

JPPC ref: LS/6191

Community Development Officer  
West Oxfordshire District Council

By email

19<sup>th</sup> October 2020

Dear Sir/Madam,

**CHARLBURY NEIGHBOURHOOD PLAN 2031– REGULATION 16  
CONSULTATION**

Thank you for the opportunity to comment on the Charlbury Neighbourhood Plan (CNP). We write to make comments on behalf of HDH Wills 1965 Charitable Trust, 'the Trust', in relation to the Submission Draft version of the Plan dated 6<sup>th</sup> August 2020.

The Trust has a large land holding to the north east of Charlbury, locally known as The Ditchley Estate, so is pleased to comment on the latest version of the Neighbourhood Plan. The level of work involved in preparing a Neighbourhood Plan is acknowledged and the importance of local communities being able to plan positively for development and identify and address the issues that are important to them. We applaud the work of the Neighbourhood Plan Group in preparing their plan and welcome its positive approach to development throughout the CNP area.

The Trust is supportive of the six main aims of the CNP as set out at paragraph 3.1 of the Plan.

The proposed changes to policy CH1: 'Meeting the needs of the parish of Charlbury', are supported as this allows for a more appropriately permissive policy which will help to ensure that appropriate development, recognised as being essential to support local services and facilities, is not stifled. The change to policy CH2: 'Affordable Homes' to bring the policy in line with adopted local plan policy H3 is supported. Policy CH6: 'Size and type of homes' remains an overly prescriptive policy which offers no flexibility should there be a change in the size and type of homes required in Charlbury during the plan period. Policy CH7: 'Mix of affordable rented housing' offers a greater degree of flexibility based on relevant evidence and policy CH6 should have the same flexible approach.

Policy ECT2 should be amended to reflect recent changes in national planning policy providing support for the change of use of retail premises to other uses. In cases where planning permission is required for such

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changes, Vacant Building Credit is an existing tool which deals with redevelopment of vacant sites and the need to provide affordable housing to ensure that brownfield redevelopment does not result in unnecessary burdens. The policy is therefore at odds with national policy and thus unnecessary.

Policy NE6: 'Blue/Green Infrastructure' goes beyond what is set out in Local Plan policy EH3. Existing legislation already provides protection for biodiversity features and thus any development proposals would be subject to that existing legislation. There is no need for duplication in planning policy. No special circumstances exist in Charlbury that would seem to justify a special approach. The effects of a minor conflict/tension between policies caused by an unnecessary policy would be undesirable.

The identification of Local Green Spaces as set out in policy NE7: Local Green Space is supported where such spaces meet the requirements of Paragraph 100 of the NPPF. Areas of land already protected by existing policy designations should only be designated if additional local benefit would be gained by designation as a Local Green Space so as to maintain existing levels of provision. There is no need for the policy to go further or 'allocate' additional areas.

We trust that these comments will be given consideration and look forward to acknowledgement of safe receipt of this letter.

Yours faithfully



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