

**West Oxfordshire District Council
Draft Core Strategy – Further Opportunity to Comment (June-July 2011)**

A. Summary of Responses on Carterton Reports

I. Responses from Agents and Organisations

Barton Willmore on behalf of David Wilson Homes

- Promoting development of up to 300 homes to the north of Carterton - east and west of Swinbrook Road. Could be a complementary proposal to the 750 home scheme at East Carterton. Revised master plan submitted to respond to previous consultation comments, including on minerals and proximity to Football Club.
- West Carterton option - significantly greater infrastructure and mitigation works could impact upon deliverability. Will be separate community. Route across the Shill Brook does not meet recommendations in Manual for Streets and will not encourage walking. East Carterton option more favourable in highway terms. Development limited to 2 storeys only when assessing visual impact. Does not sufficiently consider change in the landscape, impact more than 'slight'. Development will break the skyline when viewed from Shilton. Reliant on substantial landscape screening.
- North Carterton (Figbury) option – separated from town by the country park. Less accessible than David Wilson scheme and closer to the quarry.

Boyer Planning on behalf of Taylor Wimpey

- Promoting development to the north of Witney. Argues Witney is a more sustainable location than Carterton for further development.
- West Carterton option – location beyond the Shill Brook Valley would give the appearance of a new village rather than a sustainable urban extension to Carterton. Would increase traffic through the town accessing the A40.
- East Carterton option – reduced development seems to be the most sustainable option being considered. Development of 1,000 homes would cause unacceptable harm to the rural character of the area whilst also diminishing the important visual separation between Carterton and Brize Norton.

Burford School (Business Manager)

- Opposed to North Carterton (Figbury) option - inadequate roads, bus services will need re-routing, proximity to working quarry.
- Prefers development off Swinbrook Road together with the East option. Need for a buffer between Carterton and Brize Norton village has long since passed.

CPRE (West Oxon)

- Aside from debate over housing targets, strategy of concentration is supported. Asks WODC to reconsider the need for one large extension to Carterton, prefers smaller developments.
- Concerned about creep of development between Carterton and Witney.

- Carterton – no preference expressed for any of the development options. Supports neighbouring village concerns about impact of development upon their rural character, quality of life etc and need for green buffers. Solutions should be able to be found to resolve flooding issues. Concerned about traffic increases in general but not a reason to favour one option over another – expects highway improvements to be made.

Environment Agency

- No objection in principle to the options. Detailed advice for all sites.
- West Carterton option – PPS25 Sequential Test needs to be carried out. More infiltration tests required. Does not favour use of culverts. Detailed comments on Shill Brook Valley.
- Further detailed comments were received in September 2011 relating to revised flood risk assessment for West Carterton site and flooding and ecology comments on Kilkenny Farm site technical documents.

Natural England

- Supports provision of open space that extends Carterton's green infrastructure (east and west options). Need for ecological survey of East option, Kilkenny Farm and David Wilson scheme. Management of Shill Brook needs to be handled sensitively to meet the targets of the South Cotswolds Valleys Conservation Target Area. Proposed open space at Kilkenny Farm and David Wilson scheme does not link in with existing country park – should connect with existing green infrastructure.

Oxfordshire County Council

- No objection to the scale of growth planned for Carterton being increased to 1300 homes (or more in the longer term), provided that development is accompanied by the timely provision of necessary supporting infrastructure
- Preferred option is for a strategic site to be allocated for 1,000 dwellings on land to the east of the town
- Concerned that the affordable housing viability study position statement does not adequately take account of the costs of necessary supporting infrastructure on strategic development sites and that setting the level of affordable housing at 50% on undeveloped sites combined with the costs of necessary infrastructure costs could impact on development viability and deliverability
- Detailed comments on the developers' submitted information on options for Carterton provided which are set out in the accompanying annex 1
 - Transport – Of the developments presented the Highway Authority has a preference for Option 1: 1000 dwellings at East Carterton as this provides the strongest location in relation to a sustainable transport solution. The Highway Authority is not very keen to see development to the north of Carterton due to poor accessibility to key facilities by walking and cycling and limited access to public transport.
 - Archaeology - no known constraints to any sites being identified in LDF subject to desk based/field assessments where necessary.

- Minerals - objections on grounds of minerals sterilisation have been withdrawn – subject to maintaining a buffer to residential properties of 100m to quarry boundary and 350m to working face. David Wilson Homes' site layout reduced so outside 350m buffer. Figbury proposal largely already with 350m buffer of residential properties and so OCC concluded remaining area not economical to work.
- Further detailed comments were received in September 2011 relating to the technical supporting documents submitted for the Figbury Kilkenny Farm proposal.

Overbury Planning Consultancy (Kilkenny Farm)

- Cover letter dated 31st July 2011 noting the following additional studies and reports:
 - Transport Appraisal, Peter Brett Associates July 2011
 - Ecological Assessment, Ecology Solutions July 2011
 - Initial Feasibility Study for Surface and Foul Water Drainage – Baynham Meikle Partnership July 2011
 - Energy and Carbon Reduction Strategy – Brooks Devlin July 2011
 - Correspondence with OCC Minerals regarding Burford Quarry

Savills on behalf of Bloor Homes

- Promoting development to the east of Carterton.
- Letter submitted incorporating revised indicative layouts, on and off site infrastructure funding. Two indicative options are again presented for 1000 dwellings and 750 dwellings respectively. The proposals now include provision for two additional football pitches, allotments and burial/cemetery facilities. These are on site in the 750 dwelling option but in 1000 dwelling option the sports pitches and burial/cemetery facilities are suggested to be provided north of Burford Road.

Terence O'Rourke on behalf of the Blenheim Palace Estate

- Mismatch between scale of development proposed at Carterton and local need and demand for housing at Carterton. Development potential significantly constrained.
- East Carterton option – preferable to other options however constrained by relationship with Brize Norton. Capacity no more than 750 dwellings.
- West Carterton option – poorly related to existing community with no natural containment. Significant sprawl into open countryside.
- North Carterton – poorly related to the town. Proposals to extend northwards criticised by previous Local Plan Inspectors.

West Waddy on behalf of Crest Nicholson

- Promoting development to the west of Carterton.
- Document submitted July 2011 critiquing the studies prepared for the eastern and northern options and benefits of West Carterton option in relation to Ecology, Urban Design, Transport, Landscape, and Drainage/Foul Water.
- Revised Flood Risk Assessment (Revision C) submitted August 2011 indicating that further permeability tests have been carried out, that overland flow from land to the west of the site is proposed to be collected and

conveyed to the site control infiltration basin in the lower half of the site and that the proposed road crossing the Shill Brook would be constructed using a road bridge and not a culvert.

2. Responses from Parish Councils and Parish Meetings

Alvescot Parish Council (submitted by Richard Anstis)

- Continues to strongly object to expansion of Carterton through a strategic site. Confused about which options are being considered by WODC.
- Previous consultation showed the vast majority of responses objected to the west option.
- Critical of Carterton Town Council's decisions and of consultant's report.
- Demographic projections - Only 15% of the overall District need is in Carterton so no need for a large strategic site. Hefty in-migration assumptions still allowed for which have not been borne out by recent history. Lack of robust evidence for a local target.
- Affordable Housing Viability - disagrees with conclusions. Even more difficult now to get large sites off the ground – substantial market obstacles. West option has more risks than alternatives.
- Green Infrastructure Study - West option breaches the objectives.
- West option (further material) – considers revisions point to inadequacies of earlier work.
- Statement received in September 2011 indicating support for the principle of dispersal and to work with the District Council to identify and assess sites within the parish.

Black Bourton Parish Council

- Statement received in October 2011 indicating support for the principle of dispersal and to work with the District Council to identify and assess sites within the parish.

Brize Norton Parish Council

- Continues to strongly object to expansion of Carterton into any neighbouring parishes. Rejects need for this scale of growth however would be better located near good road and rail connections. Considerable development potential within the town.
- Latest East Carterton scheme - Amended Savills scheme completely unacceptable. All previous arguments still stand. Already suffer from noise at existing playing fields off Monahan Way. Flooding issues not adequately addressed. There are no benefits for the village. Complete disregard is shown to the residents of Burford Road. The village already has a cemetery. Doubtful whether hard ground off Monahan Way is appropriate for burials. Eastern option is too small to provide facilities envisaged.
- David Wilson Homes scheme – urban sprawl.
- Figbury/Kilkenny Farm scheme – urban sprawl that would create a dormitory settlement separate from Carterton. Kilkenny Country Park was designed to stop this from happening. Area remote, on rising ground and too close to working quarry. Small rural road. Unsuitable and unsustainable location which is likely to create nearly 100% out commuting for jobs and shopping.

Flooding issues not adequately addressed. Effectively joins up Shilton and Brize Norton to Carterton. There are no benefits.

- West Carterton scheme – this is the only option that would help regenerate Carterton town centre (a stated aim). Area more spacious. Opportunities to create new country park although still concerns over flood risk.

Broadwell Parish Meeting

- Still opposed to the proposed satellite development at West Carterton. Traffic, environment and flooding issues have been poorly addressed. The Shill Brook is the natural western boundary to Carterton.
- Local residents support development opportunities within Carterton and to the north and east of the town. Regeneration and redevelopment of the town is critical.
- A petition was attached to this response with 35 Broadwell signatories.

Carterton Town Council

- Consultants DPDS were commissioned to advise the Town Council (copy of report supplied)
- Reiterate support for an allocation of about 1,000 new dwellings at Carterton. This will help support and sustain local services, facilities and infrastructure and make the town centre the 'first choice destination' for residents of the town.
- Need to plan for the longer term.
- All of the options for strategic growth have merits and disadvantages however the western option is preferred, subject to there being no overriding technical problems.

Clanfield Parish Council

- Objects to expansion of Carterton, essentially a garrison town, into adjoining parishes. There is no need for a large strategic site.
- Proposals are contrary to existing planning policies.
- Carterton cannot compete with Witney and Burford for shopping attractions.
- Major expansion will change the character of the area, bring in-migration and increases in traffic.
- The village is already suffering from increased aircraft noise and traffic as RAF Brize Norton expands.
- The West Carterton option will have the greatest negative impact eg pollution, traffic, flood risk. Who will ensure there will be no further flooding?
- Will WODC listen to public opposition, including from Carterton residents?
- Statement received in September 2011 indicating support for the principle of dispersal and to work with the District Council to identify and assess sites within the parish.

Filkins and Broughton Poggs Parish Council

- Nothing in the new material alters the Council's opposition to development west of Carterton.

- Emerging opportunities/options within Carterton and on the town fringe to the north and east point to even less of a need for a large strategic site to the west.
- Previous consultation misled people into thinking that development to the north of Carterton was not an option.
- Critical of Carterton Town Council's decisions.
- Main concern remains traffic through the village, with sub-standard T-junction. Rejects idea of a roundabout as insufficient highway space. Who would fund improvements?
- Insufficient account taken of impact of RAF Lyneham closure.
- Endorse comments submitted by Alvescot Parish Council.

Kencot Parish Meeting

- Nothing in the new material alters the opposition of Kencot residents to development west of Carterton. No evidence of need for development.
- Further material on drainage and traffic for West Carterton is inadequate.
- Supports limited development to north and east of Carterton.
- Statement received in September 2011 indicating support for the principle of dispersal and to work with the District Council to identify and assess sites within the parish.

Langford Parish Council

- Continues strong objections to development west of Carterton. Detrimental to village life and un-substantiated by need.
- Insufficient account has been taken of RAF plans.
- Detailed comments and questions on further West Carterton published material - drainage, traffic, ecology and environment.
- Should start full consultation process all over again.
- Statement received in September 2011 indicating support for the principle of dispersal and to work with the District Council to identify and assess sites within the parish.

Shilton Parish Council

- No evidence as to why findings of West Oxfordshire Local Plan should be breached. No need for amount of new housing proposed. No benefits for surrounding villages.
- Carterton is a dormitory town and an inappropriate location for strategic growth. Considerable amount of unused land within the town eg failed employment land should be used for housing.
- Detailed comments on/criticisms of David Wilson Homes' scheme/Shilton Road Link.
- Objections to Figbury proposal – unsustainable, develops gap between Shilton and Brize Norton, proximity to quarry, distance from Carterton and its facilities would create separate community, traffic impact upon surrounding rural roads and nearby residents.
- Objections to further published material on West Carterton – does not resolve identified issues of flood risk, light pollution, traffic impact, environmental, visual and ecological harm.

- Traffic protection is needed for Shilton including a bypass for the B4020 Dip.

Witney Town Council

- Severe reservations about all the Carterton options and the increased impact upon Witney with the lack of jobs and facilities at Carterton eg pressure upon 6th form places at Witney.
- The East option is preferred.
- Need for road improvements and cycle links in the Witney-Carterton area eg A40 dualling, Curbridge Road to be upgraded to an A road with a cycle lane.

3. Responses from Local Residents

There were just over 250 responses to the further material published for comment; of these over 200 were from residents of Carterton and nearby parishes. Most of these responses echo comments received in response to consultation at the beginning of 2011, particularly focusing on poor infrastructure and lack of need for and problems associated with large-scale expansion of Carterton. Potential development sites are suggested within Carterton as well as ideas for a more dispersed strategy. Problems with the A40 are raised by many.

Note – During the period for further comment David Wilson Homes circulated material promoting their scheme to local households. Residents have referred to this in their response. The agent has provided a report on responses received.

Alvescot (31 responses) and Black Bourton (7 responses)

Demographic Projections - latest report tries to justify previous errors.

Forecasts rely on in-migration. No justification for 1,000 homes at Carterton.

Affordable Housing Viability - large sites expensive to deliver and unlikely to provide the number of affordable homes sought.

Green Infrastructure Study - strategic site proposals breach key principles, especially to the west.

West Carterton

- detailed criticism of West Waddy reports eg. muddled thinking, unsuitable vehicular access, flawed data, especially traffic, inadequate flood protection/storage ponds & insufficient testing of ground conditions, poor landscape treatment
- general objections cover lack of need, contrary to national policy, least viable and sustainable option, area too big, other opportunities for development emerging/favoured ie within Carterton and to the north & east, many empty properties available, breach of existing local policies, satellite community, inadequate infrastructure, limited employment and increased commuting (especially to east and through Carterton towards A40 and through Alvescot and Black Bourton towards A420), will not improve town centre/people will not walk/insufficient parking, impact of RAF operations, no community benefits, social and environmental impact, loss of biodiversity/impact upon designated sites, flood risk, loss of good farm land, concerns over further expansion beyond present proposal, contrary to localism approach.

A very detailed and lengthy response to all published documents has been received from Mr and Mrs Garbutt who live within the West Carterton option area. Their own executive summary states:

- We believe that the previous consultation demonstrates clearly that opposition to the Carterton West site is strong, including from within Carterton;
- We believe that where statutory consultees have not objected to Carterton West, it is because they have simply taken the developer's claims at face value;
- The Green Infrastructure study provides strong evidence against a strategic site at Carterton West;
- The latest GLA Demographic Report reinforces our conclusion that the 4,300 homes planned for West Oxfordshire caters for significant in-migration and that the real housing need is much less. It is based on worst case assumptions and calculates an upper bound figure with all worst case assumptions, compounding to give maximum possible growth (therefore no requirement for a strategic site at Carterton);
- The latest Affordable Housing Viability Study is based on assumptions eg densities, that do not apply to Carterton West and so does not prove that 50% affordable housing on the site is viable;
- The revised master plan submitted by the Carterton West developer attempts to address some of the many technical issues that we and others raised with their proposals, but still fails to do so;
- The revised Landscape Report illustrates that the site will not be screened for many years and even then, only if plants establish. There will also be a significant maintenance burden;
- The revisions to the Traffic Report and to the Flooding Report include no new evidence and the content remains superficial;
- By comparison with all other options, the Carterton West option scores lowest on all key criteria ie transport, flooding, planning policy, environment, public opinion, risk and cost;
- Many of the responses by West Waddy, representing the Carterton West developer, to concerns raised by the public, present subjective and unsupportable arguments. Nothing in their narrative convinces us that they can overcome the technical challenges on this site;
- The new evidence suggests only four benefits to the West option, all of which are spurious - the size of the site (other options also have areas for future expansion ie East on land to the north of Burford Road and North when the quarry finishes), proximity to town centre (only marginally closer but further from employment), increased spending in town centre (unlikely and few will walk/cycle) and provision of Shill Brook Park (unnecessary as alternatives are available, valley will be blighted and wildlife harmed, delivery in doubt).

Further detailed comments have also been received from Mr and Mrs Garbutt on housing need, the revised West Carterton FRA (Rev C) and their own summary of the consultation responses.

Brize Norton (*47 responses plus petition*)

The petition signed by 243 residents object to expansion of Carterton and particularly development to the east.

East Carterton

- objections refer to yet more loss of rural setting to historic village which was in existence before Carterton (a real village community, not an empty picture postcard place), Brize Norton becoming an urban suburb of Carterton, contrary to current policy/previous promises, disregard for Burford Road residents, increased traffic through village (including Station Road which is to be RAF repatriation route), traffic projections are inaccurate, alternatives of 1000 or 750 homes are too many and do not deal with issues facing this site, flooding issues and inaccurate reports, visual prominence, too close to RAF operations, impact upon new memorial garden, North Witney is a more sustainable location

Kilkenny Farm/Figbury

- some respondents ask for more consultation on this option although many agree that previous WODC reasons for dismissing this option still stand and refer to remote location, creation of a separate settlement (residents would not look to Carterton), development too extensive, visual prominence on rising land, affects character of highly valued country park, loss of farmland which is part of historic setting to Brize Norton, flood risk, sub-standard route to A40 and Monahan Way junction which will be expensive to upgrade, properties along Burford Road already suffer damage from passing lorries, local experience shows a buffer of less than 350m from quarry is unacceptable (quarry noise, dust, hazards for children) and would undermine improvements secured to screen quarry

West Carterton

- support refers to ability to create good quality development with leisure facilities and other town facilities, better balance to town and its centre, close to schools with spare capacity, would not lead to village coalescence, well related to Swindon
- objections refer to lack of need, increased traffic through Brize Norton village, development too large

Broadwell (*11 responses*), **Kencot** (*15 responses*), **Filkins** (*2 responses*) and **Clanfield** (*11 responses*)

- objections relate to the West Carterton option and comment on the poor relationship to Carterton/not a natural extension, the opening up of future major expansion to the west, lack of convincing case put forward by developers as well as lack of need/evidence that Carterton will benefit and insufficient account taken of RAF Brize Norton traffic and aircraft noise; also reference to poor infrastructure and negative impact upon the area (eg inadequate/dangerous roads, traffic increases compounded by distance from facilities, lack of employment, flood risk and inadequate testing of ground conditions including concerns about the height of West Carterton above surrounding villages and repair costs already incurred since 2007 (especially from Clanfield), loss of countryside and impact upon wildlife, insufficient landscape screening), preference for other options eg existing empty brownfield sites, more logical/sustainable land to the north or east of Carterton
- Martin Cobden provides a detailed landscape response to the West Carterton report arguing that there is no natural containment, proposed

- structural landscaping is weak and development will be prominent. He queries who will maintain the new green space, including the Shill Valley.
- some respondents seem to believe that there is a hidden agenda

Carterton (83 responses)

Comments focus on settlement coalescence, environmental loss, traffic impact of further growth, poor infrastructure, lack of jobs, increased flood risk, limited town centre attraction, lack of benefits to area, development potential within Carterton and lack of need for large-scale expansion (although favourable comments received on arrival of Morrisons, Kilkenny country park, play ground and horse sculptures). The Town Council's decision making process is criticised. Most respondents object to the west option; some express a preference for the east option with or without some development to the north (there is some confusion about whether some people are referring to David Wilson Homes or Figbury when expressing support for the northern option). Carterton Football Club wishes to be involved with the chosen option to help secure a better future for the Club.

West Carterton

- objections refer to 'wrong side of town' for commuting, cost of delivery/lack of viability and less money for community benefits, breach of natural boundary/current policy, loss of countryside setting and access, environmental impact, impervious ground conditions, vehicular access onto Upavon Way, increased traffic through town and past Community College (people will not walk into Carterton), no account taken of RAF traffic increases and rat-running taking place
- support refers to best solution to future growth, opportunities to meet needs and deliver good quality development, creates opportunities for leisure and biodiversity in Shill Valley, does not involve coalescence with nearby villages, better balanced town (centre remains centre)
- The Headteacher of Carterton Community College supports further growth and the west option, seeing its close proximity as benefiting the College with the Shill Brook opened up as an outside teaching resource.
- Carterton Football Club sees no benefit to the Club in locating the proposed pitches in the centre of the development

East Carterton

- objections refer to visual and traffic impact upon Brize Norton village, breach of Monahan Way/current policy, area too small to accommodate Carterton's needs (objections to new cemetery & extra football pitches), no biodiversity improvement to compensate for loss of farmland habitat, peaceful area of grazing land should remain
- support refers to option being well related to A40 routes, employment, commuting pattern and local services, less expensive to develop, smaller development area preferred, new school could help alleviate pressure on existing Shilton Park school, buffer area needs to be a proper country/nature park
- Carterton Football Club supports the new football pitches shown on the 750 house development and consider the Club may be able to move there. However proximity to new housing remains a disadvantage. Does not favour pitches off Burford Road as not so practical and would need more land.

David Wilson Homes

- objections refer to undesirable piecemeal development, increased traffic impact on Shilton Park roads, , no biodiversity benefits offered
- support because of smaller development therefore less impact, extension to approved scheme, could be combined with smaller development to east of Carterton
- Carterton Football Club considers this is the ‘nightmare scenario’ which threatens long term sustainability of the Club

Kilkenny Farm/Figbury

- objections refer to distance from town/people will not walk, poor country roads, visual prominence, mineral impact, loss of farmland habitat, loss of valued tranquil character of country park, no obvious limits to expansion
- support because it will not increase traffic through the town/near to A40
- Carterton Football Club supports proposed pitches but problems of vehicular access/traffic and separation beyond bridleway

Shilton (9 responses)

Comments focus on the inappropriateness of the Carterton area to accommodate substantial growth. Reference is made to commuting increases arising from closure of RAF Lyneham. Changes to national policy mean a revised strategy should be produced. Additional publications confirm that expansion of Carterton is unsustainable.

Kilkenny Farm/Figbury

- objections refer to the agent seeking to answer unarguable criticisms of this development, inadequate roads, proximity to quarry (noise can be heard from Shilton), development would fill in gap between Shilton and Brize Norton,

David Wilson Homes

- objections refer to breach of previous agreements on buffers without any justification, alleged collusion between WODC and developers, traffic increases, flood risk, light pollution, Shilton Park built at a much higher density than originally envisaged

West Carterton

- objections refer to impact upon Shilton Conservation Area and views to the south, traffic, flood risk, light pollution, beginnings of much larger scale development

Harry Watts submitted ideas for growth up to and beyond 2026. His plan incorporates land to the north (Figbury with 500 homes & David Wilson Homes with 300 homes plus Town Council land) and land to the east (700 homes). Land to the west is not included. He suggests these ideas should form the basis of a Neighbourhood Plan. A list of possible infrastructure improvements is provided.

Other Responses

- no consideration has been given to the local road structure, including existing river bridges (Thames and Windrush). Need for direct link to A40 from Carterton. Concerned about traffic increases in Minster Lovell (*T Smith*)
- existing roads cannot cope; they were not designed for these traffic levels. Villages already suffer from commuting eg Bladon. Need for major improvements (*T Castle*)

- North Carterton is best as it fits seamlessly into the surrounding area and is near to recently provided facilities (*D Stephens*)
- no need for this amount of new housing at Carterton given MOD development and infilling. Improvements should take place first. West option is worst and David Wilson Homes scheme is best (*F Clough*)
- no further development until roads are improved/railway is re-instated (*T Porter & M Parry*)

B. Summary of Responses on Technical Reports (outside Carterton)

1. Review of Demographic Projections

- Latest GLA projection report addresses previous concerns (*V Goodstadt*)
- Proposed level of housing is unsound. The GLA forecasts are not an assessment of housing need – the Council’s Housing Need Assessment (DCA 2008) shows need to be much higher than the proposed 4,300 dwellings. Figure should be 9,000. Forecasts take insufficient account of in-migration and are substantially below national projections and past build rates. Needs of adjoining local authority areas ignored eg of Oxford – new Duty to Cooperate? Planned declining labour force contrary to national policy (*Barton Willmore on behalf of J.A. Pye and the Blenheim Estate*)
- Does not factor in high in-migration in the short-term due to closure of RAF Lyneham (*Boyer Planning on behalf of Taylor Wimpey*)
- Figures need to be adjusted to cover plan period up to 2028 (*Savills on behalf of Sharba Homes and Cottsway*) (*Boyer Planning on behalf of Taylor Wimpey*)
- Criticisms of original and latest reports. No reason to constrain housing target to 4,300. ONS projections are ‘planning free’ – WODC must identify why these are not appropriate and has not done so. Refers to recent Government announcements, including draft National Planning Policy Framework (*RPS on behalf of Banner Homes*)
- Housing target should not be less than the annual pro-rata SE Plan figure which still applies. Additional provision is required in the event of non-take up of permissions and allocated land (*Porta Planning on behalf of Eton College*)

2. Affordable Housing Viability Review

- Considers Viability Model not appropriate for small sites (*Empire Homes*)
- Too high a percentage of affordable housing is sought on small sites (*Empire Homes*)
- 50% is too high in places like Woodstock, Eynsham and Long Hanborough (*Barton Willmore on behalf of J.A. Pye and the Blenheim Estate*)
- Supports 40% affordable housing in Chipping Norton and Eynsham (not 50%). Considers some of the Study’s assumptions are flawed and that viability has decreased not increased (*Savills on behalf of Sharba Homes and Cottsway*)
- Need to maintain a flexible approach (*Porta Planning on behalf of Eton College*)

3. Green Infrastructure (GI) Study

- Welcomes Green Infrastructure interim report and suggests additional material to take this work forward (*Natural England*)
- Supports document (*Environment Agency*)

- Detailed comments on and additional information to assist the Study (*Sport England*)
- Welcomes Green Infrastructure interim report and suggests some amendments/additions to improve document (*V Goodstadt*)
- Green Belts should be protected. About a dozen EcoHamlets would deliver the GI objectives (*Transition Eynsham*)
- The Blenheim Palace World Heritage Site is a critical part of the GI and requires a positive planning framework (*Barton Willmore on behalf of J.A. Pye and the Blenheim Estate*)
- Acknowledged that this is at preliminary stage however it is not clear how the study will fit within the development context. Greater clarity required (*Boyer Planning on behalf of Taylor Wimpey*)
- Recommendations supported. Proposals at West End Farm, Chipping Norton will add to GI (*Savills on behalf of Sharba Homes and Cottsway*)
- Object to College's land at Cogges, Witney being included within Conservation Target Area (*Porta Planning on behalf of Eton College*)

4. Housing Land Supply

- Land supply is marginal and does not meet Government proposals in the draft National Planning Policy Statement (NPPF). Not all identified land is available and deliverable (*Barton Willmore on behalf of J.A. Pye and the Blenheim Estate*) (*Savills on behalf of Sharba Homes and Cottsway*)
- If Core Strategy cannot demonstrate housing land supply in accordance with proposed NPPF then it will be found unsound upon Examination (*Boyer Planning on behalf of Taylor Wimpey*)
- Discount for expired planning permissions could prove to be too low – additional allocations required (*Porta Planning on behalf of Eton College*)
- Detailed comments on Kingham data (*V Endley*)

5. Other Comments (not directly related to latest published reports)

- Chipping Norton strategy - suggestions to improve town centre/resist out of centre shopping. Need for more affordable housing (*K. Bloom*)
- In view of the objections to development in the Carterton area, the North Witney proposal and West End Link crossing should be re-considered (*R Helyar*)
- Growth is too focused on Carterton (town significantly constrained) whereas need and demand is not focused on the town to the extent proposed. Insufficient provision at the Rural Service Centres of Woodstock and Long Hanborough. Need to make provision to help fund the management of the World Heritage Site (*Terence O'Rourke on behalf of Blenheim Palace Estate*)
- Housing levels need to be increased (with a separate target) to meet needs outside the 3 main towns. Promoting two sites each at Woodstock and Long Hanborough – considered deliverable during next 5 years. Draft concept plan and supporting statement submitted for Woodstock East. Similar but separate submission from J.A. Pye promotes land at Fruitlands, Eynsham with illustrative layout and supporting statement (*Barton Willmore on behalf of J.A. Pye and the Blenheim Estate*)
- Land at Fruitlands, Eynsham should be dedicated as public open space (and not built on for housing) (*L Kennedy*)

- Need for more social housing in the Wychwoods but this should be done in a planned way. However no suitable locations currently available in Shipton (*Shipton-u-Wychwood Parish Council*)