is not within a “designated area of flood risk”. That may be the case but it does not stop Witney Street flooding every year after heavy rain due to the absence of any drainage system under Witney Street, the run-off down the “gentle” slope and the natural springs in the area. A large scale development would exacerbate flooding due to the reduction in the amount of farm land acting as a natural soakaway. Furthermore, Orchard Rise on the Northern boundary of the Site, and its houses are below the level of the Site and would take the full force of the flooding.

4. Burford has no industry, very few offices and a little agriculture. It lives and thrives on visitor income i.e. tourism which generates about £15 million per annum for the benefit of the Town, the District and the County. Large scale development of the Site will be a serious disincentive to tourists, specially first time visitors, as they will lose the wonderful views over the Windrush Valley, framing the famous Parish Church of St. John the Baptist, from the A40 approaching from the East and the A361 and A424 approaching from Chipping Norton and Stow-on-the-Wold respectively.

5. 85 homes on the site would increase the density of dwellings on the area comprising the Site and the Frethern Close estate by more than 70%. This is excessive for a rural community.

For the above reasons, the Council requests that Policy BC1b be withdrawn from the Plan.

The Council had no knowledge of Policy BC1b prior to the issue of the Plan to the public for consultation. It was the original bolt from the blue. If the proposal had been discussed with the Council some of the more egregious errors in the Plan would have been avoided. The failure by WODC to engage in pre-publication consultation would appear to be a clear breach of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

My objection to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford known as Cole’s Field

My objection is on the following grounds:
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| MM383         | Charbury Sub Area > MAIN 193 | Madeline and Michael Baggaley | - | Baggaley | 825 | We wish to put forward our objections to the proposed plan for the building of 85 new homes on the site in Burford known as Coles Field. Our objections are on the following grounds:  
1) Burford is in an area of Outstanding Natural Beauty (AONB) and the impact of this quantity of building would have a drastic impact on the appearance and character of this historic town.  
2) The effect of the extra traffic this development would entail - the Barns Lane area is very narrow with limited footpaths and already under pressure on busy days with local traffic going from the A40 roundabout down the High Street to cross the bridge - that is when you eventually get to the roundabout with the queues along A40/A361. The other option of Witney Street - also narrowed High Street end with parked cars and the |
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| MM386        | Cotswolds Conservation Board | Ms Rood 837 | Cotswolds Conservation Board | Rood | 837 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | A40/White Hill junction is very prone to ice in the winter, and the speed some traffic users, I have seen numerous accidents over the years. The exit/entrance is along the road area called Springfield that is so called because of the natural springs that run down from your proposed site to the river, the road being inclined to flood.
3) The impact of this quantity of housing/traffic/people on existing schools and doctors surgery that are already filled to capacity.
This is from a 72 year-old resident who has lived here all of her life, please don't ruin this delightful old town - already under pressure from too many heavy lorries and traffic quantity. |
| MM387        | Angela Tancock 839 | Mrs Tancock | Angela Tancock | Tancock | 839 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I am writing concerning the policy of BC1b - land east of Burford. I strongly object to the draft local plan with regard to the proposal of use of Cole's Field. The abhorrent thought of 85 houses being built on the site is sickening.
Firstly, but not overwhelmingly, the site is within the Cotswold Area of Outstanding Natural Beauty. Just think what this means, planners; - could not a brown site be found somewhere instead of spoiling this obvious jewel of a site for the Cotswolds?
Secondly, it is within the Burford Conservation Area. The meaning of 'CONSERVE,' quoting from the Oxford English Dictionary, means "KEEP FROM DECAY, OR CHANGE, OR DESTRUCTION." Burford brings in thousands of visitors from home and abroad; they come because the area has been preserved by our fore-fathers and is a small town bursting with listed buildings, a great many less than a kilometer from the proposed building site. Examples of historic houses are: Wisdom House (Grade II listed building), The Highway Hotel (Grade II listed building), St. John the Baptist Church, begun 1175, and The Great House, built in about 1690. All these buildings are less than 1 kilometer from the proposed site. I came to your Carterton construction plans on Tuesday evening and part of the writing stated "will respect the qualities and character of the AONB." This is a total contradiction in terms . If anyone builds on this site by the very nature they "will" NOT "respect the qualities and character of the AONB." In conclusion to this particular paragraph this field is entirely UNSUITABLE for a development such as this.
Has anyone from the planning committee ever walked down Witney Street, Barns Lane or Frethem Close, NO NOT on a Monday morning when everybody is at work? But in the evening, or a weekend? You will find that all three areas are crammed with cars (on some properties there are no garages or parking spaces on the actual properties themselves). Certainly Barns Lane and Frethem Close are ONE-WAY cars only. You cannot get two cars alone Barns Lane - absolutely not, and Frethem Close is the same when cars are parked along the edge of the street. In Witney Street you cannot turn into it from the High Street. Just how are cars going to access the further end of this street? Again planners, walk along the circuitous route which cars would have to take. These streets are medieval - narrow. You cannot expand ring roads which have stone buildings |
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<tr>
<td>MM391</td>
<td></td>
<td>Jane Turnwell-Westmaid</td>
<td>Ms</td>
<td>Turnwell-Westmaid</td>
<td>845</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
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<td>MM392</td>
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<td>Kevin Joy</td>
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<td>Joy</td>
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| MM393         | E R Dobson              | Dobson         | -                | Dobson            | 854        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I wish to endorse and support Burford Town Council’s objection to the erection of 85 houses on Cole’s Field, a copy of which you will have!

1) Witney Street is a “rat-run” with all the compass points onto the A40. I have lived and worked here since 1960.

2) Access point of White Hill, with its entrance and exit points on to the blind bends of Witney Street is astounding. Access point of Barnes Lane is unsustainable: narrow, steep, one-way section, parked vehicles with little widening capabilities.

3) Witney Street floods from heavy rain (increasingly) ’run off’ from Cole’s Field with its natural springs.

4) Parked vehicles on Witney Street impede movement; additional traffic movements....? A neighbour’s parked, stationary car was written off.

5) Is there a conflict of interest with Cotsway’s second and third social housing? How many dwellings will there be for first-time buyers, and, will the rents be affordable?

6) Burford is grid-locked daily; strangled from seasonal events, accidents, holiday traffic, in every compass point Witney Street becomes the A40 from those mentioned aspects.

7) Sewage: current system does not function properly...

8) Extra light pollution

9) Schools, capacity...?

10) Doctor’s surgery...?

11) Burial ground...?
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| MM394         |                         | C R Dadge       | Mr              | Dadge            | 855| > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site east of Burford, known as Cole’s Field. My objection is on the following grounds:  
1) This site is within the Cotswold Area of Outstanding Beauty and the Burford Conservation Area. Burford is a historical medieval/Saxon town with 252 listed buildings and is entirely unsuitable for a development of this size and character.  
2) It will also destroy the views across the Windrush Valley (a view I add has been there for many hundreds of years) from the A40 coming from Oxford and the A424 coming from Stow.  
3) There was also no prior consultation with Burford Town Council, our District Councillor or the body which manages the AONB.  
4) The site slopes steeply to the north and there is a clear risk of flooding, e.g. last year, 2016, a car park was shut for many weeks, and in 2007 the flooding was horrendous. These are just two examples.  
5) There is no suitable access: Witney St is a narrow country lane prone to icing up and flooding at the bottom, and bends sharply at the proposed access point (obviously nobody has been to see this this year). Frethern Close and Barns Lane (an area I know so well) are very narrow and always choked up with parked cars. It has also become a rat run because of the influx of new people in the new developments on Frethern Close (it is an accident waiting to happen). |
| MM396         | Mr Michael Taubenheim   | Mr              | Taubenheim      | 859             | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I find the sight totally impractical for so many houses. Talking to the developers at their 'open' meeting in the Warwick Hall last Tuesday they said 85 houses and 60 flats...  
The town of Burford is choked with traffic as it is, so another 145 dwellings will mean another 200 plus cars and service vehicles each day.  
Also the town's infrastructure would not really take the strain (sewage/waste, water etc.)  
Also the W.O.D area is an added interest for visitors, with an income calculated by WODC as £15,000,000 per year from tourism. The visitors would be greatly 'put-off' if the town was choked by extra traffic.  
I really believe Burford's infrastructure cannot take the strain of this development at that location. |
| MM41          | Ashford                 | Mrs             | Twelves         | 86              | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I object most strongly to your planned development in Burford. Why spoil a lovely village which is so famous for being unspoilt. Big mistake, I am sure there are other ways round this and other places to build. Yours sincerely K Twelves. |
| MM118         | Neil Treloar            | Mr              | Treloar         | 872             | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford | I am writing to you to express my upset over the planned development of 85 new homes near Frethern Close Burford. My house overlooks the proposed site. I have seen the proposed plans showing where the houses are likely to be built. These houses will ruin my view of the Windrush Valley. I am in the process of buying this house, my home for nearly 41 years, my entire life. |
Charlbury Sub Area > MAIN 193

My mother who owns the house currently moved away after the death of my father left her with memories of this house she found too upsetting to be able to continue living here.

I had the property valued. One main factor in making this property desirable was the outstanding views quoted as being "Ex-local authority located on the outskirts of Burford, in a popular location with far-reaching views from the rear over open countryside."

Well, the plans will certainly ruin that if allowed to go ahead. I see no need for the houses to be built in full view from all directions around the entire perimeter, when the houses could go towards the bottom of the steep valley, closer to the shops, away from the houses on Frethern Close, who’s residents have already suffered greatly since the two most recent developments on the estate, most recently of the new Falkland Close development.

I suspect there is an underhand reason for the houses being proposed all around the perimeter, not admitted by Carterton Construction Ltd, and most specifically by director Harry Watts. They boast of new exciting green areas within the development site. I think they plan to get straight in and build around the edge with a view to then infill with more houses.

Burford can’t cope with so many properties being built. The high street is so busy, many commuters having already taken to rat-running down the single track Barns Lane, as the High Street is often gridlocked. And in an attempt to avoid the also gridlocked A40/A361 roundabout, people coming along to A40 eastbound, take the short-cut down White Hill, into Witney Street, passing the North entry/exit to the proposed new site. Traffic in Frethern Close has now reached an unsafe level since the addition of the new homes on Falkland Close, not simply due only to the amount of new residents, but also their frequent visitors, many of whom seem to be unable to drive at a safe speed. With the amount of parked cars, it seems only a matter of time before somebody is run over and seriously hurt. Any traffic calming measures would be hard to implement, they often involve single-file traffic areas and speed humps, which would take away the availability of much-needed and scarcely available parking spaces on Frethern Close.

Since the new houses were built, we have seen an immediate increase in the following areas:

- dog fouling
- litter, most notably disregarded kebab packaging and drinks cans and crisp packets/sweet wrappers
- brawling, resulting in police action

I don’t relish seeing all this again to the rear of my property.

Other liberties I see under threat would be my access to the rear of my property, as I and many other residents have always enjoyed unquestioned access to Cole’s Field. I actually have permission to use the field for pigeon shooting any time there are no crops planted, so I would loose, not gain, green space, and my dog would loose her freedom to walk around the edge of the field.

I wonder if anybody has asked Burford County Primary School, could they cater for any more children? If the answer is no, we would see an increase in traffic for the daily school run, on already congested roads. I am not aware either if any environmental impact on the wildlife has been explored. There are frogs, newts, foxes and dear who are regular inhabitants of the field. I am sure they too will suffer.
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| MM401         |                         | John Middleton  | -                | Middleton         | 884        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I understand the need for new homes, but why do people constantly insist in dividing communities. Surely a whole new town could be built, for example on the land around Bradwell Grove/Shilton, where the solar farm is an old Airfield site, not much use for farming, with no impact on an established town in a Conservation Area. 

P.S. Is the sewage works able to cope with the increased capacity? |
| MM44          |                         | C J Rushton     | Mr and Mrs       | Rushton           | 89         | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | We cannot believe the news that there is a proposal to do develop Cole’s Field. Burford is basically an overgrown village and any large-scale development will spoil the charm and ruin the unique feeling of a close-knit community: 

1) The site is not a gentle slope and is very steep at the Witney Street end. 

2) Because of the slope, storm water will be a major headache and must not be allowed into stormwater drains in Witney Street...it would cause major flooding (also sewage). 

3) It would be an eyesore from A36 and footpaths around Swinbrook and Widford. 

4) Access to the proposal is totally inadequate - Barns Lane already busy and too narrow for additional traffic - Witney Street connection to existing bend from a very steep road is madness. It is a north facing slope towards Witney street which is bound to get icy in the winter, making this entry/exit point extremely hazardous. 

5) Witney Street as a fareway to Burford is a joke. It is effectively single track from the fire station to the white railings on the outskirts. 

6) There are very few jobs available with Burford, so surely extra housing should go closer to industry and not force more people to commute on the already overloaded local roads. 

There are so many examples of sprawling development of towns in the vicinity, e.g. Brackley, where the road structure is awful; because of piecemeal overdevelopment; don't let lovely Burford go the same way please. |
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| MM408         | Mr R Horsley    | Mr Horsley       | 899        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | "Cole's Field is rich in wildlife and provides a valuable habitat for a number of farmland specialist birds. These include partridge, turtle doves and tree sparrows, which we regularly see in the field, and which are known to be in severe national decline. Destroying the habitat would not only affect these species, but would also have consequences for other animals including hedgehogs, foxes and adders, all of which we have seen in the field.

"Cole's Field, and its access through Barnes Lane, is used as a right of way and should be recorded as such under section 31 of the Highways Act 1980. People use the Barnes Lane entrance and the edge of the field to access the rear of the properties in Barnes Lane, Frethern Close and Wysdom Way, they walk along this route with their families and they walk their dogs. I have memories of using this route as a child in the 1970s and it is still regularly used today.

"The site access proposals are not acceptable and would lead to potential safety hazards. Witney Street is a narrow country Lane which already suffers from congestion and speeding vehicles. It frequently floods and freezes during winter. A development of 85 new homes would bring at least double that number of cars, plus there would be more cars working at and visiting the proposed care facility. The town simply cannot cope with this level of traffic; it would create road safely problems and cause difficulties for the emergency services.

The draft plan says that primary vehicular access would be through Witney Street. Witney Street is a narrow country lane which already suffers from congestion and speeding vehicles. The main entrance to the proposed site would be right next to the double bend which is particularly hazardous. The road frequently floods and freezes during winter.

The plan goes on to state that secondary vehicular access may be achieved from Frethern Close/Wysdom Way to the south and Barns Lane to the East, both of these options are entirely unsuitable. The roads are already full of parked cars; Frethern Close in particular is extremely difficult to negotiate in a car if there is another vehicle travelling in the opposite direction. This already causes difficulties for emergency services, refuse lorries and delivery vans. Barns Lane also has its own traffic issues. There have been a number of occasions recently where lorries have become stuck, occasionally causing damage to walls. This highlights the unsuitability of this road as an access point.

Extra traffic through any of these routes is not acceptable. A development of 85 new homes would bring at least double that number of cars, plus more cars working at and visiting the proposed care facility. The town simply cannot cope with this level of traffic; it would create road safely problems and cause difficulties for the emergency services.

We have already written about the proposal but would like to add further points.

1) Although we appreciate that WODC have to find sites for additional houses - we question that 85 houses in Cole's Field Burford is the right move. Burford is a small town of 1500 people and 85 houses and their cars will make a huge difference. The narrow steep roads of Barns Lane, Pytt Lane, Guildenford and Witney Street are all heavily congested with traffic and parked cars - and the A361 (The Hill) is always busy, and often at a stand still. We note that Charlbury, with 3000 residents, has planning for only 40 house. Charlbury has a mainline station to London, while Burford has very poor transport links.

2) We also note that there has been no consultation with Burford Council, the Cotswold Conservation Board or Historic England. If Burford has to have more houses there are more suitable sites, for example, flat ground in Tanners Lane which comes out straight onto the A40, and has the advantage of being on the same side of the A361 as the primary school, the pre-school, the doctor's surgery, chemist, and supermarket. There is also land available opposite the Garden Centre on Shilton Road, which also has the advantage of being a..."
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| MM409         |                         | Judith Horsley     | Mrs Horsley      | Horsley           | 901        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | We would like to object to the proposed development of 85 houses east of Burford in Coles Field. 
3) The Cotswolds are well known worldwide, and their beauty deserves to be preserved for future generations. In conclusion we would strongly urge WODC to withdraw policy BC16 from the local plan, as it does not comply with EH7. |
|               |                         |                    |                  |                   |            |                     |                     |
| MM410         | S & J Jenkins           | Mr and Mrs Jenkins | Jenkins          |                   | 903        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | We all know that Burford is considered to be the Gateway to the Cotswolds and is famous for this. 
What residents and visitors are also aware of is the level of traffic that uses 'The Hill' and the number of side streets that are used for parking. It is not uncommon to see a queue of traffic stretching from the bridge back up to the A40. 
The scale and position of the proposed 85 houses will further impact the narrow side streets unsuited to cope with this level of development let alone the lorries etc. needed for the building works. 
As for the 'gentle' slope down to Witney Street, clearly someone needs to survey the area as it is far from gentle and not surprisingly does flood from time to time. 
I can only assume that the proposal was submitted without due care for the surroundings and impact on the town, its residents, visitors and character. |
|               |                         |                    |                  |                   |            |                     |                     |
| MM423         | Brad Allan              | Mr Allan           | Allan            |                   | 937        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > Planning application for 85 houses on Cole's Field Local Plan 2031 - Burford-Charlbury Segment | I am writing to lodge my objection to the development stated above. Baring the obvious spoiling of the medieval village by surrounding it with 21st century housing there are various further points I would like to make. 

Firstly, access. I regularly walk up or down Barns Lane and there is hardly enough room for a pedestrian and a |
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<td>MM426</td>
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<td>Mrs. D. J. Skinner</td>
<td>Mrs Skinner</td>
<td>952</td>
<td>MAIN 193</td>
<td>car, never mind two cars, so access from here would be impossible. Witney Street is extremely dangerous due to sharp bends, so giving limited vision, so access from here would be very dangerous. Secondly, with close proximity to Oxford, Burford is one of the Cotswold’s most visited villages. When arriving along the A40 the first view would be of the new houses, what a shame! The first view now is when one goes down The Hill and it is breath-taking! Thirdly, the famous BRIDGE. I already worry about the traffic and trucks that go over the bridge, which at some stage will just collapse. 85 more houses would exacerbate this problem. Finally, with no survey being carried out will local services, doctors, schools, fire station etc. be able to cope? I am sure not! I understand their is a massive demand for housing across the whole UK. BUT cannot in anyway justify that to build in Burford makes any sense besides probably higher profit for the developer!</td>
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<td>MM424</td>
<td>Natural England</td>
<td>Mr Turner</td>
<td></td>
<td>954</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193</td>
<td>- Access to the site is totally unsuitable. Witney Street bends sharply at the proposed access point, is a very narrow country lane, and is prone to ice in winter at the top and flooding at the bottom. Also, as is the case with Frethern Close and Barns Lane, Witney Street is very congested with parked cars, making it so narrow, allowing only one-way traffic in places. - There was no prior consultation Burford Town Council, our district councillor or the body which manages AONB. - Burford is a beautiful historic town with many listed buildings and, as such, is a magnet for tourists. A development of this size and character is totally unsuitable. Furthermore, the views across the Windrush Valley and the Parish Church, coming from Stow on the Wold on the A424 and coming from Oxford on the A40, will be destroyed. This, together with the increased congestion caused by the extra cars which will result from the 85 new homes, will be detrimental to tourism which is vital for the majority of businesses in Burford. - This type of development is not appropriate within the Cotswold Area of Outstanding Natural Beauty and the Burford Conservation Area.</td>
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<tr>
<td>MM427</td>
<td>Julia St-Rees</td>
<td>Ms St-Rees</td>
<td></td>
<td>960</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury</td>
<td>Allocations in the Burford/Charlbury Sub Area (Land North of Woodstock Road Stonesfield, Land East of Burford, North of Jefferson Place Charlbury and South of Milton Road Shipston Under Wychwood). All these sites fall within the Cotswolds AONB. For all four sites the Sustainability Appraisal states that there has been no landscape assessment and a major negative long term effect is anticipated. A landscape assessment needs to be undertaken to inform the selection of site allocations before these sites can be considered for inclusion in the Local Plan. Please may I register my protest against the plans for 85 houses to be built on Cole’s Field, Burford. In agreement with other residents, I am astonished that such an idea has been proposed, especially given the unsuitability of the land for expansion and the detrimental effect it would have on the existing houses in Burford. 1) No proper survey can have been carried out.</td>
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| MM430 | | Janet Roberts | Mrs Roberts | 975 | Sub Area > MAIN 193 | 2) Burford houses suffer from inadequate/poor drainage as it is, resulting in what is known as "The Burford Stink."
3) The land on the proposal site is steep and will cause further misery and flooding.
4) Drain's cannot cope.
5) There is no suitable access - Barns Lane is already impossible at times, Witney Street is unsuitable and often blocked.
6) I understand there was no prior consultation with Burford Town Council. Is this not lack of 'good practice'? 
7) This is an area of Outstanding Natural Beauty.
8) I believe affordable housing is very necessary in West Oxfordshire. Surely it would make more sense for each village to have a few new houses built rather than 85 all in one place?
To sum up, I am totally against such an inappropriate development - it would be an expensive mistake for West Oxfordshire, for the current home holders and businesses in Burford, for the council and for the taxpayers. |
| MM431 | | J S Agnew | Mrs Agnew | 976 | Sub Area > MAIN 193 | Proposal to build on Cole Field (Local Plan 2031)
I want to register my objection to the above:
1) Witney Street floods every winter, sometimes between the college and White Hill. It is choked by traffic.
2) Barnes Lane could not be used as access, since it is one way. In winter this road cannot be de-iced.
3) I object because the new development could not be accommodated in the present sewage system without disruption to existing facilities.
4) The Burford sewage system is antiquated and inadequate. Last month (November) Church Lane was closed for 3 weeks for repair to the system. |
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| MM433         |                         | E. Auu Kenny    | Ms               | Kenny             | 978        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I should like to make a comment about the possible development of land in Burford between Orchard Rise and Frethern Close. Access and egress from that sight is going to be a nightmare. If the entrance and egress is on the west side where the slope of the land on a map or diagram looks as though it might be easy, it is not. It leads into a narrow lane, at the bottom of which is a very old cottage. That road is really old. For pedestrians it might be suitable but most vehicles find it very narrow and steep.
I am not making any comment on the north side of the development. I am not clear what has been proposed. |
| MM434         |                         | L. A. Bradshaw  | Mr               | Bradshaw          | 979        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 193 | I am deeply concerned at the inclusion in the draft local plan of the proposal to allocate 85 new homes to the site to the east of Burford, known as Cole's Field. Accordingly, I wish to object for the reasons stated below:
1) Access to the site is very difficult. Witney Street, Barnes Lane and Frethern Close are all narrow, choked by parked cars and, in the case of the first two, are prone to icing in winter. Witney Street access is particularly difficult as it is on a sharp bend and the site slopes steeply in the north, contrary to the 'gentle slope' quoted. Furthermore, Witney Street already suffers from regular floods from rains after pouring down from the fields.
2) Congestion in Witney Street in particular, is already very bad. It is effectively a one-way street, within the Burford limits, because of parked cars. The access onto the High Street is single car width and there is often a multiple car queue. As yet the impact from the new Warwick Hall, adjacent to the church, has not yet been fully felt. When major events are held, this will lead to further serious congestion as Church Lane feeds into Witney Street. The result of extra cars from the 85 new homes in Cole's Field would exacerbate an already very congested street.
3) Prior consultation with the Burford Town Council, our district councillor, or the body which manages the Area of Outstanding Natural Beauty does not seem to have taken place - surely a serious omission?
4) Burford is a very beautiful, historic town with many listed buildings and is totally unsuitable for development of this size and character. Cole's Field lies within the Cotswold AONB and the Burford Conservation Area. There is no doubt in my mind that the proposal in question of 85 new homes which would result in a population increase of an estimated 195 people (based on Carterton Construction's figure of an average of 2.3 people per house) is not practical or realistic. I do not believe that the existing infrastructure of the town can cope with this influx, including an additional estimated number of cars in excess of 100.
5) Tourism and the economy of Burford are strangely excluded. Indeed the tourist trade is vital to the vast majority of Burford businesses, and anything which impacts negatively on tourism would be bad for Burford. If congestion on the Burford streets becomes worse and the beauty of the town is affected, this will affect Burford adversely. The proposal of 85 new homes on Cole’s Field would destroy the views across the Windrush Valley and the Parish Church when approaching Burford from the A424 from Stow-on-the-Wold and on the A40 from Oxford. |
<p>| MM436         |                         | I R W Moore     | -                | Moore             | 981        | &gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 193 | It is a very good idea for local people, the only worry I have is whether there will be affordable homes, not the silly house prices we have in Burford! As the A40 is a very busy road, so the local roads would have to be changed for an exit on to the A40. |
| MM425         | Carterton Construction  | Carterton       | -                | Carterton         | 992        | &gt; SECTION 9 - Principle of the Allocation | |</p>
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**2.56** Land east of Burford is proposed for allocation for “around 85 dwellings as a well-integrated and logical extension of the existing built form of the town.” As discussed above in respect of main modifications 15-16, Burford is classified by the Council as a rural service centre, the second tier of settlements in the District after the three main service centres.

**2.57** Within the Burford-Charlbury Sub-Area there are no main service centres, and Burford represents one of only two rural service centres in the Sub-Area, serving the wider villages and sub area. The Plan recognises that rural service centres are sustainable locations to accommodate development.

**2.58** Paragraph 9.6.4 of the Plan highlights that there have been no sites allocated for residential development in Burford since the late 1980s, although it is acknowledged that some limited windfall development has occurred over this period. The Plan highlights that this, together with the desirability of Burford as a location to live, has significantly increased house prices in the town.

**2.59** We support the proposed allocation of the site which will help in addressing the lack of recent supply of new housing in the locality over the Plan period through the delivery of much needed housing.

**2.60** Clearly given the site’s location in the AONB, due consideration must be given to the tests set out in the NPPF in this regard. The Council have clearly set out their justification in relation to the tests in proposing to allocate the site. We consider each of the tests in turn below and provide our own assessment against which supports the conclusion ultimately reached by WODC in proposing the allocation.

**2.61** As has been clearly established the Council has a high level of housing need and there is a need for the Council to also seek to accommodate a proportion of the unmet needs of Oxford City. We do not repeat these considerations here but clearly regard should be had to this level.

**2.62** Burford is classified as a rural service centre, the second tier of settlements in the District and is ranked as the 6th most sustainable settlement in the Council’s Settlement Sustainability Report. Significant allocations are proposed at the Council’s three main service centres, and the Proposed Modifications to the Plan have sought to enhance the capacity of these locations where possible. Given the scale of development necessary to be met in the District it is plainly impossible for the full quantum of development to be met at the main service centres and this is reflected in the proposed allocations at the rural service centres and indeed other settlements further down the settlement hierarchy.

**2.63** The Local Plan highlights that no allocations have been made at Burford since the late 1980s. A limited number of dwellings have been delivered through windfall development in Burford Parish however as shown by the material at Appendix One this totals only 79 new dwellings over the period 2001 to 2016. Of the total completions in Burford Parish
only 28 affordable homes have been completed. As of 1st April 2016 there were 1,443 people on the Council’s Housing Register and of these 28 applications have registered Burford as their first choice of area.

2.64 Clearly therefore there is a level of need for both market and affordable housing at both a District and Parish level which necessitates the allocation of the site within the AONB. Paragraph 9.2.26 of the Plan highlights that: “the Town Council is keen to see an increase in the housing stock to provide some affordable housing to enable younger families to live in the town, secure the future of the primary school and increase the supply of key workers.”

2.65 The Plan also highlights that the development would have a beneficial effect in terms of the local economy during the construction phase. In addition we would highlight the beneficial effect the proposals would have once occupied through the support of local services and facilities. The development is well located to provide access to the services and facilities on offer within the town and the proposals will seek to link into the existing connections. Whilst Burford does benefit from a good range of services and facilities, these are somewhat reliant on the tourist trade which the town attracts, and the proposed development will help to supplement this income through the increase in resident population.

2.66 As such it is considered that the proposed allocation clearly meets this criterion. The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way

2.67 As discussed above the need for development to be accommodated at Burford has been clearly demonstrated. In considering potential locations for development around Burford the draft Plan highlights that:

“In terms of the scope for developing elsewhere or meeting the need in another way, the majority of Burford (except land south of the A40) is washed over by the Cotswolds AONB designation. Any development within or on the edge of the town will therefore fall within the AONB and the scope for avoiding it does not exist other than south of the A40 where the Council’s assessment of land availability has been unable to find any suitable sites.”

2.68 The Plan below (ATTACHED) is taken from the SHLAA (June 2014) and clearly demonstrates that the majority of potential development locations are within the AONB. Whilst one site (SHLAA reference 146) is promoted which is located outside of the AONB, proposals for development of the site have recently been refused under application reference 15/00166/OUT with the Council noting in its reasons for refusal that:

“By reason of its location, remote from the Town Centre facilities and with difficulty of access, the development would be isolated and heavily reliant on the use of private vehicles.”

2.69 The refusal has been appealed and the decision is currently awaited.

Suitable alternative sites outside the AONB do not therefore exist, and the
2.70 In proposing the allocation of the site the Council have assessed the site and concluded that "development of this site would not have a detrimental effect on the environment, landscape or any recreational opportunities." In response to the proposed allocation a planning application is in the process of being prepared for the development of the site and will be submitted in early 2017. To inform the proposals detailed technical work is underway and this informed the draft proposals which were the subject of public consultation in December 2016. A copy of the exhibition boards are provided at Appendix Two.

2.71 In summary the technical work undertaken to date has demonstrated that:

- Flooding – All new homes are on land classified as Flood Zone 1, which carries the lowest risk of flooding. New foul and surface water networks will be constructed to collect flows generated by the development. A Sustainable Drainage System will ensure that there would be no increase in flood risk to the surrounding local area.

- Heritage and Archaeology - the majority of the site is located within the Burford Conservation Area. There are a number of listed buildings located within the Conservation Area boundary. These buildings have been considered as part of the design process, in particular the views from the site to the surrounding Conservation Area. An archaeological assessment has been carried out to identify the presence of heritage assets. This assessment has identified that there are no designated archaeological heritage assets on the site and none within 1km of the site boundary.

- Ecology – a number of ecological investigations have been undertaken and are ongoing in order to assess the biodiversity value of the site. The habitats within the study area assessed are considered to be of a ‘lower’ value at the local scale. Further environmental studies are taking place and the emerging proposals include strengthening the existing boundary habitat, retaining the mature trees and reducing the impacts on the development upon habitats and species present.

- Landscape – as has already been discussed the site falls within the Cotswold AONB and any development will therefore need to respect the qualities and character of the AONB. The site benefits from existing trees and vegetation running along the site boundaries, which would be retained and added to as part of any future proposals. A landscape scheme for the site will include public open space, green infrastructure and additional planting and screening to integrate the development to the wider area.

2.72 The proposed allocation site is currently comprised of agricultural land and will not...

proposed allocation site is considered to be the most appropriate opportunity of those sites within the AONB, as confirmed by the Council through its draft allocation. It is considered that development of our client’s site would integrate well into the historical pattern or character of the settlement, noting the landscape character of the area. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated...
therefore impact on any existing recreational facilities. The proposed development will deliver a new area of children's play space and wider public open space for the enjoyment of both new and existing residents.

2.73 It is considered that the development would respect and conserve, and not obstruct, public views to higher slopes or skylines or sweeping views across the landscape. The building style will respect the local tradition and be to a high standard of design as befits a nationally designated landscape.

2.74 Given the above it is considered that the proposed allocation is sound and will make an important contribution to meeting local needs as well as those of the wider District.

Detailed Allocation Requirements

2.75 As discussed above we support the principle of the allocation of land east of Burford. Notwithstanding this, we do have some comments on the detailed requirements of the policy as discussed below.

2.76 The proposed allocation seeks the delivery of around 85 dwellings. Whilst we support the recognition that the site represents an appropriate location to accommodate residential development we do consider that the site also the potential to deliver a 60 bed extra care facility within the allocation site. The care home would help to meet the local needs for such a facility in an appropriate location which is well integrated with the existing services and facilities on offer within the town. The site is capable of accommodating this alongside the 85 dwellings proposed.

2.77 As such we consider the policy wording should be amended to the following: "Land to the east of Burford to accommodate 85 dwellings and up to 60 bed extra care facility as a well-integrated and logical extension of the existing built form of the town."

2.78 Criterion B of the policy requires: "provision of satisfactory vehicular access and appropriate pedestrian and cycle connections. Any vehicular access provided from the Witney Road will be required to contribute positively to the eastern approach into Burford providing a 'gateway' entrance to the town."

2.79 The supporting text to the policy notes that there are a number of options in terms of access and that in addition to the potential for access to be taken from Witney Street (incorrectly called Witney Road in the draft policy text), secondary access could be taken from Frethern Close/Wysdom Way and Barns Lane. The emerging proposals shown on the exhibition boards at Appendix Two take primary access from Witney Street with a limited number of units served from a secondary access off Barns Lane. The application will in due course will be accompanied by a detailed Transport Statement demonstrating the suitability of these access options.

2.80 Whilst the proposed access from Witney Street has paid due regard to the proposed allocation site boundary as a result of the additional technical work that has been undertaken by the consultant team it has been determined that it is not possible for the access to be achieved within the allocation boundary as currently proposed. The proposed access arrangement is shown at Appendix Three. In light of this it is
considered that the allocation site boundary should be amended to reflect that shown in red below (the existing proposed allocation boundary is shown via the dashed black line).

2.81 Subject to the above suggested amendments it is considered that the proposed allocation is sound.

2.82 Our consideration of the wider opportunities presented by our client’s land interests to the east of Burford are discussed in relation to Main Modification 200 and as such are not repeated here.

Sustainability Appraisal

2.83 The proposed allocation has been subject to detailed assessment in the Sustainability Appraisal Addendum Report (October 2016) prepared by Enfusion on behalf of the Council. In relation to the four proposed new non-strategic allocations in the Burford-Charlbury Sub-Area the Report confirms that no major significant effects were identified.

2.84 The conclusions of the Report in respect of the East of Burford allocation are shown below together with our comments and updated conclusions. (Attached)

I wish to object to the inclusion in the draft local plan of the proposal to allocate 85 new houses to the site to the east of Burford known as Cole's Field. My objection is on the following grounds:

1) The site is within the Cotswold Area of Outstanding Natural Beauty (AONB) and the Burford Conservation Area. Burford is a historic town with 252 listed buildings, economically supported by visitors, and is entirely unsuitable for a development of this size and character. Compared with a few decades ago, which I remember, it has only one general food shop; one Co-op. Most residents travel to Witney or Carterton for food shopping. The primary school is full and the surgery is always extremely busy.

2) It will affect detrimentally the wonderful views of the Windrush Valley with its renowned church and spire from the A40 coming from Stow-on-the-Wold and from the much frequented viewpoint Westhall Hill.

3) There was no prior consultation with Burford Town Council, our district councillor or the body which manages the AONB.

4) The site slopes steeply and there is a clear risk of flooding.

5) There is no suitable access. Witney Street is a narrow country lane which is prone to icing on Whitehill and flooding lower down. It has bends and was the site of a fatal car accident some years ago; it is already used as a rat-run. Frethern Close and Barns Lane are also narrow, made more dangerous by parked cars and vans.

On a personal level I am concerned at the general lack of housing in this country those in need. I have spent most of my professional life working on such housing projects but the site has to be appropriate.

I refer to the No 6 of the Council’s objections to 85 buildings to be erected on Cole’s Field.

Weekly recycling - personal responsibility of the individual householder - two bins - domestic and green - large plastic container on wheels - health and safety - to straddle the allotted houses - traffic vying for passing space on the road - future requested bus route for school children/older residents - “slopes gently” site flooded in unfavourable weather conditions - walkers intimidated - future residents also subject to these
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<tr>
<td>MM60 GfK</td>
<td></td>
<td>Andy Robertson</td>
<td>Mr</td>
<td>Robertson</td>
<td>134</td>
<td>Sub Area &gt; MAIN 193</td>
<td>Strenuous No 3 and 4 clause - for a proper survey of this popular area of Outstanding Natural Beauty and Conservation. Access is a huge issue. Access via Ditchley road from the Slade is currently dangerous as there is a blind corner from the Enstone crossroads. Ditchley road is not suitable for additional traffic as with parked cars it effectively is often a single carriageway. It is in poor repair in parts and there is no footpath on large parts. Extra traffic on the Junction with the Slade would cause additional risk to school children travelling to and from the local primary school. The local primary is over subscribed so families moving to this estate might have to travel to Enstone or other primary schools. Better to build nearer to a primary that is not oversubscribed. Access via Ditchley road and Chartwell Drive should not be allowed because this is a quiet estate with a large number of young children that play out on the estate. The site traffic alone would constitute an unnecessary additional risk to these families. The proposal to remove existing garages mean more parking on the road making this even worse. Hundley Way is not suitable for any further vehicular access at all, the turning is very dangerous already with speeding traffic and the road is private and narrow. The additional site traffic for the extension at Hundley House is already causing problems for other residents and the way is neither wide enough or in good enough condition to support any additional traffic. It’s hard for vehicles to pass each other currently. 40 houses is far in excess of what is required by local people. This is overdevelopment of a small rural town. This development serves only the land owner who is no longer resident in Charlbury and the developer. The recent development at the top of Elms Crescent had to be dug in. Will 40 houses be dug in on the highest part of this hill? If so that is a horrendously environmentally unfriendly way to develop. If they don’t dig them in then what were the reasons for digging the other houses in? The plot is adjacent to a bridleway from where any development would be highly visible due to the elevation of the plot. A recent request for a dormer window on a house on Hundley Way was declined because of the impact on the roof line of Hundley Way. Putting 40 houses on this field would destroy the feel of Hundley Way. The plot is green field and supports a lot of wildlife including Barn Owls, Bats, Grass Snakes, Slow Worms, Hedgehogs. The environmental impact would be huge on these species. The ground is rock hard with a thin topsoil so earth movements would be noisy and substantial and very intrusive to surrounding properties during the build. Run off from the field is a problem already with Hundley Way already getting extremely wet whenever there is rain. I believe there would be an impact on flooding of adjacent properties and paths if this beautiful field is paved, tarmacked etc. Development in an AONB should not be next to a bridleway used by locals and tourists. The views from the bridleway should be specially protected. The development of 40 houses on this highly elevated plot will have a massive visual impact from the bridle way. The existing tree line would not provide screening because of the elevation.</td>
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<tr>
<td>MM634</td>
<td></td>
<td>Charlbury resident</td>
<td>Mr/Mrs</td>
<td>Resident</td>
<td>1448</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 194</td>
<td>The field has beautiful mature tree lines and hedges that need to be very carefully maintained and protected during any development. We've got this well documented with video and images. The council should also be aware that there are covenants and option agreements on parts of this plot. This might also cause issues for development. This amendment should not have been made before the neighbourhood plan/local plan has been finalised.</td>
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<td>MM729</td>
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<td>R A Cutler</td>
<td>Mr</td>
<td>Cutler</td>
<td>1688</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 194</td>
<td>The proposed development takes all the site vehicles, support vehicles etc. and then 80+ residents cars through a tight residential area. The impact on residents of Jeffersons Piece and Elm Crescent etc. will be dangerous and dramatic. It is a residential area not a cut through plus with staggered and on street parking on Ditchley Road there is already often a tailback onto the Slade and the dangerous bend there. It will be much worse with more cars.</td>
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<td>MM74</td>
<td></td>
<td>Mr Moss</td>
<td>Mr</td>
<td>Moss</td>
<td>209</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 194</td>
<td>We are aware that paragraphs 115 and 116 of the NPPF attach great weight to conserving landscape and scenic beauty in Areas of Outstanding National Beauty, where major development should be refused except in exceptional circumstances. Given the constraints imposed by the AONB, we question whether any housing allocations in the AONB settlements is possible at this late stage of the plan. We suggest that the approach to plan-led development in West Oxfordshire’s AONB settlements such as Charlbury needs to be careful and considered, perhaps following the approach taken by local planning authorities such as Winchester, Horsham and North Kesteven where a plan-wide allocation for certain, smaller scale settlements is set, with development coming forward either as part of a Neighbourhood Plan or other locally supported initiatives, such as a Planning Brief, or by means of a planning application that is supported at the local/Parish level. This approach has been tested at EIP/hearings recently, and held to be sound.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2275</td>
<td>&gt; SECTION 9 - STRATEGY AT THE 9.6.34r</td>
<td>The site is currently in use as a paddock with access achievable via a private road (Hundley Way) although</td>
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<td>MM39</td>
<td>FalconVilla</td>
<td>Mr Wilkinson</td>
<td>84</td>
<td>LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 194</td>
<td>Land north of Jefferson’s Piece, Charlbury (40 homes) This may not be suitable for a significant increase in vehicle movements. There is however the potential to achieve vehicular access into Jeffersons Piece subject to the redevelopment/relocation of an existing set of single storey garages. It is not clear if the Land north of Jeffersons Piece, Charlbury (40 homes) site can directly access the adopted highway and controls all the land to do so.</td>
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<td>MM729</td>
<td>R A Cutler</td>
<td>Mr Cutler</td>
<td>1689</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 195</td>
<td>We are aware that paragraphs 115 and 116 of the NPPF attach great weight to conserving landscape and scenic beauty in Areas of Outstanding National Beauty, where major development should be refused except in exceptional circumstances. Given the constraints imposed by the AONB, we question whether any housing allocations in the AONB settlements is possible at this late stage of the plan. We suggest that the approach to plan-led development in West Oxfordshire’s AONB settlements such as Charlbury needs to be careful and considered, perhaps following the approach taken by local planning authorities such as Winchester, Horsham and North Kesteven where a plan-wide allocation for certain, smaller scale settlements is set, with development coming forward either (a) as part of a Neighbourhood Plan or other locally supported initiatives, such as a Planning Brief, or (b) by means of a planning application that is supported at the local/Parish level. This approach has been tested at EIP/hearings recently, and held to be sound.</td>
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<td>MM375</td>
<td>Charlbury Town Council</td>
<td>Mr S R Clarke</td>
<td>737</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL</td>
<td>Figure 9.17c – Land north of Jefferson’s Piece, Charlbury A new development off Ditchley Road and bordering the proposed site is nearing completion but the new homes are not shown on the map. This has an impact on the perception of the reading of the proposed site</td>
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### Respondent Information

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<tr>
<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1099</td>
<td>&gt; Burford CharlburySub Area &gt; MAIN 195</td>
<td>with respect to the current built environment.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>This site is within the Charlbury Conservation Area and is an area of historic landscape of some interest, next to what we believe to be the fairly ancient Hundley Way and between two evident areas of quarrying. Topographically, the routeways here are constrained by the deep valley to the north. The site is fairly distinctive, and might be considered a valued landscape.</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>Unfortunately there does not appear to be a Conservation Area Character Appraisal on the Council’s website, so without specifically undertaking our own assessment it is difficult to ascertain how valuable a contribution this site in its undeveloped state makes to the special interest, character and appearance of the Conservation Area. However, from our knowledge of the site and the considerations in proposed paragraph 9.6.34v, we consider that its development might be acceptable, if undertaken sensitively.</td>
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<tr>
<td>MM50</td>
<td>Diana Limburg</td>
<td>Dr</td>
<td>Limburg</td>
<td>114</td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>The main reason that I consider the proposed modification not to be sound is that Charlbury is in advanced stages of developing a Neighbourhood Plan, which will set out what the community should look like, including any sustainable development. No developments should be considered outside this plan and therefore inclusion of such developments in the Westoxon local plan is not right. This is why I also indicated that the modification does not comply with the duty to co-operate. Further objections are:</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>Charlbury is already growing beyond what the local infrastructure, in particular the school, but also for example roads and parking, can deal with. The primary school is already over-subscribed, with Charlbury children being forced to attend schools in neighbouring villages. Adding further housing stock (on top of the two developments mentioned that have already been granted planning permission for a total of 47 houses!) will exacerbate this problem. The school has no scope for expansion. Vehicular access to the proposed location is very difficult and could not be realised without severe impact on existing houses and roads, affecting both safety and living quality. While the proposal somewhat acknowledges the difficulties, it underplays both what it would take to realise the necessary road infrastructure and the impact of the changes on the existing roads and residents.</td>
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<tr>
<td>MM53</td>
<td>Dr C Battersby</td>
<td>Dr</td>
<td>Battersby</td>
<td>123</td>
<td></td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>With regard to the legality of the proposals, it is stated that to ensure that third parties are not prejudiced by changes to matters on which they would usually expect an opportunity to comment, any “main modifications” will normally be subject to consultation. It is furthermore stated that when a Plan is submitted to be examined, it marks the end of a long preparation process and that the process should have fully involved everyone who has an interest in the document, and provided them with the chance to comment where appropriate. The consultation period allowed for this modification with respect to land north of Jefferson’s Piece has been insufficient to allow all interested parties to be consulted—or, indeed, even hear about it. Thus, this was not an option that showed up in the recent consultation on the Neighbourhood Plan.</td>
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Development Plan for Charlbury (survey completed April 2016), and I saw no trace of this proposal in reading through earlier versions of the plan. Neither was there a display of the proposals anywhere in Charlbury during the short period of November 11 2016 and December 23 2016 when the consultation took place. As such, I feel that the lack of an adequate consultation period renders the modification invalid from a legal point of view.

The proposal is also unsound in relation to the proposed access to the site. It is recognised (9.6.34r) that there is, at present, no satisfactory vehicular access, but it is proposed that access be provided via the demolition of some garages in Jefferson's Piece. That, however, would entail routing all cars through an existing housing estate with narrow roads, sharp bends and already congested parking. The element of social and relatively low-cost housing on the estate means that in this area there are many school-age and young children and also bungalows for elderly people. Young children play out in the street, and the extra traffic would be dangerous to existing residents, and would detract from their enjoyment of their properties.

Even if a route could be found for the site that linked it to Ditchley Road without diverting through the estate, there would remain traffic problems. The bottom part of Ditchley Road is a road that is already much used by children walking to school as well as by traffic entering the estate, travelling up to Ditchley Park for conferences and the like, as well as to the various farms and houses along the upper, and more rural, section of this road. The lower part of Ditchley Road will shortly become even busier as the new housing estates along Ditchley Road, already under construction, are completed and occupied. The junction between Ditchley Road and The Slade is already dangerous, and the proposed development will only increase the dangers.

It is stated (9.6.34s and 9.6.34u) that the site is well screened, despite its high elevation. I can find no evidence in the documentation that this would be the case, and think it highly likely that the site would be visible on the horizon when approaching Charlbury from Enstone. If so, the distinctiveness of Charlbury as a cohesive and rural community which nestles within the landscape of the North Cotswolds AONB is likely to be threatened by further erosion of its visual boundaries. This is an additional reason to consider that there has been insufficient time for consultation, and to regard the proposal as unsound. As for the claim (9.6.34v) that there would be benefits from the removal of the existing garages, this is also not substantiated. Charlbury has at present a severe parking crisis in the town centre, and these are some of the very few garages available to rent in the town (mistakenly referred to as a village in the documentation).

Re: Planning Reference Numbers: Main 194 & 195

Although I did not receive a Copy of your letter dated 16th November, I am responding to it for as a resident of Ditchley Road, I will be massively affected by the proposed development. I urgently request that the following be taken into account when considering the proposed development.

1. The junction of Ditchley Road and The Slade is very dangerous at the moment without any increase in the volume of traffic.

2. Access to the site via Ditchley Road, Chartwell Drive, Elm Crescent and Jeffersons Piece is unsuitable for construction traffic. The small development currently taking place further up Ditchley Road has been a nightmare combined with the massive agricultural vehicles wishing to access Model Farm. The estate roads in The Paddocks are equally unsuitable and it would be a massive disruption for th residents. Ditchley Road is already showing hazardous signs of damage, both to the road and the verge.

3 The local primary school is already over subscribed with families having to convey children to Chadlington.
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| MM503         |                         | Henry Silford  | Mr              | Silford           | 1241       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 196 | and Finstock resulting in an increase in traffic manoeuvres. A development of this size would inevitably result in an increase in the number of pupils.  
4 The local services, i.e. bus and Post Office are already under threat of closure. The facilities available in the town are not adequate enough to accommodate a development of this size.  
For all of the above reasons I would request that you seriously consider rejecting this proposal. |
| MM533         |                         | Stuart Galer   | Mr              | Galer             | 1282       | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL | LETTER OF PROTEST AND OBJECTION TO THE PROPOSAL OF BUILDING FORTY DWELLINGS IN JEFFERSONS PIECE FIELD.  
If this proposal goes ahead it will TOTALLY AND COMPLETELY ERASE the way of life which is enjoyed at the present by the residence of the whole estate.  
From the meeting which I attended in Chipping Norton on the 23rd of November 2016, It was hinted by the representative that I spoke to that the possible access to the site could be the removal of some of the garages at the end of the road as these back onto the field.  
As you do not live here you cannot imagine what impact this will have on all of the residence in the whole estate.  
• Heavy plant machinery, building material lorries and all the other equipment vehicles all using a road which is inadequate due to the fact of parked cars outside of people's homes so it is virtually a single traffic road.  
• If this proposal goes ahead the traffic which on average is 2 to 3 cars per each household, all the vehicles used for people going to work both day and night not only cars but also vans and small lorries also. There will be no peace day or night because of the volume of increased traffic.  
• For many, many years the children of Jeffersons Piece and Kendal Piece have played safely on the square and on the little green outside the end of Kendal Piece BUT with the heavy influx of traffic this will remove the safe environment which they enjoy at present.  
• The impact on our local infrastructure. Shops, doctors and district nurses which are already under severe pressure is huge and as the school will see an increase of pupils from next June, if this proposal goes ahead, IT WILL NOT BE ABLE TO COPE nor will the surrounding villages as they too are also full to capacity.  
THE TRANQUILTY OF NATURAL LIFE  
• Within the field deer gracing in early morning and just before dusk foxes scurrying and slinking across the field. Sometimes in January vixen being pursued by dog foxes. Buzzards skimming across the grass before they rise for their aerial display. The bird life coming into the gardens will be lost.  
• Not only the residents of Jefferson Piece and Kendal Piece but also the residents in Chartwell Drive, Elm Crescent and The Green will be affected by the POLLUTION AND NOISE LEVEL WHICH WILL INCREASE DRAMATICALLY DUE TO ALL TYPES OF VEHICLES TO SERVICE A NEW ESTATE.  
The proposed site, north of Jeffersons Piece, has woefully inadequate access for the proposed 40 houses as stated in the Plan. The 2 possible access points are via Hundley Way or via the current garages in Jeffersons Piece. Firstly, it must be considered that 40 houses would result in at least 100 vehicles entering and leaving the site on a daily basis, given the ever-increasing popularity of home deliveries. Neither entry/exit route |
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<tr>
<td>MM602</td>
<td></td>
<td>Tessa Woodley</td>
<td>Mrs Woodley</td>
<td>1378</td>
<td>Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>could cope with the extra traffic. The exit of Hundley Way onto the Enstone Road is already hazardous. The roads from Jefferson Piece i.e. Kendal Piece, The Green, and Elm Crescent, are already congested with on-street parking and the exists onto Ditchley Road from Chartwell Drive and from Ditchley Road onto The Slade are already dangerous. The problem is exacerbated at school times. It should be also considered that the current school in Charlbury is full and many children living in Charlbury have to be transported out of the town for their schooling.</td>
</tr>
<tr>
<td>MM63</td>
<td></td>
<td>Lucy Robertson</td>
<td>Mrs Robertson</td>
<td>159</td>
<td>Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>This location is not suitable for development for the following reasons: access/highways - proposed access is through a very quiet housing estate which would not be able to cope with the extra volume of traffic. It could potentially be another 80 cars driving in and out of the site daily, as well as deliveries, postmen and refuse collections. The top turning round Jefferson’s Piece is very narrow. It is single carriageway as soon as you turn onto Ditchley Road and all the way through Chartwell Drive, the Green and Jefferson’s Piece with cars parked on the road. The Ditchley Road turning off the Slade is already dangerous and could not cope with the extra volume of traffic during construction and thereafter. It would back up to the Enstone crossroads and cause congestion. Vehicles often approach Charlbury from Enstone very fast and there have already been accidents at the crossroads. It is also very difficult for pedestrians to cross the road at times. The Slade is also very busy with vehicles often speeding when people are walking their children to school during the morning rush hour. Many young school children play in Jefferson’s Piece and the Green and walk to school so this would also make it more dangerous for them. The roads are currently in poor condition. Hundley Way is a blind turning and already dangerous. It is a single track bridleway that cannot cope with any extra volume of traffic. Infrastructure - the local primary school is already oversubscribed and I believe has been for the past 4 years. Families already living in Charlbury are unable to get places at the local school. New families would have to drive their children to school in surrounding villages which would cause extra traffic on the roads during the morning rush hour, or they could potentially take up places that people already living in Charlbury would have. Flooding - when it rains Hundley Way very quickly turns into a stream as it runs off the field and any more water may result in flooding. The site is currently an Area of Outstanding Natural Beauty in a Conservation Area which should be protected. It is an elevated site so would be visible from Hundley Way and further afield. It would destroy the beautiful ancient views towards Charlbury and along Hundley Way. There is an abundance of wildlife in the field including slow worms, bats, owls, hedgehogs and butterflies, it would be a shame for this natural habitat to be lost.</td>
</tr>
<tr>
<td>MM65</td>
<td></td>
<td>Anderton</td>
<td>Mr White</td>
<td>166</td>
<td>Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>If viewed in a detached manner from the air, or on a map, this plot of land has attributes that might make it seem suitable for development as a compact extension of the Charlbury nucleus of buildings and the earlier adjacent development, ‘The Green’</td>
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<td>MM729</td>
<td>R A Cutler</td>
<td>Mr Cutler</td>
<td>1692</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>BUT - and it is a very big but - when regarded in real terms at ground level the plot becomes less than suitable for development. It lacks practical access. 1 - Hundley Way which runs along the western edge is a bridle path which is too narrow to form even a minimum width estate road. 2 - Another potential entry point to the site from Jeffersons Piece on the southern boundary would require demolition of at least one house as well as some garages to achieve the requisite junction radii. Elm Crescent would become the feeder road to the new development and would be turned from a quiet residential street into a major thoroughfare with more than double the present traffic and its junction with Ditchley Road, which is already difficult, would be become dangerous. 3 - Ditchley Road at the eastern side of the site is also too narrow to be used as access on that side. In fact Planning Inspectors have previously turned down a proposed development of the quarry which lies along the south of Ditchley Road because of the road's unsuitability. It would be a visual intrusion into the Cotswold AONB The site is well elevated above Charlbury so its development would be far from 'hidden' and would be obvious from not only the town but from a large sector of countryside around. I would therefore object strongly to any proposed development of this site. David Anderton White Oxpens, Hundley Way Charlbury OX7 3QE</td>
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<td>MM752</td>
<td>Bloombridge</td>
<td>Mr Cutler</td>
<td>2050</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL Burford - Charlbury Sub-Area</td>
<td>As already stated, Policy HI should be amended to omit reference to new housing at the rural service centres of Burford and Charlbury. As stated above, the Proposed Modifications have increased th Burford - Charlbury</td>
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We are aware that paragraphs 115 and 116 of the NPPF attach great weight to conserving landscape and scenic beauty in Areas of Outstanding National Beauty, where major development should be refused except in exceptional circumstances. Given the constraints imposed by the AONB, we question whether any housing allocations in the AONB settlements is possible at this late stage of the plan.  

We suggest that the approach to plan-led development in West Oxfordshire's AONB settlements such as Charlbury needs to be careful and considered, perhaps following the approach taken by local planning authorities such as Winchester, Horsham and North Kesteven where a plan-wide allocation for certain, smaller scale settlements is set, with development coming forward either (a) as part of a Neighbourhood Plan or other locally supported initiatives, such as a Planning Brief, or (b) by means of a planning application that is supported at the local/Parish level. This approach has been tested at EIP/hearings recently, and held to be sound.
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<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>2051</td>
<td>&gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>Burford - Charlbury Sub-Area</td>
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<td>As already stated, Policy HI should be amended to omit reference to new housing at the rural service centres of Burford and Charlbury. As stated above, the Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 25% from 800 to 1,000 homes. Paragraph 115 refers to great weight and 116 of the NPPF clearly states that exceptional circumstances must be demonstrated to justify allowing major development in the AONB. This paragraph states that consideration of such applications should include an assessment of the need for the development and its impact on 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 and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area: however, that is not a reason to increase housing within the sub area. Given the deliverable opportunities to address housing need in those parts of the district outside of the AONB, recognising that there will still be 800 homes in the sub area, there have been no exceptional circumstances given for the inclusion of additional land within the AONB for development in the draft Local Plan. As a consequence, MM184 should be deleted as it refers to allocations at Burford, Charlbury, Shipton-under-Wychwood and Stonesfield, all within the AONB. The plan is not justified when considered against the reasonable alternative to development in the AONB and inconsistent with national policy.</td>
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<td>MM753</td>
<td>David Wilson Homes Southern</td>
<td>David Wilson Homes Southern</td>
<td>c/o Barton Willmore</td>
<td>2052</td>
<td>&gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
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<td>MM752</td>
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<td>Bloombridge</td>
<td>Mr</td>
<td>Cutler</td>
<td>2053</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>Burford - Charlbury Sub-Area As already stated, Policy H1 should be amended to omit reference to new housing at the rural service centres of Burford and Charlbury. As stated above, the Proposed Modifications have increased the Burford - Charlbury sub area proposed housing requirement by 25% from 800 to 1,000 homes. Paragraph 115 refers to great weight and 116 of the NPPF clearly states that exceptional circumstances must be demonstrated to justify allowing major development in the AONB. This paragraph states that consideration of such applications should include an assessment of the need for the development and its impact on 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 and the landscape. The Council appears to seek to justify this by indicating that development is of necessity within the AONB given the widespread extent of the AONB encompassing almost the whole of the sub area: however, that is not a reason to increase housing within the sub area. Given the deliverable opportunities to address housing need in those parts of the district outside of the AONB, recognising that there will still be 800 homes in the sub area, there have been no exceptional circumstances given for the inclusion of additional land within the AONB for development in the draft Local Plan. As a consequence, MM184 should be deleted as it refers to allocations at Burford, Charlbury, Shipton-under-Wychwood and Stonesfield, all within the AONB. The plan is not justified when considered against the reasonable alternative to development in the AONB and inconsistent with national policy.</td>
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<td>MM786</td>
<td>Oxfordshire County Council</td>
<td>Amada Jacobs (OCC)</td>
<td>Mrs</td>
<td>Jacobs</td>
<td>2212</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>Ecology and Natural Environment In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species. The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary. Charlbury – north of Jeffersons Piece The site is within the Cotswolds AONB. The site is close to Wigwell Nature Reserve and likely to generate additional recreational pressure. Further investment in Wigwell will be required to ensure its future resilience.</td>
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<tr>
<td>MM80</td>
<td></td>
<td>Jon</td>
<td>Mr</td>
<td>albymyn</td>
<td>224</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>I do not consider the Proposed modification sound as I do not think that this Greenfield site is suitable for housing. Extending the existing housing by infilling beyond The Green and Jefferson’s Piece will alter the edge of village character of the area, and impact the surrounding rural area and its amenity value. Hundley Way, beyond Tara, has mature trees and hedges and is enjoyed by many regular walkers, including those residing at the Cotswold View Caravan and Camping Park. It provides access to the Wychwood Way and many other popular walks. The further population will create additional pressure on Schools, Public Transport and other local amenities, that are already under very considerable pressure. The Proposed site is also one of the furthest parts of the village from the railway station, which seems illogical. The proposed site is on a steep gradient and this would most likely impact the drainage towards “Clark’s Bottom”, which is an important and ancient SSSI. Hundley Way is not suitable for further traffic, it is a private, unmade up road with a dangerous junction onto Enstone Road; it eventually becomes a bridlepath and so attracts a number of riders, mountain bikers and runners. Access from Jefferson’s Piece via Ditchley Road towards The Slade is similarly entirely unsuitable for any further traffic. Please kindly acknowledge these objections by email. Many thanks.</td>
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<tr>
<td>MM84</td>
<td></td>
<td>R. Harvey</td>
<td>Mr</td>
<td>Harvey</td>
<td>228</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>I would like to comment on recent modifications to the WODC local plan that are available for consultation, re section 9. In response to government pressure to identify additional land suitable for housing, district planners have proposed land to the north of Jefferson’s Piece in Charlbury as suitable for development of up to 40 houses. In the absence of a neighbourhood plan which would give a greater local say on planning matters, I would like to object to this proposed site being identified in the local plan on the following grounds: Green field - this is a green field site on the edge of a village, currently used as a paddock, and is within the conservation area and AONB. The bridleway adjacent to the field is used by a large number of Charlbury people and many others for walking, cycling and riding seeking to get to open countryside. The environment and its diverse wildlife will be lost forever. Don’t these designated protected areas count for anything? Further, any new housing on this site will be much more conspicuous than currently acknowledged, since the site is at a high point in the village sloping to the west. Access – with the number of potential new houses, up to 80 additional cars could be accessing the site, toing and froing daily. Neither of the proposed options are viable for further vehicular access. One option to remove garages and thus enable access through an established, built-up housing estate is a poor idea. Related to this, the Ditchley road turning has previously been acknowledged by the council as particularly difficult, given the speed of cars approaching around a blind bend on The Slade and parked cars on Ditchley Road restricting access. The other option, via Hundley Way, is a non-starter. This is a quiet, narrow, rural bridleway with access to the paddock unlikely and any increase in vehicle numbers highly undesirable. Ingress and egress from Enstone Road is particularly hazardous. For either option, construction traffic accessing the site during the building phase would be extremely disruptive and would be intolerable for local residents. Road Infrastructure – roads around the site have already become extremely busy in recent years and cannot...</td>
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cope as it is. Sturt Road, Enstone Road and the junction between them, have seen a large increase in the volume of cars as it has become a more popular through route to and from Witney and Banbury. Without adequate traffic calming measures they have, as a consequence, become increasingly dangerous as witnessed by recent accidents at the junction. Our children have to access the school along the pavements of both these roads.

Schooling – the Charlbury Primary school is already over-subscribed, so given the distance of the proposed plot from the school, under the county council allocation rules, any new residents are unlikely to find a place for their children in Charlbury. This will increase road traffic further as they are forced to drive to other villages. Schools in neighbouring villages have spaces, yet don't have the numbers of children living locally to fill them. Perhaps, planners should be looking to add houses to these places first, so that there is joined up thinking and a coherent plan.

There are many other aspects I could mention, but I focus on the major areas of objection. In summary, I believe this site to be unsuitable for any significant housing development for the aforementioned reasons. Any future development in Charlbury requires a holistic solution to the existing issues, and if housing is to be permitted, developers should be required to make a significant contribution to address these first.

I would like to object to the proposal to build 40 houses on land north of Jeffersons Piece for the following reasons.

1. There is no suitable access to the site, either through The Green or via Hundley Way.
2. It is a conservation area and designated an AONB.
3. The infrastructure cannot cope, the school already has to turn Charlbury children away as it is, without more houses being built.

I have two main objections to the inclusion of the field by Jefferson's Piece as a site for housing in the draft local plan. Before I list them I should say that the site is otherwise ideal for a smaller development. BUT:

1 HIGHWAYS It is impossible to safely access the site for construction purposes as well as for cars to access the site afterwards. The suggested access would be gained by demolishing some garages and accessing the site via the Green estate. This is a ludicrous suggestion. The volume of car traffic post-hoc would make life for residents on the Green an enduring misery, parking blocks already makes the accesses suggested unviable, and it would put an end to the current children's habit of street play. Access via Hundley Way is impossible: this unadopted bridleway is too narrow for any volume of traffic and its junction with Enstone Rd is already a danger spot which should not be exacerbated. Access via Ditchley Rd is presumably not possible.

2 LOCAL SERVICES A significant housing estate would put an intolerable strain on local services, most notably the Primary school. It is not acceptable to build housing where children are already unable to go to their local school. You need to build a school before you build an estate. Local roads would be unable to cope with hundreds of additional car movements every day. The estate is the wrong side of town for easy train access.

Another point I would make, if 1) and 2) above did not pertain and override it, is that the site is too small for 40 homes. The stingy house and gardens sizes offered by greedy developers are in my view unacceptable. Affordable family homes should have decent front gardens (that are not just a parking space), decent back gardens (I mean at least 200m2) and room around the home for extension as families grow. The cheek by jowl development that greedy developers love is stingy and wrong. I oppose Charlbury Town Council's policy on this regard. WODC should do everyone (apart from the developers) a favour and oppose stingy proportions.
You should remove this suggestion for Charlbury until such a time as Charlbury Town Council has formed its own local plan, which as you will be aware is in the pipeline.

There are other sites around town that do not have the same access problem - e.g. west of the forthcoming Rushy Bank development there is a large field with direct access to the Burford Rd and to the train station, with easier access to the town's facilities than developments on the northern and eastern edges. If a development went ahead on this site, a tall and mature line of trees would permanently screen the site from Charlbury itself. Have sites like this been looked at? Should locations where the schools struggle for spaces not be prioritised above Charlbury where the school is already oversubscribed? E.g. Enstone with good bus connections and Finstock with its own station?

I wish to object most strongly to the inclusion in this Plan of a development of 40 houses on land north of Jefferson's Piece. The access would be through the estate where I have lived since the estate was built and the roads do not lend themselves to such a development. There was great disruption when the small development was built at the top of Elm Crescent. The garages are largely used for storage as they are too narrow for modern cars and when families have 2 or more they have to park on the street. The development would add hugely to the traffic using these narrow roads. At present children can play outside especially in the cul de sac which is proposed as access to the estate.

The site is greenfield and in an AONB and Conservation area. It would damage the environment and detract from the lives of the present residents of the estate unless some alternative access is provided but there would remain the issues concerning the damage to the AONB etc. Please see below for my initial email re the above. I would like to raise formal objection to the planned
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<td>MM144</td>
<td></td>
<td>Colette Ashley</td>
<td>Mrs Ashley</td>
<td>320</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>I am writing to object to the plans to build 40 houses on the land behind Jeffersons piece, Charlbury. * Entrance: the entrance you propose is unsustainable. The gap is too narrow, there are too many cars parked around the roads already. Getting rid of the garages just encourages people to park their cars wherever they can. * Traffic: 40 houses will bring at least that many cars if not double, along the already crowded streets, causing extra pollution and extra noise, in what is supposed to be an ‘area of outstanding natural beauty’. Not very beautiful if you turn it into a housing estate! * Education: More houses will bring more children to the village and the school is already full. Your argument that they can go to surrounding schools is not sustainable because the surrounding schools are also full. If there was spaces in surrounding schools you are expecting the county council to transport these children to the nearest available school. At a time when the county council has to cut their budget by millions this strategy is untenable. Not only are you expecting the county council to pick up a bill for your lack of foresight, you will again be introducing more cars and more pollution to the area in the form of the taxis that will be employed to take these children to school. There is obviously no joined up strategical thinking here. Having one school for the village encourages social cohesion and harmony. Building these houses with no further infrastructure, will split the community and encourage crime and social unease. * Wildlife: What is the point of designating an area to be protected if you are going to build all over it? What will happen to the bats and the lizards and the red kites who all use this land to build their homes? In conclusion, I am sure this email won’t make any difference to your plans. You don’t live here so why would it? You obviously don’t care about the wildlife or the people living here, or a way of life that is slowly being disintegrated by your greed. The only thing I can do is to let you know that I object!</td>
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<td>MM159</td>
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<td>Duncan Forbes</td>
<td>Mr Forbes</td>
<td>348</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>We are responding to the revised West Oxfordshire Local Plan primarily as it relates to Charlbury, where we live. 1) Please note that bus services are no longer as stated in 9.6.13: &quot;...Services through Charlbury are good, with hourly direct services to Woodstock, Oxford, Witney and Chipping Norton.&quot; Since the withdrawal of the OCC subsidy there is no longer an hourly service from Charlbury to Witney and Chipping Norton. In order to continue the service at all the operator has had to reduce the timetable so that there are now some long &quot;gaps&quot; in the service during the day. 2) Whilst I concur with the strategic objective of planning for “Sustainable communities with access to services and facilities” (3.3), it should be noted that in Charlbury the trend has been the other way and continues to be so. In addition to the reduction in bus services noted above (the existing service is by no means secure), several retail outlets in Charlbury have closed in recent years, including the newsagents/café. The Post Office is currently under notice of closure, with no alternative in prospect. This would be a major blow to Charlbury and force those seeking Post Office services to travel out of the town, at a time when the...</td>
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reduction of car travel is an objective of the plan (3.5). Action will need to be taken to halt the gradual attrition of the local infrastructure and where necessary to enhance it, if the strategic objectives of the Plan are to be met – see below.

3) What follows are specific comments on the impact of the proposed development of 40 houses adjacent to Jefferson's Piece, Charlbury: (9.6.34 and following):

* a) Throughout the Plan there are references to the importance of ensuring that local infrastructure keeps pace with housing development. (e.g 3.3, 3.11, 3.12 - "Ensure that land is not released for new development until the supporting infrastructure and facilities are secured."). etc. It is vital to ensure that proper plans are in place, either by WODC or other responsible bodies, to ensure that the additional housing now in the pipeline and proposed in the plan for Charlbury is matched by infrastructure developments. Without these the stated objective of "Ensuring that new development is supported by appropriate investment in new and/or enhanced infrastructure including education...etc" (4.7) will not be met. Specifically:

* i) Primary School provision. The plan states that "pressure on school capacity is expected to continue in most schools in this area." (9.6.24) Even at the present time Charlbury school is full, and a catchment area has had to be determined which excludes parts of Charlbury. This means that very young children have to attend school in Finstock: for parents without access to a car, journeys to and from school daily are extraordinarily difficult. The proposed new housing should include a good proportion of affordable homes – noted (9.6.5) as being especially important in Charlbury. The occupants of such homes will likely include a good number of school-age children. It is essential that no further housing be approved in Charlbury unless or until adequate Primary School provision is guaranteed.

* ii) Medical services. Is the Council satisfied that the existing Charlbury Medical Practice can cope with the additional demand of the extra population? As noted above, it is to be expected that affordable housing will lead to inward movement of families with children. Those who put the most pressure on medical and nursing services are overwhelmingly the very young and the old. These are the groups who are least likely to have access to a car to travel to the nearest alternative medical practice in Chipping Norton or Witney.

* iii) Transport. As noted above, the bus service between Charlbury, Witney, and Chipping Norton is currently dependent on its continuing to be a commercially profitable enterprise. It is used as a vital service by those without cars who need to shop and/or access services not available in Charlbury (e.g. opticians, solicitors, etc). This service is a vital part of the public transport infrastructure for those in Charlbury without a car, and no new housing development should be approved unless its sustainability is assured.

* b) Pedestrians and vehicles. Section 7.14 of the Plan includes the following design criteria:

"- giving priority to pedestrian and cycle movements;
- providing access to high quality public transport facilities;
- creating safe and secure layouts which minimise conflict between traffic and cyclists or pedestrians".

The existing housing area accessed from Chartwell Drive (i.e. Elm Crescent, Jeffersons' Piece, The Green, etc) has light traffic. Children are used to walking or cycling in this area. As a condition of any development on the Jefferson's Piece site, the Council should require traffic calming measures in the whole of the existing and proposed new housing area in order to give pedestrians and cyclists priority and reduce vehicle speeds to a minimum.
Pedestrians are currently not well served in Charlbury. Footways are often on one side of the road only, or come to an end at a "pinch point". There are examples of this on Hixet Wood, Pullens Lane, Dyers Hill, Dancer's Hill, Nine Acres Lane, and on each of the four roads approaching the Enstone Crossroads. The latter is especially hazardous, and has to be negotiated by pedestrians walking from the area of The Green/Jefferson's Piece into the Town centre or towards the bus stops or Railway Station. The Enstone Crossroads is busy at most times of day and there is very limited visibility for pedestrians trying to negotiate it. Following a recent serious accident here there has been much local discussion on the need to improve safety at this point. Improved pedestrian safety here is vital if the proposed housing is to be approved as part of the Plan.

I am writing from property 4, Hundley Way in Charlbury in connection with the following:

Land north of Jeffersons Piece, Charlbury to accommodate around 40 dwellings as a well-integrated and logical extension of the existing built form of the village

I am writing to oppose this, as we feel that it is not a logical place to build 40 houses with access via Hundley Way.

9.6.34r This is a greenfield site of around 1.7 ha on the northern edge of Charlbury. It sits on relatively high ground (135m AOD) sloping down to the north towards a small valley. It abuts an area of existing residential development at Jeffersons Piece with open countryside to the north and two detached properties to the north east. To the east of the site are several large residential curtilages. The site is currently in use as a paddock with access achievable via a private road (Hundley Way) although this may not be suitable for a significant increase in vehicle movements. There is however the potential to achieve vehicular access into Jeffersons Piece subject to the redevelopment/relocation of an existing set of single storey garag

Access via Hundley Way would be totally inappropriate and we believe that the proposed development is a direct contravention of 9.6.34r. It does not respect local context and street pattern or, in particular, the scale and proportions of surrounding buildings, and would be entirely out of the character of the area, to the detriment of the local environment. Access via Hundley Way is already problematic, as a single lane carriageway with no passing places. Extension or improvement of this carriageway would totally infringe upon the street pattern and farmland. There is already far too much pressure on this road with access from HGVs. There are a number of villagers, dog walkers, children and family who walk up the Bridleway daily to access the country footpaths and therefore it would cause a risk to the well-being and safety of the children/families/dogs. As an un-adopted bridleway it could not cope with the extra volume of traffic.

Furthermore, the turning from the Slade into Hundley Way is extremely dangerous on a blind corner. There would be a huge risk to the safety of drivers on this highway if the volume of traffic turning from Hundley Way were to increase.

9.6.34t In terms of policy constraints, the site is within the Cotswold AONB and is also within the Charlbury Conservation Area. These are important considerations but not preclude the possibility of development. In terms of the AONB, as major development a scheme of 40 new homes in this location would need to satisfy the tests set out in national policy. In this regard the development would make a useful contribution towards meeting identified housing needs in a sustainable location with access by rail. There would also be some modest economic benefits as a result of the construction of the new housing.

We consider the proposed development to be a direct contravention of the following objective from the same chapter: "To protect or enhance the local environment, including wildlife habitats, trees and woodland
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<tr>
<td>MM159</td>
<td></td>
<td>Duncan Forbes</td>
<td>Mr</td>
<td>Forbes</td>
<td>470</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>parks and gardens'. Where you would have to remove a significant number of hedges and trees along Hundley Way infringing on the views for all of those who access Hundley Way to the footpaths towards Ditchley. The outlook of these houses from the Slade would totally contravene with the Conservation Area. Furthermore it would be reasonable to ascertain whether the properties on Hundley Way would be overlooked? Furthermore, what about the pressures on the local schools? Any development in this area will make this worse. Also the housing and access via the garages to the rear of Hundley way would be put under significant pressure, volume of traffic would be too high. I believe there are better served locations on the outside of the village. Where highways and access would not be put under pressure. This is not an area of waste land, the land and access is used frequently. Access is not achievable, not only due to the dangerous turn from the Slade but Hundley Way could not cope with more than the current residents accessing it by car/bicycle. We are responding to the revised West Oxfordshire Local Plan primarily as it relates to Charlbury, where we live. 1) Please note that bus services are no longer as stated in 9.6.13: &quot;...Services through Charlbury are good, with hourly direct services to Woodstock, Oxford, Witney and Chipping Norton.&quot; Since the withdrawal of the OCC subsidy there is no longer an hourly service from Charlbury to Witney and Chipping Norton. In order to continue the service at all the operator has had to reduce the timetable so that there are now some long &quot;gaps&quot; in the service during the day. 2) Whilst I concur with the strategic objective of planning for “Sustainable communities with access to services and facilities” (3.3), it should be noted that in Charlbury the trend has been the other way and continues to be so. In addition to the reduction in bus services noted above (the existing service is by no means secure), several retail outlets in Charlbury have closed in recent years, including the newsagents/café. The Post Office is currently under notice of closure, with no alternative in prospect. This would be a major blow to Charlbury and force those seeking Post Office services to travel out of the town, at a time when the reduction of car travel is an objective of the plan (3.5). Action will need to be taken to halt the gradual attrition of the local infrastructure and where necessary to enhance it, if the strategic objectives of the Plan are to be met – see below. 3) What follows are specific comments on the impact of the proposed development of 40 houses adjacent to Jefferson’s Piece, Charlbury: (9.6.34 and following): * a) Throughout the Plan there are references to the importance of ensuring that local infrastructure keeps pace with housing development. (e.g 3.3, 3.11, 3.12 – (“Ensure that land is not released for new development until the supporting infrastructure and facilities are secured.”), etc. It is vital to ensure that proper plans are in place, either by WODC or other responsible bodies, to ensure that the additional housing now in the pipeline and proposed in the plan for Charlbury is matched by infrastructure developments. Without these the stated objective of “Ensuring that new development is supported by appropriate investment in new and/or enhanced infrastructure including education...etc” (4.7) will not be met. Specifically: * i) Primary School provision. The plan states that &quot;pressure on school capacity is expected to continue in most schools in this area.” (9.6.24) Even at the present time Charlbury school is full, and a catchment area has had to be determined which excludes parts of Charlbury. This means that very young children have to attend school in Finstock: for parents without access to a car, journeys to and from school daily are extraordinarily difficult. The proposed new housing should include a good proportion of affordable homes – noted (9.6.5) as being especially important in Charlbury. The occupants of such homes will likely include a good number of school-age children. It is essential that no further housing be approved in Charlbury unless or until adequate Primary School provision is guaranteed. ii) Medical services. Is the Council satisfied that the</td>
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existing Charlbury Medical Practice can cope with the additional demand of the extra population? As noted above, it is to be expected that affordable housing will lead to inward movement of families with children. Those who put the most pressure on medical and nursing services are overwhelmingly the very young and the old. These are the groups who are least likely to have access to a car to travel to the nearest alternative medical practice in Chipping Norton or Witney.

iii) Transport. As noted above, the bus service between Charlbury, Witney, and Chipping Norton is currently dependent on its continuing to be a commercially profitable enterprise. It is used as a vital service by those without cars who need to shop and/or access services not available in Charlbury (eg opticians, solicitors, etc). This service is a vital part of the public transport infrastructure for those in Charlbury without a car, and no new housing development should be approved unless its sustainability is assured.

* b) Pedestrians and vehicles. Section 7.14 of the Plan includes the following design criteria:

- giving priority to pedestrian and cycle movements;
- providing access to high quality public transport facilities;
- creating safe and secure layouts which minimise conflict between traffic and cyclists or pedestrians”.

The existing housing area accessed from Chartwell Drive (i.e. Elm Crescent, Jeffersons’ Piece, The Green, etc) has light traffic. Children are used to walking or cycling in this area. As a condition of any development on the Jeffersons’ Piece site, the Council should require traffic calming measures in the whole of the existing and proposed new housing area in order to give pedestrians and cyclists priority and reduce vehicle speeds to a minimum.

Pedestrians are currently not well served in Charlbury. Footways are often on one side of the road only, or come to an end at a “pinch point”. There are examples of this on Hixet Wood, Pullens Lane, Dyers Hill, Dancer’s Hill, Nine Acres Lane, and on each of the four roads approaching the Enstone Crossroads. The latter is especially hazardous, and has to be negotiated by pedestrians walking from the area of The Green/Jeffersons’ Piece into the Town centre or towards the bus stops or Railway Station. The Enstone Crossroads is busy at most times of day and there is very limited visibility for pedestrians trying to negotiate it. Following a recent serious accident here there has been much local discussion on the need to improve safety at this point. Improved pedestrian safety here is vital if the proposed housing is to be approved as part of the Plan.

Duncan and Angela Forbes

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<td>MM260</td>
<td>Lesley Algar</td>
<td>Ms Algar</td>
<td>473</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>I was unable to find the link on your website to complain about the extra housing proposed as were other residents who will be affected by this development. My last two email bounced back. In view of these problems I hope you accept this email as a resident who will be badly affected by the proposed housing development. Charlbury cannot sustain a development for the following reasons. It is AONB. There are bats living in trees in the field off Hundley Way. I believe it would only be fair to the residents to have an independent person visit this site. The roads of Jeffersons Piece, Kendal Piece, The Green could not cope with extra traffic as they are narrow roads.</td>
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| MM264 M Scarsbrook Mr Scarsbrook 477 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 196 | I am writing in reference to the above Planning application regarding the proposed development of 40 houses at Jeffersons Piece, Charlbury.

I live in Elm Crescent, Charlbury, which is the road proposed for the access to the site, and am writing to register my objections to the proposed development of 40 homes on the land off Jeffersons Piece, Charlbury.

This is a greenfield site within the Cotswold Area of Outstanding Natural Beauty and in the conservation area. The field is also home to a large number of wildlife. 40 new homes on such a small site would have a huge impact on the environment and the surrounding estate. 40 new homes could easily generate up to 80 vehicles travelling through the estate of Chartwell Drive, Elm Cresent and Jeffersons Piece, causing a great deal of noise and disruption to our quiet estate.

Charlbury Primary School is already full, and currently even new-comers to Charlbury are unable to gain admission to to Charlbury Primary School and are are having to travel to nearby schools, namely Chadlington and Finstock. To build 40 new homes would inevitably attract families with young children and with no room to educate them locally would mean that families would be forced to travel outside the village to other schools. I would ask the question- what about encouraging children to walk to their local school?

I appreciate the Local Authority’s requirement to build new homes, but the Jefferson Piece site is definitely not the right site to develop. There are other sites in Charlbury that have already been identified to develop, namely the land at the end of Ticknell Piece Road. If it is necessary to build more houses is Charlbury, this site would be more appropriate, however, the question of the availability of school places is still an issue?

In conclusion, on behalf of all the residents of Elm Crescent, Chartwell Drive and Jeffersons Piece, I would ask your Planning Committee to reject this proposal. |
| MM270 Maria Campbell Ms Campbell 483 | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > | Dear Sir/Madam,

We have become aware of the proposed development of the land north of Jefferson’s Piece, Charlbury and are writing with our comments and concerns.

We live at 1 Chartwell Drive and believe the following issues arise:
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| MM276         |                         | Maureen Walker  | Mrs Walker       | Walker              | 490        | MAIN 196          | 1. Access - the proposed access via Chartwell Drive is problematic and would necessitate a large, additional volume of vehicles negotiating a residential area and a tricky access point into the development. 

We live on the corner of Ditchley Road and Chartwell Drive and see many vehicles taking the junction far too quickly. As they whiz round the corner, other road users are endangered. It is already a very busy junction.

In our opinion, it would be better to site any access into the development further up the Ditchley Road.

2. Special character of area - Chartwell Drive, Elm Crescent and The Green are very lucky to house a mixture of residents, notably older people who walk a lot and young families. The area offers that rare thing these days and that is the freedom for children to play safely in front of their houses with their friends and neighbours.

It seems this aspect in particular would be endangered by the proposed development and the area would become a busy suburban area rather than the safe community it currently is.

A lower density of houses - maximum half the number - could perhaps blend into the existing setting, but not the large-scale proposal.

3. Local infrastructure - you are doubtless aware that many local families are not able to access Charlbury Primary School due to over-subscription and therefore have to take their children to other local schools such as Chadlington and Enstone. This situation would not improve with such a high-density development.

4. Conservation area - we are often reminded that the whole of Charlbury is a conservation area and therefore certain rules and regulations apply. Please let us know how the new development would meet the obligations under the conservation area.

5. Site safety - we would also have concerns over safety during any building process. As you are aware, the small development further up the Ditchley Road has been on-going for some time and the heavy lorries, diggers, flat beds, service trucks etc. have resulted in some disruption and damage to verges, pavements etc.

We would have grave concerns about such vehicles accessing the proposed site through the residential area.

We look forward to hearing from you in response to these comments.

Please confirm safe receipt of this e-mail and do not hesitate to contact us if we can provide further details or be of any assistance.

With regards

Maria and John Campbell

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<td>P &amp; S Chisman</td>
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<td>513</td>
<td>Sub Area &gt; MAIN 196</td>
<td>roads on the Paddocks estate (Chartwell Drive, Elm Crescent and Jefferson’s Piece). None of these roads were built with this amount of traffic in mind. A recent development in the Ditchley Road has caused a lot of disruption and decay of the road surface and boarders and on completion will already add to the traffic using this access. The Ditchley Road is also used by heavy farm vehicles and haulage contractors from the Ditchley Estate. At the beginning of the Ditchley Road from The Slade, there is a row of original cottages which have no parking space and therefor have to park on the road, this means that most of the time there is a row of cars parked making the entrance to the road single file, which can cause tail backs on to The Slade and a dangerous corner. Obviously more traffic will exacerbate this problem. If for some reason it is thought that the Ditchley Road can be widened in some way it needs to be borne in mind that the verges on the southern side of the road are not part of the public highway. They are in the ownership of the occupants of the individual houses. I would be grateful if you would acknowledge receipt of this email and in the future keep me informed of the progress of this application</td>
</tr>
<tr>
<td>MM311</td>
<td>Priscilla Frost</td>
<td>-</td>
<td>Frost</td>
<td>555</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>We are contacting you in reference to the above proposal as concerned residents of Chartwell Drive, Charlbury. From the plan accompanying your letter it would appear that access to site would be via Dichley Road and Chartwell Drive then either Elm Crescent or The Green to Jeffersons Piece. This is a totally residential area and the inevitable increase in traffic is the immediate cause for concern. Chartwell Drive and Ditchley Road are the “neck of the funnel” for all traffic, especially schoolchildren attending schools at Charlbury, Chipping Norton and beyond. They then enter and cross The Slade which is already a very busy road. Parked vehicles in these roads are already at a dangerous level at times and further development will make things worse. On the subject of schools, Charlbury Primary is already having to turn away local children due to capacity levels. Environmentally, the site is greenfield within the Cotswold AONB. It has been fallow for many years and has become a haven to many species of wildlife. We appreciate the requirement for housing but we are sure that this end of the town is not the place for this scale of development. We respectfully ask the Planning Committee to reject this Proposal.</td>
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<td>I have looked through the documentation under Main 194 and Main 195 to see the proposals which have been put forward under the new structure plan for Oxfordshire up to 2031. I would like to make the following comments: * Charlbury, as you know, is well served by the Great Western Railway – and this has been one of the items flagged up by the proposal. However, as I believe the proposed development of 40 houses will be low cost – there is little likelihood that owners/part owners would use the railway. * The local bus service has now been curtailed due to county cutbacks. * The result will be, of course, mean that travel to and from work/school/shopping will, of necessity be by car</td>
</tr>
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</table>
* The increased traffic – allowing for at least 2 cars per household – of c. 80 cars (and over 100 car movements per day) will impede on the already crowded streets surrounding and abutting Jefferson’s Piece.
* Elm Crescent/The Green/Chartwell Drive and the Ditchley Road are choked with cars parking on these roads and the impact of yet more traffic is not welcome.
* Construction vehicles will not – I suggest – be able to deliver housing materials through these narrow streets. We have seen more than enough of large lorries and construction vehicles using the Ditchley Road for the construction of the new development of ten houses which are currently being constructed.
* Incidentally planning permission was granted for 8 houses and I now believe that there are 10 – an underhand move which developers seem so capable of getting through the planning committees.
* The infrastructure of Charlbury’s local facilities have not, it appears, been taken into account.
* The primary school has not been able to take all the children who live within Charlbury itself for the past 5 years. Children from some areas of the town are having to be taken to Finstock Primary school.
* The impact of yet more children (of which there are bound to be some) living in the 40 proposed new houses will mean that they too will have to be schooled elsewhere.
* There is no secondary school here as you know – therefore more transport will be required for taking children to the schools at Chipping Norton/Woodstock/Witney etc.
* There are fewer teachers today, making classes larger, and thereby education less constructive throughout the county.
* The surgeries: doctors and dentists are already up to capacity and appointments are difficult to come by. This does necessitate people having to go to Chipping Norton, whose facilities are also over-stretched.
* The town centre lacks shops – apart from the Co-op, the Londis Store, the Post Office and one or two other private shops, to encourage people to stay in the town and keep them open.
* The area has been designated an AONB and yet here you are suggesting that this ‘green belt’ should be built upon! Serious consideration should be taken before allowing further development in Charlbury. Although you say in your planning proposals – under Main 240 that ‘no current application – but the site has been promoted for development and is considered likely to come forward by 2021’ in reality it is likely to be earlier than this date, is it not?
* Charlbury is under huge pressure to be swamped by further housing – and with an infrastructure that is bursting at the seams already – how can this proposal be allowed?

The Charlbury Neighbourhood Forum is a community group set up by the Charlbury Town Council. It is currently preparing both Community Led and Neighbourhood Development Plans on the Council’s behalf. While I am a member of the Forum, this representation is made in a personal capacity as an interested local resident who was a Planning Inspector from 1991-2015.

This objection is made to the proposed allocation of land to the north of Jefferson’s Piece for housing development, at paragraphs 9.6.34r-w and Policy BC1c. At the time of writing, so far as I am aware, the Town Council has not reached any conclusion on the appropriateness of the proposed allocation. I wish to stress this is a personal objection, primarily on the grounds of prematurity.

The supporting text at 9.6.34t & u illustrates the flaw at the heart of the Plan which I have set out in my major objection to the setting of housing targets within the AONB. Even if that is not accepted, the AONB is not just an ‘important consideration’, it attracts the “highest status of protection in relation to landscape and scenic beauty” (NPPF 115). Charlbury is not “washed over” by the AONB. That is an expression lifted from former Green Belt guidance where it had a particular implication. Its continued use elsewhere is clearly designed to water down a designation’s importance in the mind of the reader. This is a simple question of...
fact. The whole town is within the AONB, forms part of it and the policies applicable to it apply with equal force whether within or adjoining the built up area.

Forty dwellings might well make a ‘useful contribution’ to the District’s needs but as in my major objection, that begs the question of why those, as opposed just to the local community’s needs, should be met in the AONB. There is no evidence – as yet – that this number of dwellings is needed to meet local needs.

Which brings me to the Neighbourhood Plan – if first by way of the Local Plan. Even if it is accepted that an ‘indicative distribution’ of 1000 dwellings should be imposed on the B/C sub-area, para 9.6.27 of the plan, even in its revised form, says: “At Charlbury, capacity for further housing within the town is also limited. There are no large previously developed sites and the historic core forms a tight settlement with little potential for new housing, even on small sites. Even within the post-war housing estates, there are few possibilities for intensification of development. The sensitivity of Charlbury’s strong landscape and environmental setting mean that significant development on the fringes of the town is unlikely to be acceptable although there is some scope for additional development at Charlbury as well as the Wychwoods and Stonesfield of an appropriate scale and type.”

Leaving aside the unanswered question of what is ‘the appropriate scale and type’, but having walked extensively around the town while looking at it from a planning perspective, I agree almost entirely with this paragraph. Where it all but inexorably leads is to a conclusion that the scope for housing development in and around Charlbury is so limited that between them, the Local and Neighbourhood Plans should only seek to meet genuinely local needs (and even if my major objection on targets within the AONB is not accepted).

Yet despite those constraints, a number of windfall sites have come forward in the last 2 years alone, including some with affordable housing. On my estimate (from locally announced applications), some 24 dwellings have been or are expected to be approved on smaller sites within that period. A further 25, including elements of affordable and self-build housing, have been approved beyond the built up area, together with a 12 bed care home in the form of self-contained units (though permission yet to be issued). Permission is also anticipated for 2 further sites, one for 13 affordable units, the other for 22 dwellings, including 11 affordable units. A further proposal for 34 dwellings is expected to be refused but if so, may well be taken to appeal given the present lack of a 5 year supply etc. Even if only the rest proceed however, that gives a total of 84 dwellings, excluding the care home, of which about 30 will be in the affordable category plus a few self-build homes.

At the time of writing, we are still gathering evidence in support of the Neighbourhood Plan. We have carried out a ‘town survey’ including one on local housing needs. There is still work to do to assess the extent of it, not just in terms of numbers but of mix, type and affordability. Preliminary results however suggest we may already have sufficient provision to meet local needs. For example, as at November 2015, of the 153 people (but only 99 ‘with points’) on the Council’s waiting list who expressed a wish to live in Charlbury, only 20 were assessed as already having local connections.

That said, as a group, we recognise that if local needs justify it, then it would far better for the community to agree (through the NP referendum) on the allocation of land and type of housing to meet them than to have constant arguments over speculative windfall applications, many of which are designed simply to maximise the developer’s profit. No-one involved sees the NP process just as a means to prevent development.

But we are not yet at the stage of determining how much land will be needed or where new housing development would be best placed. It may be that the ‘Jefferson’s Piece’ land will not be needed – or at least not yet. There may also be other sites that would have less impact in landscape terms which for whatever
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| MM335        |                         | Sarah Routley  | -               | Routely           | 620        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 196 | I am objecting to the development on the following grounds.  
- access to the building site and development is via an effectively single lane road - ditchley road, it is narrow, with parked cars down one side and on the corner where it joins to the slade. This makes the junction risky currently and even more so with an increase in traffic volume  
- the green and Jefferson place is currently a busy housing estate, children play out on the estate and cycle, there are many parked cars which makes access for large vehicles impossible at times and very unsafe  
- the impact on the AOB and wildlife of such a development is considerable  
- the are better sites in Charlbury that could be accessed directly from a main road, such as rusty bank |
| MM337        |                         | Sharon Harris  | Mrs             | Harris            | 623        | > SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 196 | Subject; land off Jefferson Piece, Charlbury, proposed development of 40 homes  
planning ref main 194 and main 195  
I am writing in reference to the planning application regarding the proposed development .  
I live in 20 Jefferson piece across from the garages that is proposed to be the entrance to the site. Which I find is crazy to be used for what is proposed. This will take away the safety of our estate for our children that walk, run and bike around the estate that feel safe doing this but if we have traffic of 40 or more cars from home owners and visitors this will be gone. when you drive around the estate you will notice a problem already with the parking of cars, this is an issue as most homes have more then one car and cars are parked on the roads, some days cars from two streets away park cars out side my house due to parking issues. The dustcart even struggles most mornings and end up taking kirb stones out to driving on paths to turn. so what happens to our parking if the entrance ends up here. I have lived in the estate all my life and I know this will have a big impact on our estate. we do need to come up with a better solution to connect the field to a road that does not affect the areas struggling with problems to start allowing or children to stroll freely and happy in the estate made safe by the community of my neighbours. |
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<td>MM340</td>
<td></td>
<td>Simon Tibbitts</td>
<td>Mr</td>
<td>Tibbitts</td>
<td>641</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>why is the field next to the skate park by the development of Ticknell piece not being considered due to this would be a great place to consider a build like this of 40 homes and the roads would accomadate the traffic but there is still a issue of school places and with the houses that are going to be built in the next year, where are children going to go. I work in the primary school of charlbury and find local families that have lived in charlbury all their life upset when their children can’t get into the local school due to the volume. Please reject this planning proposal.</td>
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<tr>
<td>MM361</td>
<td></td>
<td>Yvonne Cubbage</td>
<td>-</td>
<td>Cubbage</td>
<td>674</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>I would like you to explain how the local primary school in Charlbury is supposed to cope with 40 new homes when the school is already so oversubscribed.</td>
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<tr>
<td>MM364</td>
<td></td>
<td>Rhian Jones</td>
<td>-</td>
<td>Jones</td>
<td>677</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>I am writing in reference to the above planning application regarding the proposed development of 40 houses at Jeffersons Piece Charlbury. I live on the Ditchley Road which is next to Elm Crescent and the proposed access to the site, I am writing to register my objection to the proposed development. This is a greenfield site within the Cotswold area of outstanding beauty and a conservation area. The field is home to a large number of wildlife. 40 more new homes on such a small site would have a huge impact on the environment and surrounding estate. This cold easily generate at least another 80 Vehicles travelling past my road which is already busy with Cars on the side of Ditchley Road let along the additional noise created. The primary school is already full and even current new comers are not able to gain admission and having to travel out of the town. – we already encourage walking to School. I appreciate the requirement to build new homes but this site is not appropriate in my opinion. I would ask that this proposal is rejected.</td>
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I moved to Charlbury and bought a house here over 8 years ago, I worked full time until I was 66 and retired two years ago. I live in Elm Crescent at No 8. I moved here for my work at Kidlington Airport and bought my house because it is an the Area of Outstanding Natural Beauty and in a conservation area. While I accept the need for additional housing everywhere not just in Charlbury, I object to the plans for the 40 house development in a green field site adjacent to Elm Crescent. My objection is two fold, first access to the site for future residents and construction traffic. Elm Crescent, Chartwell Drive and Ditchley Road all have parked cars on the street and the junction with the Slade is already difficult as things are, especially at school times. A covenant that came with my house states that the front gardens are not to be fenced in, that is open plan. Presently there are few children (that I know of) in Elm Crescent but that will change over time, with children... |
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<tr>
<td>MM375</td>
<td>Charlbury Town Council</td>
<td>Mr S R Clarke</td>
<td>Mr</td>
<td>Clarke</td>
<td>738</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>playing in a future feeder road with no fenced gardens. Already traffic speeds past my house, additional traffic in a road not designed to be a feeder road is not acceptable. I mean delivery and trade and emergency vehicles not just the additional 80 or so vehicles belonging to the new residents. Secondly as I understand it, local services, NHS and schools are already strained and any development plan must address these issues. Assuming that the schools and services issue was to be addressed and that access to the new site is not via the three roads I mentioned above it may be acceptable. Unfortunately looking at the map supplied it seems that there may be no other practical access route. So my objection to this development stands.</td>
</tr>
<tr>
<td>MM395</td>
<td>B Prewitt</td>
<td>Mr</td>
<td>Prewitt</td>
<td></td>
<td>856</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>We wish to raise two specific points of detail. 1. In the first sentence, Charlbury is incorrectly described as a village. 2. Specific recognition of the site's location in the Cotswolds AONB should be included (see also our comment on proposed modification MAIN 16).</td>
</tr>
<tr>
<td>MM424</td>
<td>Natural England</td>
<td>Mr</td>
<td>Turner</td>
<td></td>
<td>955</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 196</td>
<td>Further to the notification and the proposal to build 40 homes at this location. It will be of great interest to know exactly what West Oxfordshire District Council intend to do with regard to the infrastructure as it stands at present in Charlbury. This not being the only development in the area. I.e. school places, doctor's, policing, welfare and traffic mass.</td>
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<tr>
<td>MM768</td>
<td>Mrs Stevenson</td>
<td>Mrs Stevenson</td>
<td>Mrs</td>
<td>Stevenson</td>
<td>2010</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 197</td>
<td>Allocations in the Burford/Charlbury Sub Area (Land North of Woodstock Road Stonesfield, Land East of Burford, North of Jefferson Place Charlbury and South of Milton Road Shipton Under Wychwood). All these sites fall within the Cotswolds AONB. For all four sites the Sustainability Appraisal states that there has been no landscape assessment and a major negative long term effect is anticipated. A landscape assessment needs to be undertaken to inform the selection of site allocations before these sites can be considered for inclusion in the Local Plan.</td>
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<td>These representations are submitted in response to the West Oxfordshire Local Plan 2031 – Proposed Modifications Consultation, December 2016 (WOLP 2031 Modifications). They are made by Edgars Limited on behalf of Mrs Stevenson who has land under her control South of Milton Road, Shipton under Wychwood. Mrs Stevenson supports Main Modifications 197 to 199, Policy BC1d and the proposed allocation Land south of Milton Road, Shipton under Wychwood for about 44 homes. Mrs Stevenson confirms that the site is suitable, available and achievable and has submitted an outline planning application (Ref 16/02851/OUT) for up to 44 homes and additional parking for the adjoining primary school. The planning application, proposed site layout and associated documentation demonstrate that 44 dwellings is deliverable on the site in accordance with the proposed Policy BC1d. The dwellings can be delivered in the period 2016-2021 Mrs Stevenson agrees with the Council that the site's location within the AONB and Conservation Area does not preclude the development of the site. This is in part due to the recognition that as the Burford –</td>
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<td>MM32</td>
<td></td>
<td>Graham Cobb</td>
<td>Mr</td>
<td>Cobb</td>
<td>68</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 197</td>
<td>I support the development of additional housing in this location, and for the school car parking, however I believe that 44 homes are far too many for the space, and for the village. The required level of density would be more like a town centre, than a rural village location. The nearby estate is at a lower density and the other housing nearby is mostly large detached houses. In addition, the village facilities are limited, with one small shop and an already busy primary school and very limited public transport. The plan does not seem to say how the needs of the additional residents will be met, particularly in the light of the large development planned in Milton-Under-Wychwood. There is also a concern that the western part of the proposed site almost reaches the buildings around Milton Service Station and development of that part of the site would have the effect of joining the two villages (Shipton and Milton) into a single developed area. The two villages have different characters and there would be very substantial impact on both if they were to become perceived as a single developed area. That would then result in much development pressure on the current gap between the villages creating a very large and very different style of village and completely losing the current rural character of both.</td>
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<td>MM768</td>
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<td>Mrs Stevenson</td>
<td>Mrs</td>
<td>Stevenson</td>
<td>2011</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 198</td>
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<td>MM451</td>
<td>English Heritage</td>
<td>Historic England</td>
<td>Mr</td>
<td>Small</td>
<td>1100</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 199</td>
<td>As at December 2016, the planning application as due to be reported to the Council’s Planning Committee with an officer recommendation of approval. It is hoped that the Council will have resolved to approve the application in advance of the recommencement of the WOLP 2031 Examination in 2017. Mrs Stevenson, however, wishes to reserve her position to be represented at the examination, if required, in relation to Main Modifications 197 to 199, Policy BC1d and the proposed allocation Land South of Milton Road, Shipton under Wychwood.</td>
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<td>MM479</td>
<td>Dr KWGray</td>
<td>Dr Gray</td>
<td>Dr</td>
<td>Gray</td>
<td>1205</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 199</td>
<td>This site is within the Shipton-under-Wychwood Conservation Area. Unfortunately there does not appear to be a Conservation Area Character Appraisal on the Council’s website, so without specifically undertaking our own assessment it is difficult to ascertain how valuable a contribution this site in its undeveloped state makes to the special interest, character and appearance of the Conservation Area. However, from our knowledge of the site and the considerations in proposed paragraph 9.6.35c, we consider that its development might be acceptable, if undertaken sensitively.</td>
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<tr>
<td>MM768</td>
<td>Mrs Stevenson</td>
<td>Mrs Stevenson</td>
<td>Mrs</td>
<td>Stevenson</td>
<td>2012</td>
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This indeed was the established position in a recent appeal allowed on land south of High Street, Milton under Wychwood (Appeal Ref APP/D3125/W/16/3143885) where the Inspector concluded that major development in the AONB was in the public interest to address the housing needs of the area and there was no scope to meet these needs outside of the AONB

As at December 2016, the planning application as due to be reported to the Council’s Planning Committee with an officer recommendation of approval. It is hoped that the Council will have resolved to approve the application in advance of the recommencement of the WOLP 2031 Examination in 2017. Mrs Stevenson, however, wishes to reserve her position to be represented at the examination, if required, in relation to Main Modifications 197 to 199, Policy BC1d and the proposed allocation Land South of Milton Road, Shipton under Wychwood.

Ecology and Natural Environment

In all cases reference should be made to the District Council’s ecologist for specific details on each site. It is assumed that before firm proposals are brought forward for each site an appropriate ecological, landscape and visual impact assessment will be undertaken including surveys for protected and threatened species.

The permanent loss of land of existing and potential future habitat value should be recognised with a corresponding investment in biodiversity and other green infrastructure resources that provide a range of benefits including biodiversity, water management and contribute to physical and mental well-being. Additional off-site enhancement should be provided where insufficient environmental gains cannot be secured within the development boundary.

Shipton under Wychwood – Land South of Milton Road

The site lies within the Cotswolds AONB.

The adjacent streams are of biodiversity value and provide opportunities for natural water management.

There will be increased demand on the local green infrastructure resources – pocket parks etc, and further investment in such facilities may be required. Wychwood Wild Garden, a locally owned woodland garden, lies to the south. Further investment in this site will be required to improve its future resilience.

There may be opportunities to contribute to the aims of Cotswolds Valleys Nature Improvement Area within which the site lies.

b) provision of satisfactory vehicular access and appropriate pedestrian and cycle connections.
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<tbody>
<tr>
<td>MM32</td>
<td>Charlbury Sub Area &gt; MAIN 199</td>
<td>Graham Cobb</td>
<td>Mr</td>
<td>Cobb</td>
<td>69</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 199</td>
<td>I support the development of additional housing in this location, and for the school car parking, however I believe that 44 homes are far too many for the space, and for the village. The required level of density would be more like a town centre, than a rural village location. The nearby estate is at a lower density and the other housing nearby is mostly large detached houses. In addition, the village facilities are limited, with one small shop and an already busy primary school and very limited public transport. The plan does not seem to say how the needs of the additional residents will be met, particularly in the light of the large development planned in Milton-Under-Wychwood. There is also a concern that the western part of the proposed site almost reaches the buildings around Milton Service Station and development of that part of the site would have the effect of joining the two villages (Shipton and Milton) into a single developed area. The two villages have different characters and there would be very substantial impact on both if they were to become perceived as a single developed area. That would then result in much development pressure on the agricultural land to both the north and south of Milton Road which forms the current gap between the villages creating a very large and very different style of village and completely losing the current rural character of both.</td>
</tr>
<tr>
<td>MM412</td>
<td>Shipton under Wychwood Parish Council</td>
<td>Shipton under Wychwood Parish Council</td>
<td>Ms</td>
<td>Wilkinson</td>
<td>914</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 199</td>
<td>The Parish Council notes that 44 houses off Milton Road have been factored into the Draft Plan. This is the subject of a current planning application and the Parish Council considers this to be grossly prejudicial to the outcome of its objection to the application. Assurances have been received that this is not the case but the logic of this position is unclear. The Parish Council believes that inadequate consideration has been given to infrastructure and safety issues in relation to the 44 Houses. It notes that no further sites are earmarked for development within the planning period.</td>
</tr>
<tr>
<td>MM424</td>
<td>Natural England</td>
<td>Marc Turner</td>
<td>Mr</td>
<td>Turner</td>
<td>956</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 199</td>
<td>Allocations in the Burford/Charlbury Sub Area (Land North of Woodstock Road Stonesfield, Land East of Burford, North of Jefferson Place Charlbury and South of Milton Road Shipton Under Wychwood). All these sites fall within the Cotswolds AONB. For all four sites the Sustainability Appraisal states that there has been no landscape assessment and a major negative long term effect is anticipated. A landscape assessment needs to be undertaken to inform the selection of site allocations before these sites can be considered for inclusion in the Local Plan.</td>
</tr>
<tr>
<td>MM425</td>
<td>Carterton Construction</td>
<td>Carterton Construction</td>
<td>-</td>
<td>Carterton Construction</td>
<td>1000</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 200</td>
<td>2.85 The proposed strategy for the sub-area has been updated to reflect the allocations of the non-strategic sites now proposed in the sub-area. We do not repeat our comments regarding the Council’s proposed housing target and supply here, but as discussed it is considered that further allocations are required in order to meet the Council’s housing target and to ensure the flexibility required by the NPPF is allowed for. 2.86 In addition to the delivery of housing, the sub-area strategy sets out aspirations in respect of protecting the natural environment, in particular the AONB, enhancing transport opportunities, supporting employment opportunities including sustainable tourism and retaining and enhancing local services and community facilities. 2.87 It is considered by our client that the allocation of its wider land interests would provide a range of benefits to meet the aspirations for the Sub-Area and the District as a whole.</td>
</tr>
</tbody>
</table>
2.88 Whilst it is acknowledged that development of the wider site would encroach further into the AONB, the accompanying Vision Document summarises the technical assessments of the proposals which have been undertaken to date which demonstrate that the site represents a suitable and appropriate location to accommodate future growth. The analysis of the site and subsequent development framework in the Vision Document clearly illustrate how a sensitive, high quality development which responds to the attributes of the site can be achieved. In summary, the development framework has concluded the following:

- **Policy Context** – The western field parcel of the site is proposed for allocation in the Proposed Modifications to the Local Plan under Policy BC1b for 85 homes. Allocation of the wider site will enable a number of wider benefits to be delivered including a new community medical centre and coach and car park. Development of the site will also support the five year supply and contribute towards the delivery of the Council’s wider economic growth strategy and the creation of sustainable communities.

- **Towcape and context** – The site represents a development opportunity close to both the historic core of the town but also in close proximity to a range of services and amenities. It is well contained and represents a very suitable and sensitive opportunity for new housing in line with sustainable growth patterns.

- **Access** – The site benefits from good local and regional road links, benefits from regular bus connections to local centres and is in walking distance of a host of local services which helps promote sustainable movement patterns.

- **The site** – The future development of the site can be delivered whilst retaining and enhancing its specific landscape and ecological attributes. New areas of public open space can also be delivered through the release of the land for residential development.

2.89 It is considered that development of the wider site would result in range of benefits and we assess the proposals against the Sustainability Appraisal Objectives below. (ATTACHED)
2.90 In light of the above, it is considered that the proposed site to the east of Burford should be extended to reflect our client’s wider land interests in order to deliver the increased benefits outlined above. This would also help in addressing our earlier concerns in respect of meeting the District’s housing target and result in further improvements to the function and role of Burford in the sub-area.

MM376  
Stagecoach in Oxfordshire/Stagecoach West  
Nick Small, Stagecoach Bus  
Dr Small  
1027  
> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 200  
MAIN 200 Policy BC1 Burford-Charlbury Sub-area Strategy

Stagecoach broadly supports the Sub-area Strategy and Policy, recognising the high level of environmental constraint and the relatively limited opportunities available to meet local travel demands by sustainable modes in a very rural area.

Stagecoach notes that some draft allocations are proposed in settlements where regular bus services are not provided, though some such as Shipton- and Milton-under-Wychwood can take advantage of rail services for some longer journeys. Most such allocations in fact represent development already committed. Stagecoach is concerned that larger-scale development in these settlements is strongly resisted, as being inherently car-dependent; and this is most likely to be achieved through the adoption of the Plan.

Land north of Jefferson’s Piece, Charlbury (40 homes)

Stagecoach recognises and supports the need to make suitable allocations to meet locally-arising housing need in the Charlbury area. Among other services and facilities, Charlbury benefits from existing hourly commercial bus services offered by Stagecoach service S3, as well as a nearby rail station with regular stopping services. Thus, this settlement represents by far one of the best locations to seek to make such an allocation within the Sub-area.

MM729  
R A Cutler  
Mr Cutler  
1687  
> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 200  
We are aware that paragraphs 115 and 116 of the NPPF attach great weight to conserving landscape and scenic beauty in Areas of Outstanding National Beauty, where major development should be refused except in exceptional circumstances. Given the constraints imposed by the AONB, we question whether any housing allocations in the AONB settlements is possible at this late stage of the plan.

We suggest that the approach to plan-led development in West Oxfordshire’s AONB settlements such as Charlbury needs to be careful and considered, perhaps following the approach taken by local planning authorities such as Winchester, Horsham and North Kesteven where a plan-wide allocation for certain, smaller scale settlements is set, with development coming forward either (a) as part of a Neighbourhood Plan or other locally supported initiatives, such as a Planning Brief, or (b) by means of a planning application that is supported at the local/Parish level. This approach has been tested at EIP/hearings recently, and held to be sound.

MM734  
vanderbilt Homes  
Vanderbilt Homes  
-  
1708  
> SECTION 9 - STRATEGY AT THE LOCAL LEVEL > Burford Charlbury Sub Area > MAIN 200  
Object MAIN 200 - Policy BC1 - the 4 non-strategic allocations

The Burford Charlbury Sub-Area

The housing allocation for the Burford-Charlbury sub-area has increased from 800 to 1,000 over the plan period.

Para 9.6.34a states that “in order to help meet identified housing needs four non-strategic site allocations are proposed in the Burford - Charlbury sub-area.” In total 219 homes are envisaged on these allocated non-strategic sites, over 20% of the total for the sub-area.

We note that paragraph 4.38 of the Sustainability Appraisal (SA) states that “each potential non-strategic site allocation was subject to detailed SA (Appendix V) and no major significant
negative effects were identified." However, the scope of this assessment is a series of high-level comments against the 15 SA objectives.

Whilst this is an entirely appropriate starting point, given the sensitivity of these sites - within the AONB and 3 within Conservation Areas - it is considered that further detailed assessment is required.

Carefully planned development in suitable locations is an appropriate means of meeting the identified housing need. The Council acknowledge this at para. 9.6.34g stating that "in terms of the scope for developing elsewhere, the Burford - Charlbury sub-area is washed over by a significant proportion of AONB designation. This in itself means that to meet future housing requirements, some development within the AONB will be necessary". We agree with this sentiment.

However, we are of the view that further examination of the sites is required. The allocated sites would benefit from the development of detailed indicative plans, capacity studies, and a consultant team assessing the impacts of the development on the CAONB, on designated heritage assets, on the highway network etc. For example, the proposed allocation of land north of Jefferson's Piece in Charlbury clearly has vehicular access issues which may affect deliverability and/or the number of units that can be achieved.

Paragraph 4.83 of the SA states acknowledges there is "uncertainty in the longer-term and until further detailed project level studies have been completed."

It is therefore far from certain whether these sites offer a realistic possibility of delivering the specified level of housing in the Plan period. For example the proposed allocation of land north of Woodstock Road, Stonesfield simply may not materialise as there is no developer interest, while the proposed allocation at Milton Road, Shipton-under-Wychwood is the subject of significant local objections to its planning application.

It is unreasonable to simply assume these sites are deliverable by virtue of their inclusion as a main modification, and to proceed to use that as a basis to develop housing policies which seek to demonstrate a 5 year housing land supply.

Noting the constraints discussed within the Plan from paragraph 9.6.1 onwards, the Plan states that 283 homes will be delivered through windfall sites within the sub-area. Taken together with the four draft non-strategic allocations, this is a total of 502 homes (or 50% of the sub area's total indicative housing requirement).

Whilst making an allowance for windfall sites is an accepted means of predicting housing delivery over the Plan period, we are of the view that to rely on speculative development and draft allocated sites (which are the subject of ongoing consultation and examination) to the degree the Council have done is unsound.

Our recommendation is that the Plan should identify additional sites in order to reduce the reliance on windfall development to meet the housing requirement for the sub-area.

Proposed change MAIN 187 & MAIN 200 - the 'land south of Grammar School Hill' site is included as a non-
Vanderbilt Homes have submitted an outline application at Land South of Grammar School Hill, Charlbury. The site is identified in red on the appended plan.

The outline application was submitted following detailed development of the proposals, with full assessment of the impacts of the development from heritage experts, landscape consultants, and transport consultants.

This level of detailed development of indicative proposals - including an examination of the capacity of site and the impact of the development - has not been undertaken in respect of other draft allocated sites in the Plan.

As discussed above, the proposed site allocations are at an early stage and will undergo further consultation and examination. There will be unresolved objections to these sites, and the Inspector may require further proposed modifications to be made.

Footnote 11 of paragraph 47 of the NPPF states how "to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable."

The application for up to 34 homes at Land South of Grammar School Hill Charlbury represents a carefully considered, sustainable, and deliverable site that would contribute towards the housing requirement for the sub-area. It is available now, achievable within the short term, and offers a realistic prospect of housing above that which is currently being considered by the Main Modifications to the Council's Local Plan.

We consider this site should be one of these additional allocated sites. It is available, and deliverable in the short term. It will contribute towards reducing reliance on windfall development in the Burford-Charlbury sub-area, providing an element of certainty in respect of tangible, tested, and deliverable sites.

In order to assist towards making MAIN 200 is sound, we therefore recommend that the site at 'land south of Grammar School Hill, Charlbury' (as identified in red on the attached plan) is included in the emerging Plan as a non-strategic allocated site.

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Policy BCI (MM200) should be amended to refer to the delivery of 800 homes in the plan period and to reflect the deletion of the proposed allocations within the AONB at Stonesfield, Burford, Charlbury and Shipton-under-Wychwood.

Policy BCI (MM200) should be amended to refer to the delivery of 800 homes in the plan period and to reflect the deletion of the proposed allocations within the AONB at Stonesfield, Burford, Charlbury and Shipton-under-Wychwood.
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<td>MM24</td>
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<td>Southern</td>
<td>Respondent</td>
<td></td>
<td>39</td>
<td>LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 200</td>
<td>The plan for 85 houses to be built in the local plan 2031 in Burford, within the Town, within the Cotswold Area of Outstanding Natural Beauty, and within the Conservation area is not legally compliant as it conflicts with West Oxfordshire Statement of Community Involvement (July 2014) Section 2.4 Preparation of a local plan (Regulation 18), Stakeholder Involvement “to involve stakeholders in the plan during preparation”. This plan BC1b for 85 houses in east Burford has been added during the revision to the original plan submitted in 2015. There has been adequate time allowed during the amendment stage to consult as required in WODC’s Statement of Community Involvement, especially as the inspector has allowed West Oxfordshire District Council additional time over and above the prescribed 6 months to submit their revised plan. Burford Town Council is a stakeholder in Burford: they were not consulted during the plan preparation.</td>
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<td>MM24</td>
<td></td>
<td>Peter Higgs</td>
<td>Mr</td>
<td>Higgs</td>
<td>40</td>
<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 200</td>
<td>The revision of the original plan is being carried out to support the need for additional housing for Oxford City, and to increase the housing need from 525 a year to 660, as the inspector has pointed out, to meet the SMHA requirement. It seems logical to ensure the some of the extra housing added in the revision will help serve the requirement for Oxford City sustainably, with good transport links to the city. Plan BC1c is for the addition of 40 houses in Charlbury. Charlbury is a town of just under 3000 population, with 1298 households in the 2011 census, and with a fast, efficient rail connection to Oxford City taking 18 minutes and planned to run roughly every hour from December 2018. This proposal would increase the households in Charlbury by about 3%. Plan BC1b is for the addition of 85 houses in Burford. Burford is a town of just about 1300 population. There are no local bus services from Burford direct to Oxford. This is pointed out in the revised plan in paragraphs 9.6.12 and 9.6.13 as follows</td>
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<td>&gt; SECTION 9 - STRATEGY AT THE LOCAL LEVEL &gt; Burford Charlbury Sub Area &gt; MAIN 200</td>
<td>9.6.12 This sub-area is the best served in terms of rail services with the Cotswold line running along the Evenlode Valley and passenger stations at Kingham, Shipton under Wychwood, Ascott under Wychwood, Charlbury and Finstock. In their Local Transport Plan (LTP4) Oxfordshire County Council identify the Cotswold line as a strategic priority including further capacity and service enhancements, Charlbury is identified as the busiest station on the line with passenger numbers up 30% since 2002. The strategy identifies the potential for further growth with the introduction of an hourly service in December 2018. It identifies a number of specific improvements to Hanborough Station and more general improvements along the rest of the line include further redoubling at the eastern and western ends of the line, ensuring appropriate levels of car</td>
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parking are available and improving bus and cycle links to encourage multi-modal travel.

*9.6.13 The availability and frequency of bus services is variable. Services through Charlbury are good, with hourly direct services to Woodstock, Oxford, Witney and Chipping Norton. Bus services in Burford are less well developed, although there is a service to Woodstock via Witney and Long Hanborough Station.

By adding 85 houses to Burford, which in the 2011 census had 665 households, and which already has an oversubscribed Primary School, a failing sewerage system, and a lack of parking, and siting these houses where there is no public transport does not appear sustainable. This is over 4 times the percentage increase in households that is planned for Charlbury, and would increase the households in Burford by about 13%.

Whilst I support the inspectors requirement for an additional 660 houses per year in West Oxfordshire in the plan period, I believe they should be allocated proportionally within the Charlbury - Burford sub area. Looking at the allocation to Charlbury, Shipton-under-Wychwood, and Stonesfield all of which have populations equal or greater than Burford, and all of which have an additional 40-50 houses, I question why West Oxfordshire have proposed 85 houses in Burford.

Plan BC1b does not serve the need identified by the inspector to provide sustainable housing. If built, many will just become second homes.
### APPENDICES

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<tr>
<td>MM761</td>
<td></td>
<td>R Jonas</td>
<td>Mr</td>
<td>Jonas</td>
<td>1974</td>
<td>&gt; APPENDIX 2 &gt; MAIN 201</td>
<td>Appendix 2 to the Local Plan sets out the Council's proposed housing trajectory. We question whether the forecast housing trajectory, which predicts a significant increase in delivery from an average of 293 dwellings per annum between 2011/12 and 2015/16, to an average of 903 units per annum between 2016/17 and 2020/21 is realistic and deliverable, with the sites put forward in the Submission Draft Local Plan (including the Proposed Main Modifications). The Council's strategy, which continues to place significant emphasis on strategic sites, is considered to be 'high risk'. The strategic sites have lead-in delivery time of many years, taking account of preparation of S106 agreements, discharge of conditions, and provision of appropriate infrastructure. The progress made with West Witney is a case in point. As above, we would strongly encourage West Oxfordshire District Council to propose the allocation of additional sites at the villages within the Districts, to support delivery of the housing trajectory. We would further suggest that the Council needs to monitor its housing delivery regularly, and publish its findings on its five year housing land supply, so that planning applications can be made on those sites adjoining villages that have not been allocated, to assist in meeting identified housing need.</td>
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<tr>
<td>MM25</td>
<td>CPRE</td>
<td>Gareth Hammond</td>
<td>Mr</td>
<td>Hammond</td>
<td>49</td>
<td>&gt; APPENDIX 2 &gt; MAIN 201</td>
<td>These inflated targets are way beyond anything achieved in the past. Yet if the targets are not met, we will continue to be vulnerable to speculative inappropriate building. Where is the reality check?</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>203</td>
<td>&gt; APPENDIX 3 &gt; MAIN 213</td>
<td>Appendix 3, Policy T2: Again, where will this ‘northern link road’ for the Garden Village go?</td>
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<tr>
<td>MM61</td>
<td>NP</td>
<td>Mr</td>
<td>Pearce</td>
<td>587</td>
<td>&gt; APPENDIX 3 &gt; MAIN 213</td>
<td>MAIN 213, Appendix 3, Policy T2 Not sound Again, where will this ‘northern link road’ for the Garden Village go?</td>
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<td>MM332</td>
<td>Ms Couch</td>
<td>Ms</td>
<td>Couch</td>
<td>638</td>
<td>&gt; APPENDIX 3 &gt; MAIN 213</td>
<td>Policy T2 – Highway Improvement Schemes ‘Development proposals that are likely to generate significant amounts of traffic, shall be supported by a Transport Assessment (TA) and a Travel Plan. Where necessary to mitigate the impact of development and support planned growth, contributions will be sought from new development towards new and/or enhanced highway infrastructure either directly as of the development or in the form of an appropriate financial contribution.’ I support the requirement for travel plans, but there WILL be an impact on transport and it will be essential that all major developments including SDAs contribute to the whole transport infrastructure as part of a co-ordinated plan. Responsibility needs to be shared by OCC and WODC.</td>
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<tr>
<td>MM457</td>
<td>North Witney Action Group</td>
<td>Mr</td>
<td>Neyroud</td>
<td>1152</td>
<td>&gt; APPENDIX 3 &gt; MAIN 217</td>
<td>The current estimated infrastructure costs required to build North Witney SDA according to a note received in Nov 2016 from WODC's Planning Policy Manager are –</td>
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Respondent ID
 NWAG

Respondent Name
 Helen CPRE Oxon

Respondent Title
 Mrs Marshall

Comment (plain text)

- Northern Perimeter Road £6m
- West End Link Road £23.2m
- Foul Water Drainage Improvements £3m
- Flood Alleviation £3m
- Highway Improvements £4m

£39.2m

The North Witney SDA (incl West End Link) requires extraordinarily expensive infrastructure - “Due to the complexity of the site....” (Main 217)

At £39.2m, this is a wasteful use of considerable infrastructure funds, with other rejected SDA's in West Oxfordshire either much better located, in greater need of housing, or both.
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<td>MM784</td>
<td>North Witney Land</td>
<td>North Witney</td>
<td>2174</td>
<td>&gt; APPENDIX 3</td>
<td>This demonstrates a lack of joined-up thinking by WODC as well as non-cooperation with OCC in its endeavour to raise the £55m for the county’s much needed A40 improvements (including a full 4-way junction at Shores Green). These would be of major benefit to Witney residents not only in their commute to and from Oxford, but also locally. Firstly as recognising the A40 between Shores Green, Ducklington and Down’s Road junctions as the ‘Witney by-pass’ between east, south and west housing areas (avoiding the Town centre and the critical AQMA of Bridge St), and secondly as a recognition of the west and south sides of Witney as the main areas of employment.</td>
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<tr>
<td></td>
<td>Land Consortium</td>
<td>Land Consortium</td>
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<td>&gt; MAIN 217</td>
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<tr>
<td>MM315</td>
<td>Richard Gwinn</td>
<td>Gwinn</td>
<td>581</td>
<td>&gt; APPENDIX 3</td>
<td>In terms of the Local Plan Delivery and Monitoring Framework for Policy WIT2, the proposed modification under the ‘Timescale &amp; Comment’ column states that: “Due to the complexity of the site and lead-in times for large strategic sites it has been assumed that the site will come forward after 2021”. However the modification above fails to reflect the Council’s comment at paragraph 9.2.48 of the Local Plan which acknowledges that the land between New Yatt Road and Woodstock Road could provide up to 200 units as a first phase of development in the shorter term. The Delivery and Monitoring Framework in Appendix 3 of the Local Plan should therefore be revised accordingly.</td>
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<td>&gt; MAIN 226</td>
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This modification increases significantly the number of properties to be built in the Chipping Norton SDA. This is backed up by unsound evidence and is not appropriate to the existing community. In particular:

a) Part of the Vision in section 3.2 is to “play a role in helping to meet wider needs, without significant change to the intrinsic character of the District.” Increasing the population of the town by 50% will inevitably change its character. Especially as the driver for the increase is the need to house those working in Oxford, so turning a working town into a dormitory town.

b) Core Objective CO2 is to “Ensure that new developments are suitably located and well designed to protect and enhance the individual form, character and identity of our towns and villages as well as contributing to the quality of life in West Oxfordshire.” This fails for the same reasons as the Vision statement.

c) Core Objective CO3 is to “Promote safe, vibrant and prosperous town and village centres and resist proposals that would damage their vitality and viability or adversely affect measures to improve those centres.” Whilst a modest increase in population will help the town, this huge increase, aimed at commuters into Oxford, will be detrimental. The plan mentions that the proposed development is within walking and cycling distance of the town centre, although it offers no evidence to support this. I visit the town centre most days and have never seen more than one bicycle in the cycle parking there. The area around the town is too hilly for most of the population to cycle. A straw poll of people living in the Parkers Circus estate (which is closer to the town centre than is the SDA) indicates that none walk when going into town to do their shopping. These were all fit, active people. The town centre is also not safe. In the last few years, people have been killed by passing traffic while on the pavement at Horsefair. The proposed link road appears to be a “road to nowhere” as the majority of traffic (especially commercial traffic) enters or leaves the town on the A44 Moreton-in-Marsh road. This will become even more the case if a weight restriction is put on the ancient bridge in Burford, as has been suggested. In that event, no heavy vehicles will use this relief road. This increase in traffic will also affect air quality, which is already at illegal levels.

d) Core Objective CO4 is to “Locate new residential development where it will best help to meet local housing needs and reduce the need to travel.” Policy T1 – Sustainable Transport says that “Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where
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| MM779         |                         | Sarah Franks    | Ms Franks        | 2118               | > APPENDIX 3 | > MAIN 232        | the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton. The need for severely reduced transport impact, particularly on the Air Quality Management Area of Chipping Norton and Witney. The increase proposed in the modification is mainly to serve Oxford. There is no train link to Oxford. The bus to Oxford takes over an hour and is infrequent. The bus service from Kingham Station does not wait if a train is delayed, resulting in a possible two-hour wait for the bus that meets the next train. I see no solution to this problem as buses have to keep to timetables. Everyone I know has stopped using this bus, resulting in more car journeys and a station car park that can't cope. The alternative is to travel to the station by driving through country lanes and the village of Churchill in contravention of Policy T1. The increased local traffic will make air quality worse. There is nothing in the proposed plan to solve these problems.

e) The proposed plan states in para 7.74 that "In Chipping Norton public car parking spaces in the town centre are insufficient to meet current needs." There is nothing in the proposed plan to solve this problem. |

Introduction

This site is one of three medium to large housing development sites around Woodstock that are being put forward as main modifications to the draft submission of the West Oxfordshire Local Plan 2031 (the Plan). These changes are proposed in response to issues raised by the Local Plan Inspector, Simon Emerson, who suspended the Local Plan Examination on 25th January 2016. He had expressed concerns about the robustness of the Plan to meet housing demand partly in terms of the overall number of new housing units proposed to be provided during the Plan period to meet the needs of the area covered by West Oxfordshire District Council (WODC) and partly in terms of the failure of the Plan to make provision for the unmet needs of Oxford City. Consequently a range of new housing sites across the District are now proposed to supplement those sites that were already allocated for new housing in the Plan.

The Soundness of the Plan

The consultation invites comments on the legality and soundness of the Plan. The comments provided within this consultation response deal solely with the soundness of the Plan in terms of the inclusion of the MAIN 232 site for housing.

The soundness of a Local Plan has been the subject of research by the Planning Advisory Service and others and a number of criteria have been used to assess soundness. These are whether the Plan is positively prepared, justified, effective and consistent with national policy. The comments provided within this consultation response relate mainly to the justification for choosing to allocate this potential housing site and whether the allocation is consistent with national policy. In terms of assessing justification and compliance with national policy, regard has been had to whether the decision to allocate this site is backed up by research and conclusions that indicate the appropriateness of the site in terms of issues that are of material planning importance, whether the site is one that is favourable in terms of proportionate evidence compared to available alternatives and how the allocation can be concluded as being a sustainable proposal when considered against the sustainability criteria set out in the National Planning Policy Framework (NPPF).

Comments in relation to the whole site (MAIN 232)

This large site is referred to as MAIN 232 and comprises land to the north of Banbury Road, Woodstock upon which it is anticipated that 250 houses could be provided by 2031. It is a combined site of three separate sites:

- The "Oxford" site
- The "Woodstock" site
- The "Kingham" site

The development of this site would require significant improvements to the existing infrastructure, including road and public transport connections. The developer would also need to address the likely increase in traffic and air pollution, which could have a negative impact on the local environment and quality of life in the surrounding areas. The Plan should ensure that sufficient provision is made for traffic management and environmental mitigation measures to address these concerns. Additionally, the Plan should consider the potential for social and economic benefits from the development, such as job creation and increased property values, as well as any potential adverse impacts on local businesses and residents.

The Plan should also address the issue of public access to the site, ensuring that the development does not result in a loss of open space or access to local amenities. The Plan should promote sustainable development practices, such as the provision of green spaces, energy-efficient buildings, and the use of renewable energy sources, to minimize the environmental impact of the development.

In conclusion, the Plan should provide a balanced approach to the development of this site, taking into account the potential benefits and concerns associated with the proposed development. The Plan should ensure that the development is carried out in a manner that is consistent with national policy and guidelines, and that it contributes positively to the local community.
parcels of land that are themselves individually referenced in the WODC document 'Strategic Housing and Economic Land Availability Assessment' (SHEEAL) as sites 360 (land north of Banbury Road), 361 (Green Lane, Woodstock) and 366 (Land East of Owen Mumford). These sites have areas of 6.37ha, 3.17ha and 7.38ha respectively, totaling 16.92ha for the whole of the MAIN 232 site. Sites 360 and 366 are essentially the two southerly portions of a much larger arable field, whereas site 361 is a much smaller and separate pasture, forming only 18.7% of the total MAIN 232 site. The site is believed to be within a single ownership of Blenheim Estates and has come forward as a potential site as a result of the land owner's intention to include the land as an allocated development site within the draft WODC Local Plan 2031.

In terms of the wider MAIN 232 site, as detailed above, it would be remote from the historic core of Woodstock. Although a minor access point could be achieved through a gap in buildings along Green Lane, this could only be a secondary access and the main access would be off Banbury Road towards the edge of the built up area. This is some distance from the centre of Woodstock and the distance to the locations of dwellings within the new development would probably be at least twice the distance from the centre of Woodstock to the access road. Given the degree to which people are able to use walking or cycling as a means of travel is wholly in proportion to the distance covered, it follows that the ability of any new residents to access the goods and services provided within the town of Woodstock would therefore be severely hampered due to the overall distance involved. The bus service along Banbury Road is limited and an extension of the service into a development of 250 houses would be unviable and extremely unlikely.

The inevitable conclusion is that the overwhelming number of households would be effectively limited to the private car, certainly as a means of accessing the goods and services within Woodstock and most likely for trips to destinations further afield as well. Given the dependence upon the private car, the development would effectively be a remote satellite to Woodstock, adding to congestion on Banbury Rod, reducing air quality and road safety, leaving non-drivers less able to access goods services, employment and other opportunities and therefore failing to adhere to the principles of sustainable development and would not result in the creation of sustainable communities in line with government policy. The NPPF seeks to encourage solutions which support reductions in greenhouse gas emissions and congestion (paragraph 29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport (paragraph 30). The inclusion of this site would run counter to those fundamental guiding principles.

The wider MAIN 232 site also lies in the middle of an important view cone for Blenheim Palace, a World Heritage Site across Woodstock and there is no argument for allowing any impact upon the landscape setting of this nationally important Heritage Asset. The open and rolling nature of the landscape is described in WODC’s own Landscape Character Assessment as an area characterised as ‘semi-enclosed limestone wolds’. This type of landscape is particularly sensitive to new development and in the absence of significant existing natural vegetation or landscape or other topographical features, the land is simply not capable of absorbing new development in a way that preserves it landscape qualities. Therefore, given the open undulating character of the land and its contribution to the setting of such an important heritage asset it would seem difficult, if not impossible, to justify the level of harm that would occur in order to provide this number of houses that could equally be provided elsewhere around the town, or not at all. That planning balance is further swayed towards the deletion of MAIN 232 having regard to the conclusions on transport and sustainability set out above.

Those landscape qualities and the appreciation of the setting of Blenheim Palace are available to the public from a number of vantage points within the area and the open wold landscape qualities particularly from footpath 413/7 that crosses the site. It is those views from that footpath that would be most affected. It is a public right of way in constant use by locals and tourists alike and the attractiveness of the views of the open...
limestone wolds would be entirely eliminated with the addition of a 250 dwelling housing estate surrounding the footpath.

The wider implications for infrastructure are already acknowledged in the draft Plan and the ability of the town to provide sufficient school places has been highlighted. In the absence of sufficient school places to warrant and provide for a new school, the traffic and air quality issues identified above will be exacerbated as parents struggle with car based school runs on an inadequate road network, particularly where those journeys involve the use of Hensington Road and its junction with Oxford Street.

Specific comments relating to plot 361 – Green Lane Woodstock

This is a green pasture lying between Green Lane and Banbury Road to the south of the MAIN 232 allocation site. It directly borders properties in Green Lane to the west and Kerwood Close, Banbury Road, The Quadrangle and Ramillies Close to the south. There are a number of significant constraints associated with this site including residential amenity, impact upon the setting of a listed building, trees and ecology and the ability to achieve a comprehensive development. These are examined below.

Residential amenity

The unusual aspect of plot 361 is the number of adjoining residential properties that have very shallow back gardens or no back garden at all. The properties along the eastern side of Green Lane have their gardens to the side and the rear façade of the properties are nearly up against the boundary of the field with the housing plot boundary being drawn along the field boundary. The properties at the northern end of Kerwood Close and those adjacent on the eastern side have extremely short rear gardens that are shallower than the depth of the houses themselves. The building at the northern end of The Quadrangle has recently changed use to form a residential dwelling and a portion of the paddock the rear has now been fenced off to provide a private garden for the occupants. However the boundary of the housing allocation is drawn tightly up against the rear boundary of the building and would divorce the private garden from the house leaving it with no private amenity space at all. The row of cottages along the Banbury Road immediately to the east of Hensington Farmhouse have extremely small rear gardens as do all of the properties in Ramillies Close.

The windows from the backs of all of these houses, over 25 dwellings in total, have a variety of standard rear windows that look out directly over the wider plot 361 area and the two parcels of land either side of the rear garden of Hensington Farmhouse. This will mean that the areas immediately adjacent to the boundaries are entirely unsuitable for new residential development either because new dwellings will be unacceptably overlooked or the existing houses will suffer the same impact from the new dwellings. In addition, the recently converted residential property in The Quadrangle will lose its garden entirely.

Heritage

In addition to the concerns over the impact of the housing allocation for the whole MAIN 232 suite, the smaller 361 plot abuts the garden of the Grade II listed Hensington Farmhouse on all three sides as currently drawn. Moreover the property includes a curtilage listed building used as an annexe that abuts the boundary of plot 361. Surrounding this property with new development on three sides and directly abutting a curtilage listed building will have a significant and detrimental impact upon its setting that will be harmful to its historical interest.

Trees
Two mature walnut trees one lying on the boundary of the rear garden of Hensington Farmhouse and the other immediately to the rear of the row of cottages to the east of the farmhouse would both fall within category A of table 1 of the British Standards document 'BS5837:2012 Trees in Relation to Design, Demolition and Construction - Recommendations'.

Those trees are ones that are of high quality with an estimated life expectancy of at least 40 years and that are particularly good examples of their species so that they make a significant contribution towards visual amenity and local landscape quality. In addition to those two category 'A' trees there are a number of other mature specimens of high quality (category 'B') including the Crack Willow tree on the western boundary of Hensington Farmhouse. The combination of the presence of these trees, either within the site allocation or on its boundary, is that there will be implications for the proposed housing allocation. Root Protection Areas (RPAs) are the areas that extend to a distance from the base of the tree of twelve times its diameter (at a point 1 metre above ground level). Following the 'recommendations' in the above British Standards document in respect of RPAs would severely compromise the ability of development to occur in the two small paddocks that form the southern portion of site 361 and lie either side of the garden of Hensington Farmhouse both in terms of the need to avoid development within the RPAs and the shadowing effect that would occur for a dwelling in the vicinity of the trees. Given the characteristics of the site and with particular regard to the established mature trees that define the site boundaries the ability of new development to adequately utilise the two paddocks in a way that avoids the harm to high quality trees that is identified above is highly questionable.

Ecology

The site contains two existing ponds to the north of plot 361 close to its boundaries with plots 360 and 366. There is likely to be a variety of ecological interest within these ponds as well as a harmful impact upon a number of species that would utilise these ponds for feeding, shelter or breeding. The site is bordered to the north by a stone wall and mature hedging surrounds the site on other boundaries. These feature are also likely to make a valuable contribution towards local ecology. The land is rough pasture that is underused for grazing and likely to be significantly more diverse ecologically than the arable land to the north forming the remainder of MAIN 232.

Inability to achieve comprehensive development

Having regard to all of the constraints that exist within the two small paddock areas that lie either side of the rear garden of Hensington Farmhouse, their inclusion will make it difficult to achieve a comprehensive development over the entirety of plot 361. These areas are traditionally part of the gardens and not the field and the inclusion of these two areas would alter the character as well as be very unneighbourly. Given the difficulty in achieving housing in these two paddocks due to the constraints within the paddocks and on their boundaries, they may be used as public open space. Utilising these peripheral areas may leave the rest of the development with less public open which will not result in a comprehensive scheme or one that focusses on a public open space of sufficient quality.

Conclusion

The list of additional housing sites forming the proposed modifications to the Plan has been prepared in response to the Inspector's concerns about the soundness of the plan. They have been identified quickly and the reasons why they were selected in preference to other sites has not been published raising questions over the effectiveness of the public consultation exercise. The allocation appears to reflect local land ownership...
The reasons why the additional housing sites were selected in preference to other sites has not been published. This would lead me to believe the public consultation was not adequate or effective. The allocation seems to be based on who owns the land rather than looking at objective reasons. There are other sites in Woodstock that would not have the same impact from a transport, sustainability point of view. The Plan can only be deemed as sound with its removal as the harmful effects cannot be mitigated.

Introduction

This site is one of three medium to large housing development sites around Woodstock that are being put forward as main modifications to the draft submission of the West Oxfordshire Local Plan 2031 (the Plan). These changes are proposed in response to issues raised by the Local Plan Inspector, Simon Emerson, who suspended the Local Plan Examination on 25th January 2016. He had expressed concerns about the robustness of the Plan to meet housing demand partly in terms of the overall number of new housing units proposed to be provided during the Plan period to meet the needs of the area covered by West Oxfordshire District Council (WODC) and partly in terms of the failure of the Plan to make provision for the unmet needs of Oxford City. Consequently a range of new housing sites across the District are now proposed to supplement those sites that were already allocated for new housing in the Plan.

rather than forming a conclusion based upon any objectively assessed examination of the site specific details of the allocation boundary.

The issues that have been identified in the preceding sections are critical to the soundness of the Plan in terms of its justification and its consistency with national policy.

Given that other locations around Woodstock would not have the same impact in terms of transport, sustainability and harm to a nationally important heritage assets, it would seem that, in the absence of an overriding public need to have housing on this site, then the site should be deleted from the draft WOLP at this stage as these three planning concerns should indicate that the site is not suitable because the harmful impacts cannot be mitigated and the Plan can only be found to be sound with the removal of MAIN 232.

Notwithstanding the above conclusions relating to the whole of MAIN 232 and without prejudice to the comments advocating its deletion from the Plan, if it is nevertheless decided to include an allocation of housing on MAIN 232, then it is also contended that the planning harm identified in the sections above indicates that plot 361, as stated comprising about 18.7% of the total area of MAIN 232, should be removed from the Plan as this portion of the wider allocation is the area that causes the majority of the planning harm identified. Retaining the land as pasture along with its ecological features will provide a ‘green lung’ for this part of Woodstock and will make a significant contribution to the local network of green infrastructure. Removing it would eliminate this harm and provide a buffer to the development area and will enable the Plan to be better justified and achieve greater compliance with national policy.

Finally, even if MAIN 232 is included within the Plan along with its plot 361, it is also advocated that the two small paddocks lying either side of the rear garden of Hensington Farmhouse are deleted from the boundary of the allocation. It is the inclusion of these two paddocks that will result in the greatest harm in terms of the impact on the setting of the listed building and the trees of highest quality along with some of the greatest harm to residential amenity. The soundness of the Plan in terms of its justification and consistency with national policy will be significantly improved with these two small areas removed and the impact upon the ability of the site to be comprehensively developed will be improved whilst there will be little or no loss of overall housing numbers as a result of this small modification.
The ‘Soundness’ of the Local Plan

The consultation invites comments on the legality and soundness of the Plan. The comments provided within this consultation response deal solely with the soundness of the Plan in terms of the inclusion of the MAIN 232 site for housing.

The soundness of a Local Plan has been the subject of research by the Planning Advisory Service and others and a number of criteria have been used to assess soundness. These are whether the Plan is positively prepared, justified, effective and consistent with national policy. The comments provided within this consultation response relate mainly to the justification for choosing to allocate this potential housing site and whether the allocation is consistent with national policy. In terms of assessing justification and compliance with national policy, regard has been had to whether the decision to allocate this site is backed up by research and conclusions that indicate the appropriateness of the site in terms of issues that are of material planning importance, whether the site is one that is favourable in terms of proportionate evidence compared to available alternatives and how the allocation can be concluded as being a sustainable proposal when considered against the sustainability criteria set out in the National Planning Policy Framework (NPPF).

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This large site is referred to as MAIN 232 and comprises land to the north of Banbury Road, Woodstock upon which it is anticipated that 250 houses could be provided by 2031. It is a combined site of three separate parcels of land that are themselves individually referenced in the WODC document ‘Strategic Housing and Economic Land Availability Assessment’ (SHEELA) as sites 360 (land north of Banbury Road), 361 (Green Lane, Woodstock) and 366 (Land East of Owen Mumford). These sites have areas of 6.37ha, 3.17ha and 7.38ha respectively, totalling 16.92ha for the whole of the MAIN 232 site. Sites 360 and 366 are essentially the two southerly portions of a much larger arable field, whereas site 361 is a much smaller and separate pasture, forming only 18.7% of the total MAIN 232 site. The site is believed to be within a single ownership of Blenheim Estates and has come forward as a potential site as a result of the land owner’s intention to include the land as an allocated development site within the draft WODC Local Plan 2031.

In terms of the wider MAIN 232 site, as detailed above, it would be remote from the historic core of Woodstock. Although a minor access point could be achieved through a gap in buildings along Green Lane, this could only be a secondary access and the main access would be off Banbury Road towards the edge of the built up area. This is some distance from the centre of Woodstock and the distance to the locations of dwellings within the new development would probably be at least twice the distance from the centre of Woodstock to the access road. Given the degree to which people are able to use walking or cycling as a means of travel is wholly in proportion to the distance covered, it follows that the ability of any new residents to access the goods and services provided within the town of Woodstock would therefore be severely hampered due to the overall distance involved. The bus service along Banbury Road is limited and an extension of the service into a development of 250 houses would be unviable and extremely unlikely.

The inevitable conclusion is that the overwhelming number of households would be effectively limited to the private car, certainly as a means of accessing the goods and services within Woodstock and most likely for trips to destinations further afield as well. Given the dependence upon the private car, the development would effectively be a remote satellite to Woodstock, adding to congestion on Banbury Rod, reducing air quality and road safety, leaving non-drivers less able to access goods services, employment and other opportunities and therefore failing to adhere to the principles of sustainable development and would not result in the creation of sustainable communities in line with government policy. The NPPF seeks to encourage solutions which support
reductions in greenhouse gas emissions and congestion (paragraph 29) including supporting a pattern of
development which, where reasonable to do so, facilitates the use of sustainable modes of transport
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The wider MAIN 232 site also lies in the middle of an important view cone for Blenheim Palace, a World
Heritage Site across Woodstock and there is no argument for allowing any impact upon the landscape setting
of this nationally important Heritage Asset. The open and rolling nature of the landscape is described in
WODC’s own Landscape Character Assessment as an area characterised as ‘semi-enclosed limestone wolds’.
This type of landscape is particularly sensitive to new development and in the absence of significant existing
natural vegetation or landscape or other topographical features, the land is simply not capable of absorbing
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Those landscape qualities and the appreciation of the setting of Blenheim Palace are available to the public
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Residential amenity

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residential dwelling and a portion of the paddock the rear has now been fenced off to provide a private garden
for the occupants. However the boundary of the housing allocation is drawn tightly up against the rear

boundary of the building and would divorce the private garden from the house leaving it with no private amenity space at all. The row of cottages along the Banbury Road immediately to the east of Hensington Farmhouse have extremely small rear gardens as do all of the properties in Ramillies Close.

The windows from the backs of all of these houses, over 25 dwellings in total, have a variety of standard rear windows that look out directly over the wider plot 361 area and the two parcels of land either side of the rear garden of Hensington Farmhouse. This will mean that the areas immediately adjacent to the boundaries are entirely unsuitable for new residential development either because new dwellings will be unacceptably overlooked or the existing houses will suffer the same impact from the new dwellings. In addition, the recently converted residential property in The Quadrangle will lose its garden entirely.

Heritage

In addition to the concerns over the impact of the housing allocation for the whole MAIN 232 suite, the smaller 361 plot abuts the garden of the Grade II listed Hensington Farmhouse on all three sides as currently drawn. Moreover the property includes a curtilage listed building used an annexe that abuts the boundary of plot 361. Surrounding this property with new development on three sides and directly abutting a curtilage listed building will have a significant and detrimental impact upon its setting that will be harmful to its historical interest.

Trees

Two mature walnut trees one lying on the boundary of the rear garden of Hensington Farmhouse and the other immediately to the rear of the row of cottages to the east of the farmhouse would both fall within category A of table 1 of the British Standards document 'BS5837:2012 Trees in Relation to Design, Demolition and Construction - Recommendations'. Those trees are ones that are of high quality with an estimated life expectancy of at least 40 years and that are particularly good examples of their species so that they make a significant contribution towards visual amenity and local landscape quality. In addition to those two category ‘A’ trees there are a number of other mature specimens of high quality (category ‘B’) including the Crack Willow tree on the western boundary of Hensington Farmhouse. The combination of the presence of these trees, either within the site allocation or on its boundary, is that there will be implications for the proposed housing allocation. Root Protection Areas (RPAs) are the areas that extend to a distance from the base of the tree of twelve times its diameter (at a point 1 metre above ground level). Following the ‘recommendations’ in the above British Standards document in respect of RPAs would severely compromise the ability of development to occur in the two small paddocks that form the southern portion of site 361 and lie either side of the garden of Hensington Farmhouse both in terms of the need to avoid development within the RPAs and the shadowing effect that would occur for a dwelling in the vicinity of the trees. Given the characteristics of the site and with particular regard to the established mature trees that define the site boundaries the ability of new development to adequately utilise the two paddocks in a way that avoids the harm to high quality trees that is identified above is highly questionable.

Ecology

The site contains two existing ponds to the north of plot 361 close to its boundaries with plots 360 and 366. There is likely to be a variety of ecological interest within these ponds as well as a harmful impact upon a number of species that would utilise these ponds for feeding, shelter or breeding. The site is bordered to the north by a stone wall and mature hedging surrounds the site on other boundaries. These feature are also likely to make a valuable contribution towards local ecology. The land is rough pasture that is underused for grazing and likely to be significantly more diverse ecologically than the arable land to the north forming the remainder
of MAIN 232.

Inability to achieve comprehensive development

Having regard to all of the constraints that exist within the two small paddock areas that lie either side of the rear garden of Hensington Farmhouse, their inclusion will make it difficult to achieve a comprehensive development over the entirety of plot 361. These areas are traditionally part of the gardens and not the field and the inclusion of these two areas would alter the character as well as be very unneighbourly. Given the difficulty in achieving housing on these two paddocks the spaces may be used as part of open space which would leave the rest of the development with less space so try and argue that the space will not easily be incorporated into a comprehensive scheme.

Conclusion

The list of additional housing sites forming the proposed modifications to the Plan has been prepared in response to the Inspector’s concerns about the soundness of the plan. They have been identified quickly and the reasons why they were selected in preference to other sites has not been published raising questions over the effectiveness of the public consultation exercise. The allocation appears to reflect local land ownership rather than forming a conclusion based upon any objectively assessed examination of the site specific details of the allocation boundary.

The issues that have been identified in the preceding sections are critical to the soundness of the Plan in terms of its justification and its consistency with national policy.

Given that other locations around Woodstock would not have the same impact in terms of transport, sustainability and harm to a nationally important heritage assets, it would seem that, in the absence of an overriding public need to have housing on this site, then the site should be deleted from the draft WOLP at this stage as these three planning concerns should indicate that the site is not suitable because the harmful impacts cannot be mitigated and the Plan can only be found to be sound with the removal of MAIN 232.

Notwithstanding the above conclusions relating to the whole of MAIN 232 and without prejudice to the comments advocating its deletion from the Plan, if it is nevertheless decided to include an allocation of housing on MAIN 232, then it is also contended that the planning harm identified in the sections above indicates that plot 361, as stated comprising about 18.7% of the total area of MAIN 232, should be removed from the Plan as this portion of the wider allocation is the area that causes the majority of the planning harm identified. Retaining the land as pasture along with its ecological features will provide a ‘green lung’ for this part of Woodstock and will make a significant contribution to the local network of green infrastructure. Removing it would eliminate this harm and provide a buffer to the development area and will enable the Plan to be better justified and achieve greater compliance with national policy.

Finally, even if MAIN 232 is included within the Plan along with its plot 361, it is also advocated that the two small paddocks lying either side of the rear garden of Hensington Farmhouse are deleted from the boundary of the allocation. It is the inclusion of these two paddocks that will result in the greatest harm in terms of the impact on the setting of the listed building and the trees of highest quality along with some of the greatest harm to residential amenity. The soundness of the Plan in terms of its justification and consistency with national policy will be significantly improved with these two small areas removed and the impact upon the ability of the site to be comprehensively developed will be improved whilst there will be little or no loss of overall housing numbers as a result of this small modification.
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<td>Dr C Battersby</td>
<td>Dr</td>
<td>Battersby</td>
<td>117</td>
<td>&gt; APPENDIX 3 &gt; MAIN 240</td>
<td>In the documentation, p. 87 of 98 pp. in <a href="http://www.westoxon.gov.uk/media/1504775/SA-Addendum-Appendices-I-VI.pdf">www.westoxon.gov.uk/media/1504775/SA-Addendum-Appendices-I-VI.pdf</a> [<a href="http://www.westoxon.gov.uk/media/1504775/SA-Addendum-Appendices-I-VI.pdf">http://www.westoxon.gov.uk/media/1504775/SA-Addendum-Appendices-I-VI.pdf</a>], it is stated that the site north of Jefferson’s Piece is around 650m from Charlbury Primary School, and has excellent access to existing educational facilities. It is further stated that in terms of the objective of improving education and training, it will have positive effects. It is, however, unclear that this is the case, given that there is no obvious way for the school to expand on its existing site and Charlbury Primary School cannot handle all existing families living in the town. In recent years families living on, for example, Nine Acres and Hixet Wood have missed out on entrance to Charlbury Primary School, due to proximity rules. This development is indeed fairly close to the school, but it is likely to push out even more applicants from properties that already exist within the town. Thus, parents who already live within the Charlbury, but with children currently below school age, will be disadvantaged by this proposed development. As such, this claim is unfounded and is unsound.</td>
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<td>MM101</td>
<td>West Oxfordshire District Council</td>
<td>A.Thomson</td>
<td>Mr</td>
<td>Thomson</td>
<td>264</td>
<td>&gt; APPENDIX 3 &gt; MAIN 242</td>
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