

**West Oxfordshire District Council
Draft Core Strategy
Summary of Responses from Agents and Organisations**

Bampton Environmental Watch Group (BEWG)

- No large scale developments are appropriate for Bampton – small windfall sites and small rural exception sites only;
- Concerned about the downstream flood risk from further development at Carterton – either east or west. The bullet point referring to flood risk in Witney (Policy CS5) should be repeated in the Carterton Policy CS7;
- Promotion of public transport in rural areas must include increased availability, including evenings and weekends;
- New infrastructure should precede new developments.

Barton Willmore representing:

a) Archstone Land Ltd (land south of Walterbush Road, Chipping Norton)

- Support for broad strategy and deletion of strategic site to east of Chipping Norton;
- Seeks a moderate increase in the housing target for Chipping Norton (ie a minimum of 450 homes);
- The Core Strategy should include a clear steer about the potential for new housing south of Walterbush Road.

b) J.A. Pye (Oxford Ltd) and the Blenheim Estate

- Comments on a wide range of policies raising some minor points as well as more fundamental issues. The Sustainability Appraisal is considered too broad brush;
- Seeks a specific policy which will enable the implementation of works identified in the Management Plan for the World Heritage Site (WHS) to help maintain and enhance the WHS. The bulk of the response is devoted to the difficulty of maintaining a WHS where identified costs exceed income. Lottery funding has not been awarded to this privately owned estate. Other sources of funding such as through development need to be identified;
- The Core Strategy is considered unsound as amount and distribution of housing proposed, particularly in the Rural Service Centres, is significantly below what is actually required to meet housing and community needs during the plan period. Policies CS1 and CS4 are objected to – the overall housing target should be 9,000 homes and not 4,300. Affordable housing need alone is higher than the proposed overall housing target. The Core Strategy's annual build rate is less than the South East Plan pro rata rate;
- Sites in Woodstock and Long Hanborough are proposed for development (about 350 homes in total) - the SHLAA conclusions are not accepted. It is argued that without provision for relocation within the town the Old Woodstock Town Football Club may need to move away. Pye is also promoting land on the western side of Eynsham for about 20 homes (Fruitlands);
- Some modification of the vision for rural settlements is suggested;
- Considers Policy CS9 on type of new homes is contrary to national policy;

- Seeking “at least 50% affordable housing” in Policy CS10 is unrealistic and too onerous. The different targets are considered to be confusing;
- Policies on the economy and town centres, natural environment, green infrastructure and biodiversity are generally supported;
- Some clarification requested on our approach to accommodating groups of wind turbines;
- Policy CS26 on transport is considered unduly lengthy;
- Although no in principle objections are raised to Policy CS27 on Infrastructure, explicit recognition is requested that all contributions are subject to economic viability of the proposed development.

c) Oxfordshire Land (West Witney SDA)

- General support for the vision, objectives and policies, particularly for Witney;
- Objects to the 10 hectares of employment land at West Witney being regarded as a minimum rather than a ceiling. Also objects to the employment priorities identified in Policy CS6 a) & c)ii as these are considered to unnecessarily fetter the market. The reference to retention and modernisation of existing employment sites should state “where possible”;
- The Downs Road junction should not be described as a “prerequisite” rather as being “provided as part of the phased construction of development and supporting infrastructure”.
- Considers Policy CS9 on type of new homes is contrary to national policy;
- Seeking “at least 50% affordable housing” in Policy CS10 is unrealistic and too onerous. It could have a negative impact upon site viability and the delivery of balanced new communities which need a wide range of supporting infrastructure. The different targets are considered to be confusing. There should be individual targets for particular towns and sub-areas;
- Some clarification requested on our approach to accommodating groups of wind turbines;
- There are significant questions over the viability of biomass as a low carbon fuel, not only about the fuel itself but about the capability of the technology. The link between CHP and Code Level 4 should be separated in Policy CS21.
- The need to include policies on the natural environment and biodiversity is questioned;
- Although no in principle objections are raised to Policy CS27 on Infrastructure, explicit recognition is requested that all contributions are subject to economic viability of the proposed development.

Berks, Bucks & Oxon Wildlife Trust (BBOWT)

- General support;
- Recommend wording changes to more closely reflect guidance in PPS9, the NERC Act and the South East Biodiversity Strategy;
- Need to strengthen the role of Conservation Target Areas.

Berry Morris representing Messrs CR Strainge, Curbridge

- Support is given to the West Witney SDA proposals with preference expressed for a grade separated all movements junction;

- Part of the Strainge land holding west of Downs Road is offered for development if needed.

Bidwells representing Cornbury Park Estate

- Supports Policy C16 but considers the emphasis should be on large county estates. Their existence needs to be specifically highlighted, including in Policies CS1 and CS2;
- Supports rural affordable housing schemes but suggests that cross subsidy open market housing should be permitted in appropriate circumstances to help delivery;
- Conversion of existing buildings or part redevelopment of existing employment sites to residential should be permitted where it would help reduce commuting (policies CS13 and CS15).

Cala Homes (R Bellamy)

- Spatial strategy is too concentrated (too much at Witney and Carterton) – a more dispersed strategy would ensure that adequate and necessary growth is directed to smaller towns and villages. Insufficient housing provision is made to achieve the stated objective of achieving sustainable rural communities;
- Witney growth and increased congestion could affect the whole of the town negatively;
- Insufficient housing provision made at Chipping Norton – full schools should not be used as an excuse to stop needed growth, they should be expanded;
- It should not be assumed that small households will require small houses – need for more flexibility. Low numbers of houses proposed will repeat the past failure to deliver anything like the number of affordable dwellings needed.

Carter Jonas representing the East Witney Land Consortium

- Supports the overall spatial strategy;
- The housing target in Policy CS4 needs to be adjusted/increased to cover the years up to 2027/28 with the target for Witney increased;
- More than one strategic site will be needed in Witney. Land to the west is not the most sustainable and deliverable option. Land to the east is more sustainable and should be allocated for development first (for 450 homes) with a further strategic site released later in the plan period;
- It is totally unsound for the Council to base decisions on the delivery of the Cogges Link Road (CLR) – there is absolutely no certainty that the CLR will proceed and should be removed as a priority scheme. The road conflicts with policy to protect the Windrush Valley. The Core Strategy should focus on modal shift, network management and making best use of existing infrastructure;
- Safeguarding of the A40 Shores Green junction upgrade and West End Link is supported;
- It should be made clear that development will be steered away from areas with a higher risk of flooding;
- Objects to the proposed new employment land in the west and proposes an employment site on the eastern side off Jubilee Way to give a better balance to the town;

- The increased requirement for affordable housing from the Local Plan figure of 30% to 'at least 50%' on undeveloped sites is unrealistic and not consistent with the South East Plan target;
- Comments on the appraisal of options in the Sustainability Appraisal.

Carter Jonas (James Bainbridge)

- Core Strategy concentrates too much on the Main Service Centres. Future viability of the Rural Service Centres is vital for the District as a whole, some are 'stagnating' - the strategy should identify where growth will be required and the level of that growth. This needs to be planned through the Core Strategy;
- The requirement for affordable housing in rural areas is unlikely to be fulfilled unless allocations for private housing are made. There is, and has been, too much reliance on Rural Exception Sites.

Carterton Football Club

- Highlights the key issues and challenges the Club faces from a facilities point of view and suggests alternative ways forward. Biggest day to day issue is provision of sufficient pitches for matches and training for 25 teams and the Mini Soccer Centre that the Club supports. Local pressure is likely to increase as the RAF may need to move off base for football matches;
- Land allocated for housing is within a short distance of the Club. In future vehicular access will be through residential areas. These changes, together with noise and light pollution generated by the Club, bring into question the sustainability of operating the Club in its current location. Parking is inadequate for big occasions. Risks will be increased if the housing boundary moves closer to the Club under the northern option;
- The Club's buildings are showing their age and do not meet present needs;
- The lowest cost solution is to provide more pitches to the west of the Club. However this will not address other concerns re access and proximity to housing. Vehicular access could be addressed by a new access directly off the proposed Shilton Road Link;
- The ultimate solution although costly is to find a suitable site and relocate the whole operation (requirements and costs specified). Because much of the land surrounding Carterton is rolling farmland the options are limited – land to the east of Monahan Way (next to existing playing fields) or west of Carterton. As land off Alvescot Road is not all flat either more land or extensive levelling would be required to fit all the pitches in here;
- It is important to take these factors into account when deciding on future housing development.

Cluttons representing All Souls College, Oxford

- Objects to Policy CS23 on Green Infrastructure. Policy should allow some flexibility for the relocation of existing facilities where appropriate (revised policy wording suggested). The College wishes to relocate the Newland Cricket ground.

Cotswolds Conservation Board

- Supports the vision and objectives;

- Welcomes Policies CS3 and CS24 and the reference to AONB guidance documents. Mention should be made that the Council has endorsed the AONB Management Plan as supplementary guidance under the provisions of PPS12;
- Notes that no specific allocation is proposed at Chipping Norton and that development opportunities are constrained by the AONB designation. Agrees with the SHLAA that some limited residential development south of Walterbush Road could be beneficial in enhancing the setting of the town and AONB;
- Is disappointed that Policy CS14 includes no restriction on the size of replacement dwellings in the open countryside. It would be consistent with Development Plan Policies elsewhere in the AONB for replacement dwellings to be required to be 'similar' in size and scale to the dwelling being replaced. This would have the benefit of maintaining the supply of smaller homes as well as environmental benefits.

CPRE (West Oxon)

- Support for the strategy in general terms although the challenges facing West Oxon are not spelt out as forcefully as they should be;
- Main concern is how Carterton growth might be managed. Would rather see smaller developments than a strategic site of 1000+ houses. Land between E. Carterton and W. Witney should be afforded special protection from development;
- Expansion of RAF Brize Norton may well put more strain on local services and infrastructure than has been envisaged;
- Opposes the Cogges Link Road as not considered a solution to Witney's most pressing traffic problems. Downs Road junction supported;
- Alterations to existing buildings should include enhanced insulation, thermal efficiency, water use and permeable landscaping;
- Preference should be given to solar panels on existing structures, particularly in urban areas, with new installations on the ground in the countryside minimised;
- Provision of infrastructure in the past has lagged well behind development. More school places, an enhanced road network and access to shops and services other than by private car will be vital if the quality of life in West Oxon is not to suffer because of the population increase.

Defence Estates Operations North (MoD)

- Where possible the MoD will seek to work with WODC, OCC and other key stakeholders to ensure that the strengths of the airbase are built upon, the investment opportunities are realised and the weaknesses and threats are reduced (reference to the Core Strategy's SWOT analysis);
- The role of RAF Brize Norton should be strengthened in the Carterton subsection with a statement that development required for military purposes will be supported;
- Land to the east is within close proximity of the airbase and abuts hangers 86 & 87 which are to be refurbished and extended for continued military occupation. A buffer will be required which is free from development to ensure the safe military use of this site. Close co-operation with the MoD will be required if Carterton East is the favoured option – attenuation ponds could increase the threat of bird strike.

- As regards affordable housing there is no mention that this policy does not apply to service personnel accommodation for key workers. The range of housing will respond to military needs.

Drivers Jonas Deloitte representing the Universities Superannuation Scheme (USS) (owners of the Woolgate Centre, Witney)

- Supports the town centre policy approach for Witney. This should be reflected in Policy CS5;
- Does not consider there is justification to extend the town centre to the south of Welch Way as there is sufficient potential within the existing town centre - this area should be deleted from policy;
- In Policy CS18 Carterton should be designated a District Centre and Chipping Norton a Secondary Town Centre (after the Principal Town Centre of Witney);
- Policy CS20 should focus on the need to reduce energy consumption by improvements through energy conservation.

Entec representing National Grid

- General comments and information.

Environment Agency

- General support for objectives and policies relevant to the Agency's remit;
- Suggests Policies CS21 and 22 could be combined;
- Recommends that the River Basin Management Plan be added as key evidence.

Fine Print, Range Road, Witney

- Broadly supports the West Witney Development Area but requests the interaction between business (operating 24 hour days) and housing be considered;
- Strongly support the new West Witney junction but the major identified weakness of the A40 congestion represents 'the elephant in the room' that the core strategy largely ignores. A key area of congestion is between Witney and Cassington which is in West Oxfordshire – the Council should be taking a firmer position in pushing for a resolution to this congestion.

Friends, Families and Travellers (FFT) Planning

- Policy CS12 for travelling communities is welcomed but some amendments required. It is not considered to comply with current national and regional guidance;
- The policy does not commit the Council to making provision through site allocation nor set a target for additional pitches. It will not meet needs. This is inconsistent as a target has been set for conventional housing;
- Some concerns expressed about the interpretation of the specific policy criteria.

First City Ltd representing the North Witney Consortium

- The Council's consideration and appraisal of the merits of potential locations for urban extensions to Witney is considered unsound;
- Land at North Witney should be identified as a sustainable urban extension 'reserve site' for about 1,500 homes. The wording for a draft policy is suggested;

- A document has been submitted promoting North Witney and entitled “It’s a decision you’ll live with for a long time ...”;
- The delivery of affordable housing and key infrastructure improvements are identified as key elements.

HBF

- Objects to the housing target considering it should be higher. It should reflect more recent evidence from ONS projections (*Officer comment- completion figures since 2006 are quoted by the HBF which are not total completions eg conversions are excluded*);
- The proposed annual average building rate is significantly below the RSS annual rate. The strategy gives little weight to the Government’s growth agenda;
- Housing supply should be increased to accommodate in-migration and provide more affordable market housing, particularly to accommodate younger and economically active households;
- Policy CS9 in prescribing the type, tenure and size of homes is contrary to national policy;
- Policy CS10 for affordable housing, particularly the 50% target, is not defensible. There is no evidence that this is supportable in Witney or Carterton;
- Policy CS20 on ‘development design for renewable energy’ is contrary to the direction of Government policy and current national guidance. Policies should be flexible;
- Policy CS21 on sustainable construction is superfluous as mandatory building regulations will deliver zero carbon homes from 2016 onwards.

Highways Agency

- Broadly content with the housing, employment and transport policies and the proposed distribution of development;
- WODC should continue to work closely with neighbouring District Councils and Highway Authorities to identify and deliver infrastructure in order to prevent and alleviate congestion.

Hives Planning representing the Oxford Diocesan Board of Finance

- Main objection is that the draft strategy does not sufficiently guide development in the rural areas;
- Generally support draft spatial strategy but additional text required to say that development should be expected to maintain the viability and vitality of rural areas. Sites already suggested by the Board could help in delivery of new housing;
- Policy CS2 should specifically allow rounding-off in Rural Service Centres and Villages as the wording is overly restrictive. Policy also refers to sites in the Villages category being specifically identified to help meet local needs – this should not mean affordable housing only. Support of local communities/parish councils could be interpreted as identification of local needs (localism). Revised wording sought;
- Policy CS4 and the housing target should cover the plan period up to 2007/8. It is not clear whether the 4,300 dwellings to be provided includes the 1,200 homes

already committed. The location for the remaining housing outside the three towns should be clarified and linked to Policy CS2;

- General support is given to ‘equivalent financial contributions’ for affordable housing in Policy CS10 but not the reference to use where it would ‘address local housing needs more effectively’. It should be acknowledged that in some cases it may not be physically possible to provide affordable housing on site or it is not economically feasible;
- Policies such as CS10 and CS21 should refer to independent viability assessment rather than open book accountancy;
- Community uses should be clearly defined as to what they include. In CS27 Infrastructure the last phrase referring to ‘is incapable of being made viable or adapted’ is considered onerous and should be deleted.

John D Wood and Co representing Mr N Colston

- Strategy fails to provide for the long term infrastructure of Chipping Norton. An eastern link road should be created connecting the A44, B4026/A361 and B4450 from the north east to the south west of the town. This would remove a significant proportion of through traffic from the town centre and provide future development opportunities beyond the lifetime of the core strategy;
- Land south of Churchill Road is considered to be a sustainable site for development.

John Phillips Planning Consultancy representing Sabre Property Developments

- Objection is to policy CS2 and Appendix 4 that Old Minster Lovell should not be separated from the rest of the settlement of Minster Lovell. It is a sustainable location with good access to public transport and local facilities and therefore an appropriate location for new development.
- If a division is made, it should be that those parts of Old Minster Lovell north of the River Windrush are unsuitable for development due to their separation from the remainder of the village.

JWPC representing Gleeson Developments (a member of the North Witney Consortium)

- Comments supplement those made by First City Ltd;
- Supports core objectives and overall housing target but considers no reliance should be placed on windfall sites coming forward. More reliance should be placed on identifying and allocating strategic development sites;
- Objects to further strategic growth being directed to Carterton and has fundamental concerns about the ability of the town to accommodate large numbers of houses. The West Carterton option will do nothing to improve the sustainability of the town nor will it help improve local infrastructure – the costs of on-site infrastructure will be high. The East Carterton site is constrained, in open and highly visible landscape, and it is questionable whether a sustainable community could be delivered here;
- Witney is the most sustainable location for further development – not Carterton. North Witney is a more sustainable location than West Witney and should be prioritised over that option;

- It is accepted that improvements to the highway infrastructure are needed. Development at North Witney can help deliver the West End Link road as the development consortium controls the majority of the safeguarded land for the route. Its provision will help part alleviate existing traffic conditions in the centre of Witney;
- Development at North Witney would also address and help alleviate previous flooding problems in the surrounding area.

Kemp & Kemp

- Proposes about 300-400 dwellings on land west of Eynsham (north of Chilbridge Road, including school playing fields). This is the only realistic option to accommodate the quantity of housing envisaged;
- Eynsham should be identified as a Main Service Centre (along with Witney, Carterton and Chipping Norton) - it is equal in terms of sustainability criteria. It is inappropriate to include Eynsham within the group of rural service centres;
- The Core Strategy should reflect the Central Oxon housing target of the South East Plan and increase provision in the Eynsham-Woodstock-Long Hanborough area. Unlike Eynsham, opportunities at both Woodstock and Long Hanborough are severely limited by environmental constraints (SHLAA assessment);
- Committed sites and windfalls should not be taken into account in calculating the amount of land required over the plan period. Various calculations on the amount of land to be allocated at Eynsham with a minimum of 311 dwellings;
- The housing figures in the South East Plan significantly undershoot the identified 'need' and should be regarded as the absolute minimum. The Council's Housing Needs Assessment shows an annual need of 2,065 units. The Council's proposals will not meet identified local need.

Morston Assets

- Supports identification of Witney as a Main Service Centre. However brownfield and infill sites should be given priority;
- Land to the south of the A40 and west of A415 is well related to the existing town and should be considered as part of the urban area. It should be excluded from the strategic policy gap designation under Local Plan Policy NE2 and the settlement boundary redrawn on a modest scale southwards following New Close Lane.

National Farmers Union

- The strategy should encourage the conversion of redundant farm buildings into affordable housing for local people (the Government's "Homes on the Farm");
- Supports the section on farm diversification;
- Supports policies that encourage renewable energy projects. With biomass based projects, the difficulty is ensuring adequate fuel supplies before investment is made in generating plant.

Natural England

- Generally supports policies on green infrastructure, natural environment and biodiversity;

- Suggests it be made clear that the Council has endorsed the AONB Management Plan as supplementary guidance;
- Recommends that the last bullet point of Policy CS25 be reworded to clarify 'specially protected species' (wording put forward).

Old Woodstock Town Football Club

- Has long term plans for promotion to Southern League but becoming increasingly worried about the future. Without floodlighting first team matches are forced to play at North Leigh which has resulted in lower attendances;
- Need to give serious consideration to finding a new home in Woodstock with better facilities for the local community. Discussions have been held with Blenheim Estates over a new site with some developer funding. Support is given to an allocation for housing on land to the east of Woodstock, to include making specific provision for sporting and recreation development.

Oxford City

(Officer comment - Oxford City understood the Core Strategy plan period to be 2006-2026 which is not the case. The following should be read in the context of a housing target understood to be less than the target in the South East Plan)

- Key assumptions are that there is limited capacity of West Oxfordshire to sustainably accommodate further significant growth together with the inadequacy of existing infrastructure – the main elements of the background evidence to support this should be spelt out at the beginning of the Core Strategy;
- The strategy is based on 'natural' growth forecast scenarios which does not appear to take into account future population growth through migration that will add to the demand for housing from those living outside the District. Evidence suggests there will be a significant increase in population growth whereas the scale of housing provision is minimal;
- It would be helpful if the Core Strategy made reference to the wider spatial setting of Oxfordshire;
- A housing target significantly less than the South East Plan target potentially places added pressure on neighbouring district authorities;
- It is surprising that the policy on the retention of existing housing is not stricter;
- The strategy appears to constrain employment growth as little additional land is allocated for new employment. This will not promote sustainable economic prosperity for West Oxfordshire and will not reduce commuting.

Oxfordshire Badger Group

- Comments received that Badger Setts have been identified within and in the vicinity of Land at Alvescot Downs (West Carterton site). Recommend a full ecological survey before any planning permission and mitigation measures if setts affected.

Oxfordshire County Council (OCC)

- Expresses broad support for the emerging core strategy. The housing target is considered in line with government advice on local determination of targets;
- Will not require a third secondary school for the west side of Witney to meet the housing provided in West Oxfordshire's strategy (*Officer comment – this is*

based on the assumption that the housing numbers in the Core Strategy are not changed);

- Would prefer expansion of Carterton on its eastern side, but would alternatively accept development on the western side provided that the necessary transport/movement connections can be made (as detailed in the response). OCC also states: “We still do not know the full implications of the proposed relocation of personnel, staff and families from RAF Lyneham to Brize for school place provision. There is an expectation that the children that come with the relocation will fill up current empty places at existing primary schools and occupy places currently available at Carterton Community College”.
- Would welcome a reference to provision of land for new housing being made available on the east side of Chipping Norton. OCC also states: “The two existing schools may just be able to accommodate the additional children expected to be generated from the new development (*ie about 400 homes*) but it would be very tight, leaving little flexibility for fluctuations in year groups”.
- Offers additional more detailed comments as set out in Annexes 1 and 2 to the response.

Persimmon Homes

- Generally support the overarching aims and a strategy based on concentration although one of the main challenges facing the District is underplayed in the SWOT analysis – how to support the 130 separate towns, villages and hamlets. The housing target makes insufficient provision outside the 3 main towns to support the rural settlements and meet the aims of the Community Strategy and Policy CS1;
- There are rural sites identified in the SHLAA that will be excluded simply due to the restriction caused by the housing numbers – this would appear to be conflict with the emerging localism agenda and Policy CS4. The Core Strategy should say how this issue will be addressed;
- Object to development in the Burford-Charlbury sub-area being “very limited in scale” and suggest the wording should be the same as for the Eynsham-Woodstock sub-area;
- Paragraph c) in the third column of Policy CS2 appears to preclude sites outside rural service centres. It needs to be clear that this will only apply to sites other than allocated sites.

Porta Planning representing Eton College

- General support for overall spatial strategy and settlement hierarchy;
- Housing targets should be prefaced by ‘at least’ to ensure consistency throughout the document;
- Witney’s housing target supported but objects to Eton College’s land north of Church Lane being included within the ‘Windrush in Witney Policy Area’ - it should be excluded and designated for housing;
- Rural Exception Site policy should take into account the viability of schemes.

Ramblers Association

- There is a shortage of rights of way in the open countryside west of Carterton. The path south of Shilton church should be preserved as open space if this development area goes ahead.

RPS Planning representing:

a) Banner Homes Ltd

- Promotes residential development on land to east of Chipping Norton (between the town allotments and London Road) which should be identified as a strategic location in the Core Strategy;
- Considers a higher housing target should be set using the national 2008-based household projections as its starting point. The GLA Demographic Projections Report is considered technically unsound. The figure of 4,300 new homes is inadequate and not justified. In addition the implied annual rate is substantially less than the South East Plan annual rate;
- Support for strategy to concentrate development at the main service centres, including Chipping Norton. If the overall housing target is increased there should be no diminution in the proportion of the total allocated to Chipping Norton;
- Even if the housing figure for Chipping Norton is unchanged the residual housing requirement is still large enough to warrant the identification of either a strategic allocation or a strategic location. It is not clear from the Core Strategy whether or not the residual housing requirement is expected to be wholly met from sites within the built-up area. No substantial justification has been provided for the decision not to identify a strategic site at Chipping Norton;
- Agree with the SHLAA conclusions but not that there is capacity on the eastern side for only 250 dwellings. More development could be accommodated without having adverse impacts on the landscape;
- Do not consider the education implications of further housing have been properly addressed. Land on the eastern side could provide a new primary school if necessary;
- The AONB designation covering other fringe sites should be regarded as a dominant constraint – the Sustainability Appraisal is flawed in this respect;
- Our experience is that 40% affordable housing is the maximum that should be sought.

b) Robin Beechener (Minster Lovell)

- Largely supportive in regard to broad approach but elements leave the approach unsound;
- Future provision of affordable housing on sites outside the three main settlements is simply left to market forces. Unless it is linked to normal market housing it will not be provided, to the detriment of villages. (*Officer comment - Policy CS2 seems to have been interpreted as limiting housing outside the three towns to affordable only which is not the intention*);
- Supportive of at least 1,500 new dwellings at Witney, with 1,000 to the west as a new urban extension. The additional dwellings should be on unspecified sites not just elsewhere around the town but in its satellite villages;

- Promotes a site for about 100 dwellings to the west of Brize Norton Road, Minster Lovell and argues this is the only viable opportunity of a reasonable scale remaining in the village to help support local services. Minster Lovell is the 11th most sustainable settlement in West Oxon but has had very little development despite being so well located to Witney and Carterton. Its affordable housing needs have not been met. Argues that sites to the north, south and east of Witney are more constrained;
- Continuing the past windfall development in the small villages and without a contribution to affordable housing cannot be sustainable;
- New development should take advantage of existing transport corridors – Minster Lovell has good bus services and cycle and pedestrian linkages.

c) Thames Valley Policy Authority (TVPA)

- Disappointed that previous comments do not appear to have been taken into account (previous comments emphasised the vital contribution the Police make to necessary social infrastructure to support development and sought financial contributions from development);
- The following Core Strategy objective should be added: *Ensure existing and new communities are inclusive, healthy, safe and crime free;*
- It would be helpful if Policy CS3 referenced the design advice prepared by TVPA – ‘The Compendium of Crime Prevention in the Planning System’;
- A very narrow view of infrastructure requirements is presented in the policies for the main service centres. There should be a link to the Infrastructure Policy CS27 or, preferably, a general requirement for new development to provide or contribute to the necessary supporting infrastructure to meet the Core Strategy objective for sustainable communities. The following wording is suggested ‘Provision is made, or contributions are provided, towards the necessary supporting infrastructure’;
- Policy CS27 on Infrastructure is supported but it is suggested the second bullet point be reworded to say: “Ensure service infrastructure needed to meet the day-to-day needs of the population (for example, schools, policing, affordable housing, community facilities, open space etc). Also suggests the supporting text lists the relevant delivery agencies.

Satnam Investments Ltd

- Request the Core Strategy makes provision for further growth at Enstone which is able to support a subsequent Site Allocations document specifying residential development at Cox’s Lane;
- The site is shown as suitable and available in the SHLAA.
(Note – planning application subsequently submitted)

Savills representing:

a) Sharba Homes Ltd and Cottsway Housing Association

- Promotes residential development at West End Farm, Churchill Road, Chipping Norton although recognises that this site is not large enough to be allocated as a strategic site;

- The approach being followed by the Council is considered to be generally consistent with Government Guidance. The depth and high standard of the evidence base is commended;
- Supports Policy CS1 but considers second paragraph should be deleted as it is covered by Policy CS2. The settlement hierarchy is supported;
- Text should clarify whether the target of 4,300 homes includes existing commitments or not. The target in Policy CS4 should be increased to cover the years up to 2028 (at least 15 years from the date of adoption) with an increase in the figure for Chipping Norton;
- Other than an alleged shortage in education facilities no justification is given for the reduction in Chipping Norton's housing target compared to the previous versions of the Core Strategy (the Preferred Approach included "a minimum of 800 new homes" for the 20 years 2006-2026). It is argued that the Town Council supported a higher level of growth. The reduction in housing provision for the town is confusing, vague and unsubstantiated. There is no direct correlation between housing numbers and levels of children of school age per se. Objects to Policy CS4;
- It is unclear whether existing schools can cope with 400 dwellings. It is more proactive for a higher number of houses to be accommodated so improvement in education facilities becomes more viable. Growth of the town is being constrained by a lack of capacity in the local schools and the Core Strategy's short-term approach. Local housing needs will not be met;
- Existing housing commitments in Chipping Norton are unlikely to deliver 150 dwellings;
- Objects to the scale of growth at Witney and Carterton;
- Support for Extra Care Homes provision but argues that these units are in C2 use class and therefore should not be counted in the housing target;
- The 50% affordable housing target specified in Policy CS10 does not reflect the conclusions of the evidence base and should be amended to be "at least 35% in Witney, Carterton and Chipping Norton on undeveloped sites";
- In general the approach taken in the Infrastructure Policy CS27 is supported provided it is applied equally across the District;
- The Sustainability Appraisal does not set out or consider all alternative locations for development in and around Chipping Norton and is therefore considered flawed (*Officer comment – sites are considered in the SHLAA*).

b) Willstow Developments Ltd

- Comments relate specifically to Chipping Norton and reflect the Savills representation above particularly regarding Policies CS1, CS2, CS4 (housing target) and the percentages and wording of CS10 (affordable housing).

c) Corpus Christi College

- Comments relate specifically to land in and around Long Hanborough;
- The College supports the overall spatial strategy and the settlement hierarchy. Policy CS2 should reflect the Localism Bill and state that some sites will be identified through neighbourhood plans;
- The housing target in Policy CS4 should be increased to cover the years up to 2028;

- Objects to the percentages and wording in Policy CS10. The increased level of 50% affordable housing on greenfield sites is not justified in the evidence base.

Smiths Gore (on behalf of a number of clients)

- Supports the revised broad allocation of housing with less at Chipping Norton which is not an ideal location for significant expansion;
- Has the MOD been required to make realistic contributions to local infrastructure compared to what market developers would be expected to contribute?
- Carterton West preferred – more scope for future growth in a more pleasant environment;
- The 50% affordable housing policy for small sites is not viable and restricts the supply of small sites coming forward – suggests a threshold of five dwellings with one affordable;
- Particular focus should be given to the Eynsham-Woodstock sub-area with more development within easy commute of Oxford by bus or rail. Park and ride at Eynsham supported.

Sport England

- Playing Field Strategies should be updated every 3 years – the current strategy is considered out of date;
- Policy CS3 on design of new development should incorporate the principles of Active Design guidelines;
- The Core Strategy should explicitly recognise the benefits and role of sport in contributing to the vitality and viability of centres;
- Objects to the omission of policies which seek to protect existing sports facilities, both built and non-built, and to promote the provision of new built and non-built sports facilities;
- It is important that policies relating to Green Infrastructure recognise that transient sporting activities take place and that such policies do not restrict such events.

Stephen Bowley representing Pavestone UK Ltd and Smith and Sons (Bletchington) Ltd (Burford Quarry)

- Letter dated 8 February 2011:
 - Pavestone is very concerned about possible future constraints on its operations. The strategic options to the east and west of Carterton are supported. The company is pleased that the northern option has been rejected;
 - In the long term there is potential for commercial development on the floor of the worked out areas of the quarry, including the factory site for manufacture of reconstituted stone and concrete products.
- Letter of 11 March 2011 following an approach to Smith and Sons and Pavestone by representatives of Figbury Ltd promoting development to the north of Carterton:
 - The key issue for the quarry and factory operators is the maintenance of an appropriate amenity buffer zone between ongoing quarrying

- operations and any new residential development. Both parties maintain a holding objection to the northern extension of Carterton at this stage;
- However from initial discussions with Figbury it would appear that phasing of new residential development could be synchronised with the phasing of quarrying in order that an appropriate buffer zone is maintained throughout the life of the quarry.
 - Letter of 31st May 2011 stating that agreement has been reached with Figbury enabling the previous holding objection on behalf of Smith and Sons and Pavestone to be withdrawn subject to certain provisos regarding buffer zones, phasing and the opportunity of a new and improved access to the quarry from Burford Road.

Stephen Pickles on behalf of John Hook, Cote Lodge Farm, Bampton

- Too much of the housing target is allocated to the towns – not enough housing is proposed for the rural service centres and villages to meet the stated vision to keep towns and villages economically prosperous and vibrant. Rural housing needs will not be met and services will continue to decline.
- The allocation outside the 3 towns should be increased from 800 to 1,700 homes. Consideration could be given to reducing the amount of growth at Witney.
- Bampton has scope to accommodate more development without impacting upon important environmental constraints. It could also help ameliorate current flooding problems.
- The requirement for 50% affordable housing on undeveloped sites plus building to Code Level 6 plus infrastructure contributions will make sites unviable. The supply of smaller sites will dry up.
- Insufficient consideration given to village centres. No assessment undertaken of their needs and how the decline in services can be addressed – a significant omission from the evidence base.
- The standards for sustainable construction must be applied flexibly.
- A wider dispersal of development will help reduce impact upon the congested A40.
- Need to consider how income from new rural homes via the New Homes Bonus and Community Infrastructure Levy will help revitalise rural areas.

Strutt Parker representing the Church Commissioners for England

- Policy CS10 should be amended to make it clearer that the Council, once having considered alternative mix and type of housing, as well as grants, would consider lowering the level of affordable housing required if it could be proven that the current level was not viable.

Terence O'Rourke on behalf of the Blenheim Palace Estate

- Comments reflect the separate comments of Barton Willmore representing J.A.Pye and the Blenheim Estate;
- Objects to the omission of a Core Strategy policy that puts in place a clear framework to assist in the delivery of the objectives of the Blenheim Palace World Heritage Site Management Plan. The following wording is suggested:

“The Council will work with the owners of the Estate to ensure that the outstanding universal value of the Blenheim Palace WHS is maintained through the implementation of the adopted Management Plan and its objectives”. Two Management Plan objectives are quoted:

- 24 – Develop a sustainable financial basis with which to support the conservation activities within the WHS, thereby ensuring that adequate management resources and restoration, conservation, maintenance and renovation skills are available.
- 26 – To investigate opportunities for funding, and where appropriate, implementing projects which can help deliver the Plan, including enabling development where appropriate.
- Without policy support within the Core Strategy, the potential for the local community to be guided and respond through any Neighbourhood Plan (if the local community chooses to pursue one) will be significantly restricted, particularly in terms of any response that involves development.

Thames Valley Police (Crime Prevention Design Advisor)

- Welcomes specific text in Policy CS3, the Vision and Strategy for the Future and reference to the Community Strategy priority to reduce crime and anti-social behaviour and the fear of crime These overarching themes should be backed up with a Supplementary Planning Document or Planning Advice Note;
- It could be appropriate to refer to the Home Office publication “Safer Places – The Planning System and Crime Prevention”;
- Crime and the police activity associated with it leads to extra carbon dioxide emissions.

Thames Water

- Supports relevant policies but it should be made clear that adequate drainage and flood mitigation measures are implemented ahead of occupation of development;
- The definition of infrastructure should continue to include water and sewerage infrastructure.

The London Planning Practice Ltd representing Commercial Land

- Delivery of 4,300 homes is strongly dependant upon existing commitments coming forward. Therefore Policy needs to allow consideration of alternative sites if all the 1,200 committed homes do not materialise (wording suggested);
- Policy CS9 seeks a range of housing in ‘both type and location’ yet Policy CS4 steers 81% of the new housing to only three centres. This concentration should be reduced with greater consideration given to sites within the catchment of the rural service centres, such as Eynsham and Burford.

The Theatres Trust

- Comments from 2010 consultation repeated;
- Welcomes support for the District’s only theatre. Pubs can also be transformed as additional performance spaces and help make a vibrant contribution to the evening economy;
- Policy CS17 on Sustainable Tourism should include the protection and enhancement of existing facilities as well as the provision of new;

- The Glossary should include a description of the term ‘community facilities’. The definition of ‘infrastructure’ should be widened to include all the topics covered in the document.

Transition Eynsham Area

- Considers the Core Strategy to be not specific enough;
- Emphasises the need for affordable housing and housing for the elderly;
- Sees no justification for preferentially converting existing buildings ‘for employment, tourism and community uses’ rather than housing or mixed uses. The nearer people can live to their rural jobs the better;
- New housing should be built to at least Code Level 5;
- General support for a variety of sustainable approaches to energy and food production;
- Emphasises the vital importance of all forms of renewable energy generation;
- Vital that existing public transport systems are maintained and improved plus facilities for electric cars installed. Support for re-instatement of Oxford-Witney railway.

Turley Associates representing Sainsbury’s Supermarkets Ltd

- In supporting the enhancement of the roles of Carterton and Chipping Norton further retail development should be actively promoted. Both currently have significant out-commuting for employment and shopping;
- The Retail Need Assessment calculates retail requirements on the basis that shopping patterns remain constant. This is not considered appropriate given the high amount of expenditure outflow from the district;
- Carterton needs a modern food shopping facility to increase its market share and to reduce the current unsustainable travel distances;
- Promotion of the south western quarter of the town centre as a priority should not preclude development of other town centre sites that may come forward;
- Chipping Norton is not currently fulfilling its role as a primary town centre. Given that 80% of expenditure is estimated to leak from the catchment area, the Council should consider the allocation of a site for a new supermarket to serve the town;
- Identification of Witney as ‘principal town centre’ and Carterton and Chipping Norton as ‘primary town centres’ is contrary to PPS4 and ambiguous. They should be designated ‘Town Centres’ in the retail hierarchy, with Burford and Woodstock designated District Centres.

Vale of White Horse District Council

- General support with no objections on substantive strategy matters. The proposed river crossing for the A415 is positively welcomed.

West Witney Users Group (WWUG)

- Comments relate to the potential sale of the Sports Ground by the Town Council. An appropriate context is sought in the Core Strategy in the event that a planning application is submitted;

- Objects to Policy CS6 for the West Witney Strategic Development Area or alternatively seeks the complete removal of the Sports Ground from the Development Area.

Woodstock Action Group (WAG)

- Seeks to protect the character of Woodstock. Opposed to large scale market home developments; promotes small scale affordable housing schemes for qualified local residents. Considers that the town has already fulfilled its immediate housing needs through recent developments;
- Housing target appears realistic but will object to development proposals on land east of Woodstock as well as at Old Woodstock. Agrees that new housing plans should be progressed as neighbourhoods plans with local communities;
- Finds those sections to be acceptable which refer to Woodstock and Blenheim Palace but have reservations about the location of allocated sites.

Note - see separate summary for Carterton Strategic Sites

- Barton Willmore on behalf of David Wilson Homes
- Overbury Planning Consultancy on behalf of Figbury Ltd
- Savills on behalf of Bloor Homes and Christ Church College
- West Waddy on behalf of Crest Nicholson