



Main Modifications Consultation Statement

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I. Introduction

- 1.1 Public consultation on proposed changes to the draft West Oxfordshire Local Plan 2031 took place for 6-weeks from 11th November – 23rd December 2016.
- 1.2 There were 1,002 respondents to the consultation including members of the public, town and parish councils, other local authorities, statutory agencies, other organisations, developers, agents and landowners. In addition, a petition of 26 names was received in relation to proposed growth at Chipping Norton.
- 1.3 Excluding the petition, a total of 2,564 individual comments on the proposed changes have been registered (a result of some respondents making multiple comments).
- 1.4 This report provides an overview of the main issues raised through the consultation and the Council's initial response.
- 1.5 It will be submitted to the Planning Inspector as part of a package of documentation to help inform the next stage of the Local Plan examination.

2. Background

- 2.1 The Council formally published the pre-submission draft West Oxfordshire Local Plan 2031 in March 2015 for a statutory 6-week period of consultation. Responses were received from around 150 individuals and organisations.
- 2.2 The plan was formally submitted for examination in July 2015 and the appointed Inspector, Mr Simon Emerson held an initial set of hearings in November 2015. Key matters considered included the duty to co-operate, the housing requirement (including the unmet housing needs of Oxford City) and housing supply and delivery.
- 2.3 The Inspector's preliminary findings were published in December 2015 and whilst the Inspector accepted that the Council had satisfied all statutory requirements and the duty to co-operate, he raised concerns regarding the proposed housing requirement and a number of other related issues.
- 2.4 The examination was suspended in January 2016 to allow the Council to undertake additional work and prepare a series of proposed changes to the plan.
- 2.5 The proposed changes (including more significant 'main' changes and minor 'additional' changes) were published for consultation from 11 November – 23 December 2016.
- 2.6 2,564 comments were received from 1,002 respondents including members of the public, town and parish councils, other local authorities, statutory agencies, other organisations, developers, agents and landowners. In addition, a petition of 26 names was received in relation to proposed growth at Chipping Norton.
- 2.7 This is a much more significant level of response than when the plan was first published in 2015 which is likely to be a result of the housing requirement increasing significantly and additional sites being allocated for development.

3. Summary of Main Issues Raised

- 3.1 This section of the report provides a summary overview of the main issues raised through the consultation with the exception of Section 9 – Strategy at the Local Level which is addressed in the following section.
- 3.2 Given the volume of comments received it is not possible to summarise all of the issues that have been raised and the focus is on issues of particular importance to the ‘soundness’ of the plan including a number of recurring issues that have been raised by multiple respondents.
- 3.3 A complete, composite schedule of all comments received is available separately and will be submitted to the Inspector together with copies of the representations themselves.
- 3.4 The main issues are set out in summary form below together with the Council’s preliminary response.

Issue 1 – The extent of the proposed modifications to the Local Plan are so significant that the Council should have instead withdrawn the plan and started again. The consequence of not doing so is that a number of reasonable alternatives have not been properly considered and evaluated.

Council’s Response:

The Council acknowledges that the number of proposed changes (242 main modifications) is significant although it does not consider this approach to be unreasonable. The Council has positively responded to the issues raised by the Local Plan Inspector’s Preliminary Findings (December 2015) in preparing the proposed modifications including an increase in the overall housing requirement, the incorporation of ‘unmet’ housing need from Oxford City and the allocation of additional sites to provide additional certainty and boost housing land supply.

In his preliminary findings the Inspector gave the Council the choice of either withdrawing the plan or putting forward changes to make it sound. The Council made the decision to proceed on the basis of proposed changes to the plan and this is considered appropriate.

In preparing the proposed changes the Council was informed by a call for sites exercise undertaken in early 2016 and a subsequent review of the SHLAA. The Council was also informed by the extensive technical evidence base supporting the collective Oxfordshire Growth Board work on Oxford’s unmet housing need as well as its own technical evidence including Sustainability Appraisal. A wide range of sites have therefore been considered and assessed.

Withdrawing the plan and ‘going back to the drawing board’ would have led to significant delay.

At this point and based on the available evidence the Council believes it has considered all reasonable alternatives and that progressing the plan through proposed modifications is entirely appropriate.

Issue 2 - The proposed modifications represent a significant departure from the submitted 'three town' strategy by introducing major additional growth at Eynsham and to a lesser extent Woodstock. Additional growth should instead be proposed at Witney, Carterton and Chipping Norton.

Council's Response:

The Council does not accept that the proposed modifications represent a significant departure from the submitted spatial strategy which is based on a 'three town' approach, focusing growth primarily at Witney, Carterton and Chipping Norton – the District's three main towns.

The proposed modifications do not depart from this approach, indeed a large proportion of the overall housing requirement will be accommodated through planned growth at Witney, Carterton and Chipping Norton.

The number of homes proposed in the Eynsham – Woodstock sub-area has been increased significantly, largely a result of planned growth at Eynsham which is primarily intended to meet Oxford City's 'unmet' housing needs.

The site options assessment undertaken on behalf of the Oxfordshire Growth Board to inform the apportionment of unmet need confirms that land at Eynsham performs well when assessed against other reasonable alternatives within West Oxfordshire and across Oxfordshire as a whole.

The Inspector's preliminary findings confirmed that in undertaking any further work on the plan the Council would need to consider the implications of any apportionment to West Oxfordshire of Oxford City's unmet housing needs and that is what the Council has done by identifying additional allocations at Eynsham including the proposed garden village.

To have identified additional allocations at Witney, Carterton or Chipping Norton to address the apportionment of unmet need from Oxford would have been entirely contrary to the evidence base that underpinned the apportionment process.

Issue 3 – The extent and nature of the proposed modifications are such that they have created 'internal conflict' within the plan for example between the proposed vision and core objectives and the quantum of development being planned for and sites that are proposed to be allocated.

Council's Response:

The proposed modifications are based on a significant increase in the overall housing requirement and an increase in planned housing supply through a combination of large strategic sites and smaller non-strategic sites. Inevitably the increase in planned growth has the potential to have a more significant impact on the District in terms of landscape, character, traffic, heritage, infrastructure etc. but the Council does not accept that its proposed strategy and site allocations create a conflict with the overall vision and objectives of the plan. The Council has sought through the proposed modifications to strike an appropriate balance between the need to increase the housing requirement and the need to ensure West Oxfordshire remains an attractive place in which to live, work, play and visit. Clearly there will be significant change to some parts of the District as result of the plan in particular around the larger settlements where major growth is proposed, but the plan seeks to manage this change in a sustainable, effective manner.

Issue 4 – Support from the development industry for the proposed increase in the housing requirement relating to West Oxfordshire’s housing need (i.e. 13,200 homes) but views that it should be expressed as a minimum throughout the plan and not a ‘ceiling’ to development. Some alternative views from developers that the requirement should be increased further to meet affordable housing need. Counter views from others that the underpinning evidence set out in the Oxfordshire SHMA is flawed and that as a result the proposed housing requirement is too high.

Council’s Response:

Whilst the Council raised some initial concerns regarding the Oxfordshire Strategic Housing Market Assessment, in order to ensure consistency with the rest of the Oxfordshire local authorities a decision was taken to adopt the SHMA mid-point figure of 660 homes per year (13,200 in total).

During the suspension of the Local Plan examination, the Council commissioned additional evidence¹ which suggests that there may be a case for a lower housing requirement. However the Council does not intend to rely on this alternative evidence in support of the Local Plan.

Although the Council is prepared to accept the SHMA midpoint figure of 660 homes per year, it does not consider that the housing requirement should be increased to 685 homes per year or 688 homes per year to meet affordable housing need in full. Whilst clearly it is open to the Council to consider a potential uplift in housing provision to meet affordable housing need, the proposed target of 660 homes per year is already likely to prove extremely challenging to deliver particularly when the additional provision for Oxford City’s unmet need is also factored in.

In his preliminary findings the Local Plan Inspector highlighted that the SHMA midpoint figure of 660 homes per year would largely overcome the shortcomings he had identified. The decision to adopt this figure within the proposed modifications is therefore considered appropriate. Notably the significant majority of respondents from within the development industry support the use of the SHMA mid-point and only a very few respondents have suggested that it should be increased for affordable housing need.

The Council does however accept that the overall housing requirement (13,200 homes) is not a maximum ‘ceiling’ to development and should be expressed as a minimum throughout the Local Plan (noting that this is already the case at a number of points within the document).

In terms of the criticisms of the SHMA made by some respondents, the Council acknowledges that some debate exists about the validity of the SHMA findings but it has been accepted by all of the Oxfordshire authorities for the purposes of plan making.

¹ Oxfordshire Strategic Housing Market Assessment Partial Update (July 2016) and Oxfordshire Strategic Housing Market Second Partial Update (November 2016) – Peter Brett Associates

Issue 5 – Support primarily from the development industry for the provision being made within the plan to assist Oxford City with its unmet housing need. Some parties have however highlighted a degree of uncertainty both in terms of the overall level of unmet need to be planned for and also South Oxfordshire District Council's failure to agree its apportionment of unmet need. In light of this uncertainty, either the plan should be put on hold, build in additional flexibility or include a commitment to an early review should the amount of unmet need increase. Significant concerns have also been expressed by a large number of respondents in relation to the potential scale of growth at Eynsham which many feel is disproportionate and not justified or necessary.

Council's Response:

The Council has sought to positively respond to the Local Plan Inspector's preliminary findings and the work co-ordinated by the Oxfordshire Growth Board (OGB) by incorporating an additional 2,750 homes into the overall housing requirement.

This is the level of provision set out in the memorandum of co-operation which was agreed by the District Council at a meeting of the Oxfordshire Growth Board on 26 September 2016. The overall apportionment contained in the memorandum is set out below. This is based on the agreed 'working assumption' of the Oxfordshire authorities that the appropriate level of unmet need to plan for is 15,000 homes.

Local Authority	Recommended apportionment
Cherwell	4,400
Oxford	550
South	4,950
Vale	2,200
West	2,750
Total	14,850

All of the authorities with the exception of South Oxfordshire District Council agreed this proposed apportionment.

The Council considers that it is for South Oxfordshire and the other District Councils to determine through their own local plan processes the extent to which they are able to assist Oxford City with unmet housing need.

West Oxfordshire District Council cannot put its own local plan on hold indefinitely and to expect it do so is entirely unreasonable. The Council is aiming to adopt its new local plan as soon as possible and has responded positively to the Local Plan Inspector's preliminary findings by incorporating its agreed share as set out in the memorandum of co-operation i.e. 2,750 homes.

To have made provision for any other figure (either less or more) would not have been credible or based on any substantive evidence base.

Similarly, whilst the Council is aware that some parties have called into question the 15,000 dwelling unmet need 'working assumption' in the absence of any agreed alternative it is not considered that at this point in time anything different could have been used as the basis of the proposed modifications.

In due course the Local Plan will be reviewed and at that time there is likely to be new evidence on housing need enabling a decision to be made on whether West Oxfordshire needs to make any additional provision to further assist Oxford City with its unmet housing need. The Council does not consider it necessary to commit to an early review of the plan in this respect.

The specific concerns raised by a large number of respondents in relation to planned growth at Eynsham are summarised in more detail in the following section of this report together with the Council's preliminary response.

Issue 6 – Whilst some support has been expressed for the Council's decision to incorporate an element of Oxford City's unmet housing need, a number of parties have objected on the basis that the proposed modifications assume this provision will be made in the period 2021 – 2031 and that instead it should be planned for immediately. On a related note, a number of parties question the deliverability of 2,750 homes in a 10-year period and the decision of the Council to provide this all in one location (Eynsham) rather than across the District.

Council's Response:

The Council acknowledges that Oxford City's housing need is a pressing matter and that the need exists now and not just in the future. The key responsibility for housing delivery to meet this need falls to Oxford City. In order to deliver the scale of housing required West Oxfordshire will assist Oxford by contributing towards the unmet element of this housing need. This is in line with the duty to co-operate.

Based on the available evidence² the Council has determined that the most appropriate response to assisting Oxford City is through a new garden village to the north of Eynsham and a sustainable urban extension to the west of Eynsham.

These are both large, strategic options that will have reasonable lead-in times. As such the Council's updated trajectory suggests that the vast majority of development at these two sites will come forward in the period 2021 – 2031.

This is consistent with the proposed apportionment of unmet need set out in the memorandum of co-operation which is based on a common assumed start date of 2021 for the commencement of development after the adoption of the respective Local Plan reviews/update/refresh.

As set out in the memorandum of co-operation, this assumption does not preclude earlier delivery, but does recognise the complexity of the issues being considered and consequently has sought to factor in

² Oxford Spatial Options Assessment (LUC – September 2016), Sustainability Appraisal Addendum Report (Enfusion – October 2016), Strategic Housing and Economic Land Availability Assessment (WODC – 2016)

reasonable lead times to enable options to come forward and to be fully considered through the Local Plan process. It also recognises that to deliver the scale of growth required in a sustainable manner, large strategic options will be required.

The District Council will do what it reasonably can to accelerate the delivery of these new homes to assist with Oxford's unmet need. The award of garden village status from Government and the associated additional funding provided will for example be used to support the planning process including the preparation and adoption of an 'Area Action Plan' (AAP).

However it is inevitable that there will be a reasonable lead-in time to the commencement of development particularly in relation to the proposed garden village.

It is important to note that Oxford City Council is supportive of the Council's proposed approach to meeting its housing need through planned strategic growth at Eynsham.

The delivery of strategic growth at Eynsham has the potential to deliver significant benefits including a new science park, park and ride with bus priority, new schools, strategic road infrastructure, community facilities and so on. None of this would be possible with a more dispersed approach to development based on a large number of smaller sites. A dispersed approach to meeting Oxford's unmet need would also be inconsistent with the available evidence base.

In terms of delivery of growth at Eynsham within the 10-year period 2021 – 2031, the Council recognises that this will be particularly challenging but does not consider it to be unrealistic in the context of Government interventions to fix the broken housing market of which garden villages can form a key part.

With regard to the land west of Eynsham, small parts of the site are already committed through the planning process (i.e. planning permission or resolution to grant planning permission) and significant progress is being made by Berkeley Homes to co-ordinate the development as a whole. The Council's housing trajectory assumes that 150 homes will be completed by 2021 with the remaining 850 homes to be delivered in the period 2021 – 2031 (i.e. an average of 85 dwellings per year). This is considered to be reasonable and realistic.

With regard to the proposed garden village north of Eynsham the Council's housing trajectory assumes the delivery of 2,200 homes in the 10-year period 2021 – 2031 (i.e. 220 per year) although as noted above the Council will seek to accelerate the start of development.

The Council recognises that this will be challenging to deliver but does not consider that it is unrealistic. Multiple builders are likely to be present (including potentially small-scale and volume house builders) and the garden village funding will be used to consider all reasonable means of accelerating housing delivery.

Issue 7 – Concern that the proposed level of housing delivery identified in the Local Plan (which includes past completions, existing commitments, allocations and windfall developments) falls short of the overall housing requirement (15,950 homes) and that not only should the entire housing requirement be accounted for but additional flexibility and 'headroom' should be built into the plan to allow for potential non-implementation of permissions and allocations.

Council's Response:

In Part 2 of his preliminary findings the Local Plan Inspector stated that, in any further work the Council will need to include in the plan sufficient additional site allocations to support the delivery of an ongoing 5 year supply and that as a minimum allocations should ensure adequate delivery for sufficient time to allow for

any subsequent plan to be adopted which made further allocations.

Anticipated housing delivery in the original submission draft Local Plan was 10,498 homes and the proposed modifications respond positively with an increase in anticipated delivery of over 5,000 new homes.

The overall proposed housing requirement set out in the proposed modifications is 15,950 homes which includes 13,200 homes for West Oxfordshire's housing need and a further 2,750 homes for Oxford City's 'unmet' housing need.

Total planned supply as identified through the proposed modifications falls just short of this at 15,764 homes which comprises past completions, existing commitments, proposed site allocations and anticipated 'windfall' development. The breakdown of anticipated delivery by sub-area is summarised in the table below.

Sub-Area	Indicative Requirement	Anticipated Housing Delivery
Witney Sub-Area	4,400	4,386
Carterton Sub-Area	2,600	2,552
Chipping Norton Sub-Area	2,400	2,326
Eynsham – Woodstock Sub-Area	5,550	5,474
Burford – Charlbury Sub-Area	1,000	1,026
Totals	15,950	15,764

Since the proposed modifications were published in November 2016 a large number of new homes (around 1,000 units) have been granted planning permission either directly by the Council or on appeal. These are not included in the 15,764 delivery figure identified above and will therefore boost housing supply.

The Council considers that it can demonstrate an ongoing 5 year supply.

An updated housing land supply position statement will be published as soon as possible after the end of the current monitoring period (31st March 2017) but in time for the examination in public.

Issue 8 – A number of respondents argue that the Council is unable to demonstrate a robust 5-year housing land supply. There are a number of separate elements to the concerns raised including:

- **Doubts regarding the Council’s assumed supply – anticipated delivery of the identified sites, the inclusion of draft local plan allocations and the inclusion of ‘C2’ uses³ as part of anticipated supply;**
- **The Council’s proposed application of the residual (Liverpool) approach to addressing the past under-provision of housing since 2011 whereby the backlog is spread over the remaining plan period to 2031 rather than in the next 5-years under the alternative ‘Sedgefield’ approach;**
- **Whether in light of the poor level of housing delivery since 2011 the Council’s calculation of 5-year housing land supply should be based on a 20% buffer rather than a 5% buffer;**
- **Whether it is reasonable to treat Oxford City’s unmet housing need separately and effectively ‘ring-fence’ it for the purposes of calculating the Council’s 5-year housing land supply requirement.**

Council’s Response:

The Council considers that it is able to demonstrate a deliverable 5-year supply of housing land in accordance with national policy and that anticipated housing delivery will enable this to be taken forward on a rolling basis. The most recently published housing land supply position statement (October 2016) which covers the period 2016 – 2021 identifies anticipated delivery of 4,514 homes. The Council considers this to be robust.

The Council does not consider it unreasonable to include draft local plan allocations in the assumed five year housing land supply. Since the proposed modifications were published the Council has resolved to grant planning permission for a number of the sites demonstrating a clear commitment to delivery. It is also important to note that the Council has only counted 1,035 units from draft local plan allocations out of a total of 8,169 units. This is considered to be suitably robust and cautious.

The Council also considers that it is reasonable to count C2 uses in the assumed housing land supply in line with the Government’s practice guidance. It is relevant to note that the number of C2 units identified in the Council’s housing land supply position statement (October 2016) makes up a very small proportion of the overall anticipated supply in any case.

In terms of the Council’s proposed application of the residual (Liverpool) methodology again the Council considers this to be justified. The Government’s practice guidance⁴ states that ‘Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible’ (our emphasis).

Whilst the Council accepts that it needs to strive to deliver a significant boost in the supply of housing this must be reasonable and realistic. This was recognised in a recent decision from the Secretary of State for Communities and Local Government in consideration of a planning appeal in Lichfield, Staffordshire (APP/K3415/W/15/3024063). The Council considers that there are direct parallels with the position in

³ Residential institutions

⁴ Housing and economic land availability assessment

West Oxfordshire.

In terms of the application of an additional buffer the Council considers that a 5% buffer remains appropriate based on the Council's strong track record of housing delivery over the longer-term.

In terms of the Council's proposed treatment of Oxford's unmet housing need, the Council considers that this should only be added from 2021 onwards. This approach is consistent with the common assumed start date of 2021 set out in the Oxfordshire Growth Board memorandum of cooperation.

Whilst the Local Plan Inspector's initial view was that any additional apportionment for Oxford's unmet need would need to be taken into account in calculating the 5-year housing land supply, these comments were made prior to the drafting and agreement of the memorandum of co-operation. Indeed, the methodology of the apportionment itself relies on the identification of strategic options which will inevitably have reasonable lead-in times.

If the additional requirement for Oxford City is taken into account from the present day and used in conjunction with the Sedgefield approach and a 20% buffer (as has been suggested by many developers) the total 5-year requirement increases to a level that the Council does not consider to be achievable or sustainable.

As such the Council believes that the additional requirement for Oxford City should be added from 2021 in calculating the 5-year housing land supply.

Issue 9 - The Council has failed to test reasonable alternatives both in terms of the overall strategy (e.g. proposed garden village versus a more dispersed approach and the consideration of other alternative locations for the garden village) and also in terms of the proposed site allocations (e.g. just one option considered at Chipping Norton) and has failed to prepare sufficient evidence to justify its proposed approach.

Specific concerns have been expressed in relation to the Sustainability Appraisal (SA) addendum report and the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA).

Council's Response:

The NPPF states that to meet the test of soundness a Local Plan must be justified i.e. the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

In short the Council considers that the Local Plan as proposed to be modified represents the most appropriate strategy response to meeting the increased housing requirement and the incorporation of unmet housing need from Oxford City. Through the plan preparation process, accompanying Sustainability Appraisal reports and other supporting evidence the Council has considered and tested a number of different spatial strategies to accommodate future growth.

The most recent SA addendum report considers five different strategy options including; Witney Focus, Three Town Focus, Dispersed Growth, Growth along Transport Corridors and a New Village. The reasons for progressing Options 2 and 5 (i.e. the three town approach combined with a new village) are clearly set out in the SA addendum report. In terms of proposed site allocations the Council considers its approach is robust and that it has considered reasonable alternatives through a combination of evidence including the SHELAA and SA addendum report.

Issue 10 – Support from the development industry for the Council’s decision to allocate smaller, non-strategic sites but a concern that the Council has placed an excessive reliance on large, strategic sites with long lead-in times a consequence of which being that much of the anticipated housing delivery will come forward in the period post-2021. Related concerns expressed about the Council’s reliance on anticipated windfall to meet the identified housing requirement. As such a number of developers consider that additional sites should be allocated to assist with housing delivery in the short-term.

Council’s Response:

The Council has sought to positively respond to the issues identified by the Local Plan Inspector in his preliminary findings by allocating 15 smaller, ‘non-strategic’ sites to help boost short term housing land supply. The Council does not accept that an excessive reliance has been placed on large, strategic sites. In total around 6,450 new homes are expected to come forward on strategic sites and whilst this is a large component of the overall planned supply, it is not considered to be unreasonable or excessive.

Large strategic sites have significant potential benefits in terms of the provision of affordable housing and supporting infrastructure and the Council has sought to achieve a reasonable balance between such sites and the proposed smaller allocations which total around 1,700 homes.

Ultimately to deliver the scale of growth planned for the District, large strategic sites are an essential element of the housing mix.

In terms of timescales it is anticipated that 4,514 homes will be delivered in the period 2016 – 2021 with a further 9,786 homes in the period 2021 – 2031. Whilst this appears to ‘backload’ the growth towards the later part of the plan period, when considered in five-year tranches, the level of planned housing delivery is relatively evenly distributed with 5,742 homes in the period 2021 – 2026 and 4,044 homes in the period 2026 – 2031. This is considered reasonable and will ensure a consistent supply of new homes to 2031.

In terms of windfall development, the proposed modifications assume delivery of 1,380 homes from unidentified ‘windfall’ sites in the period 2016 – 2031. In accordance with the Local Plan Inspector’s preliminary findings, this has been broken down on a sub-area basis having regard to past trends. The Council’s approach is considered entirely reasonable and in reality the number of new homes permitted on such a windfall basis is likely to exceed 1,380 homes.

Issue 11 - Support from the development industry for the more flexible approach being taken by the Council towards new housing in villages including the development of undeveloped land in fringe locations but a concern that the wording of Policy OS2 which refers to ‘limited’ development places an unreasonable restriction on development.

Council’s Response:

The Council recognises the need to adopt a greater degree of flexibility than the adopted Local Plan in order to deliver the necessary boost in housing supply. This is reflected in policies OS2 and H2 as proposed to be modified, both of which allow for the development of undeveloped land in fringe locations subject to certain criteria being met.

In accordance with the overall strategy the primary focus of growth is the three main towns followed by the rural service centres and villages. The wording of Policy OS2 as proposed to be modified is such that the villages are identified as being ‘suitable for limited development which respects the village character and

local distinctiveness and would help to maintain the vitality of the local community’.

This approach is considered entirely reasonable given that the primary focus of growth is the three main towns and the rural service centres.

Whilst the plan acknowledges that new homes in villages will be needed it is important that the scale of growth in such locations is appropriate and reflects for example the availability (or lack of) local services and facilities including public transport. This is a particularly important issue following the County Council’s withdrawal of a number of bus service subsidies in July 2016.

Issue 12 – The Council has failed to demonstrate any exceptional circumstances and as such the proposed site allocations within the Cotswolds Area of Outstanding Natural Beauty (AONB) should be removed.

Council’s Response:

The NPPF does not preclude the possibility of development taking place within the AONB rather it emphasises that great weight should be given to conserving landscape and scenic beauty with planning permission for major development to be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest.

The proposed modifications seek to allocate 15 smaller ‘non-strategic’ housing sites, just four of which are within the Cotswolds AONB. Taken together the four proposed allocations within the AONB are intended to provide 219 homes – a relatively modest number across four separate sites.

Furthermore since the proposed modifications were published one of the sites (Land South of Milton Road, Shipton under Wychwood) has secured a resolution to grant planning permission.

The proposed modifications explain the rationale behind the proposed allocations and the reason why the Council considers there to be exceptional circumstances and also demonstrable public benefit in bringing the sites forward.

Notably around one third of the District is covered by the AONB and it washes across most of the Burford – Charlbury Sub-Area including the two rural service centres of Burford and Charlbury as well as a number of the larger villages. In order to sustain the vitality and viability of those villages some development is necessary and it is not appropriate to impose a blanket ban on development within the AONB.

If this approach were to be taken there would be no opportunity to provide new housing including affordable housing for those in need across a large proportion of the District. Whilst the allocated sites will clearly need to be taken forward very carefully it is considered that they are suitable in principle for residential development.

Issue 13 – Objections from a number of developers to the Council’s proposed requirements relating to:

- **Optional water efficiency building regulations (Policy OS3)**
- **Accessible and adaptable housing (Policy H4)**
- **Wheelchair adaptable housing (Policy H4)**
- **Energy assessment or strategy for decentralised energy systems (Policy EH4)**

Specific concerns have been expressed that the Council has failed to produce sufficient evidence to justify these requirements and has failed to take into account the potential impact on the viability of development.

Council’s Response:

With regard to the optional building regulation relating to water efficiency, the Environment Agency is fully supportive of the Council’s proposed approach given that West Oxfordshire is located within an area of demonstrable water stress. The justification for seeking to introduce this optional requirement is further confirmed in evidence commissioned by the Council during the suspension of the Local Plan examination⁵. The implications of the optional requirement for viability are minimal and have been factored into the Council’s updated viability assessment⁶.

In terms of the requirements set out in Policy H4 (accessible and adaptable housing and wheelchair adaptable housing) the proposed modifications apply these requirements only to larger residential developments of 50 or more units. This approach is considered reasonable having regard to available projections which suggest a significant increase in the number of older people and people with disabilities. The Council’s updated viability evidence factors in these additional requirements and demonstrates that they will not place an unreasonable cost burden on developments of 50 or more homes.

Finally in terms of Policy EH4, the proposed modifications seek to ensure that all developments of 100 or more homes are supported by an energy assessment or strategy ‘which assesses viability for decentralised energy systems....’ (emphasis added). This is not a policy requirement of development itself rather it requires the issue to be explored further as part of the consideration of any larger residential development proposal.

This approach is considered to be entirely reasonable. The Government remains committed to increasing the use and supply of renewable and low-carbon energy. Decentralised energy systems are likely to become increasingly important, especially associated with larger sites.

⁵ Water Cycle Study Phase 1 Scoping Report (AECOM 2016)

⁶ SDA Viability Update (Aspinall Verdi November 2016) and Local Plan and CIL Viability Assessment (AspinallVerdi December 2016)

Issue 14 - General support for the Council's proposed approach towards affordable housing provision including the provision of starter homes as part of the affordable housing mix and the reduced requirements proposed for 'supported living' residential schemes. However concerns have been raised about the proposed value zones (high, medium and low) to be used for the purposes of informing the affordable housing requirement.

Council's Response:

The support expressed is noted and welcomed. With regard to the reduced requirements for affordable housing in supported living schemes the proposed modification which sought to apply a much reduced requirement, was based on information set out in the Council's first viability update report (February 2015).

However since the proposed modifications were published, the second viability update report has been finalised (December 2016) which adopts a number of different assumptions in testing the viability of such schemes (based on more recent available evidence) and this suggests that they are capable of accommodating a higher proportion of affordable housing than suggested in the proposed modifications to Policy H3.

This issue will need to be further considered through the examination process with potential changes to Policy H3 being necessary in light of this more recent evidence.

With regard to the three proposed 'value zones' in his preliminary findings the Local Plan Inspector concluded that these were justified on the basis of the Council's viability assessment (February 2015). This has since been updated with a further analysis of new build and second hand achieved sales values in the most recent viability assessment (December 2016) and the consultants have concluded that the three value zones are reasonably representative and have the advantage of not being overly complex.

Issue 15 – Concerns expressed regarding proposed changes to the settlement hierarchy in particular the re-classification of Long Hanborough from 'Rural Service Centre' to 'Village'.

Council's Response:

The rationale for the proposed change to the status of Long Hanborough is explained through the proposed modifications. In short whilst there has been no demonstrable loss of services and facilities at Long Hanborough, a significant amount of new development is planned nearby to the north of Eynsham through the proposed garden village. This will form a new rural service centre, the existence of which reduces the need to have another rural service centre in close proximity.

A key part of the garden village proposal will be to explore the provision of effective links to Hanborough Station. There will be a direct relationship between the two and on this basis the Council considers it appropriate for the garden village to become a new service centre and for Long Hanborough to play a more subservient role as a defined 'village'.

The other proposed changes to the settlement hierarchy relating to Ascott under Wychwood and Minster Lovell have been proposed to ensure consistency with the adopted West Oxfordshire Local Plan (2006).

Issue 16 – A number of respondents have highlighted a drafting error in Policy H2 which refers to criteria that are proposed to be deleted and incorporated into Policy OS2.

Council's Response:

The Council acknowledges that there is a drafting error in the proposed modifications to Policy H2 which will require a simple correction before the policy can be adopted.

Issue 17 – Concerns that the Council's proposed approach to the historic environment as set out in Policy EH7 and the supporting text is insufficiently positive and also inconsistent with national policy set out in the NPPF.

Council's Response:

The wording of this policy has evolved throughout the local plan process, from when initially it was felt that the NPPF and the associated practice guidance was sufficient (i.e. that a local policy did not add any clarification or additional value) through to the Proposed Modified Policy EH7 which reflects representations from, in particular, the CPRE and Historic England. It would appear that further amendments may be required on the wording of this policy which the Council is willing to consider further through the examination process.

4. Summary of Main Issues Raised (Local Plan Section 9 – Strategy at the Local Level)

- 4.1 This section of the report provides a summary overview of the main issues raised through the consultation in relation to Section 9 of the Local Plan – Strategy at the Local Level. This is the longest section of the plan and includes all of the proposed site allocations. As such it has attracted the largest number of comments. Many of these comments raise various concerns about the Council's proposed site allocations.
- 4.2 Given the volume of comments received it is not possible to summarise all of the issues that have been raised and the focus is on issues of particular importance to the 'soundness' of the plan including a number of recurring issues that have been raised by multiple respondents.
- 4.3 A complete, composite schedule of all comments received is available separately and will be submitted to the Inspector together with copies of the representations themselves.

Witney Sub-Area

- 4.4 The majority of comments received related to the four proposed site allocations. These are summarised below together with the Council's preliminary response followed by a brief summary of a number of other general issues raised.

East Witney Strategic Development Area (SDA) – Policy WITI

Issues Raised: Problems of land assembly in terms of the land needed to deliver the Shores Green Slip Roads (SGSR) and related doubts raised about the ability to commence development by 2021. Concern that landscape and heritage impact not sufficiently considered with a lack of evidence to substantiate the proposed increase in dwelling numbers, some concerns about the amended policy wording which weakens the approach to delivery of the SGSR. Issue of potential flood risk also raised by some respondents.

Proposed changes broadly supported by the landowner although a view expressed that the number of dwellings could be further increased. Proposed changes supported by the main bus operator and also Historic England regarding additional references made to the historic environment.

Council's Response:

The Council acknowledges that there are a number of issues to be resolved in order for the East Witney SDA to come forward. None of these issues are however considered to be insurmountable and the Council remains committed to the delivery of this important strategic site. The Council's housing trajectory assumes that development will take place from 2021 onwards and this timescale is considered reasonable. The relatively modest increase in dwelling numbers on the site is considered to be appropriate and justified. The merits of the site will be further considered through the examination process and the Council will be pleased to assist the Inspector as required.

North Witney Strategic Development area (SDA) – Policy WIT2

Issues Raised: Concerns about the proposed increase in the scale of development, questions raised regarding viability having regard to infrastructure costs, scale and complexity of the site will mean a long lead-in time and potential inability to deliver in full by 2031, potential landscape and heritage impact, lack of evidence to substantiate the proposed increase in number of dwellings, concern that the proposed changes have weakened the Council's position regarding delivery of the West End Link (WEL) concern from main bus operator about ability of the site to be effectively served by public transport, concerns about traffic impact with additional clarification sought in relation to the evidence base, urbanisation between Witney and Hailey, conflict between scale of proposed increase with the objectives and policies of the plan, clarity sought about the proposed extent of the site boundary, concern about the lack of detail/clarity provided regarding off-site drainage infrastructure, increased flood risk, some suggestions that the site should be replaced with land at South Witney, increase in dwelling numbers no longer needed due to other permissions granted in the Witney area, ecological impact, increased recreational pressure, questions raised about the benefits of the WEL and concern about increased traffic displacement, rat-running and foul water drainage.

Supported by the landowner but concerns expressed about the proposed requirement for self-build and a suggestion that further consideration be given to potential funding mechanisms for infrastructure e.g. CIL, S106. Support from Historic England for the additional references made to the historic environment.

Council's Response:

The Council acknowledges that the North Witney SDA is a complex site and that there are a number of issues to address in order for development to come forward. The scale of proposed increase from 1,000 to 1,400 homes is significant and it is unsurprising that a large number of comments have been submitted raising various concerns.

As is the case with the East Witney SDA the Council does not consider that any of these issues are insurmountable. The Council's housing trajectory assumes that the majority of development will come forward after 2021 and this is considered to be reasonable. It is also considered realistic to expect development of the site to be complete by the end of the plan period – 2031.

The merits of the site will be further considered through the examination process and the Council will be pleased to assist the Inspector as required.

Woodford Way Car Park – Policy WIT2a

Issues Raised: The site cannot be considered as reasonably available and should therefore not be allocated, concern about the loss of parking, flood risk and impact on heritage assets.

Council's Response:

This is a previously developed site close to the centre of Witney. The principle of development has also been established through a previous planning permission. Whilst not currently available it is reasonable to suggest that the site will come forward within the plan period either for housing or as part of a mixed use development including housing.

As part of any application, thorough consideration would be given to the issue of parking availability as well as flood risk although only a very small proportion of the site is located within the floodplain.

Land west of Minster Lovell – Policy WIT2

Issues Raised: Concerns raised regarding the discrepancy between the Local Plan and current planning application on the site. Support from landowner.

Council's Response:

Since the proposed modifications were published the site has secured a resolution to grant planning permission subject to a legal agreement in relation to the construction of 85 dwellings.

Other General Issues Raised:

- **Various omission sites promoted by landowners/developers.**
- **Support for the additional references made to the historic environment.**
- **Concern about the lack of a playing pitch strategy**
- **Objection to identification of land west of Downs Road as area of long-term potential – not properly tested and also concern about coalescence with Minster Lovell. Support from landowner but a view that the site can come forward in the shorter term.**
- **Suggestion that additional employment should instead be provided to the east of the town.**

Council's Response:

The Council does not consider that any additional sites need to be identified within the Witney sub-

area at this point in time.

The support expressed for the additional references made to the historic environment is noted and welcomed. The Council does have a playing pitch strategy in place.

Land to the west of Downs Road is not formally allocated but has been identified as having potential for long-term growth beyond 2031. The site will need to be considered against other reasonable alternatives in due course. The Council does not consider it should come forward in the short-term.

The potential provision of additional employment land at Witney including to the east of the town would need to be considered as part of any Local Plan review.

Carterton Sub-Area

- 4.5 The majority of comments received related to the four proposed site allocations. These are summarised below together with the Council's preliminary response followed by a brief summary of a number of other general issues raised.

REEMA North and Central – Policy CA1

Issues Raised: General support for the principle of development with some views expressed that more housing could be accommodated through higher density development. Allocation supported by main bus operator. Opportunities to create new green infrastructure highlighted.

Council's Response:

The REEMA sites comprise previously developed land in the central area of Carterton, the District's second largest town. The principle of residential development has also previously been established on the sites. Support for their redevelopment has been expressed throughout the preparation of the Local Plan and the Council will continue to work with the relevant landowners to bring the sites forward. This will include consideration of any potential increase in the number of new homes able to be accommodated across the two sites.

Land at Milestone Road – Policy CA1a

Issues Raised: Mixture of support and objection. The site should incorporate provision for the elderly and with increased density could accommodate more units, however some concerns raised about the impact of increased density and also land assembly and the ability to deliver housing within the plan period. Support from the landowner who has confirmed are working up a scheme for 250 units. Opportunity to contribute towards green infrastructure highlighted as well as the need to consider indirect impact on Alvescot Meadows. Some concerns about potential noise from airfield, traffic impact and impact on residential amenity as well as pressure on infrastructure,

Council's Response:

The principle of residential development on this site has previously been established through planning permission. Whilst land assembly problems have contributed to a delay in bringing the site forward it is reasonable to expect development to take place within the plan period – 2031.

Any potential development would need to take account of the various issues raised including noise, traffic impact and residential amenity but none of these issues are considered to be insurmountable.

Land at Swinbrook Road – Policy CA1b

Issues Raised: Concerns expressed about land assembly therefore the site cannot be relied upon as an allocation. Support from main bus operator.

Council's Response:

The proposed allocation has attracted relatively few comments presumably as a result of the principle of residential development having been previously established on the site. Whilst land assembly problems have contributed to a delay in bringing the site forward it is reasonable to expect development to take place within the plan period – 2031.

Other General Issues Raised:

- **Support for the increased emphasis on regeneration within Carterton e.g. through use of additional MOD land.**
- **Carterton is a main service centre and yet has been overlooked. Recent job growth linked to RAF Brize Norton not taken into account and should be addressed through the provision of an additional strategic site particularly given the relatively low cost of housing, lack of constraints and support locally from the Town Council for additional growth. Alternative sites identified to the west, north and north east of the town.**
- **Support for the decision to not allocate land west of Carterton from a number of residents in the form of a standardised response.**
- **Other additional allocations required within the sub-area as a whole with various omission sites suggested.**
- **Carterton Masterplan not taken into account although some parties question the status of the document**
- **Concern about lack of clarity regarding additional employment land provision and the fact that whilst the plan aims to provide an additional 10 ha of employment land no site is allocated other than existing playing field land a replacement for which has not yet been identified. Also concern about associated loss of pitches.**
- **Concern about delivery of west facing slip roads at junction of Minster Lovell Road/A40**

- **Support from Historic England for the additional references made to the historic environment.**

Council's Response:

The support expressed for the further potential use of MOD land is noted and welcome. The Council will continue to engage with the relevant parties as appropriate.

In terms of potential additional sites within the sub-area the Council does not consider it necessary at this point in time to identify any additional allocations over and above those already proposed.

The plan acknowledges that options for further strategic growth on the edge of the town will need to be considered through any plan review. The same principle applies to the potential need for additional 'non-strategic' allocations.

Whilst the Carterton masterplan identifies the potential for growth on the edge of the town it carries limited weight.

The comments regarding employment land provision are acknowledged and will need to be further considered through the examination process.

The proposed wording change regarding west facing slip roads at the A40 junction with the Minster Lovell Road was made in response to comments received from the County Council as highway authority.

The support from Historic England is noted.

Chipping Norton Sub-Area

- 4.6 The majority of comments received related to the one proposed strategic site allocation to the east of Chipping Norton. These are summarised below together with the Council's preliminary response followed by a brief summary of any other general issues raised.

Land East of Chipping Norton Strategic Development Area (SDA) - Policy CNI

Issues Raised: Concern about the scale of proposed growth in terms of impact on local infrastructure (e.g. education, foul water drainage) traffic and parking, road safety, air quality, lack of local employment opportunities and associated out-commuting. Doubts regarding the need for and benefits of an eastern link road, lack of evidence to support the proposed increase (e.g. landscape impact and heritage impact), lack of consideration of reasonable alternatives including sites at other towns, impact on the character of the town, conflict with the Local Plan vision and core objectives (e.g. avoiding significant change to the character of the District) and conflict with the adopted Chipping Norton neighbourhood plan. Also issues of land assembly in relation to the allotment land south of the site owned by the Town Council as well as the potential loss of allotments. Questions raised about the capacity of the site to deliver 1,400 new homes and delivery within the plan period. Impact on conservation target area, complex land assembly and deliverability.

Support from main landowners but clarity requested in relation to the provision of the proposed eastern link road.

Council's Response:

The proposed changes seek to increase the number of homes significantly from 600 to 1,400 through an increase in the extent of the SDA boundary. It is therefore unsurprising that a large number of comments have been received and that these raise a number of concerns.

As with the other strategic development areas, the issues raised are however not considered to be insurmountable. The Council remains of the view that this larger site proposal offers the potential to deliver a number of significant benefits for Chipping Norton including a potential eastern link road.

There is already active landowner/developer interest and the Council considers that delivery within the plan period to 2031 is perfectly achievable.

The Council acknowledges the fact that Chipping Norton has an adopted neighbourhood plan but does not consider there to be a direct conflict with the current proposal.

The merits of the site will be further considered through the examination process and the Council will be pleased to assist the Inspector as required.

Other General Issues Raised:

- ***Insufficient housing provision being made to meet the indicative requirement. In particular, a lack of housing provision in the short-term due to the lead-in time associated with the East Chipping Norton SDA. Therefore additional sites should be identified within the sub-area.***
- ***Various omission sites promoted.***

Council's Response:

The Council considers that adequate provision for housing has been made in the Chipping Norton sub-area through a combination of past completions, existing commitments, the proposed East Chipping Norton SDA and anticipated windfall. The current commitments will help to assist housing delivery in the short term together with any potential windfall development and the SDA will help to sustain the delivery of new homes within the sub-area to the end of the plan period – 2031.

The Council does not consider that any additional sites need to be identified within the Chipping Norton sub-area at this point in time.

Eynsham – Woodstock Sub- Area

- 4.7 The majority of comments received related to the eight proposed site allocations. These are summarised below together with the Council’s preliminary response followed by a brief summary of any other general issues raised.

West Oxfordshire Garden Village Strategic Development Area (SDA) – Policy EW1a

Issues Raised: Lack of proper consultation, concern about the proposed scale of growth, disproportionate and potentially devastating effect on Eynsham, failure to take account of existing uses within the site including aggregate recycling operation, impact on listed buildings at City Farm, flood risk, lack of separation from Eynsham whereas garden villages are intended to be separate, potential impact of development on endangered and vulnerable arable plantlife, likely archeological remains, would rely on oversubscribed secondary school places and medical facilities in Eynsham, mixed views received on the proposed science park with some support and some objections. Potential for development to compete with rather than complement facilities in Eynsham, concern about potential impact on existing footpaths and bridleways, concern about potential market saturation in combination with land west of Eynsham and the ability to deliver the required number of homes by 2031. Alternative garden village proposal put forward near South Leigh.

Some views expressed that the quantum/extent of development should be increased to enable land west of Eynsham to be reduced in scale/held in reserve.

Council’s Response:

The scale of proposed growth is significant and it is unsurprising that a large number of comments have been received raising a variety of different issues. Having reviewed the various issues raised the Council considers that these are all matters which can be robustly addressed through the planning process. As set out in the Local Plan the Council’s intention is to prepare an Area Action Plan for the garden village which will enable the main issues outlined above to be considered in detail and addressed as appropriate through the masterplanning of the site.

Importantly since the proposed modifications were published for consultation the Council has been awarded garden village status by Government. This funding will be used to support the planning of this strategically important development. Whilst it is likely to be challenging the Council does not consider that the delivery of 2,200 dwellings by 2031 is unrealistic.

The Council does not support the alternative garden village proposal that has been put forward near South Leigh.

West Eynsham Strategic Development Area (SDA) – Policy EW1b

Issues Raised: Allocation not in accordance with spatial strategy, traffic impact, development could instead be provided through larger allocation on land to the north of Eynsham with land to the west held in reserve and reduced down from 1,000 homes, multiple landowners likely to inhibit delivery, if development is to take place it should be restricted to north of the Chilbrook, need to consider a cycle path to the nearby Toll Bridge, concern that proposed link road will slow traffic on the A40, concern about potential impact on local services and

facilities (e.g. health and education) mixed views about the potential benefits of a western bypass for Eynsham with some support and some objections, conflict with Neighbourhood Plan which identifies this area as a reserve site for just 600 homes, distance from village centre, impact on A40 which is already congested, potential impact on scheduled monument raised as a concern by Historic England, also site abuts the Conservation Area. Potential biodiversity/ecological impact of development as well as flood risk.

Council's Response:

The scale of proposed growth is significant and it is unsurprising that a large number of comments have been received raising a variety of different issues. Having reviewed the various issues raised the Council considers that these are all matters which can be robustly addressed.

As set out in the Local Plan the Council's intention is to prepare an Area Action Plan which will enable the main issues outlined above to be considered in detail and addressed as appropriate through the masterplanning of the site.

Whilst the emerging Eynsham Neighbourhood Plan identifies a lower quantum of housing and seeks to hold the site in reserve, the plan carries limited weight at present having yet to be considered through independent examination.

Land East of Woodstock – Policy EW1c

Issues Raised: Previous local plan inspector considered development to be unacceptable, lack of evidence to support allocation, distance from town centre, proximity to Blenheim Palace WHS, overdevelopment of the site compared with SHLAA assessment, incursion into open countryside, traffic impact, impact on local infrastructure, noise from Oxford London Airport, increased recreational demands on Old Woodstock Line nature reserve and Woodstock Water meadows, proposals do not take account of potential growth on adjoining land in Cherwell District, need to consider potential impact on Blenheim Park SSSI.

Council's Response:

Since the proposed modifications were published the site has secured resolution to grant outline planning permission for 300 new homes.

Land north of Hill Rise Woodstock – Policy EW1d

Issues Raised: Loss of playing field and children's play area, lack of local infrastructure, distance from town centre, poor pedestrian and cycle links, primary school already over-capacity, concerns about access arrangements, traffic impact, loss of countryside, impact on public right of way, potential impact on Blenheim Palace WHS, impacts on local amenity, potential conflict with current bus turning arrangements, existing parking problems in Woodstock, pollution levels on the A44, impact on established local community.

Council's Response:

The comments are noted and raise a number of issues that require careful consideration to enable the site to be brought forward. The Council considers that the substantive issues can be addressed through appropriate siting, design and layout as well as developer contributions and remains of the view that the site is suitable in principle for residential development.

In terms of potential impact on the Blenheim WHS, Historic England have not raised concerns in this regard. Furthermore the County Council as highway authority have not raised objections on highway grounds.

Land north of Banbury Road Woodstock – Policy EW1e

Issues Raised: Traffic impact and access arrangements, site beyond reasonable walking distance from centre, lack of public transport, proximity to and impact on the setting of Blenheim Palace World Heritage Site as well as listed buildings, rejected by previous Local Plan Inspector, impact on the character of the town, concern about impact on infrastructure (e.g. education) lack of town centre parking, potential hydrological issues relating to Glyme Valley and downstream the Queen Pool SSSI and Woodstock Water meadows, incursion into open countryside, loss of open space, loss of public views, need to take account of any potential impact on Blenheim Park SSSI.

Council's Response:

The comments are noted and raise a number of issues that require careful consideration to enable the site to be brought forward in particular proposed access arrangements and traffic impact. The Council considers that the substantive issues can be addressed through appropriate siting, design and layout and developer contributions and remains of the view that the site is suitable in principle for residential development.

Notably in terms of potential impact on the Blenheim WHS, Historic England have not raised concerns in this regard.

Land at Myrtle Farm, Long Hanborough – Policy EW1f

Issues Raised: Some doubts expressed about deliverability in terms of land ownership, potential impact on heritage assets, concern about restricted access, impact on the setting of the AONB to the north, potential threat from increased recreational use of nearby Pinsley Wood, various concerns raised by previous Local Plan Inspector, general concern raised about level of growth taking place at Long Hanborough.

Council's Response:

The Council understands there to be no constraints to development in terms of land ownership and considers that the other issues raised can be addressed through appropriate siting, design and layout.

Oliver's Garage, Long Hanborough – Policy EW1g

Issues Raised: Potential impact on heritage assets, site should be treated as 'windfall' rather than a site allocation, potential threat from increased recreational use of nearby Pinsley Wood, potential for bat roosts in existing buildings.

Council's Response:

The proposed allocation has attracted very few comments and the Council remains of the view that it represents a sustainable development opportunity. The Council does not consider that the site needs to be treated as an unidentified windfall site. The other issues raised are capable of being addressed through the planning application process.

There is a current planning application on the site for 25 dwellings – pending determination.

Former Stanton Harcourt Airfield – Policy EW1h

Issues Raised: Concern about the lack of a regular bus service, heritage considerations highlighted by Historic England, ecological considerations highlighted including potential for bat roosting in existing buildings, proximity to SSSI.

Council's Response:

Since the proposed modifications were published the site has secured a resolution to grant planning permission subject to a Section 106 legal agreement.

Other General Issues Raised:

- **Concern about proposed downgrading of Long Hanborough**
- **Concern about impact of proposed growth on historic character of Woodstock**
- **Further consideration should have been given to meeting Oxford's unmet needs at locations other than just Eynsham**
- **Concern about having to accommodate Oxford City's 'overspill'**

Council's Response:

The Council's response to the concerns regarding Long Hanborough were set out previously in Section 3.

The concerns regarding the potential impact of growth on the historic character of Woodstock are noted. The Council fully acknowledges that this is a key consideration but it must be balanced against the identified need for new homes and Woodstock is one of the most sustainable settlements in the

District in terms of available services and facilities.

Notably, Historic England have not raised any significant objection to the proposed quantum of development at Woodstock or any of the individual site allocations (one of which now has a resolution to grant outline planning permission).

In terms of Oxford's unmet needs, the decision to focus growth at Eynsham is based on a robust evidence base that has considered a number of reasonable alternatives including sites at Barnards Gate and Witney. Land at Eynsham is demonstrably the best performing of the options considered.

Whilst the concerns about accommodating additional housing from Oxford are understandable, the District Council has agreed in accordance with the duty to co-operate to assist its neighbour in meeting its identified housing need. This is consistent with the Local Plan Inspector's preliminary findings which suggested that in undertaking any further work the Council would need to take into account any apportionment of unmet housing need from Oxford City.

Burford – Charlbury Sub-Area

- 4.8 The majority of comments received related to the four proposed site allocations. These are summarised below together with the Council's preliminary response followed by a brief summary of any other general issues raised.

Land North of Woodstock Road, Stonesfield – Policy BC1a

Issues Raised: Concern in terms of the AONB location, disproportionate and cumulative impact of growth, the potential for adjoining land to also be developed, the lack of local employment opportunities, affordability of new homes, impact on local amenity including recreational facilities, strain on local infrastructure e.g. primary school, lack of consultation and lack of local services and facilities.

Council's Response:

The comments are noted and raise a number of issues that require careful consideration to enable the site to be brought forward. The Council considers that the substantive issues can be addressed through appropriate siting, design and layout and remains of the view that the site is suitable in principle for residential development.

Land East of Burford – Policy BC1b

Issues Raised: Large number of objections on the grounds of location within the AONB, impact on rural character, lack of public consultation, landscape impact, harm to key views including from the A40, heritage impact, light pollution, site access including site gradient, traffic impact, surface water run-off, flood risk, topography, impact on tourism and local infrastructure (e.g. education) as well as the availability of other alternative sites outside the AONB.

Council's Response:

The Council accepts that this is a sensitive site that requires careful consideration particularly with regard to landscape and visual impact, access and potential heritage impact. The Council considers that the substantive issues can be addressed through appropriate siting, design and layout. There are very few suitable options available at Burford and the Council remains of the view that the site is suitable in principle for residential development.

Land North of Jeffersons Piece, Charlbury – Policy BC1c

Issues Raised: Location within the AONB and Conservation Area, traffic impact, lack of a suitable site access, impact on local infrastructure (e.g. education) overdevelopment, landscape and visual impact, harm to key views, loss of wildlife, impact on local amenity, deliverability, lack of local services and facilities, conflict with emerging Neighbourhood Plan, lack of public consultation. Support from landowner.

Council's Response:

The comments are noted. Whilst a number of issues have been raised and require careful consideration in particular traffic impact, access arrangements and heritage, none of these are considered to be insurmountable. The emerging neighbourhood plan is at an early stage and therefore carries little weight. The Council remains of the view that the site is suitable in principle for residential development.

Land South of Milton Road, Shipton under Wychwood – Policy BC1d

Issues Raised: Concern about overdevelopment, lack of local services and facilities and potential coalescence.

Council's Response:

Since the proposed modifications were published this site has secured a resolution to grant planning permission subject to a Section 106 legal agreement.

Other General Issues Raised:

- **Suggestions that additional provision should be made for housing with various 'omission sites' promoted as potential site allocations to assist with housing land supply.**
- **Concern about the availability of public transport within the sub-area and the ability to serve new development.**

Council's Response:

The comment regarding the availability of public transport is noted. This is an issue that has become more acute following the withdrawal of a number of bus subsidies in July 2016. The Council has therefore sought to allocate sites that have access to available bus services.

At this point in time the Council does not consider that additional site allocations need to be identified.

5. Next Steps

- 5.1 This consultation summary report will be submitted to the Inspector as part of a package of documentation to help inform the Local Plan examination and consideration of the proposed Local Plan modifications.