

**WEST OXFORDSHIRE DRAFT LOCAL PLAN
CONSULTATION 7TH NOVEMBER – 19TH DECEMBER 2012**

SUMMARY OF RESPONSES

Plan Section	Main Issues
Vision and Objectives	Generally well supported. Suggested changes include a greater emphasis on meeting housing needs, in particular in the rural areas, providing a clearer economic strategy, in particular for Carterton and increased emphasis on biodiversity and the historic environment. Some respondents consider that parts of the vision and objectives are not adequately translated through the rest of the plan.
Overall Strategy	
Presumption in Favour of Sustainable Development	Generally well supported although some consider that the model wording recommended by the Planning Inspectorate should be used instead of the slightly modified version set out in the plan.
Locating Development in the Right Places	<p>Generally well supported although mixed views expressed regarding the proportion of growth to be directed to the three main towns compared to the rest of the District.</p> <p>Some support the proposed strategy others would like to see more housing in the rural parts of the District. Conversely, others are concerned about more housing in the rural areas with some parties calling for Witney to take an increased share of growth as the District's principal town.</p> <p>A further key issue raised by a number of respondents is the lack of detail in the plan regarding the location of new development in the rural areas and a concern about relying on neighbourhood plans to deliver growth in these areas.</p>
Prudent Use of Natural Resources	Generally well supported although concerns have been raised by the development

	<p>industry regarding the cost implications of the policy which it is argued could render development unviable. It is also argued that the Council should not be seeking to impose voluntary standards through the local plan.</p>
High Quality Design	<p>The policy has been well-received with no objections, good support and a number of minor observations.</p>
Supporting Infrastructure	<p>Generally well supported. Two key issues emerge from the responses. The first is viability and a concern that the requirements placed on developers and landowners should not be so great that they render development unviable.</p> <p>The second key issue is A40 congestion and the impact of further growth.</p>
<p>Providing New Homes</p>	
Amount and Distribution of Housing	<p>In terms of the level of housing proposed, a large number of comments have been received setting out a range of different views. Some respondents object to the target on the basis that it is too high and would 'over-provide' compared to what will actually be needed.</p> <p>Others, including in particular the development industry, object because the target is too low. The primary reasons cited are that the proposed target would fail to meet identified housing need and demand, is not based on an objective assessment of need and demand and would fall well below household projections, previous structure plan requirements and historic rates of housing delivery in the District. It is also argued that the implications of higher growth have not been adequately tested, that the housing target should not be based on the South East Plan and that the proposed target does not represent the 'significant boost' to housing supply required by the National Planning Policy Framework (NPPF).</p> <p>It should be noted however that the call for higher growth is not unanimous within the development industry, with a number of respondents either expressing support for the current target or raising no objection to it.</p>

	<p>In terms of the distribution of housing, again mixed views have been expressed. At Witney, strategic site promoters to the east and north of the town have called for increased housing for Witney and there have been similar calls from the development industry for increased growth at Chipping Norton, Woodstock, Long Hanborough, Eynsham and Bampton.</p> <p>Conversely, a number of respondents have expressed concern about increased growth in these locations with a particularly large volume of responses received in the form of a standard objection to further growth at Woodstock.</p> <p>A recurring theme is the need for greater detail concerning the amount and location of housing expected in the rural areas.</p>
Type and Mix of New Homes	<p>The policy has attracted relatively few comments and these are of a generally supportive nature. There have been requests for greater clarification in relation to the issue of self-build and meeting the needs of older people outside of the District's main towns. The point has also been made that Neighbourhood Plans should be allowed to determine housing mix at the local level.</p>
Affordable Housing	<p>The policy has attracted support from some parties with concerns raised by others (primarily developers and landowners) on a number of grounds. Firstly, the lack of justification for the different targets identified in the policy including concerns that the 50% target will impact on development viability. Concerns have also been expressed that the adoption of a low, single dwelling threshold will inhibit the delivery of housing in the rural areas as the current, adopted policy of 2 dwellings is considered to have done in recent years. Other comments include the need to raise the threshold for on-site provision, the need for greater flexibility and that if the proposed approach is to be taken forward, that any commuted sum must be reasonable and weighted according to house size.</p>
Existing Housing	<p>The policy has attracted very few comments and these are generally of a supportive</p>

	nature in particular support for the re-use of empty homes. There have been some requests for further clarification and also a suggestion that residential annexes should be made available for rent on the open market.
Travelling Communities	The policy has attracted relatively few comments but a number of important issues have been raised including the need to ensure that the plan is based on an objective assessment of need, includes pitch targets (both permanent and transit) and identifies a five year rolling supply of traveller sites. The lack of transit site provision in West Oxfordshire has also been highlighted.
Sustainable Economic Growth	
Overall Economic Strategy	One of the general issues raised in response to the plan is that it does not provide an economic 'vision' of sufficient detail to bring focus to bear on the District's economic assets and economic potential.

Land for Business	<p>A relatively small number of comments have been received on this policy. With specific regard to Carterton, both the Town Council and Carterton Fast Forward suggest that additional business land should be provided in order to diversify the economic base and reduce out-commuting. Conversely, other respondents have drawn attention to vacant business land in the town which could suggest a potential lack of demand/need.</p> <p>At Witney, the East Witney Land Consortium proposes a business park on land off Jubilee Way to provide more balanced economic growth.</p>
Supporting the Rural Economy	<p>The policy attracted relatively few comments and those received were of a generally supportive nature with no substantive issues being raised subject to some suggested wording changes for clarification.</p> <p>As part of wider representations, the Blenheim Estate state that the policy does not have a wide enough scope and are seeking a specific policy for the estate.</p>
Re-Use of Non Residential Buildings	<p>The policy attracted relatively few comments although concerns have been expressed that the policy (in prioritising economic uses) is out of line with the NPPF which adopts a more flexible approach to the re-use of buildings.</p>
Sustainable Tourism Economy	<p>The policy received some support but also objections seeking more reference to the tourism value of walking and cycling and more detailed policies in relation to the Lower Windrush Valley and also the Blenheim Estate.</p>
Retention and Development of Local Services and Community Facilities	<p>The policy received relatively few comments and these were of a generally supportive nature subject to further guidance on appropriate marketing and also further consideration of the interaction with the 'Community Right to Bid' legislation.</p>

Town Centres	A few varied comments were received including support for the new local impact threshold but also that the primary shopping frontage policy should be expanded to include restaurants and cafes as well as shops. Charlbury Town Council objects to the lack of specific reference to Charlbury given the previous loss of shops that has occurred. Objections have also been received in relation to the requirement for development to make provision for additional parking as it is considered that this would run counter to policies to reduce congestion.
Environmental & Heritage Assets	
Landscape Character	Overall, there has been general support for this approach, including from English Heritage and Natural England. Others have provided useful observations which, with minor alterations, will strengthen the plan. Some objections have been received and these relate mainly to the lack of detailed survey and assessment of landscape and the policy being too generic in nature.
Biodiversity	Natural England strongly supports the proposed approach and other respondents have expressed support also. Objections have been received from the development industry about the need for new development to 'enhance' biodiversity. Specifically in relation to the Lower Windrush Valley, Oxfordshire County Council is concerned that there is no overall vision for the area.
Public Realm and Green Infrastructure	The policy has been generally well supported although there have been some concerns from the development industry that the policy imposes an unacceptable and onerous requirement. Other objections have drawn attention to the need for a robust needs assessment e.g. of sports and recreational buildings, youth facilities and cemeteries.
Decentralised, Renewable and Low Carbon Energy Development	The policy has been generally well supported. The main issue of concern relates to viability and the impact that the 10% renewable energy requirement will have on scheme deliverability.
Water and Flood Risk	The policy has attracted a large number of comments, mainly in support including the

	Environment Agency and Natural England. Those objecting are essentially seeking further details and requirements to be included in the plan.
Environmental Protection	The comments received are of a generally supportive nature with some suggested minor amendments for clarification and strengthening of the policy. The environmental impact of RAF Brize Norton has been highlighted by some respondents as well as the need to more fully address issues of air quality in Witney and Chipping Norton.
Minerals and Waste	The draft plan does not include a policy on minerals and waste but does include some supporting text. A number of comments have been received including objections to the level of detail included, the fact that the plan should not include any reference to future locations for minerals working (because this is the responsibility of the County Council) and the need for a more detailed policy framework, setting out the principles guiding development.
Historic Environment	<p>English Heritage and Oxfordshire County Council generally support the section on the historic environment but have suggested a number of ways in which the text and policy can be strengthened. In particular, English Heritage believe that while the policy may be adequate as a strategic policy, a more detailed approach is required in order to ensure the conservation, enjoyment and enhancement of the historic environment. A number of developers argue that the policy is not in accordance with the NPPF.</p> <p>The Blenheim Estate object to the omission of a specific policy relating to the Blenheim Palace World Heritage Site (WHS) which they argue would create a positive planning policy framework to assist in the implementation of the maintenance and restoration of the site.</p>
Transport and Movement	
Transport and Movement	<p>A large number of comments have been received from which a number of key themes emerge.</p> <p>An overarching concern is the capacity of the A40 to accommodate further growth</p>

	<p>with attention drawn to congestion between Witney and Oxford in particular and the impact on amenity and the local economy.</p> <p>A number of comments have been received in relation to the proposed Shore's Green junction at Witney, both in support and against. South Leigh Parish Council is concerned about the impact of the scheme and Crawley Parish Council and Freeland Parish Council have both expressed their support for the West End Link in preference. The potential park and ride scheme has met with mixed reaction and there has been good support for the proposed improvements around Ducklington Lane.</p> <p>At Carterton, support has been expressed for the improvement of links to the town. The Town Council would like to see the policy strengthened and have suggested a number of further transport improvements including a 4 way access onto the A40 at Minster Lovell. Elsewhere, attention has been drawn to the environmental impact of HGVs in Burford, the Bartons and Chipping Norton and the issue of parking for tourists at Woodstock.</p> <p>As a general observation a number of respondents argue that the policy lacks focus and needs to be more specific about proposed improvements with various schemes suggested.</p>
<p>Strategy at the Local Level</p>	
<p>Witney Sub-Area Strategy</p>	<p>One of the main issues raised is traffic and a concern that additional growth at Witney will worsen existing problems of congestion within the town. As set out above, mixed views have been expressed on the relative merits of Shore's Green and the West End Link but there is an overall concern that more growth is likely to mean more congestion.</p> <p>The impact of growth on other local infrastructure such including schools, leisure and health facilities has also been highlighted as a key area of concern. Other issues raised</p>

	<p>include flood risk and the need to protect and expand existing areas of open greenspace, including the Lower Windrush Valley and the importance of protecting the setting of the town and its impact on the surrounding countryside and villages.</p> <p>The promoters of land at West Witney and East Witney both support the proposed strategic development areas although the promoter of the eastern site is seeking an increase from 300 to 450 homes (see East Witney Strategic Development Area below).</p> <p>The promoters of land at North Witney object to the omission of their site from the plan on a number of different grounds. This includes the fact that Witney should take a greater proportion of housing growth than is currently proposed, that a smaller release of land to the north has not been fully considered and that the concerns expressed by the Council regarding flood risk, landscape and ecological impact can be overcome. They also state that the northern option is deliverable and would include provision of the West End Link. It is also argued that the proposal at East Witney will worsen air pollution in Bridge Street.</p> <p>Minster Lovell Parish Council strongly objects to the proposed strategy and, in particular, the environmental consequences; eroding the gap between the two settlements and causing a deterioration in the quality of life, visual, light and noise pollution.</p> <p>Hailey Parish Council supports the plan and emphasise their continued objection to any development on the northern side of Witney; encroachment on the gap and damage to the rural character of the area.</p>
Witney Town Centre Strategy	<p>No objections have been received although a number of representations express concern about the loss of the 'small town character' as Witney has grown and the centre has become more congested. In terms of parking provision, different views have been expressed about the need for and impact of additional parking provision. The owners of the Woolgate have raised the possibility of providing a decked car</p>

	park.
West Witney Strategic Development Area (SDA)	<p>Very few comments have been received which is considered to be indicative of a general level of support for this proposal.</p> <p>Concerns have however been raised regarding the impact on the A40, rat-running through Crawley and Curbridge, the impact of the proposed junction on the flow of traffic on the A40 and the need for supporting infrastructure to be in place before development. The site promoter, whilst supportive of the policy has requested a number of minor amendments to the policy in order to provide greater flexibility.</p>
East Witney Strategic Development Area (SDA)	<p>The number of comments received on this policy was relatively small and there were very few objections in principle to residential development in this location.</p> <p>The key concerns raised relate to the proposed Shore's Green junction improvements including the potential environmental impacts the scheme will have and the fact it is a poor substitute for the previous Cogges Link Road scheme. Others are more supportive of the proposal and would welcome its early delivery.</p> <p>A number of concerns have been expressed about the impact of and need for, the potential park and ride site identified as part of the draft allocation. The other main issue raised is flooding both in relation to the area around the Shore's Green junction and also in Eton Close due to surface water run-off.</p> <p>The East Witney Land Consortium wish to see the number of homes increased from 300 to 450. This would be achieved by allowing more housing on the Cogges Triangle site and also releasing a small parcel of land adjacent to the Stanton Harcourt Road. It is argued that the increase in numbers is needed to ensure the scheme is viable.</p>
Carterton Sub-Area Strategy	<p>A large number of comments were received to this policy including from developers promoting alternative sites on the edge of the town.</p> <p>A number of respondents have questioned the proposed level of housing and whether there is a need for a strategic site on the edge of the town, with many commenting</p>

that further consideration should be given to making better use of sites within the town including the redevelopment of areas of MOD housing and vacant commercial sites.

A number of other respondents have raised the lack of employment opportunities and the need for active steps to encourage businesses to the area. Many highlight the town as a dormitory for Witney and Oxford and that employment at RAF Brize Norton has already peaked. Carterton Town Council seek recognition of the dangers of over reliance on the RAF for employment and seek the further allocation of employment land to diversify the economic base, attract aviation related businesses and provide for start up businesses. Foxbury Farm and Burford Quarry have been promoted as potential future employment sites.

Many comments reference a lack of transport infrastructure to support further development with many noting congestion due to commuters on the A40 and increased traffic through villages to the A420. Various road improvements are suggested including improved access to the A40, the Brize Norton bypass (drawing both support and objections), improving the A40 junction at Minster Lovell to 4-way, a Shilton Dip bypass, bypasses to Kencot and Filkins to the west, Carterton to Witney cycle path and a town cycling strategy.

Other infrastructure concerns include the need for fire or ambulance services, more playing pitches and improved leisure facilities, that acreages for burials and allotments are defined and consideration of the need for further medical facilities. In terms of education there is some concern over the need for and impact of a new primary school at East Carterton, given the spare capacity in some existing schools within the town. Comments highlighted that new houses in the Community College catchment area are vital to increasing student numbers but concern has been expressed that the east Carterton site is not within the catchment.

Flooding is a significant concern, particularly for neighbouring villages and downstream villages such as Bampton. Respondents request that further consideration is given to

	<p>this issue to ensure new development does not increase flood risk.</p> <p>Support has been expressed for the protection and enhancement of the Shill Brook valley but further detail is sought on how this will be achieved.</p> <p>Some support has been expressed for the proposed approach in the rest of the sub-area and the scope for parishes to work with the District to progress Neighbourhood Plans. Others have questioned the lack of description, assessment or guidance for other locations in the sub area.</p> <p>There was overall support for the redevelopment of the REEMA MOD sites and significant numbers supporting the east Carterton site should there be a need to expand the town. There were also many objections to the eastern option (see East Carterton SDA below) with some supporting West Carterton as an alternative.</p> <p>Carterton Town Council stated that they are not able to support the proposed development to the east of the town in its current form and consider development to the west to provide the best long term option.</p> <p>A significant number of comments objecting to the Carterton West site were also received, many prompted by a leaflet circulated by the site promoter during the consultation period.</p> <p>There was limited support for significant further expansion to the North.</p>
Carterton Town Centre Strategy	<p>The policy is supported by both the Town Council and Carterton Fast Forward subject to providing further emphasis on supporting existing retailers, design, pedestrian links. Other respondents have highlighted the need for improved pubs and restaurants, coffee shops and leisure facilities. A variety of transport related comments have been received including the issue of queuing traffic in the town centre and the need to reduce the number of lorries particularly when the new Morrisons opens.</p>
East Carterton Strategic Development Area (SDA)	<p>This policy has attracted a large number of comments in particular from residents of</p>

Brize Norton and Bampton but also from the promoters of alternative sites to the north, north west and west of the town. A detailed critique of the Council's Strategic Site Assessment has been submitted by Brize Norton Parish Council.

The key areas of concern raised in the various responses received are as follows:

Flooding and drainage - there is concern about an increased risk of flooding to Brize Norton village and downstream villages notably Bampton with recent instances of flooding in the area. There is concern that the flood mitigation proposals are unclear, need to take into account climate change and that the site is unsuitable for the use of sustainable drainage systems. The sewage network in Brize Norton is noted as unable to cope with demand from additional development with the system being overloaded and flooding during the consultation period.

Coalescence and Separation of Brize Norton Village - many residents highlight that Brize Norton is recorded in the Domesday Book and has dispersed listed farmsteads and Church, suggesting that the development and proposed country park buffer will not maintain the separation and character of the village. Respondents reference current Local Plan policy which seeks to limit urban sprawl and the 2009 Landscape Assessment. Significant visual impact is suggested given the topography of the site and particularly for residents of Burford Road. There is also support that the development is well integrated with the town and the country park buffer will provide additional open space. English Heritage commented that the buffer should ensure development does not adversely affect heritage assets. Further detail on the size of the buffer is also sought.

Traffic and Transport – there is a concern that traffic from the proposed development will route via Brize Norton village to access Witney and also Oxford via the A420 to avoid the congestion on the A40. An increase in traffic on Burford Road to travel west is also highlighted as a concern. Further detail is sought on the road network improvements with suggestions of restrictions, traffic calming and improved footpaths and cycleways along Carterton Road and within Brize Norton village. There is also

support for the development due to its proximity to RAF Brize Norton, new employment areas, doctors surgery and leisure centre and as it has good bus services, and access to the road network with many cars heading east. On the contrary some consider the location in the east as a disadvantage suggesting residents are more likely to travel to Witney rather than use Carterton's facilities.

Environmental Impact of RAF Brize Norton – responses suggest that noise, odour, air pollution and light pollution from the operations of the base create an unacceptable level of amenity for residents in this location. Many residents have noted recent increases in complaints regarding noise from the Hercules C130 engine testing and also suggest that the recent C130 Engine Ground Run Noise Abatement Report indicates development would be subject to an unacceptable level of noise.

Alternative Site Options - the promoters of land to the north of Carterton (Kilkenny Farm) north west (David Wilson Homes) and west Carterton have as part of their submissions, submitted detailed objections to the proposed site at east Carterton. These are summarised below.

The promoters of land at Kilkenny Farm object on the basis that their site is demonstrably better. They draw particular attention to the constraints affecting the eastern site including noise, light pollution, air quality and contamination. They also identify the potential impact of development on Brize Norton village. Because of these constraints they argue that the site would be better suited to business use linked to RAF Brize Norton. They also suggest that to address identified landscape concerns their site at Kilkenny Farm should be considered for 500 – 750 dwellings, potentially in combination with land to the east although their priority for the east is business use. They also question the site assessment process which in their opinion, fails to give adequate weight to the impact of RAF Brize Norton and also fails to test combinations of options.

The promoters of north-west Carterton (David Wilson Homes) consider that the strategy should be amended to identify their site for 300 homes with a corresponding

	<p>reduction of the East Carterton site to 500 homes in order to reduce the impact of coalescence on Brize Norton. They also object to the Council's Sustainability Appraisal which they consider to be flawed.</p> <p>The promoters of land at West Carterton have submitted a detailed objection to the allocation of land to the east on the basis of the soundness of the Council's evidence base. They also question the allocation of land at REEMA North and Central. Their principal concerns are that development at east Carterton would result in unsustainable journeys as a result of the proximity to the A40 and its distance/relationship to the town centre and schools. They also draw attention to inconsistencies between the most recent landscape assessment undertaken in support of the draft local plan and earlier studies in 1998 and 2009.</p> <p>Attention is drawn to the issue of coalescence and the need to maintain the important gap between Brize Norton village and Carterton including the lack of detailed evidence regarding the size and nature of the proposed buffer and the findings of the previous landscape assessments referred to above. Other issues raised include noise from RAF Brize Norton and education including the fact that land to the east would draw pupils away from the town and would not support existing town centre schools. They also question the viability of the eastern development and request further information to demonstrate that the site can be delivered.</p> <p>In relation to their own site to the west, the site promoters question a number of the findings set out in the Council's site assessment. They also state that the Council has not listened to the views of Carterton Town Council and the residents of Carterton and Brize Norton.</p>
REEMA North and Central Strategic Development Area (SDA)	<p>There has been general support expressed for the proposal which will provide housing and enhance the central area of Carterton. Some concerns have been expressed about the deliverability of these sites and the extent to which their redevelopment should count towards the overall housing target. Other respondents argue that the sites have greater capacity than indicated in the plan and that the</p>

	<p>Council should work with the MOD to identify further development opportunities within the Town.</p>
<p>Chipping Norton Sub-Area</p>	<p>Relatively few comments have been received in relation to this policy although a number of key themes emerge. The first is the level of growth proposed with some suggesting that 600 homes is an appropriate target and others suggesting that it should be increased as the lack of school capacity should not be a constraining factor. On a related note, Oxfordshire County Council state in their response that land should be safeguarded in Chipping Norton to provide a third primary school to cater for future growth. Secondary school capacity is considered adequate. The second key issue is a concern from some parties about the reliance being placed on the Chipping Norton Neighbourhood Plan as the primary mechanism for delivering growth in the town. There have also been calls for more action regarding poor air quality in the town and support for the provision of improved bus services.</p> <p>A number of potential development sites have been proposed at Chipping Norton.</p>
<p>Eynsham – Woodstock Sub-Area</p>	<p>A large number of comments have been received, many of which are in the form of a standard letter of objection opposing further development at Woodstock on the basis that the town has already taken its fair share of development and does not have the infrastructure to accommodate further growth. Other Woodstock related issues raised include the need for additional parking and protection of shops.</p> <p>In relation to Blenheim Palace, there have been calls for a specific policy and also for the inclusion of a specific ‘buffer zone’ to protect the palace from inappropriate development. The Blenheim Estate has suggested a number of potential residential sites which they consider should be allocated within the Local Plan on the basis of meeting local needs and also contributing towards the maintenance and restoration of the Blenheim WHS.</p> <p>In relation to Eynsham, mixed views have been expressed about the potential for further development with some objecting to more housing and a number of</p>

	<p>developers proposing housing sites to the west.</p> <p>Other more general issues raised include the need for a greater recognition of transport issues within this area including the potential impact of additional traffic on the A4095, lack of healthcare facilities and the need for a policy addressing the Lower Windrush Valley.</p>
Burford – Charlbury Sub-Area	<p>A very small number of comments were received in relation to this part of the plan.</p> <p>A number of respondents raised the issue of transport including in particular greater recognition of the dangerous conditions for pedestrians, cyclists and equestrians on the rural road network and improvements to encourage sustainable transport such as increasing car parking capacity at Kingham Station to reduce commuting by car.</p> <p>The provision of high speed broadband in the area is considered to be an important factor in retaining home workers and in further supporting the viability of settlements such as Charlbury.</p> <p>There appears to be some desire amongst local communities to prepare neighbourhood and community plans although some concerns about the resources involved and whether there are other alternative mechanisms that could be used.</p> <p>Oxfordshire County Council have requested further information on the distribution of housing within the sub-area however so that the impact on schools can be assessed.</p> <p>Potential development opportunities have been suggested at Milton under Wychwood and Shipton under Wychwood.</p>
Delivery and Monitoring	
	<p>A small number of comments have been received with no major concerns expressed. Some additional delivery partners have been suggested including greater reference to Town and Parish Councils, as well as some additional delivery mechanisms and indicators.</p>
Other General Comments	

A number of general comments have been submitted most of which have already been referenced above. One further issue is the extent to which the Council has fulfilled the 'duty to co-operate' in preparing the plan. This is a legal requirement to work collaboratively on cross-boundary issues.

A number of comments have also been received on the Draft Infrastructure Delivery Plan (IDP) and Sustainability Appraisal (SA) made available alongside the draft local plan as part of the consultation.