



WEST OXFORDSHIRE  
DISTRICT COUNCIL

# East Chipping Norton Strategic Development Area (SDA)

*Supplementary Planning Document (SPD)  
Issues Paper Consultation*

Summary Report  
**June 2019**

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# Introduction

## Background

Land to the east of Chipping Norton is allocated in the West Oxfordshire Local Plan 2031 as a 'Strategic Development Area' (SDA) to accommodate a sustainable, integrated community that forms a positive addition to the town. It is envisaged that the SDA will deliver around 1,200 new homes and 5 hectares of business land together with supporting services and facilities including a new primary school and eastern link road. To help guide the future development of the site, West Oxfordshire District Council (WODC) is preparing a Supplementary Planning Document (SPD) in the form of a Development Framework. The SPD will set out the key objectives and development principles that will need to be addressed as the SDA is taken forward and will be a material consideration in the determination of any future planning applications for the site.

As a first step in the process, the Council published an Issues Paper for a 6-week consultation held between 25 January 2019 and 8 March 2019. The consultation included two public exhibitions held in Chipping Norton on the 5<sup>th</sup> and 25<sup>th</sup> of February 2019 where officers from WODC and Oxfordshire County Council (OCC) were present to discuss the site and future potential opportunities with members of the public. The purpose of the issues paper consultation was to:

- Briefly explain the background to the proposal and how we have arrived at this point;
- Provide an overview of the East Chipping Norton site;
- Highlight the physical and policy constraints affecting the site; and
- Seek initial views on the key issues and priorities to be addressed through the SPD as the site is taken forward.

This summary report provides an overview of the main issues raised through the consultation. 111 responses were received from individuals/residents, local authorities, statutory bodies, town and parish councils, developers/landowners/agents, and other organisations as shown in Figure 1 below.

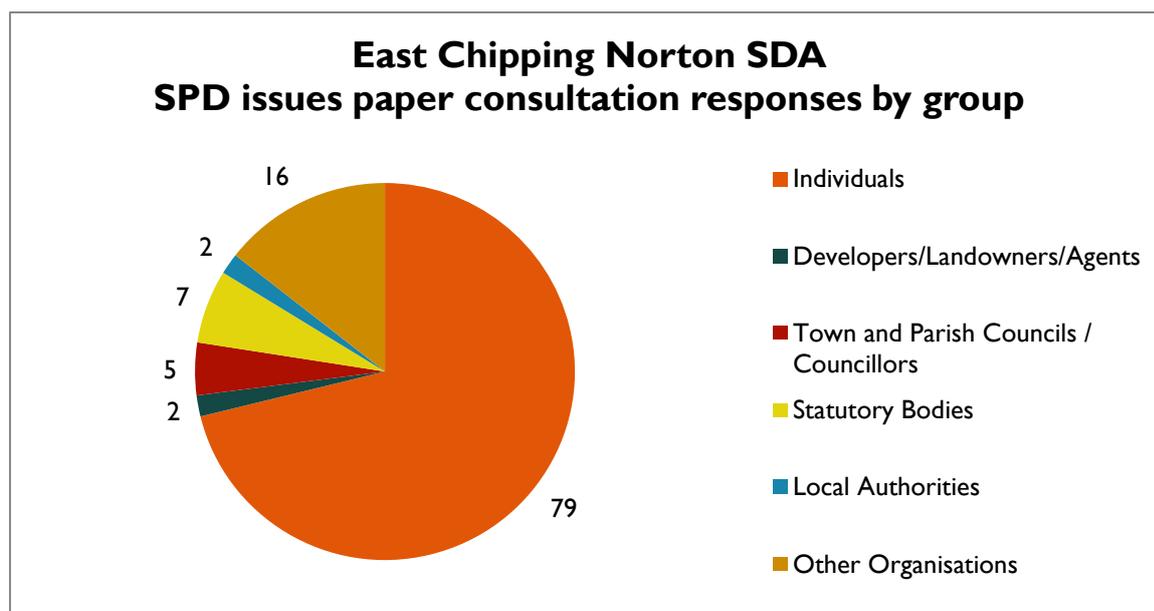


Figure 1 Issues paper consultation responses by group

Representations were submitted by email, post, and in-person at exhibitions. 28 of the responses received were anonymous, most of which were submitted at one of the exhibitions. Responses varied in format, including one video montage, and were a mix of open/themed comments or in direct response to specific questions set out in the issues paper.

The comments received are available online in full.<sup>1</sup>

## Report Content and Structure

This summary report distils the key points raised by respondents to the issues paper consultation. It should be noted that the report aims to identify the main issues raised but does not quantify or weigh responses, nor does it include WODC's views or responses. The points listed are *not* in any hierarchical order.

In terms of structure, the consultation summary report roughly follows the thematic sections of the issues paper; however, a number of new sub-sections have also been included to reflect the range of responses received as part of this consultation. The report is also divided into two parts for clarity. Part One deals with the context and constraints of the SDA whereas Part Two addresses the key issues and opportunities for the SPD. An 'Additional Comments' section has also been included at the end of this report to capture a number of more general responses that were received.

Each section begins with a brief summary of the main issues raised by respondents, followed by a more detailed summary of responses. The responses to specific questions that were posed in the issues paper document have also been included as part of these summaries.

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<sup>1</sup> [https://www.westoxon.gov.uk/media/2017105/East-Chipping-Norton-SDA-Issues-Consultation-Schedule-of-Responses\\_final-to-publish.pdf](https://www.westoxon.gov.uk/media/2017105/East-Chipping-Norton-SDA-Issues-Consultation-Schedule-of-Responses_final-to-publish.pdf)

# **PART ONE**

## Site constraints

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# Background Context

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## Summary of key points raised:

- Recent changes to the local area and developments in the town need to be more carefully considered as part of the SDA context
- Healthcare provision within the town should be included
- Additional details about the existing vacant properties in town should be included
- Information about the timescale of the development and proposed phasing should be included in the background information
- More emphasis should be placed on the town's topography when identifying and describing the SDA context and constraints

The background context section relies on the Chipping Norton Neighbourhood Plan (CNNP) in many places; however, it is noted that the Neighbourhood Plan was written between 2013 and 2015, and adopted in early 2016. As a result, some of the information drawn from the CNNP that has been used to contextualise the East Chipping Norton SDA is outdated. In particular, the recent development context that has included several new housing developments including extra care homes within the town is not adequately considered in the issues paper. Vacant properties within the town centre and the economic changes that underlie them) should also be considered when framing local need in terms of both housing and business space.

The need to further contextualise the East Chipping Norton SDA is also noted. While it is acknowledged that land to the east of the town is the likely direction for the future growth, the SDA also has the ability to facilitate growth further east and beyond the plan period to 2031. Alongside this, comments received from site promoters of fields adjacent to the east of the SDA request that this additional land is considered as part of the SDA.

Relating to the recent developments in the town, the resulting population increase and the ongoing challenges of an ageing population have also impacted on the Chipping Norton Health Centre (CNHC). The existing and projected impacts of the SDA's development on CNHC's capacity therefore require greater emphasis as discussed in more detail elsewhere in this report.

The Chipping Norton Lido is also highlighted as an important community asset in close proximity to the SDA that should be given greater emphasis as it is an important draw for residents and provides and inter-generational, inclusive and family-friendly recreational facility.

The topography of Chipping Norton is also highlighted as steep hills pose challenges to some. While the SDA may be relatively near to the town centre and existing services and facilities 'as the crow flies', the hilly conditions make comfortable access more difficult.

It was also noted that the section would benefit from additional information about the timescale and phasing of the development.

# Site Constraints

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## Summary of key points raised:

- Adjacent uses including the cricket grounds, lido, tank farm farmhouse and the William Fowler allotments and woodlands should also be included in this section
- Proposed uses, especially south of Banbury Road, require more detail as this development will influence the wider network of roads, footpaths and cycle paths within and surrounding the SDA
- The X8 bus route is no longer in operation
- Timetable details should be included when considering bus services
- Parking is a key constraint in Chipping Norton that needs to be addressed
- More emphasis should be given to existing landscape features both within and adjoining the SDA
- Glyme Farm should be considered for its landscape and biodiversity value, especially with regards to farmland birds
- The precise location of the Roman building is not known and further archaeological work needs to be completed
- The informal footpaths within and connecting the SDA need to be acknowledged and considered
- The critical importance of surface water drainage and the potential impact on the River Glyme needs greater emphasis
- Great emphasis should be placed on the limited capacity of local healthcare provision and the constraints that the Chipping Norton Health Centre currently face
- Water, wastewater and sewage network capacity upgrades will likely be needed
- The provision of a new Secondary School should be considered alongside the new primary school
- The SPD should require a new park rather than just ‘consider’ its delivery

## Uses

### Existing Uses

Within the SDA, the young woodland along the eastern border of the SDA is important to note, especially the variations in the quality of the woodland. The 2017 ecological survey describes the northern block of the woodland as being of limited value as it has no remaining ground flora, no under-storey and is dark due to dense canopy cover. Pheasant rearing on the site also very likely has resulted in a high nutrient content of the soil due to the presence of so many birds. Alternatively, the southern woodland block is of only intermediate ecological value, according to the extended phase I habitat survey commissioned by the site promoters. Moving forward, the SPD should reflect these variations between land parcels in terms of their biodiversity and landscape value.

### Proposed Uses

Important details to add to this section relate to the development south of Banbury Road, sometimes referred to as ‘the Pillars’. In particular, decisions made regarding the reserved matters will set a precedent for important features of the SDA, most notably the treatment of the eastern link road (ELR). As the northern end of the ELR is included in the Pillars development, the design, character and initial alignment decided through this application will inevitably impact (though not

necessarily wholly determine) the remainder of the road. Similarly, the inclusion of a footpath and/or cycle path within the Pillars development to allow movement between new residential areas and key services/facilities such as the health centre and bus stops is also an important consideration for this planning application. Again, the linkages established through this early development will impact the design of the wider pedestrian/cycling network within the SDA and its connections to surrounding areas.

### **Adjacent Uses**

At the northern end of the SDA, the cricket ground should be noted and the proximity of uses to the cricket pitch should be considered following an assessment of the ‘ball strike zone’ to ensure public safety. East of the site, consideration should be given to the relationship between the SDA and land parcels that are currently being promoted for development in the medium to long-term. In the middle of the site, it is also important to note that the Tank Farm farmhouse is excluded from the SDA though it is completely surrounded by it. The farmhouse is a residential property that is currently occupied. Finally, south of the SDA, the allotments and woodland both owned by the William Fowler Trust are important uses that will be impacted by the SDA, especially the provision of the eastern link road. Additional consultation responses regarding the allotments and woodland are noted in the transportation sections of both Part One and Part Two of this report.

### **Transport and Air Quality**

The X8 railbus service to Kingham Station has not been in operation since 2017 and the characterisation of Kingham Station as ‘near’ town is not accurate given that the station is 5.3 miles away. Similarly, the SDA’s location ‘immediately adjacent’ to the town also requires more explicit reference to the town’s hilly topography – though services and facilities may be in close geographic proximity, the topography of the area limits accessibility especially when walking or cycling. The inclusion of riding as a potential substitute for the private car is unrealistic.

With regards to the town’s existing bus services, a more detailed description of the timetables is needed to highlight service gaps. Though buses serve the town, none have a frequency greater than once per hour and there are no buses to Banbury and Witney in the evenings and on Sundays.

The lack of parking capacity in the town is also a key constraint. Reference could be made to the Council’s 2016 Parking Strategy or the Oxfordshire County Council’s Parking Policy in relation to Chipping Norton. Stronger language around the severity of the lack of parking capacity and/or requirements to address this through the SPD should be used.

With regards to transportation and air quality, the movement of HGVs along the A44/Horse Fair is the primary cause of air pollution and traffic congestion in the town. As a result, the delivery of the ELR presents only a minor potential benefit to air quality and transportation and should not be presented as the primary justification. The potential need for a Compulsory Purchase Order (CPO) to deliver the ELR, specifically the southern portion connecting to the B4026/A361, should be discussed including the implications for the William Fowler allotments and woodland.

### **Landscape**

Acknowledgement of the water tower itself as an important local landmark should be included and considered in the SPD. Reference to local parks, avenues (other than the ELR) and woodland areas are also lacking.

Outside of the SDA, additional elements that comprise the landscape character of the area such as stone walls, hedges and mature trees that immediately adjoin the site should be considered moving forward. For example, the trees and hedges on the western boundary of the SDA and around Tank Farm are important to both retain and improve. Immediately south of the SDA, the William Fowler Woodland should also be considered, as well as the fields to the east of the site which are very sensitive to change in terms of landscape and biodiversity. To the south east, the unique landscape around Glyme Farm is also highly vulnerable to change. Importantly, this area contains unimproved limestone grassland which is an increasingly rare habitat locally and is of particular importance to farmland birds (this is also discussed in the *Biodiversity* section below).

Further detail of buffer and/or transitional boundary landscapes should also be included, both in terms of their present features and specific recommendations to improve the relationship between the SDA and surrounding countryside to the east.

Additional surveys are needed to identify landscape features, habitats and species of particular importance within and surrounding the SDA. The site promoters note that additional landscape surveys, including Dark Skies sites at the Rollright Stones, will inform landscape considerations for the site and the SPD should not seek to constrain this process.

### *Cotswolds Area of Outstanding Natural Beauty (AONB)*

Though the SDA is outside of the AONB, it nonetheless is within its setting; the impacts that the SDA will have on the AONB and its setting therefore require greater emphasis and consideration moving forwards.

## **Biodiversity**

As previously mentioned, the fields to the east of the SDA and areas around Glyme Farm are of particular ecological importance and are vulnerable to change. Glyme Farm's special importance for farmland birds and as containing the headwaters of the River Glyme requires more emphasis due to the importance and sensitivity of these features at both the local and regional levels.

An Environmental Impact Assessment (EIA) should be completed for the site, but also include the Glyme and Dorn Conservation Target Area (CTA), Glyme Valley Site of Special Scientific Interest (SSSI), Glyme Farm and the Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust (BBOWT) reserve which are all in close proximity to the SDA. Furthermore, the relationship between these areas is important to assess and understand to protect these biodiverse rich areas from direct and indirect adverse impacts of the development including recreational pressures resulting from use of the Glyme Route Public Right of Way (PRoW).

Similar to the landscape section above, existing trees, hedges and dry stone walls should be retained and improved/restored where possible as these are important habitats. Buffer areas around trees and on either side of hedges should also be kept in order to allow these to grow to full maturity.

Within the site, it should be noted that the fields are currently used by corvids and gulls for feeding, particularly where pastures are grazed by cattle. Locally, the decline of farmland birds is of particular concern, especially at Glyme Farm where biodiversity-friendly farming practices have created a 'stronghold' for farmland birds in north-west Oxfordshire. Since 1982, 122 bird species have been recorded within or on land adjoining the SDA, including 25 Amber and 32 Red Listed species. Notable species include the tree sparrow, lapwing, greenfinch, corn bunting, grey partridge, linnet, skylark, starling and yellowhammer.

Other high quality habitats in the area should also be considered and include Over Norton Park and New Chalford Farm.

## Heritage

The Oxfordshire Historic Environment Record (HER) contains records of 7 sites/finds within or in very close proximity to the SDA, and range from the Neolithic to Anglo-Saxon periods. A comprehensive archaeological strategy is needed to identify, record and/or protect any important features. Furthermore, the precise location of the Roman building is not known and the area of archaeological interest is greater than the area shown on the SDA map.

Finally, policy CN1 of the Local Plan includes specific reference to the investigation, recording and safeguarding of the known and potential archaeological significance of the area; the SPD should reflect this sub-point. The SPD should also clearly state that archaeologically significant areas are unlikely to be acceptable for development and that remains should be left *in situ* with appropriate management schemes in place.

Paragraph 4.42 (page 25) also contains an error and should read as “*In addition to the designated Conservation Area, there are 126 Listed structures in Chipping Norton: one Listed at Grade I (the Church of St. Mary); eleven at Grade II\*; and 114 at Grade II.*”

## Public Rights of Way (PRoWs)

Use of the Glyme Route footpath is anticipated to increase with the addition of 1,200 homes nearby. Adverse impacts on the Glyme and Dorn CTA and Glyme Valley SSSI by walkers, especially those with dogs, is a real concern. Following the replacement of stiles along the path with a gate, recreational use of the path was noted alongside increased adverse impacts on habitats and species. A careful balance is needed to ensure access to the countryside for new and existing residents, while also protecting ecologically sensitive areas.

For many, the PRoW from Wards Road to Tank Farm is a well-used footpath that should be upgraded, lit and resurfaced; alternatively, others argue that its rural character should be retained. Opinions on lighting along footpaths (and within the SDA more generally) is split and highlights the need to balance amenity/access, safety and potential adverse impacts on wildlife, including species sensitive to night light.

Finally, the informal footpaths through the fields around Tank Farm should also be considered as the SPD is brought forward. Pupils and parents on school runs often cut through the fields on their way to the schools that border it. The importance of these informal desire lines was highlighted during the construction of another development which obstructed part of the route. Following local protest, this was soon remedied. Nonetheless, this demonstrated the need to consider access both after the development is complete as well as during the construction phases.

## Geology, Hydrology and Soil Conditions

The critical importance of surface water drainage and potential impacts on the River Glyme requires greater emphasis given the proximity of the SDA to the headwaters located at Glyme Farm. Any drainage systems implemented must not pose a pollution risk to the aquifer, and in order to achieve this, it should also be noted that additional land may be required beyond the SDA boundary. A full study of the hydrological impacts of the development along with mitigation strategies should inform development proposals.

With regards to soil conditions and agricultural land classifications (ALC) on the site, paragraph 4.57 states that the majority of land is classified as Grade 3b. Though this is true, the statement overgeneralises the range of grades that are present within the SDA, which includes some areas that are identified as Grade 3a ('best and most versatile') and therefore warrant greater protection from development.

### **Infrastructure Capacity**

The addition of 1,200 new homes will require an increase in all services, healthcare provision and is as a key priority that should be addressed in the SPD. The CNHC is an important facility more regionally and has been designed to be a "health hub" to accommodate a critical mass of GP's as well as a range of therapies provided both privately and under contract to the NHS. These collectively offer a concentrated service aimed at taking pressure away from already stressed hospitals and A&E departments. The Chipping Norton Health Centre (CNHC) currently accommodates 15,637 patients but does not have the capacity to support new patients from 1,200 new homes. The current CNHC site is developed to capacity and therefore, a physical extension on additional land is needed to support its hub operations. Other than within the SDA, there is no other practical expansion land available. Therefore, adequate and specific provision should be ensured through the development of the SDA via the principles to be set out in the SPD so as to enable the expansion of the CNHC to meet the identified growth from this and other developments in the Chipping Norton catchment area. Until an appropriate capacity increase through the expansion of the CNHC is complete, funding for should be ring-fenced and allocated to healthcare provision.

The existing water network capacity is unlikely to be able to support the demand generated by this development. Strategic water supply infrastructure upgrades are likely to be needed. A similar position applies to the waste water network capacity and further modelling will need to be completed to determine the exact needs. Contributions towards the cost of increasing household waste recycling capacity in or near to Chipping Norton will also be needed.

The development of the SDA and resulting population increase in Chipping Norton will also place an additional burden upon the ability of the Thames Valley Police (TVP) to police the new development and surrounding area. The SPD should allocate developer contributions to wider infrastructure requirements that extend beyond the site, for example and with particular regard to Policing, staff set up costs, fleet and vehicles, Automatic Number Plate Recognition cameras, Mobile ICT provision and property requirements.

Last, while there is explicit reference to the provision of a new primary school, the capacity to absorb additional secondary school places should also be assessed and if necessary, provisioned within the SPD.

### **Open Space and Leisure**

The SPD should include stronger language that goes beyond 'exploring the possibility' of creating a new park and make this a requirement of the development.

### **Employment Land**

No comments received.

## **PART TWO**

# Key issues and priorities for the East Chipping Norton SDA

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# The type, size and mix of homes needed

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## Summary of key issues raised:

- Responses varied and demonstrated a wide range of positions with regards to the type, size and mix of homes needed
- Affordable housing needs to remain affordable in perpetuity
- Affordable housing must be affordable to local people on local wages
- Key worker housing could be delivered in partnership with key employers
- Provision for the travelling community are not appropriate here

## Type, size and mix

Opposing views were expressed with regards to the type, size and mix of houses that are needed in the local area. At one end of the spectrum, some respondents make a case to: rebalance the age range of the community through the housing stock and emphasize family homes; include some high quality 3-/4-bedroom houses suitable for older people downsizing or families upsizing with a minimal number of flats; and/or deliver homes that are large enough to include ample storage so that any garages are used for cars and are not cluttered with household items. Alternatively, comments also argue that: there should be a bias towards higher-density properties, including low-rise flats and terraces as in Topside rather than large detached houses; that there should not be any homes with more than 3-bedrooms; and/or that there should be a balanced mix of types and sizes of homes in a mixed layout to avoid concentrations of any one type in an area.

In terms of mix, some make the case that the SPD should be prescriptive to ensure the housing actually meets local need, while others believe it should be indicative unless there is clear evidence that supports a deviation. Further, housing need and demand should not be classified as to whether they are detached, semi-detached or terraced but according to number of bed-spaces and/or internal floor-space since large houses can be terraced and small houses can be detached.

Regarding density, some agreed that an overall net density of 34.6 dwellings per hectare is reasonable, provided that the higher density areas enable lower densities with substantial tree planting in visually sensitive locations. On the other hand, other respondents argue that this density is too high and resulting plots would be too small.

Additional comments make suggestions for other types of homes that should be delivered as part of the SDA. This includes: houses built to the highest eco-standards; homes with flexible living spaces; Lifetime Homes; co-housing units; live-work units; partially finished 'shell homes' for custom completion; homes with 'granny annexes'; and/or homes built on land parcels offered to local building companies and co-operatives.

Comments regarding the mix of self-build housing within the wider housing landscape also varied. To avoid delivery delays and health and safety issues, some felt that self-build homes should be concentrated in a single area. This could also be done where inter-visibility is low. Alternatively, some felt that self-build homes could be grouped in small clusters throughout the development so that builders can learn from each other. Last, another respondent states that the design of self-build homes should be strictly controlled.

The site promoters suggest that the housing mix identified in the SPD should only provide guidance with the detail left to the promoters to agree with the Local Planning Authority at the point when the planning application is made. The appropriate mix of tenures and types will be informed by discussions with relevant stakeholders, further survey work and studies commissioned by the site promoters.

### **Affordable housing**

There was general agreement that the SDA should contain a mix of affordable housing tenures including social housing, affordable units to rent and buy and shared-ownership schemes (for example, in Cherwell where some homes can be bought in stages to help people on to the property ladder). One response suggests that the affordable housing in the SDA should go further and be entirely developed to provide affordable council housing with a bias towards affordable units to rent. Importantly, responses highlight concerns that affordable units may be lost over time and so the SPD should safeguard them as affordable housing in perpetuity. For this reason, Starter Homes should not be included in affordable housing quotas as these do not provide affordable housing in the long-term. There is also concern that developers will not actually build the promised affordable units and the SPD should address this. Other comments emphasize the need for affordable housing to be affordable to ordinary local Chipping Norton people on local wages.

Developers' profits from affordable housing must be kept at a reasonable rate. To make units more affordable, Oxfordshire County Council should reduce the selling price of their land holdings to lower the cost of affordable units rather than increasing profits.

### **Meeting specific housing needs**

A number of comments address housing for essential local workers ('key workers'). Conversations with employers in essential service sectors should be used to guide the allocation of affordable homes for essential local workers in sustainable locations relative to their workplaces and needs. Homes could also be set aside for key workers, especially in healthcare and social care sectors as targeted allocations or in conjunction with the employers themselves. Another response suggests that key worker housing should be council owned and that OCC is in a good position to do this as a key landowner.

To help meet the housing needs of young people and families homes should be of a suitable size, with sufficiently sized bedrooms and living/dining areas to support shared family activities such as eating together. Homes should also have gardens and safe pedestrian access to schools and pocket parks.

In terms of older people's housing, a number of responses argue that there is enough provision in the area already and that the general housing mix should be able to meet the needs of older people downsizing. On the other hand, some note that the demand for all types of provision for older people is likely to increase exponentially in the foreseeable future given current population trends. Therefore, it would be prudent to provide suitable housing including a significant percentage of homes designed for less able people. Homes should be required to be built to Lifetime Home standards and be located close to the local centre, shops, bus stops and healthcare facilities. Specific housing for young families and older people could also be integrated to encourage inter-generational mixing.

An increased proportion of terraced properties and flats should also be available for vulnerable families, care leavers and young vulnerable people, along with specialist accommodation for those

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with disabilities. Generally, any approach that includes specialist housing provision should be part of a coordinated approach that is coupled with increased healthcare provision, transportation and local community services.

Some considered that provisions for the travelling community are not needed and are not appropriate here.

# The type of business land needed

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## Summary of key issues raised:

- The demand for new business land must be clearly demonstrated
- Business land provided must be safeguarded and remain as business land in perpetuity
- Business space to draw high tech, high skill and high value jobs to the town is needed
- The location of business land should be re-considered
- Adequate parking will be important, as well as improved public transport links

Some responses note that there are vacant units in town and in Cromwell Park, creating concern that there is inadequate demand for new business land. Others express concern that housing is not being located where jobs are, which will result in a rise in commuter traffic and car dependency. It is also argued that where additional business space is needed, this should be provided in smaller units in the town centre. Alternatively, relocating the business land south of London Road should be considered to allow future growth further east of the SDA on land currently being promoted for residential development. A further option proposes to locate a multi-sport recreational area with a football pitch, tennis courts, expanded cricket grounds, and a new clubhouse/changing facilities where business land is currently proposed. For the site promoters, the allocation of land uses, in this case business land will be informed by the masterplanning process and subsequent work to take place in spring 2019. Therefore, the SPD should not aim to be overly prescriptive.

Where the principle of business land provision is accepted, comments generally focus on building smaller more flexible office and light industrial units to attract a mix of employment sectors and skills while providing space for the expansion of local growing businesses. Spaces should also be suitable for high-tech industries to attract high-value jobs to the town. The type of business spaces provided should ultimately be based on what current demand requires ensuring rapid uptake once built. Releasing units in phases is also suggested to ensure supply is appropriate for demand.

While some advocate business units being designed in a traditional style (ex. stone structures with reference to the local vernacular), others advocate barn-like structures that would be suitable for creative industries. In its current proposed position, the business land will nonetheless require high design standards as it is along one of the main, tree-lined entrances to the town.

Flexible live-work units should also be considered alongside hireable space for creatives, artists' studios and a business hub with bookable meeting space, common areas, and access to printing / digital facilities to support flexible and home workers. Future-proofing this space is essential, and units should be equipped with excellent internet connectivity and other digital infrastructure. To support the uptake and success of the business area, it is vital that generous parking is provided. It should be coupled with improved bus services to Oxford.

The narrative underlying many of the comments mentioned above are predicated on 'cautionary tales' where large local employers like Parker Knoll have closed and business land subsequently re-developed for housing and mixed-uses. Therefore, it will also be important to safeguard the 5 hectares of business land to ensure that it remains available at reasonable prices and is not lost to other uses. Furthermore, the provision of smaller units for a number of occupants rather than a single large marquee employer is also seen as more sustainable as it would support a diversity of sectors and is therefore less vulnerable to economic change.

# The overall character and form of development

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## Summary of key issues raised:

- Responses demonstrate a wide range of views with regards to the overall character and form that the SDA should take
- The overall character and design should balance traditional/local vernacular features and modern design
- The type of design is less important than the quality of design
- Areas should relate well to each other and the existing town

There is considerable disagreement regarding the overall character and form that the SDA should take. On one hand, a number of respondents argue that the new development should not be different and should be in keeping with the existing character of Chipping Norton as it is an extension, not a new settlement. Stone should be used over brick though simple stone cladding on a pre-designed box structure (ex. Aldi) should not be allowed. On the other hand, some advocate for ambitious, contemporary, imaginative, bold and award-winning designs that are sympathetic to the local vernacular and the area's rich cultural history. In between these two positions, responses also suggest that reference to the historic character of the local area should be referenced but not replicated. The SDA's overall character and form should be a contemporary interpretation of local traditions where sustainability, energy efficiency, use of renewables and integrated green infrastructure are a strong part of the design language.

Whether traditional or contemporary, the overall character and form of the development should: be unified even if multiple character areas are included; contain areas that relate well to each other, green spaces and the existing town; include plots of a good size; designed to make communities more active and healthy using principles of Sport England's Active Design guidance; well provisioned with public benches, fully accessible public spaces and green play areas at the heart of the SDA rather than edges; facilitate play for all, inclusivity, and inter-generational mixing; be legible and intuitively laid out; and/or separate people from traffic.

For some, the character and form of the SDA is not a question of 'types', but one of quality, leading some to suggest that the District Council should tightly control the style of development. Measures for delivering quality and consistency should therefore be identified.

Specific examples of development or design features were also used to illustrate the character and form that some respondents wish the SDA to take. These include: Georgian squares as in Topside; Parker's Circus; 2-storey houses with gardens, laid out around a public square or local town; building on short blocks or groups as well as arranged in squares and circles to add variation; built forms set-back from the road with large grass verges or other landscaping; and/or archways between housing blocks to give a sense of connectivity.

# Transport and movement

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## Summary of key issues raised:

- Further technical evidence is needed to understand traffic patterns in the area to then propose better solutions to divert HGV traffic from the town centre
- Additional technical evidence is needed to determine the alignment, access points and access geometry of the eastern link road (ELR)
- If Compulsory Purchase Orders (CPOs) are needed, this should be specified and impacted areas clearly identified
- The loss of allotment land and/or woodland as a result of the delivery of the eastern link road needs to be explicitly stated, justified and appropriately re-provisioned
- The ELR should be designed as a mixed-modal transport corridor rather than as a by-pass and should include active travel infrastructure and landscaping
- The ELR should have a similar treescape and character as the London and Banbury Roads
- The ELR should be designed primarily to facilitate the movement of HGVs
- Access points and junctions require careful consideration and good design to ensure the safe movement of traffic
- Changes to the character of Public Rights of Way (PRoWs) must be considered in discussions with local people
- Cycling and pedestrian links to connect the SDA with the town centre are very important
- Maintenance of pedestrian and cycling paths is essential
- Access to nearby rail stations should be improved, either by the re-instatement of the X8 railbus to Kingham, new bus services or new active travel links between the SDA and stations
- Additional bus services and infrastructure will be needed, including more frequent services during evenings and on Sundays

Transport and movement within the SDA, Chipping Norton and the wider region are key issues that were highlighted throughout the consultation. In many responses, a broader and co-ordinated strategy is felt to be needed to address traffic and air quality issues within and around the town. While the SDA and the Eastern Link Road (ELR) are seen by some as having a negative impact on traffic and air quality, some also recognised that the SDA presents opportunities for focused interventions to improve transport networks and infrastructure. Opinions on how this is best done, however, vary.

To start, assessments of traffic flows, including a breakdown of flows by vehicle type, are needed to understand the traffic patterns in and around Chipping Norton and to subsequently make decisions about road infrastructure. Additional surveys are due to take place in spring 2019 and will subsequently inform the masterplanning process including the final alignment of the eastern link road. Improvements to New Street / West Street / High Street are considered likely to be needed, including widening and lights, to cope with the increase in traffic generated by the SDA.

Parking within the town centre is a key concern as it is either at capacity or very close to it. A car parking strategy and substantial new provision is needed for Chipping Norton, especially with the addition of 1,200 homes. Adopting some of the creative solutions used in Oxford City could be explored. Adequate parking for residents, workers and visitors is therefore essential.

## **Vehicular access including the eastern link road**

If the principle of the road is accepted, one respondent states that it should be completed before the rest of the SDA is developed so that it can be used to bypass construction areas and ensure that the town does not become gridlocked. Contrary to this, another comment references the Inspector's Report of the Local Plan which states that at least 600 homes could be accessed solely from London/Trinity Road and so the early delivery of the ELR is not a constraint to the timely delivery of dwellings.

### *Impacts on allotments and/or woodland*

The uncertainty around the alignment of the link road, especially at its southern end raises concerns in a number of responses. The potential loss of allotment land and/or woodland, in addition to the lack of specificity around requirements to re-provision these, is a major point of opposition as both are highly valued by local people for their historical, social, health and wellbeing, and environmental benefits.

If the ELR were to require the loss of allotments or woodland, those that would remain would be heavily and negatively impacted by noise and pollution emanating from the road. Adjusting the alignment of the ELR to create a southern terminus at or beyond the Charlbury turning point is also suggested, as is the proposal to shift the entire road further east along the eastern border of the SDA to avoid the loss of allotments or woodland. While some argue that the ELR should only result in the loss of woodland to preserve the allotments, this directly opposes other arguments that the re-provision of the woodland with new trees cannot replace the nearly mature trees that would be lost. An accurate assessment should be completed to determine exactly how much of either allotment land or woodland will be lost, including space lost during construction.

The site promoters suggest that the SPD should helpfully state that the Local Planning Authority will consider using its CPO powers where necessary to deliver the link road. More specifically, once the alignment is known, the SPD should clearly state if a Compulsory Purchase Order (CPO) would be required and identify the areas to be impacted.

If allotments are lost, the SPD should also detail where and how it is re-provisioned, with further requirements to provide: relocation assistance; a permanent water supply; concrete bases for plots; and better access. Re-provision should be done as early as possible to allow users a reasonable amount of time to transition gardens between old and new gardens. Overall, the SDA should not result in a reduction of allotment land but should increase the town's provision given the expected population increase.

In terms of potential locations for the re-provision of allotments, comments suggest that: somewhere near the existing allotments within the SDA would be appropriate, not on the other side of town; multiple sites within 'wheelbarrow' distance should be considered; and / or re-provision is done adjacent to the green corridors. However, reference to the Local Plan Policy CNI is also noted as this does not specifically require the re-provision of allotments within the SDA, only that they are replaced/re-provisioned in an appropriate and accessible location.

### *Character of the eastern link road*

One comment suggests that when determining the alignment of the ELR, the site promoters should be required to undertake a full comparative assessment of alternative alignments and make these available for public scrutiny before any decision is made. Alternatively, comments also suggest that the SPD should not seek to constrain the master planning process and technical work that is due to take place in 2019, which will ultimately inform details of the road's junctions and alignment. The masterplan for the site is expected to evolve with technical input, especially with regard to the ELR's alignment.

To encourage low-carbon modes of transportation, it is important to consider the ELR as an intra-urban transport corridor including pedestrian and cycling paths rather than just a by-pass road. The alignment should allow integration with the development and its surroundings. Further, given that road safety fears are the main reason why people do not use active modes of travel, the road must be designed to ensure the safety of cyclists and pedestrians. This might entail the separation of cycling and pedestrian paths from vehicle traffic by a biodiversity-rich buffer zone or a row of trees as on London and Banbury Roads. Where trees are planted, enough space should be saved around them so that they are able to grow to full maturity without obstructing access points in the future. Overall, the design should be integral to the landscape-led design of the SDA and not an afterthought.

Lighting along the ELR is important to consider as this can adversely impact wildlife that is sensitive to night light such as foraging bats, as well as the setting of the AONB. Measures to limit interactions between wildlife and vehicles should be implemented. The need for specific measures to protect barn owls from vehicle impacts is also noted. Surface water drainage from the ELR must also be carefully considered.

To ensure that buses and cars can comfortably share the road, the ELR should also have 2 metre wide partial pull-ins for buses at stops so that vehicles are able to safely pass during passenger pick up or drop off. To ensure safe speeds, one respondent suggests a curved alignment to slow traffic. Ultimately, the road must adhere to national highways standards and the Design Manual for Roads and Bridges (DMRB). Careful consideration of the ELR design will also be needed where it meets Glyme Lane and signalised crossing should be considered. Residential properties should not have direct access from the ELR.

The proposed alignment severs the connection between residential areas to the west of the road and the green areas to the east. The ELR's role in providing or restricting access to green spaces and ecologically sensitive areas to the east of the road is discussed in further detail in the *Mitigating impacts on the landscape* and *Achieving a net gain in biodiversity* sections of this report.

Last, site promoters of the land east of the SDA suggest that in addition to the north-south alignment of the ELR, consideration is given to an eastern connection to the land currently being promoted for development east of the SDA.

### *Air quality and HGV traffic*

Several responses question the proposed link road's ability to reroute traffic away from Chipping Norton town centre. Instead, proposals to re-route the A44 to bypass Chipping Norton via the Rollright Stones connecting Worcester Road to London or Banbury Roads should be reconsidered as this would be a more effective way to direct HGV traffic away from the town centre. Additionally, the recently imposed weight limit on Burford Bridge further reduces the necessity of the ELR as a HGV bypass since changes to HGV traffic patterns in the wider area have already been noted.

If the principle of the ELR is accepted, additional measures should be implemented to optimise the road's ability to steer large vehicles away from the town centre. Examples include: a one-way system on the London and Banbury Roads, as well as part or all of the ELR, to deter all HGVs away from the town except for use of the ELR; Feeder roads from the ELR should allow access to the town centre for pedestrians, cyclists and cars, but not HGVs; implementation of a weight limit on the A44; North-south access points on to the ELR should be as far away from the town centre as possible; 20 mph speed limit within the town centre, all radial roads and school zones; if HGVs were directed away from the town centre and on to the ELR, traffic calming measures should not be used so that

HGV movement on the ELR is optimised, though there could be traffic restriction implemented on the B4026; work to the existing Burford Road and top of New Street should also be completed to allow heavy traffic to use it safely, including through roundabouts and traffic lights; and/or the road should be designed for HGVs and cyclists/pedestrians offered an alternative route.

It is also noted that HGVs are negatively impacting the local air quality and road conditions now. Therefore, it is important that a specific plan to address this problem is developed immediately and before the SDA / link road is brought forward.

### Access

The site promoters accept that three access points will be needed, however the exact location of the southern two access points is yet to be determined. The SPD should not seek to fix the location of these access points as in Figure 15 of the Issues Paper as further feasibility work is needed to establish access points, access geometry and alignment.

Full-sized roundabouts at each of the three proposed junctions should be delivered, though the 4<sup>th</sup> proposed access point at Trinity Road should only allow pedestrian and cycling access. Extending Trinity Road, in whatever capacity, would however help to increase permeability between the town centre and SDA. Junction improvements at proposed access points are also needed as the roads are too narrow to accommodate large vehicles.

The southernmost junction of the ELR and Charlbury Road/Burford Road needs special consideration as at present it is considered to be dangerous due to the high speed of traffic, limited visibility of on-coming traffic due to topography, and increased congestion. More technical detail of the proposed junction at Burford Road is therefore needed.

### Active travel

This section focuses on pedestrian and cycling infrastructure. Respondents note that riding is not a realistic form of active travel and this should not be characterised as such in the SPD. Specific references and links to the Oxfordshire Walking and Cycling Design Standards in the SPD are strongly recommended. Long-term maintenance of these paths is also very important and should be included.

One respondent also emphasises that pedestrian and cycle connectivity across the Western boundary of the SDA towards town is the essence of achieving the highest possible share of walking, cycling and public transport. Given the proximity of shops and facilities, it was felt that it must be possible to live within the SDA with only 1 car per household.

### *Pedestrian infrastructure and walkability*

The existing footpaths within the SDA are currently well-used and opinions regarding potential changes to their use and character vary widely. Broadly, every effort must be made to make use of all existing pedestrian links to the town and to create new links wherever possible. For existing paths, consultation with local residents will be needed to determine if and how the character of these routes will change. This is especially important since there is a clear disagreement over whether or not the routes should be upgraded, (re-)surfaced, lit or their rural character preserved. Safety, amenity, biodiversity and encouraging healthy lifestyles are all recognised as important considerations that result in different and sometimes opposing views about the future character of existing footpaths. Relevant stakeholder discussions, surveys and master planning work will be used to inform the position and function of the PROW network within the SDA.

Priorities in Oxfordshire County Council's (OCC) adopted Rights of Way Improvement Plan are to protect existing countryside access and where possible and reasonable to mitigate the impacts of development to enhance the network for all users and to meet shared sustainable transport, healthy living and healthy environment goals and deliver community benefit. To address the impact of additional traffic on users, mitigation measures that improve traffic-free routes and safer road crossings and facilities are recommended. Within the SDA, OCC recommends that paths are made fully walkable and ideally cycle-able to integrate the site with the town. This might include legal processes, widening, barrier removal, lighting and asphalt surfacing. The paths need to be integrated with other paths within the site and included in positive and intuitive routeing and signage for destinations. Road crossings and other disjunctions need to be avoided or minimised and where needed should ideally be signalled user-controlled crossings.

Outside of the SDA, a Section 106 contribution will be sought to mitigate the impacts of the development. The contribution would be used to improve the PRoW network in the vicinity of the development – in the 'impact' area up to 5km from the site. Primarily this is to improve the surfaces of all routes to take account of the likely increase in use by residents of the development as well as new or replacement structures like gates, bridges and seating, sub-surfacing and drainage to enable easier access, improved signing and protection measures such as anti-motorcycle barriers. New short links between existing rights of way would also be included – especially to provide alternatives to using the road.

The informal footpaths through the fields around Tank Farm should also be considered in the SPD. Uses currently include: pupils and parents on school runs who cut through the fields; access to the health centre, bus stops and other services off of London and Banbury Roads; and recreation and leisure, particularly by dog-walkers. Therefore, a network of appropriately routed paths needs to be created with the involvement of local people to potentially formalise these paths, support these existing uses and also facilitate the uptake of active travel within the SDA.

### *Cycling infrastructure*

There is some doubt among respondents as to whether or not cycling is a practical mode of transit due to the hilly topography of the area. For some, electric bicycles are necessary to get up steep hills. Alternatively, the land within the SDA itself is relatively flat as it sits on a plateau. Consequently, cycling within the SDA should be strongly encouraged, especially for pupils on their way to and from school and for short trips.

To further encourage cycling as a mode of transportation, the wider network of roads and paths beyond the SDA and especially into/within the town centre requires further consideration. Junction improvements, priority crossing points, separated lanes, re-surfacing and bike parking infrastructure are all ways to improve the safety and attractiveness of cycling.

For leisure cycling, improvements to the wider infrastructure network within the sub-area should include the creation of access points on to smaller roads and lanes which currently are only accessible via major roads, limiting their appeal. Routes, surfacing and crossing points should all be considered to provide safe and traffic-free routes from the SDA to these lanes/small roads and the wider area around Chipping Norton. Physical traffic calming measures on the Old London Road and minor road from the A361 to Churchill should also be considered to ensure the safety of all road users. Off-road and/or direct connections to rail stations (discussed further below), major employment areas and wider cycling networks are also proposed as ways to make cycling more attractive.

## Public transportation

Local concerns over congestion and air quality are amplified by the expected increase in car users as a result of the development of the SDA. Responses to the consultation place a strong emphasis on improving local public transportation services, especially if a modal shift away from private car use is to be supported. While some would like to cycle or walk to work, for example, it is not feasible for many for any number of reasons.

### Bus Services

One respondent notes that changes should be in addition to existing services rather than replacing them. Another respondent that suggests that the development of the SDA should help to facilitate a more rational/effective bus services through the town, reducing car dependency and consequently air pollution from the use of private vehicles. Several comments also suggest that the service frequency of the S3 and 488 buses should be increased, possibly even before the houses are occupied and funding recuperated through Section 106 agreements.

Additional bus stops on the eastern link road and/or London Road should be identified and fixed at an early stage so that adjoining residential parcels are designed around them, having particular regard to pedestrian connectivity, frontage orientation and set-back if necessary. Bus stops should be located on the exit arms of the crossroads of the ELR and London Road junction, and at least a further 2 pairs of stops along the ELR south of London Road and one north of London Road.

Servicing the SDA with bus routes will inevitably require buses to terminate and lay-over in the town centre. It is extremely important that the space to turn a full-sized bus and wait at suitable facilities in the town centre is taken forward in parallel with the proposals. These facilities would also accommodate buses serving other routes and other bus operators.

### Rail Access

Improving access to both Kingham and Charlbury stations is important, and the X8 railbus should be re-instated. Bus services to Kingham Station and the X9 could also be integrated in order to maximise journey options and opportunities for those travelling to Witney. Providing quality bus services between rail stations and new/existing settlements will be critical to reduce car use and pollution in the area.

Access to Charlbury and Kingham Stations should also be improved through a new active travel connection, potentially routed alongside the disused railway track bed. A second storey above Charlbury Station car park funded through this development is also suggested as well as a residents' parking scheme to prevent overspill parking into Charlbury Town Centre. More radical suggestions include reopening the rail link between Chipping Norton and Kingham Station.

It was also recognised that more investment in rail infrastructure is needed at existing stations along the North Cotswold Line, particularly at Hanborough, Kingham and Charlbury stations in order to facilitate greater rail ridership and meet rising demand generated by new developments. Therefore, the SPD should refer to the on-going work of the North Cotswold Line Task Force who is working at improving service frequency between Worcester – Oxford – London.

# Mitigation of impacts on the landscape

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## Summary of key issues raised:

- A comprehensive landscape and biodiversity strategy needs to be developed for the SDA and adjoining areas to inform a landscape-led approach in the SPD
- Due to the topography of the area, landscape mitigation measures to screen/buffer the SDA with existing developments is needed
- The proposed landscape mitigation area in the draft masterplan needs further consideration to ensure it can effectively soften the eastern edge of the SDA, provide robust habitats and/or be accessible to local residents
- The eastern Link road will require mitigation, especially with regards to landscape impacts due to lighting

Several responses identify the need for a wider and comprehensive approach to landscape issues and mitigation strategies with one response noting that the wording of the issues paper largely restricts mitigation measures to within the SDA boundaries. It was also felt that there is insufficient emphasis placed on respecting the established landscape character. In particular, existing trees and hedges should also be protected, not just those with special value, and be recognised for their value as a collective whole and not regarded individually. It might also be appropriate to establish new structural landscape features across the site as part of the first phase of development.

A comprehensive landscape and biodiversity strategy needs to be developed for the SDA and adjoining areas and a Landscape and Visual Impact Assessment (LVIA) completed to inform a landscape-led approach in the SPD. The development should also be subject to an Environmental Impact Assessment (EIA). The extent of the area to be assessed will require further discussion but will need to include the area impacted by the link road, future expansion areas, land needed for surface water mitigation, William Fowler Allotments, William Fowler Wood and any spaces 'left over'. Elements of the strategy could include the creation of: new links between existing woodlands; new wetlands; new avenues of trees; provision of large open spaces; a new species-rich common to mirror the existing common to the west of the town; new network of paths; a community orchard; and new allotment area.

There should ultimately be a masterplan for the built development and landscape mitigation areas that provides a comprehensive and coherent strategy for landscape, biodiversity and access management. During the preparation of the masterplan, there may also be merit in testing alternative green infrastructure distribution patterns, for example, large central open spaces, linear corridors, or diffuse nodes. Local expertise on landscape and biodiversity should be used to inform the masterplan and developers should be responsible for implementing and managing green infrastructure.

## Key Views

Several responses note the visual sensitivity to the south of the SDA. Visual impact of development on approaches to the town on the A361 should be mitigated and softened by a high level of semi-mature indigenous planting within and adjacent to the site. More generally, existing properties below ground level of the SDA should be protected from overlooking, noise and pollution through appropriate buffer areas. Suitable buffer zones of non-development around hedges and trees are also

needed to ensure soft transitions. Where trees are planted, pine clusters and copper beech should be used in keeping with surrounding areas.

Other sightlines specifically mentioned include parts of the western edge of the SDA. One response notes that Brassey Close will require additional screening while another asks for confirmation that the existing area of woodland backing on to Foxfield Court will not be changed as part of the development.

### *Proposed landscape mitigation area*

The proposed area is inappropriate and an inefficient use of land as it will not mitigate impacts on the AONB. The lighting used on the ELR will have a far greater impact on the AONB than the development itself and therefore, impacts should be mitigated through generous buffer areas and well-treed and sensitively designed built forms. A lighting strategy should be developed which considers the area and its impacts as a whole. The strategy should consider what kind of lighting should be used, where different types should be located, and how much is appropriate. Diffuse, subdued and zero street lighting throughout the SDA should be considered wherever possible. Dark corridors may also be appropriate to manage and minimise impacts of night light on wildlife.

It would also be inappropriate to place the public park in the landscape mitigation area to the southeast of the site as indicated in the draft masterplan though this adheres to the Inspector's comments on the Local Plan with regards to the retention of open space to the south and southeast of the SDA. Effectively softening the edge of the SDA will require mass tree planting which is not consistent with the landscape character of the area. It might therefore be sensible to allow some low-rise development with interesting and varied roof designs east of the link road with extensive semi-mature planting along streets and in public spaces. Further consideration of the character, uses and opportunities for the land south of the SDA is therefore required.

The proposed landscape mitigation area also has the potential to support a range of robust habitats such as woodland, scrub, limestone grassland, as well as a planned network of paths and cycle routes to facilitate access to the countryside. Once the alignment of the ELR is set, remaining gaps between the road and SDA boundary can be 'filled in' with planting. Strategically managing this area could potentially increase public access to the countryside while reducing recreational pressure on more sensitive landscapes and habitats to the southeast.

There is also concern that the ELR will sever connections to the green and open areas to the east. The landscape mitigation area should be accessible green space for the local community following the guidance of Natural England's "Nearby Nature" document. Rather than impeding access, emphasis should be placed on improving access to green space, improving its 'naturalness' and improving its connectivity to other green spaces.

Additionally, site promoters of the land east of the SDA express concerns that landscape mitigation proposals suggested by OCC may constrain future expansion of the town east of the SDA. The promoters note that any new landscape planting or buffers on the east side of the SDA should consider eastward growth in the medium to long-term.

# Achieving a net gain in biodiversity

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## Summary of key issues raised:

- A recognised metric to measure biodiversity net gain should be used in conjunction with a mitigation hierarchy, species-focused, and regard for Wild Oxfordshire’s Conservation Target Area (CTA) management and habitat targets
- The development should aim to provide the highest possible quality enhancements for biodiversity mirroring the character of the CTA within the built environment of the SDA
- The SPD should encourage developers to deliver high quality wildlife-rich environments that conform to recognised standards such as Building with Nature
- A regional approach to mitigating impacts and delivering net gain is generally supported
- Biodiversity enhancements need to be balanced with other priorities, especially with regards to the use, users, and character of footpaths in ecologically sensitive areas

The Issues Paper insufficiently acknowledges the permanent loss of natural areas and biodiversity as a direct result of this development, especially part of the Conservation Target Area (CTA) and woodland areas. These losses need to be better justified and taken into account when determining the scale of mitigation measures that will be required. An updated habitat and species survey is needed to inform this. Further, the importance of stewardship and the long-term management of biodiversity enhancements are not sufficiently recognised in the Issues Paper and should be included in the SPD to ensure long-term sustainability. The impacts of pollution, both during construction and once the development is completed, is also overlooked in the Issues Paper.

## *Measuring net gain*

While it is frequently accepted that the Defra metric should be used, any adaptations to the metric must be justified as is the case with the Thames Valley Environmental Records Centre (TVERC) metric. Unfortunately, neither the Defra nor the TVERC metrics are sensitive enough to account for the subtleties of the off-site and indirect impacts that a development of this scale could will on an ecosystem, especially one as fragile as found within the Glyme and Dorn CTA. Therefore, while such metrics could be used, they should not be wholly relied upon. Where a biodiversity metric is used, impacts beyond the development boundary should be considered and the involvement of local conservation organisations and landowners to supplement professional opinion is strongly encouraged.

## *Delivering a net gain*

The development should aim to provide the highest possible quality enhancements for biodiversity mirroring the character of the CTA within the built environment of the SDA. In particular, developer contributions should go towards strengthening populations of farmland birds, butterflies and bumblebees that are in serious decline by creating new limestone grassland habitats and/or restoring existing limestone grassland, scrub and woodland areas. Generally, the creation of natural and semi-natural habitats within the landscape is preferable to large areas planted with new trees.

Wildflower meadows, bee lawns, appropriate and/or native selections of flowering trees, shrubs and plants, water bodies, SUDS and other wetland areas should be provided as part of the open space within the SDA subject to appropriate hydrology. Wildlife features should also be incorporated into the built environment, for example, using amphibian curbs, bat bricks, bird bricks, bee bricks, swift

boxes, fruiting trees, hedgehog highways and appropriate lighting. Best practices developed by the Royal Society for the Protection of Birds (RSPB) and the Wildlife Trusts in collaboration with major house builders should be followed. Swift conservation organisations should also be consulted about the best way to provide new habitats and how contributions can be used to support their projects. Green and biodiversity enhancing features within the SDA are also used as outdoor learning spaces.

The SPD should incorporate the 10 best practice principles developed by CIRA/ CIEEM/IEMA to deliver a net gain in biodiversity. Additionally, the SPD should encourage developers to deliver high quality wildlife-rich environments that conform to recognised standards such as Building with Nature.

While one respondent argues that off-site provision to achieve a net gain in biodiversity should not be allowed, a regional approach to mitigate adverse impacts to development and deliver net gain is generally supported, including a linear biodiversity corridor and corridor enhancement scheme for the Glyme Valley. Other regional measures could include funding for land purchases and creation of the Glyme Valley Nature Reserve and smaller pots of funding for farmers to carry out biodiversity enhancement measures on their properties. Urgent measures will also be needed to protect the biodiversity-friendly farming practices used at Glyme Farm as development moves east. Measures should be supported by a biodiversity management plan which itself should support the CTA Strategic Plan.

### *Balancing biodiversity against other priorities*

The SPD will need to be realistic about the biodiversity value that can be generated from areas subject to high recreational use and the risk of ‘double counting’ of benefits. It may be necessary to concentrate biodiversity-specific investment in areas that are less accessible or distinct from the SDA. To limit adverse impacts on the Glyme and Dorn CTA and nearby SSSIs, especially recreational impacts by dog walkers, it was suggested that Glyme Lane footpath could be re-routed to direct recreational pressure away from these areas or to limit access to pedestrians only (i.e. prohibit dogs). Alternatively, it was also argued that footpaths should have bins for dog waste while discouraging mountain bikers. Ultimately, green corridors should combine and/or balance access with biodiversity net gain targets, and must also relate to the existing wildlife corridors and off-site habitats, as well as the movement of people.

To balance these competing interests, some suggestions combine strategies to limit access to the most ecologically sensitive areas, coupled with the provision of high quality leisure and green space in less ecologically sensitive areas, possibly including a dedicated dog park and routes specifically for dog-walking. Glyme Lane would not be restricted, but other dedicated areas for recreational use could then draw away some of the recreational pressures directed towards the CTA and SSSIs.

Last, it was also noted that while efforts to achieve a net gain in biodiversity are important, developer contributions for biodiversity mitigation/enhancement should not take precedence over contributions towards healthcare infrastructure. Both should be considered equally.

# Open space provision

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## Summary of key issues raised:

- Open space and green space should be an integral part of the SDA
- Careful and well-planned provision of different uses can help to alleviate recreational pressures on sensitive ecological areas
- A new park should include a wide range of supporting play equipment, pitches and infrastructure
- Management and maintenance of open and green space should be specified within the SPD

Green spaces should be an integral part of the SDA, and similar to previous comments, these can be provided to help balance competing interests, especially between leisure/recreational and biodiversity mitigation uses. A hierarchy of access levels to different spaces for different uses might help to protect sensitive environments from recreational pressures.

A well-located and accessible new park could contain: areas for outdoor learning; dog walking/play areas; play equipment for all ages; at least one decent sized sports pitch; amenity space; a walled garden; allotments (in addition to any re-provisioned); Multi Use Games Areas (MUGAs); casual/informal open play areas; a small all-weather pitch; and a skateboard park if need is demonstrated. Elsewhere, there should be green spaces at a variety of scales and locations allowing them to permeate through the entire development. Local Equipped Areas for Play (LEAPs) and Neighbourhood Equipped Areas for Play (NEAPs) should also be included. Toddler play areas should be provided in landscaped housing courtyards separate from main park areas. A new Common to mirror the existing Common on the West side of Chipping Norton could also be included in the SDA.

A small number of comments do not support the provision of additional play space as this would undermine existing sporting facilities, of which the town has a sufficient provision already. However, most accept that a new park would be a positive addition, though the location of the park is not agreed. One response suggests a location near to schools to encourage a connection with curriculums and to encourage outdoor learning. Playing pitches are recommended where current business land is proposed to allow for an extension of recreation grounds from the cricket club to the north. Other suggestions include intensifying and/or expanding the pitches at the secondary school or at Greystones while another suggests that significant green spaces should be located on the eastern edge of the SDA to soften the edge of development and further help with landscape mitigation. To ensure accessibility, a preferred location west of the ELR and ideally located on the western edge of the SDA is noted, allowing connections to pedestrian and cycle routes and without the need to cross a large road. According to Sport England, the single playing pitch as proposed in the draft masterplan is neither viable nor sustainable, and its proposed location and orientation are not supported. An up-to-date playing pitch assessment and strategy is needed to inform the type, size and location of pitch provision. Local children and young people should be consulted to help determine the types of need.

For the site promoters, the allocation of land uses, in this case open space, will be informed by the masterplanning process and subsequent work to take place in spring 2019. Therefore, the SPD should not be overly prescriptive.

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Explicit reference to mental health and wellbeing alongside healthy activity and lifestyles should also be included as important benefits to further support the delivery of open space in the SDA. Comments also highlight the need to plan for the management and maintenance of open spaces. To do this, one response suggests an endowment by the developer to pay for the indefinite management of these spaces.

## Potential creation of a new local centre

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### Summary of key issues raised:

- If a new local centre is created, it should be located near the existing services at London Road or around the secondary school
- While a new local centre may not be needed, a new community hub is welcomed

Convenience shopping will likely be needed but a new local centre should not be created as this will undermine existing commercial areas and promote a sense of ‘separateness’ between the SDA and town centre. A local centre/service hub is already developing on London Road making an additional local centre highly unlikely; however, additional commercial capacity at the London Road centre may be needed once the SDA is completed and occupied. Alternatively, a community centre or hub is welcomed, providing meeting/community space and multiple services to mitigate loneliness, especially in older populations. It might also be appropriate to expand Glyme Hall, fund its running costs, and/or relocate/enlarge the town library there.

If a new local centre were created, the south of the site as an appropriate location, especially if access to the secondary school, sports centre, Glyme Hall and new primary school were re-oriented to create a small education hub. In this case, some commercial uses might be feasible but flexibility should be retained by only offering ground floor commercial units with flats above. It is also noted that the south of the town near the secondary school is relatively poorly served.

# Primary school provision

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## Summary of key issues raised:

- No overall agreement as to where a new primary school should be located
- The catchment area of the new primary school needs careful consideration and co-ordination with other local schools to ensure a balanced mix of pupils
- Any new school provision should support pupils with special education needs
- Modelling should be completed to determine if a secondary school is also needed

As the principle of a new primary school is already accepted, the location and form that this should take is the main focus of most comments. On one hand, some suggest that a new primary school should be provided in the southern portion of the SDA near the existing secondary school as the north is already provisioned. A southern location could also allow co-ordinated entrances to the secondary school, Glyme Hall, and sports centre to enable a more efficient use of parking, drop-off areas and bus bays. Alternatively, others preferred a more central location at Tank Farm as it would be more accessible, walkable, and at the heart of the new development. There was also a suggestion to incorporate St. Mary's C of E school using a 'land swap' arrangement with OCC to deliver a single, large and 'fit for the 21<sup>st</sup> century' school within the SDA.

Ultimately, no location can be agreed until it is demonstrated that Oxfordshire County Council's design criteria have been met and all of the appropriate information needed to assess the proposed location is submitted. Therefore an early dialogue with OCC is needed. Furthermore, the site promoters note that the allocation of land uses, in this case a new primary school will be informed by the masterplanning process and subsequent work to take place in spring 2019. Therefore, the SPD should not be overly prescriptive.

Drawing from responses received from representatives of St. Mary's C of E, very careful consideration is also needed in terms of how catchment areas will be co-ordinated for all schools in the area to ensure social cohesion and a diverse range of different socio-economic backgrounds at each. At present, local government statistics clearly show that - compared to any other primary school in the area - St Mary's Primary School's roll is disproportionately weighted towards those with significant social and emotional needs. To more easily allow the new school to include both new and existing residents in its catchment area, and thereby create a balanced mix of pupils for all of the town's schools, a location to the south of the SDA is preferable. Locating the new school near Tank Farm would likely result in the new primary school only serving new residents. Further, because the area has a high number of pupils with special education needs, any new school provision should ensure to support these students.

The new primary school should be delivered early on if not before the rest of the development. If this is not possible, St. Mary's would need financial support to help absorb the increase in school places needed until the new school is built as it is near capacity already.

Several respondents further question the need for a secondary school in addition to a new primary school. Modelling should be done to determine the secondary school's capacity and provide additional capacity through the SPD if necessary.

## Other supporting infrastructure

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### Summary of key issues raised:

- The SPD must ensure adequate healthcare provision
- The SPD should ensure that water and sewage networks are upgraded to ensure sufficient capacity is brought forward ahead of the development
- Sustainable design features should be carefully considered due to the sensitive hydrology of the local area
- A wide range of community infrastructure is identified for improvement and/or new provision through the development of the SDA
- Additional parking provision and improved bus services and facilities are needed

A wide range of supporting infrastructure is noted as part of this consultation, some referring to those listed in the Chipping Norton Neighbourhood Plan, some building on infrastructure already identified in the Local Plan, and others that are newly considered here. However, it is also noted that developer contributions for any aspirational projects and other infrastructure not already identified must be related to the development of the SDA and not simply added to the list because the opportunity arises. With specific regards to the Community Infrastructure Levy (CIL), the Chipping Norton Town Council is entitled to 25% as they have an adopted Neighbourhood Plan.

### Healthcare Facilities

As previously discussed throughout this report, healthcare provision is a key issue raised that should be treated as a priority. To address healthcare capacity, the SPD should use stronger language that ensures adequate space is safeguarded to enable the expansion of the Chipping Norton Health Centre and /or require appropriate healthcare provision (including suitable parking) as part of the overall development. Given the addition of older people's housing both presently and in the future, and population projections, providing adequate healthcare infrastructure is essential.

### Utilities

Thames Water notes that the water and wastewater network capacities in this area are unlikely to be able to support the anticipated demand from this development. Strategic and local water supply and wastewater infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. A detailed drainage strategy should be submitted with the planning application. With regards to impacts on the sewage network, Thames Water also acknowledge that a Sewer Impact Study was completed however due to changes in the scale of the development, additional modelling is required to confirm if the existing sewerage network has available capacity.

As previously mentioned contributions towards the cost of increasing household waste recycling capacity in or near to Chipping Norton will also be needed.

### Sustainable design and construction

A number of comments also identify sustainable/'eco' infrastructure features that the SPD should require. These include: electric vehicle charging points throughout the SDA; carefully considered and designed Sustainable Drainage Systems (SUDS) as well as improvements to existing SUDS; solar panels; grey water barrels; and green roofs. Furthermore, houses should not use gas.

### *Community infrastructure*

With regards to community infrastructure, the development of the SDA should help contribute towards: an extension to Glyme Hall and sports centre, including parking; improvements to the Town Hall, library, museum and visitor information centre; streetscene improvements in the town centre; upgrades to existing public toilets, playgrounds and carparks; affordable/subsidised access to leisure and recreational facilities; new art gallery, studio space, hireable creative space; a new, large supermarket with parking; a war memorial; public gardens; spa; expansion/improvement to The Lido; expansion of The Theatre and/or an outdoor amphitheatre; new junior pitch, clubhouse and general funding for the Chipping Norton Rugby Union Football Club. Thames Valley Police have also requested funds for Policing, including but not limited to staff set up costs, fleet and vehicles, Automatic Number Plate Recognition cameras, Mobile ICT provision and property requirements as previously discussed in this report.

### *Transport infrastructure*

Additional parking provision within the town is the primary concern of many respondents, possibly done through a double-deck car park on New Street.

With further regard to public transportation, the town shuttle bus should receive additional funding for service route expansion. Buses on existing routes should also be upgraded to electric buses. To further address traffic congestion and air quality, a Chipping Norton Park and Ride facility should also be considered. To support increased bus services, overnight bus parking facilities should also be delivered.

## Other General Comments

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### **Public consultation methodology**

Several comments were also received with regards to the consultation methodology. For some, the Issues Paper and exhibitions were inaccessible. Language was jargon-heavy and technical, while the physical location and availability of documents limited their accessibility. For older people interested in the consultation, online engagement could be difficult for non-internet users and exhibition panels were not legible enough for those with poor vision or limited mobility to get to the venues. Paper copies of the Issues Paper should have been made available for exhibition attendees who could not access the internet, physically get to the deposit locations, or read the exhibition panels.

Consultation material was only produced in English, excluding any non-english speakers. Some found the consultation material boring and generally, the consultation was uninteresting to young people.

Additional figures should have been included to further illustrate the contents of the Issues Paper within the document and also at exhibitions. Illustrations within the Issues Paper also lacked legends and were not easily understood.

More detail regarding the timeline for the development and how the consultation process relates to the SPD was also requested. Opportunities for future engagement could have been included with the outcomes of each stage of the SPD process clearly stated.