



The Planning Inspectorate

Report to West Oxfordshire District Council

by Malcolm Rivett BA (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Date: 24 August 2018

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the West Oxfordshire Local Plan 2031

The Plan was submitted for examination on 14 July 2015

The examination hearings were held between 23 and 26 November 2015, 9 and 18 May 2017 and 11 and 20 July 2017.

File Ref: PINS/D3125/429/5

Abbreviations used in this report

AA	Appropriate Assessment
AAP	Area Action Plan
AONB	Area of Outstanding Natural Beauty
CPO	Compulsory Purchase Order
DCLG	Department for Communities and Local Government (now Ministry of Housing, Communities and Local Government)
Doc	Document
DtC	Duty to Co-operate
FMM	Further Main Modification
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LTP4	Local Transport Plan 4
MoD	Ministry of Defence
MM	Main Modification
NPPF	National Planning Policy Framework (March 2012)
OAN	Objectively-Assessed Need
PPG	Planning Practice Guidance
RAF	Royal Air Force
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SDA	Strategic Development Area
SHELAA	Strategic Housing and Employment Land Availability Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
WHS	World Heritage Site

Non-Technical Summary

This report concludes that the West Oxfordshire Local Plan 2031 provides an appropriate basis for the planning of the District, provided that a number of Main Modifications [MMs] are made to it. West Oxfordshire District Council has specifically requested the appointed Inspector to recommend any MMs necessary to enable the plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal and Habitats Regulations Assessment of them. The MMs were subject to public consultation in line with the Statement of Community Involvement. I have recommended their inclusion in the plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Increasing the 2011 - 2031 housing requirement to 15,950 new dwellings, **including 2,750 in respect of Oxford City's needs and setting out a "stepped" approach to meeting this need during the plan period;**
- Increasing the planned-for number of dwellings at North Witney, East Witney and East of Chipping Norton Strategic Development Areas (SDAs), allocating a new SDA at West Eynsham and identifying North Eynsham as a strategic location for growth to be planned in detail through an Area Action Plan;
- Allocating 11 other new sites for housing development;
- Altering employment land requirements to reflect the most up to date evidence;
- A range of other alterations to the plan to ensure that it is positively-prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the West Oxfordshire Local Plan 2031 in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the plan's **preparation** has complied with the Duty to Co-operate. It then considers whether the plan is compliant with the other legal requirements and whether it is sound. Paragraph 182 of the *National Planning Policy Framework* (NPPF) of March 2012 makes it clear that in order to be sound, a Local Plan should be positively-prepared, justified, effective and consistent with national policy.
2. In July 2018 a revised *National Planning Policy Framework* was published. However, paragraph 214 of this document makes clear that the previous Framework (ie that of March 2012) will apply for the purpose of examining plans submitted on/before 24 January 2019 (ie West Oxfordshire Local Plan 2031). Consequently, references in this report to national policy/the NPPF are to the document of March 2012.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The West Oxfordshire Local Plan 2031, submitted July 2015, is the basis for my examination. It is the same document as was published for consultation in March 2015.
4. Simon Emerson BSc DipTP MRTPI was initially appointed to undertake the examination and Stage 1 hearing sessions were held in November 2015. Mr Emerson published Preliminary Findings in December 2015 (Appendix 1) and in the light of these, in January 2016, agreed to a request to suspend the examination in order for the Council to undertake further work and to propose main modifications to the plan to address his concerns. During this period of suspension Mr Emerson retired as an Inspector and I was appointed to continue the examination.
5. In November 2016 the Council published for consultation a number of proposed modifications to the plan. These were submitted to the Planning Inspectorate on 10 March 2017 at which point the examination resumed and Stage 2 and Stage 3 hearing sessions were held in May 2017 and July 2017 respectively.

Main Modifications

6. In accordance with section 20(7C) of the 2004 Act the Council has requested that the appointed Inspector recommend any main modifications [MMs] necessary to rectify matters that make the plan, as originally submitted for examination in July 2015, unsound or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in Appendix 2.
7. During the suspension of the examination the Council prepared a schedule of main modifications (MMs) which was the subject of Sustainability Appraisal (SA) and **public consultation in accordance with the Council's Statement** of Community Involvement in November/December 2016. Following the

subsequent Stage 2 and Stage 3 hearings it prepared, subjected to SA/HRA and consulted on (February – April 2018) a schedule of further main modifications (FMMs), some of which alter in whole or in part the previously-proposed MMs. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

8. The existence of two separate schedules of modifications (MMs and FMMs) has the potential to cause significant confusion, particularly given that some of the FMMs wholly or partly modify the MMs. With this in mind a single consolidated list of main modifications to the plan, as originally submitted in July 2015, has been prepared (Appendix 2). This has resulted in the renumbering of the modifications as originally consulted on but, other than in respect of the detailed wording amendments I have made in the light of consultation comments, their content and effect is unchanged.
9. In adopting the plan the Council can also make additional modifications to the plan so long as they do not, alone or in combination, materially alter the policies of the plan. Such changes are likely to include alterations to the supporting text consequential to the main modifications, minor factual updating and the correction of typographical errors etc. Adopting a very cautious approach, the Council consulted on a number of minor factual updates and consequential alterations to the supporting text as main modifications. However, I am satisfied that these alterations to the plan do not in fact constitute MMs and, therefore, I have not recommended them as such. As part of the consultation on the MMs a number of suggestions have been made to further update the supporting text and to address minor inconsistencies. Insofar as it considers it to be necessary the Council can address these through other additional modifications.

Policies Map

10. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprised the following set of plans: Overarching Policies Map (CD11); Inset Maps 9.6, 9.10, 9.14, 9.15, 9.16 and 9.18; and Other Plans and Figures 4.1, 5.1, 8.2, 8.3, 8.4, 8.6, 9.3, 9.4, 9.5, 9.8, 9.9, 9.12 and 9.13.
11. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the recommended MMs to the **plan's policies require** further corresponding changes to be made to the policies map. These further changes were published for consultation alongside the MMs in 2016 and in 2018 (*Schedule of Policy Map Changes*, February 2018).

12. When the plan is adopted, in order to comply with the legislation and give effect to the **plan's policies, the Council will need to update the adopted policies map** to include all the changes proposed in the set of plans listed above and the further changes published alongside the MMs which result in the policies map consisting of the following set of plans: Overarching Policies Map (CD11); Inset Maps 9.6, 9.10, 9.14, 9.15bi, 9.16 and 9.18; and Other Plans and Figures 4.1, 5.1, 5.3, 8.2, 8.3, 8.4, 8.6, 9.3, 9.4, 9.4a, 9.4b, 9.5, 9.8, 9.8a, 9.8b, 9.9, 9.12, 9.13, 9.15a, 9.15b, 9.15c, 9.15d, 9.15e, 9.15f, 9.15g, 9.15h and 9.16a.

Scope of the Report

13. This report details my assessment of the Duty to Co-operate, other aspects of legal compliance and, through consideration of 12 main issues, the soundness of the plan. The report takes account of all the representations, the written evidence, the discussions which took place at the examination hearings and what I saw on numerous site visits across the district. However, it deals only, and proportionately, with the main matters of legal compliance and soundness and does not seek to respond to every point raised by the Council or representors.

Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that the appointed Inspector considers whether the Council complied with any duty imposed on it by section 33A in respect of the **plan's** preparation.
15. The Duty to Co-operate applies during the period of plan preparation – ie up to the point at which the Council submitted the plan for examination in July 2015. Compliance with the duty was considered at Stage 1 hearings in November 2015 and Mr Emerson, as the appointed Inspector at that time, concluded in paragraphs 8.1 – 8.3 of his published Preliminary Findings Part 1 (Appendix 1) that the Council had fulfilled the Duty. Based on all that I have read and heard I have no reason to disagree with this conclusion and, overall, I am satisfied that, where necessary, the Council engaged constructively, actively and on an on-going basis in the preparation of the plan and that the Duty to Co-operate has therefore been met.

Assessment of Legal Compliance

Nature and extent of modifications to the plan

16. On a number of counts it has been argued that the plan, as proposed to be modified, is not legally compliant bearing in mind the extent of change to it since it was originally submitted for examination. The modifications I am recommending in order to make the plan sound would significantly alter it, particularly in terms of the housing requirement figure and the inclusion of more and larger sites for housing and employment development. However, many parts of the plan would remain substantially unaltered. There is nothing in law which limits the extent of change which an Inspector can recommend to a plan through main modifications. The *Planning Practice Guidance* indicates that where the changes recommended would be so extensive as to require a virtual re-writing of the document, the Inspector is likely to suggest that the local planning authority withdraws the plan. However, in this case, whilst the

changes would be significant, I conclude that they would not constitute the "virtual re-writing" of the plan.

17. It is the case that the plan as modified would not accord with the **Local Development Scheme** (LDS) in place at the time the plan was submitted for examination, in terms of the approach to be taken to addressing Oxford City's unmet housing needs. However, the plan as submitted was in accordance with the adopted LDS at that time. Since then a revised LDS has been adopted by the Council and the plan, as proposed to be modified, accords with the revised LDS. Consequently, there is no legal compliance failure in this respect.
18. **It is argued that the Council's adopted Statement of Community Involvement** (SCI) does not envisage the amount of change to the plan proposed by the main modifications I am recommending. Whether or not this is so, the modifications have been consulted on in line with the SCI. An exception to this is that some of the supporting evidence for the main modifications was not made available until well into the consultation exercise which commenced in November 2016. However, I am satisfied that significant prejudice was not caused by this. Consultees were fully aware of the proposed modifications to the plan and had the opportunity to raise concerns about the late emerging supporting evidence if they so wished through hearing statements and at the Stage 2 and 3 hearing sessions.
19. It has also been argued that, in view of the extent of change proposed to the plan, **an 'Issues and Options' style consultation should have been undertaken** before main modifications were proposed and consulted upon. However, the Act and Regulations do not require, or provide for, such a consultation post-submission of a plan for examination. In any case, through the Regulation 19 consultation undertaken on the originally submitted plan, the discussions at the Stage 1 **examination hearings and Mr Emerson's Preliminary Findings**, the range of issues and options of relevance to securing a sound plan for West Oxfordshire were clearly aired.

Sustainability Appraisal

20. The following documents summarise the Sustainability Appraisal (SA) work undertaken in connection with the preparation of the plan and the formulation of the modifications proposed to it:
 - Doc CD2 (**Final SA Report**, February 2015) which appraises the plan as submitted for examination in July 2015 and was the culmination of work ongoing since 2010.
 - Doc CD10 (**SA Addendum Report**, October 2016), which appraises the main modifications proposed by the Council following suspension of the examination.
 - Doc CD12 (**SA Further Addendum Report**, October 2017), which considers a number of additional reasonable alternatives, refreshes appraisals of number of proposed allocations and includes a comparative assessment of options for strategic development area sites in the main towns.

- Doc CD17 (*SA Further Addendum Report*, February 2018), which appraises the further main modifications proposed following the Stage 2 and Stage 3 hearing sessions.
21. Throughout all four documents a consistent framework of 16 objectives has been used to assess the emerging plan. These were developed following a scoping and consultation exercise and are relevant and appropriate to the scope of the plan, local context and national policy. Assessment of the plan against the objectives was undertaken by independent and experienced assessors, with input from Council officers particularly in relation to factual information. I am satisfied that this overall approach is adequate.
 22. Doc CD2, supporting the plan as originally submitted for examination, **appraised the plan's 'three towns focus' spatial strategy against identified** reasonable alternatives of (i) a focus on Witney and (ii) more dispersed development. During the suspension of the examination the spatial strategy options were re-assessed (Doc CD10), in the light of an increased housing requirement figure, along with assessment of two further options: (iii) concentration along transport corridors and (iv) a new village. To my mind the assessment of reasonable alternatives at this strategic, spatial strategy, level is robust. For the reasons detailed in CD10, the plan, as proposed to be **modified, is based on a continuation of the 'three towns focus' spatial strategy** together with a new village, the latter in connection with Oxford City's unmet housing needs. In contrast to the assertion of some, the concept of a new **village was not a "given" but** was proposed by the Council in the light of SA assessment of four distinct spatial alternatives designed to deliver the increased housing requirement.
 23. Doc CD10 also **reconsidered earlier assessments and conclusions on 'directions of growth' at Witney, Carterton and Chipping Norton. For each town a number** of growth options were appraised, in effect reasonable alternatives to the strategic development area allocations included in the plan as proposed to be modified. Doc CD10 also appraised directions of growth at Eynsham (sites to the north and west, both proposed for allocation in the modified plan) and 15 non-strategic housing allocation sites (all proposed for allocation in the modified plan). The development sites selected for appraisal reflect the conclusions of the *Strategic Housing Land Availability Assessment (SHLAA)* (2014) and the *Strategic Housing and Employment Land Availability Assessment (SHELAA)* (2016) considered in detail in Issue 4 below.
 24. It has been argued that doc CD10 is inadequate, primarily in (i) not assessing reasonable alternatives to the Eynsham sites and the 15 non-strategic housing allocation sites; and (ii) not undertaking a comparative assessment of the sustainability of all strategic sites at the three main centres. Whilst contending that, in respect of most of these criticisms, the SA was not inadequate, the Council, nonetheless, commissioned further SA work in response to the main points raised.
 25. To this end Doc CD12 appraises (as reasonable alternatives to the allocations/location for growth proposed in the plan as proposed to be modified) Barnard Gate Garden Village, land to the north of the A40 at Barnard Gate, land adjacent to Hanborough Station (in two combinations), and 13 non-strategic sites identified in the SHELAA (2016) as potentially suitable

for development. Sections 4, 5 and 7 of Doc CD12 explain the conclusions that the strategic and non-strategic sites included in the plan (as proposed to be modified) are appropriate in the light of the assessment of these reasonable alternatives.

26. At Appendix B, Doc CD12 also sets out a comparative assessment of all the strategic development site options appraised in the three main towns. However, **the plan's spatial** strategy (which itself was the subject of comparison with reasonable alternatives as detailed above) provides for growth to take place at all three of these towns. In this context I concur with the Council that it would be inappropriate to use the Appendix B assessment to allocate or not allocate in the plan a strategic site in one of these **settlements on the basis of its 'performance' against a site in another town.**
27. In practice there is an almost limitless number of combinations of comparative assessments which could be undertaken across the full breadth of options for **the plan's overall spatial strategy, for broad directions of growth at** the main settlements and for strategic and non-strategic site allocations. However, that this appraisal work could, in theory, be undertaken does not mean that it is necessary for the SA to be legally compliant. Ultimately, I conclude that, in respect of the overall spatial strategy, strategic development areas and non-strategic allocations, the SA proportionately and adequately assesses reasonable alternatives to the policies and allocations included in the plan.
28. The SA does not seek to aggregate the individual assessments of effects against each objective through a formal scoring or weighting system and there is no legal compliance failure in this respect. To my mind such a system is not necessarily a more objective approach to SA and has the potential to oversimplify or obscure complex planning judgements, in which the weight given to various criteria may appropriately vary from issue to issue or from one location to another. SA is intended to inform plan preparation but it is not **a "sausage machine" into which data on sites can be entered, settings** can be selected and from which a chain of sites to be allocated in the plan will be produced. It is reasonable (and thus legally compliant) for the Council to conclude that a site which is likely to have many positive impacts, but one significant adverse effect, should not be allocated in the plan, whilst one that has a number of adverse effects but one significant beneficial effect should be allocated. Furthermore, it is not unusual that some reasonable alternatives are appraised to have very similar effects as the chosen site allocations. Nonetheless, as required by law, the reasons for selecting the chosen sites are clearly, if briefly, explained (paras 3.9 – 3.13, 4.14 – 4.15 and 5.13 of the October 2017 Further Addendum Report (doc CD12)) and these explanations are, in my view, reasonable ones.
29. The assessment has been undertaken at a relatively strategic level. Such an approach is commonplace and, in principle, I am satisfied that it is appropriate and proportionate to inform preparation and examination of a local plan. **Crucially, the assessment of the plan's policies and allocations has been** undertaken at the same level of detail as that of the reasonable alternatives. Nonetheless, it has been argued that the specific assessment of effects of a **number of the plan's policies**, allocations and reasonable alternatives ignore relevant factors, are incorrect, unjustified or inconsistent and/or are not supported by sufficiently detailed information.

30. That many people disagree with the assessment of specific effects is unsurprising and almost inevitable given that, although supported by relevant technical evidence, many of the assessment conclusions involve a significant element of planning judgement. More widely, as detailed below, having considered a number of specific examples (which raise themes common to many of the individual criticisms of the SA), I am satisfied that the conclusions reached are reasonable ones and that any omissions, errors or inconsistencies which do exist do not result in the SA being fundamentally or substantially flawed.
31. In relation to air quality impacts of strategic sites at Witney and Chipping Norton, I concur with the Council that the technical evidence, in this particular regard, is not "black and white" and there is, thus, a role for planning judgements in assessing likely effects. Moreover, in the context of the overall volume of assessment work undertaken in the SA of the plan, any inconsistencies or even errors in these matters (assuming they were to be definitely shown to amount to such) do not fundamentally undermine the process.
32. The SA identifies the West Carterton site as being 0.8km from the town centre and the West Eynsham site as being 1km from the village centre but nonetheless, seemingly counter-intuitively, concludes that the latter is well-located in relation to services whilst the former is not. However, it is the case that the West Carterton site is around 0.8km from the town centre at its nearest point and the middle of the site is around 1.5km distant. In contrast, the 1km measurement is to the middle of the West Eynsham site and at its closest point the site is around 0.6km from the village centre. Whilst the inconsistency in measurements adopted in the SA is unfortunate, such an occurrence is unsurprising given the overall volume of appraisal evidence and the number of individuals likely to have been involved in its preparation/collation. Crucially, having regard to consistent measurements, the **SA's** conclusions on these sites are justifiable ones.
33. A different point has been argued in relation to distances from the South Witney and North Witney site options to Witney town centre. Whilst it could be appropriate to measure the distance from the South Witney site from a location which is nearer the town centre than the 2.3km stated in the SA, the same approach would need to be applied to the North Witney site, reducing the comparable distance below the 1.5km indicated for this site in the SA. **Furthermore, the SA's assumption as to what constitutes the central point of the town centre is, to my mind, entirely reasonable, it being a key junction, pretty much at the central point of the plan's defined town centre boundary.**
34. In relation to the appraisals of site options near Hanborough Station it is reasonable for the SA to conclude that, notwithstanding the presence of the station, development at Hanborough would have a minor adverse effect on traffic, whereas the West Eynsham site would have a positive effect because of wider benefits of the relief road proposed as part of the latter development. Moreover, given the proximity of designated ecological sites to the Hanborough Station site options, **the SA's minor negative (with some uncertainty) biodiversity assessment is reasonable, in comparison with the neutral (with some uncertainty) assessment for site options not in close proximity to protected sites.** On this basis the SA assessment is not

undermined by (or even strictly inconsistent with) subsequent evidence, commissioned by the promoter of the Hanborough Station site which contends that biodiversity harm would be unlikely. It is a legal requirement that SA of effects between reasonable options is undertaken at the same level of detail and it is not a requirement, nor would it be proportionate in connection with a local plan, for that level of detail to be akin to that required in connection with an application for planning permission.

35. In terms of the Kilkenny Farm site it is argued that in assessing the effect on health, well-being and reducing inequalities as "minor positive with some uncertainty" insufficient weight has been given to new sports, country park, walking and cycling facilities and landscaping enhancements. Whilst it is not completely unfeasible that this effect could have been judged to be a major positive one, (assuming the site could be shown to specifically resolve an existing sustainability problem) this is substantially a planning judgement and **to my mind the SA's assessment is entirely reasonable. Moreover**, in my view, **the "uncertainty" element of the assessment** (which is common to **the SA's** assessment of most of the strategic development area site options for this particular objective) reasonably reflects uncertainties about the actual effects of facilities such as sports and country park provision on health, well-being and reducing inequalities.
36. In respect of the appraisal of the Oxfordshire Cotswolds Garden Village and the reasonable alternatives to it, it has been argued that many of the conclusions reached, including in relation to Park and Ride provision, the envisaged new footbridge, the existing concrete recycling facility and heritage assets impacts, are inappropriate or unreasonable in the light of the available evidence. However, I am satisfied that the nature, coverage and level of detail of the evidence is proportionate to an SA intended to inform local plan preparation and that the conclusions and planning judgements reached in the light of it are within the bounds of reasonableness.
37. It is the case that the SA work has been, to some degree, complicated by the overall length of the examination and the suspension of it in 2016. Furthermore, significant additional appraisal work has been submitted at a relatively late stage in the examination as a result of the **Council's willingness** to commission work to respond to criticisms of the SA, even where it believed this not to be strictly necessary for legal compliance. However, although now set out across four main documents, the overall approach taken to SA is consistent and the reasons for the additional work and the conclusions of it clearly explained at each stage. Whether or not all the additional work prepared in response to criticisms was strictly necessary for the SA to be legally compliant, it and the overall level of scrutiny the SA work has received, strengthens its value in informing the policies and allocations of the plan. Furthermore, whilst it is not a legal requirement, that the SA work has been led by experienced, professional consultants, independent of the Council supports its objectivity.
38. Overall, I conclude that the Sustainability Appraisal work undertaken in connection with the plan is adequate.

Other Aspects of Legal Compliance

39. I conclude that the plan meets all other legal requirements:

- the plan as proposed to be modified is in accordance with the **Council's Local Development Scheme** (March 2017), other than in respect of the timetable for the examination and adoption which does not represent an inherent legal compliance failure;
- the **Statement of Community Involvement** was adopted in December 2014. I recognise that consultation on the plan, which has taken place over a number of stages, has been for some people somewhat confusing. However, the Council has made efforts to explain the situation at each stage. Overall, consultation on the plan and the MMs has complied with the requirements of the **Statement of Community Involvement**;
- building on earlier 'rounds' of Habitats Regulations Assessment work, the **Habitats Regulations Assessment incorporating Appropriate Assessment** report (June 2018) concludes that the plan, as proposed to be modified, will not have an adverse effect on the integrity of any European designated site. Consultation on the report accorded with Reg 105 of the Conservation of Habitats and Species Regulations 2017 and Natural England has confirmed that it is satisfied with the report;
- the plan complies with national policy except where indicated and MMs are recommended;
- the plan includes policies (in particular policies T1, T3, EH4 and EH5 in respect of public transport, cycling, walking, low carbon energy development and flood risk) designed to ensure that the development and use of land in the plan area contributes to the mitigation of, and adaptation to, climate change; and
- the plan complies with all other requirements of the 2004 Act and the 2012 Regulations.

Assessment of Soundness

Issue 1 – whether or not the plan's strategy for new homes is positively-prepared, justified, effective and consistent with national policy

Objectively-Assessed Need for New Housing

40. The Council, together with its partner Oxfordshire authorities, commissioned the April 2014 **Oxfordshire Strategic Housing Market Assessment** (SHMA). Taking account of migration, commuting flows and house prices the assessment identifies that the majority of Oxfordshire forms a sub-regional housing market area. Consequently, and bearing in mind that there is no convincing evidence to the contrary, the county is an appropriate basis on which to assess housing need. Alongside Oxfordshire-wide figures, the SHMA identifies an analysis of housing need for each constituent district.

41. The SHMA was prepared in line with the *Planning Practice Guidance* (PPG) and uses as its starting point the, then, most up to date, 2011-based DCLG household projections. These have been appropriately adjusted having regard to more recent migration data, calibrated to census data. Consistent with the advice in the PPG the SHMA then assessed the number of new households which would be required to provide the labour force necessary to meet the likely economic growth in West Oxfordshire over the plan period and, finally, slightly uplifted this figure to 685 dwellings per annum (dpa), the number of new dwellings necessary to meet the identified affordable housing need, assuming 40% of new homes are affordable. Table 90 of the SHMA summarises the work undertaken and concludes that the plan period (2011-2031) objectively-assessed housing need (OAN) for West Oxfordshire is in the range 635-685 dpa, The range appropriately reflects the inherent uncertainties in the formulation of the figure.
42. Nonetheless, as originally submitted for examination, the plan contended that the objectively-assessed need for new housing in the district is 525dpa. There **was much discussion of this figure at the Stage 1 hearings and Mr Emerson's** conclusions on the point are set out in sections 2 – 6 and 10 of his Preliminary Findings Part 1 (Appendix 1). Based on all that I have read and heard I concur with his conclusion that the contended OAN of 525 dpa (10,500 dwellings for the plan period) is not justified by the submitted evidence.
43. During the suspension of the examination the Council commissioned two partial updates of the SHMA. Using a similar, but not identical, approach to assessing housing need as the 2014 document, the second *Partial Update* (which is based on the, by then, most up to date 2014-based demographic projections) concludes that the OAN for West Oxfordshire is 592dpa, but makes clear that this figure would need to be uplifted in order to ensure that all identified affordable housing needs are met. That the 592dpa figure is lower than the range indicated in the 2014 SHMA is primarily explained by forecasts of a higher number of working age households in the district and a consequent reduction in the likelihood of in-migration of people to take up employment. This assumption is supported by some but is roundly criticised by a number of others and I find the evidence on this particular point to be largely inconclusive.
44. In the context of this conflicting evidence the Council has now concluded that the appropriate OAN for the district is 660 dpa – the mid-point of the range indicated in the 2014 SHMA. Bearing in mind that forecasting housing requirements is not an exact science, I consider that this is a soundly-based conclusion for three main reasons. Firstly, even if the more recent forecast of a higher numbers of working age households is correct, providing for only 592 dpa would potentially result in a substantial shortfall in the provision of affordable homes to meet the identified need of 274 such dwellings per year. Secondly, OANs in accordance with the 2014 SHMA have been found sound through the examinations of the Cherwell and Vale of White Horse Local Plans, the latter by me. Given that all the Oxfordshire districts comprise a single housing market area, there would be much sense in planning for housing on the same basis. This is because potentially under-supplying housing in one district would have knock-on effects for the others and for the housing market area as whole. Thirdly, the SHMA identifies the OAN for the district as lying within a range, specifically to reflect inevitable uncertainties in its formulation.

Given that there is no convincing evidence to resolve these uncertainties, it is entirely logical to take the mid-point of the range as the OAN on which the plan is based.

45. In concluding that the 660 dpa OAN figure is sound I have had regard to the various criticisms of the 2014 SHMA. Although the forecasts of economic growth on which the SHMA is based are ambitious, I consider that they are not unrealistically so and the *Planning Practice Guidance* makes clear that employment forecasts are a key consideration in determining future housing needs. Moreover, it is notable that the uplift to reflect economic growth of around 22% in West Oxfordshire is significantly less than the economic growth uplifts already found sound through examination of the Cherwell and Vale of White Horse Local Plans. Mr Emerson set out his views on many of the other criticisms of the 2014 SHMA in his Preliminary Findings Part 1 (Appendix 1), many of which are essentially challenges to national policy, and I have subsequently read and heard nothing which leads me to disagree with his conclusions to any material degree.
46. The revised *National Planning Policy Framework* of July 2018 indicates that the assessment of local housing need should, in most circumstances, be undertaken using a standard method set out in national planning guidance. I understand that, using this method which does not take account of forecast economic growth, the housing need figure for West Oxfordshire would be significantly lower than the 660dpa indicated by the SHMA and set out in the plan as proposed to be modified by the Council. However, as detailed in the Introduction to this report, the March 2012 version of the NPPF, not the revised version, applies to the examination of this plan. In any case, the new element of the PPG which details the standard method, makes clear that the calculation is a minimum local housing need figure. Consequently, notwithstanding the standard method, I conclude that the 660 dpa figure is a soundly-based assessment of West Oxfordshire's housing requirement for the plan period.

Oxford City's Unmet Housing Needs

47. It has been known for some time that Oxford City is unlikely to be able to provide within its own boundaries for its full objectively-assessed need for new housing, based on the 2014 SHMA. Through its membership of the Oxfordshire Growth Board, West Oxfordshire Council recognised that it might be appropriate for some of this unmet housing need to be provided for in its area, although the plan as submitted made no provision for this. As indicated in its Local Development Scheme at the time of submission of the plan, the Council envisaged a plan review as the appropriate mechanism for dealing with this matter – an approach found sound in respect of both the Cherwell and Vale of White Horse Local Plans.
48. During the suspension of the examination the Oxfordshire Growth Board formally agreed that a 'working assumption' figure of 15,000 represents **Oxford City's unmet housing need** and that West Oxfordshire will accommodate 2,750 of these homes in the period 2021-2031. The 2,750 figure is based on extensive joint work on both capacity within Oxford City and on **potential options for meeting the city's housing needs beyond the city boundary**. The latter work includes a Green Belt study, a Spatial Options

Assessment, a Transport Infrastructure Assessment and an Education Assessment.

49. I consider the merits of the specific site/location for growth proposed in the plan to provide for this need in Issue 8 below, but based on the Growth **Board's work** I conclude that the 2,750 requirement figure is, in principle, soundly-based. I note the criticism of the paucity of public consultation and **involvement in the Growth Board's work. However**, the extent of consultation was fundamentally a judgement for the Board, I am not aware that there is **any legal compliance failure in this respect and the outcome of the Board's work** will be (and has been in the case of West Oxfordshire) the subject of full public consultation through each relevant local plan examination.
50. The 2,750 **figure is, of course, only a 'working assumption'** and could change over time dependent on the outcome of the examinations of other districts' plans and plan reviews and/or new evidence which may come forward in the future. Distributing housing needs amongst a number of authorities each with their own local plan timetable will, inevitably, be an iterative process. However, as the first authority in a position to make provision for the agreed distribution of **Oxford City's unmet needs**, it is entirely appropriate for the West Oxfordshire plan to do so. Should the evidence point to the need to significantly alter the 2,750 figure in due course, a review of the plan would be the most appropriate way to achieve this. However, bearing in mind the statutory requirement for plans to be reviewed at least every five years, there is not a need for the plan to include a specific policy in this respect.
51. It has been argued that the Oxford City unmet housing needs requirement should apply immediately rather than being provided for only in the last ten years of the plan period (ie 2021-2031). However, this timescale is supported by all the local authorities and it reflects the realities of delivery in the light of the strategy and lead-in times for the specific sites deemed most appropriate to meet these needs. Moreover, nothing in the plan prevents delivery of **housing to contribute towards the city's unmet housing needs before 2021**. Indeed, notwithstanding the theoretical need that they are provided to meet, in reality, all homes built in the Eynsham – Woodstock sub-area (the part of West Oxfordshire closest to Oxford) will be as much available for households who would be considered to be an Oxford City housing need as to households who would be considered to be a West Oxfordshire need.

The Housing requirement figure and policies H1 and H2

52. In the light of my conclusions above, the plan as submitted is consequently not sound in assuming an OAN of 525 dpa and in not making provision for **West Oxfordshire's**, now agreed, share of the likely unmet housing needs of Oxford City. Moreover, my conclusions elsewhere in this report, on the sites and policies the Council now proposes to provide for the higher housing need figure, indicate that there are not constraints in the district which would justify not seeking to fully meet the objectively-assessed need for housing. Consequently, **MM7, MM8, MM9 and MM10** are necessary for the plan to be positively-prepared and justified. These make clear in policies H1 and H2 that the plan will provide for at least 15,950 new dwellings in the 2011-2031 **period, comprising 13,200 dwellings for the district's own needs** (reflecting the

OAN of 660 dpa) and 2,750 dwellings (for the period 2021-2031) in respect of unmet needs from Oxford City.

53. The "at least" wording of the policy as proposed to be modified reflects the presumption of national policy that identified housing needs will be met. It also allows for the fact that some additional housing development may come forward which, whilst not specifically provided for in the plan, is entirely acceptable (eg windfall development within the urban areas).
54. Policies H1 and H2 also address the distribution of housing development across the district and over the plan period which are considered in Issues 3 and 10 respectively.

Policy H3 - Affordable Housing

55. In accordance with NPPF paragraph 50, policy H3 sets out requirements for the provision of affordable housing as part of residential developments. Although the requirements have been challenged on a number of counts, the rates set in the policy reflect the need for 274 affordable homes, identified in the 2014 SHMA, and the findings of the February 2015 *Local Plan and CIL Viability Study*. Other than in relation to sheltered and extra-care housing, discussed below, there is no detailed and convincing evidence to the contrary. It is of course the case that a specific scheme may not viably be able to provide for the standard affordable housing requirement and the policy appropriately provides for reduced provision in such cases. However, it would not be in accordance with the aim of national policy that affordable housing needs are met, to set the standard affordable housing requirement at a rate at which every single development could viably achieve.
56. Whilst the policy's affordable housing requirements are shown to be viable for most schemes, it is, of course, the case that reducing them would improve the economics of market housing development, potentially further increasing the likelihood of it taking place. This is one aim of the minimum thresholds for requiring affordable housing set out in national policy with which Policy H3 accords. Nothing in national policy requires authorities to go further in this respect and, I conclude that, in general terms, the plan's affordable housing requirements appropriately balance the identified need for both market and affordable housing in the district, bearing in mind that the total housing requirement figure includes an uplift specifically intended to ensure that affordable housing needs are met.
57. The amount of affordable housing required by the policy varies by area, there being high (50% affordable housing), medium (40%) and low (35%) value zones. As permitted by national policy, there is also a lower threshold for its provision (six dwellings rather than the normal 11) in the Cotswolds Area of Outstanding Natural Beauty.
58. However, a more recent update of the viability evidence (December 2016 *Local Plan and CIL Viability Assessment – Second Update*) identifies that sheltered accommodation can now viably provide the standard requirement for affordable housing but that Extra-Care housing can only viably provide for reduced levels of 45% (high value zone), 35% (medium value zone) and 10% (low value zone). For the policy to be justified **MM11**, which adjusts the affordable requirements to accord with the most recent evidence, is therefore

necessary. This modification also ensures consistency with national policy in respect of off-site affordable housing provision in the AONB. However, for the **plan to be sound there is not a need for it to specifically refer to "rent to buy" properties.**

59. It has been argued that different affordable housing requirements should apply to the Oxford City housing needs which are to be provided for in West Oxfordshire. However, taking account of both need and viability, there is not any specific evidence to justify different requirements to those set out in policy H3. Nonetheless, it is appropriate for this matter to be kept under review, particularly in the preparation of the Area Action Plan proposed for the Oxfordshire Cotswolds Garden Village as detailed in Issue 8.

Policies H7 and H8 - Travelling Communities

60. As originally submitted for examination the plan (policy H7), in respect of the accommodation needs of gypsies, travellers and travelling showpeople, simply stated that identified needs would be met through the safeguarding and extension of existing sites and the provision of new sites subject to a number of criteria. During the suspension of the examination an updated ***Gypsy and Traveller Accommodation Assessment*** (2016) was prepared which, based on the current national planning definition of gypsies, travellers and travelling showpeople, identifies a need for five pitches and five plots from 2016 to the end of the plan period.
61. In the light of this evidence, and thus for the plan to be justified and consistent with national policy, **MM13 and MM14** are necessary. **MM13** indicates the evidence-based accommodation requirement for the 2016 – 2031 period. It also identifies that to provide for a five year supply of such accommodation, one to two pitches will be provided as part of the expansion/intensification of existing sites, that consideration will be given to the scope for such provision in strategic development areas and that three plots (out of a total of up to six) will be provided at an expansion of the **existing Cuckoowood Farm showpeople's site. Consistent with this**, new policy H8 (**MM14**) allocates land at Cuckoowood Farm and sets out appropriate criteria with which its development for up to six plots for travelling showpeople should accord. Concern has been expressed at the allocation of additional land at Cuckoowood Farm and at the potential for accommodation for travelling communities at the strategic development areas. However, there is an identified need for such accommodation and there is no convincing evidence **that the plan's requirements** in this respect are not soundly-based.
62. Through the 2016 assessment it is clear that there are plot and pitch requirements for people who ethnically identify themselves as being part of travelling communities but who do not fall within the current national planning definition of gypsies and travellers. In the light of the Public Sector Equality Duty and to ensure that the plan is justified, these needs are provided for through policy H4 (as proposed to be modified) as detailed below.

Policies H4 and H5 - Type and Mix of Housing and Custom and Self Build Housing

63. Policies H4 and H5 are, in principle, positively-prepared approaches to ensuring an appropriate mix of dwelling types in the district, in line with the requirements of paragraph 50 of the NPPF. However, **MM12** is necessary to

provide for the housing needs of people who identify themselves as being part of a travelling community but who are outwith the national planning definition of these communities.

64. Policy H4 also sets out requirements that a minimum of 25% of new homes should be accessible and adaptable housing and that at least 5% should be wheelchair adaptable dwellings. In effect these are the optional Building Regulations requirements M4(2) and M4(3) respectively. Following discussion at the hearings the Council prepared a paper (doc HOU22) to explain in more detail its justification for these requirements. The paper references relevant data from four Oxfordshire County Council documents on the housing needs of older people and people with disabilities. Whilst these do not provide direct and specific justification for the 25% and 5% requirements, in the light of this evidence the requirements are broadly reasonable. I reach this conclusion bearing in mind that the Public Sector Equality Duty is of relevance to this matter and that the requirements were appraised in the most recent plan viability assessment (doc VIAB6) and would not undermine development viability. Moreover, where viability is not compromised, I see no reason why new housing development should not seek to address the existing lack of provision of accessible/adaptable homes. Indeed, such an approach aligns with that for affordable housing. Different conclusions on this issue may well have been reached in other local plan examinations but they will have reflected the specific evidence in each case.
65. Nonetheless, as the viability assessment tested the requirements on developments of 50 units or more (as opposed to 11 units as set out in the plan as submitted), **MM12** is necessary for the plan to be justified, altering the threshold accordingly. For clarity, and thus effectiveness, this also rewords the policy to refer specifically to the M4(2) and M4(3) requirements.
66. Other than where it can be demonstrated to be unviable/not achievable, policy H5 requires that 5% of plots on residential developments of 100 units or more should be serviced and made available for custom or self-build housing, a type **of accommodation encouraged in paragraph 50 of the NPPF. The Council's** register of those seeking to acquire such plots numbered 183 people in November 2016 and 276 by April 2017. This already equates to 1.1% rising to 1.7% of the overall housing requirement figure and there is more than 12 years of the plan period left to run. I accept that some self/custom builders may prefer bespoke sites, but there is not any convincing evidence to indicate **that some would not wish to develop plots on 'mainstream' housing** developments. Given these figures and, in particular the rapid increase in demand for self-built housing, the 5% figure is a reasonable and soundly-based plan period requirement, **bearing in mind the policy's** viability/achievability clause and that it only applies to developments of more than 100 units.

Policy H6 - Existing Housing

67. Policy H6 sets out appropriate criteria with which changes to existing housing in the district should accord, in the interests of maintaining sustainable communities and a high quality environment. As such the policy is sound.

Conclusion

68. In conclusion, and subject to the above-mentioned modifications, **the plan's** strategy for new homes is positively-prepared, justified, effective and consistent with national policy.

Issue 2 –whether or not the plan's strategy for economic growth is positively-prepared, justified, effective and consistent with national policy

Policy E1 – Land for Employment

69. Whilst earlier evidence suggested a higher need figure, the 2015 *West Oxfordshire Economic Snapshot* indicates a requirement for around 27ha of additional employment land, during the plan period, to meet the committed **economic growth scenario on which basis the district's (and wider housing market area's) housing needs are based**. Whilst some scepticism has been expressed about the figure, there is no detailed and convincing evidence to counter this document.
70. The *Economic Snapshot* forecasts job creation figures and related employment land requirements for each of the plan's sub-areas - 3ha each for the Carterton, Chipping Norton and Burford-Charlbury areas, 8ha for the Eynsham – Woodstock area and 10ha for Witney. Moreover, the document recommends that the plan should allocate new sites, in particular in the Eynsham – Woodstock area, "to capture growth in the Oxford City Region".
71. As submitted for examination policy E1 provided for 20ha of employment land to the west of Witney, 10ha in Carterton, up to 7.3ha in Chipping Norton and at least 7ha elsewhere in the district. However, following the suspension of the examination, the Council proposed modifications to the policy reducing the provision at Witney, Carterton and Chipping Norton to 18ha, 6ha and 5ha respectively, to reflect realistic delivery. Whilst this is reduced provision, it still exceeds the evidence-based requirements for these towns. In particular the Council argues that the additional provision at Carterton and Chipping Norton, over and above the identified (in the *Economic Snapshot*) 3ha requirement, reflects local aspirations for increased employment. For Carterton the policy (as proposed to be modified) also states that further consideration will be given to additional employment sites in appropriate locations, which provides even greater support for local employment aspirations. In the light of this, and my findings below, I conclude that it is not necessary for soundness for the policy to include a higher specific employment land requirement/allocation figure for the town.
72. The modified plan also provides for a 40ha campus-style science park at the proposed Oxfordshire Cotswolds Garden Village, as a response to the *Economic Snapshot* recommendation that new employment sites should be allocated in the Eynsham – Woodstock area. This also aligns with **the Council's** aspiration for a campus-style science park in the district and would provide for longer term employment land requirements for beyond the plan period.
73. Supported by an independent economic view by SQW (*The Case for Growth at Carterton*, February 2017) arguments have been strongly made that the plan does not adequately or appropriately provide for new employment development in Carterton and is, thus, not positively-prepared. The SQW

report emphasises the employment impacts of the designation in 2012 of RAF Brize Norton as a 'Super-Base', including the transfer of some 2,500 jobs from RAF Lyneham to Brize Norton. It is stated that employment in 'off-base' contractors and suppliers has also expanded since 2012, and in January 2017 an MoD contract with Airbus was announced to support the A400M Atlas aircraft fleet, securing 200 jobs at the base and 200 elsewhere. The report argues that the anticipated increase (from 12 to 22 by 2019) in the number of such aircraft based at Brize Norton will require more jobs at Carterton to fly, maintain and service the fleet along with multiplier effects for the local economy and a consequent demand for more housing.

74. Providing the land for employment and housing to support this growth at RAF Brize Norton is argued by SQW to be of national significance. The *Economic Snapshot* recognises the importance of the base to the economy of Carterton and refers to the implications of its possible future expansion or contraction, although it makes clear that the extent of the former is unknown at the present time and there is no suggestion that the latter is likely. However, there is no clear evidence that, in reality, the expansion of the base which has taken place since 2012 has been hampered by the availability of employment land or housing in the Carterton area. Moreover, looking to the future, there is no suggestion from the RAF or MoD themselves that they envisage any future expansion at the base could be so constrained. Indeed, the RAF/MoD have not raised any concerns about the plan. In the light of all this I conclude that, at the present time, the plan is not unsound in relation to its response to the role of RAF Brize Norton.
75. The *Economic Snapshot* identifies a need for 3ha of additional employment land for Carterton although, notwithstanding this and as detailed above, in support of local aspirations, the plan, as proposed to be modified, provides for 6ha - double the objectively identified requirement. The *Economic Snapshot* also recommends that Carterton is identified as a priority area for economic regeneration and environmental enhancement. It states that, in practical terms, this may require the adoption of a masterplan for Carterton town centre "to deliver high quality urban realm and assemble attractive employment sites to encourage additional business activity to the town". Based on all that I have read, heard and seen on my visits to Carterton, it is clear that the town is in need of regeneration and, as detailed in Issue 6, the plan includes a policy to boost and enhance Carterton town centre. However, whilst it refers to the problem of an oversupply of old and poor quality industrial buildings in Carterton, the *Economic Snapshot* does not suggest that the provision of additional employment land, in excess of the 6ha which the plan provides for at Carterton, is necessary to achieve the regeneration it indicates is required in the town.
76. In the light of the above, and for policy E1 to be positively-prepared and justified, **MM15** is necessary. This includes in the policy reference to the campus-style science park at the Oxfordshire Cotswolds Garden Village and adjusts the employment provision at Witney, Carterton and Chipping Norton to reflect the realities of likely delivery. It is appropriate not to include a reference in the policy to the long term development potential of land to the west of Downs Road because there is not, at this stage, evidence to show that there are not other as, or more, suitable locations for this local employment growth in the Witney area. As proposed to be modified, the policy provides for

significantly more than the indicated 27ha requirement for employment land in the district. However, much of this is unlikely to be available until towards the end of, or even beyond, the current plan period and there is no persuasive evidence that the theoretical over-supply would be likely to cause any harm. Nonetheless, it is clearly **important that the success of the plan's policies in securing regeneration of Carterton is kept under close scrutiny**. Moreover it cannot be ruled out that review of the plan to respond to future expansion or changes at RAF Brize Norton will be necessary. However, at the present time, I conclude that the plan, subject to **MM15**, is sound in terms of the overall provision made for employment land and its distribution across the district including at Carterton.

Policies E2 – E6

77. Consistent with guidance in the NPPF (paragraph 28) policies E2 and E3 are, in principle, positively-**prepared approaches to supporting the district's rural economy**, including the re-use of non-residential buildings. Nonetheless, **MM16 and MM17** are necessary for the policies to be justified. The former requires that new buildings for rural economic uses are suitable in terms of their location and effect on the character and amenity of the area and the latter seeks to avoid the removal of features of historic interest in the re-use of buildings. Policy E4 sets out an appropriate strategy for promoting **sustainable tourism in the district**. The policy's aim to locate new tourism facilities in towns, service centres or villages is soundly-based, having regard to the NPPF principle of directing development to locations which are sustainable. However, the policy also appropriately identifies circumstances in which an alternative location may be acceptable and, in this regard, **MM18** is necessary for the policy to be justified. This allows an exception to the requirement for a town, service centre or village location where the tourist/visitor facility could not reasonably be located in such a settlement.
78. Policy E6 identifies five town centres in the district: Witney as the principal centre, Carterton and Chipping Norton as primary centres and Burford and Woodstock as town centres with a significant tourist role. Consistent with guidance in the NPPF, primary and secondary shopping frontages are identified for the principal and primary centres and appropriate requirements are set in terms of the uses which will be permitted in each. However, in the interest of clarity and, thus, effectiveness **MM20, MM21 and MM22** are necessary. These provide clearer statements on how development proposals will be assessed by the Council and include a cross-reference to policy T4 concerning parking provision.
79. It has been argued that the policy **E6's** stated resistance to the loss of shops and town centre uses in Burford and Woodstock should also apply to Charlbury. However, Charlbury is not formally designated by the plan as a town centre and there is not the evidence to indicate that it should be so. Moreover, policy E5, which seeks to retain and support the development of local services and community facilities, does apply to Charlbury. Subject to **MM19**, I am satisfied that policy E5 provides the same commitment to the retention of such facilities in Charlbury (and in indeed in the other Rural Service Centres) as is provided by policy E6 for Burford and Woodstock. **MM19** requires both (rather than one or other) of the policy's criteria to be met for a proposal which would result in the loss of a local service/community

facility to be permitted. **MM20** explains the application of this to the Rural Service Centres. It is not necessary for soundness for the policy itself to refer to the NHS Disposal Strategy and proposals arising from this strategy will not necessarily conflict with the policy. Moreover, if they do, it is appropriate that they are considered against the justified requirements of the policy and any other relevant plan policies to assess whether or not they accord with the plan as a whole.

Conclusion

80. In conclusion, and subject to the above-mentioned modifications, **the plan's** strategy for economic growth is positively-prepared, justified, effective and consistent with national policy.

Issue 3 – whether or not the settlement hierarchy and spatial strategy are justified, effective and consistent with national policy

Settlement Hierarchy

81. Table 4.1 details the settlement hierarchy for the district which influences policies in the plan concerning the location of development. As originally submitted for examination, three Main Service Centres are identified (Witney, Carterton and Chipping Norton) along with six Rural Service Centres (Bampton, Burford, Charlbury, Eynsham, Long Hanborough and Woodstock). Some 32 named villages are also listed and the lowest tier of the hierarchy comprises un-named small villages, hamlets and the open countryside. The hierarchy is based on the *Settlement Sustainability Report*, originally of 2013 but updated to November 2016. This scores the 41 main settlements in the **district against twenty or so "positive indicators" of sustainability**, reflecting the presence or otherwise of various services.
82. Appropriately, the nine highest scoring settlements are identified as either a Main Service Centre or a Rural Service Centre. The Main Service Centres of Witney and Chipping Norton are the two highest scoring settlements. Whilst Carterton, in fourth place, scores slightly lower than Eynsham, the plan appropriately designates Carterton **at the district's third** Main Service Centre. This reflects that, in terms of population, it is the **district's second largest** settlement and that there are aspirations for significant enhancement of its town centre/services. The lower scoring settlements are categorised as villages.
83. Following the suspension of the examination, the Council proposed modification to the hierarchy to include the Oxfordshire Cotswolds Garden **Village as a Rural Service Centre and to 'downgrade' Long Hanborough** to a village. Although the garden village does not yet exist, its development, to be led by an Area Action Plan, **is a key element of the plan's approach** to addressing a share of the unmet housing needs of Oxford City. I consider in Issue 8 the principle of the garden village and its relationship with Eynsham. However, it is intended that this settlement would provide facilities to cater for many of the day to day needs of its residents and, as such, it is appropriate that it should be planned to operate as a Rural Service Centre. Its designation as such is therefore soundly-based.

84. With the emergence of the garden village the Council has argued that Long Hanborough should be designated as a village rather than a Rural Service Centre because, otherwise, there would be four Rural Service Centres relatively close together in the Eynsham – Woodstock sub-area of the district. However, the basis of the settlement hierarchy is the facilities that each settlement has or is intended to provide. There is no reason why the development of the garden village should affect the existing facilities at Long Hanborough and, therefore, it is appropriate for it to continue to be designated as a Rural Service Centre.
85. Consequently, modification to the plan as originally submitted is not necessary in respect of Long Hanborough. However, for the plan to be justified by the evidence, **MM1** is necessary to include the Oxfordshire Cotswolds Garden Village as a Rural Service Centre. This modification also includes Ascott under Wychwood as a named village, which was omitted in error from the plan as submitted for examination. It has been argued that some of the other named villages should instead be designated as Rural Service Centres (eg Middle Barton) and that others still should not be named villages at all. However, bearing in mind the scores the settlements achieve in the **Settlement Sustainability Report**, I conclude that their designation as villages is sound.

Spatial Strategy

86. As a relatively large district, with its population dispersed across a number of Main Service Centres, Rural Service Centres and villages, it makes sense for the plan to be based on five sub-areas. The Witney, Carterton and Chipping Norton sub-areas comprise the three designated Main Service Centres and their hinterlands. The Burford – Charlbury sub-area consists of the majority of the part of the Cotswolds Area of Outstanding Natural Beauty (AONB) which lies within the district and includes the Rural Service Centres of Burford and Charlbury. The Eynsham – Woodstock sub-area comprises the parts of the district closest to Oxford. There is little to suggest that these sub-areas are not an appropriate basis for the plan.
87. In preparing the plan as originally submitted for examination three main options for the strategic distribution of new development were considered and appraised: (i) the concentration of development at Witney; (ii) the concentration of development at Witney, Carterton and Chipping Norton (the three Main Service Centres); and (iii) the dispersal of development across a large number of towns and villages. Concentration of development at the three main towns, with limited dispersal elsewhere, was identified as the most appropriate approach and one which commanded a broad level of support. Reflecting this, policy OS2, as originally submitted for examination identifies that new homes and jobs will be primarily focussed in Witney, Chipping Norton and Carterton, that Rural Service Centres will be suitable for a scale/type of development to reinforce their existing role, that villages are suitable for limited development to maintain their vitality and that elsewhere development will be restricted other than in connection with specific exemptions. Supporting this policy, and having regard to the **plan's**, then, housing requirement figure of 10,500 dwellings, policy H2, as originally submitted, detailed the following housing distribution by sub-area: Witney (3,700), Carterton (2,600), Chipping Norton (1,800), Eynsham – Woodstock (1,600) and Burford – Charlbury (800).

88. As detailed in Issue 1, during the suspension of the examination the Council proposed that the plan should provide for a significantly increased housing requirement figure for West Oxfordshire itself and for 2,750 dwellings in **respect of Oxford City's housing needs. In the light** of this, options for the strategic distribution of new development were necessarily reconsidered including, in addition to the original three options, the concentration of development along transport corridors and the option of a new village. Subsequently, the Council has proposed the modification of the plan such that it reflects a combination of the three main towns/limited dispersal strategy and the provision of a new village, designed primarily to provide for Oxford **City's unmet housing needs**. In terms of the new village it makes sense for this to be located in the Eynsham – Woodstock area, the part of the district closest to Oxford. I consider the new village in more detail in Issue 8 and arguments that the housing needs it is intended to accommodate could be better catered for elsewhere in this sub-area in Issue 4.
89. Reflecting this approach the Council has proposed modification of policy OS2 to, in summary, identify that:
- A significant proportion of development will be located within/on the edge of Witney, Carterton and Chipping Norton;
 - Eynsham will make a significant contribution towards meeting the needs of both the district and Oxford City;
 - Woodstock is suitable for a reasonable scale of development;
 - Burford, Charlbury, Bampton and Long Hanborough are suitable for a modest level of development;
 - The villages are suitable for limited development; and
 - Elsewhere development will be limited to that which requires and is appropriate in a rural location.
90. In line with this approach policy H1 (as proposed to be modified) indicates that it is anticipated that the new homes will be distributed as follows: Witney sub-area – 4,702 ; Carterton sub-area – 2,680; Chipping Norton sub-area – 2,047; Eynsham – Woodstock sub-area – 5,596 and Burford – Charlbury sub-area – 774. The total figure for the Eynsham – Woodstock area includes the 2,750 dwellings **to be provided for in this area in respect of Oxford City's housing needs**. The figures total 15,799 dwellings, 99% of the overall plan period housing requirement. Given that there are more than 12 years of the plan period left to run and that the plan will be reviewed before then, the plan is not unsound in not quite providing for 100% of the overall housing requirement at this stage. The NPPF does not require that a plan allocates specific sites to meet the housing requirement for the full plan period.
91. The above figures are not definitive sub-area housing requirements but are indicative distribution figures based on dwellings already constructed during the plan period, existing commitments, compelling (conservative) estimates of future windfall housing developments and housing site allocations proposed in the plan which reflects those deemed suitable and deliverable through the site selection process. The policy makes clear that the figures are not to be taken

as an absolute target or a maximum ceiling. In particular the indicative numbers of windfall dwellings set out in paragraph 5.34a of the supporting text are just that and are, in no way, a cap on plan-compliant windfall housing development; nor would they be likely to justify otherwise unacceptable housing schemes. The indicative figure for the Burford – Charlbury sub-area is considered in detail in Issue 9.

92. In the absence of any evidence to indicate housing requirement figures for each sub-area, **this “bottom up” approach is a sensible starting point for determining the distribution of housing across the district.** Although others disagree, **it is the Council's view that it results in a distribution which accords with the ‘three main towns/limited dispersal plus a new village’ spatial strategy.**
93. The indicative figures would result in 71% of West **Oxfordshire's** own housing needs being located in the Witney, Carterton and Chipping Norton sub-areas. The majority of this would be within or immediately adjoining the Main Towns themselves. The remaining 29% would be spread across the Eynsham – Woodstock and Burford – Charlbury sub-areas.
94. I consider the soundness of development proposed within each sub-area, and also the appropriateness of the 774 indicative housing figures for the Burford – Charlbury sub-area, as part of the consideration of the sub-area strategies in Main Issue 5 – 9. However, in my view the 71%-29% split is consistent with a spatial strategy of focussing **the district's own** development needs in the main towns with limited dispersal elsewhere. **Moreover, the plan's intention that the 2,750 dwellings to cater for Oxford City's needs should be accommodated in the Eynsham – Woodstock area, predominantly at the Oxfordshire Cotswolds Garden Village, aligns with the “new village” element of the plan's overall spatial distribution.**
95. Concern is also expressed at the proportion of new housing provided for through the plan in each of the Main Town sub-areas. In particular it is argued that more housing should be located in Carterton and less at Chipping Norton and Witney. However, as already indicated there is no specific evidence to indicate housing needs below the district level and the proposed distribution reflects the allocation of sites for housing deemed suitable and deliverable through a site selection process which, as detailed in Issue 4, I conclude is robust. In any case, the distribution between these three sub-areas appropriately results in the Witney sub-area (which has the highest population) having the highest indicative housing figure and the Chipping Norton sub-area (which has the lowest population) having the lowest indicative housing figure. It is the case that, relative to the existing population of the towns, proportionately more new housing is proposed in Chipping Norton than in Carterton, but for the plan to be sound it is not necessary for it to exactly correlate new housing with existing population. It is also notable that the **Settlement Sustainability Report** indicates that Chipping Norton scores more highly in sustainability terms than Carterton.
96. More housing in the Carterton sub-area has also been argued as necessary in the light of expansion of employment at Brize Norton RAF base and, more generally, to assist in the regeneration of the town. In this context there has also been debate about the extent of out-commuting from Carterton. I have

dealt with implications of the Brize Norton RAF base in Issue 2 and conclude that this does not currently justify the provision of additional housing in Carterton beyond what is proposed in the plan. Moreover, whilst the *Economic Snapshot* emphasises the importance of regenerating Carterton, it recommends achievement of this through improvements to the town centre and the public realm and does not indicate that the provision of more than the 2600 dwellings already provided for in the plan in the Carterton sub-area would be the appropriate approach in this respect. I have found the evidence on the extent of out-commuting to be inconclusive but, either way, it does not suggest to me that the plan's provision for housing in Carterton is unsound.

97. On the other hand it is argued that the indicative housing figure for the Eynsham – Woodstock area reflects inappropriately high housing provision in Woodstock. However, so long as it is appropriately sensitive to the setting of the nearby Blenheim Palace World Heritage Site (considered in detail in Issue 8), I consider that Woodstock is suitable for a reasonable scale of development. It has a good range of facilities and achieves the same unweighted and weighted score as Carterton in the most recent *Settlement Sustainability Report*. Moreover, amongst the ten Main and Rural Service Centres, it is second only to Eynsham in its proximity to the jobs and services of Oxford and is connected to it by frequent, high quality bus services. It is also important to note that provision for some new housing in settlements other than the **three main towns is a fundamental aspect of the plan's spatial strategy**. It is not the case that the plan should only propose new housing in other settlements where it cannot be accommodated in the main towns. **Policy's OS2's statement that there should be** a modest level of development at Long Hanborough is justified by the *Settlement Sustainability Report*, its sustainability score being similar to that of Bampton (also proposed for modest level development) and materially below that of Woodstock and Eynsham.
98. In conclusion on this point, and in the light of the need **to increase the plan's** housing requirement figure (Issue 1), it is also necessary, for the plan to be positively-prepared, justified and effective, to modify the distribution of development across the district as set out in broad terms in policy OS2 (**MM2 and MM3**) and in terms of the indicative housing numbers in policy H1 (**MM8**): Witney 4,702, Carterton 2,680, Chipping Norton 2,047, Eynsham – Woodstock 5,596 and Burford – Charlbury 774.

Application of the Spatial Strategy

99. Policy H2 sets out the application of the spatial strategy in relation to housing. It indicates the circumstances in which new dwellings will be permitted: (i) on sites allocated for such development, (ii) on unallocated sites within Main Service Centres, Rural Service Centres and villages, and (iii) in small villages, hamlets and the open countryside. Having regard to the settlement hierarchy and spatial distribution of development and the aim of national policy to actively manage patterns of growth to make fullest possible use of public transport, cycling and walking (NPPF para 17), the criteria of policy H2 are broadly justified. However, where not in conflict with other plan policies, there would, in most instances, be little justification to permit new dwellings on undeveloped land within the built-up area only if it is necessary to meet identified housing needs. **MM9 and MM10**, which remove the housing needs requirement in this case, are therefore necessary for the plan to be justified.

These modifications also appropriately allow for new dwellings on previously-developed land adjoining the built-up area, again subject to compliance with other plan policies; arguably such land would form part of the built-up area in any case. I recognise that in the AONB it is possible that development **compliant with these criteria could, nonetheless, cause harm to the area's** landscape or scenic beauty. However, such development would be contrary to policies OS2 and EH1a and could, thus, be appropriately resisted.

100. As submitted for examination policy H2 allows for new housing on undeveloped land adjoining the built-up area only where it accords with other plan policies and is necessary to meet identified housing needs. The more restrictive approach to housing outside settlements and its limitation to land adjoining built-up areas **is justified by the NPPF's core planning principle of** recognising the intrinsic character and beauty of the countryside. However, in order that this policy would not undermine the overall spatial strategy, it is necessary to require that such development also accords with the distribution of development set out in Policy H1 (**MM10**). It has been argued that policy **H1's indicative number of dwellings in each sub-area** would, in effect, stifle otherwise appropriate windfall development. However, this is unlikely to be the case as policy H1 makes clear that the indicative distribution is not to be taken as either an absolute target, or a maximum ceiling on development in any of the sub-areas. Refusal of permission for a windfall housing scheme on the basis of conflict with this aspect of policy H1 would only be likely if a single, extremely large windfall development or the cumulative effect of numerous smaller ones were to substantially alter the overall distribution of housing between the sub-areas.
101. **MM9** is also required to explain in broad terms what is meant by the policy's reference to "identified housing needs", both within the AONB and the rest of the district. This paragraph and policy H2, read together with policies OS2 and BC1 and their supporting text (as proposed to be modified), are clear that there is not an embargo on windfall housing in the AONB, but that, reflecting **the great weight that must be given to conserving the area's landscape and scenic beauty**, robust justification will be required to be demonstrated for new housing. However, I have slightly altered **MM7** from that consulted on in order to ensure consistency with other parts of the plan in respect of development in the AONB. If, as has been suggested, these policies were to be more prescriptive (either in permissive or restrictive terms) they would lack appropriate flexibility and would run the risk of either acceptable development being prevented or unacceptable schemes being permitted. Moreover, the plan must be read as a whole and, thus, the policies of relevance to the AONB do not need to repeat each element of each other. These policies and supporting text reflect the local context of the AONB in West Oxfordshire and, whilst they add to the content of paragraphs 115 and 116 of the NPPF, they are not inconsistent with them.
102. Finally, policy H2 also requires the delivery of all new dwellings to be consistent with a number of general principles. In the interests of clarity, and thus effectiveness, these principles are appropriately moved from policy H2 to policy OS2 in the Overall Strategy section of the plan. **MM3 and MM10** provide for this.

103. In conclusion, subject to the above-mentioned modifications, the settlement hierarchy and spatial strategy are justified, effective and consistent with national policy.

Issue 4 – whether or not the sites allocated for new housing in the plan have been selected through a proportionate, objective and robust process

104. The housing sites allocated in the plan, as originally submitted for examination, were, in the first instance, informed by the *Strategic Housing Land Availability Assessment* (SHLAA) of June 2014. The SHLAA appraised all sites which had emerged through a “call for sites” exercise and which could potentially accommodate 10 dwellings or more. However, at that stage, the plan sought only to allocate strategic development areas (SDAs) for housing and the SHLAA appraised nine potential SDAs in terms of availability, suitability, achievability and deliverability in line with the *Planning Practice Guidance*. The assessment considerations cover a wide range of factors including policy constraints, flood risk, accessibility, and amenity and of likely landscape, ecology and heritage impacts. Additionally, the SHLAA considered the potential for constraints to development to be overcome. It is notable that many of the sites appraised are beyond the existing built-up area and, thus, a degree of harm to the landscape is, in most cases, inevitable. In this context the SHLAA appropriately considered, having regard to the potential for mitigation, whether or not such harm would be acceptable or unacceptable.
105. The SHLAA was informed by more detailed evidence including a comprehensive *Assessment of Strategic Site Options*, focussing on the **district's three main towns**, originally prepared in October 2012 but updated in June 2014. This document itself is based on a wide range of evidence, including transport appraisals, landscape assessment work, consultation responses from statutory bodies and information submitted as part of planning applications.
106. During the suspension of the examination, and in the light of the increased housing requirement figure subsequently proposed, the Council undertook a further “call for sites” and then prepared the *Strategic Housing and Economic Land Availability Assessment* (SHELAA) of December 2016. This is similar in approach to the 2014 SHLAA but considers sites with the potential to accommodate five or more dwellings and also for use for employment purposes. Appropriately, it also reconsidered density assumptions and the potential to expand a number of sites. The SHELAA report details the approach adopted and summarises the results of the assessment. The main report is supported by a weighty appendix containing a two-page assessment and conclusion in terms of suitability, availability and achievability for development of nearly 300 sites. Brief, yet specific, justification is given for the conclusion on each site, with references included to more detailed evidence. As with the SHLAA, the SHELAA is appropriately informed by the conclusions of the *Assessment of Strategic Site Options*, which had been further updated to February 2015.
107. In view of the increased housing requirement, and based on the 2016 SHELAA, the Council has proposed modification of the plan to allocate an additional Strategic Development Area, to identify a Strategic Location for Growth, to increase the indicative number of dwellings on the three SDAs

originally included in the plan and to allocate 15 non-strategic sites for residential development. Around 40 other sites were identified in the SHELAA as being potentially suitable for housing development, but were not proposed by the Council for allocation in the plan. Table 6 of the *Housing Site Selection Paper* (doc EXAM 007), prepared following the Stage 2 hearings, details the reason why each of these sites were not included in the plan. The reasons include permission already having been granted for housing on the site, the site being too small to warrant a formal local plan allocation and questionable deliverability. I am satisfied that this is robust reasoning.

108. The increased housing requirement for the district includes 2,750 dwellings to meet a proportion of the housing needs of Oxford City as agreed by the Oxfordshire Growth Board. The sites proposed by the Council as modifications to the plan in respect of this housing (ie to the north and to the west of Eynsham) were appraised and deemed suitable through the December 2016 SHELAA. However, the Growth Board's decision that 2,750 dwellings is an appropriate contribution for West Oxfordshire to make towards Oxford City's housing needs was influenced by the conclusion of the September 2016 *Oxford Spatial Options Assessment*. As part of an assessment of sites in each of the five Oxfordshire districts, this appraised the suitability of six sites in West Oxfordshire to provide for some of the city's housing needs. The *Spatial Options Assessment* was supported by transport and education assessments. The *Housing Site Selection Paper* (doc EXAM 007) details at Table 7 the reasoning for the conclusions set out in the September 2016 officer report to the Growth Board recommending the suitability of the North and West Eynsham sites and the rejection of the other four West Oxfordshire sites.
109. The six sites appraised by the *Spatial Options Assessment* were themselves a short list of ten possible sites initially considered, one of which was subsequently taken forward by Cherwell Council. The rejection of three of the ten, at a "Check and Challenge" workshop in October 2015, on the basis of their distance from Oxford (sites in Carterton) and insufficient individual site size (sites in Long Hanborough, including land to the south west of the station) was, to my mind, reasonable. Whilst there could potentially be some advantages (eg earlier delivery) in providing for Oxford's unmet housing needs across a greater number of smaller sites in West Oxfordshire, the decision that in West Oxfordshire the needs would be best met in a smaller number of larger sites is not unjustifiable, bearing in mind NPPF paragraph 52's statement that the supply of new homes can sometimes be best achieved through planning for larger scale development. Moreover, the fact that the Council chose to submit to Government an expression of interest for garden village status for the North of Eynsham site before the Growth Board had reached its conclusions does not, in itself, mean that the site selection process which informed the preparation of the Local Plan is not robust.
110. It is inevitable that many of the conclusions reached in the site selection evidence detailed above are ones of planning judgement, both in relation to specific impacts (eg on the landscape) and in terms of the weight given to the various, and sometimes competing, appraisal considerations. It is therefore not surprising that some people disagree with a number of the conclusions reached. However, in addition to all the housing sites allocated in the plan as proposed to be modified, I have visited a number of the sites rejected through

the site selection process, in order to audit the robustness of the site selection process.

111. In terms of the strategic sites rejected as SDAs in Witney and Carterton (land at South Witney, West of Downs Road and North East Witney and at West Carterton and North Carterton) my visits to all these confirm as reasonable the **Council's judgements**, in particular that development of these sites would not be well-related to the existing built-up area, in terms of either character/appearance or accessibility. Moreover, notwithstanding that some of **these sites may 'perform' better in terms of certain appraisal considerations** (eg impact on heritage assets) than sites identified by the SHLAA to be suitable for development, the stated reasons are ultimately reasonable bases on which to deem them unsuitable for development.
112. It also has been argued that the plan modifications proposed by the Council following the suspension of the examination, which increase the number of dwellings envisaged at the North Witney, East Witney and East of Chipping Norton SDAs, run counter to conclusions on landscape impact in the site selection evidence which informed the plan as originally submitted for examination. I consider this matter in the detailed assessment of each of these sites in Issues 5 and 7 below but conclude that the sites, at the modified scale, have not been inappropriately allocated in the plan.
113. Moreover, in terms of the sites identified to meet a proportion of Oxford City's housing needs, and having regard to the detailed appraisal evidence in the **Spatial Options Assessment** and my visits to the possible alternative locations, I see no reason to conclude as being unreasonable the officer advice to the Growth Board (detailed in Table 7 of the **Housing Site Selection Paper**) on the specific sites in the district to be pursued, and which were subsequently included in the plan as proposed to be modified.
114. I recognise that at least one site deemed as unsuitable for development in the SHLAA/SHELAA has secured permission for housing development at appeal. Land adjacent to Hanborough Station is judged unsuitable for housing development in the SHLAA on the basis of landscape harm, including its effect on an informal **green gap, and because of the site's distance from the services and facilities at the centre of the village**. In determining the appeal the Inspector identified harm in respect of the landscape, including the loss of the green gap. However, in the context of there not being, at that time, a five year supply of deliverable housing land in the district, he concluded that the adverse impacts of the development would not significantly and demonstrably outweigh the benefits. This demonstrates application of the **"tilted balance"** required by paragraph 14 of the NPPF in the particular circumstance of this appeal. However, this is not the appropriate basis on which to undertake the initial appraisal of sites for inclusion in a local plan. Moreover, effects on landscape are inevitably matters of judgement. Thus, even had the Inspector identified no harm to the landscape in this case it would not, as a matter of **course, mean that the Council's judgement** that harm would result had been an unreasonable one.
115. From the evidence I have seen it appears that the Council and appellant were, in this case, agreed that there are a range of services and facilities within walking and cycling distance of the site. The appeal decision notes that the

centre of Long Hanborough is about 1.5km away. Whilst this was not judged to be good reason to refuse permission for the particular development which **was the subject of the appeal, I nonetheless conclude that the Council's** judgement that it was a factor, together with others, warranting rejection of the site for allocation in the plan was a reasonable one. Of relevance here is the *Planning Practice Guidance's* statements that, whilst a land availability assessment should not be constrained by the need for development, should it result in insufficient suitable sites being identified to **meet the area's needs it** is necessary to revisit the assessment and, in particular the constraints which have resulted in sites being deemed unsuitable. In West Oxfordshire the SHELAA identified sufficient suitable sites to meet the need and, thus, a revisiting of the constraints considered in the assessment was not necessary.

116. The evidence on site selection identifies that there is uncertainty in respect of some of the likely impacts of development of a number of the appraised sites. In other cases it is apparent that detailed conclusions in the site selection documents are not supported by other evidence put before the examination. There is also discrepancy between the indicative boundary of the Oxfordshire Cotswolds Garden Village as identified in the plan as a strategic location for growth and the boundaries of the site as appraised through the SHLAA/SHELAA and Spatial Options Assessment. However, such occurrences are almost inevitable when appraising in the order of 300 sites and having regard to a very wide range of considerations. Whilst it would be technically possible to commission more detailed work in an attempt to resolve such uncertainties, discrepancies and competing evidence, this would inevitably take a considerable amount of time, delaying preparation and adoption of the plan, and would, in any case, be unlikely to result in conclusions with which everybody agrees. Moreover, it is an emphasis of both the plan-making section of the NPPF and of the PPG that a local plan should be supported by proportionate evidence. I am satisfied that none of the uncertainties or discrepancies in the site selection evidence fundamentally undermines its robustness.
117. As referred to in Issue 7, more detailed evidence as part of the preparation of a planning application has identified that the East Chipping Norton SDA can appropriately accommodate 1200 dwellings, rather than 1400 as indicated in the SHELAA. However, this does not fundamentally undermine the SHELAA as appropriate evidence to support local plan preparation. Moreover, whilst the SHELAA concludes that sites in the AONB, at one stage proposed by the Council for allocation in the plan, are in principle suitable for housing development, this assessment does not take account of housing need in the AONB. It is the lack of evidence in this particular regard which has been key to my conclusion (Issue 9) that these sites should not be allocated in the plan. Consequently, my conclusion does not undermine the robustness of the SHELAA.
118. In contrast with the approach adopted by some local authorities the Council has not sought to score sites in terms of acceptability for development in the SHLAA/SHELAA. Whilst such an approach is appropriate in the circumstances of some areas and avoids the need for every site to be formally deemed as either suitable or unsuitable for development, it runs the risk of oversimplifying what are frequently complex, balanced planning judgements.

Moreover, the *Planning Practice Guidance* does not indicate that this approach is a prerequisite to a robust site selection process.

119. Concurrent with the SHLAA, SHELAA, *Assessment of Strategic Site Options* and the *Oxford Spatial Options Assessment*, preparation of the plan has also been informed by several iterations of Sustainability Appraisal (SA). In connection with site selection the SA appraised the housing sites allocated in the plan against reasonable alternatives which are those sites of Strategic Development Area size considered in the SHLAA/SHELAA and those, smaller sites, deemed to be potentially suitable for housing in the SHLAA/SHELAA but which were not proposed by the Council for allocation in the plan. In my assessment of legal compliance above I have concluded that the Sustainability Appraisal is adequate and, on this basis, I conclude that it also constitutes a robust element of the site selection process. Moreover, whilst its conclusions are not in all respects identical to those in the SHLAA/SHELAA, there is not inconsistency of such significance as to materially undermine the overall site selection process.
120. In an ideal world the site selection considerations and conclusions informing a local plan would be set out in a single, comprehensive yet concise document. However, that is simply not feasible in the case of West Oxfordshire where the plan has been prepared over a period of more than seven years and has had to be modified to reflect a number of changing circumstances, including a revised OAN figure for housing and agreement by the Oxfordshire Growth Board on the number of dwellings to be accommodated in the district in support of Oxford City's housing needs. However, there is a relatively limited suite of key site selection evidence documents as identified above and the *Council's Housing Site Selection Paper* provides an effective route map through these. In explaining the site selection decisions made by the Council and its partners, this paper includes "copied and pasted" sections of previously-published documents. To my mind this is a positive rather than a negative point, demonstrating that the key evidence in this respect has not been retrospectively formulated. Overall, the site selection evidence is not unmanageable and is able to be satisfactorily interrogated.
121. It is always the case that more wide-ranging or more detailed evidence could be prepared in support of the preparation of a local plan, or that the conclusions on decisions reached could be set out more comprehensively. However, whatever the volume and detail of appraisal work undertaken, as site selection involves planning judgements to be made at a number of different levels it is almost inevitable that some people will disagree with the results. Overall, I conclude that the Council has employed a proportionate, objective and sufficiently robust process in selecting the sites for housing development allocated in the plan.

Issue 5 – whether or not the plan sets out a soundly-based strategy for the Witney sub-area

Policy WIT4 – Witney Sub-Area Strategy

122. Policy WIT4 sets out the overall strategy for the Witney sub-area, appropriately identifying that the main focus for new development will be within/adjoining the town of Witney itself. It details the housing and

employment development proposed for the area and the infrastructure necessary to support this. I deal below with the soundness of each of the housing allocations referenced in the policy, but, in line with my conclusions on the overall housing requirement figure and the district-wide distribution of development (Issues 1 and 3 above) and for the plan to be positively-prepared, **MM49** is necessary to increase to an indicative figure of 4,702 the new homes to be provided for in the sub-area and to reflect the full range of sites now allocated for housing. In order that the policy is justified **MM49** also includes reference to heritage assets (the wording slightly altered from that consulted on for consistency with national policy), transport and green infrastructure and deletes reference to the "particularly vulnerable gap between Witney and Ducklington", there being no clear definition of this gap and there being other plan policies which seek to ensure that development protects the character of the district. The policy is sound in not making reference to west of Down's Road as an area of future long term development potential, because there is not currently the evidence to indicate that at such time it would be the most appropriate direction of growth in comparison with any other possible alternatives.

Policy WIT3 – Witney Town Centre Strategy

123. Policy WIT3 provides a positively-prepared strategy to maintain and enhance Witney town centre as the main shopping and leisure destination in the district. Nonetheless, for the policy to be justified, **MM48** is necessary, which ensures that it provides more clarity in terms of how retail proposals will be considered and appropriately addresses the Witney Conservation Area and other heritage assets. However, planning decisions will routinely involve the balancing of different plan policies and of the likely benefits and dis-benefits of development proposals. For the plan to be sound it is, thus, not necessary for the policy to refer to the need to balance heritage impacts with other effects of development.

Policy WIT2 - North Witney Strategic Development Area

124. Policy WIT2, as proposed to be modified, provides for around 1,400 new homes on around 60ha of land to the north of the existing built-up area of Witney. The size of the site and the indicative number of houses have been increased since the plan was originally submitted for examination, reflecting the increased housing requirement as detailed in Issue 1. The site is relatively close to Witney town centre and the southern parts of it, at least, are within a **reasonable walking distance of the district's main centre for shopping and leisure**.

125. The site is located in an area of acknowledged high landscape sensitivity and concern has been raised at the intention to provide for around 1,400 dwellings in the light of the 2012 *Kirkham Landscape Study*, which indicates the estimated housing capacity of the site as 750-800 dwellings. However, the report makes clear that capacity recommendations are only estimates and that final numbers will depend on a number of factors including more detailed assessments and housing needs. To my mind this indicates that the conclusions on landscape impacts are not absolute ones and need to be balanced against the need for housing.

126. **In common with most of the plan's** greenfield housing allocations (and many of the other appraised sites) the loss of countryside associated with the North Witney development would result in some harm to the landscape. The Kirkham report recommendations and estimated housing capacity figure sought to minimise the landscape effects of housing development. However, it does not mean that unacceptable harm to the landscape would inevitably be caused if more than the estimated 750–800 dwellings are accommodated on the site. Notably, the higher number of dwellings proposed since the plan was originally submitted reflects an increase in the size the site (the addition of the land to the west of Hailey Road) and higher density development, together with the context of the significantly increased housing requirement figure for the district.
127. In the light of this, and having visited the site and surrounding area on a number of occasions including from the viewpoints suggested by representors, I conclude that there is a realistic prospect that the overall site (including the land to the west of Hailey Road) could accommodate around 1,400 dwellings without resulting in unacceptable harm to the landscape, when balanced against the advantages of the development. In reaching this conclusion I have noted that the land to the west of Hailey Road has not been the subject of a specific landscape assessment and that development would be likely to take place near, but not higher than, the 100m contour.
128. A relatively small part of the site is in flood zones 2 and 3. Doc ENV5 sets out a sequential test appraisal of the site in this respect and I am satisfied that its conclusions are sound, particularly bearing in mind that there is no objection from the Environment Agency and that it is feasible and intended that built development would not take place outside flood zone 1. It is clear that significant infrastructure will be required in respect of drainage and sewerage and that detailed work in this regard still needs to be undertaken. Policy WIT2, as proposed to be modified, allows for mitigation measures to be offset if necessary. However, it appears to me that the scale of the issues to be addressed are not particularly unusual for a housing development of this size and there is little to suggest that there is a not a realistic prospect of them being satisfactorily resolved through the planning application process. Policy WIT2 appropriately requires this.
129. Evidence demonstrates that, to be acceptable in transport terms, development of 1,400 dwellings would require the construction of the West End Link Road, a road which would have significant wider benefits for Witney, helping to reduce existing congestion and air quality problems on Bridge Street. However, given that there is not currently evidence to demonstrate how many dwellings could be occupied without the need for the new road, it is necessary for the policy and supporting text to be modified. **MM45** achieves this by requiring development to be phased in accordance with the timing of supporting infrastructure. This provides for securing the link road at the appropriate time (to be evidenced by detailed transport appraisal work) but the plan appropriately remains clear in stating that the road will be required for the full development. I have slightly altered the wording of the modification as consulted on to improve its clarity in this respect. The North Witney development has the potential to increase traffic on a number of other roads in the area. The narrow, New Yatt Road has been raised as a particular concern, although I concur with the Highway Authority that traffic calming

measures could be employed to address such problems and a criterion of the policy provides for this.

130. The requirement for a compulsory purchase order to enable the construction of the West End Link Road cannot be ruled out and this could delay full build-out of the site beyond that currently forecast by the Council. However, that does **not make the Council's forecasts completely unrealistic and nor does it mean** that the allocation is not sound. I deal in Issue 10 with the implications of this for housing supply in the district.
131. Overall, I conclude that the significant contribution the allocation would make **to meeting West Oxfordshire's** housing requirements, on a site adjoining the **district's main town** and relatively close to its shopping centre, outweighs the harm likely to be caused by the development. As such, and in order that the plan is positively-prepared, modifications (**MM45**) are needed to policy WIT2, as originally submitted, to provide for about 1,400 dwellings on the site. For the policy to be justified, effective and consistent with national policy the modification also requires comprehensive development of the site to be led by an agreed masterplan, for it to conserve, and where possible, enhance specific heritage assets, for appropriate archaeological investigation and to allow for the possibility of off-site flood mitigation measures. It also updates the education requirements to reflect more recent evidence but with an appropriate level of flexibility.
132. My conclusion that the allocation is likely to be acceptable in landscape terms is based on the area of environmental enhancement shown on the policies map (Fig 9.4) and, on this basis, there is not good reason for this area to be altered or shown to be indicative. It would not be appropriate to base a local plan allocation policy/the policies map entirely on the emerging plans of one particular developer. However, if at planning application stage convincing evidence is provided that an alternative approach would achieve the same or better outcome in terms of the landscape, I am confident that the Council would apply appropriate flexibility in determining the application. **The policy's requirement that development should make "appropriate" contributions** towards Local Transport Plan (LTP4) schemes is sound; it is not feasible at the local plan stage to define more precisely which schemes will be relevant to this requirement at the point of the determination of a planning application and, again, it would not be right to base a housing allocation policy entirely on the emerging plans of a specific developer. However, **the word "appropriate"** ensures that the development would not be required to make unreasonable contributions.

Policy WIT1 - East Witney Strategic Development Area

133. Policy WIT1, as proposed to be modified, provides for around 450 new homes on two sites to the east of the existing built-up area of Witney. The sites are relatively close to Witney town centre and there are attractive footpaths by which the town centre could be easily accessed by pedestrians.
134. As with the North Witney site concern is raised about the intention to accommodate 450 homes on the sites when the 2012 ***Kirkham Landscape Study*** indicated an estimated housing capacity of 250-300 dwellings. However, once again the report makes clear that this capacity recommendation is only

an estimate and that final numbers will depend on a range of factors including more detailed assessments and housing needs. **Like most of the plan's** greenfield housing allocations and the other sites appraised in preparing the plan, the East Witney Strategic Development Area would be likely to result in some harm to the landscape. The Kirkham report recommendations and estimated housing capacity figure sought to minimise the landscape impact of development. However, it does not mean that unacceptable harm to the landscape would inevitably be caused if more than the estimated 250-300 dwellings are accommodated on the site.

135. The plan proposes that around half, or more, of the combined sites would be designated for environmental enhancements and landscape mitigation. Whilst the relevant developer consortium argues that, with less land allocated for these uses, up to 800 dwellings could be satisfactorily accommodated across the two sites, there is not a need for the plan to provide for these additional dwellings at this stage. However, based on the schematic masterplan submitted by the development consortium, having regard to the areas of the two sites indicatively shown for housing development on the policies map and my visits to the sites and their surroundings, I conclude that there is a realistic prospect that the sites **could accommodate the modified plan's** allocation of around 450 dwellings without unacceptable harm to the landscape being caused. In the light of this and the increased overall housing requirement for the district detailed in Issue 1, **MM44**, which increases the indicative housing allocation on the sites from 400 to 450, is necessary for the plan to be positively-prepared.
136. Evidence indicates that for the full allocation of 450 dwellings to be constructed, improvements to the nearby **Shore's Green A40 junction** would be necessary. This improvement scheme would also be of significant wider benefit to Witney. However, as with the North Witney site and the West End Link Road, there is not currently evidence to demonstrate the trigger point (in terms of the number of dwellings constructed on the East Witney sites) at which the junction improvement would be necessary to the acceptability of development in planning terms. Evidence in this regard is likely to come forward through transport assessment work undertaken as part of planning applications. Consequently, in order for the plan to be justified, **MM44** is necessary to delete the statement that the junction improvements are in place before the completion of any housing on the Cogges Triangle part of the SDA. However, given the identified need for the scheme, it would not be appropriate for the policy to only require its provision insofar as can be delivered within the land control of the developer. There is a suggestion that the benefits of the junction improvement could be achieved by other means although, in the absence of convincing evidence to fully demonstrate that this is the case, it is not appropriate for the plan to formally allow for this at this stage.
137. Again in common with the West End Link Road the requirement for a **compulsory purchase order (CPO) to enable construction of the Shore's Green junction works** cannot be ruled out, although neither is it a certainty. A CPO would be likely to somewhat delay **the Council's forecasts of delivery of housing on the sites. However, this does not mean that the Council's forecasts are completely unrealistic or that the allocation is unsound.** I deal in Issue 10 with the implications of this for overall housing supply in the district.

138. In order that the policy is effective and consistent with national policy, **MM44** is also necessary to provide for a comprehensive development led by an agreed masterplan, landscape and public access enhancements, the conservation of heritage assets and archaeological investigation. **The policy's requirement that development should make "appropriate" contributions towards LTP4 transport schemes is sound; it is not feasible at the local plan stage to define more precisely which schemes will be relevant to this requirement at the point of the determination of a planning application, but the word "appropriate" ensures that the development would not be required to make unreasonable contributions.** The requirement for improved pedestrian/cycle connectivity across the River Windrush is also reasonable as this would provide direct access from the western site to the supermarket and employment areas which lie to the south of the town centre.

Policy WIT2a - Woodford Way Car Park

139. In responding to the increased requirement for housing, the Council has proposed that the plan be modified to include an allocation for around 50 dwellings on the Woodford Way Car Park. The site is previously-developed and is in a highly sustainable location, immediately adjacent to Witney town centre but also in an area where there has been a significant amount of recent residential development. The policy provides for some public car parking to be retained as part of the development, which is **appropriate given the site's** location and it is realistic in view of the relatively high density development which is envisaged. Although part of the site is in flood zone 2 this is not good reason not to allocate it for housing, bearing in mind the potential for flood risk problems to be overcome through detailed design and the intention that part of the site would be retained as car parking.

140. The site is owned by the Council and, I understand, is being actively promoted for development, although currently there is no developer "on board". However, I conclude that there is a realistic prospect of the site being developed for around 50 dwellings during the plan period and, as such, the allocation is sound. Consequently, for the plan to be positively-prepared in the light of the increased housing requirement for the district, **MM46** is necessary to include new policy WIT2a providing for this housing allocation and setting out appropriate criteria with which the development should accord.

Policy WIT2b - Land West of Minster Lovell

141. Again as a response to the increased housing requirement, the Council proposed that the plan be modified to include an allocation for around 85 dwellings on a green field site to the west of Minster Lovell. As a relatively modest development in one **of the plan's defined villages**, and in fairly close proximity to Witney, the allocation accords with the overall spatial strategy of limited dispersal of development to settlements other than the main towns. In principle, therefore, the allocation is soundly-based.

142. Nonetheless, the Council has subsequently stated that it made an error in defining the boundary of the site on the proposed policies map and that a somewhat smaller site than that originally shown is what it intended to allocate. The around 85 dwellings capacity indicated in policy WIT2b reflects a planning application which the Council has resolved to permit, subject to a

legal agreement. However, in the light of a subsequent, higher density, application for the same site area for around 125 dwellings, there is no persuasive evidence to indicate that, in principle, 125 homes could not be acceptably accommodated on the reduced-size site.

143. Housing development on the northern part of the site, adjacent to Wenrisc Drive and Whitehall Close, would constitute a relatively modest expansion of the built-up part of the village which extends along Burford Road. However, residential development further south adjacent to Ripley Avenue, as advocated by the site promoter and on the land which the Council states it showed on the policies map as part of the allocation in error, would, in urban form terms, represent a much more substantial addition to the settlement. It is the case that the density and the style of the Ripley Avenue housing has more in common with the Wenrisc Drive/Whitehall Close area than it does with the properties fronting Brize Norton Road. However, its cul-de-sac form, separated from the Wenrisc Drive/Whitehall Close housing by public open space, links it **in urban form terms much more with the 'loose knit' housing** development which extends along Brize Norton Road. Consequently, housing on the land adjacent to, and to the west of, Ripley Avenue would undesirably consolidate these two distinct areas of the village. I conclude that the resulting harm to the existing character of Minster Lovell would not be outweighed by the benefit of the additional homes which could be provided. Therefore, it is appropriate for the plan to be based on the reduced-size site.

144. In conclusion and for the plan to be positively-prepared and justified, **MM47** is necessary to include new policy WIT2b providing for this housing allocation for around 125 dwellings, on the reduced-size site, and setting out appropriate criteria with which the development should accord.

Conclusion

145. In conclusion, subject to the above-mentioned modifications, the plan sets out a soundly-based strategy for the Witney sub-area.

Issue 6 – whether or not the plan sets out a soundly-based strategy for the Carterton sub-area

Policies CA2 and CA3 - Carterton Sub-Area and Town Centre Strategies

146. Policies CA2 and CA3 detail overarching strategies for the Carterton sub-area and for its town centre. The sub-area strategy seeks to focus most new development in/adjacent to Carterton itself, an approach in line with the overall spatial strategy of the plan and which is soundly-based. As detailed below I conclude that the two new Carterton housing allocations and the increased housing provision at the REEMA sites, proposed by the Council during the suspension of the examination, are soundly-based. Consequently, for the plan to be internally consistent, and thus effective, **MM54** which references these allocations and ensures consistency with policy E1 in terms of employment land, is necessary. To ensure consistency with national policy and to be justified, **MM54** also requires development to conserve and enhance the historic environment and details the key supporting infrastructure likely to be necessary in the area.

147. Policy CA2 is a positively-prepared approach to strengthen the role of Carterton town centre and to help it become the local retail centre of choice for those living in and around Carterton. The specific measures which the policy identifies to achieve this are realistic ones and the policy appropriately identifies that contributions from developers towards these measures will be sought. However, for the policy to be effective, **MM53** is required to more specifically detail **requirements in respect of the town's primary and secondary shopping frontages**.
148. Policies CA2 and CA3 have been criticised as lacking ambition for the town and, in particular, it has been argued by some that the A40/B4477 junction improvements (referenced in policy CA3) and the town centre strategy in general are undeliverable without additional allocations for new housing in/adjointing Carterton. I consider the overall role of Carterton in Issues 2 and 3. However, I am not persuaded that the provision of more housing on the edge of the settlement, some distance from the centre of the town (and potentially closer to the A40 than the town centre) would necessarily result in the desired regeneration of Carterton town centre.

Policy CA1 - REEMA North and Central

149. The REEMA sites form part of an area of Ministry of Defence housing which is in the process of being redeveloped. Although the existing housing is part of the **town's** twentieth century heritage, its redevelopment to provide higher quality, modern housing is likely to contribute significantly to the overall regeneration of Carterton. The sites are located within easy walking distance of the town centre and bus routes. The redevelopment is thus, in principle, soundly-based. The plan as originally submitted envisaged a net increase of around 200 dwellings on the Central site but, since then, the Council considers that across the North and Central sites it is realistic that a net addition of 300 dwellings can be delivered through the redevelopment. It has been argued both that this figure is unrealistically high and unambitiously low. However, having regard to the reasonable density of development assumed by the Council, the overall increase of around 300 dwellings is realistic and appropriate. For the plan to be positively-prepared and justified, **MM50** is therefore needed to refer in policy CA1 to the North REEMA site and for the policy to provide for a net increase of **around 300 dwellings across the sites'** redevelopment. This modification also provides necessary clarity about transport infrastructure requirements.
150. Delays to date in the implementation of the redevelopment scheme mean that the plan does not assume that the 300 dwellings will be delivered in the short term, although it is a realistic prospect that they will be constructed during the plan period.

Policy CA1a - Land at Milestone Road

151. This housing allocation, on the edge of the existing residential area, yet located within walking distance of the town centre, has been proposed by the Council as a modification to the plan in order to provide greater certainty in respect of the delivery of new housing. The developer for the site indicates that the emerging scheme is likely to include around 200 dwellings and a care home. This would meet local aspirations for such accommodation in this

location, but it is not necessary for the plan to be sound to identify the site specifically for a care home, given that Policy H4 requires an appropriate balance of residential property on all sites.

152. Whilst land assembly difficulties have been a problem in the past in this location, having regard to the **developer's** comments at the hearing, it is realistic to assume that these will not prevent delivery of housing on the site during the plan period. It also emerged at the hearings that noise pollution is likely to be much less of a concern than previously anticipated, bearing in mind recent changes in the type of aircraft using the nearby Brize Norton airbase. Policy CA1a requires appropriate noise mitigation and, in the light of this, there is a realistic prospect that this can ensure a satisfactory form of development.
153. The allocation is consequently soundly based and, thus, for the plan to be positively-prepared and effective in providing for housing needs, **MM51** is necessary. This includes in the plan policy CA1a, allocating the site for around 200 dwellings and detailing appropriate criteria with which the development should accord.

Policy CA1b - Land at Swinbrook Road

154. This housing allocation has also been proposed by the Council as a modification to the plan to provide greater certainty over the delivery of new housing. Whilst it is on the edge of the existing built-up area of the town, it would adjoin a housing development currently under construction and has been the subject of a previous resolution to grant permission for residential development. I note that it is supported by the Town and Parish Councils and I conclude that, in principle, it is soundly-based. Land assembly issues have also prevented this site from progressing in the past, but based on the discussion at the hearing I conclude that there is a reasonable prospect of these being resolved to enable delivery of around 70 homes during the plan period. Thus, for the plan to be positively-prepared and effective in providing for housing needs, **MM52** is necessary to include in the plan policy CA1b allocating the site for around 70 dwellings and detailing the criteria with which the development should accord.

Conclusion

155. In conclusion, subject to the above-mentioned modifications, the plan sets out a soundly-based strategy for the Carterton sub-area.

Issue 7 – whether or not the plan sets out a soundly-based strategy for the Chipping Norton sub-area

Policy CN2 - Chipping Norton Sub-Area Strategy

156. Policy CN2 sets out the strategy for the Chipping Norton sub-area which, in **line with the plan's overall spatial strategy**, seeks to focus most new development in/adjoining the town of Chipping Norton itself. It has been argued that this approach will result in an inappropriate increase in the size of the town and that it will not adequately support the smaller settlements elsewhere in the sub-area. I deal with points relating specifically to the East Chipping Norton Strategic Development Area below, but this overall approach

aligns with the NPPF's core planning principle (paragraph 17) that significant development should be focussed in locations which are or can be made sustainable. Chipping Norton is, by far, the most sustainable settlement in the sub-area. However, in the light of my conclusions on the SDA (policy CN1) detailed below, a number of modifications to policy CN2 are required (**MM56**) to ensure consistency and, thus, the effectiveness of the plan. I have slightly altered the wording of the modification as consulted on, in respect of the AONB, to be consistent with the wording of national policy.

157. The sub-area also includes Middle Barton, Great Rollright, Over Norton and **Enstone which are defined by the plan's settlement hierarchy** as villages, and which policies OS2 and H2 propose for limited development. The potential suitability of sites in these villages for allocation in the plan was considered through the SHLAA and SHELAA which, as detailed in Issue 4, I have concluded are robust. No sites in these villages were identified as available and suitable for development. However, the plan assumes that in the order of 190 dwellings on windfall sites will come forward in this sub-area and there is no reason in principle why this should not include development according with policies OS2 and H2 in these villages.

Policy CN1 - East Chipping Norton Strategic Development Area (SDA)

158. Policy CN1, as proposed by the Council **to be modified to reflect the district's** increased overall housing requirement, allocates land to the east of Chipping Norton (colloquially known as Tank Farm) for around 1,400 homes. The plan, as originally submitted, proposed 600 dwellings in this location although the modification expands the site to include land to the north of London Road and assumes higher density development and a larger developable area. The Council also proposed provision for 9ha of employment land as part of the SDA, a new on-site primary school and an eastern link road through the site connecting Banbury Road with the B4026/A361.
159. The site is in a sensitive location, close to the boundary of the Cotswolds Area of Outstanding Natural Beauty (AONB) and to the Chipping Norton Conservation Area. As with the North and East Witney SDAs concern is raised about the intention to accommodate 1,400 homes on the Tank Farm site when the *Kirkham Landscape and Visual Review* indicated an estimated housing capacity of 500 dwellings. However, it is again the case that the report makes clear that this capacity recommendation is only an estimate and that final numbers will depend on a number of factors including more detailed assessments and housing needs. It is clear that, in developing a greenfield, countryside site, this development would cause some harm to the landscape, although this is also the case with most of the plan's **housing allocations and** the alternative sites appraised in preparing the plan. The Kirkham report recommendations and estimated housing capacity figure sought to minimise the landscape impact of the development. However, its recommendations do not mean that unacceptable harm to the landscape would inevitably be caused if more than the estimated 500 dwellings are accommodated on the site.
160. Based on detailed assessment and masterplan work (Option 3: Masterplan Study) the consortium of parties promoting development of the site contends that 1,200 dwellings could appropriately be accommodated as part of this SDA, around 840 of which would be located on the, more sensitive, part of the

site south of London Road. Having regard to this masterplan, all that I have read and heard in relation to landscape impact and, importantly, my visits to the site and the surrounding area (including to the various viewpoints suggested to me), I conclude that it is realistic that 1,200 dwellings could be accommodated within this SDA without causing unacceptable harm to the landscape. This conclusion assumes the provision of appropriate landscape mitigation measures as required by policy CN1. However, there is not the evidence to give confidence that 1,400 dwellings, as proposed by the Council in 2016, could be constructed without unacceptable harm being caused. At the hearing the Council agreed that it would be appropriate to further modify the policy to allow for around 1,200 dwellings to be accommodated at this SDA.

161. The plan as now proposed to be modified requires the provision of a north-south through-road across the site, referred to as the eastern link road. This would help to minimise use of roads in the town centre by traffic generated by the development and would provide a route avoiding the town centre for some, but by no means all, other traffic in the town. Doc TRA6 appraised an SDA development of 1,500 dwellings and indicates that, notwithstanding the provision of the eastern link road as part of this development, traffic in the town centre at the end of the plan period would be higher than would be the case without an SDA. However, the report makes clear (paragraph 7.5.11) that all key highway links around the town would continue to operate comfortably within the limits of their theoretical capacity in the AM and PM peak periods. Whilst not specifically tested, it appears to me likely that this would also be the case with a smaller, 1,200 dwelling development as is now proposed by the promoters. However, importantly, the forecast town centre traffic volumes would be lower than with a 600 dwelling SDA and no eastern link road, as proposed in the plan as originally submitted.
162. It is also the case that benefits for the town centre arising from the eastern link road would come at the expense of increases in traffic elsewhere in the town, although it is an almost inevitable consequence of a new road designed to reduce traffic in one location that it will increase it in another. An Air Quality Management Area is already designated in the town centre and, thus, as Doc TRA6 indicates, the SDA would be, all other things being equal, likely to exacerbate air quality problems. To this extent the Sustainability Appraisal **Addendum's** (Doc CD10) suggestion that the expanded SDA and eastern link road would be likely to improve air quality is probably inaccurate, although it would be likely to cause less harm in this respect than the, originally proposed, 600 dwelling development without the link road.
163. However, Doc TRA6 identifies that advancements in vehicle technology may mitigate, to some extent at least, these adverse air quality effects as the plan period progresses. Moreover, technological advancements aside, it is to my mind likely that individuals' choices about where they travel to and by what mode of transport they use will be of fundamental importance in determining the success of attempts to reduce the harmful effects of vehicle use. In this regard it is a core planning principle of the NPPF (paragraph 17) to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling. The East Chipping Norton SDA would be within **reasonable walking and cycling distance of the centre of the district's second** most sustainable settlement and, thus, offers significant potential for its residents to access jobs and services by means other than the private car.

Locating the housing in less sustainable locations elsewhere would minimise immediate adverse impacts on the Chipping Norton town centre Air Quality Management Area. However, in doing so, it would be likely to result in more and longer vehicle trips by residents accessing jobs and services, itself causing adverse environmental impacts. Consequently, I conclude that the discrepancy in the SA conclusions mentioned above is not a fatal flaw, nor does it significantly undermine the case for the East Chipping Norton SDA.

164. A compulsory purchase order (CPO) may be necessary to enable full construction of the road and thus enable the SDA to be built in its entirety. This would have the potential to delay delivery of housing at this site beyond the forecasts of the promoter and Council. However, even if a CPO were to be required, there is a realistic prospect that a significant proportion of the 1,200 dwellings will be delivered during the plan period. Consequently, the possibility of the need for a CPO does not mean that the allocation is unsound.
165. A range of other concerns have been raised about the East Chipping Norton development including heritage impacts, archaeology, water supply and effects on dark skies. Whilst they are all of importance, it seems to me likely that they can be appropriately addressed and satisfactorily resolved at the planning application stage and policy CN1 includes relevant criteria to ensure this, although **MM55** is necessary in terms of archaeology and dark skies.
166. Having regard to the desirability of meeting the identified housing needs in the district, I therefore conclude that for the plan to be positively-prepared **MM55** and **MM56** are necessary, increasing the number of dwellings to be provided at the East Chipping Norton SDA to around 1,200 and appropriately revising/updating the related education/transport provision requirements and requiring the replacement of any allotments lost as part of the development.
167. Evidence indicates that it is likely that the SDA would give rise to the need for additional health centre facilities in the locality and, thus, for the plan to be justified **MM55** includes a requirement in this respect. However, whilst expansion of the existing health centre on immediately adjacent land within the SDA boundary may well be a suitable way of addressing these needs, there is not the evidence to indicate that it is the only appropriate or feasible way of providing the necessary health centre facilities. Consequently, it is not necessary for soundness for the plan to designate a specific location/piece of land for the health centre facilities.
168. As proposed to be modified, and in line with policy E1, the SDA provides for around 5ha of land for business uses to the north of London Road. Whilst the evidence (*Economic Snapshot*) identifies a need for only 3ha of additional employment land in Chipping Norton, it is argued that a single 5ha location **would provide a "critical mass" and allow for occupation by large format** employers. There is little to suggest that this is not a sound approach and although a compulsory purchase order may be required to deliver this element of the SDA, this does not make the allocation unsound. Ultimately, delivery of the housing element of the Tank Farm development is not dependent on the employment element. Consequently, for the plan to be positively-prepared the part of **MM55** which provides for the 5ha of land for business uses is also necessary.

Conclusion

169. In conclusion, subject to the above-mentioned modifications, the plan sets out a soundly-based strategy for the Chipping Norton sub-area.

Issue 8 – whether or not the plan sets out a soundly-based strategy for the Eynsham – Woodstock sub-area

Policy EW2 - Eynsham – Woodstock Sub-Area Strategy

170. Policy EW2 sets out an overarching strategy for the Eynsham – Woodstock sub-area and, amongst others things, appropriately emphasises the need to alleviate traffic congestion on the A40 and the impact of traffic in Woodstock. As proposed by the Council to be modified the policy sets out strategic and non-strategic housing allocations which I consider in detail below. However, for the policy to be justified and to accord with the settlement hierarchy which, as detailed in Issue 3, is to be modified to reinstate Long Hanborough as a Rural Service Centre, **MM66** is necessary to identify that, in common with the other Rural Service Centres, Long Hanborough will be a focus of new development.

171. **Concern has been raised that, in terms of the plan's actual housing allocations,** there is too much focus on Eynsham and Woodstock and not enough on Long Hanborough. However, sites have been allocated in the plan on the basis of those deemed available and suitable through the site selection process which, as detailed in Issue 4, I have found to be robust. Moreover, it is envisaged that 290 or so dwellings will come forward on windfall sites in this sub-area and there is no reason in principle why these should not include sites in Long Hanborough. It is the case that, unlike Woodstock and Eynsham, Long Hanborough has a station. Whilst this places the settlement well for longer distance travel on the national rail network, for most of the day there is only an hourly service to Oxford. In comparison, existing, high quality bus services at Eynsham and Woodstock offer much more frequent links to jobs and services in Oxford. Consequently, I am not persuaded that Long Hanborough warrants higher status in the settlement hierarchy than Eynsham or Woodstock.

Policy EW1a – Oxfordshire Cotswolds Garden Village Strategic Location for Growth

172. As detailed in Issues 1 and 3 it is a soundly-based approach for the plan to provide for 2,750 dwellings to meet a proportion of the housing needs of Oxford, which are unlikely to be able to be accommodated in the city itself, and for this housing to be located as close as possible to Oxford in the Eynsham – Woodstock sub-area. The LUC *Oxford Spatial Options Assessment* report identified land to the north of the A40, near Eynsham, as one of the two most appropriate sites **to meet Oxford's** housing needs in the district. In the light of this the Council has proposed modification of the plan to include policy EW1a which allocates land to the north of the A40 near Eynsham for around 2,200 homes. To contribute towards the requirement for additional employment land (see Issue 2), and in line with the recommendations of the *Economic Snapshot* report, the allocation also provides for about 40ha of land for a campus-style science park. The plan envisages that the site would be developed in accordance with garden village principles and it has been **accepted as part of the Government's garden village programme,** which offers

resources to assist in its development. However, in recognition of the fact that appraisal and development of the village is in its relatively early stages, policy EW1a makes clear that its development will be led by a forthcoming Area Action Plan (AAP).

173. It is clear that there are a considerable number of potential constraints to development of the site. The most significant of these include transport (in particular congestion on the A40), air quality, noise arising from the A40, minerals safeguarding, the on-site presence of an aggregate recycling facility, landscape effects, flood risk, biodiversity (including in respect of the City Farm) and heritage assets, in particular the Medieval Farm at Tilgarsley. Based **on what I've read, heard and seen, these are not necessarily (individually or cumulatively) incompatible with housing and employment development on the site.** However, they may restrict the number of dwellings which can appropriately be accommodated, particularly given the intention that the site is developed as a garden village. Nonetheless, I conclude that there is a reasonable prospect that this location could make a significant contribution towards the 2,750 homes the plan is committed to providing by the end of the plan period in respect of Oxford City's needs.
174. There is much debate about the extent to which the garden village should and would be a distinct settlement, separate from Eynsham which lies immediately to the south, but on the other side of the A40 dual carriageway. A settlement of several thousand homes and with a science park campus would inevitably be able to provide for many day to day needs of its residents. However, it is unlikely to be able to provide them all and residents of the garden village would need to travel outside of the settlement for some services, some of which might exist in Eynsham. This will be an important matter for the Area Action Plan to address and it is clearly important that the garden village is planned having very careful regard to the existence of, and implications for, neighbouring Eynsham. However, this does not necessarily mean the garden village could not or should not be designed as a distinct settlement.
175. All in all, and having regard to the identified housing needs of the housing market area, I conclude that the land to the north of Eynsham is soundly-based as a location for growth to meet a proportion of Oxford City's housing needs. However, there is currently insufficient evidence to formally allocate the land as a strategic housing site for around 2,200 homes and to do so could **inappropriately fetter the forthcoming Area Action Plan's** (AAP) ability to provide for a high quality comprehensive development. Consequently, for the plan to be positively-prepared, justified and effective, **MM57** is necessary. This identifies the area as a location for housing and employment growth likely to make a significant contribution towards Oxford City's **unmet housing needs**, makes clear that its comprehensive development should accord with a forthcoming AAP and indicates the key issues to be addressed in that development plan document. In the light of this it is also necessary for the boundary of the site to be shown on the policies map as indicative.
176. **The Council's and developer's forecasts of delivery of houses at the garden village** are to my mind very optimistic ones, although not completely unrealistic and I consider the implications of this for housing supply in Issue 10. Nonetheless, based on all that I have read and heard, I conclude that

there is a reasonable prospect of a significant number of dwellings being constructed during the plan period at this location for growth.

Policy EW1b - West Eynsham Strategic Development Area

177. In response to the increased housing requirement figure for West Oxfordshire **and the district's commitment to provide for a proportion of Oxford City's** housing needs, the Council has proposed a modification to the plan (policy EW1b) to also allocate land to the west of Eynsham as a strategic development area for about 1,000 homes.
178. The development would require a north – south link road through the site although, in the light of the discussion at the hearings, it is appropriate for this to be designed so as not to encourage through traffic. It is also necessary for **the road's alignment to avoid impact on the scheduled ancient monument near** the southern boundary of the site, although the statement of common ground between the Council and Historic England suggests that this is feasible. **MM58**, which addresses these matters, is therefore necessary for the policy to be justified and effective. I have revised the wording of this modification from that consulted on in the interests of effectiveness and in the light of comments by Historic England.
179. Given its close proximity to the location of the garden village there is an argument that the West Eynsham SDA should also be the subject of the forthcoming Area Action Plan. Whilst there could be some benefit in this, I conclude that it is not necessary to the soundness of the allocation and it would also have the potential to delay the delivery of housing at West Eynsham. Nonetheless, the presence and emerging detailed design of the West Eynsham development will need to be an important influence on the Area Action Plan for the garden village.
180. Planning permissions are already in place for more than 200 dwellings which would form part of the overall SDA and it is realistic to assume that these will be constructed within the next few years. Forecasts for delivery of the rest of the housing are, to my mind, optimistic but not entirely unrealistic. The overall supply of housing land is addressed in Issue 10, but the potential for slippage in the forecast delivery programme does not render the allocation unsound. Consequently, for the plan to be positively-prepared and justified, having regard to identified housing needs, **MM58** is necessary to allocate land to the west of Eynsham as a strategic development area for around 1,000 dwellings and to include appropriate requirements with which the development should accord.

Cumulative effects of development at/near Eynsham

181. Having regard to the garden village and West Eynsham SDA there is concern at the overall amount of housing development proposed at and near to Eynsham. The resulting loss of countryside, which I appreciate is valued by many local residents, is to my mind regrettable. However, in West Oxfordshire where there are very limited opportunities for housing development on previously-developed land, the loss of countryside to development is an almost inevitable implication of government policy (clearly expressed in the NPPF) that there is a presumption in favour of objectively assessed needs for development being provided for in local plans.

182. I recognise that it is also inevitable that the amount of development proposed **at and near to Eynsham would alter the village's character**. However, whilst this will not be welcomed by some residents, a change in character is not, in itself, necessarily harmful and there would be likely to be some benefits to existing residents arising from the expansion of the settlement. Whilst I have had regard to it, I have given only limited weight to the emerging Neighbourhood Plan for Eynsham given that it is significantly behind the Local Plan in its preparation and adoption.
183. The transport implications of the new housing is an understandable concern, particularly given that the nearby A40 is already congested. Detailed transport evidence (doc TRA5) indicates that the development proposed in the plan at Eynsham and elsewhere along the A40 corridor would be likely to exacerbate the congestion problems. However, it is also likely that the proposed park and ride site at Eynsham and bus priority measures along the A40 (Oxford Science Transit), for which funding has been secured, will to some extent mitigate the worsening of the problems. Overall there is not evidence to clearly and convincingly demonstrate that the residual transport impacts would be severe.
184. Moreover, it appears to me, that for people travelling to Oxford for work or to access other services, the Eynsham area offers the best location in West Oxfordshire to do so by means other than the private car. If the new housing proposed for the Eynsham area were to be located elsewhere it would be likely to result in more and longer journeys by car. Also, if it were to be elsewhere on the A40 corridor it would be likely to cause the same, or worse, problems of congestion between Eynsham and Oxford than would be the case with the plan as is proposed. In the light of this, I conclude that the judgement of the Council and County Council that the traffic implications of development proposed at Eynsham are outweighed by the benefits of providing for identified housing needs, is a soundly-based one.

Policy EW1f - Land at Myrtle Farm, Long Hanborough

185. Policy EW1f has been proposed by the Council as a modification to the plan in the light of the increased housing requirement and to provide greater certainty about the delivery of new dwellings. The policy allocates land at Myrtle Farm, close to the main facilities of Long Hanborough, for around 50 homes. The site is visible from the north-east from various points in the valley of the River Evenlode and the westernmost parts of the Blenheim Palace Park. However, the housing would be substantially obscured from view from these locations by existing landscaping, planted since a previous Inspector raised concern about housing development on the site more than 20 years ago. Moreover, the extent to which the housing would be seen would be likely to reduce even more so in the future as this vegetation further matures. Even at the outset, new housing on this site would be far less visible than the ribbon of existing housing at Long Hanborough which looks out over the valley. In this context, no significant landscape harm would result from the proposed development.
186. The Parish Council raises concern about limited school capacity in the area. **The situation is clearly 'tight' but at the hearings the County Council** persuasively argued that no significant problems in this respect would be likely to result from development of the site for around 50 houses, bearing in mind the other housing committed/proposed for allocation nearby.

187. **As a result of a 'change of heart' by the landowner**, the deliverability of the site has been called into question. However, the situation could change again during the remainder of the plan period and I conclude that the **site's location** close to the main facilities of a Rural Service Centre, justifies its allocation in the plan, notwithstanding any doubts about its delivery for housing. Should the **site not be developed during the plan period the 'loss'** of 50 homes (0.3% of the total plan period housing requirement) would not materially threaten **delivery of the plan's housing strategy**.

188. Consequently, to assist in contributing towards meeting housing needs and, thus, for the plan to be positively-prepared **MM62** is necessary, allocating this site for housing development and setting out appropriate requirements with which the development should accord.

Policy EW1g - Oliver's Garage, Long Hanborough

189. Policy EW1g has also been proposed by the Council as a modification to the plan, in the light of the increased housing requirement and to provide greater certainty about the delivery of new homes. The policy allocates the previously-developed **Oliver's Garage site for around 25 homes** and sets out appropriate **requirements for the development. The site is close to Long Hanborough's** main services and there is nothing persuasive to indicate that the allocation is not soundly-based in principle or that it will not be developed in full during the plan period. Consequently, for the plan to be positively-prepared **MM63** is necessary, allocating this site for housing development and detailing soundly-based requirements for it.

Policy EW1h - Former Stanton Harcourt Airfield

190. Policy EW1h is another policy which has been proposed by the Council as a modification to the plan in view of the increased housing requirements and to provide greater certainty about the delivery of new housing. The policy identifies this previously-developed site on the edge of Stanton Harcourt as suitable for around 50 dwellings. Stanton Harcourt is designated as a village in **the plan's settlement hierarchy and**, notwithstanding that it would not be well-served by public transport, the **allocation accords with the "limited development" which policy OS2 identifies for villages**. Moreover, I consider **that the site's limitations in terms of public transport accessibility are** outweighed by its use of previously-developed land. The site is close to the Stanton Harcourt Conservation Area. However, I understand that a recently approved planning application for the development identified that it would be likely to cause only limited harm to this heritage asset and that this harm would be outweighed by the benefits of the provision of housing, including affordable homes. I have no reason to question this judgement.

191. Particular concern, supported by detailed evidence, has been raised by the Parish Council about the impact of the neighbouring landfill operation, including in the long term, on potential residents of the site. Policy EW1h specifically requires development to incorporate appropriate mitigation measures in this regard and I understand that neither the Environment **Agency nor the Council's Pollution Control Officer objected** to the recent planning application. If the extant permission were not to be implemented (and there is no reason to believe that is likely) I am satisfied that this

important issue could be adequately and appropriately addressed through the detailed design of, and conditions attached to the, planning permission for any subsequent housing proposal for the site.

192. I conclude, therefore, that this allocation is soundly-based and there is also a strong likelihood of the site being constructed in its entirety within the next few years. Consequently, for the plan to be positively-prepared and justified **MM64** is necessary, to allocate the site for a housing development of around 50 dwellings and to detail the appropriate requirements with which the development should accord.

Policy EW1 - Blenheim World Heritage Site

193. Policy EW1 is, in principle, a positively-prepared approach to securing the conservation and enhancement of the Blenheim World Heritage Site. However, to ensure consistency with national policy and accordance with policy EH7, the detailed wording revisions of **MM65** are necessary for the policy to be sound.

Housing Allocations at Woodstock

194. In response to the increased housing requirement for the district as a whole and to provide greater certainty about the delivery of housing, the Council proposed modifications to the plan, as originally submitted for examination, to allocate three sites in Woodstock for new housing. Concern was raised about these sites in respect of their proximity to the Blenheim World Heritage Site (WHS) and, in particular, the lack of up to date and specific assessments of **the allocations' likely impact on the WHS and its setting**. In response the Council commissioned independent detailed impact assessment work (*West Oxfordshire Local Plan Allocations Landscape and Heritage Advice Report*, October 2017). The report does not raise fundamental concern about any of the allocations in landscape or heritage terms, albeit that it makes some specific recommendations concerning the precise amount of housing, its location on the sites and mitigation measures. I consider in detail below each of the individual sites, although overall I am satisfied that the report is proportionate evidence for the allocation of sites in a local plan and I am not persuaded that it contains any intentional or unintentional bias in favour of the allocations already proposed in the plan.

195. A number of aspects of the report have been criticised in some detail, in particular that it does not make clear exactly how much development can cumulatively be accommodated in the area without significantly eroding the **rural character of the WHS's setting**. However, I do not see that an answer to this question is a pre-requisite to determining the extent of harm the allocations actually proposed in the plan would individually and cumulatively be likely to cause to the setting of the WHS. The *Settings Study* (Doc ENV15 Appendix III) identifies that in much of the area surrounding the WHS incremental development (eg up to 9 houses) could generally be accommodated. However, I do not interpret this as meaning that the author(s) of this study had concluded that larger scale housing development on the sites proposed for allocation for housing in the plan, would be definitively inappropriate. Indeed, based on my reading of the 'Objectives' section of the document, the report itself was not intended to identify what development would and would not be appropriate. Nonetheless, crucially, the study provides

clear guidelines on how the likely impact of proposed development should be assessed and it appears to me that the approach adopted in the preparation of the *Landscape and Heritage Advice* report is consistent with this.

196. Having regard to the *Landscape and Heritage Advice* report the *Sustainability Appraisal Further Addendum* (Doc CD12) identified that it is possible, although not certain, that a major negative effect on heritage assets could result from development of the Land North of Banbury Road site. However, having regard to the **Council's intention to now reduce the number of dwellings** on this site from 250 to 180 (which is notably even lower than the 220 advocated by the *Landscape and Heritage Advice*), the February 2018 SA report (Doc CD17) notes the potential for the heritage assets effect to be reduced to a minor negative one. During the examination I spent much time viewing these sites, including from many vantage points within the World Heritage Site and its setting, and I conclude that the assessment of the likely effects of the proposed housing developments set out in the *Landscape and Heritage Advice* and the SA documents are very cautious ones.
197. In the light of this I do not accept the argument that the presence of the WHS or other heritage assets in the vicinity means that there should not be housing allocations at Woodstock. Whilst the NPPF makes clear that great weight should be given to the conservation of heritage assets, it does not identify that this means there should be a presumption against development in their vicinity. Importantly, it is also the case that Historic England does not object to the principle of housing on these sites or, indeed, to the criteria included in the relevant site allocations policies as proposed to be modified.
198. **Moreover, Woodstock is designated by the plan's settlement hierarchy as a Rural Service Centre** and is shown by the November 2016 *Settlement Sustainability Report* to be the fifth most sustainable settlement in the district. The town has a good range of shops and other services and also frequent high quality bus services to Oxford along with public transport links to Charlbury, Chipping Norton, Witney and the west of the district. Consequently, having **regard to the NPPF's objective (paragraph 17) of focusing development in locations which are sustainable**, the town is, in principle, a suitable location for housing allocations.
199. The Woodstock housing allocations would result in the loss of countryside which would be regrettable although, as I have indicated in relation to other plan allocations, this is an almost inevitable consequence of the aim of national policy that identified housing needs are met through local plans, in a district which has very limited opportunities for housing on previously-developed land. Concern is also raised about the traffic and town centre parking implications of this housing. However, the *Evaluation of Transport Impacts* report does not identify specific traffic problems in Woodstock and nor have I seen detailed and convincing evidence to the contrary. It is true that parking provision in the centre of Woodstock is limited but all of the allocations are within a reasonable walking distance of the town centre. At the hearings the County Council argued in detail and persuasively that school capacity in the area would not be unacceptably stretched by the additional housing proposed.

200. I note that allocations for housing near Woodstock, but within the Cherwell District Council area, are included in the partial review of that Council's previously-adopted 2011-2031 local plan. However, bearing in mind that the Cherwell plan is at a much earlier stage of examination than West Oxfordshire's plan, this is not justification to find the West Oxfordshire allocations unsound.

Policy EW1c – Land East of Woodstock

201. This site would extend the built-up area of the town to the south-east. The *Landscape and Heritage Advice* report identifies that development in this location would have the potential to affect the setting of (i) the Blenheim Palace WHS and Registered Historic Park and Garden, (ii) the listed Cowyard buildings and (iii) the Blenheim Villa Scheduled Monument. In respect of the last I agree with its conclusion that the impact of the development on the villa's significance would be limited because of the small contribution the monument's setting has to its overall significance.

202. Development of the site for housing would clearly alter the rural wider setting of the Cowyard buildings and the WHS and Park and Garden, particularly as seen from the A44. However, existing vegetation along the boundary of the site with the road would limit the harmful effect and this harm could be reduced further by supplementary landscaping. Whilst the report recommends that the site should accommodate a reduced figure of around 270 dwellings, I note that the Council has previously resolved to grant permission for a scheme for 300 dwellings on the site and I have seen no detailed, persuasive evidence to indicate that this scheme would result in unacceptable harm to the landscape or heritage assets. Moreover, I note that Historic England has no objection to the plan's allocation of the site for around 300 dwellings even in the light of the most recent evidence. However, having regard to the landscape/heritage evidence the Council has appropriately proposed a number of further modifications to policy EW1c to avoid unacceptable harmful effects. Based on all that I have read and heard and seen on my visits to the site and surrounding area, including the WHS, I conclude that a housing development of around 300 dwellings on this site, with appropriate mitigation measures, would be likely to cause, at most, only limited harm to the setting of nearby heritage assets and the character and appearance of the area more generally.

Policy EW1d – Land North of Hill Rise

203. This allocation would effectively be an expansion of the established residential areas of Hill Rise and Vermont Drive. As with the East of Woodstock site, it would, to some degree, represent encroachment into the rural setting of the Blenheim WHS and the Registered Park and Gardens. However, the harmful effect resulting from this would be limited by the fact that the site is screened from these heritage assets, including by existing housing. The *Landscape and Heritage Advice* report does not suggest that providing for around 120 dwellings on the site would be inappropriate but I concur with its conclusions that, in order to minimise any harmful effects on the setting of the nearby heritage assets, dwellings should be restricted in height and focussed on the southern part of the site, closest to the existing housing. The further modifications proposed by the Council to policy EW1d provide this.

204. In the light of this, noting that Historic England does not object to the allocation and based on my observations on my walks across the site and around the surrounding area, I conclude that the development of the site would also be likely to cause, at most, only limited harm to the setting of the heritage assets in the area.

205. **The site incorporates an existing children's play area and public open space** but policy EW1d requires their replacement/enhancement as part of the development. No harm in this respect would therefore be likely.

Policy EW1- Land North of Banbury Road

206. Although this site is the furthest of the three Woodstock allocations from the WHS and Registered Park and Gardens, the topography means that it would be the most visible from these heritage assets, in particular its north-western part. **All the site lies within the 'notable view cone' from the Column of Victory** in the park, identified in the *WHS Management Plan*. However, having viewed the site from the Column of Victory and vice versa, I agree with the *Landscape and Heritage Advice report's conclusions that standard height housing on the south western and eastern parts of the site would be unlikely to materially affect this view*. In contrast, it is likely that there would be inter-visibility between any housing on the north western part of the site and the Column of Victory. In the light of the Advice report the Council has proposed further modification to policy EW1e to ensure that housing is focussed away from the western part of the site and to restrict its overall capacity to around 180 dwellings, even lower **than the report's suggested figure of 220**. This is an appropriately cautious approach, given the importance of ensuring that development of the site would minimize any possible harm to the setting of the WHS/Registered Park and Gardens. **The policy wording of "around 180 dwellings" would** not definitively rule out a proposal for more dwellings if it could be convincingly demonstrated that this would not cause significant harm.

207. Housing development on the south-western and eastern parts of the site would be within the setting of the groups of listed farm buildings at 7 and 21-23 Banbury Road. In view of this it is appropriate that the modified policy requires development to take account of, and minimise the effect on, these heritage assets. As such I consider it is reasonable to conclude that it is feasible to develop the site for housing without more than limited harm being caused to the significance of these particular heritage assets.

208. The site is around 700m from the existing bus services on Oxford Street. Whilst further than is ideal, it is a distance I consider many people would be able and willing to walk. Indeed, the frequency and quality of the bus services at Oxford Street would, in terms of the likelihood of residents of the site using public transport, balance out the walking distance required to reach them. In terms of vehicular traffic the routes from the site to the A44 are constrained by width. However, whilst some drivers would no doubt wish to access the A44 at the centre of Woodstock, there exists an alternative route away from the area via Banbury Road towards the A4260. With this in mind, and at a capacity of 180 dwellings, it seems to me unlikely that unacceptable transport impacts **would result from the site's development for housing**.

Conclusion on Housing Allocations at Woodstock

209. I conclude that, subject to the further modifications proposed to the relevant policies, each of the Woodstock housing allocations would be likely to cause, at most, only limited harm to the landscape and to the setting of heritage assets in the area. Moreover, having regard to the ***Landscape and Heritage Advice report's specific consideration of the matter, I conclude that***, cumulatively, development of these housing allocations would not cause substantial harm to these heritage assets or the landscape. NPPF (Para 132) makes clear that where development would be likely to cause less than substantial harm to a heritage asset the development will require clear and convincing justification.
210. There is an identified need for 15,950 new dwellings in the district (including **in respect of Oxford City's unmet needs**). **Although it would be possible to** provide for this without any new housing at Woodstock, the town is an identified Rural Service Centre with a good range of local facilities and excellent public transport links with Oxford. In my judgement the benefit of providing for around 600 dwellings (less than **4% of the plan's overall housing requirement**) in this sustainable location represents clear and convincing justification for the proposed housing development, bearing in mind the importance of the nearby heritage assets and the level of harm which would be likely to be caused to them.
211. Consequently for the plan to be positively-prepared **MM59, MM60 and MM61** are necessary. These modify the plan to include policies EW1c, EW1d and EW1e which allocate for housing, subject to appropriate criteria and requirements, the following sites: Land East of Woodstock (around 300 homes), Land north of Hill Rise (around 120 homes) and Land North of Banbury Road (around 180 homes). I am satisfied that the **"landscape dominated design"** and **"protect the rural setting of the WHS"** wording of these policies is sound. It would not require the use of judgement materially more than would the suggested alternative wording and it reflects the language of the ***Landscape and Heritage Advice***, the recommendations of which are, in the most part, key to my conclusion that the allocations are acceptable. Furthermore, I do not see this wording as fundamentally in conflict with the allocation of these sites for housing; it is the rural setting of the WHS which is to be protected and this does not, as a matter of principle, rule out housing development within the setting.
212. **The policies' requirement that air quality/hydrological impacts on Blenheim Park SSSI** are assessed by developers is sound and aligns with Natural **England's** suggestion in December 2016. In the context of there being no evidence to indicate that housing development on the sites would cause harm in these particular respects, and since any such impact would be likely to vary according to the precise details of the proposed development, it is not necessary or appropriate for such assessments to have been carried out at this stage. Should it be shown that unacceptable harm in these respects would be likely to be caused by housing proposals which come forward they could be refused under the provisions of policy EH2 and/or policy EH6.

Conclusion

213. In conclusion, subject to the above-mentioned modifications, the plan sets out a soundly-based strategy for the Eynsham - Woodstock sub-area.

Issue 9 – whether or not the plan sets out a soundly-based strategy for the Burford – Charlbury sub-area

214. The majority of the Burford – Charlbury sub-area forms part of the Cotswolds Area of Outstanding Natural Beauty (AONB). Policy BC1 sets out the overall strategy for development of the area, appropriately addressing, amongst other things, conservation of the AONB and heritage assets and the retention/development of local services and community facilities. As submitted for examination the policy provided for the delivery of around 800 new dwellings in this area, primarily reflecting existing completions, commitments and an estimate of future windfalls at that time.

215. Following the suspension of the examination, and in response to the increase in the district-wide housing requirement figure, the Council proposed (2016) the allocation in the plan of four housing sites in the sub-area at Burford, Charlbury, Stonesfield and Shipton under Wychwood. Together with completions, existing commitments and likely future windfall developments, these allocations would have provided for around 1,200 new dwellings in the sub-area during the plan period.

216. The *National Planning Policy Framework* makes clear that great weight is to be given to conserving landscape and scenic beauty in AONBs and the designation is specifically identified by the NPPF as a constraint which, in effect, may mean that identified housing needs cannot be appropriately met in full. The NPPF also states that proposals for major development within an AONB should be refused other than in exceptional circumstances. There is not a definition of major development and it is to my mind the case that each of the housing allocations listed above might or might not constitute major development dependent upon their precise design, layout and likely impact.

217. However, equally there is not a national policy embargo on new housing in AONBs; the AONB in West Oxfordshire already has a significant population and it is generally common ground that some new housing in the area is appropriate to ensure its communities thrive and remain sustainable in the long term. There is also evidence that there are specific affordable housing needs in the AONB and I recognise that the most feasible way of delivering these may be, in some circumstances, as part of market housing schemes of moderate size.

218. In response to discussion at the Stage 2 and 3 hearings the Council commissioned evidence (the Peter Brett report) on housing and demography in the Burford – Charlbury sub-area. **This identifies a “broadly indicative minimum housing need” for the area of 834 dwellings for the 2015-31 period and states that if 1,060 new homes were built and occupied in this period the area’s population would grow by around 1,800 people and its labour force by around 8%. Whilst this is useful evidence as a starting point, it merely indicates the likely implications of various levels of housing growth for the sub-area’s population and resident labour force. Neither it nor any other substantive evidence before the examination identifies a housing requirement**

figure for the Burford – Charlbury sub-area which appropriately reflects needs, constraints, relevant national policy and the key issues for development and transport detailed in the *Cotswolds AONB Management Plan* (2013-2018).

219. Completions and existing commitments in the Burford – Charlbury sub-area amount to 774 dwellings. Taken together with completions and anticipated future supply in the rest of the district, the total supply is 15,799 – 99% of the plan period district-wide housing requirement figure. Consequently, there is little case for the plan to provide for more than the already completed/committed 774 dwellings in the Burford – Charlbury sub-area (either the site allocations or a reliance on future windfalls) simply to ensure that the district-wide housing needs are met. Moreover, in the absence of a specific housing need figure for the sub-area, it is not possible to identify that new dwellings, over and above existing completions and commitments, are as a matter of principle, necessary specifically in the context of the AONB or the Burford – Charlbury sub-area.
220. This does not mean that development of further new housing in the Burford – Charlbury sub-areas would necessarily be inappropriate. Specific proposals (whether or not they are major development in the context of paragraph 116 of the NPPF) may well demonstrate overall benefits to the AONB and its communities and consistency with national policy and other relevant plan policies for development in this designated area. Moreover, whilst it relates to matters which are substantially ones of planning judgement, I note that the Chris Blandford Associates' *Landscape and Heritage Advice* concludes that, in terms of landscape and heritage at least, the four sites proposed by the Council for housing allocations in the AONB are potentially suitable for development.
221. On the other hand Oxfordshire County Council has raised significant concerns, in terms of education or accessibility by public transport, about three of the proposed allocations. It would clearly not be ideal for children living in a new housing development in a settlement with a primary school to have to travel some distance outside of the settlement to attend a school with sufficient space for them; nor is it ideal for new housing to be located in a village where public transport services are very limited. This does not mean that permission for housing on these sites should definitively not be permitted. However, in determining whether or not such development is acceptable in principle, it is clearly important for the harm likely to result from these matters, bearing in mind any mitigation proposed, to be weighed against the benefits of the specific proposal.
222. I recognise that to provide a degree of planning certainty it is desirable for a local plan to allocate sites for housing wherever possible. However, in the absence of a housing need figure for the Burford – Charlbury sub-area and in the particular housing land supply circumstances of West Oxfordshire as a whole at the present time, I conclude that soundly-based decisions on the balance of the benefits and harms of further housing development in this area can only reasonably be reached based on the detailed evidence submitted as part of specific planning applications.
223. Consequently, the allocation in the plan of housing sites, and the reliance on additional windfall housing development, in the Burford – Charlbury area, over and above existing completions and commitments, would not be sound. To

address this **MM69** is necessary to identify an indicative housing delivery figure for the sub- area of 774 dwellings (ie current completions and commitments). However, importantly the modification makes clear that the 774 figure is not a definitive cap on housing development in this sub-area, it indicates that Burford and Charlbury are suitable for modest levels of development and it **slightly rewords a number of the policy's other criteria**. **The policy's statement that**, beyond Burford and Charlbury, development will be steered towards the **larger villages is entirely consistent with the plan's** overall aim of locating housing close to local services.

224. In the light of this **MM67 and MM68** are also necessary to explain in the supporting text how proposals for housing development in this sub-area will be assessed, bearing in mind that other plan policies are also of relevance to development in the AONB, including OS2, H1, H2 and EH1a. In the light of consultation comments I have revised this text to improve clarity, avoid duplication and ensure consistency with the rest of the plan. So revised, I am satisfied that there is no material inconsistency between policies OS2, H1, H2, EH1a and BC1 and it is not necessary for the policies and the supporting text to repeat all elements of each other. Moreover, whilst suggestions have been made that policy BC1 should be, in a number of ways, more specific (both more and less restrictive) this is not necessary to the soundness of the plan. Indeed, the policy as worded in line with the recommended modification provides appropriate flexibility. The policy and its supporting text are appropriate to the specific context of the AONB in West Oxfordshire (where, unlike in some districts, there is significant opportunity for general development needs to be met outside the AONB), it does not conflict with national policy and would, together with the other relevant policies, allow development which demonstrates overall benefits to the AONB to come forward.

Conclusion

225. In conclusion, subject to the above-mentioned modifications, the plan sets out a soundly-based-strategy for the Burford – Charlbury sub-area.

Issue 10 – whether or not it is likely that the plan will provide for delivery of the 2011 – 2031 housing requirement and a rolling five year supply of deliverable sites for housing

Supply of housing land for the plan period

226. The housing allocations and strategic location for growth set out in the plan (as proposed to be modified), together with dwellings already completed, extant permissions and conservative and compelling assumptions about 'windfall' housing development provide for 15,799 dwellings. This is 99% of the plan period requirement figure. The NPPF does not require that a plan allocates specific sites to meet the housing requirement for the full plan period. There is a statutory requirement for the plan to be reviewed at least twice before its 2031 end date and these reviews will provide the opportunity for more provision for housing to be included in the plan if necessary. In any case, it is entirely feasible that the full plan period housing requirement of 15,950 could be delivered through slightly higher than indicated numbers of dwellings on allocated sites and/or through more windfall developments than

assumed. Reviews of the plan also provide the appropriate mechanism for responding to any shortfall in housing provision should a site become undeliverable or be significantly delayed. Consequently, there is not a need to identify reserve sites.

Five year housing requirement and supply of deliverable land

227. At the Stage 2 hearings the Council contended that there is not a record of persistent under delivery of housing in the district and that, thus, in line with the NPPF, only a 5% buffer need be applied to the housing land supply calculations for the next five years. It also states that it is not possible to address in its entirety the shortfall in housing provision from the start of the plan period to now in the next five years (**the "Sedgefield" approach**). It **therefore argues that the "Liverpool" approach** should be applied with this shortfall being made up over the whole of the remainder of the plan period. On this basis the housing requirement for the 2017/18 – 2021/22 period would be 4,496 dwellings. The Council contends that the deliverable supply of housing for this period is 5,258 dwellings and, thus, it could identify a 5.8 years supply of housing.

228. In terms of past delivery, in the years from 2006/07 to 2010/11 the number of dwellings constructed significantly exceeded the, then applicable, 365 dpa annual average housing requirement figure for the district of the South East Plan. However, more recently in the first six years of the current plan period (2011/12 – 2016/17) average new housing construction at around 330 dpa has been only half the 660 dpa requirement figure set out in policy H1. Moreover, whilst the 711 dwellings which the Council anticipates will be **completed in 2017/18 would meet the "base" average annual requirement of 660 dpa**, it would not **fully meet this year's** share of making-up the past **shortfall even on the "Liverpool" method advocated by the Council**. Consequently, whilst it is a finely balanced decision, I conclude that, at the present time, there has been a record of persistent under delivery of housing in the district.

229. On this basis, and in line with paragraph 47 of the Framework, a 20% buffer needs to be applied to the five year housing requirement figure, increasing it (**on the "Liverpool" approach**) to 5,128 dwellings. Based on the Council's estimate of the deliverable supply of 5,258 there would currently be a 5.1 years supply of deliverable housing land.

230. **The Council's** May 2017 estimate of supply (5,258) has been challenged by many on a number of counts, but fundamentally in terms of the assumed start dates of a number of the sites allocated in the plan, in particular the strategic development areas. A range of figures averaging around 4,400 has been suggested as a more realistic estimate of the supply of deliverable housing land in the next five years. As detailed in my assessment of the site allocations I conclude that, **whilst none of the Council's assumptions regarding start dates** are wholly unrealistic, they are generally somewhat on the optimistic side, particularly in respect of the Oxfordshire Cotswolds Garden Village which the Council forecasts will deliver 220 dwellings in the period to 2021/22. Whilst it is possible that any of the sites could prove to be deliverable in the timescale forecast by the Council, on the balance of probabilities it is very likely that one or more will not do so, particularly if a compulsory purchase order were to be

necessary in respect of supporting transport infrastructure or there are any delays in adopting the Garden Village AAP. On this basis the supply figure **would fall from the Council's contention of 5,258**. A reduction of only 135 dwellings or so would mean that the Council would not be able to identify a five year supply of deliverable housing land and consequently the plan would be out of date. Therefore, this is not a prudent approach on which to base the plan.

231. Two main possible solutions to address this situation were discussed at the hearings: firstly, suspending the examination, for a second time, to enable more sites to be allocated in an effort to secure a more robust 5 year supply of housing land **against the plan's annual average housing requirement**; and secondly, **"stepping"** the year by year housing requirement figure to more closely reflect the realistic trajectory of housing delivery in the district during the rest of the plan period. A third option of increasing the density of development, and thus the number of dwellings to be constructed, on the existing allocations in the plan was also raised. However, there is little evidence to suggest that this particular option is realistic having regard to the character of the areas in which the sites are located and likely infrastructure requirements for more intensive development on individual sites.
232. In terms of allocating more housing sites a number of scenarios were discussed at the hearings. These range from, at the lower end, the need for approximately 900 additional dwellings (to provide a more robust 6 years **supply assuming the Council's 5,258 supply figure is broadly realistic and the "Liverpool" approach to shortfall**) to, at the higher end, around 2,200 additional units (to provide a 5.0 years supply assuming a lower current supply of 4,500 dwellings and the **"Sedgefield" approach to past shortfall**).
233. Under either scenario suitable housing sites would need to be selected and appraised by the Council, consulted upon and included as main modifications in the plan, which would then be likely to need to be the subject of further hearings. As part of this process, and as well as site-specific infrastructure requirements, consideration would need to be given to the district-wide implications for infrastructure, in particular transport, of allocating in the plan significantly more sites for housing than needed to meet the overall plan period requirement figure of 15,950. Assuming the plan was to be found sound and adopted, planning applications would need to be submitted and determined by the Council and all the housing sites then built-out by March 2022 to provide the required additional housing numbers, be that 900 or 2,200 dwellings, or a figure in between. Assuming an average site size of 100 dwellings, the number of additional housing sites needed to be allocated in the plan would be between nine and 22.
234. I have no doubt that delivery of homes by March 2022 could be achieved on any one, or even several, of the numerous sites which have been promoted for housing development, particularly if the planning application process was to run in tandem with the examination/adoption of the plan. However, based on the discussion at the hearings, it seems to me highly unlikely that this would be achieved across all the sites which would be necessary to provide for the additional housing. This is particularly so given that the additional sites would be likely to deliver the majority of their housing in 2020/21 and 2021/22, thus necessitating up to 1,000 or more dwellings per year constructed on these

sites alone, in addition to the around 1,000 per year already forecast by the Council to be constructed in these years. Given that the highest number of dwellings constructed in the district since 1990 is 865 (in 2007/08) there is very little to suggest that this is realistic.

235. Consequently, allocating more houses in the plan in an attempt to achieve a **five year supply against the plan's annual average housing requirement figure** would be likely to fail and cannot, therefore, be considered to be a sound approach. Moreover, it is the application of the 20% buffer which gives rise to these housing supply difficulties faced by the Council. Paragraph 47 of the NPPF makes clear that the buffer should consist of sites moved forward from later in the plan period. However, the situation in West Oxfordshire would require more than the plan period housing requirement to be provided for in the plan (ie going significantly beyond the approach to buffers set out in the NPPF) and yet still there would be a strong likelihood of it not achieving the desired outcome.

236. The alternative approach now suggested by the **Council would "step"** the housing requirement figure to reflect the likely reality of delivery of the sites already included in the plan and, in particular, the strategic development areas (SDAs). Paragraph 52 of the NPPF identifies that the supply of new homes can sometimes be best achieved through larger scale developments such as new settlements or extensions to existing towns. The SDAs included in the plan accord with this guidance, although such sites commonly take a number of years to reach the start of construction. **"Stepping" the overall housing requirement figure as follows** would appropriately reflect the realities of delivery of the SDAs:

- 2011/12 – 2020/21 – 550dpa
- 2021/22 – 2022/23 – 800 dpa
- 2023/24 – 975 dpa
- 2024/25 – 2030/31 – 1,125 dpa

237. Whilst challenging, the 1,125 dpa requirement for the last years of the plan period is realistic in the context of the highest annual delivery since 1990 of 865 dwellings. And, it is clearly much more realistic than the around 2,000 dpa **delivery which would be required in the coming five years if the 'Sedgefield' approach to addressing shortfall in delivery were applied and no "stepping" of the housing requirement were to take place.** Of course, this reduced requirement figure would not prevent more houses being constructed in the next five years, even up to or more than the 5,528 dwellings forecast by the Council.

238. On this basis, **assuming a 20% buffer and the Council's supply figure** it would be able to demonstrate a 6.6 years supply of deliverable housing land. On the basis of lower estimates of supply put forward by other parties, the figure would be in the order of 5.3 years. Moreover, it would be unlikely that the, much-challenged, Council assumption that the Oxfordshire Cotswolds Garden Village will deliver 220 dwellings by 2021/22 would be crucial to it being able to demonstrate a five year supply of deliverable housing land. I conclude that, in reality, the supply figure is likely to be somewhere between the two

extremes indicated above. But, either way, one can be confident that the plan would provide for an ongoing five year supply of housing, on the basis of the staged housing requirement and 'Liverpool' approach to addressing shortfall.

239. I note the fundamental opposition of some to this approach, although there is nothing in national policy or guidance to indicate that it is inappropriate. Indeed, there would be little point in the NPPF paragraph 47 requirement that authorities produce a trajectory showing the expected rate of housing delivery for the plan period, if a straight line trajectory (ie involving no "stepping") was the only acceptable appropriate approach to housing delivery. It is the case that the *Planning Practice Guidance* indicates that where the Sedgefield approach to shortfall is not realistic, Councils should work with neighbouring authorities under the Duty to Co-operate. However, it is partly because (through the duty) the plan provides for some Oxford City housing needs to be met in West Oxfordshire that it is not realistic that past shortfall can be **addressed within the next five years. It would be senseless for Oxford City's unmet needs, which have been "exported" to West Oxfordshire in line with the agreement reached by the Growth Board, to be then "re-exported" to another district** simply so that West Oxfordshire could operate the "Sedgefield" approach to past shortfall. Alternative, less back-loaded, "stepped" trajectories have been suggested, although I am not persuaded that these are more appropriate than that proposed by the Council, particularly given that the Council makes **clear that faster delivery than the "stepped" housing requirement is encouraged.**
240. The analysis of supply set out above is based on data to 31 March 2017. Updated data to March 2018 is not yet available and it would be likely to undesirably delay completion of the examination and adoption of the plan to await this. There is almost always some relevant new evidence or guidance which is expected to shortly emerge. If the completion of plan examinations were to be delayed to take account of such new evidence/guidance few plans would ever be adopted. However, this does emphasise the importance of provision being made to review the plan if necessary.
241. Notwithstanding the transitional arrangements for the examination of local plans, under the revised NPPF (July 2018) the buffer to be applied to the calculation of an authority's five year housing requirement will be determined by the Housing Delivery Test. The data determining whether or not a 5% or 20% buffer will apply in West Oxfordshire will not be available until later this year. However, given that a 20% buffer has been applied to the calculations **set out above, it appears to be highly unlikely that the district's housing supply situation will be worse than the between 5.3 and 6.6 years** I have concluded as being the likely situation at the point of adoption of the plan.
242. Consequently, for the plan to be based on a prudent and realistic approach, and, thus, for it to be effective, **MM9 and MM10** are necessary. This provides for the "stepped" annual housing requirement figures as set out above and for the use of the 'Liverpool' approach to addressing past shortfall, whilst making clear that faster delivery of housing is encouraged. The recommended modification corrects a supporting text error, in terms of the past shortfall figure, included in the modification which was subject to consultation and also provides more clarity in relation to use of the "Liverpool" approach. The modification also provides for delivery of the plan to be kept under close

review and for an early review of the plan to take place should it emerge that **the plan's housing requirement is not being delivered**. It has been argued that the policy should be more prescriptive about the circumstances in which a plan review would be required. However, whilst this might be appropriate where review of the housing requirement figure is necessary to, for example, take account of yet to be quantified unmet needs from a neighbouring authority, it **is not, in my judgement, necessary in West Oxfordshire's situation**. It will be in **the Council's interests to review the plan** as and when necessary to ensure that an ongoing five year supply of deliverable housing land can be demonstrated. Moreover, notwithstanding this, new statutory requirements which have come into force during the examination, mean that the plan must be reviewed, and altered if necessary, within five years of its adoption in any case.

243. In conclusion, and subject to the above-mentioned modifications, it is likely that the plan will provide for the delivery of the 2011 - 2031 housing requirement and, subject to review of it as necessary, for a rolling five year supply of deliverable sites for housing.

Issue 11 – whether or not the plan's policies in respect of transport, movement and supporting infrastructure are positively-prepared, justified, effective and consistent with national policy

Overall Transport Implications of the Plan

244. Considerable concern has been expressed at the likely transport impacts, in particular traffic congestion and air quality, of the overall amount of new development proposed in the plan. The *Evaluation of Transport Impacts* study has assessed the likely impact of the overall housing and employment development proposed and concludes that existing problems of congestion are likely to worsen, particularly at points along the A40 and at a number of junctions in Chipping Norton, although it notes that there is the potential for mitigation schemes to reduce this.

245. An increase in traffic is, to my mind, an almost inevitable consequence of the **plan's strategy of meeting the objectively**-assessed needs for housing and employment in accordance with national policy. The extent of future congestion and traffic related air quality problems will substantially depend on **individuals' decisions** about where and how they travel. However, the plan appropriately seeks to locate new development such as to minimise, as far as practicable, the need to travel and to maximise use of modes of transport other than the private car. Indeed, the proximity of housing sites to the main towns has been, appropriately, a key factor in decisions on housing site selection. With this in mind I conclude as being soundly-based **the Council's and County Council's judgement that any adverse transport implications of the development proposed in the plan are likely to be outweighed by the benefits of providing for the identified housing and employment needs**.

Policy OS5 – Supporting Infrastructure

246. Policy OS5 sets out the appropriate, strategic level requirement that new development should deliver or contribute towards the provision of necessary supporting infrastructure. However, for the policy to be justified, **MM6** is necessary, adding the requirement for timely provision and making clear that

the phasing of large developments may be required with later phases being contingent on essential infrastructure being in place; appropriately, such decisions will be made on a case by case basis. I have given consideration to a number of further suggested changes to policy OS5, but conclude that these lack the necessary flexibility and could, in practice, be unjustified. As a result they could undermine **the Council's ability to ensure that necessary** infrastructure is secured as part of new developments.

Policies T1, T3 and T4 - Sustainable Transport, Public Transport, Walking and Cycling and Parking Provision

247. Policies T1, T3 and T4 are positively-**prepared and are supportive of the NPPF's** core planning principle of making the fullest possible use of public transport, walking and cycling by focussing development in locations which are or can be made sustainable, whilst recognising the role car parking can play in supporting town and village centres. They are also fundamental to my conclusions above in relation to the overall transport impacts of the plan. However, in the interests of clarity and effectiveness, **MM23** makes specific reference to walking, cycling and public transport in policy T1 and **MM25** includes reference to safe and convenient routes to school, an alteration I have made in the light of consultation comments on the main modifications. With respect to policy T4, a number of local parking problems have been raised. Whilst important issues in their own right, the plan is not unsound in not seeking to specifically address these, and I am satisfied that the objectives of the policy, together with the car parking provisions of the town centre strategy policies, are compatible with potential solutions to any existing and emerging parking problems.

Policy T2 - Highway Improvement Schemes

248. Complementing policy OS5, policy T2 details the new strategic transport infrastructure which is to be delivered in support of the development proposed in the plan. Following the suspension of the examination, and in the light of the additional development proposed in the plan, the Council has advocated adding to this policy the Eastern Link Road at Chipping Norton and the Western Spine Road at Eynsham. The modified policy also states that necessary strategic highway improvements associated with the Oxfordshire Cotswolds Garden Village will be identified and safeguarded through the relevant AAP. I have addressed detailed concerns about a number of the schemes listed in the policy in Issues 5, 7, and 8 above and, overall, conclude that, whilst full funding for all the schemes is not currently a certainty, they represent a sound approach to ensuring that adverse transport impacts of the new development proposed in the plan are minimised. In respect of the garden village, the supporting text refers to the possibility of a northern link road, although the need for this is to be examined as part of the AAP and the reference to it is not an indication that it has been, to date, identified as a justified scheme. **MM24**, which includes the above-mentioned additional highway schemes, is therefore necessary for the plan to be positively-prepared and justified.

249. There are aspirations for other road improvement schemes, particularly at Carterton, but there is no evidence to indicate that they are needed to support the planned development or that they are, otherwise, likely to come forward in

the plan period. Their inclusion in policy T2 is, thus, not necessary for the plan to be sound.

Conclusion

250. In conclusion, subject to the above-mentioned modifications, the plan's policies in respect of transport and movement and supporting infrastructure are positively-prepared, justified, effective and consistent with national policy.

Issue 12 – whether or not the plan's policies in respect of environmental and heritage assets are positively-prepared, justified, effective and consistent with national policy

Policies OS3, OS4, EH1, EH2, EH3, EH4, EH5, EH6 and EH7 – Environmental and Heritage Assets

251. In principle the above-listed policies together provide a comprehensive and positively-prepared approach to ensuring the prudent use of natural resources; high quality design (including of the public realm); the protection of landscape character, biodiversity, green infrastructure and the historic environment; the minimisation of flood risk and the promotion of renewable/low carbon energy. As such they are supportive of several of the core planning principles set out in paragraph 17 of the NPPF. However, I detail below the modifications which are necessary for these policies to be sound. A large number of other detailed changes to the policies and their supporting text have been suggested, none of which, however, are fundamental to the soundness of the plan. In this regard, and in relation to suggestions that the **plan's requirements should be both more and less restrictive, I have borne in mind the importance of the policies being suitably flexible. It is also the case that wording that is not identical to that in national policy is not necessarily in conflict with it and there is not a need for the policies to repeat either themselves or each other.**

252. The 2016 *Water Cycle Study*, prepared at the request of the Environment Agency, identifies that West Oxfordshire is within an area of demonstrable water stress and indicates that securing a reduction in water use would be a more reliable and sustainable approach than seeking to abstract more water. This justifies the application of the optional Building Regulations requirement that new residential development should achieve water efficiency of a maximum of 110 litres per person per day. The most recent *Local Plan Viability* report factored in a realistic cost of £9 per dwelling and demonstrates that this would not undermine the viability of residential development. I have seen no persuasive evidence to support the argument that this requirement is not practically achievable. This requirement forms part of **MM4**, which is thus needed for the plan to be justified and effective. In the interests of clarity this modification also identifies minimising summer solar gain and maximising winter solar heating as potential forms of the efficient and prudent use of natural resources. **MM5**, which rewords parts of policy OS4 in respect of environmental assets is necessary for consistency of the plan with national policy.

253. As submitted policy EH1 (Landscape Character) briefly reiterates national policy in respect of development in the AONB. However, bearing in mind the **proportion of the district within this designation, it is necessary for the plan's**

effectiveness for more specific, local policy guidance to be provided in this respect. Consequently, new policy EH1a, (**MM26 and MM27**) which specifically concerns the AONB, is necessary for the plan to be sound. For the plan to be justified **MM27** is also necessary to refer in policy EH1 to the avoidance of pollution, including by noise and light and to the important aim of maintaining or improving tranquillity and dark-sky quality. Light pollution and dark skies are also appropriately and sufficiently referenced in policy EH6 (as proposed to be modified) and the supporting text of policy EH1a. Whilst suggestions have been made for some very detailed additional policy requirements in respect of lighting and dark skies, having regard to national policy, I am satisfied that the plan is not unsound in not including them. However, I concur with the Council that they would be appropriately considered for inclusion in a future review of the *West Oxfordshire Design Guide SPD*.

254. To ensure that policy EH2 (Biodiversity and Geodiversity) is justified and consistent with national policy, **MM28 and MM29** are needed. These modifications require impacts on geodiversity to be minimised, seek to protect priority species and appropriately require biodiversity impact assessment of development proposals, albeit that it is right that the policy allows for alternative, appropriate approaches to the British Standard. The modification as consulted on included a requirement that all development should retain features of biodiversity. However, this potentially conflicts with the other, more detailed, requirements of the policy and I have therefore deleted this clause from the modification I am recommending. The supporting text of the policy, as proposed to be modified, refers to the biodiversity mitigation hierarchy and it is not necessary for this to be also referenced in the policy itself.
255. In the interests of clarity, and thus effectiveness, **MM30 and MM31** are necessary, which separate policy EH3 into two policies, one addressing Public Realm and Green Infrastructure (EH3) and the other Sport, Recreation and **Children's Play** (EH3a). **Policy EH3's statement that contributions towards local green infrastructure will be sought where appropriate is justified, in the light of the NPPF's core planning principles of securing high quality design and recognising the importance of open land for, amongst other things, wildlife and recreation. Since such provision is likely to vary enormously from site to site, it is not feasible for this requirement to be specifically tested for viability. However, should green infrastructure requirements render a specific proposal unviable the Council will inevitably consider the development's accordance with other plan policies and the plan as a whole in determining an application for planning permission.**
256. In line with national policy, policy EH4 provides in-principle support for decentralised and renewable/low carbon energy development, although to ensure consistency with the *Local Planning* Written Ministerial Statement of 2015, and given that the plan does not specifically identify suitable sites for wind turbines, **MM32** is needed to make clear that the policy does not apply to wind turbines. Additional text concerning solar farms is also necessary for the policy to be effective and justified. Subject to modification (also part of **MM32**) to provide clarity about the circumstances in which they will be required, the policy's requirements in respect of decentralised energy systems are justified and consistent with national policy. **As detailed in the policy's**

supporting text, such systems have the potential to play an effective role in the transition to a low carbon future which is one of the core planning principles of national policy. Paragraphs 96 and 97 of the NPPF make clear that authorities should identify opportunities for decentralised energy systems and that development should comply with local plan requirements regarding such systems. The subsequent Written Ministerial Statement concerning housing standards makes clear that this element of national policy remains unchanged.

257. For policy EH5 (Flood Risk) to be justified and effective **MM33** is necessary to make clear that sustainable drainage systems should support improvements in water quality and help address pressures on sewer infrastructure. Consistent in principle with paragraph 110 of the NPPF, policy EH6 sets out requirements in respect of environmental protection. However for the policy to be justified and effective, modifications (**MM34**) are necessary to emphasise the importance of control over lighting in remote rural locations and to reflect the up to date position regarding the *Oxfordshire Minerals and Waste Local Plan*.

258. Policy EH7 (Historic Environment), as originally submitted, was criticised as being not fully consistent with national policy whilst at the same time providing inadequate locally specific detailed policy guidance. I share these concerns and, thus, for the plan to be justified, effective and consistent with national policy **MM5, MM35, MM36, MM37, MM38, MM39, MM40, MM41, MM42 and MM43** are necessary. In the light of consultation comments I have very slightly altered the wording of MM36 to align with the wording in national policy. In addition to a revised, overarching historic environment policy EH7, these modifications provide for appropriate detailed requirements and criteria to be set out in six further policies addressing Conservation Areas (EH8), Listed Buildings (EH9), Traditional Buildings (EH10), Historic Landscape Character (EH11), Registered Historic Parks and Gardens (EH12), Scheduled Monuments and Other Nationally Important Archaeological Remains (EH13) and Non-designated Heritage Assets (EH14).

259. Policy EH7's statement that its requirements in respect of assets of national significance will apply to non-designated heritage assets which are shown through the relevant evidence to be of national significance is a sensible one. Whilst it arguably goes further than national policy, this requirement is not **inconsistent with NPPF paragraph 135's statement that balanced judgements** are required on proposals affecting non-designated assets, having regard to their significance. It would to my mind be almost impossible to produce a comprehensive, yet workable definition of traditional buildings. Thus, the absence of this from the plan (policy EH10) is not a soundness issue and I am satisfied that the necessary judgements can be appropriately made on a case by case basis.

Conclusion

260. In conclusion, subject to the above-mentioned modifications, **the plan's** policies in respect of environmental and heritage assets are positively-prepared, justified, effective and consistent with national policy.

Other Matters

261. Throughout the examination, I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of a

number of matters including the provision for accommodation for gypsies and travellers and for accessible and adaptable housing.

Overall Conclusion and Recommendation

262. The plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

263. The Council has requested that the appointed Inspector recommends MMs to make the plan sound and capable of adoption. I conclude that subject to recommended main modifications set out in Appendix 2 the West Oxfordshire Local Plan 2031 satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework (March 2012).

Malcolm Rivett

INSPECTOR

This report is accompanied by the following Appendices:

Appendix 1: **Doc IN015, Inspector's Preliminary Findings** – Part 1, December 2015

Appendix 2: Schedule of Recommended Main Modifications

WEST OXFORDSHIRE LOCAL PLAN EXAMINATION**INSPECTOR'S PRELIMINARY FINDINGS – PART 1****The Housing Requirement, the needs of Oxford City and the Duty to Co-operate****1. Introduction**

1.1 As previously indicated, following the first week of hearings in November, I am publishing these Preliminary Findings to establish how the Examination should proceed. This note focuses on the crucial matters of the housing requirement, the needs of Oxford and the Duty to Co-operate. It focuses on those matters where I have identified shortcomings and on which I consider further work is required. It does not seek to address all points raised on these matters. Part 2 of my Preliminary Findings address, so far as is necessary at this stage, other matters covered in the first week of hearings.

1.2 I conclude in this Note that the housing requirement in the submitted local plan of 10,500 dwellings is not justified and has not been derived from a process which complies with the requirements of the NPPF. Accordingly, further work is required which, if the Council wishes to proceed, will mean a suspension of the Examination. I will confirm arrangements for any suspension once the Council has considered how it wishes to proceed and how long the further work will take.

1.3 **The Secretary of State's letter to the then Chief Executive of the Planning Inspectorate of 21 July 2015 and the Minister of State's Written Statement on Local Plans** both indicate that Inspectors should be highlighting significant issues at an early stage to give Councils a full opportunity to respond. This Note has been prepared in that context.

2. Background to the Council's justification of the housing requirement

2.1 The National Planning Policy Framework (NPPF) paragraph 159 requires Councils to prepare a Strategic Housing Market Assessment (SHMA), working with neighbouring authorities where housing market areas (HMA) cross administrative boundaries. The Oxfordshire SHMA (G L Hearn Limited, April 2014, HOU2) was produced on behalf of all the Oxfordshire authorities acting together through the Oxfordshire Spatial Planning and Infrastructure Partnership (SPIP), the predecessor to the Oxfordshire Growth Board (OGB). West Oxfordshire Council was the lead authority for this task. The SHMA identifies a HMA for the whole of Oxfordshire, including West Oxfordshire (West Oxon). There is no evidence of substance to come to a different view on the extent of the HMA.

2.2 The Council accepts (eg WOLP29, 4.3 and the Statements of Common Ground, SCG, with the other Councils) that the Oxfordshire SHMA provides the most up-to-date, comprehensive, objective assessment of housing need, including affordable housing needs available for the Oxfordshire HMA and that it is an appropriate basis on which to progress cross-boundary work to identify and accommodate **Oxford City's unmet housing need**.

2.3 The SHMA identified a range of housing needs for each of the Oxfordshire authorities derived from demographic evidence, economic projections and affordable housing need. Its recommendations are based on the midpoint of the identified range (eg HOU2, Table 90). For West Oxon, **the SHMA's recommendation was 660 dwellings**

per annum (dpa) which would total 13,200 dwellings over the whole plan period. The **local plan's** proposed 10,500 dwellings (525 dpa) thus falls significantly short of the **SHMA's** recommendation. All the other authorities in Oxfordshire have accepted the **SHMA's** mid-point recommendation as the basis for the progression of their local plans; **Cherwell's** local plan has already been adopted on this basis. Equally importantly, the SHMA is accepted by all the authorities as the basis for identifying the needs of Oxford City, a substantial portion of which cannot be met within **the City's** boundaries.

2.4 **The starting point for the Council's decision not** to follow the SHMA is in 9.17 of the SHMA: *West Oxfordshire stands out as having delivered significantly higher housing provision relative to its South East Plan targets over the 2006-11 period. It delivered almost 1,400 additional homes over and above its housing target. This level of growth was a result of several urban extensions coming forward at the same time, resulting in high levels of in-migration which have influenced household projections moving forward. As such, the District Council may wish to further consider this in light of the Planning Practice Guidance which highlights the need to consider previous over-supply as well as under-supply. No adjustment to figures has been made at the SHMA, but there is potentially a good basis for doing so with reference to previous household projections and needs' assessments alongside the South East Plan targets.*

2.5 It is unfortunate that this issue was not dealt with expeditiously at the time, either as an integral part of the final production of the SHMA, or as an immediately following Supplement, which could have made any necessary technical adjustments to the demographic starting point whilst remaining consistent with all the other assumptions in the SHMA. Any such Supplement could then have been put to the other Oxfordshire Authorities for agreement.

2.6 **The Council's approach was to commission further work from other consultants.** In particular *An Analysis of West Oxfordshire's future housing requirement* (2011-2029) by Dr K Woodhead, June 2014 (HOU3). This is a wide-ranging piece of work. Amongst other matters, it explores the extent to which the higher rates of house building in the mid-2000s influenced migration rates and thus population projections; it makes various methodological criticisms of the SHMA generally; and seeks to develop household projections based on the then recently published ONS 2012 Sub National Population Projections (SNPP) in advance of the household projections from DCLG. The Council also commissioned a *Validation of Objectively Assessed Housing Need* (Cambridge Centre for Housing and Planning Research, CCHPR, January 2015, HOU4).

2.7 **The Council's criticisms of the SHMA and the basis for selecting a different figure is** summarised in its *Housing Position Statement* July 2015 (HOU1) with a summary at 2.9. This paper included new demographic modelling from a third consultant (Demographer John Hollis) which compared the most recent DCLG Household Projections with projections based on alternative migration rates. In response to my Preliminary Questions and Comments (July 2015, IN 001) the Council published WOLP1, August 2015.

2.8 The 3 consultants' reports produce a variety of projections and/or recommended figures/ranges for a housing **requirement. None specifically explain why the plan's figure** of 525 dpa is justified. The Council draws selectively on this evidence. WOLP1, paragraph 2.23 highlights the main elements of HOU3 (Woodhead) and HOU4 (CCHPR) on which it still relies. However, the diversity and complexity of the evidence and the lack of a coherent, single evidential narrative (such as found in the SHMA) has made it **difficult to weigh all aspects of the Council's evidence in testing the soundness of the**

plan's housing requirement. I have therefore focussed on the main elements in contention. In as much as the Council highlighted national guidance which indicates that the most recent Government projections should be the starting point for housing needs assessments, I have given particular attention to the work of Hollis comparing the DCLG 2012 SNPP based household projections with his alternative migration projections (HOU1, Table at p20 and App1 Table 1).

3. Is the *process* by which the Council developed its housing requirement sound?

3.1 The Council indicates that it had consistently expressed concern about aspects of the SHMA at the OGB, which is co-ordinating joint working on housing across Oxfordshire, and at its predecessor, the SPIP (see WOLP1, 3.4-3.13). I have seen no written reports in which these concerns were set out, but I accept that various concerns were raised, at least orally, with varying weight. I also accept that the Council has consistently been concerned that the demographic starting point used in the SHMA is unreasonable because the methodology projects forward a household migration rate derived from a period when there was a spike in house building. But there is nothing to indicate any formal dissent by the Council when the SHMA was approved by all the Councils for publication as just that, a SHMA for Oxfordshire. Indeed, **the Council's SsCG** with the other Oxfordshire Councils confirm that West Oxon, along with the other Councils, ***signed off the consultant's methodology developed to produce the SHMA*** (WOLP 28, 29 and 30, paragraph 4.2). Other documents indicate a long-standing shared commitment to take forward the SHMA in local plans (eg the ***Oxfordshire Statement of Cooperation***, SD4, App 3, paragraph 5.3 and the ***Oxford and Oxfordshire City Deal*** p5, SD11).

3.2 There is no evidence that the Council has shared with its OGB partners the need for new evidence from other consultants; the methodologies to be employed in that new evidence; the **Council's** decision to rely on matters peripheral to the thrust of the SHMA's recommendations (eg the economic baseline; the 40% income threshold for affordable housing); **or the Council's criticisms** of some of the methodology of the SHMA. Most importantly, the Council has not explored with its HMA partners the potential **implications of the Council's approach for the continued legitimacy of the SHMA as evidence to support local plans in the rest of Oxfordshire.**

3.3 Accordingly, there has been a clear failure to accord with the NPPF's requirement to work with neighbouring authorities across the HMA. This is a significant concern for Oxford City, as expressed at the hearing and in its SCG with the Council (WOLP 37, paragraph 3.3). Whatever the technical merits of the various points put forward by the **Council, I could not endorse them as a sound basis for the Council's housing requirement** unless there had been a clear process of joint working with its partner authorities to **consider the implications for the continuing validity of the SHMA's recommendations for those authorities.**

3.4 Joint working across an HMA is essential to ensure a reasonably consistent approach and to avoid unintended distortions in the market. In addition, the credibility of the SHMA is the foundation on which much of the current planning work for the rest of Oxfordshire is based. That does not mean it should be beyond criticism, but a Council should be particularly mindful of the wider implications of criticisms and of the reasoning supporting any local adjustments.

4. The demographic starting point and the significance of past high rates of housing delivery

4.1 The demographic starting point identified in the SHMA for West Oxon is 541 dpa. The SHMA was prepared when the latest household projections were the interim DCLG 2011 based SNPP. These covered only a 10 year period and are widely recognised as not as robust as the previous or subsequent projections. The SHMA had to make a number of assumptions and adjustments to produce robust projections for the plan period to 2031. It therefore makes sense to check the SHMA's demographic assumptions against DCLG 2014 household projections (based on the 2012 SNPP). This latest projection indicates annual growth of 458 households per annum (hpa) which, with a vacancy rate of 5.17%¹, equates to 483 dpa. However, **the Council's** now preferred demographic starting point is 423 hpa/446 dpa (Hearing Statement p4). This is the mid-point of the output of the 2 alternative projections prepared by Hollis (HOU1, Table at p20 and App 1 Table 1). One projection is based on average long term migration trends (2004-2014) and the other on short term migration trends (2009-2014).

4.2 National guidance states: *If a Council has robust evidence that past high delivery rates that inform the projections are no longer realistic – for example they relied on a particular set of circumstances that could not be expected to occur again – they can adjust their projections down accordingly.* (Paragraph: 036Reference ID: 3-036-20140306) **The Council's** view is that there were abnormally high rates of house building which have unfairly influenced projections, particularly as used in the SHMA. The Council explains this spike in building by reference to a number of large allocations coming on stream at a similar time. However, Table 9 in HOU3 indicates that delivery on previously unidentified sites was also making a significant contribution. I do not regard that particular past situation as one which could not be expected to occur again. Indeed, the plan makes several large allocations which the Council expects to be delivering at the same time (see WOLP14, 15, 16, 17, 18 and 19). In the period before the plan is adopted and any necessary allocations are made, development is also likely to occur on a number of previously unidentified sites. So a spike in housing delivery may well occur again. In part at least, this would be the result of the long gap without an up-to-date plan in place. Nevertheless, bearing in mind that ONS population projections are largely based on the past 5 years, it is right to be alert to any unusual factors in the period which feed into a particular projection. I explore this further below.

4.3 Table 10 in HOU3 compares the number of homes built and the ONS assumptions of net migration for the years 1991-2010.² There has been considerable variation in annual completions³. The 3 years 2005-2007 delivered very high numbers (733, 810 and 865 dwellings respectively), whereas recent years have all been below the overall average and below the current annual housing requirement of 525. In 2013 only 186 dwellings were built. With regard to net migration, peak years were 2002 (1,000 persons) 2005 (1,300) and 2006 (1,500). Other years since 2002 were either 700 or 500 persons per

¹ This figure is taken from the Census 2011. Whilst the Council suggests (WOLP1 2.23), that a lower vacancy rate could be applied, it has not done so in the projections it relies on by Hollis. I see no reason to use a rate lower than that in the most recent evidence.

² More recent figures on completions are included in HOU1, Table 13.

³ **It was highlighted at the hearing that the Council's figures** for housebuilding HOU3, Table 10/HOU1, Table 13 are generally higher than the figures recorded by DCLG, as set out in the hearing statement from Barton Willmore, Table 2. However, these differences are not material for the reasoning in this Note.

annum (ppa). So there is no simple, direct correlation between the 2 factors. Woodhead demonstrates that to get a reasonable correlation, a 2 year moving average for migration has to be used (HOU3 ,Table 5 6, paragraphs 6.21-2), but his analysis is in danger of making the issue unduly complicated.

4.4 The interim household projections based on 2011 SNPP (which were the starting point used in the SHMA) would have drawn on migration from the years between 2005-6 and 2009-10 (HOU1, App1, paragraph 4.6) so they would have included at least 1 year with the highest migration flow. The ONS 2012 projection would not have included a peak migration year. This change is illustrated in the lowering of the net average migration figure used in these 2 projections from 720ppa to 595ppa (Barton Willmore Hearing Statement, Table 1)⁴.

4.5 But the SHMA did not use the 2011 SNPP uncritically and made a downward adjustment to the migration assumptions used in its projection, giving a revised net migration figure for West Oxon of 593 ppa (SHMA, Table 20), which is almost the same as that in the latest ONS projection. Thus there is not the evidence to support the **Council's contention that the SHMA's revised demographic starting point was** biased by untypically high migrations flows. **The difference in outcomes between the SHMA's** adjusted projection and the latest DCLG projection must be the result of other factors, such as different Household Representative Rates (HRR) (see below).

4.6 The PAS Technical Advice Note⁵ indicates (6.24) that it is generally advisable to test alternative scenarios based on a longer reference period of 10-15 years, but not to go back earlier than the 2001 Census. That approach would seem appropriate here to even-out over a longer period the very high numbers for net migration in 2005 and 2006. The projection produced by Hollis based on average migration 2004-2014 serves this purpose (HOU1, Table 1).

4.7 Both Hollis' alternative projections adjust for Unattributable Population Change (UPC) as a component of migration. UPC for West Oxon is an overall negative difference of 527 between 2001-2011. Its inclusion by Hollis will have lowered the net migration figures used in his long and short term projections compared with those in Barton Willmore Table 1. There is no right or wrong answer as to whether an adjustment should be made for UPC. ONS do not include it in its projections because it cannot be ascribed with certainty to any one component of change. In any case, UPC will become less relevant in future projections. The PAS Technical Note (6.33-6.35) advises that the default option is to ignore it, but that this may be overridden by local evidence. UPC is not a substantial factor for West Oxon, but I consider that it is reasonable to have regard to it given that the SHMA (HOU2, paragraph 5.23) took it into account. Consistency of approach across the HMA is important. In any further work arising from this Note it would be best to model projections with and without UPC to test its significance.

4.8 **Hollis' projection based on short term trends (2009-2014)** should not be used to establish a demographic starting point. The net migration figure for the recent short term period is 472 ppa (excluding UPC). In each year of this period housing delivery

⁴ None of **Barton Willmore's** figures include any adjustment for Unattributable Population Change (UPC) whereas John Hollis' alternative projections in HOU1 do adjust for UPC as a component of migration. This is discussed later in this Note.

⁵ Planning Advisory Service ***Objectively Assessed Need and Housing Targets*** Technical advice Note Second Edition July 2015.

was considerably below the housing requirement in the plan. In as much as there is a link between the 2 factors, a projection based on this short term migration figure would be too low, since it would be embedding a significant trough in delivery - the opposite **effect to the Council's concern with the SHMA**. The selection by the Council of its preferred demographic starting point based on the average outputs of the long term and short term projections is therefore also unjustified, since it skews the outcome too much to a period of very low delivery. The next round of ONS population/DCLG household projections could well be lower than the current figures because of this drop in delivery. A cautionary approach will be needed to avoid low delivery arbitrarily justifying a lower future requirement.

4.9 The DCLG 2012 based household projection results in a need for 483 dpa over the plan period. **John Hollis' projection based on migration over 10 years** indicates a need for 491 dpa. These outputs are remarkably similar and both avoid being unduly influenced by untypically high migration. Subject to my comments on Household Representative Rates (HRR) below, they indicate that an up-to-date demographic starting point is around 490dpa. Whilst this is a material reduction from the adjusted demographic figure used in the SHMA, there is no evidence to indicate whether the use of such a figure would result in a change to the figure recommended in the SHMA, if all other assumptions had remained constant.

4.10 I am not going to give preference to one of these 2 projections over the other. In part this is because, as modelled by Hollis, the 2 projections produce very different projections for the resident labour force (HOU1, Table 5). This difference raises considerable uncertainties when trying to compare the likely increase in the local labour force with projections for economic growth and jobs. In any further work, the Council needs to be alert to the reasons for this disparity of outcomes.

4.11 Hollis uses the HRRs from the DCLG 2012 based projections and he specifically endorses the appropriateness of their use. The PAS Technical Note (6.36 -6.43) also generally endorses the latest HRRs as a new starting point and discourages any attempt to blend these with earlier rates - a practice that emerged because of the perceived shortcomings of the rates used in the interim 2011 SNPP based projections. Criticism of the 2014 HRRs focuses on the 25-34 age group. This still projects a substantial difference from the 2008 HRR for this group, whereas for all other age groups they are more closely aligned (see Hearing Statement by GL Hearn, Appendix 4). The continued decline in HRR for this younger age group may well reflect some suppression of household formation as a result of the recession, but it is difficult to judge the extent to which structural changes arising from the recession have in fact produced a permanent change to household formation. Recently proposed Government initiatives may have an effect (but these were not discussed at the hearing). There is not the evidence to recommend any specific adjustment, but in any further work the Council should be mindful that a demographic starting point of around 490 dpa may be embedding some suppression of household formation.

4.12 I need to comment on 2 further matters. Woodhead (HOU3, paragraph 6.32) and some other representors suggest that the extent by which West Oxon **"over delivered"** housing in the period 2006-2011 compared with the requirement applicable at the time in the South East Plan should be taken off the housing requirement. This over delivery amounted to about 1,400 dwellings. I do not consider that any such subtraction would be justified. As already highlighted, the thrust of National Guidance on this point is to

review the appropriateness of projections which might contain periods of unusual high growth. I have already done so. The residents of the additional 1,400 dwellings are now an integral part of the population of West Oxon and need to be included in future projections of population and household change. I note that the SHMA (HOU2, Table 90) added to the demographic starting points the shortfalls in delivery that occurred in the other Oxfordshire districts. However, those additions did not make any material difference to the recommended housing requirements for those districts because the housing needs arising either from the committed economic growth projection or to meet affordable housing needs were much greater. Conversely, subtracting a substantial **figure for past "over delivery" from the calculated housing requirement** for West Oxon would make a significant difference and mean that assessed needs would not be met. This would be contrary to Government policy.

4.13 Finally, I note that several representors consider that the SHMA is fundamentally flawed and suggest alternative methods for determining a housing requirement, which they consider should be lower than that proposed in the plan. However, much of the reasoning in those radical approaches simply does not reflect the aims of Government policy expressed in the NPPF to meet housing needs of all types (subject only to the test in paragraph 14) or national guidance on the appropriate methodology for assessing housing need.

5. Affordable Housing

5.1 The SHMA identifies a net annual need of **274** affordable dwelling for West Oxon (HOU2, Table 54). The Council recognises that the SHMA provides the most up-to-date, objective assessment of affordable housing need across the Oxfordshire HMA; that the assessment methodology is consistent with national guidance; and was agreed by all partners, including West Oxon (WOLP1, 2.36). However, the Council suggests that the figure for need should be lower, in contradiction to this general endorsement of the SHMA. In particular, the Council considers that it would be reasonable to apply an income threshold of 40%, rather than the 35% which is the basis for the SHMA's recommendation. In my experience, the 35% threshold is higher than thresholds commonly adopted in this type of exercise elsewhere, but is justified for the reasons set out in the SHMA (HOU2, paragraphs 6.17-6.20). I have seen no evidence of substance to suggest that a lower threshold is necessary here.

5.2 The Council highlights the reference in the SHMA (paragraph 6.81) to the fact that, in practice, some households are likely to be adequately housed whilst paying more than 35% of their income on housing and that if a 40% threshold were to be used then the need would be reduced, as shown in SHMA Table 57. However, the fact that some households do spend more than 35% of their income on housing is not a good reason to take a 40% threshold as justified for assessing the need for affordable housing. There is no evidence to indicate that circumstances in West Oxon are so noticeably different to the rest of the HMA as to justify a different threshold here, nor any real assessment by the Council as to whether it is reasonable to do so. In my view it is not, given that it represents such a substantial proportion of income.

5.3 The Council highlights (WOLP1, paragraph 3.39 and at the hearing) that with the inclusion of the pipeline of affordable housing developments, the identified need would be lower (SHMA, Table 55). However, in relying on the pipeline supply identified in the

SHMA there is a considerable risk of double counting and confusion when considering likely affordable housing delivery. I consider delivery further below.

5.4 The SHMA addresses the current backlog of affordable need over the 18 year assessment period. This approach is broadly accepted by most hearing participants in the context of the overall recommendations of the SHMA. In that context, I see no reason to disagree, given the substantial uplift in housing that the SHMA was recommending to address affordable housing need, amongst other matters.

5.5 I consider that the SHMA's recommended figure of a need for 274 affordable dwellings per annum is justified for the period 2013-2031. There are inevitably some weaknesses in a model which uses a detailed assessment of short term needs as part of the assessment of needs over the whole plan period, as acknowledged in the SHMA and highlighted by the Council (eg WOLP1, paragraphs 3.48 -3.49). But the SHMA follows national guidance. In any case, it is inevitable that needs will be reassessed during that period and the figure is not intended to remain fixed for 18 years without review.

5.6 I turn now to affordable housing delivery, to compare with the level of need. The Council's position is set out clearly in WOLP1, paragraphs 3.56-3.79 and accompanying tables. Some key points in using this data are as follows. Firstly, affordable housing delivery should be counted only from 2013, since that is the base date of the SHMA's assessment of such needs. Secondly, if actual provision in 2013-2015 is to be counted along with existing commitments at 1 April 2015 (as per WOLP1, pp19-20) then the pipeline supply referred to in the SHMA must be ignored. Thirdly, I have deferred to later hearings the viability and deliverability of the Strategic Development Areas allocated in the plan. Some of the landowners/promoters of those sites dispute their ability to deliver policy compliant levels of affordable housing as well as major items of infrastructure. Thus the delivery figures in WOLP1 (table at paragraph 3.62) have not been tested at this stage and these figures are accepted only for the purposes of the present calculation. Finally, the implications of the Housing Bill and of the Government's Autumn Statement on the delivery of affordable housing have not yet been taken into account, but will need to be in due course as the consequences of both become clearer.

5.7 The Council's assessment of delivery of affordable housing includes affordable housing expected to be delivered from suitable SHLAA sites (WOLP1, paragraph 3.64). These are not allocated in the plan, but are needed to make-up overall housing delivery to the requirement of 10,500. Assuming that the affordable housing policy remains unchanged, the assumption of delivery from this source is reasonable.

5.8 In addition, the Council has included in its calculation 300 affordable dwellings from large site windfalls (WOLP1, paragraph 3.67)⁶. Before and at the hearings, I indicated that I could not see the justification for large site windfalls. If the SHLAA is robust it should have captured most large sites likely to come forward. In as much as some suitable SHLAA sites might not come forward, alternative large site windfall sites would be a substitute for them and any affordable housing provision they make would be a replacement for any lost from the assessment made in paragraph 3.64. Alternatively, if the SHLAA sites referred to in the plan were translated into allocations (as discussed at the hearing and on which I comment in my Part 2 Note) then any large site windfalls that were permitted would, in effect, be increasing housing provision/delivery above

⁶ These are sites above the SHLAA threshold of 10 dwellings.

10,500. Clearly, if overall housing provision/delivery increases, more affordable housing can be expected. That is the reason national guidance indicates that consideration should be given to such an uplift to boost affordable housing delivery.

5.9 If the Council is confident of large site windfalls then that weighs in favour of an additional uplift to boost affordable housing delivery. For present purposes, I have excluded the 300 figure in paragraph 3.67 from expected delivery. Finally, the Council estimates that 100 additional **units will come from "other sources"**. Given the modest nature of this figure in the overall balance, it was not discussed at the hearing, but I have included it for this calculation.

5.10 Taking off the 300 dwellings for the reasons given above, about 2,689 affordable units are expected to be delivered in the period 2013-2031 (WOLP1, paragraph 3.76, adjusted downwards). This compares with an assessed need for 4,932, based on the SHMA's 35% income threshold. There is clearly a very substantial shortfall. Given the NPPF's definition of affordable housing, private rented accommodation, where households unable to compete in the market may be in receipt of public subsidy (housing benefit), should not be taken into account in determining the need for affordable housing or how to respond to that need.

5.11 I have seen no evidence of any careful, balanced consideration by the Council of the extent to which the gap in affordable housing provision should be narrowed by an uplift in market housing. Any assessment previously made by the Council has been on the basis of a new demographic starting point that is too low (446 dpa, WOLP1, paragraph 3.29); on an unjustified income threshold (40%); and with undue regard to the past limited success in delivering affordable housing (see below). The Council needs to address this matter afresh in the light of these Preliminary Findings and the need for consistency with the SHMA's core assumptions.

5.12 The Council consider that the SHMA adopts a too mechanistic approach in uplifting housing to ensure that the needed affordable housing is delivered. The Council considers that the SHMA's assumption of 40% delivery of affordable housing from all housing development in West Oxon is unrealistic given the policy threshold of 10 dwellings at which the policy takes effect (as proposed in the local plan) and different percentages to be applied in different parts of the district. The SHMA had to make an assumption of the appropriate percentage to apply in advance of local plans coming forward. If the SHMA was too optimistic, it would point to a need for a **greater** uplift to be considered, not a lower uplift as the Council suggest. The Council also highlights relatively low levels of affordable housing delivery in the past (HOU1, Table 13) which have averaged 20% over the past 14 years. However, given that national policy seeks a step-change in housing delivery and for all needs to be met where possible, the limited success of the past should not be used to justify continued under-provision. I have seen no specific evidence, such as from Registered Providers, of insurmountable difficulties in stepping-up delivery and the Council should be actively considering how to maximise the delivery of affordable housing.

6. Economic growth and jobs

6.1 The SHMA took account of housing needs based on securing a sufficient workforce to deliver the jobs anticipated to arise under what it terms the **Committed Economic Growth** scenario (eg SHMA, Table 90). This scenario took account of factors expected to

stimulate above-trend growth in employment in Oxfordshire (SHMA, 4.19-4.20). This scenario was assessed in more detail in *Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and SHMA* February 2014 (ECON2). This scenario underpins the stated ambitions of the Local Economic Partnership (LEP) and provided the justification for bids for substantial public investment to help bring about this growth (such as through improvements in critical transport infrastructure). A number of strands of such investment are being co-ordinated by the OGB. The Council is part of the LEP and OGB (as already highlighted) and there is no evidence to suggest that the Council is seeking to formally dissociate itself from the economic aims of these bodies.

6.2 Notwithstanding the above, the Council now considers that this **Committed Economic Growth** scenario should not be taken into account in deriving the housing requirement for West Oxon. The Council considers that the **plan's housing requirement** appropriately aligns with the baseline economic projection. As explained in ECON2, the baseline projections assumes the continuation of the historical relationship between growth in the local area relative to the South East or UK (dependent on the type of business concerned).

6.3 I recognise that, as highlighted by the Council, economic forecasts for Oxfordshire/West Oxon have changed considerably over recent years, must be treated with a degree of caution and will no doubt change again over the plan period. Nevertheless, **the Government's aim, as expressed in the NPPF**, is that the planning system should facilitate economic growth and Councils must plan positively to secure it. Strategies for housing, employment and other uses should be integrated (NPPF 158). Local Plans should be aspirational, but realistic (NPPF 154). For the following reasons I consider that the Council is not justified in planning on the basis of the economic baseline.

6.4 Firstly, it is inconsistent with its support for the LEP and work of the OGB. As with housing issues across an HMA, so economic issues are best addressed consistently across an economic area, as those bodies seek to do, and as reflected in the recommendations of the SHMA. There is no evidence of the Council seeking, let alone obtaining, the agreement of partner authorities to it assuming a lower rate of economic growth in West Oxon than the rest of the County, or of considering with them the wider implications of doing so. Indeed, the Council states that it remains fully supportive of the LEP and the overall economic ambitions contained in the Strategic Economic Plan (WOLP1, paragraph 3.84). I cannot see how both positions are tenable.

6.5 Secondly, my understanding is that the other emerging local plans in Oxfordshire and Cherwell's adopted local plan are all planning to accommodate the **Committed Economic Growth** scenario. Such commitment across most of Oxfordshire is a strong factor in making that level of growth become a reality and not remain only an aspiration.

6.6 Thirdly, the **Committed Economic Growth** scenario is based on the identification of a range of significant planned projects likely to boost economic development (ECON2, chapter 4). It is not an arbitrary increase over the baseline. In the light of the unique opportunities for economic development in parts of Oxfordshire, it is surely a location where there is considerable economic potential to be realised, but which might be inhibited if not actively planned for. Planning to meet the **Committed Economic Growth** scenario fits well with **the NPPF's aim to: respond positively to wider opportunities for growth** (paragraph 17, 3rd bullet).

6.7 Fourthly, the growth rate in the economic baseline (0.6% to 2021 and 0.5% pa thereafter, ECON2 p9) is below the most recent economic forecasts for West Oxon from 3 leading forecasting bodies. These project rates of 0.8% or 0.9%. These forecasts and related predicted job growth match the predicted 0.8% growth for West Oxon in the ***Committed Economic Growth*** scenario (Barton Willmore Hearing statement, Tables 4/5).

6.8 Fifthly, in as much as West Oxon has suffered some specific job losses in high profile sectors since **the SHMA's assessment**⁷, I consider that this negative impact has been more than offset by another opportunity. Employment growth (contractors and indirect effects) has taken place and is likely to continue to arise from major changes at RAF Brize Norton (WOLP32, particularly pp6-7) which are not referred to in the justification for Committed Economic Growth scenario

6.9 The Council has other concerns with the economic modelling in the SHMA. HOU3 and some of the other submissions from the Council contest that the whole model is too circular and is flawed. On reflection, however, the Council did not pursue this fundamental criticism of the SHMA at the hearing. In my view, the SHMA rightly seeks to integrate economic and housing projections. It is nevertheless right to be alert to the fact that the economic projections themselves incorporate a population projection. In this case, the baseline projection incorporates ONS 2011 based SNPPP (ECON 2, p2). A substantial proportion of the predicted economic growth in West Oxfordshire is a product of population growth (eg retail and health sectors). In as much as a revised demographic starting point is now justified and is lower than that used in the SHMA then there would be less growth from this factor.

6.10 The Council emphasises that West Oxon is not closely related to the key locations for growth in Oxfordshire, but this is reflected in the different growth rates for the districts in the ***Committed Economic Growth*** scenario. For example, the Vale of White Horse has a growth rate of 1.5% compared with West Oxon's 0.8% (ECON2, Table 5.2).

6.11 The Council considers the ***Committed Economic Growth*** scenario is a "policy-on" position and therefore should not be taken into account in identifying the objective assessment of need. But any necessary distinction between policy-off and policy-on considerations does not change the position on this matter here. In identifying the appropriate housing requirement in the Plan, "policy-on" matters relating to an agreed economic strategy (as expressed by the LEP and OGB) should be taken into account so that there is effective integration between housing and employment strategies.

6.12 I accept that if West Oxon were to plan for 525 dpa rather than the 660dpa recommended in the SHMA, then across Oxfordshire as a whole there would still be sufficient housing to support a labour force consistent with ***Committed Economic Growth*** because of the additional housing also recommended to meet affordable housing need (WOLP1, paragraphs 3.93-3.94). However, such an argument could be used by any of the other Councils to justify a lower housing requirement. There is no justification for an exception to be made for West Oxon. Collective and consistent action across the HMA would soon unravel if such arguments prevailed.

6.13 The Plan does not contain any figure for job growth. Although I am firmly of the view that the Council should adopt the ***Committed Economic Growth*** scenario to plan for

⁷ eg the closure of Caterham F1 which was an advanced engineering company highlighted for growth in the Committed Economic Growth scenario (ECON2, p23).

higher growth than the baseline, I am not in a position to specifically endorse the related projection of job growth of 7,900 for West Oxon (ECON2, Table 5.2). If the Council chooses to adopt a new demographic starting point then that projection may be different.

6.14 The baseline scenario now preferred by the Council projects job growth of 5,100 additional jobs. The Council see this as compatible with increase in the local labour force arising from the proposed 10,500 dwellings. The modelling by Hollis (HOU1, App 1, Table 2) projects a resident labour force of just over 6,000 which, allowing for commuting and other adjustments, equates to sufficient local workers to support about 4,755 jobs (Hearing Statement, p15). However, as already highlighted, labour force projections vary widely depending on the particular demographic inputs, even for a similar overall housing figure. Accordingly, in any further work, the Council should be alert to these variations and may need into take account of a range of possible labour force projections in determining whether the plan's **housing provision** would provide sufficient local workers to support the *Committed Economic Growth* scenario.

6.15 The plan refers (paragraph 6.18) to evidence that around 60ha of employment land is required over the plan-period. **The Council's most up to date evidence on** employment land requirements is in ECON1 (*West Oxfordshire Economic Snapshot* January 2015). In section 6.5 this sets out employment land requirements based on the *SHMA's Alternative Population Scenario* and then sensitivity tests its conclusions against the *Committed Economic Growth Scenario*. On current evidence, the quantum of 60ha is about right to facilitate the higher growth that I consider should be planned for, but there appear to be issues with the availability of some of the land. The distribution and deliverability of employment land is a matter for later consideration and was not discussed at the November hearings.

7. The needs of Oxford City

7.1 The SHMA identifies substantial housing needs for Oxford City. Very recently the OGB has agreed a working assumption of 15,000 homes to be found outside the City **within the adjoining districts to meet the City's unmet needs (WOLP37 and WOLP34)**. The OGB has been coordinating work to meet **the City's** needs since the beginning of 2015. Unfortunately, the timetable for completing the various work streams has been progressively slipping. The most recent timetable (WOLP34, Appendix *Post SHMA Strategic Work Programme*) indicates July 2016 for the publication of a statement of cooperation setting out an agreed distribution, but some of the core evidence should be completed by April 2016.

7.2 The submitted plan does not identify or seek to address any unmet needs of Oxford City. The Council envisages a local plan review as the vehicle to address any apportionment made by the OGB next July. The Council is now committed to completing **such a review within 2 years and a review is included in the Council's Local Development Scheme (LDS)**. The Council sees its approach as consistent with that accepted by the Inspector for the Cherwell local plan. However, I can understand the concerns of those, including Oxford City, who consider that such a timescale may easily slip, given how long it has taken to produce the current local plan. Whilst Oxford City considers that the Duty to Cooperate has been *broadly complied with*, it considers the local plan to be unsound **in not addressing Oxford's needs in some way (WOLP37, paragraph 2.3c)**.

7.3 I consider compliance with Duty later in this Note. The NPPF refers to planning strategically across local boundaries in paragraphs 178-181. The soundness test of *positively prepared* states that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. In my view, this requirement would normally mean that a plan should seek to address the needs of an adjoining area where there is clear evidence of unmet need, as is the case here. However, where well before submission of the plan, the relevant authorities have made a commitment to address those needs; have established a firm mechanism to assess the most sustainable distribution of such needs; and intend to apportion them to the adjoining districts, then it is not unreasonable for plans that are already well advanced not to be delayed whilst that process is completed. That was the position at Cherwell where the plan will have been adopted for a year before the final apportionment is made by OGB.

7.4 Following the process established by the OGB is more likely to lead to the most sustainable pattern of development compared with each local plan independently exploring how to meet some element of the unmet need. The latter would most likely result in the last local plan to be prepared having the largest share of unmet needs to accommodate. Oxford City did not seek provision for any of its needs to be met in West Oxon at an early stage in the plan process⁸. In addition, I have not seen any specific subsequent request from the City to the Council to make provision for a specific figure or share of its needs. In this context, it was not essential for the Council to have included in this plan at the outset a figure for the unmet needs of Oxford, since any such figure would have been fairly arbitrary. Unfortunately the position is more complicated than this.

7.5 The timescales for the adoption of this plan and the finalisation of the apportionment of unmet needs have always overlapped. Prior to submission, the Council should have been alert to the likely difficulties that could arise. When the Council published this local plan in Spring 2015, the OGB timetable for **apportioning Oxford's** needs was September 2015 (WOLP34, Appendix *Post SHMA Strategic Work Programme*), well before this plan could have been **adopted**. **The Council's LDS of January 2015 (SD6)** indicates an adoption date of March 2016. It was only after submission that the OGB reset the timetable with a new deadline for completion of its work by March/April 2016. The date of adoption in the **Council's** Addendum LDS (DS6a) is now Spring 2016. So the Council should have been conscious that the local plan would not be adopted until after the OGB had made its final apportionment and should have considered the implications. As a result of my conclusions in this note, I cannot see how this plan could be adopted before July 2016, which is the latest date for the final decisions of the OGB.

7.6 In eventually considering the soundness of this plan (following the further work and consultation on the matters of concern in this Note) regard would have to be given to any apportionment to West Oxon made by the OGB. If any such apportionment is made then that would become part of the housing need for the district. Any such apportionment is not immediately a definitive housing requirement, since it must be taken through a local plan process to test its deliverability and environmental impact. Nevertheless, it will be a figure of considerable significance and weight, since it will have

⁸ See for example the letter from Oxford City Council to West Oxon, 16 April 2013 confirming that the Duty is regarded as fulfilled (SD4, App 2).

emerged from an evidence-based process to inform spatial options for growth outside Oxford City. My initial view is that it would need to be taken into account in calculating the 5 year land supply.

7.7 If the local plan were to proceed to adoption without having regard to any apportionment that had been made by the OGB, it would immediately be out of date. Such a plan would be inconsistent with one of the aims of the plan-led system which is to bring more certainty as to where development would take place. In addition, the development strategy of the plan may well not be appropriate to accommodate any significant needs from Oxford and additional new greenfield sites would need to be found. It would not be conducive to planning for sustainable development for potential additional sites to meet West Oxon's needs (arising from an increased housing requirement) to be considered in isolation from sites required **for Oxford City's needs**. The combination of needs might well result in a different scale/location of site being required, changing the mix of relevant considerations in the choices that have to be made.

7.8 Having identified this problem, I cannot be prescriptive as to how it should be resolved. In WOLP37, paragraph 4.2, the Council and Oxford City Council agree that if I **concur with the City's concerns** (which, on this point, I largely do) then the matter can be addressed through main modifications to the plan. I recognise that if the OGB were to decide that no share of Oxford's needs should be accommodated in West Oxon and all the City's needs were to be met in other districts then this difficulty would not arise. However, it would be a very high risk strategy to rely on that outcome.

8. Duty to Cooperate

8.1 **The Council's position is set out in its *Statement of Compliance with the Duty to Cooperate* (SD4).** The only aspects in serious dispute relate to its approach to the SHMA and the unmet needs of Oxford City.

8.2 I consider that the joint commissioning and joint endorsement of the SHMA for the Oxfordshire HMA and the mechanism and work streams put in place (before submission of this plan) by the OGB to address the needs of Oxford City are very important elements in demonstrating compliance with the Duty.

8.3 **However, the Council's actions (before submission) in commissioning and using evidence and argument that criticised the methodology of the SHMA in several key respects (as explained above) were in danger of jeopardising the use of the SHMA across the rest of Oxfordshire and thus of undermining the effectiveness of strategic planning in the County. But as I have been largely unconvinced by those arguments, the actual damage caused by the Council's actions in this regard should not be too great.**

Accordingly, strategic planning can continue to be effective on the basis of the SHMA (or any subsequent joint update). On this basis, I am able to conclude that the Council has fulfilled the Duty. This favourable conclusion does not however change my view that the Council has not sufficiently worked with its neighbours across the HMA in determining its own housing requirement and thus fails soundness in this regard.

9. Other Statutory Matters

Sustainability Appraisal (SA)

9.1 At submission, I consider that the SA had adequately addressed reasonable alternatives for a plan seeking only to address the needs of West Oxon. Two alternative options (a *new village* and *concentration of development along transport corridors*) were dropped following the Issues and Options Stage in 2008 (CD2 paragraphs 4.7-4.10). I consider that the rejection of these 2 options was reasonable for the reasons the Council gives in the context of meeting the needs of West Oxon alone. If any further work undertaken by the Council anticipates some apportionment of **Oxford's needs to West Oxon**, then the range of alternative strategies to be considered in the SA will need to be reviewed.

9.2 Other, more generic criticisms were made regarding the **SA. The Council's response** to these criticisms is in WOLP3. For the reasons given by the Council, I am satisfied that the SA is adequate in its general scope and approach. (I am not however commenting here on its assessment of individual sites.)

Habitat Regulations Assessment (HRA)

9.3 In my prehearing questions I sought clarification regarding the HRA and the Oxford Meadows SAC. WOLP31 confirms that Natural England are content with the HRA. To ensure consistency between the assumptions/recommendations made in the HRA and the plan, additional text is needed along the lines proposed by the Council (WOLP38, FMs 1, 21 and 24). These should be included in any future consultation on changes.

9.4 I am satisfied that all other statutory requirements have been met.

10. Overall Conclusion and Way Forward

10.1 **The local plan's housing requirement of 10,500 has not been justified.** The **Council's** evidence to support its housing requirement has been worked-up independently of its partners in the rest of the HMA without due regard for consistency across the HMA and the potential wider implications of its actions.

10.2 **The Council's new preferred demographic starting point is too low** because it has been unduly influenced by recent years of very low delivery (well below the annual rate proposed in the plan).

10.3 The Council has not given explicit consideration, based on appropriate assumptions, to an uplift in housing provision to narrow the substantial gap between the need for affordable housing (as identified in the SHMA) and the likely delivery of affordable housing from the **plan's proposed** 10,500 dwellings.

10.4 **The Council's preference for a baseline** economic growth rate rather than **Committed Economic Growth** outlined in the SHMA and endorsed by all the other Councils in Oxfordshire is unjustified and out of step with the **Government's aims for** economic growth. I am not satisfied that the local plan's housing requirement would provide sufficient labour force to support Committed Economic Growth.

10.5 I am unable to identify what the housing requirement should be. It is likely to be between the recommended figure in the SHMA (660dpa) and that in the plan (525dpa).

The SHMA provides a recommended housing figure for West Oxon developed on assumptions that would largely overcome the above shortcomings. If, however, the Council wants to do further work in the light of the above findings, then it is essential that the methodology is first shared with its partner authorities in the HMA and that the Council considers any concerns raised. The conclusions of the Council's work will also need to be shared and the implications considered. If the housing requirement increases, then additional sites and/or changes to the existing site allocations will need to be made.

10.6 In any further work, the Council will need to consider the implications for the plan **of any apportionment to West Oxon of Oxford City's unmet housing needs** due to be made by the OGB in July 2016. If this is not taken into account the plan would be out of date before it can be adopted (assuming that some apportionment is made to West Oxon).

10.7 Once the Council has reflected on these findings, it will need to decide whether to withdraw this plan or put forward changes to make it sound. If it wishes to proceed with this plan, it should set out an indicative timetable for the further work which is necessary, including public consultation on proposed changes and appropriate recording and commentary on the further representations made. Once I receive that indicative timetable, I will be able to determine for how long I should suspend the Examination.

10.8 Part 2 of my Preliminary Findings comment on matters considered under Issues 3 and 4 at the hearings in November. Some further work will be identified in that Note, although it does not have the strategic significance of the matters in this Note.

Simon Emerson

Inspector

15 December 2015

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification																																																												
MM1	MAIN14 FMM2	Table 4.1 – Settlement Hierarchy	<table border="1"> <thead> <tr> <th colspan="3" data-bbox="965 344 1888 376">Main Service Centres</th> </tr> </thead> <tbody> <tr> <td data-bbox="965 376 1245 408">Witney</td> <td data-bbox="1245 376 1547 408">Carterton</td> <td data-bbox="1547 376 1888 408">Chipping Norton</td> </tr> <tr> <th colspan="3" data-bbox="965 416 1888 448">Rural Service Centres</th> </tr> <tr> <td data-bbox="965 448 1245 480">Bampton</td> <td data-bbox="1245 448 1547 480">Burford</td> <td data-bbox="1547 448 1888 480">Charlbury</td> </tr> <tr> <td data-bbox="965 496 1245 528">Eynsham</td> <td data-bbox="1245 496 1547 528">Long Hanborough</td> <td data-bbox="1547 496 1888 528">Woodstock</td> </tr> <tr> <td data-bbox="965 544 1245 663">Oxfordshire Cotswolds Garden Village</td> <td data-bbox="1245 544 1547 663"></td> <td data-bbox="1547 544 1888 663"></td> </tr> <tr> <th colspan="3" data-bbox="965 671 1888 703">Villages</th> </tr> <tr> <td data-bbox="965 703 1245 735">Alvescot</td> <td data-bbox="1245 703 1547 735">Aston</td> <td data-bbox="1547 703 1888 735">Bladon</td> </tr> <tr> <td data-bbox="965 743 1245 775">Brize Norton</td> <td data-bbox="1245 743 1547 775">Cassington</td> <td data-bbox="1547 743 1888 775">Chadlington</td> </tr> <tr> <td data-bbox="965 783 1245 815">Churchill</td> <td data-bbox="1245 783 1547 815">Clanfield</td> <td data-bbox="1547 783 1888 815">Combe</td> </tr> <tr> <td data-bbox="965 823 1245 855">Curbridge</td> <td data-bbox="1245 823 1547 855">Ducklington</td> <td data-bbox="1547 823 1888 855">Enstone</td> </tr> <tr> <td data-bbox="965 863 1245 927">Filkins & Broughton Poggs</td> <td data-bbox="1245 863 1547 927">Finstock</td> <td data-bbox="1547 863 1888 927">Freeland</td> </tr> <tr> <td data-bbox="965 935 1245 967">Fulbrook</td> <td data-bbox="1245 935 1547 967">Great Rollright</td> <td data-bbox="1547 935 1888 967">Hailey</td> </tr> <tr> <td data-bbox="965 975 1245 1007">Kingham</td> <td data-bbox="1245 975 1547 1007">Langford</td> <td data-bbox="1547 975 1888 1007">Leafield</td> </tr> <tr> <td data-bbox="965 1015 1245 1078">Middle Barton</td> <td data-bbox="1245 1015 1547 1078">Milton-u-Wychwood</td> <td data-bbox="1547 1015 1888 1078">Minster Lovell (South of Burford Road)</td> </tr> <tr> <td data-bbox="965 1086 1245 1118">North Leigh</td> <td data-bbox="1245 1086 1547 1118">Over Norton</td> <td data-bbox="1547 1086 1888 1118">Shipton-u-Wychwood</td> </tr> <tr> <td data-bbox="965 1126 1245 1158">Standlake</td> <td data-bbox="1245 1126 1547 1158">Stanton Harcourt</td> <td data-bbox="1547 1126 1888 1158">Stonesfield</td> </tr> <tr> <td data-bbox="965 1166 1245 1198">Tackley</td> <td data-bbox="1245 1166 1547 1198">Wootton</td> <td data-bbox="1547 1166 1888 1198">Ascott under Wychwood</td> </tr> <tr> <th colspan="3" data-bbox="965 1206 1888 1238">Small Villages, Hamlets and Open Countryside</th> </tr> <tr> <td colspan="3" data-bbox="965 1238 1888 1262">All other villages and settlements not listed above plus open countryside.</td> </tr> </tbody> </table>	Main Service Centres			Witney	Carterton	Chipping Norton	Rural Service Centres			Bampton	Burford	Charlbury	Eynsham	Long Hanborough	Woodstock	Oxfordshire Cotswolds Garden Village			Villages			Alvescot	Aston	Bladon	Brize Norton	Cassington	Chadlington	Churchill	Clanfield	Combe	Curbridge	Ducklington	Enstone	Filkins & Broughton Poggs	Finstock	Freeland	Fulbrook	Great Rollright	Hailey	Kingham	Langford	Leafield	Middle Barton	Milton-u-Wychwood	Minster Lovell (South of Burford Road)	North Leigh	Over Norton	Shipton-u-Wychwood	Standlake	Stanton Harcourt	Stonesfield	Tackley	Wootton	Ascott under Wychwood	Small Villages, Hamlets and Open Countryside			All other villages and settlements not listed above plus open countryside.		
Main Service Centres																																																															
Witney	Carterton	Chipping Norton																																																													
Rural Service Centres																																																															
Bampton	Burford	Charlbury																																																													
Eynsham	Long Hanborough	Woodstock																																																													
Oxfordshire Cotswolds Garden Village																																																															
Villages																																																															
Alvescot	Aston	Bladon																																																													
Brize Norton	Cassington	Chadlington																																																													
Churchill	Clanfield	Combe																																																													
Curbridge	Ducklington	Enstone																																																													
Filkins & Broughton Poggs	Finstock	Freeland																																																													
Fulbrook	Great Rollright	Hailey																																																													
Kingham	Langford	Leafield																																																													
Middle Barton	Milton-u-Wychwood	Minster Lovell (South of Burford Road)																																																													
North Leigh	Over Norton	Shipton-u-Wychwood																																																													
Standlake	Stanton Harcourt	Stonesfield																																																													
Tackley	Wootton	Ascott under Wychwood																																																													
Small Villages, Hamlets and Open Countryside																																																															
All other villages and settlements not listed above plus open countryside.																																																															

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM2	MAIN15 FMM3	Paragraphs 4.15 – 4.19	<p>4.15 Taking account of previous consultation responses and the results of several SA reports, the overall strategy of this Local Plan is to steer most <u>a significant proportion of</u> future development into the Witney, Carterton and Chipping Norton Sub-Areas, with a particular focus on the three main service centres of Witney, Carterton and Chipping Norton.</p> <p>4.16 These towns <u>currently</u> offer the widest range of services and facilities, have suitable and deliverable development sites available, are accessible by a choice of transport modes (other than rail) and offer a good range of job opportunities. <u>A number of</u> Strategic Development Areas (SDA) <u>and smaller ‘non-strategic’ allocations</u> are therefore proposed at Witney, Carterton and Chipping Norton (see Section 9 – Strategy at the Local Level).</p> <p>4.17 Not all growth can or indeed should go to Witney, Carterton and Chipping Norton however and there is a need for development elsewhere <u>to help meet the unmet housing needs of Oxford City</u>, to spread the potential benefits of growth and <u>to</u> help sustain the more rural parts of the District.</p> <p>4.18 Outside of the three main towns of Witney, Carterton and Chipping Norton, the focus of development will be the six rural service centres of Bampton, Burford, Charlbury, Eynsham, Long Hanborough and Woodstock. These contain a good range of services and facilities and are considered to be suitable for accommodating development of an appropriate scale and type that would help to reinforce their existing service centre roles and meet their development needs and those of their immediate hinterlands. Eynsham has a particularly important role to play with a strategic urban extension proposed to the west of the village which will help to meet both West Oxfordshire’s own identified housing needs and those of neighbouring Oxford City. It is anticipated that this development will be served by a new road link from the A40 to the south of Eynsham.</p>

			<p><u>4.18a To the north of Eynsham on the other side of the A40, a 'strategic location for growth (SLG)' has been identified at which a new rural service centre will be created in the form of a new village based on 'garden village' principles. Government funding has been secured to take this exciting concept forward and accelerate the delivery of housing to meet identified needs. The detailed planning of the scheme will be taken forward through a separate Area Action Plan (AAP).</u></p> <p><u>4.18b The historic town of Woodstock has a relatively good range of services and facilities and good accessibility to Oxford. It can accommodate a reasonable scale of development, whilst protecting its important historic character and the setting of Blenheim Palace, in order to deliver affordable housing, enhance local services and reinforce its role as a service centre. Three medium scale allocations are proposed on different sides of the town in order to complement the structure and form of the town.</u></p> <p><u>4.18c Of the remaining service centres, Burford and Charlbury are located in the Cotswolds Area of Outstanding Natural Beauty and, thus whilst containing a good range of services and facilities are relatively constrained in terms of their capacity to accommodate further development. Whilst not within the AONB, Bampton and Long Hanborough have a more restricted range of services and facilities. As such, more modest levels of development are anticipated in these four rural service centres to help reinforce their existing roles. This includes two site allocations which are proposed at Long Hanborough.</u></p> <p>4.19 Beyond the rural service centres, some development will be supported in the villages but this will be limited to that which respects the village character and local distinctiveness and would help maintain the vitality of the local community. <u>A number of site allocations are proposed to ensure the delivery of new housing on suitable, available sites.</u></p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM3	MAIN16 FMM4	Policy OS2 – Locating Development in the Right Places	<p><u>Policy OS2 – Locating Development in the Right Places</u></p> <p><i>Main Service Centres, Rural Service Centres and Villages</i></p> <p>New homes, jobs and supporting services <u>A significant proportion of new homes, jobs and supporting services will be primarily focused within and on the edge of the main service centres of Witney, Carterton and Chipping Norton. A number of site allocations are proposed to ensure identified needs are met. The distribution of development is set out in Policy H1. This includes Strategic Development Areas (SDAs) at Witney, Carterton and Chipping Norton. Development elsewhere will be more limited and will focus on meeting locally identified community and business needs.</u></p> <p>Due to the size of the settlement and its proximity and connections to Oxford City, Eynsham will also make a significant contribution towards meeting the identified housing needs of the District and Oxford City with a strategic urban extension to be provided to the west of the village.</p> <p>A new rural service centre – Oxfordshire Cotswolds Garden Village - will be created to the north of Eynsham to contribute towards Oxford City’s needs. This will comprise a self-contained settlement based on ‘garden village’ principles and will play a complementary role to Eynsham.</p> <p>Woodstock is suitable for a reasonable scale of development, whilst protecting its important historic character and the setting of Blenheim Palace, in order to deliver affordable housing, enhance local services and reinforce its role as a service centre.</p> <p>The rural service centres of Bampton, Burford, Charlbury, Eynsham, Long Hanborough and Woodstock are suitable for development of an appropriate scale and type that would help to reinforce their existing service centre role. Sites may be specifically identified by the Council</p>

			<p>within or on the edge of some of these service centres, including through Neighbourhood Plans.</p> <p><u>Burford and Charlbury are relatively constrained by their AONB location and Bampton and Long Hanborough have a more restricted range of services and facilities. Consequently, these rural service centres are suitable for a modest level of development to help reinforce their existing roles. Two site allocations are proposed at Long Hanborough.</u></p> <p>The villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. <u>A number of site allocations are proposed to ensure identified needs are met. Further allocations may be made through Neighbourhood Plans. Sites may be specifically identified by the Council within or on the edge of some of these villages to help meet local needs, including through Neighbourhood Plans.</u></p> <p>Proposals for residential development will be considered in accordance with Policy H2 of this Local Plan.</p> <p><i>Small Villages, Hamlets and Open Countryside</i></p> <p>Development in the small villages, hamlets and open countryside will be limited to that which requires and is appropriate for a rural location and which respects the intrinsic character of the area. <u>Proposals for residential development will be considered under policy H2.</u></p> <p>Appropriate development <u>Proposals for non-residential development that is regarded as appropriate</u> will include:</p> <ul style="list-style-type: none"> • re <u>re</u>-use of appropriate existing buildings which would lead to an enhancement of their immediate setting, with preference given to employment, tourism and community uses; • new accommodation proposed in accordance with policies specifically for travelling communities;
--	--	--	---

			<ul style="list-style-type: none"> • pProposals to support the effectiveness of existing businesses and sustainable tourism; • dDevelopment which will make a positive contribution to farm and country estate diversification; and • tTelecommunications development sited and designed to minimise impact upon the environment. <p>Proposals for residential development will be considered in accordance with Policy H2 of this Local Plan.</p> <p><i>General Principles</i></p> <p>All development will be located where<u>should</u>:</p> <ul style="list-style-type: none"> • Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality; • it forms <u>Form</u> a logical complement to the existing scale and pattern of development and/or the character of the area; • <u>Avoid the coalescence and loss of identity of separate settlements;</u> • it would<u>Be compatible with adjoining uses and</u> not have a harmful impact on the amenity of existing occupants; • it <u>As far as is reasonably possible</u> protects or enhances the local landscape and the setting of the settlement/s; • it makes use of previously developed land where available, provided it is not of high environmental value (e.g. ecology) and the loss of any existing use would not conflict with other policies of this plan; • it does <u>n</u>ot involve the loss of an area of open space or any other feature that makes an
--	--	--	--

			<p>important contribution to the character or appearance of the area;</p> <ul style="list-style-type: none"> • it can be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities; • it is not be at risk of flooding or likely to increase the risk of flooding elsewhere; • it complies with policies for the protection of the natural environment and heritage assets <u>Conserve and enhance the natural, historic and built environment;</u> • it <u>s</u>afeguards mineral resources; • <u>In the AONB, give great weight to conserving landscape and scenic beauty and comply with national policy concerning major development;</u> • in the Green Belt, it complies with national policies for the Green Belt; and • <u>Be supported by all necessary supporting infrastructure can be provided including that which is needed to enable access to superfast broadband.</u>
MM4	MAIN18	Policy OS3 – Prudent Use of Natural Resources	<p><u>Policy OS3 – Prudent Use of Natural Resources</u></p> <p>All development proposals (including new buildings, conversions and the refurbishment of existing building stock) will be required to show consideration of the efficient and prudent use and management of natural resources, including:</p> <ul style="list-style-type: none"> • making the most efficient use of land and buildings, whilst having regard to the character of the locality • delivering development that seeks to minimise the need to travel • minimising use of non-renewable resources, including land and energy, and maximising opportunities for travel by sustainable means • minimising their impact on the soil resource*

			<ul style="list-style-type: none"> • minimising energy demands and energy loss through design, layout, orientation, landscaping, materials and the use of technology; • Minimising summer solar gain, maximising passive winter solar heating, lighting, natural ventilation, energy and water efficiency and reuse of materials; • maximising resource efficiency, including water. All new residential development will be expected to achieve the optional building regulations requirement for water efficiency of 110 litres/person/day. • minimising risk of flooding; • making use of appropriate sustainable drainage systems; • using recycled and energy efficient materials; • minimising waste and making adequate provision for the re-use and recycling of waste; and causing no deterioration and, where possible, achieving improvements in water or air quality. <p>All development proposals will be required to achieve high standards of sustainable design and construction including achieving low carbon development in line with Government policy.</p> <p><i>* Guidance includes the 2011 DEFRA publication: Construction Code of Practice for the Sustainable Use of Soils on Construction Sites</i></p>
MM5	MAIN19	Policy OS4 – High Quality Design	<p>Policy OS4 – High Quality Design</p> <p>High design quality is central to the strategy for West Oxfordshire. New development should respect the historic, architectural and landscape character of the locality, and contribute to local distinctiveness and, where possible, enhance the character and quality of the surroundings and should:</p> <ul style="list-style-type: none"> - demonstrate high quality, inclusive and sustainable design with the provision of a safe, pleasant, convenient and interesting environment where the quality of the public realm is enhanced and the likelihood of crime and fear of crime is reduced; and - not harm the use or enjoyment of land and buildings nearby including living conditions in

			<p>residential properties; and</p> <ul style="list-style-type: none"> - demonstrate resilience to future climate change, particularly increasing temperatures and flood risk, and the use of water conservation and management measures; and - preserve or enhance areas, buildings and features of historic, architectural and environmental importance, including unlisted vernacular buildings and habitats of biodiversity value; and <u>- Conserve or enhance areas, buildings and features of historic, architectural and environmental significance, including both designated and non-designated heritage assets and habitats of biodiversity value; and</u> - enhance local green infrastructure and its biodiversity, including the provision of attractive, safe and convenient amenity open space commensurate with the scale and type of development, with play space where appropriate. <p>Designers of new development will be expected to provide supporting evidence for their design approach. They should have regard to specific design advice contained in supplementary planning guidance covering the District. The West Oxfordshire Design Guide, <u>Oxfordshire Historic Landscape Appraisal</u>, Landscape Assessments, Conservation Area Appraisals and Cotswolds AONB guidance documents are key tools for interpreting local distinctiveness and informing high design quality.</p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM6	MAIN19 FMM6	Policy OS5 – Supporting Infrastructure	<p><u>Policy OS5 – Supporting Infrastructure</u></p> <p>Where necessary and viable, new-New development will be required to deliver, or contribute towards the timely provision of appropriate-essential supporting infrastructure either directly as part of the development, or through an appropriate financial contribution towards off-site provision.</p> <p>On larger development sites , phasing of development will be required and later phases may be contingent on essential infrastructure being in place.</p> <p>This will include, where applicable the strategic infrastructure items identified within the Council’s Infrastructure Delivery Plan (IDP) and CIL Regulation 123 list as well as non-strategic infrastructure requirements including those associated with individual development proposals.</p> <p>Such provision will be secured through appropriate mechanisms including the use of planning conditions, planning obligations and /or the Community Infrastructure Levy (CIL).</p> <p>Favourable consideration will be given to development proposals that make appropriate provision for supporting infrastructure in a timely manner. Conversely, development proposals that fail to make adequate or timely provision for necessary supporting infrastructure will be resisted.</p>

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM7	MAIN23 FMM7	Paragraphs 5.18 – 5.23a	<p>5.18 In accordance with the overall strategy (Policy OS2) majority a significant proportion of new housing development will be provided at the District’s three main towns of Witney, Carterton and Chipping Norton. This strategy has been tested extensively through consultation and sustainability appraisal (SA) and is considered to represent the most appropriate and sustainable strategy for West Oxfordshire.</p> <p>5.19 It also ensures that in accordance with national policy, at least 10 years’ worth of specific, developable housing sites have been identified including allocated Strategic Development Areas (SDAs) at Witney, Carterton and Chipping Norton. Existing commitments at Witney, Carterton and Chipping Norton will be complemented by a number of site allocations to ensure a continual supply of deliverable housing sites over the plan period.</p> <p>5.20 The remaining housing requirement will be met in the Eynsham – Woodstock and Burford – Charlbury sub-areas, with a particular focus on the main rural service centres and other larger settlements. Eynsham has a particularly important role to play because of its proximity and connections to Oxford City. A strategic urban extension of around 1,000 homes will be delivered to the west of Eynsham contributing in part to West Oxfordshire’s own housing needs (450 homes) as well as the unmet housing needs of Oxford City (550 homes).</p> <p>5.21 The Council’s Strategic Housing Land Availability Assessment (SHLAA) provides an initial assessment of the suitability and deliverability of a number of sites. Additional site allocations will be made in these sub-areas as necessary through the anticipated early review of this Local Plan. The Council will work with the towns, parishes and local communities to identify suitable and deliverable sites including through Neighbourhood Plans. Further housing provision will be made near Eynsham on land to the north of the A40 which is identified as a ‘Strategic Location for Growth’ (SLG). Here a new settlement based on ‘garden village’ principles will be brought forward and form a new rural service centre for the District. The Council has secured Government backing for</p>

			<p><u>the scheme and there is a working assumption that it will provide around 2,200 new homes by 2031 with a strong emphasis on accelerated delivery. The detailed planning of the new village will be taken forward through a separate Area Action Plan (AAP). The Area Action Plan (AAP) will provide a more definitive figure for the number of dwellings the Garden Village is likely to deliver.</u></p> <p><u>5.21a Woodstock has a relatively good range of services and facilities, and relatively good accessibility to Oxford. It can accommodate a reasonable scale of development, whilst protecting its important historic character and the setting of Blenheim Palace. Three medium scale allocations are proposed on different sides of the town in order to complement the structure and form of the town.</u></p> <p><u>5.21b The rural service centres of Bampton and Long Hanborough will be required to make provision for new housing with existing commitments being complemented by two site allocations at Long Hanborough.</u></p> <p>5.22 The proposed distribution of housing is summarised in Policy H1 below. It should be noted that the housing figures for each sub-area are <u>based on past completions and anticipated future supply as of 1st April 2017. They are therefore</u> indicative and should not be taken as absolute requirements or targets. It should also be noted that housing land supply will be calculated on a district-wide basis rather than individually for each sub-area.</p> <p>5.23 A<u>With the exception of the Burford – Charlbury sub-area, an</u> allowance has been made for future ‘windfall’ sites yet to come forward, excluding ‘garden land’ development in line with the NPPF. <u>Within the Burford – Charlbury sub-area, to take account of the more restrictive approach to development that applies to the Cotswolds AONB, no reliance is placed on future windfall development and the amount and distribution of housing identified in Policy H1 is based on past completions and commitments only (as of 1st April 2017) – 774 homes.</u></p> <p><u>5.23a This does not mean that new housing cannot come forward in the Burford – Charlbury sub-area. Indeed, the 774 homes figure should not be treated as a ‘cap’ or ‘ceiling’ to development and planning permission may be granted for additional housing within the sub-area where the proposed development is shown to accord with national and local</u></p>
--	--	--	---

			<u>policy including Policies H1, H2, OS2 and EH1a (where relevant) of this Local Plan. Further explanation is set out in Section 9 – Strategy at the Local Level.</u>										
MM8	MAIN24 FMM8	Policy H1 – Amount and Distribution of Housing	<p>Policy H1 – Amount and Distribution of Housing</p> <p>West Oxfordshire will provide at least 10,500 new homes between 1st April 2011 and 31st March 2031 (525 per year).</p> <p>In accordance with the overall strategy, the majority of new homes will be provided in the Witney, Carterton and Chipping Norton sub-areas with a particular focus on Witney, Carterton and Chipping Norton.</p> <p><u>Provision will be made for at least 15,950 homes in the period 2011 – 2031.</u></p> <p><u>This will comprise 13,200 homes in the period 2011 – 2031 to meet West Oxfordshire’s identified housing needs and a further 2,750 homes in the period 2021 - 2031 to meet Oxford City’s identified housing needs.</u></p> <p>The proposed<u>In accordance with the overall strategy set out in Policy OS2, the distribution of housing to meet West Oxfordshire’s identified housing needs taking account of past completions and anticipated future supply is</u> will be as follows:</p> <table> <tr> <td>Witney sub-area</td> <td>3,700 <u>4,702</u> homes</td> </tr> <tr> <td>Carterton sub-area</td> <td>2,600 <u>2,680</u> homes</td> </tr> <tr> <td>Chipping Norton sub-area</td> <td>1,800 <u>2,047</u> homes</td> </tr> <tr> <td>Eynsham – Woodstock sub-area</td> <td>1,600 <u>5,596</u> homes</td> </tr> <tr> <td>Burford – Charlbury sub-area</td> <td>800 <u>774</u> homes</td> </tr> </table> <p>This is an indicative distribution <u>based on past completions and anticipated future supply</u> and should not be taken as an absolute target for each sub-area or maximum ceiling to limit development. <u>A number of site allocations are proposed to ensure identified needs are met.</u></p> <p><u>The indicative distribution for the Eynsham – Woodstock sub-area includes 2,750 homes to provide for Oxford’s unmet housing need. This will be delivered through a strategic urban</u></p>	Witney sub-area	3,700 <u>4,702</u> homes	Carterton sub-area	2,600 <u>2,680</u> homes	Chipping Norton sub-area	1,800 <u>2,047</u> homes	Eynsham – Woodstock sub-area	1,600 <u>5,596</u> homes	Burford – Charlbury sub-area	800 <u>774</u> homes
Witney sub-area	3,700 <u>4,702</u> homes												
Carterton sub-area	2,600 <u>2,680</u> homes												
Chipping Norton sub-area	1,800 <u>2,047</u> homes												
Eynsham – Woodstock sub-area	1,600 <u>5,596</u> homes												
Burford – Charlbury sub-area	800 <u>774</u> homes												

			<p><u>extension to the west of Eynsham and a new Garden Village to the north of the A40 near Eynsham.</u></p> <p>Development will be monitored annually to ensure that the overall strategy is being delivered. Sites for new housing will be identified through partnership working with local communities, landowners and self-build groups including the use of parish or neighbourhood plans.</p> <p><u>Further allocations may be made through neighbourhood plans in accordance with the overall distribution of housing set out above and in accordance with other relevant plan policies, including in particular the general principles set out in Policy OS2.</u></p>
MM9	<p>MAIN25 MAIN26 MAIN27 MAIN28 MAIN29 FMM9 FMM10 FMM11 FMM12 FMM13 FAM8 FAM9 FAM10 FAM11 FAM12</p>	Paragraphs 5.25 – 5.35	<p><i>Homes already built</i></p> <p>5.25 <u>Of the overall housing requirement (10,500 homes) a number of these homes have already been built in the first few years of the plan period. However, a relatively flat housing market has meant that the number of completions has been relatively low totalling just 823 in the period 2011 – 2014. Of the overall housing requirement (15,950) a number of these homes have already been built in the first six years of the plan period (2011 – 2017). However, a relatively flat housing market and a lack of urgency from the development sector in bringing forward strategic sites, has meant that despite a healthy supply of planning permissions and resolutions to grant planning permission, the number of actual completions has been relatively low totalling just 1,982 from 2011 – 2017 (an average of 330 per year) and creating an under-supply ‘backlog’ of 1,318 homes when assessed against the annual requirement of 550 per year set out in Policy H2. This Local Plan therefore seeks to enable a significant increase in housing supply in order to meet identified needs although it strives to achieve this in a sustainable, controlled manner.</u></p> <p><i>Existing Commitments</i></p> <p>5.26 It is also important to note that a large number of new homes are already in the development pipeline ranging from very small sites for just one house through to much larger sites for several hundred new homes. This includes sites that already benefit</p>

			<p>from planning permission as well as those sites that have a resolution to grant planning permission subject to a legal agreement being completed. <u>In accordance with the Government’s practice guidance the Council will include C2 uses (residential institutions) in its housing land supply assumptions and count them against the overall housing requirement. However this will only apply to ‘self-contained’ properties (e.g. flats/apartments) with their own front door, kitchen etc. and access to communal facilities. The Council will not count individual C2 ‘bedrooms’ e.g. in a nursing home, although, in reality, the provision of such uses is likely to free up a proportion of the existing housing stock within the District.</u></p> <p><u>5.26a There are existing commitments for a number of strategic scale housing and mixed use developments. The largest commitments are:</u></p> <ul style="list-style-type: none"> <u>• Land to the west of Witney (1,000 homes)</u> <u>• Land to the east of Carterton (700 homes)</u> <p>5.27 <u>As of 1st February 2015, the number of homes expected to be delivered through existing commitments was 4,333. As of 1st April 2017, the number of homes expected to be delivered through existing commitments was 5,859 comprising 5,272 on larger sites of 10 or more dwellings and 587 on smaller sites of less than 10.</u></p> <p><u>Strategic Location for Growth (SLG)</u></p> <p><u>5.27a Land to the north of Eynsham has been identified as a Strategic Location for Growth (SLG) – a broad area at which it is proposed that a new settlement is created in the form of a ‘Garden Village’. There is a working assumption that the ‘Oxfordshire Cotswolds Garden Village’ SLG will provide around 2,200 homes in the period 2021 – 2031 which will assist neighbouring Oxford City with its unmet housing need. At present, only a broad area has been defined and the details of the proposal are yet to be fully worked up. As such the Council will prepare a separate Area Action Plan (AAP) to guide the detailed planning of the scheme in consultation with key stakeholders. The Area Action Plan (AAP) will provide a more definitive figure for the number of dwellings the Garden Village is likely to deliver. Further information is set out in Section 9 – Strategy at the Local Level.</u></p>
--	--	--	---

			<p><i>Strategic Development Areas (SDAs)</i></p> <p>5.28 Through this Local Plan we have identified a number of <u>larger</u> housing allocations referred to as ‘Strategic Development Areas’ (SDAs). These are sites <u>of a ‘strategic’ scale</u> that after considerable scrutiny and detailed consideration of reasonable alternatives, are considered to represent the most sustainable locations for strategic-scale housing growth within the District.</p> <p>5.29 In line with the overall strategy, these proposed allocations are focused on the District’s three main towns of Witney, Carterton and Chipping Norton and include: It is anticipated that these sites will deliver around 4,050 new homes by 2031 of which 550 (on land west of Eynsham) are intended to address unmet housing need from Oxford City. The strategic sites include:</p> <ul style="list-style-type: none"> • Land to the east of Witney (400-450 homes) • Land to the north of Witney (1,000-1,400 homes) • Land at REEMA Central, Carterton (200 homes) • Land to the east of Chipping Norton at Tank Farm (600-1,200 homes) • <u>Land west of Eynsham (1,000 homes)</u> <p>5.30 Further information on these sites and the alternative options that have been considered is set out in Section 9 and in the Council’s supporting background evidence¹.</p> <p><u><i>Non-Strategic Housing Allocations</i></u></p> <p><u>5.30a</u> In addition to the strategic location for growth and strategic development areas outlined above, this plan allocates 11 smaller, ‘non-strategic’ housing sites. These will help to ensure a deliverable housing supply in the short-term as smaller sites often have much shorter ‘lead-in’ times to development compared to larger strategic sites.</p> <p><u>5.30b</u> The allocated housing sites are as follows:</p>
--	--	--	--

¹ Sustainability Appraisal, Strategic Housing and Employment Land Availability Assessment, LUC assessment of site options for the Oxfordshire Growth Board, and Site Assessment Matrix

			<ul style="list-style-type: none"> • <u>REEMA North and Central, Carterton (300 homes)</u> • <u>Milestone Road, Carterton (200 homes)</u> • <u>Land at Swinbrook Road, Carterton (70 homes)</u> • <u>Land east of Woodstock (300 homes)</u> • <u>Land north of Hill Rise, Woodstock (120 homes)</u> • <u>Land north of Banbury Road, Woodstock (180 homes)</u> • <u>Land at Myrtle Farm, Long Hanborough (50 homes)</u> • <u>Oliver’s Garage, Long Hanborough (25 homes)</u> • <u>Former Airfield, Stanton Harcourt (50 homes)</u> • <u>Land west of Minster Lovell (125 homes)</u> • <u>Woodford Way Car Park, Witney (50 homes)</u> <p><u>5.30c Further information on these smaller site allocations is set out in Section 9. Subject to resources, the Council will seek to prepare site-specific planning briefs to guide the development of these allocated sites.</u></p> <p><u><i>SHLAA sites Neighbourhood Plans</i></u></p> <p><u>5.31 In line with national policy, the Council has prepared an assessment of potential land availability for new housing in the form of a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA seeks to identify suitable and deliverable housing sites at a range of settlements across the District. A number of these sites are highly likely to come forward for development, indeed a number already have or are in the process of being considered. A further potential delivery mechanism for new housing provision is neighbourhood development plans. These provide the opportunity for local communities to determine the most appropriate locations for development including housing. There are a number of neighbourhood plans underway in the District. Because there is some uncertainty about how many homes neighbourhood plans might deliver, a zero assumption has been factored into current anticipated housing supply figures. Any provision made by neighbourhood plans will therefore increase housing supply over and above that which has been identified in this Local Plan. Any housing allocations that are proposed through neighbourhood plans will need to be in accordance with the overall distribution of housing set out in Policy H1 as well as other</u></p>
--	--	--	--

			<p><u>relevant plan policies including in particular the general principles set out in Policy OS2.</u></p> <p>5.32 It is anticipated that the future delivery of these sites will make a significant contribution towards the overall housing target. Further information on those sites that have been identified as being potentially suitable within each sub-area is set out in Section 9.</p> <p><i>Windfall Development</i></p> <p>5.33 ‘Windfall’ developments are essentially speculative developments on sites that are not known to the Council and have therefore not been assessed through the SHLAA allocated for housing. Such sites can be previously developed (brownfield) land where the current use may no longer be viable or undeveloped, Greenfield sites that the owner wishes to bring forward for development. <u>In some instances they may be ‘rural exception sites’ (RES) whereby affordable housing is provided in locations that would not normally be allowed for new housing.</u></p> <p>5.34 Such windfall development has historically formed a large component of housing delivery in West Oxfordshire and it is reasonable to assume that this trend will continue. We consider that a reasonable estimate of likely windfall delivery over the remaining period of the Local Plan (2015 – 2031) is 125 homes per annum which equates to 2,000 homes overall (400 per sub-area). <u>Such windfall development has historically formed a large component of housing delivery in West Oxfordshire and it is reasonable to assume that this trend will continue. Having regard to past trends and taking account of existing commitments, the number of homes expected to come forward through windfall development in the period 2017 – 2031 is set out below. No reliance is placed on windfall development within the Burford – Charlbury sub-area to take account of the fact that much of the sub-area falls within the environmentally sensitive Cotswolds Area of Outstanding Natural Beauty (AONB).</u></p> <table data-bbox="996 1193 1523 1337"> <tr> <td><u>Witney Sub-Area</u></td> <td><u>276</u></td> </tr> <tr> <td><u>Carterton Sub-Area</u></td> <td><u>238</u></td> </tr> <tr> <td><u>Chipping Norton Sub-Area</u></td> <td><u>188</u></td> </tr> </table>	<u>Witney Sub-Area</u>	<u>276</u>	<u>Carterton Sub-Area</u>	<u>238</u>	<u>Chipping Norton Sub-Area</u>	<u>188</u>
<u>Witney Sub-Area</u>	<u>276</u>								
<u>Carterton Sub-Area</u>	<u>238</u>								
<u>Chipping Norton Sub-Area</u>	<u>188</u>								

			<p><u>equates to 99% of the overall plan period requirement of 15,950 homes. Additional provision may also be made through Neighbourhood Plans. Housing delivery will be regularly monitored and should it become apparent that additional provision/measures are likely to be necessary to ensure the overall housing requirement to 2031 is met the Local Plan will be subject to review as appropriate.</u></p> <p><u><i>Five-Year Housing Land Supply</i></u></p> <p><u>5.34b With regard to 5-year housing land supply, the Council will apply the ‘Liverpool’ (residual) approach whereby the past backlog of housing ‘under-supply’ since the start of the plan period (2011) is delivered over the whole of the remaining plan period rather than in the immediate 5-year period which would be required under the alternative ‘Sedgefield’ methodology.</u></p> <p><u>5.34c Insufficient capacity has been identified through this Local Plan and the supporting assessment of housing land availability to deliver a 5-year supply under the Sedgefield approach and it could only be achieved by releasing a large number of sites that have been assessed by the Council as being unsuitable for new housing. The Council does not consider this to be an appropriate way forward. Addressing the shortfall in a more measured way over the remaining plan period using the Liverpool approach is considered to be entirely justified.</u></p> <p><u>5.34d In addition to the application of the Liverpool approach, the calculation of five year housing land supply will be based on a ‘staged’ housing requirement as set out in Policy H2 below. This approach applies a lower initial housing requirement of 550 dwellings per year from 2011/12 – 2020/2021, thereafter including an additional 275 homes per year for Oxford’s unmet need and gradually increasing up to a total combined annual requirement of 1,125 homes per year.</u></p> <p><u>5.34e The staged requirement is necessary in order to enable sufficient time for large strategic sites to start delivering. It should not be seen as a target and over-delivery against these targets, particularly in the early years, will be encouraged.</u></p> <p><u>5.34f Oxford’s unmet needs are set out separately in the phased requirement table for illustrative purposes only. As Policy H2 makes clear, housing supply and delivery will be</u></p>
--	--	--	--

			<p><u>assessed against the combined totals which will be derived from annual completions across the District. Thus, whilst it is anticipated that Oxford's unmet needs will be largely accommodated through delivery of the Oxfordshire Cotswolds Garden Village, the housing requirement is not disaggregated so that under or over supply at this location will not be treated separately when calculating the five year housing land supply.</u></p> <p>5.35 The Council's overall approach is summarised in Policy H2 below.</p>																				
MM10	MAIN30 FMM14	Policy H2 – Delivery of New Homes	<p><u>Policy H2 – Delivery of New Homes</u></p> <p>The Council will deliver at least 10,500 new homes in the period 2011 – 2031. This will be achieved through a combination of homes already completed, existing commitments, allocated Strategic Development Areas (SDAs) sites identified as suitable and deliverable/developable in the Council's SHLAA and windfall development.</p> <p><u>Provision will be made for at least 15,950 new homes in the period 2011 – 2031.</u></p> <p><u>This will include 13,200 homes in the period 2011 – 2031 to meet West Oxfordshire's housing needs and a further 2,750 homes in the period 2021 – 2031 to meet Oxford City's housing needs.</u></p> <p><u>The housing requirement will be phased over the plan period in accordance with the following table:</u></p> <table border="1"> <thead> <tr> <th><u>Year</u></th> <th><u>West Oxfordshire's Needs</u></th> <th><u>Oxford City's Needs</u></th> <th><u>Combined Annual Requirement</u></th> </tr> </thead> <tbody> <tr> <td><u>2011 - 2017</u></td> <td><u>550 per annum</u></td> <td></td> <td><u>550 per annum</u></td> </tr> <tr> <td><u>2017 – 2018</u></td> <td><u>550</u></td> <td></td> <td><u>550</u></td> </tr> <tr> <td><u>2018 – 2019</u></td> <td><u>550</u></td> <td></td> <td><u>550</u></td> </tr> <tr> <td><u>2019 – 2020</u></td> <td><u>550</u></td> <td></td> <td><u>550</u></td> </tr> </tbody> </table>	<u>Year</u>	<u>West Oxfordshire's Needs</u>	<u>Oxford City's Needs</u>	<u>Combined Annual Requirement</u>	<u>2011 - 2017</u>	<u>550 per annum</u>		<u>550 per annum</u>	<u>2017 – 2018</u>	<u>550</u>		<u>550</u>	<u>2018 – 2019</u>	<u>550</u>		<u>550</u>	<u>2019 – 2020</u>	<u>550</u>		<u>550</u>
<u>Year</u>	<u>West Oxfordshire's Needs</u>	<u>Oxford City's Needs</u>	<u>Combined Annual Requirement</u>																				
<u>2011 - 2017</u>	<u>550 per annum</u>		<u>550 per annum</u>																				
<u>2017 – 2018</u>	<u>550</u>		<u>550</u>																				
<u>2018 – 2019</u>	<u>550</u>		<u>550</u>																				
<u>2019 – 2020</u>	<u>550</u>		<u>550</u>																				

			<u>2020 – 2021</u>	<u>550</u>		<u>550</u>
			<u>2021 – 2022</u>	<u>525</u>	<u>275</u>	<u>800</u>
			<u>2022 - 2023</u>	<u>525</u>	<u>275</u>	<u>800</u>
			<u>2023 – 2024</u>	<u>700</u>	<u>275</u>	<u>975</u>
			<u>2024 - 2025</u>	<u>850</u>	<u>275</u>	<u>1125</u>
			<u>2025 – 2026</u>	<u>850</u>	<u>275</u>	<u>1125</u>
			<u>2026 – 2027</u>	<u>850</u>	<u>275</u>	<u>1125</u>
			<u>2027 – 2028</u>	<u>850</u>	<u>275</u>	<u>1125</u>
			<u>2028 - 2029</u>	<u>850</u>	<u>275</u>	<u>1125</u>
			<u>2029 – 2030</u>	<u>850</u>	<u>275</u>	<u>1125</u>
			<u>2030 - 2031</u>	<u>850</u>	<u>275</u>	<u>1125</u>
			<u>TOTALS</u>	<u>13,200</u>	<u>2750</u>	<u>15,950</u>
<p><u>The 5 year housing land supply is to be calculated on the basis of the phased requirement set out in this table. The additional requirement of 2,750 dwellings to meet Oxford City’s housing needs is set out separately for illustrative purposes but delivery and supply will be assessed against the combined annual requirement.</u></p> <p><u>When assessing the 5-year housing land supply the Council will apply the residual (Liverpool) approach with any under-supply (backlog) of housing to be delivered over the remaining plan period to 2031.</u></p> <p><u>The required level of housing delivery of at least 15,950 homes will be achieved through a combination of homes already completed, existing commitments, site allocations (strategic</u></p>						

			<p><u>and non-strategic sites) windfall development and any additional provision in Neighbourhood Plans.</u></p> <p><u>If, post adoption of the Local Plan, the phased housing requirement is consistently not delivered, or it becomes clear that this is likely to be the case during the remainder of the plan period, then the Council will undertake an early review of the plan. Such a review will consider up to date evidence on housing needs (including unmet needs from neighbouring authorities) and, if necessary, will allocate additional sites for housing.</u></p> <p><u>In determining future proposals for housing the Council will apply the following criteria depending on location.</u></p> <p><u>Proposals for housing will be determined as set out below:</u></p> <p><u>Main Service Centres, Rural Service Centres and Villages</u></p> <p>1. New dwellings will be permitted at the main service centres, rural service centres and villages in the following circumstances:</p> <ul style="list-style-type: none"> - On sites that have been allocated for housing development within a Local Plan or relevant neighbourhood plan; - On previously developed land within <u>or adjoining</u> the built up area provided it is not of high environmental value (e.g. ecology) and the loss of any existing use would not conflict with other plan policies <u>and the proposal complies with the general principles set out in Policy OS2 and any other relevant policies in this plan;</u> - <u>On undeveloped land within the built up area provided that the proposal is in accordance with the other policies in the plan and in particular the general principles in Policy OS2.</u> - On undeveloped land within or adjoining the built up area where <u>convincing evidence is presented to demonstrate that it the proposed development</u> is necessary to meet identified housing needs, and it is <u>in accordance with the distribution of housing set out in Policy H1 and is in accordance with consistent with the criteria in 2) below and</u> other policies in this the <u>plan in particular the general principles in Policy OS2.</u> <p><u>Small Villages, Hamlets and Open Countryside</u></p>
--	--	--	---

			<p>2. New dwellings will only be permitted in the small villages, hamlets and open countryside where they comply with the general principles set out in Policy OS2 and in the following circumstances:</p> <ul style="list-style-type: none"> - where there is an essential operational or other specific local need that cannot be met in any other way, including the use of existing buildings. Where appropriate, new homes provided (other than replacement dwellings) will be controlled by an occupancy condition linked to the operational need and/or to the 'rural exception site' approach for permanent affordable dwellings; - where residential development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of a heritage asset; - residential development of exceptional quality or innovative design; - new accommodation proposed in accordance with policies specifically for travelling communities; - accommodation which will remain ancillary to existing dwellings*; - replacement dwellings on a one for one basis; and - re-use of appropriate existing buildings which would lead to an enhancement of their immediate setting and where it has been demonstrated that the building is not capable of re-use for business, recreational or community uses, tourist accommodation or visitor facilities or where the proposal will address a specific local housing need which would otherwise not be met-: and - <u>on sites that have been allocated for housing development within an adopted (made) neighbourhood plan.</u> <p><u>General Principles</u></p> <p>3. Where acceptable in principle, all residential development will be expected to:</p> <p>Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality;</p> <p>Be of demonstrable benefit to the local community in which it is proposed;</p>
--	--	--	---

			<p>Avoid the coalescence and loss of identity of separate settlements</p> <p>Not have a harmful impact on the amenity of adjoining occupants;</p> <p>Where applicable, form a logical complement to the existing scale and pattern of development and/or the character of the area;</p> <p>Protect and where possible enhance the local landscape and setting of the settlement;</p> <p>Make use of previously developed land where available, provided it is not of high environmental value and the loss of any existing use would not conflict with other policies of this plan;</p> <p>Not involve the loss of an area of open space or any other feature that makes an important contribution to the character or appearance of the area;</p> <p>Be provided with safe vehicular access and safe and convenient pedestrian access to supporting services and facilities;</p> <p>Not be at risk of flooding or be likely to increase the risk of flooding elsewhere;</p> <p>Comply with policies for the protection of the natural environment and heritage assets;</p> <p>Ensure it does not lead to the sterilisation of a mineral resource;</p> <p>-Comply with national policies for Green Belt and AONB where applicable; and</p> <p>Provide all necessary supporting infrastructure including access to superfast broadband.</p> <p><i>* Proposals for extensions or alterations to an existing dwelling to create a self-contained unit of accommodation may be subject to a condition ensuring the accommodation remains ancillary to the main dwelling.</i></p>
--	--	--	--

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM11	MAIN33 FMM18	Policy H3 – Affordable Housing	<p><u>Policy H3 – Affordable Housing</u></p> <p>In order to address identified affordable housing needs, the Council will require ‘qualifying’ market housing schemes to make an appropriate contribution towards the provision of affordable housing within the District.</p> <p>Small scale developments of 1 – 5 units will not be required to contribute.</p> <p>Within the Cotswolds AONB, medium-scale housing schemes of 6-10 units and with which <u>have</u> a maximum <u>combined</u> gross floorspace of <u>no more than</u> 1,000m² or less will be required to make a financial contribution towards the provision of affordable housing off-site within the District. This commuted sum will be deferred until completion of the development to assist with viability.</p> <p>Outside of the Cotswolds AONB, medium-scale housing schemes of 6-10 units and with a maximum gross floorspace of 1,000m² or less will not be required to make a financial contribution towards affordable housing.</p> <p>Across the District as a whole, larger-scale housing schemes of 11 or more units and/or with <u>or which have</u> a <u>maximum combined</u> gross floorspace of more than 1,000m² will be required to provide affordable housing on-site as a proportion of the market homes proposed as follows:</p> <ul style="list-style-type: none"> - High value zone (50%) - Medium value zone (40%) - Low value zone (35%) <p><u>The following levels of affordable housing provision will be applied in relation to sheltered housing and extra-care housing:</u></p> <p><u>Sheltered Housing</u></p>

			<p><u>- High value zone (50%)</u></p> <p><u>- Medium value zone (40%)</u></p> <p><u>- Low value zone (35%)</u></p> <p><u>Extra-Care Housing</u></p> <p><u>- High value zone (45%)</u></p> <p><u>- Medium value zone (35%)</u></p> <p><u>- Low value zone (10%)</u></p> <p>In circumstances where it can be demonstrated that the level of affordable housing being sought would make a scheme unviable, a revised mix and type of housing will be considered before a lower level of affordable housing provision is accepted. Where external funding is available it may be applied to schemes to ensure affordability of rental levels or to increase the number or to change tenure or type of homes to meet priority needs.</p> <p>Affordable housing mix and tenure will be responsive to identified local needs and site specific opportunities. A financial contribution for the provision of affordable housing on other sites in West Oxfordshire in lieu of on-site provision may be appropriate if it can be demonstrated that:</p> <ul style="list-style-type: none"> - It is not physically possible or feasible to provide affordable housing on the application site; or - There is evidence that a separate site would more satisfactorily meet local housing need and contribute to the creation of mixed communities. <p>In some instances, a combination of on-site provision and a financial contribution may be appropriate.</p> <p>West Oxfordshire District Council and its partners will work with Parish Councils, Registered Providers of affordable housing and local housing, community land and self-build trusts to identify additional suitable rural sites for small scale affordable housing schemes to meet specific local housing needs which cannot be met in any other way. All new homes on these sites will remain affordable in perpetuity to people in housing need who have a local</p>
--	--	--	--

			<p>connection with the parish or appropriate adjoining parishes. Sites will be well-related to the existing built-up areas of towns and villages. Where family homes are proposed priority will be given to locations within a reasonable walking distance of a primary school.</p> <p><u>The Council will consider the inclusion of an element of market housing in rural exception sites (RES) provided it is demonstrated to be necessary to delivery (e.g. by subsidising the affordable element). In such cases, any market housing would be expected to be a subsidiary element of a predominantly affordable housing scheme.</u></p>
MM12	MAIN39 FMM21	Policy H4 – Type and Mix of New Homes	<p><u>Policy H4 – Type and Mix of New Homes</u></p> <p>All residential developments will be required to provide or contribute towards the provision of a good, balanced mix of property types and sizes.</p> <p>Developers will be required to demonstrate how their proposal would help create a more balanced housing stock within the District and meet the needs of a range of different groups having regard to specific local needs.</p> <p>Particular support will be given to proposals for specialist housing for older people including but not restricted to, extra-care housing. Opportunities for extra care will be sought in <u>the main and rural</u> service centres and other locations with good access to services and facilities for older people.</p> <p>In recognition of the ageing population the Council will also require larger housing developments of <u>11-50</u> or more units to provide a percentage of <u>market-new</u> homes as accessible and adaptable housing <u>designed to meet Building Regulations Requirement M4(2) (formerly lifetime homes)</u>. This will be a matter for negotiation but as a minimum the Council will seek the provision of at least 25% of market and affordable homes to this standard.</p> <p>To support the anticipated increase in the number of people with disabilities (linked to the ageing population) the Council will require larger housing developments of <u>11-50</u> or more homes to provide a percentage of market and affordable homes as wheelchair <u>user-adaptable</u> dwellings <u>designed to meet Building Regulation Requirement M4(3). (formerly wheelchair accessible homes)</u> Again this <u>This</u> will be a matter for negotiation but as a minimum the Council will seek the provision of at least 5% of homes to this standard. (with a minimum of 1 unit) <u>Where wheelchair adaptable homes are provided they will be counted as contributing</u></p>

			<p><u>towards the 25% accessible and adaptable homes requirement.</u></p> <p>The provision of specialist housing for those with a disability will be supported in principle in accessible, sustainable locations subject to other policies in this plan. The District Council will work with the County Council and other relevant partners to identify suitable sites and opportunities.</p> <p><u>In recognition of the needs of households from the travelling communities who are no longer travelling, the Council will seek to ensure the provision of up to 24 additional pitches for non-travelling Gypsies and Travellers and up to 3 plots for Travelling Showpeople in the period to 2031. This will include consideration of all opportunities including within the strategic location for growth (SLG) and strategic development areas (SDAs) identified in the Local Plan.</u></p>
MM13	MAIN43 FMM24	Policy H7 – Travelling Communities	<p><u>Policy H7 – Travelling Communities</u></p> <p>New pitches/plots/sites for Gypsies, Travellers and Travelling Showpeople will be provided in accordance with identified needs by:</p> <p><u>West Oxfordshire will provide at least 5 pitches and 5 plots to meet the needs of Gypsies and Travellers and Travelling Showpeople respectively from 2016 – 2031.</u></p> <p><u>To help achieve a five-year housing land supply, additional provision will be made through:</u></p> <ul style="list-style-type: none"> <u>- Expansion and/or intensification of the existing Gypsy and Traveller sites for the provision of 1 -2 pitches.</u> <u>- Allocation of land at Cuckoowood Farm, Freeland for an expanded showpeople’s site to provide up to 6 plots (with 3 plots provided by 2021 and any remaining provision made beyond 2021).</u> <p><u>To further ensure the availability of adequate accommodation for travelling communities we will also:</u></p> <ul style="list-style-type: none"> - safeguarding existing sites - extending existing sites where appropriate <p><u>- consider the scope to include specific provision as part of the larger strategic development</u></p>

			<p><u>areas including in particular the Oxfordshire Cotswolds Garden Village.</u></p> <ul style="list-style-type: none"> - bringing forward new sites if required, either through planning permission or through the development plan process <u>including allocations in neighbourhood plans.</u> <p>New sites should meet the following criteria:</p> <ul style="list-style-type: none"> - be in or near existing settlements with safe and convenient access to local services and facilities, especially schools, shops and healthcare; - be well located to the highway and public transport network, as well as having safe and convenient vehicular, cycle and pedestrian access <u>to local services and facilities, especially schools, shops and healthcare;</u> - be of an appropriate <u>location and</u> scale not to have an adverse impact on environmental or heritage assets and the character and appearance of the surrounding area; - not conflict with the objectives of Green Belt or AONB designation; - not be located in areas at flood risk; and - be designed in accordance with Government’s Good Practice guidance
MM14	MAIN44	Policy H8 – Land at Cuckoowood Farm, Freeland	<p><u>Policy H8 - Land at Cuckoowood Farm, Freeland</u></p> <p><u>Land at Cuckoowood Farm, Freeland to accommodate up to 6 plots for showpeople as an extension to the existing showpeople’s site.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <ul style="list-style-type: none"> <u>a) provision of structural landscaping to comprise substantial boundary hedgerows and bunding on the western, northern and southern boundaries and a woodland/copse within the northern section of the site.</u> <u>b) provision of satisfactory vehicular access.</u> <u>c) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be</u>

			<p><u>designed to provide a biodiversity enhancement.</u></p> <p><u>d) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>e) provision of an area of open space, to include for children’s play.</u></p>
MM15	MAIN50 FMM26	Policy E1 – Land for Employment	<p>Policy E1 – Land for Employment</p> <p><i>Provision of New Employment Land</i></p> <p>Employment Development Land and Employment Sites are those which include predominantly office-based, industrial or storage and distribution activities (B class uses) or related sui generis uses. Including existing commitments, the following Employment Development Land provision is identified to meet employment needs:</p> <ul style="list-style-type: none"> - Witney <u>Sub-Area - 20ha18ha</u> to the west of Witney <u>including 10ha to be provided as part of the West Witney (North Curbridge) urban extension and 8ha within the existing employment area around Downs Road through existing commitments and previous Local Plan allocations.</u> - Carterton <u>Sub-Area – 5ha-6ha including land</u> at West Oxon Business Park, and Land at Ventura Park <u>(4.5ha) and land east of Monahan Way (1.5ha)</u> with further consideration to be given to additional sites for employment use in appropriate locations. as required with the overall objective of securing an additional 10 hectares of employment land in a suitable, sustainable location or locations. - Chipping Norton <u>Sub-Area - at least 4.5 hectares and up to 7.3 hectares of employment land located on the eastern side of the town 5 hectares of employment land to be provided as part of the Land East of Chipping Norton Strategic Development Area (SDA).</u> - <u>Oxfordshire Cotswolds Garden Village – around 40 hectares of employment land in the form of a campus-style ‘science park’ to be taken forward through an Area Action Plan (AAP).</u> - Other Towns Villages and Rural Areas – At least 5ha within existing commitments with 2ha at Lakeside Standlake (previous Local Plan allocation). <p>The take up of land for employment will continue to be monitored and the need for further</p>

			<p>provision considered through Neighbourhood Plans and any future Local Plan review.</p> <p>Where justified, new employment allocations may be subject to an Article 4 Direction in the interests of safeguarding local employment opportunities. Proposals for new employment premises and sites may be subject to a condition limiting permitted development rights to protect the employment use.</p> <p><i>Existing Employment Sites</i></p> <p>Proposals to improve the effectiveness of employment operations on existing employment sites will be supported where commensurate with the scale of the town or village and the character of the area. This may include redevelopment, replacement buildings or the expansion of existing employment uses.</p> <p>Non-employment uses on employment sites will be resisted-refused except in the following circumstances:</p> <ul style="list-style-type: none"> - where it can be demonstrated that the site or premises are not reasonably capable of being used or redeveloped for employment purposes; or - where the site or premises are considered unsuitable on amenity, environmental or highway safety grounds for employment uses; or - where the proposed use includes community, leisure, or retail uses which are complementary and compatible to the functioning of the employment site and the local community, and conform with Policy E6 – Town Centres; or - where substantial community benefits would be achieved by allowing alternative forms of development.
MM16	MAIN52	Policy E2 – Supporting the Rural Economy	<p><u>Policy E2 - Supporting the Rural Economy</u></p> <p>New small employment sites in or adjacent to Service Centres and the Villages as listed in Table 4.1 will be supported where they are commensurate with the scale of the centre-of-village settlement and the character of the area.</p> <p>Elsewhere new and replacement buildings will be allowed where required for diversification</p>

			<p>proposals which are fully integrated with an existing farm business or where they meet a specific business need which cannot otherwise be met in a more sustainable location.</p> <p>Development proposals which are necessary for agricultural production or which make a positive contribution to farm or country estate diversification will be supported where they:</p> <ul style="list-style-type: none"> - are supported by or operate as part of and will continue to add value to a viable core farm/estate business; and - remain compatible and consistent in scale with the farm/estate operation and a countryside location; and - re-use existing buildings where feasible in accordance with Policy E3. <p><u>Any new building(s) must be suitably located for the scale and type of the proposed use and have regard to the level of accessibility to settlements, facilities and services and impact on the character and amenity of the area.</u></p> <p>Farm shops will be permitted where they form part of a diversification scheme to sell produce from the farm or farms in the immediate vicinity and do not demonstrably undermine the viability and vitality of shopping provision in existing villages. Conditions will be imposed to limit the proportion of goods from other sources.</p> <p>Development proposals for new or replacement buildings may be subject to a condition to safeguard their use in the interests of the local economy.</p> <p>The Council will seek to secure access to superfast broadband and improved mobile telecommunications in rural areas and subject to compliance with other relevant policies, will adopt a positive approach to well-designed proposals to facilitate homeworking and flexible working practices (such as live-work units) which maintain the amenity of existing residents. All new development will be required to demonstrate that the necessary infrastructure is in place or will be provided to enable access to superfast broadband.</p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM17	MAIN54	Policy E3 – Re-Use of Non-Residential Buildings	<p><u>Policy E3 - Re-use of Non-Residential Buildings</u></p> <p>The Council supports the re-use of traditional buildings for employment, tourism and community uses to support the rural economy where the following criteria are met:</p> <p>a) the existing form and design of the building(s) positively contribute to the character of the area, and;</p> <p>b) the building(s) are capable of conversion to the proposed use without necessitating alteration(s) or extension (s) which would harm the form of the original building and without removing features of historic, architectural or nature conservation interest, and;</p> <p>c) the building(s) are suitably located for the scale and type of the proposed use, having regard to the level of accessibility to settlements, facilities and services and impact on the character and amenity of the area.</p> <p>The re-use of non-traditional buildings including modern farm buildings, for employment, tourism and community uses will be supported within or adjoining Service Centres or Villages, or where it forms part of an agricultural holding and the proposal is part of a farm diversification scheme under Policy E2 or where re-use would address a specific local need which cannot be met in an alternative way. This is provided that the following criteria are met:</p> <p>a d) the general character and form of the building(s) are not harmful to the surroundings; and</p> <p>b e) the scale and type of use is suitable to its location and will not result in excessive alteration(s) or extension(s) to the host building.</p>

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM18	MAIN55 FMM27	Policy E4 – Sustainable Tourism	<p><u>Policy E4 – Sustainable Tourism</u></p> <p>Tourism and leisure development which utilises and enriches the natural and built environment and existing attractions of West Oxfordshire to the benefit of visitors and local communities will be supported.</p> <p>New tourist and visitor facilities should be located within or close to Service Centres and Villages and reuse appropriate existing buildings wherever possible. In small villages, hamlets and the open countryside, new tourism and visitor facilities may be justified in the following circumstances:</p> <ul style="list-style-type: none"> • where there is a functional linkage with a particular countryside attraction; or • <u>the nature of the tourist and visitor facility is such that it could not reasonably be located within or close to Service Centres and Villages; or</u> • to secure the diversification of a farm enterprise or country estate in accordance with Policy E2; or • the proposal will re-use an appropriate building in accordance with Policy E3 <p>Subject to specific locational or functional requirements, the town centre first approach will be applied to tourism and leisure development, including hotels.</p> <p>Proposals in the Cotswolds AONB should conserve <u>and enhance</u> the landscape quality and biodiversity of the area and support the objectives of the Cotswolds AONB Management Plan and Sustainable Tourism Strategy.</p> <p>In the Lower Windrush Valley the Council will continue to work with the Lower Windrush Valley Project and <u>the</u> County <u>Council as</u> Minerals <u>Planning</u> Authority to identify appropriate opportunities for tourism and leisure development. Proposals which complement the rural character of the area and deliver comprehensive long term recreational access, community or</p>

			<p>nature conservation benefits will be supported.</p> <p>The Council, working in partnership with other organisations, will support tourism and leisure proposals which are sensitive to and where appropriate possible enhance the ecological, landscape and heritage value of the River Thames. The provision or extension of permanent base moorings and associated facilities will be allowed in suitable locations off the main river channel, provided these do not harm the ecological, landscape or heritage value of the river and provide an enhancement where possible.</p>
MM19	FMM29	Policy E5 – Local Services and Community Facilities	<p><u>Policy E5 - Local Services and Community Facilities</u></p> <p>The Council will support the development and retention of local services and community facilities to meet local needs and to promote social wellbeing, interests, interaction and healthy inclusive communities.</p> <p>Proposals <u>Development proposals</u> that would result in the loss of community facilities and services will only be supported where it can be clearly shown that:</p> <ul style="list-style-type: none"> • appropriate alternative provision of at least equivalent suitability and accessibility, particularly by foot, will remain, and or; • in the case of pubs, shops and other commercially run services and facilities, the existing use is no longer viable and is incapable of being made viable or adapted to retain a viable service or facility including as a community run enterprise. A robust marketing exercise will be required to demonstrate that the use or premises is unviable in accordance with separate guidance published by the Council. <p>In considering <u>development proposals for</u> the loss of local services and community facilities, the Council will have regard to whether a site or facility is registered as an Asset of Community Value.</p>

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM20	FMM30	Paragraphs 6.71 – 6.72a	<p>6.71 The main centres are supported by a number of smaller town, village and neighbourhood shopping centres. The historic market towns of Burford and Woodstock <u>are designated rural service centres and</u> have a relatively large number of shops and facilities for their size reflecting their historic and tourist roles. <u>Like the three main service centres, Burford and Woodstock therefore have defined Town Centre boundaries.</u></p> <p>6.72 All of these centres are potentially vulnerable to out of centre proposals and changing consumer habits. Our objective is to <u>protect their vitality and viability in line with national policy and to</u> ensure continued investment in the town centres to enhance their shopping and leisure offer to meet residents’ and visitor needs. <u>This will be achieved primarily through the application of Policy E6 below.</u></p> <p><u>6.72a The other rural services within the District including Eynsham, Charlbury, Long Hanborough and Bampton whilst playing an important role in serving the day to day needs of local communities are more modest in nature, sporadic in form and less well-defined. This is also likely to be the case for the proposed Garden Village which will form a new rural service centre once established. The services and facilities within these centres are therefore protected through Policy E5 in recognition of their local role and the importance of retaining the existing level and variety of services and facilities. Attempts to define boundaries more precisely may result in peripheral sections affording no protection and therefore this is not an appropriate approach.</u></p>
MM21	MAIN56 FMM31 FMM32	Paragraphs 6.80 – 6.84	<p>6.80 Primary and secondary shopping frontages have been defined in Witney, Carterton and Chipping Norton <u>which form the Primary Shopping Area</u>. Primary shopping frontages have a high proportion of shops and are core frontages to protect to <u>and</u> maintain the attractiveness and coherence of the centres. Where permission is required we will resist <u>refuse</u> the loss <u>change of use</u> of shops in these areas <u>unless the criteria listed in Policy E6 can be met in full.</u></p>

			<p>6.81 As the trend in ‘remote working’ is predicted to increase, there is an opportunity for the town centres of Witney, Carterton and Chipping Norton to cater for those working remotely by providing spaces such as cafes, coffee houses, libraries and more flexible shared spaces. This will help ensure the town centres are more resilient to changing work practices.</p> <p>6.82 In recognition of the importance of complementary uses in town centres, secondary shopping frontages have been designated to support shops and other uses which complement the shopping and leisure role of town centres including cafes, restaurants and other leisure and cultural uses including those that support the evening economy in appropriate locations. However, care will be taken to avoid excessive concentrations of single uses that could cause amenity issues and affect the vitality of the area. Together these frontages form the primary shopping area. Together these frontages form the primary shopping area, which reduce variety and could cause amenity issues and affect the vitality of the area. <u>In assessing whether proposals result in an excessive concentration of uses, these will be considered on a case by case basis by evaluating the context of the area, including the current mix of uses in the locality, the character and sensitivities of the street scene and built environment and the relationship between the buildings. Proposals should be considered against the relevant policies within this plan, with particular reference to Policy OS4 (High Quality Design) and Policy EH7 (Historic Environment).</u></p> <p>6.83 Burford and Woodstock are smaller centres where the defined town centres encapsulate the primary shopping area and the definition of primary and secondary frontages is not appropriate. The change of use loss of shops and other town centre uses will be refused resisted throughout these town centres where permission is required, <u>unless the criteria listed within Policy E6 can be met in full. Care should also be taken to avoid excessive concentrations of single uses within these centres.</u></p> <p>6.84 The Council will continue to work with communities to promote and enhance the attractiveness of all town centres addressing, where possible, issues of publicity, security, parking and accessibility, and improvements to the public realm. <u>Enhancing</u></p>
--	--	--	--

			<p><u>the character and improving the environment of town centres is an important part of strengthening their role. The older town centres in West Oxfordshire have distinct and historic characters, strongly influenced by Cotswold building designs and materials, and by their roles as market towns. The conservation, enjoyment and enhancement of their historic environment is a significant consideration.</u></p>
MM22	FMM33	Policy E6 – Town Centres	<p><u>Policy E6 - Town Centres</u></p> <p>Town centres will be supported as the focus for shopping, leisure, community facilities and services. The Council will work with local businesses, residents, parish and town councils to ensure town, village and neighbourhood centres remain vibrant, accessible and meet local needs.</p> <p>The following town centres are defined on the proposals map:</p> <p>Principal town centre – Witney Primary town centres – Carterton, Chipping Norton Town centres with a significant tourist role – Burford, Woodstock</p> <p>The Council will apply the sequential and impact tests set out in the National Planning Policy Framework to new shopping and other town centre development proposals, <u>including office development</u>. Impact assessments will be required for significant proposals (over 500m2 net sales floorspace) where they are not in a centre or in accordance with a local or neighbourhood development plan.</p> <p>Primary and secondary shopping frontages are defined on the proposals map in Witney, Carterton and Chipping Norton.</p> <p>Within primary shopping frontages the change of use development resulting in the loss of shops (A1 use) will be <u>refused unless the criteria set out in this policy can be met in full.</u> resisted.</p> <p>Within secondary shopping frontages, <u>development proposals for</u> shops and other town</p>

			<p>centre uses, such as restaurants or cafes, will be allowed where they would complement and enhance the shopping offer of the defined shopping frontage. The Development resulting in the <u>loss of town centre uses in these frontages will be refused unless the criteria set out in this policy can be met in full.</u> resisted and excessive concentrations <u>Concentrations</u> of single uses will not be allowed where this would be likely to cause issues of amenity or affect the vitality of the area.</p> <p>In the town centres of Burford and Woodstock <u>development resulting in the loss of shops and other town centre uses will be resisted</u> <u>refused unless the criteria set out in this policy can be met in full.</u> <u>Concentrations of single uses will not be allowed where this would be likely to cause issues of amenity or affect the vitality of the area.</u></p> <p>Where <u>development resulting in the loss of shops or other</u> town centre uses is proposed contrary to this policy it will need to be <u>satisfactorily demonstrated that:</u></p> <ul style="list-style-type: none"> • <u>through following</u> a robust marketing exercise that the site or premises are not reasonably capable of being used or redeveloped for these uses; or • that the alternative use will positively contribute to the function, vitality and viability of the town centre. <p>The Council will work in partnership to promote and enhance the attractiveness of all town centres addressing where possible issues of publicity, security, parking and accessibility. Improvements to the public realm will be sought through high design standards which will apply to all town centre development.</p> <p>Development proposals which significantly increase car parking demand in our town centres will be expected to make appropriate public car parking provision or equivalent financial contributions <u>in accordance with Policy T4 (Parking Provision) of this plan.</u></p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM23	MAIN59	Policy T1 – Sustainable Transport	<p><u>Policy T1 – Sustainable Transport</u></p> <p>Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.</p> <p>In addition to this;</p> <ul style="list-style-type: none"> - All new development will be designed to maximise opportunities for walking, cycling and the use of public transport, ensure the safe movement of vehicles and minimise the impact of parked and moving vehicles on local residents, business and the environment - To promote increased home working and telecommuting, all new residential and commercial developments will be required to make provision for superfast broadband. - Mixed-use developments will be supported in principle in accessible, sustainable locations subject to compliance with other relevant local plan policies. <p>Proposals for new developments that have significant transport implications either in themselves or in combination with other proposals will be required to include a Transport Assessment (TA), and where necessary a travel plan, in accordance with County Council requirements.</p>
MM24	MAIN64 FMM38	Policy T2 – Highway Improvement Schemes	<p><u>Policy T2 – Highway Improvement Schemes</u></p> <p>All development will be required to demonstrate safe access and an acceptable degree of impact on the local highway network.</p> <p>Development proposals that are likely to generate significant amounts of traffic, shall be supported by a Transport Assessment (TA) and where appropriate, a Travel Plan.</p>

			<p>Where necessary to mitigate the impact of development and support planned growth, contributions will be sought from new development towards new and/or enhanced highway infrastructure either directly as part of the development or in the form of an appropriate financial contribution.</p> <p>The following strategic highway infrastructure schemes are proposed to be safeguarded and delivered as part of the committed and allocated urban extensions identified in this Local Plan:</p> <ul style="list-style-type: none"> - Downs Road junction, Witney - Shores Green Slip Roads, Witney - West End Link Road, Witney - Northern Distributor Road, Witney - <u>Eastern Link Road, Chipping Norton</u> - <u>Western Spine Road, Eynsham</u> <p><u>The Council will identify and safeguard necessary strategic highway improvements associated with the Oxfordshire Cotswolds Garden Village through the Area Action Plan (AAP) process.</u></p> <p>The Council will continue to support the provision of A-road access to Carterton via the B4477 together with the provision of west facing slip roads at the junction of the A40 and B4477. Contributions will be sought from new development as appropriate.</p> <p>The Council will continue to work in partnership with Oxfordshire County Council in relation to securing improvements to the A40 between Eynsham and Oxford including the potential provision of a new park and ride site at Eynsham and associated bus priority measures.</p> <p><u>The Council will continue to work in partnership with Oxfordshire County Council in relation to securing improvements to the A40 between Witney and Oxford. This will include the provision of an eastbound bus lane in conjunction with the proposed park and ride at Eynsham to help address congestion in the short to medium term, together with longer term improvements including the provision of a westbound bus lane from Oxford to Eynsham and dualling of the A40 between Witney and Eynsham.</u></p>
--	--	--	--

			<p>Contributions will be sought from new development and other potential sources of funding as appropriate.</p> <p>In addition, the Council will work in partnership with the County Council to deliver other ‘non-strategic’ highway improvements necessary to support the quantum and distribution of growth identified in the Local Plan with contributions to be sought from new development as appropriate.</p>
MM25	MIN51	Policy T3 – Public Transport, Walking and Cycling	<p>Policy T3 – Public Transport, Walking and Cycling</p> <p>All new development will be located and designed to maximise opportunities for walking, cycling and the use of public transport.</p> <p>Where opportunities for walking, cycling and using public transport are more limited, other measures will be sought to help reduce car use as appropriate (e.g. measures to promote home working or the opportunity for linked trips e.g. through mixed-use development). New development will be expected to contribute towards the provision of new and/or enhanced public transport, walking and cycling infrastructure to help encourage modal shift and promote healthier lifestyles with particular regard to be given to safe and convenient routes to school.</p> <p>Development that fails to make adequate provision of measures to encourage the use of non-car modes of transport will not be favourably considered.</p> <p>West Oxfordshire District Council will continue to work in partnership with the highway authority, developers, local councils, bus and rail operators and other voluntary and community sector organisations, to:</p> <ul style="list-style-type: none"> - Increase the use of bus, rail and community transport through the provision of improved services, facilities and information including specific schemes identified in the Local Transport Plan (Connecting Oxfordshire), the and IDP and the draft Rail and Bus Strategies for Oxfordshire; and - Provide safe and convenient travel within and between the network of towns and villages in West Oxfordshire, particularly for pedestrians, cyclists and other vulnerable road users, users

			of public and community transport including specific schemes identified in the Local Transport Plan and IDP
MM26	FMM40	Policy EH1a – Cotswolds Area of Outstanding Natural Beauty	<p><u>Policy EH1a - Cotswolds Area of Outstanding Natural Beauty</u></p> <p><u>In determining development proposals within the Cotswolds Area of Outstanding Natural Beauty (AONB) and proposals which would affect its setting, great weight will be given to conserving and enhancing the area’s natural beauty, landscape and countryside, including its wildlife and heritage. This will include consideration of any harm to the contribution that the settlement makes to the scenic beauty of the AONB. The Cotswolds Conservation Board’s Management Plan and guidance documents are material considerations in decision making relevant to the AONB.</u></p> <p><u>Major development will not be permitted within the AONB other than in exceptional circumstances, as required by national policy and guidance.</u></p> <p><u>Proposals that support the economy and social wellbeing of communities located in the AONB, including affordable housing schemes and small scale renewable energy development, will be supported, provided they are consistent with the great weight that must be given to conserving and enhancing the landscape and natural scenic beauty of the area.</u></p>
MM27	FMM41	Policy EH1 - Landscape Character	<p><u>Policy EH1 - Landscape Character</u></p> <p>The quality, character and distinctiveness of West Oxfordshire’s natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity, will be conserved and enhanced.</p> <p>New development should <u>conserve respect</u> and, where possible, enhance the intrinsic character, quality and distinctive natural and man-made features of the local landscape, including individual or groups of features and their settings, such as stone walls, trees, hedges, woodlands, rivers, streams and ponds. Conditions may be imposed on development proposals to ensure every opportunity is made to retain such features and ensure their long-term survival through appropriate management and restoration.</p>

			<p>Proposals which would result in the loss of features, important for their visual, amenity, or historic value will not be permitted unless the loss can be justified by appropriate mitigation and/or compensatory measures which can be secured to the satisfaction of the Council.</p> <p>When determining development proposals within or impacting upon the Cotswolds Area of Outstanding Natural Beauty, great weight will be given to the conservation of the area's landscape and scenic beauty.</p> <p><u>Proposed development should avoid causing pollution, especially noise and light, which has an adverse impact upon landscape character and should incorporate measures to maintain or improve the existing level of tranquillity and dark-sky quality, reversing existing pollution where possible.</u></p> <p>Special attention and protection will be given to the landscape and biodiversity of the Lower Windrush Valley Project, the Windrush in Witney Project Area and the Wychwood Project Area.</p>
--	--	--	--

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM28	MAIN69 FMM42	Paragraphs 8.21 – 8.23	<p>8.21 Development proposals affecting or related to these and other ecologically important areas will be expected to ensure that any potential harm is avoided. However in exceptional cases when harm cannot be avoided then the proposed works will need to be fully mitigated and compensated in order to include enhancements. Some potential areas of improvement are identified in the Infrastructure Delivery Plan (IDP). In order to ensure there is no net loss to biodiversity, the incorporation of biodiversity in and around developments will be a requirement. Development proposals directly or indirectly affecting these and other ecologically important areas will need to be appropriately assessed and follow the mitigation hierarchy of avoidance, mitigation and compensation. As such, developments will be expected to ensure that any potential harm is avoided. However in exceptional cases when harm cannot be avoided, then the impact on biodiversity will need to be fully mitigated, and only as a last resort, compensated. Some potential areas of improvement are identified in the Infrastructure Delivery Plan (IDP). In order to ensure there is a net gain in biodiversity, the enhancement of biodiversity within developments will be a requirement, for example, habitat creation and provision of features for species.</p> <p>8.22 Only when all methods of avoidance and on-site mitigation have been fully explored and proven to the LPA that they cannot be satisfactorily achieved on site will biodiversity offsetting be considered for an exceptional development case. Biodiversity offsetting is a mechanism used to secure compensation for the impacts of a development by creating or restoring for the creation or restoration of important habitats elsewhere. Not all habitats, however, can be re-created; ancient woodland, for example, is irreplaceable, having evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. Development proposals must clearly demonstrate that an overall net gain in biodiversity is being achieved. The established method for measuring this is through the use of a metric (or Biodiversity Impact Assessment calculator) based on that described in DEFRA Biodiversity Offsetting guidance or a suitably amended and recognised version.</p>

			<p>8.23 <u>In addition to the more strategic approach to habitat enhancement and creation, there are relatively small measures that can be undertaken through the development process that cumulatively will bring benefits for biodiversity, including incorporating integral bird and bat boxes, such as planting of native trees, shrubs and wildflowers and providing wildlife friendly landscaping such as green walls, roofs and balconies. In addition to the more strategic approach to habitat enhancement and creation, there are relatively small measures that can be undertaken through the development process that cumulatively will bring benefits for biodiversity, including incorporating integral bird and bat boxes into buildings, such as planting native trees, shrubs and wildflowers, planting ornamental plants with recognised wildlife value and providing wildlife friendly landscaping such as green walls, roofs and balconies. 'Biodiversity and Planning in Oxfordshire' (2014) provides valuable information, guidance and best practice for developers on a range of biodiversity issues.</u></p>
MM29	MAIN70 FMM43	Policy EH2 – Biodiversity and Geodiversity	<p><u>Policy EH2 - Biodiversity and Geodiversity</u></p> <p>The biodiversity of West Oxfordshire shall be protected and enhanced to achieve an overall net gain in biodiversity <u>and minimise impacts on geodiversity</u>, including by:</p> <ul style="list-style-type: none"> - giving sites and species of international nature conservation importance and nationally important sites of special scientific interest the highest level of protection from any development that will have an adverse impact; - requiring a Habitats Regulation Assessment to be undertaken of any development proposal that is likely to have a significant adverse effect, either alone or in combination, on the Oxford Meadows SAC, particularly in relation to air quality and nitrogen oxide emissions and deposition; - protecting and mitigating for impacts on priority habitats, and protected species and <u>priority species, both for</u> their importance individually and as part of a wider network; - avoiding loss, deterioration or harm to locally important wildlife and geological sites and sites supporting irreplaceable habitats (including ancient woodland, <u>Plantations on Ancient Woodland Sites</u> and aged or veteran trees), UK priority habitats and priority species, except in exceptional circumstances where the importance of the development significantly and

			<p>demonstrably outweighs the harm and the harm can be mitigated through appropriate measures and a net gain in biodiversity is secured;</p> <ul style="list-style-type: none"> - ensuring development does not prevent the achievement of works towards achieving the aims and objectives of the Conservation Target Areas (CTAs) <u>and Nature Improvement Areas (NIAs)</u>; - promoting the preservation <u>conservation</u>, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, particularly within the CTAs <u>and NIAs</u>; - taking all opportunities to enhance the biodiversity of the site or the locality, especially where this will help deliver networks of biodiversity and green infrastructure and UK priority habitats and species targets and meet the aims of Conservation Target Areas <u>CTAs</u>; - <u>ensuring that all applications that might adversely affect biodiversity are accompanied by adequate ecological survey information in accordance with BS 42020:2013 unless alternative approaches are agreed as being appropriate with the District Council's ecologist;</u> - <u>all major and minor applications demonstrating a net gain in biodiversity where possible. For major applications this should be demonstrated in a quantifiable way through the use of a Biodiversity Impact Assessment Calculator (BIAC) based on that described in the DEFRA Biodiversity Offsetting guidance or a suitably amended version. For minor applications a BIAC will not usually be required but might be requested at the Council's discretion;</u> - <u>all development incorporating biodiversity enhancement features.</u> <p>All developments will be expected to provide towards the provision of necessary enhancements in areas of biodiversity importance.</p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM30	FMM44	Policy EH3 – Public Realm and Green Infrastructure	<p><u>Policy EH3 – Public Realm and Green Infrastructure</u></p> <p>The existing areas of public space and green infrastructure assets of West Oxfordshire will be protected and enhanced <u>for their multi-functional role, including their biodiversity, recreational, accessibility, health and landscape value and for the contribution they make towards combating climate change.</u></p> <p>and new multi-functional areas of space will be created to achieve improvements to the network (through extending spaces and connections and/or better management), particularly in areas of new development and/or where stakeholder/partnership projects already exist or are emerging.</p> <p>Public realm and publicly accessible green infrastructure network considerations should be integral to the planning of new development.</p> <p>New development should:</p> <ol style="list-style-type: none"> I. not result in avoid the loss, fragmentation loss of functionality of the existing green infrastructure network, including within the built environment, such as access to waterways, unless it can be demonstrated that replacement provision can be provided which will improve the green infrastructure network in terms of its quantity, quality, accessibility and management arrangements. II. Development proposals will be expected provide opportunities for necessary improvements to the District’s multi-functional network of green infrastructure (including Conservation Target Areas) and open space, <u>(through for example extending spaces and connections and/or better management), particularly in areas of new development and/or where stakeholder/partnership projects already exist or are emerging, in accordance with the Council’s Green Infrastructure Plan, its Open Spaces Strategy, Playing Pitch Strategy, Living</u>

			<p><u>Landscape Schemes, locally identified Nature Improvement Areas and any future relevant plans (such as Neighbourhood Plans) and programmes as appropriate,</u></p> <p>III. providing provide opportunities for walking and cycling within the built-up areas and connecting settlements to the countryside through a network of footpaths, bridleways and cycle routes</p> <p><u>IV. maximise opportunities for urban greening such as through appropriate landscaping schemes and the planting of street trees</u></p> <p><u>V. consider the integration of green infrastructure into proposals as an alternative or to complement 'grey infrastructure' (such as manmade ditches and detention ponds and new roads)</u></p> <p><u>VI. demonstrate how lighting will not adversely impact on green infrastructure that functions as nocturnal wildlife movement and foraging corridors.</u></p> <p><u>Contributions towards local green infrastructure projects will be sought where appropriate. If providing green infrastructure as part of a development, applicants should demonstrate how it will be maintained in the long term.</u></p> <p>New development should not result in the loss of open space, sports and recreational buildings and land unless up to date assessment shows the asset is surplus to requirements or the need for and benefits of the alternative land use clearly outweigh the loss and equivalent replacement provision is made. Where appropriate, development will be expected to provide or contribute towards the provision of necessary improvements to open space, sports and recreational buildings and land*.</p> <p>* Regard will be had to the Open Space Study (2013) and Playing Pitch Strategy (2014) for West Oxfordshire</p>
--	--	--	--

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM31	FMM45	Policy EH3a – Sport, Recreation and Children’s Play	<p><u>Policy EH3a – Sport, Recreation and Children’s Play</u></p> <p><u>New development should not result in the loss of open space, sports and recreational buildings and land unless up to date assessment shows the asset is surplus to requirements or the need for and benefits of the alternative land use clearly outweigh the loss and equivalent replacement provision is made. Where appropriate, development will be expected to provide, or contribute towards the provision of necessary improvements to, open space, sports and recreational buildings and land*.</u></p> <p><u>* Regard will be had to the Open Space Study (2013) and Playing Pitch Strategy (2014) for West Oxfordshire</u></p>
MM32	MAIN73 FMM48	Policy EH4 - Decentralised and renewable or low carbon energy development	<p><u>Policy EH4 - Decentralised and renewable or low carbon energy development (excepting wind turbines)</u></p> <p><u>In principle, renewable and low carbon energy developments, especially small scale community led initiatives for wind schemes, solar clubs and the use of biomass will be supported. In principle, renewable and low-carbon energy developments, especially run-of-river hydropower and the use of biomass will be supported. Battery energy storage developments that aid the deployment of renewable and low carbon development across the wider electricity network will generally also be supported.</u></p> <p>Renewable or low-carbon energy development should be located and designed to minimise any adverse impacts, with particular regard to conserving the District’s high valued landscape and historic environment. In assessing proposals, the following local issues will need to be considered and satisfactorily addressed:</p> <ul style="list-style-type: none"> - impacts on landscape, biodiversity, historic environment, <u>agricultural land</u>, residential amenity, aviation activities, highway safety and fuel/energy security, including their

			<p>cumulative and visual impacts.</p> <ul style="list-style-type: none"> - opportunities for environmental enhancement. <u>Environmental enhancements, in addition to those required to mitigate and compensate any adverse impacts, will be sought, especially where they will contribute to Conservation Target Areas and Nature Improvement Areas;</u> - potential benefits to host communities (including job creation and income generation). <p><u>Any proposals for a solar farm involving best and most versatile agricultural land would need to be justified by the most compelling evidence which demonstrates why poorer quality land has not been used in preference to best and most versatile agricultural land.</u></p> <p><u>Developments that are led by or meet the needs of local communities will receive particular support when considering the merits of renewable energy developments. Applicants should submit a written agreement between the applicant and a community energy enterprise demonstrating that the benefits of all or part of the project will flow to the community for the lifetime of the project.</u></p> <p>The use of decentralised energy systems, including Combined Heat and Power (CHP) and District Heating (DH), especially woody biomass fuelled, will be encouraged in all developments.</p> <p>An energy <u>feasibility</u> assessment or strategy which assesses viability <u>and practicability</u> for decentralised energy systems, including consideration of the use of local wood fuel biomass and other renewable energy initiatives will be required for:</p> <ul style="list-style-type: none"> - proposals on strategic development areas (SDAs) - <u>all residential development for 100 dwellings or more</u> - all residential developments in off-gas areas for 50 dwellings or more. - all non-domestic developments above 1000m² floorspace <p><u>Where feasibility assessments demonstrate that decentralised energy systems are practicable and viable, such systems will be required as part of the development, unless an alternative solution would deliver the same or increased energy benefits.</u></p>
--	--	--	---

			<p><u>Detailed guidance on renewable and low carbon energy technologies in West Oxfordshire, which includes information on submission requirements, national policy considerations and good practice, is published in a West Oxfordshire Renewable and Low Carbon Energy Guidance and Landscape Capacity Study.</u></p>
MM33	MAIN75	Policy EH5 – Flood Risk	<p><u>Policy EH5 – Flood Risk</u></p> <p>Flood risk will be managed using the sequential, risk-based approach, set out in the National Planning Policy Framework, of avoiding flood risk to people and property where possible and managing any residual risk (taking account of the impacts of climate change).</p> <p>In assessing proposals for development:</p> <ul style="list-style-type: none"> - the Sequential Test and, if necessary, the Exception Test will be applied; - all sources of flooding (including sewer flooding and surface water flooding) will need to be addressed and measures to manage or reduce their impacts, onsite and elsewhere, incorporated into the development proposal; - appropriate flood resilient and resistant measures should be used; - sustainable drainage systems to manage run-off <u>and support improvements in water quality and pressures on sewer infrastructure</u> will be integrated into the site design, maximising their habitat value and ensuring their long term maintenance; - a site-specific flood risk assessment will be required for all proposals of 1ha or more and for any proposal in Flood Zone 2 and 3 and Critical Drainage Areas; - only water compatible uses and essential infrastructure will be allowed in a functional flood plain (Flood Zone 3b); - land required for flood management will be safeguarded from development and, where applicable, managed as part of the green infrastructure network, including maximising its biodiversity value.

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM34	MAIN77 FMM49	Policy EH6 – Environmental Protection	<p><u>Policy EH6 - Environmental Protection</u></p> <p>Proposals which are likely to cause pollution or result in exposure to sources of pollution or risk to safety, will only be permitted if measures can be implemented to minimise pollution and risk to a level that provides a high standard of protection for health, environmental quality and amenity. The following issues require particular attention:</p> <p><u>Air quality</u></p> <p>The air quality within West Oxfordshire will be managed and improved in line with National Air Quality Standards, the principles of best practice and the Air Quality Management Area Action Plans for Witney and Chipping Norton. <u>Where appropriate, developments will need to be supported by an air quality assessment.</u></p> <p><u>Contaminated land</u></p> <p>Proposals for development of land which may be contaminated must incorporate appropriate investigation into the quality of the land. Where there is evidence of contamination, remedial measures must be identified and satisfactorily implemented.</p> <p><u>Hazardous substances, installations and airfields</u></p> <p>Development should not adversely affect safety near notifiable installations and safeguarded airfields.</p> <p><u>Artificial light</u></p> <p>The installation of external lighting and <u>lighting</u> proposals for <u>new remote rural</u> buildings, <u>particularly those in remote rural locations</u>, will only be permitted where:</p> <p>i) the means of lighting is appropriate, unobtrusively sited and would not result in excessive levels of light;</p>

			<p>ii) the elevations of buildings, particularly roofs, are designed to limit light spill;</p> <p>ii) the proposal would not have a detrimental effect on local amenity, character of a settlement or wider countryside, intrinsically dark landscapes or nature conservation.</p> <p><u>Noise</u></p> <p>Housing and other noise sensitive development should not take place in areas where the occupants would experience significant noise disturbance from existing or proposed development.</p> <p>New development should not take place in areas where it would cause unacceptable nuisance to the occupants of nearby land and buildings from noise or disturbance.</p> <p><u>Water resources</u></p> <p>Proposals for development will only be acceptable provided there is no adverse impact on water bodies and groundwater resources, in terms of their quantity, quality and important ecological features.</p> <p><u>Waste</u></p> <p>Planning permission will be granted for appropriately located Proposals for development that makes provision for the management and treatment of waste and recycling will need to be, in accordance with the Oxfordshire Joint Municipal Waste Strategy Minerals and Waste Local Plan. and local waste management strategy.</p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM35	MAIN78 MAIN79 MAIN80 MAIN81 MAIN82 FMM50	Paragraphs 8.76 – 8.93	<p><u>Heritage Assets</u></p> <p>8.76 Features of heritage significance-interest including buildings, monuments, sites, places, areas and landscapes and their settings are referred to as ‘heritage assets’. <u>The heritage assets of West Oxfordshire are highly distinctive, possessing characteristics deriving from the history, geology and landform of the District, and together contributing to a strong and tangible sense of place. The assets take many forms: buildings and areas of built development, constructed of local limestone or ironstone and following local vernacular traditions; Conservation Areas, from well-preserved ‘wool’ market towns to small, dispersed villages; historic parks and gardens including nationally important 18th-century landscapes; and both above and below ground archaeological remains. The West Oxfordshire Design Guide, Landscape Assessment, Conservation Area Appraisals and Historic Landscape Characterisation studies provide further analysis of the District’s character.</u></p> <p>8.77—The heritage assets of West Oxfordshire are highly distinctive, possessing characteristics deriving from the history, geology and landform of the District, and together contributing to a strong and tangible sense of place. The assets take many forms: buildings and areas of built development, constructed of local limestone or ironstone and following local vernacular traditions; Conservation Areas, from well-preserved ‘wool’ market towns to small, dispersed villages; historic parks and gardens including nationally important 18th-century landscapes; and both above and below ground archaeological remains. The West Oxfordshire Design Guide, Landscape Assessment, Conservation Area Appraisals and existing and emerging Historic Landscape Characterisation studies provide further analysis of the District’s character.</p> <p>8.78—Designated heritage assets in West Oxfordshire include the Blenheim World Heritage Site, almost 3,200 Listed Buildings (2934 of Grades II interest, 211 Grade II* and 43 Grade I), 50 Conservation Areas, 149 Scheduled Monuments and 12 Registered Historic</p>

			<p>Parks and Gardens (see Figure 8.5). The significance of these assets is inherent in their designation, and some features of the assets form part of the designation record. Figure 8.6 shows the distribution of heritage assets within West Oxfordshire.</p> <p>8.77 Heritage assets may be classed as ‘designated’ or ‘non-designated’. Designated heritage assets have statutory protection and/or are a material planning consideration when determining planning applications. These and include Conservation Areas, Scheduled Monuments, and Listed Buildings and World Heritage Sites. Non-designated heritage assets, such as locally listed buildings, do not have statutory protection, but nonetheless represent a crucially important aspect of the District’s heritage, and play a defining role in the local character of an area.</p> <p>8.78 Designated heritage assets in West Oxfordshire include the Blenheim World Heritage Site, almost 3,200 Listed Buildings (2934 of Grades II interest, 211 Grade II* and 43 Grade I), 50 Conservation Areas, 149 Scheduled Monuments and 12 Registered Historic Parks and Gardens (see Figure 8.5). The importance of these assets is inherent in their designation, and some features of the assets form part of the designation record. Figure 8.6 shows the distribution of designated heritage assets within West Oxfordshire (but excludes listed buildings). These are all listed in the <u>Oxfordshire Historic Environment Record (HER)</u>.</p> <p>8.79 Non-designated heritage assets <u>do not have statutory protection, but nonetheless represent a crucially important aspect of the District’s heritage, and play a defining role in the local character of an area. Those non-designated heritage assets of particular local importance, e.g. those that make a fundamental contribution, both individually and collectively, to the distinctive and special character and appearance of the area in which they are located (in terms of their siting, design and use of materials) are known as ‘locally listed buildings’.</u> Many of these buildings have been identified within <u>conservation areas as part of Conservation Area Appraisals, taking account of a range of criteria, such as age, historic interest, building materials, architectural quality, original features of note and the contribution they make to their immediate and wider setting.</u> are features of the historic environment that make a fundamental contribution to the distinctive character and appearance of the area in which they are located (in terms of</p>
--	--	--	---

			<p>their siting, design and use of materials). Non-designated heritage assets contribute both individually and collectively to the special character and appearance of West Oxfordshire. Some will have been identified as locally listed buildings within conservation areas as part of Conservation Area Appraisals, taking account of a range of criteria, such as age, historic interest, building materials, architectural quality, original features of note and the contribution they make to their immediate and wider setting.</p> <p><u>8.79a</u> The Council’s rolling programme of undertaking further appraisals, along with for example those that come to light through planning applications, is likely to increase the number of locally listed buildings in the District. Details of non-designated assets, including non-scheduled archaeological sites, non-nationally important archaeological remains, non-listed buildings and non-Registered Historic Parks and Gardens, are held on the Oxfordshire Historic Environment Record (HER).</p> <p><u>Conserving and Enhancing the Historic Environment in West Oxfordshire</u></p> <p>8.80 Conserving and enhancing the historic environment is a critically important part of sustainable development <u>and a key element of this Local Plan</u>. Heritage assets - whether designated or non-designated - are irreplaceable features of the historic environment, whose effective conservation <u>and enhancement</u> delivers a wide range of social, cultural, economic and environmental benefits. At the national level there is a presumption that heritage assets will be protected-conserved and enhanced in a manner that is appropriate to their significance and also enjoyed for the quality of life they bring to current and future generations².</p> <p>8.81 This general principle of protection-conservation and enhancement will apply in West Oxfordshire. When considering development proposals there will therefore be a strong presumption in favour of protecting, sustaining and enhancing <u>the significance of</u> our heritage assets and their settings. The weight to be attached to that presumption, when assessed against meeting other needs, will be dependent on <u>a variety of factors, including:</u></p>
--	--	--	---

² Section 12 of the NPPF and national guidance, for example, from Historic England, Natural England and the Commission for Architecture and the Built Environment, are particularly relevant.

			<ul style="list-style-type: none"> • The significance of the heritage asset: whether it is a designated heritage asset (and its position in the hierarchy of designated assets) or a non-designated heritage asset; <u>and</u> • Its value in terms of its historic and architectural interest and appearance; and • The contribution of that part of the asset to be affected by the proposed development to the significance of the heritage interest, appearance and setting of the asset as a whole. <p>8.82 If the heritage asset is designated and has statutory protection, planning judgements will be set against the requirements of the relevant national legislation. If the heritage asset is non-designated, planning judgements will/ should be made on the basis of a thorough assessment of the historical and architectural interest, appearance and setting of the heritage asset.</p> <p><u>The Importance of Setting</u></p> <p>8.83 The setting of a heritage asset, i.e. the surroundings within which it is experienced, can be an important element of its significance. Views of and from an asset will contribute to this but setting is also influenced by other environmental factors such as noise, vibration, smell and lighting from other nearby land uses. The historic relationship between places can also influence the setting. For example, the buildings in Witney associated with the blanket industry and wool trade are not all visible from each other yet nonetheless have a historic connection that affects the significance of each. When assessing development proposals within the setting of a heritage asset, careful consideration must be given to the <u>effect on the significance of the asset(s), including the</u> implications of cumulative change.</p> <p><u>Determination of Planning Applications involving Heritage Assets</u></p> <p>8.84 In order to enable the Council to positively manage change by determining the appropriate balance between the need for any proposed development and the need to</p>
--	--	--	--

			<p>safeguard the heritage asset and its setting, developers will be required to analyse the significance of the asset, and of that part to be affected, and to provide detailed evidence to show that:</p> <ul style="list-style-type: none"> ▪ The proposals have been formulated and any works designed with a full and proper understanding of the significance of the heritage asset and its setting <u>and the effect of the proposals on that significance</u>; ▪ The heritage asset is being put to the optimum viable use consistent with its physical conservation, and the conservation of its character and setting; ▪ Opportunities to sustain, enhance, to better reveal or avoid or minimise harm to the significance of the asset have been taken; and ▪ The need to be met by the development could not be met in a more beneficial or less harmful way. <p>8.85 As a general principle, in assessing the impact of a proposed development on the significance of a heritage asset, the more important the asset, the greater the weight given to its conservation. <u>The optimum situation is for proposed development not to cause any harm to the significance of a heritage asset.</u> For designated heritage assets, all levels of harm, including total destruction, minor physical harm, and harm through change to setting should be avoided. Harm to designated heritage assets will should <u>only</u> be permitted only in exceptional circumstances, and would require a where there is clear and convincing justification <u>for that harm</u> on the grounds of public benefits that outweigh that harm. taking account of the great weight that must be given to conservation. <u>Planning judgements related to designated and non-designated assets will be made in accordance with national planning policy as set out in paragraphs 128 - 140 of the NPPF. In the event of an unavoidable conflict between development and harm, there will need to be a balancing exercise, assessing public benefits against harm. Even in these circumstances, the presumption is in favour of avoidance of harm to the asset.</u></p> <p>8.86 <u>In line with the NPPF, only in 'exceptional' circumstances should there be substantial</u></p>
--	--	--	---

			<p>harm to or loss of Grade II listed buildings and registered parks and gardens; and only in 'wholly exceptional' circumstances in the case of assets of the highest significance, including Grade I or II* listed buildings and registered parks and gardens, and Blenheim World Heritage Site. A separate policy on the Blenheim Palace World Heritage Site is set out in Section 9 (Policy EW1 applies).</p> <p>8.87 Substantial harm to, or total loss of, the significance of a designated asset should be avoided, and would only be approved in exceptional circumstances <u>(or wholly exceptional circumstances in the case of higher grade assets)</u>, and if substantial public benefits can be demonstrated that outweigh the harm or loss or all four tests set out in paragraph 133 of the NPPF can be met, <u>namely: (see footnote to Policy EH7):</u></p> <ul style="list-style-type: none"> • <u>the nature of the heritage asset prevents all reasonable uses of the site; and</u> • <u>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</u> • <u>conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and</u> • <u>the harm or loss is outweighed by the benefit of bringing the site back into use.</u> <p>A key factor in determining what constitutes substantial harm is if the adverse impact goes to the heart of why an asset is worthy of designation and, thus, special protection.</p> <p>8.88 New development in Conservation Areas and within the setting of heritage assets should preserve or enhance their setting, particularly those features which make a positive contribution to the character of the area and better reveal the significance of an asset.</p> <p>8.89 Information submitted in support of development proposals affecting heritage assets in West Oxfordshire should include reference, where available, to the 'historic environment record' including: statutory designations <u>National Lists of designated assets and their descriptions</u>; the Council's Conservation Area Appraisals and the West Oxfordshire Design Guide; <u>the County Historic Landscape Character Area Assessment</u>; known archaeological sites and monuments kept by the Oxfordshire County Council; local consultations, and detailed exploratory and survey work, including archaeological</p>
--	--	--	--

			<p>field evaluations and building recording, as appropriate. The amount of information to be provided should be proportionate to the significance of the asset and the degree of impact of the proposed development on that significance.</p> <p>8.90 Where permission is granted for development that would affect a heritage asset, conditions may be imposed to require a record to be made of the part of the asset to be affected, and of any archaeology or historic fabric revealed in the course of development. The record and any recovered archaeological artefacts will need to be maintained to contribute to knowledge and understanding of the asset.</p> <p><u>Stewardship of Heritage Assets – Securing their Upkeep</u></p> <p><u>8.90a In 2016 there were 12 higher grade heritage assets (2 place of worship and 10 archaeology entries) within the District identified on the Historic England Heritage at Risk Register as being at risk of being lost through neglect, decay or other threats (a reduction from 23 on the register in 2014). The Council will monitor buildings or other heritage assets at risk and proactively seek solutions.</u></p> <p>8.91 Policy EH7 summarises the Council’s overall approach to the District’s historic environment. (Policies OS2 and OS4 address the historic environment within the context of the Plan’s overall strategy.) Sustainable development means safeguarding and seeking improvements to the quality of this historic environment and its heritage assets for this and future generations. One of the best ways to secure the upkeep of many heritage assets is to keep them in active, viable and appropriate use, where this can be achieved without causing harm to the character, fabric or setting of the heritage asset, and where a positive contribution to local character and distinctiveness can be successfully maintained. This ‘constructive conservation approach’ requires a thorough understanding of what makes a site important, and collaborative working between the local authority, owners, local community, developers, architects and other specialists (such as Historic England), in order to manage change in the most appropriate way.</p> <p>8.92 The Council’s aim to conserve and enhance our historic environment and local distinctiveness, and to positively manage change, will be informed by a series of measures which will help to improve the understanding of the District’s historic environment. These include the review of the West Oxfordshire Design Guide, a</p>
--	--	--	---

			<p>programme of conservation area reviews, appraisals and management plans, the designation of new conservation areas where appropriate, and the identification of further non-designated heritage assets and the publication of local lists. Article 4 Directions will be used to protect areas where there is clear justification to introduce stricter controls.</p> <p><u>8.92a</u> Given the District’s rich historic environment, the Council has had many years of experience working positively and constructively with key partners, ranging from integrating major new development into environmentally sensitive sites (such as The Woolgate and Marriott’s Walk in Witney), through to guiding homeowners on alterations to their historic buildings. Early discussions at pre-application stage or in site allocation are an important component of this constructive approach and also help in identifying any information likely to be required in support of a proposal, including the preparation of a heritage statement.</p> <p><i>IN TEXT BOX:</i></p> <p><u>The Council’s aim to conserve and enhance the historic environment and local distinctiveness, and to positively manage change, will be delivered through a range of proactive measures to improve the understanding of the District’s historic environment, including:</u></p> <ul style="list-style-type: none"> <u>• a programme of Conservation Area Appraisals, reviews and management plans</u> <u>• designating new Conservation Areas where appropriate</u> <u>• finding solutions for those heritage assets at risk and reducing the number on the ‘Heritage at Risk’ Register</u> <u>• identifying further non-designated heritage assets, publishing local lists and keeping them under review</u> <u>• making information about the significance of the historic environment more publicly accessible</u> <u>• monitoring and updating the West Oxfordshire Design Guide SPD</u> <u>• making use of Article 4 Directions to protect areas where there is clear justification to introduce stricter controls</u> <u>• assisting in the implementation and monitoring of the Blenheim Palace World</u>
--	--	--	---

			<p><u>Heritage Site Management Plan</u></p> <p><u>8.93 Policy EH7 sets out the Council’s overall approach to the District’s historic environment. Policies EH8-EH14 relate to specific aspects and/or heritage assets of this environment. For each of these aspects or assets, development proposals will need to be considered against Policy EH7 as well as the relevant specific policy. (Policies for the sub-areas also identify relevant heritage consideration where appropriate.)</u></p>
MM36	MAIN83 FMM51	Policy EH7 – Historic Environment	<p><u>Policy EH7 – Historic Environment</u></p> <p>All development proposals should conserve or enhance the special character and distinctiveness of West Oxfordshire’s historic environment, and preserve or enhance the District’s heritage assets, and their significance and settings.</p> <p>Proposals affecting non-designated heritage assets, such as locally listed buildings, will be assessed on the basis of the significance of the heritage asset and the scale of harm or loss to that heritage asset. The Council’s Conservation Area Appraisals should be used as a guide when assessing the significance of a heritage asset.</p> <p>Proposals that will lead to harm to the significance of a designated or non-designated heritage asset or its setting will be resisted, unless a clear and convincing justification can be made to outweigh that harm.</p> <p>Proposals that will lead to substantial harm to or total loss of the significance of a heritage asset or its setting, will be refused, unless the harm is outweighed by substantial, demonstrable public benefits or all the four tests set out in the NPPF are met*.</p> <p>* Paragraph 133 of the NPPF:</p> <p>1. There is no viable use of the heritage asset that can be found in the medium term, including through marketing to find alternative owners</p> <p>2. The heritage asset is preventing all reasonable uses of the site</p> <p>3. Public support for or ownership of the asset is demonstrably not possible; and</p>

			<p>4. The harm or loss is outweighed by the benefits of bringing the site back into use</p> <p><u>Policy EH7 – Historic Environment</u></p> <p><u>All development proposals should conserve and/or enhance the special character, appearance and distinctiveness of West Oxfordshire’s historic environment, including the significance of the District’s heritage assets, in a manner appropriate to their historic character and significance and in a viable use that is consistent with their conservation, in accordance with national legislation, policy and guidance for the historic environment.</u></p> <p><u>In determining applications, great weight and importance will be given to conserving and/or enhancing the significance of designated heritage assets, including:</u></p> <ul style="list-style-type: none"> <u>- the outstanding universal values for which Blenheim Palace and Park is inscribed as a World Heritage Site (WHS), as guided by its WHS Management Plan (see also Policy EW1);</u> <u>- the special architectural and historic interest of Listed Buildings, with regard to their character, fabric and their settings;</u> <u>- the special architectural and historic interest, character and/or appearance of the District’s Conservation Areas and their settings, including the contribution their surroundings make to their physical, visual and historic significance;</u> <u>- the special archaeological and historic interest of nationally important monuments (whether Scheduled or not), both with regard to their fabric and their settings;</u> <u>- the special cultural, architectural and historic interest of Registered Parks and Gardens, including the contribution their surroundings make to their physical, visual and historical significance.</u> <p><u>Significant weight will also be given to the local and regional value of non-designated heritage assets, including non-listed vernacular buildings (such as traditional agricultural buildings, chapels and mills), together with archaeological monuments that make a significant contribution to the District’s historic environment.</u></p> <p><u>All applications which affect, or have the potential to affect, heritage assets will be expected to:</u></p>
--	--	--	--

			<p><u>i) use appropriate expertise to describe the significance of the assets, their setting and historic landscape context of the application site, at a level of detail proportionate to the historic significance of the asset or area, using recognised methodologies and, if necessary, original survey. This shall be sufficient to understand the potential impact of the proposal on the asset’s historic, architectural and archaeological features, significance and character;</u></p> <p><u>ii) demonstrate that the proposal would, in order of preference:</u></p> <p><u>a) avoid adverse impacts on the significance of the asset(s) (including those arising from changes to their settings) and, wherever possible, enhance or better reveal the significance of the asset(s);</u></p> <p><u>b) minimise any unavoidable and justified (by the public benefits that would accrue from the proposed development – see below) adverse impacts and mitigate those impacts in a manner proportionate to the significance of the asset(s) and the nature and level of the impact, investigate and record changes to or loss of physical fabric, features, objects or other remains and make the results publicly available.</u></p> <p><u>iii) demonstrate that any new development that would result in the unavoidable and justified loss of all or part of a heritage asset would proceed within a reasonable and agreed timetable that makes allowance for all necessary safeguarding and recording of fabric and other remains, including contingencies for unexpected discoveries.</u></p> <p><u><i>Designated assets</i></u></p> <p><u>Proposals which would harm the significance of a designated asset will not be approved, unless there is a clear and convincing justification in the form of substantive tangible public benefits that clearly and convincingly outweigh that the harm, using the balancing principles set out in national policy and guidance.</u></p> <p><u><i>Non-designated heritage assets</i></u></p> <p><u>When considering proposals that affect, directly or indirectly, the significance of non-</u></p>
--	--	--	---

			<p><u>designated heritage assets, a balanced judgement will be made having regard to:</u></p> <p><u>i. the scale of any harm or loss;</u> <u>ii. the significance of the heritage asset; and</u> <u>iii. the public benefits of the development.</u></p> <p><u>If it is determined through the relevant evidence that currently non-designated buildings, structures, historic landscapes or archaeology are of national significance, those elements of this policy for designated heritage assets will apply.</u></p> <p><i><u>Record and advance understanding</u></i></p> <p><u>Where development that would result in substantial harm to or loss of the significance of a heritage asset is permitted, developers will be required to record and advance understanding of the significance of that asset, in a manner appropriate to the nature of the asset, its importance and the impact, and publish that evidence and make it publicly accessible *.</u></p> <p><u>*(For the avoidance of doubt, the ability to mitigate loss of significance through investigation and recording will not contribute to the balancing judgement of whether such a loss is justifiable under this policy.)</u></p>
MM37	FMM52	Policy EH8 - Conservation Areas	<p><u>Policy EH8 - Conservation Areas</u></p> <p><u>Proposals for development in a Conservation Area or affecting the setting of a Conservation Area will be permitted where it can be shown to conserve or enhance the special interest, character, appearance and setting, specifically provided that:</u></p> <p><u>I. the location, form, scale, massing, density, height, layout, landscaping, use, alignment and external appearance of the development conserves or enhances the special historic or architectural interest, character and appearance of the Conservation Area;</u> <u>II. the development conserves or enhances the setting of the Conservation Area and is not detrimental to views within, into or out of the Area;</u> <u>III. the proposals are sympathetic to the original curtilage and pattern of development and to important green spaces, such as paddocks, greens and gardens, and other gaps</u></p>

			<p><u>or spaces between buildings and the historic street pattern which make a positive contribution to the character in the Conservation Area;</u></p> <p><u>IV. the wider social and environmental effects generated by the development are compatible with the existing character and appearance of the Conservation Area; and</u></p> <p><u>V. there would be no loss of, or harm to, any feature that makes a positive contribution to the special interest, character or appearance of the Conservation Area, unless the development would make an equal or greater contribution.</u></p> <p><u>Applications for the demolition of a building in a Conservation Area will only be permitted where it has been demonstrated that:</u></p> <p><u>a) the building detracts from or does not make a positive contribution to the special interest, character or appearance of the Conservation Area; or</u></p> <p><u>b) the building is of no historic or architectural interest or is wholly beyond repair and is not capable of beneficial use; and</u></p> <p><u>c) any proposed replacement building makes an equal or greater contribution to the special interest, character or appearance of the Conservation Area.</u></p> <p><u>Wherever possible the sympathetic restoration and re-use of buildings that make a positive contribution to the special interest, character and appearance of a Conservation Area will be encouraged, thereby preventing harm through the cumulative loss of features which are an asset to the Conservation Area.</u></p>
MM38	FMM53	Policy EH9 – Listed Buildings	<p><u>Policy EH9 – Listed Buildings</u></p> <p><u>Proposals for additions or alterations to, or change of use of, a Listed Building (including partial demolition) or for development within the curtilage of, or affecting the setting of, a Listed Building, will be permitted where it can be shown to:</u></p> <p><u>i. conserve or enhance the special architectural or historic interest of the building’s fabric, detailed features, appearance or character and setting;</u></p> <p><u>ii. respect the building’s historic curtilage or context or its value within a group and/or</u></p>

			<p><u>its setting, including its historic landscape or townscape context; and</u></p> <p><u>iii retain the special interest that justifies its designation through appropriate design that is sympathetic both to the Listed Building and its setting and that of any adjacent heritage assets in terms of siting, size, scale, height, alignment, materials and finishes (including colour and texture), design and form.</u></p>
MM39	FMM54	Policy EH10 – Traditional Buildings	<p><u>Policy EH10 – Traditional Buildings</u></p> <p><u>In determining applications that involve the conversion, extension or alteration of traditional buildings, proposals will not normally be permitted where this would:</u></p> <p><u>I. extensively alter the existing structure or remove features of interest;</u> <u>II. include extensions or alterations which would obscure or compromise the form or character of the original building.</u></p>
MM40	FMM55	Policy EH11 – Historic Landscape Character	<p><u>Policy EH11 – Historic Landscape Character</u></p> <p><u>In determining applications that affect the historic character of the landscape or townscape, particular attention will be paid to the following:</u></p> <p><u>i) the age, distinctiveness, rarity, sensitivity and capacity of the particular historic landscape or townscape characteristics affected</u> <u>ii) the extent to which key historic features resonant of the area’s character, such as hedgerows, watercourses and woodland, will be retained or replicated</u> <u>iii) the degree to which the form and layout of the development will respect and build on the pre-existing historic character (including e.g. street and building layouts)</u> <u>iv) the degree to which the form, scale, massing, density, height, layout, landscaping, use, alignment and external appearance of the development conserves or enhances the special historic character of its surroundings.</u></p>

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM41	FMM56	Policy EH12 - Registered Historic Parks and Gardens	<p><u>Policy EH12 - Registered Historic Parks and Gardens</u></p> <p><u>Proposals for development that would affect, directly or indirectly, the significance of a Historic Park or Garden on Historic England’s Register of Historic Parks and Gardens will be permitted where the proposals:</u></p> <p><u>I. conserve or enhance those features which form an integral part of the special character, design or appearance of the Historic Park or Garden; and</u></p> <p><u>II. ensure that development does not detract from the special historic interest, enjoyment, layout, design, character, appearance or setting of the Historic Park or Garden, key views within, into and out from the Historic Park or Garden, or does not result in the loss of, or damage to, their form or features nor prejudice its future restoration.</u></p> <p><u>Proposals that would enable the restoration of original layout and features where this is appropriate, based upon thorough research and understanding of the historical form and development, will be supported.</u></p>
MM42	FMM57	Policy EH13 - Scheduled Monuments and Other Nationally Important Archaeological Remains	<p><u>Policy EH13 - Scheduled Monuments and Other Nationally Important Archaeological Remains</u></p> <p><u>Proposals for development that would affect, directly or indirectly, the significance of Scheduled Monuments or non-scheduled archaeological remains of demonstrably equal significance will be permitted where the proposals would conserve or enhance the significance of the Monument or remains, including the contribution to that significance of the setting of the Monument or remains.</u></p> <p><u>Nationally important archaeological remains (whether scheduled or demonstrably of equivalent significance) should be preserved in situ.</u></p>

			<p><u>Any unavoidable harm to or loss of Scheduled Monuments or nationally important archaeological remains (justified in accordance with the principles set out in national planning policy and Policy EH7), should be:</u></p> <p><u>I _____ minimised through: careful design, including modifying building footprints; the use of appropriate construction methods and temporary works; avoiding damaging landscaping proposals; seeking engineering design solutions; and</u></p> <p><u>II _____ mitigated by a programme of archaeological investigation, recording and analysis.</u></p>
MM43	FMM58	Policy EH14 - Non-designated heritage assets	<p><u>Policy EH14 – Non-designated heritage assets</u></p> <p><u>When considering proposals that would affect, directly or indirectly, non-listed buildings, non-scheduled, non-nationally important archaeological remains or non-Registered Historic Parks and Gardens, as such assets are also irreplaceable, the presumption will be in favour of the avoidance of harm or loss. A balanced judgement will be made having regard to this presumption, the significance of the heritage asset, the scale of any harm or loss, and the benefits of the development. Proposals will be assessed using the principles set out for listed buildings, scheduled monuments and Registered Historic Parks and Gardens in Policies EH9, EH13 and EH12.</u></p>

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM44	MAIN96 FMM59	Policy WIT1 – East Witney Strategic Development Area	<p><u>Policy WIT1 – East Witney Strategic Development Area (400 450 homes)</u></p> <p>Land to the east of Witney to accommodate a sustainable, integrated community that forms a positive addition to Witney, including:</p> <p>a) about 400-450 homes with a balanced and appropriate mix of residential accommodation to meet identified needs, including affordable housing. This will include c.30 homes on land adjacent to Stanton Harcourt Road (subject to landscape impact and flood risk) and c.370 <u>420</u> homes on land at Cogges Triangle (subject to landscape impact and surface water run-off).</p> <p><u>ai) comprehensive development to be led by an agreed masterplan.</u></p> <p>b) development to be phased in accordance with the timing of provision of supporting infrastructure and facilities with the including the essential necessary improvements to the Shore’s Green junction onto the A40 and related highway measures. to be delivered prior to the completion of any housing on the Cogges Triangle part of the site.</p> <p>c) the provision of other supporting transport infrastructure, including mitigating proposals to mitigate the impact of traffic associated with the development <u>development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of ,and incorporating</u> a comprehensive network for pedestrians <u>and ,cyclists and public transport with links-good connectivity provided</u> to adjoining areas, including a particular emphasis on improving the linkages across the Windrush Valley into the town centre consistent with the aims and objectives of the Windrush in Witney Project <u>and to Hanborough Station.</u></p> <p>d) the provision of appropriate landscaping measures to mitigate the potential impact of development and associated infrastructure.</p> <p>e) the provision of appropriate financial contributions towards primary and secondary education capacity enhancements.</p>

			<p>f) biodiversity, <u>landscape and public access</u> enhancements <u>within the Lower Windrush Valley</u> including arrangements for future maintenance.</p> <p>g) provision of appropriate green infrastructure including allotments.</p> <p>h) appropriate measures to mitigate traffic noise.</p> <p><u>hi) the conservation, and enhancement where possible, of the setting of the Cogges Scheduled Monument and the Witney and Cogges Conservation Area.</u></p> <p><u>hii) the investigation, recording and safeguarding of the known and potential archaeological significance of the Area prior to any development taking place. The results of the investigation and recording should inform the final layout of the development and be deposited in a public archive.</u></p> <p>i) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</p> <p>j) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</p> <p>k) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</p> <p>l) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM45	MAIN103 FMM60	Policy WIT2 – North Witney Strategic Development Area	<p>Policy WIT2 – North Witney Strategic Development Area (1,000 1,400 homes)</p> <p>Land to the north of Witney to accommodate a sustainable, integrated community that forms a positive addition to Witney, including:</p> <p>a) about 1,000 1,400 homes with a balanced and appropriate mix of residential accommodation to meet identified needs, including affordable housing; This will include c.200 homes on land between New Yatt Road and Woodstock Road and c.800 homes on land between Hailey Road and New Yatt Road</p> <p>ai) comprehensive development to be led by an agreed masterplan;</p> <p>b) development on the larger part of the site between New Yatt Road and Woodstock Road to be phased to come forward in the period post 2021 in accordance with the timing of <u>provision of</u> supporting infrastructure and facilities including <u>the essential</u> delivery of the West End Link and Northern Distributor Road;</p> <p>c) the provision of other supporting transport infrastructure, including mitigating proposals to mitigate the impact of traffic associated with the development; <u>the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site;</u> and <u>provision of and incorporating a comprehensive network for pedestrians and cyclists and public transport with links good connectivity provided</u> to adjoining areas including the town centre and other key destinations;</p> <p>d) the provision of a new primary school on-site (1.5FE (including foundation stage) with 2FE core facilities to enable future expansion of the school together with financial contributions towards secondary school capacity as appropriate;</p> <p><u>d) the provision of a new primary school on-site (2FE including nursery) on a 2.2ha site</u></p>

			<p><u>together with financial contributions towards secondary school capacity as appropriate.</u></p> <p><u>di) the conservation and where possible enhancement of the setting of the grade II listed Middlefield Farmhouse and dovecote and the Witney and Cogges and Hailey Conservation Areas;</u></p> <p><u>dii) the investigation, recording and safeguarding of the known and potential archaeological significance of the Area prior to any development taking place. The results of the investigation and recording should inform the final layout of the development and should be deposited in a public archive;</u></p> <p>e) the provision of appropriate landscaping measures to mitigate the potential impact of development including a positive landscape framework to create a new town edge;</p> <p>f) retention of important on-site hedgerows and plantation woodland;</p> <p>g) biodiversity enhancements including arrangements for future maintenance;</p> <p>h) provision of appropriate green infrastructure including allotments;</p> <p>i) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. <u>This may include consideration of 'off-site' solutions.</u> The sustainable drainage systems should be designed to provide a biodiversity enhancement.</p> <p>j) all development should be steered to areas at least flood risk within Flood Zone 1 and flood alleviation measures to reduce flood risk associated with the Hailey Road Drain should be incorporated where appropriate.</p> <p>k) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</p> <p>l) ensuring that the <u>design and</u> construction of the West End Link has no <u>harmful-undue</u> impact on <u>heritage assets and</u> biodiversity and provides for <u>mitigation and</u> enhancements to biodiversity where feasible;</p> <p>m) demonstrate the use of renewable energy, sustainable design and construction methods,</p>
--	--	--	---

			<p>with a high level of energy efficiency in new buildings.</p> <p>n) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</p>
MM46	MAIN108 FMM61	Policy WIT2a – Woodford Way Car Park, Witney	<p><u>Policy WIT2a – Woodford Way Car Park, Witney</u></p> <p><u>Land at Woodford Way Car Park to accommodate around 50 new homes either as part of a residential or mixed-use scheme with other compatible town centre uses whilst retaining an appropriate amount of public car parking.</u></p> <p><u>Key issues to be addressed as part of any development proposal will include:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing;</u></p> <p><u>b) making efficient use of the site in terms of density and layout recognising the irregular site boundary and the need to provide passive supervision of the footpath along the southern boundary;</u></p> <p><u>c) the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas including the town centre and other key destinations.</u></p> <p><u>d) consideration of appropriate flood risk avoidance/mitigation;</u></p> <p><u>e) appropriate provision of and contributions towards supporting infrastructure;</u></p> <p><u>f) the need to provide a strong frontage to Woodford Way whilst ensuring that the height and design of any proposed buildings has regard to the topography of the site and the potential impact on adjoining occupants including in particular the single storey bungalows to the west of the site;</u></p> <p><u>g) connection to the mains sewerage network which includes infrastructure upgrades where</u></p>

			<p><u>required including any necessary phasing arrangements;</u></p> <p><u>h) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p>
MM47	MAIN111 FMM62	Policy WIT2b – Land West of Minster Lovell	<p><u>Policy WIT2b – Land West of Minster Lovell</u></p> <p><u>Land to the west of Minster Lovell to accommodate around 125 new homes as part of a sustainable, integrated extension of the existing village.</u></p> <p><u>Key issues to be addressed as part of any development proposal will include:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing;</u></p> <p><u>b) the provision of primary vehicular access from the B4047;</u></p> <p><u>c) giving great weight to conserving the setting of the Cotswolds AONB to the north of the site including key views southwards towards the site;</u></p> <p><u>d) effective integration with the existing village including consideration of any pedestrian and cycle linkages;</u></p> <p><u>e) a positive enhancement of the western edge of Minster Lovell including the approach from the west along the B4047;</u></p> <p><u>f) development layout that respects the existing built form to the east of the site;</u></p> <p><u>g) appropriate provision of and contributions towards supporting infrastructure including the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas including the town centre and other key destinations;</u></p> <p><u>h) provision of open space on the south of the site to take account of the existing public open space on Ripley Avenue;</u></p>

			<p><u>i) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements;</u></p> <p><u>j) the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement;</u></p> <p><u>k) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p>
MM48	MAIN114 FMM64	Policy WIT3 – Witney Town Centre Strategy	<p><u>Policy WIT3 – Witney Town Centre Strategy</u></p> <p>The overall objective is to maintain and enhance Witney Town Centre providing an accessible, attractive and diverse shopping, visitor and evening economy offer and the principal shopping and leisure destination for West Oxfordshire and the surrounding area. This will be achieved by:</p> <ul style="list-style-type: none"> - Maintaining a strong and diverse shopping core with a good mix of retailers, focused on the High Street as the main pedestrian route and connector between the Woolgate and Marriotts Walk shopping centres. A primary shopping frontage is defined between these shopping centres and along the High Street where <u>development resulting in the loss of shops will be resisted unless the criteria listed in Policy E6 (Town Centres) can be met in full.</u> - Promoting the Market Square and Corn Street areas as shopping, leisure and cultural quarters, whilst avoiding excessive resisting concentrations of <u>single uses where this would be likely to cause issues of amenity or affect the vitality of the area. that could impact on amenity or vitality.</u> Secondary shopping frontages are defined in these and other areas <u>where development proposals resulting in the loss of town centre uses will be refused unless the criteria listed in Policy E6 – Town Centres, can be met in full. The loss of town centre uses from secondary shopping frontages will be resisted.</u> - Investigating opportunities for phased, organic extension of the Woolgate shopping centre and at Welch Way to meet retailer needs, well connected to and strengthening the High Street. - Maintaining and enhancing the Market Square as an attractive public space which can be

			<p>used for other purposes at other times.</p> <ul style="list-style-type: none"> - Seeking to raise the profile of Witney as a visitor destination, investigating opportunities for additional accommodation and improved visitor facilities such as coach drop off/waiting areas. - <u>Conserving and enhancing the special interest of the Witney Conservation Area and the significance of the other heritage assets in the town.</u> - Enhancing the historic market town character and public realm by seeking to ensure investment in paved areas, street furniture, signage and shop fronts and through the provision of appropriate servicing and waste collection arrangements. - Ensuring the town centre, as a key destination, remains accessible, through the provision and management of car parking and through enhancing public transport, pedestrian and cycle routes and infrastructure. - In the Buttercross/Church Green area south of Corn Street and Langdale Gate, the further intensification of shopping or commercial development will be resisted except where the proposed use would be incidental to the primary permitted use of the building (e.g. working at home). <p>Development proposals which significantly increase car parking demand will be expected to make appropriate public car parking provision or provide equivalent financial contributions.</p>
MM49	MAIN115 FMM65	Policy WIT4 – Witney Sub-Area Strategy	<p><u>Policy WIT4 – Witney Sub-Area Strategy</u></p> <p>The focus of new housing, supporting facilities and additional employment opportunities will be Witney. New development in the rest of the sub-area will be limited to meeting local community and business needs and will be steered towards the larger villages.</p> <p>Proposals for development in the sub-area should be consistent with the strategy which includes:</p> <ul style="list-style-type: none"> - delivery of around 3,700 4,702 new homes* to be focused on Witney and to include affordable housing and homes designed to meet a range of different needs including older

			<p>people.</p> <ul style="list-style-type: none"> - a Strategic Development Area of around 400 <u>450</u> dwellings on the eastern side of Witney (see Policy WIT1) - a Strategic Development Area of around 1,000 <u>1,400</u> dwellings to the north of Witney (see Policy WIT2) <u>- a non-strategic housing allocation of 50 dwellings on Woodford Way Car Park, Witney (see Policy WIT2a)</u> <u>- a non-strategic housing allocation of 125 dwellings on land west of Minster Lovell (see Policy WIT2b)</u> - expansion of employment opportunities in the town through the retention and modernisation of existing sites, development of remaining available employment land (10ha <u>8ha</u>) and the provision of further employment land (at least 10ha) on the western edge of Witney to provide sufficient space for business expansion, relocation and inward investment - continuing to work with Oxfordshire County Council and landowners/developers to deliver improvements to key highway infrastructure to reduce traffic and pollution in the historic core and to improve the general flow of traffic and access to primary transport routes, with priority on delivering the A40/Downs Road junction (all traffic movements), Shore's Green junction (west facing slip roads) the West End Link and Northern Distributor Road and other supporting highway improvement measures - enhancing public transport, and pedestrian and cycle routes and infrastructure together with managing car parking to reduce car use for short journeys - avoiding development which will be at risk of or increase the risk of flooding and working with landowners/developers and partners such as the Environment Agency to deliver flood mitigation measures - protection and enhancement of the market town character and setting of Witney, neighbouring villages and the Windrush Valley, including the particularly vulnerable gap between Witney and Ducklington - development on land within or where it would be visible from the Windrush in Witney
--	--	--	--

			<p>Policy Area will be required to protect and enhance the intrinsic landscape, character, ecology and cultural value of the valley</p> <ul style="list-style-type: none"> - protection <u>conservation and enhancement</u> of the Cotswolds Area of Outstanding Natural Beauty (AONB) - <u>Conservation and enhancement of the historic environment</u> - ensuring that new development makes appropriate and timely provision for <u>essential necessary</u>-supporting infrastructure, including new <u>transport</u>, education, health, green infrastructure and other community facilities in accordance with the IDP. - <u>maximising opportunities for enhancements within the Conservation Target Areas (CTAs).</u> - <u>masterplanning of strategic development areas that takes adequate account of open space and green infrastructure networks and needs, and maximises opportunities to create and strengthen green infrastructure in accordance with the Council's Green Infrastructure Plan (to be prepared).</u> <p><u>* Note: In accordance with Policy H1, the figure of 4,702 homes is not an absolute target or a maximum ceiling to development.</u></p>
--	--	--	--

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM50	MAIN125 FMM66	Policy CA1 – REEMA Central	<p>Policy CA1 – REEMA <u>North and Central Strategic Development Area (SDA)</u></p> <p>Land at REEMA <u>North and Central</u> to accommodate a sustainable, integrated community that forms a positive addition to Carterton. Proposals for development should be consistent with the following:</p> <p>a) a net increase of about 200-300 homes with a range of residential accommodation to meet identified needs including affordable housing.</p> <p>b) provision of high quality pedestrian and cycle links to the Town Centre and other key destinations.</p> <p>c) contribution towards education and indoor and outdoor leisure provision in the local area.</p> <p>d) appropriate provision for green infrastructure.</p> <p>e) necessary supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development. <u>the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas including the town centre and other key destinations.</u></p> <p>f) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</p> <p>g) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</p> <p>h) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</p>

MM51	MAIN128 FMM67	Policy CA1a Land at Milestone Road, Carterton	<p><u>Policy CA1a Land at Milestone Road, Carterton</u></p> <p><u>Land to the south of Milestone Road, Carterton to accommodate around 200 dwellings as a well-integrated and logical extension of the existing built form of the town.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing;</u></p> <p><u>b) provision of satisfactory vehicular accesses from Milestone Road via a through road and appropriate pedestrian and cycle connections;</u></p> <p><u>c) appropriate provision of and contributions towards essential supporting infrastructure, including the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas and other key destinations;</u></p> <p><u>d) development to take account of the height, scale and density of surrounding buildings;</u></p> <p><u>e) where necessary, provision of noise mitigation measures to take account of potential noise from RAF Brize Norton</u></p> <p><u>f) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>g) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p> <p><u>h) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</u></p>
------	------------------	---	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM52	MAIN131 FMM68	Policy CA1b Land at Swinbrook Road, Carterton	<p><u>Policy CA1b Land at Swinbrook Road, Carterton</u></p> <p><u>Land to the east of Swinbrook Road, Carterton to accommodate around 70 dwellings as a well-integrated and logical extension of the existing built form of the town.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing</u></p> <p><u>b) the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas and other key destinations;</u></p> <p><u>c) density, layout and form of development that integrates effectively with the adjoining residential scheme to the south of the site;</u></p> <p><u>d) appropriate provision of and contributions towards essential supporting infrastructure including extension/enhancement of Kilkenny Country Park and/or provision or improvement of other sports/recreation facilities;</u></p> <p><u>e) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>f) the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</u></p> <p><u>g) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p>

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM53	FMM71	Policy CA2 – Carterton Town Centre Strategy	<p><u>Policy CA2 – Carterton Town Centre Strategy</u></p> <p>Carterton Town Centre will become the local retail centre of choice for those living and working in the town and surrounding villages:</p> <ul style="list-style-type: none"> • Provide a wider range of well integrated shops, eating and drinking establishments, leisure opportunities, public spaces and ancillary town centre facilities including ancillary residential development. • Create distinctive and attractive shopping frontages through high quality traditional and contemporary design and landscaping, utilising high quality materials with some local references, and retaining and enhancing existing trees and planted areas where appropriate. • Retain and provide adequate car parking and provide for improved access, particularly for pedestrians, cyclists and public transport users, whilst not precluding the potential for pedestrianisation. • A primary shopping frontage is defined to the south side of Alvescot Road and Brize Norton Road to provide a focal point for shopping within the <u>town</u> centre. <u>Development proposals resulting in the loss of shops within this defined frontage will be resisted-refused unless the criteria listed in Policy E6 (Town Centres) can be met in full.</u> • Secondary shopping frontages are defined along the northern side of Alvescot Road, Burford Road and the western side of Black Bourton Road. <u>Development resulting in the loss of town centre uses from these shopping frontages will be resisted-refused unless the criteria listed in Policy E6 (Town Centres) can be met in full. and excessive concentrations of uses that could affect amenity or vitality will be avoided. The concentrations of single uses will not be allowed where this would be likely to cause issues of amenity or affect the vitality of the area.</u>

			<ul style="list-style-type: none"> • Potential redevelopment of a number of opportunity sites including land on the western side of Burford Road, the southern side of Alvescot Road and the western side of Black Bourton Road. To provide more active and vibrant frontages and efficient use of available space potentially through mixed-use development of complementary uses. • The main streets will be promoted as a distinctive tree-lined 'green avenue' with gateway features used to demarcate arrival into the Town Centre. • Improvements to the main crossroads to facilitate vehicular, pedestrian and cycle movement and improve the quality of the surrounding environs. • Improvements to the quality of the public realm including the provision of public art and street furniture. <p>Developer contributions and funding from other potential sources will be sought towards these and other Town Centre improvements as appropriate.</p>
MM54	MAIN134 FMM72	Policy CA3 – Carterton Sub-Area Strategy	<p><u>Policy CA3 – Carterton Sub-Area Strategy</u></p> <p>The focus of new housing, supporting facilities and additional employment opportunities will be Carterton. New development in the rest of the sub-area will be limited to meeting local community and business needs and will be steered towards the rural service centre and larger villages.</p> <p>Proposals for development in the sub-area should be consistent with the strategy which includes:</p> <ul style="list-style-type: none"> - delivery of around 2,6002,680 new homes* to be focused on Carterton and to include affordable housing and homes designed to meet a range of different needs including older people. - redevelopment of existing sub-standard MOD housing including a Strategic Development Area of about 200 dwellings (net) at REEMA Central (see Policy CA1) - redevelopment of existing sub-standard MOD housing including a non-strategic housing

			<p><u>allocation of around 300 dwellings (net) at REEMA North and Central (see Policy CA1)</u></p> <p><u>- a non-strategic housing allocation of around 200 dwellings at Milestone Road, Carterton (see Policy CA1a)</u></p> <p><u>- a non-strategic housing allocation of around 70 dwellings at Swinbrook Road, Carterton (see Policy CA1b)</u></p> <p>- satisfactorily accommodating the needs of RAF Brize Norton and of local communities and visitors and working with RAF Brize Norton to meet their needs and ensure their impacts are mitigated wherever possible</p> <p>- <u>provision of around 6 ha of business land including</u> retention of remaining land for businesses (5ha<u>4.5ha</u>) at West Oxfordshire Business Park and Ventura Park <u>in addition to the provision of an additional 1.5ha of employment land as part of the committed mixed-use urban extension east of Monahan Way</u>. Working in partnership with the Town Council and landowners to identify further opportunities for business land provision within and adjoining Carterton. with the aim of delivering at least 10 hectares of high quality business land over the period of the Local Plan.</p> <p>- a stronger and more attractive and well-connected town centre in accordance with the Carterton Town Centre development strategy (Policy CA2)</p> <p>- working with the highway authority, the Town Council and other partners to improve connections between Carterton and the primary road network and deliver <u>essential necessary</u> strategic transport improvements including the upgrading of the B4477 Minster Lovell Road to A-road standard and supporting complementary measures plus the provision-promotion of west facing slip roads at the junction of the B4477 and A40. Developer contributions and other potential sources of funding will be sought as appropriate.</p> <p>- Enhancing the frequency and coverage of bus services to key destinations as well as the quality of waiting facilities and improving conditions throughout the town for pedestrians and cyclists.</p> <p>- maintaining, enhancing and extending the green buffer on the northern edge of Carterton including between Carterton and Brize Norton village</p>
--	--	--	--

			<ul style="list-style-type: none"> - protection and enhancement of the biodiversity and leisure value of the Shill Brook Valley - <u>maximising opportunities for enhancements within the Conservation Target Areas (CTAs)</u> - protection and enhancement of the character and setting of Carterton and the identity of neighbouring villages - <u>Conservation and enhancement of the historic environment and heritage assets</u> - avoiding development which will be at risk of or increase the risk of flooding and working with landowners/developers and partners such as the Environment Agency to deliver flood mitigation measures - ensuring that new development makes appropriate and timely provision for <u>essential necessary</u>-supporting infrastructure, including <u>new transport, education, health, green infrastructure, and other community facilities such as new cemetery space in accordance with the Council's Infrastructure Delivery Plan</u> provision of new green infrastructure, community and leisure facilities - working with the River Thames Alliance, support tourism and leisure proposals which are sensitive to and where appropriate enhance the ecological, landscape and heritage value of the River Thames. <p><u>* Note: In accordance with Policy H1, the figure of 2,680 homes is not an absolute target or a maximum ceiling to development.</u></p>
--	--	--	--

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM55	MAIN140 FMM74	Policy CN1 – East Chipping Norton Strategic Development Area	<p><u>Policy CN1 – East Chipping Norton Strategic Development Area (600-1,200 homes)</u></p> <p>Land to the east of Chipping Norton to accommodate a sustainable, integrated community that forms a positive addition to the town, including:</p> <p>a) about 600-1,200 homes with a balanced and appropriate mix of residential accommodation to meet identified needs, including affordable housing;</p> <p>a) comprehensive development for the whole site including land north and south of London Road to be led by an agreed masterplan;</p> <p>b) provision for additional business floorspace of around 1.5 ha as part of the overall quantum and mix of development;</p> <p>b) provision for additional business floorspace of around 5 ha on land to the north of London Road;</p> <p>c) the provision of appropriate landscaping measures to mitigate the potential impact of development;</p> <p>d) the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas and other key destinations. In particular, satisfactory vehicular access arrangements should to be agreed in principle with the highway authority and demonstrated through a robust Transport Assessment (TA) to include the provision of an eastern link road connecting the Banbury Road to the B4026/A361 via London Road. This will be provided as an integral part of the proposed SDA;</p> <p>e) the provision of a new primary school on site (1.5FE (including foundation stage) with 2FE core facilities to enable future expansion of the school);</p>

			<p><u>e) the provision of a new primary school on-site (2FE (including nursery) on a 2.22ha site;</u></p> <p>g) provision of local convenience shopping, community and leisure facilities through the creation of a local centre, with due consideration given to any potential impact on the vitality and viability of the town centre;</p> <p>h) green space and biodiversity enhancements including arrangements for future maintenance <u>recognising that part of the sites falls within the Glyme and Dorn Conservation Target Area (CTA);</u></p> <p><u>hi) the investigation, recording and safeguarding of the known and potential archaeological significance of the Area prior to the commencement of development. The results of the investigation and recording should inform the development and be deposited in a public archive;</u></p> <p>i) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</p> <p>j) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</p> <p>k) mitigation measures to ensure there is no detrimental impact on groundwater quality</p> <p>l) supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development <u>including on the air quality management area (AQMA)</u> and incorporating a comprehensive network for pedestrians, cyclists and public transport with links to adjoining areas;</p> <p>m) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings; and</p> <p>n) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</p> <p><u>o) Lighting proposals relating to the site will need to have due regard to the potential impact</u></p>
--	--	--	---

			<p><u>on the AONB, in particular the Rollright Stones Dark Skies Discovery Site.</u></p> <p><u>p) The issue of health care provision and capacity of the Chipping Norton Health Centre to absorb additional patient numbers to be taken into account as part of any masterplan for the site.</u></p> <p><u>g) Where necessary, replacement/re-provision of any allotments that are lost as a result of the proposed development, in an appropriate, accessible location.</u></p>
MM56	MAIN143 FMM75	Policy CN2 – Chipping Norton Sub-Area Strategy	<p><u>Policy CN2 – Chipping Norton Sub-Area Strategy</u></p> <p>The focus of new housing, supporting facilities and additional employment opportunities will be Chipping Norton. New development in the rest of the sub-area will be limited to meeting local community and business needs and will be steered towards the larger villages.</p> <p>Proposals for development in the sub-area should be consistent with the strategy which includes:</p> <ul style="list-style-type: none"> - Delivery of around 1,800 <u>2,047</u> new homes* to be focused on Chipping Norton to include affordable housing and homes designed to meet a range of different needs including older people. - A strategic mixed-use development area of around 600 <u>1,200</u> dwellings on the eastern side of Chipping Norton (see Policy CN1) - Retention and where appropriate modernisation of existing business premises together with the provision of additional business land of at least 4.5 hectares and up to 7.3 hectares located on the eastern side of the town. - Retention and where appropriate modernisation of existing business premises together with the provision of additional business land of 5 hectares to be provided as part of the East Chipping Norton SDA on land to the north of London Road. - conservation and enhancement of the town’s landscape setting and heritage assets. - protection <u>conservation and enhancement</u> of the Cotswolds Area of Outstanding Natural Beauty (AONB).

			<ul style="list-style-type: none"> - working with the highway authority, the town council and other partners to reduce the impact of through traffic, especially lorries, upon the town centre and its air quality. <u>This will include the provision of a new eastern link road to be delivered as an integral part of the East Chipping Norton Strategic Development Area (SDA).</u> - improving the range, frequency and speed of bus services to key destinations. - improving conditions throughout the town and surrounding areas for pedestrians and cyclists, including accessibility to bus and rail services. - a stronger town centre with new opportunities for retail and community facilities on land between High Street and Albion Street A primary shopping frontage is defined at the High Street and Market Place. - management of public car parking areas and the provision of adequate public car parking capacity to help support the town centre. - ensuring that new development makes appropriate and timely provision for <u>essential necessary</u>-supporting infrastructure <u>including new transport, education, health , green infrastructure and other community facilities in accordance with the IDP.</u> - <u>maximising opportunities for enhancements within the Conservation Target Areas (CTAs).</u> - <u>masterplanning of strategic development areas that takes adequate account of open space and green infrastructure networks and needs, and maximises opportunities to create and strengthen green infrastructure in accordance with the Council's Green Infrastructure Plan (to be prepared).</u> - provision of new education and community facilities. - <u>R</u>edevelopment of suitable previously developed sites within the town provided they are not of high environmental value and the loss any existing use would not conflict with other relevant plan policies. <p><u>* Note: In accordance with Policy H1, the figure of 2,047 homes is not an absolute target or a maximum ceiling to development.</u></p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM57	MAIN155 FMM78	Policy EW1a – West Oxfordshire Garden Village Strategic Development Area	<p><u>Policy EW1a – Oxfordshire Cotswolds Garden Village Strategic Location for Growth (2,200 homes)</u></p> <p><u>Land to the north of the A40, near Eynsham to accommodate a free-standing exemplar Garden Village, the comprehensive development of which will be led by an Area Action Plan (AAP) including:</u></p> <p><u>a) a working assumption of about 2,200 homes with a balanced and appropriate mix of house types and tenures to meet identified needs including affordable housing.</u></p> <p><u>b) development taken forward in accordance with key Garden Village principles.</u></p> <p><u>c) about 40 hectares of business land (B-class) in the form of a ‘campus-style’ science park.</u></p> <p><u>d) provision of a new park and ride site (1,000 spaces) with associated bus priority lane along the A40.</u></p> <p><u>e) the provision of up to two primary schools on site (2FE including nursery) on 2.22ha sites together with financial contributions towards secondary school capacity as appropriate.</u></p> <p><u>f) The provision of essential supporting transport infrastructure the detail of which will be identified through the AAP process, including mitigating the impact of traffic associated with the development; appropriate consideration of the proposed park and ride, wider A40 improvements and access arrangements for the West Eynsham Strategic Development Area (SDA); the provision of appropriate financial contributions towards LTP4 transport schemes such as the A40 Strategy; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas, including a particular emphasis on improving linkages to Hanborough Station, to the proposed Park and Ride and to Eynsham and on enhancing Hanborough Station as a transport interchange.</u></p> <p><u>g) development to be phased in accordance with the timing of provision of essential</u></p>

			<p><u>supporting infrastructure and facilities.</u></p> <p><u>h) the provision of appropriate landscaping measures to mitigate the potential impact of development and associated infrastructure.</u></p> <p><u>i) biodiversity enhancements including arrangements for future maintenance.</u></p> <p><u>j) masterplanning that takes adequate account of open space and green infrastructure networks and needs, and maximises opportunities to create and strengthen green infrastructure in accordance with the Council's Green Infrastructure Plan (to be prepared).</u></p> <p><u>k) appropriate measures to mitigate traffic noise.</u></p> <p><u>l) the investigation, recording and safeguarding of the known and potential archaeological significance of the Area prior to any development taking place. The results of the investigation and recording should inform the final layout of the development and be deposited in a public archive.</u></p> <p><u>m) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</u></p> <p><u>n) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>o) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p> <p><u>p) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</u></p> <p><u>q) appropriate measures to safeguard and take account of the operational requirements of the existing aggregate recycling facility within the site and also to safeguard sand and gravel deposits where appropriate having regard to the policies of the Minerals and Waste Local Plan.</u></p>
--	--	--	--

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM58	MAIN158 FMM80	Policy EW1b – West Eynsham Strategic Development Area	<p><u>Policy EW1b – West Eynsham Strategic Development Area (1,000 homes)</u></p> <p><u>Land to the west of Eynsham to accommodate a sustainable integrated community that forms a positive addition to Eynsham, including:</u></p> <p><u>a) about 1,000 homes with a balanced and appropriate mix of house types and tenures to meet identified needs including affordable housing.</u></p> <p><u>b) comprehensive development to be led by an agreed masterplan.</u></p> <p><u>c) provision of a new western spine road funded by and provided as an integral part of the development and taking the opportunity to link effectively with the existing road network on the western edge of the village.</u></p> <p><u>d) the provision of a new primary school on-site (1.5FE including nursery) on a 2.22 ha site to enable future expansion together with financial contributions towards secondary school capacity as appropriate.</u></p> <p><u>e) the provision of other supporting transport infrastructure, including mitigating the impact of traffic associated with the development; appropriate consideration of the proposed park and ride, wider A40 improvements and the Oxfordshire Cotswolds Garden Village SLG; the provision of appropriate financial contributions towards LTP4 transport schemes such as the A40 Strategy; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas, including the Proposed Park and Ride, Eynsham Village, the Oxfordshire Cotswolds Garden Village, Hanborough Station and into the surrounding countryside.</u></p> <p><u>f) development to be phased in accordance with the timing of provision of essential supporting infrastructure and facilities.</u></p> <p><u>g) the provision of appropriate landscaping measures to mitigate the potential impact of</u></p>

			<p><u>development and associated infrastructure.</u></p> <p><u>h) biodiversity enhancements including arrangements for future maintenance.</u></p> <p><u>i) masterplanning that takes adequate account of open space and green infrastructure networks and needs, and maximises opportunities to create and strengthen green infrastructure in accordance with the Council's Green Infrastructure Plan (to be prepared).</u></p> <p><u>j) the investigation, recording and safeguarding of the known and potential archaeological significance of the Area prior to any development taking place. The results of the investigation and recording should inform the final layout of the development and be deposited in a public archive. Particular consideration will need to be given to the scheduled monument adjacent to the B4449 including when determining the most appropriate alignment/access arrangements for the western spine road. All feasible route options and junction arrangements must be explored to ensure that any harm to or loss of significance of the scheduled monument by crossing of or encroachment upon the monument or its setting should be avoided if at all possible, and that any unavoidable harm or loss of significance is minimised, as far as possible mitigated and justified in accordance with Policy EH13.</u></p> <p><u>k) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</u></p> <p><u>l) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>m) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p> <p><u>n) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</u></p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM59	MAIN163 FMM82	Policy EW1c – Land East of Woodstock	<p><u>Policy EW1c – Land East of Woodstock (300 homes)</u></p> <p><u>Land to the east of Woodstock, north of the A44 Oxford Road to accommodate around 300 dwellings as a well-integrated and logical extension of the existing built form of the town.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing.</u></p> <p><u>b) ensuring that development is consistent with Policy EW1 in respect of the protection, promotion and conservation of the Blenheim Palace World Heritage Site (WHS) and its setting.</u></p> <p><u>c) landscape dominated design with the provision of appropriate measures to mitigate the potential landscape, visual and heritage impact of the development including the retention and strengthening of existing hedgerows, use of appropriate building heights and materials and the provision of structural planting and semi-natural green space to protect the rural setting of the WHS and to achieve a positive enhancement of the approach to Woodstock from the south east.</u></p> <p><u>d) provision of satisfactory vehicular access and supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists, with good connectivity provided to key destinations including integrating with Woodstock, Hanborough Station and Oxford Parkway Station.</u></p> <p><u>e) appropriate provision of and contributions towards supporting infrastructure;</u></p> <p><u>f) the developer will be required to provide an assessment of any impacts on Blenheim Park SSSI, particularly in terms of air quality or hydrological impacts, in relation to this specific site</u></p>

			<p><u>and the cumulative impact of the three allocated sites in Woodstock.</u></p> <p><u>g) biodiversity enhancements including arrangements for future maintenance.</u></p> <p><u>h) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement and not cause harm to the Blenheim Park SSSI.</u></p> <p><u>i) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>j) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p> <p><u>k) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</u></p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM60	MAIN166 FMM84	Policy EW1d – Land north of Hill Rise, Woodstock	<p><u>Policy EW1d – Land north of Hill Rise, Woodstock (120 homes)</u></p> <p><u>Land to the north of Hill Rise, Woodstock to accommodate around 120 dwellings as a well-integrated and logical extension of the existing built form of the town.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing.</u></p> <p><u>b) ensuring that development is consistent with Policy EW1 in respect of the protection, promotion and conservation of the Blenheim Palace World Heritage Site (WHS) and its setting.</u></p> <p><u>c) landscape dominated design with the provision of appropriate measures to mitigate the potential landscape, visual and heritage impact of the development including the retention and strengthening of existing hedgerows, use of appropriate building heights and materials, retention of key views and the provision of structural planting and extensive areas semi-natural green space, with built development kept away from the eastern and northern parts of the site including where it adjoins the A44.</u></p> <p><u>d) provision of satisfactory vehicular accesses and appropriate pedestrian and cycle connections including appropriate accommodation of the existing public right of way through the site and provision of a safe and efficient means for bus services to terminate and turn at the site in forward gear.</u></p> <p><u>e) the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians</u></p>

			<p><u>and cyclists with good connectivity provided to adjoining areas and other key destinations.</u></p> <p><u>f) appropriate provision of and contributions towards supporting infrastructure;</u></p> <p><u>g) replacement/enhancement of the existing children’s play area and public open space adjacent to Rosamund Drive.</u></p> <p><u>h) the developer will be required to provide an assessment of any impacts on Blenheim Park SSSI, particularly in terms of air quality or hydrological impacts, in relation to this specific site and the cumulative impact of the three allocated sites in Woodstock.</u></p> <p><u>i) biodiversity enhancements including arrangements for future maintenance.</u></p> <p><u>j) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</u></p> <p><u>k) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>l) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p> <p><u>m) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</u></p>
--	--	--	--

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM61	MAIN169 FMM86	Policy EW1e – Land north Banbury Road, Woodstock	<p><u>Policy EW1e – Land north Banbury Road, Woodstock (180 homes)</u></p> <p><u>Land to the north of Banbury Road, Woodstock to accommodate around 180 dwellings as a well-integrated and logical extension of the existing built form of the town.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing.</u></p> <p><u>b) provision of satisfactory vehicular access from Banbury Road and appropriate pedestrian and cycle connections including incorporation of the existing public right of way across the site.</u></p> <p><u>c) the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas and other key destinations.</u></p> <p><u>d) appropriate provision of and contributions towards supporting infrastructure;</u></p> <p><u>e) ensuring that development is consistent with Policy EW1 in respect of the protection, promotion and conservation of the Blenheim Palace World Heritage Site (WHS) and its setting, including key views.</u></p> <p><u>f) landscape dominated design with the provision of appropriate measures to mitigate the potential landscape, visual and heritage impact of the development including the retention and strengthening of existing hedgerows, use of appropriate building heights and materials, retention of key views and the provision of structural planting and extensive areas semi-natural green space, with built development kept away from the western parts of the site. Particular regard must be had to the setting of the listed buildings on Banbury Road including</u></p>

			<p><u>the provision of a substantial landscape buffer.</u></p> <p><u>g) biodiversity enhancements including arrangements for future maintenance. Development will be required to make a positive contribution towards the adjoining Conservation Target Area (CTA).</u></p> <p><u>h) The developer will be required to provide an assessment of any impacts on Blenheim Park SSSI, particularly in terms of air quality or hydrological impacts, in relation to this specific site and the cumulative impact of the three allocated sites in Woodstock.</u></p> <p><u>i) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</u></p> <p><u>j) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>k) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p> <p><u>l) the developer will be required to set aside 5% of the developable plots for those wishing to undertake custom/self-build.</u></p>
MM62	MAIN172 FMM87	Policy EW1f – Land at Myrtle Farm, Long Hanborough	<p><u>Policy EW1f – Land at Myrtle Farm, Long Hanborough (50 homes)</u></p> <p><u>Land at Myrtle Farm to the east of Corn Hyde, Long Hanborough to accommodate around 50 dwellings as a well-integrated and logical extension of the existing built form of the village.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing.</u></p> <p><u>b) the provision of supporting transport infrastructure, including mitigating the impact of traffic associated with the development; the provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and</u></p>

			<p><u>infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists with good connectivity provided to adjoining areas and other key destinations including integrating with Long Hanborough village, Hanborough Station and interurban cycle routes.</u></p> <p><u>c) appropriate provision of and contributions towards supporting infrastructure;</u></p> <p><u>d) retention and enhancement of the existing vegetation along the northern site boundary to ensure effective screening of the development from wider views.</u></p> <p><u>e) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</u></p> <p><u>f) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>g) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p> <p><u>h) conserve and enhance the special interest, character and appearance of the Millwood End Conservation Area.</u></p>
MM63	MAIN175 FMM88	Policy EW1g – Land at Oliver’s Garage, Long Hanborough	<p><u>Policy EW1g – Land at Oliver’s Garage, Long Hanborough (25 homes)</u></p> <p><u>Land at Oliver’s Garage, Long Hanborough to accommodate a small high quality development of around 25 dwellings as a well-integrated and logical redevelopment of an existing use within the built area of the village.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing.</u></p> <p><u>b) making efficient use of the site through an appropriate density of development and innovative, high-quality design.</u></p>

			<p><u>c) appropriate provision of and contributions towards supporting infrastructure.</u></p> <p><u>d) consideration of any potential decontamination mitigation measures necessary as a result of the existing garage use of the site.</u></p> <p><u>e) provision of satisfactory vehicular access and supporting transport infrastructure, including mitigating the impact associated with the development; the provision provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists, with good connectivity provided to key destinations including integrating with Long Hanborough village, Hanborough Station and interurban cycle routes.</u></p> <p><u>f) connection to the mains sewerage network which includes infrastructure upgrades where required.</u></p> <p><u>g) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p>
MM64	MAIN178 FMM89	Policy EW1h – Former Stanton Harcourt Airfield	<p><u>Policy EW1h – Former Stanton Harcourt Airfield (50 homes)</u></p> <p><u>Land at the former Stanton Harcourt Airfield, Stanton Harcourt to accommodate a high quality development of around 50 dwellings as a well-integrated and logical redevelopment of an existing previously developed site adjacent to the existing settlement edge.</u></p> <p><u>Proposals for development should be consistent with the following:</u></p> <p><u>a) provision of a mix of house types and tenures including affordable housing in accordance with Policy H3 – Affordable Housing.</u></p> <p><u>b) provision of satisfactory vehicular access and supporting transport infrastructure, including mitigating the impact associated with the development; the provision provision of appropriate financial contributions towards LTP4 transport schemes; provision of appropriate public transport (services and infrastructure) serving the site; and provision of a comprehensive network for pedestrians and cyclists, with good connectivity provided to key destinations including integrating with Long Hanborough village, Hanborough Station and</u></p>

			<p><u>interurban cycle routes.</u></p> <p><u>c) appropriate provision of and contributions towards supporting infrastructure;</u></p> <p><u>d) positive incorporation of any defining site characteristics and features of historic significance to the former role of the site as an airfield.</u></p> <p><u>e) appropriate measures to ensure there are no potential issues arising from land contamination associated with the site and the adjoining landfill.</u></p> <p><u>f) appropriate measures to mitigate flood risk including the use of sustainable drainage methods to ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates. The sustainable drainage systems should be designed to provide a biodiversity enhancement.</u></p> <p><u>g) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.</u></p> <p><u>h) demonstrate the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings.</u></p> <p><u>i) conservation or enhancement of the special interest, character and appearance of the Conservation Area and significance of the adjoining Devil's Quoits scheduled monument and undertaking of an archaeological investigation of the site.</u></p>
--	--	--	---

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM65	MAIN182 FMM91	Policy EW1 – Blenheim World Heritage Site	<p><u>Policy EW1 – Blenheim World Heritage Site</u></p> <p>The exceptional cultural significance (Outstanding Universal Value) of the Blenheim World Heritage Site will be protected, promoted and conserved for current and future generations.</p> <p>Accordingly, proposals which conserve and enhance the attributes and components that comprise the Outstanding Universal Value of the Site, as identified in the Statement of Outstanding Universal Value Statement and in line with the Blenheim Palace World Heritage Site Management Plan, will be supported.</p> <p>In accordance with the National Planning Policy Framework, <u>great weight will be given to the conservation of the Outstanding Universal Value of the World Heritage Site and any harm or loss to its significance will require clear and convincing justification. development</u> Development proposals that would lead to substantial harm to or loss of those attributes and components of the Site will be unacceptable, unless it can be demonstrated that any such harm or loss is necessary to achieve substantial public benefit that outweigh that harm or loss. Such harm will be wholly exceptional. Where development proposals would lead to less than substantial harm to those attributes and components, that harm will be weighed against the public benefits of the proposals.</p> <p>When assessing the impact of a proposed development on the Outstanding Universal Value, great weight will be given to the conservation and enhancement of the Outstanding Universal Value and to the integrity and authenticity of the World Heritage Site.</p> <p>Consideration of impact will be made of proposals within, or potentially affecting, the World Heritage Site and its setting, including areas identified as being of special importance for the preservation of long distance views to and/or from the Site (as shown on the Blenheim Palace Management Plan). Particular regard will be given to the design quality of the proposal (including scale, form and massing), its relationship to context (including topography, built form, views, vistas and effect on the skyline) and the implications of the cumulative effect of changes.</p>

			<p>By helping to sustain and enhance the significance of the World Heritage Site, the Blenheim Palace Management Plan is a material consideration in assessing development proposals. Proposals relating to the World Heritage Site should seek to support the aims and objectives of the Management Plan.</p>
MM66	MAIN183 FMM92	Policy EW2 – Eynsham – Woodstock Sub-Area Strategy	<p><u>Policy EW2 – Eynsham – Woodstock Sub-Area Strategy</u></p> <p>The focus of new development will be Eynsham, Long Hanborough and Woodstock.</p> <p><u>The focus of new development will be Eynsham, Woodstock the Oxfordshire Cotswolds Garden Village and Long Hanborough.</u></p> <p>Development in these rural service centres will be of an appropriate scale and type that would help to reinforce/<u>create</u> the existing service centre role. Development elsewhere will be limited to meeting local housing, community and business needs and will be steered towards the larger villages.</p> <p>Proposals for development in the sub-area should be consistent with the strategy which includes:</p> <ul style="list-style-type: none"> - delivery of about 1,600 <u>5,596</u> new homes* to include affordable housing and homes designed to meet a range of different needs including older people. <u>This includes the provision of 2,750 (from 2021 – 2031) to meet the needs of Oxford City.</u> - <u>a Strategic Location for Growth (SLG) with a working assumption of around 2,200 homes to the north of the A40 near Eynsham to be delivered in the form of a new Garden Village (see Policy EW1a) and taken forward through an Area Action Plan (AAP).</u> - <u>a Strategic Development Area (SDA) of around 1,000 homes to the west of Eynsham (see Policy EW1b)</u> - <u>a non-strategic housing allocation of 300 homes on land east of Woodstock (see Policy EW1c)</u> - <u>a non-strategic housing allocation of 120 homes on land north of Hill Rise, Woodstock (see Policy EW1d)</u> - <u>a non-strategic housing allocation of 180 homes on land north of Banbury Road, Woodstock</u>

			<p><u>(see Policy EW1e)</u></p> <p><u>- a non-strategic housing allocation of 50 homes on land at Myrtle Farm, Long Hanborough (see Policy EW1f)</u></p> <p><u>- a non-strategic housing allocation of 25 homes on land at Oliver’s Garage, Long Hanborough (see Policy EW1g)</u></p> <p><u>- a non-strategic housing allocation of 50 homes on the former Stanton Harcourt Airfield (see Policy EW1h)</u></p> <p>- provision of additional business land focused primarily on the rural service centres with a particular focus on Eynsham to help meet future requirements and capitalise on the proximity of this sub-area to Oxford and the Oxfordshire ‘knowledge spine’. <u>This will include the provision of a new campus-style science park of around 40 ha to be delivered as an integral part of the Oxfordshire Cotswolds Garden Village.</u></p> <p>- support for rural employment opportunities including sustainable tourism and rural diversification.</p> <p>- seeking to alleviate traffic congestion issues on the A40 including through the provision of a new park and ride site at Eynsham and associated bus priority measures along the A40 as part of the Oxford Science Transit project.</p> <p>- enhancing public transport and pedestrian and cycle routes and infrastructure together with managing car parking to reduce car use for short journeys. <u>This will include a particular focus on facilitating the delivery of improvements to Hanborough Station and appropriate vehicular, pedestrian and cycle connections to the station including from the Garden Village.</u></p> <p>- ensuring that new development makes appropriate and timely provision for <u>essential necessary</u>-supporting infrastructure, including <u>new transport</u>, education, leisure, <u>health</u>, green infrastructure and other community facilities <u>in accordance with the IDP</u>.</p> <p><u>- maximising opportunities for enhancements within the Conservation Target Areas (CTAs).</u></p> <p><u>- masterplanning of strategic development areas/locations that takes adequate account of open space and green infrastructure networks and needs, and maximises opportunities to</u></p>
--	--	--	--

			<p><u>create and strengthen green infrastructure in accordance with the Council's Green Infrastructure Plan (to be prepared).</u></p> <ul style="list-style-type: none"> - protection of the Oxford Green Belt and <u>conservation and enhancement of the</u> Cotswolds Area of Outstanding Natural Beauty (AONB). -protection <u>conservation and enhancement</u> of historic and community assets including in particular the safeguarding of the Blenheim World Heritage Site and its setting (see Policy EW1). - working with the highway authority, the town council and other partners to reduce the impact of through traffic in local settlements including HGV movements through Woodstock. - seeking the retention and development of local services and community facilities throughout the sub-area including consideration of a new GP surgery for Woodstock on the site of the police station in Hensington Road. - ensuring Woodstock Town Centre remains vibrant through resisting the loss of shops and other town centre uses, and promoting an increase in the availability and efficient use of car parking provision in appropriate locations. - avoiding development which will increase the risk of flooding and working with partners such as the Environment Agency to deliver flood mitigation measures. - working with the River Thames Alliance, support tourism and leisure proposals which are sensitive to and where appropriate enhance the ecological, landscape and heritage value of the River Thames. <p>In the Lower Windrush Valley the Council will continue to work with the Lower Windrush Valley Project and County <u>Council as the</u> Minerals <u>Planning</u> Authority to identify appropriate opportunities for tourism and leisure development. Proposals which complement the rural character of the area will be supported and where possible deliver comprehensive long term recreational access, community or nature conservation benefits.</p> <p><u>* Note: In accordance with Policy H1, the figure of 5,596 homes is not an absolute target or a maximum ceiling to development.</u></p>
--	--	--	--

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM67	MAIN185 FMM94	Paragraphs 9.6.29a - 9.6.30	<p data-bbox="994 352 1099 379"><u>Housing</u></p> <p data-bbox="902 405 2040 651"><u>9.6.29a In recognition of the fact that the Burford - Charlbury sub-area is covered largely by the Cotswolds AONB, a more restrictive approach to new housing development will be applied than in the other four sub-areas. As set out in Policy H1, the amount of housing proposed for this sub-area in the plan period to 2031 (774 homes) is based on past completions and existing commitments only. No allowance is made for future speculative ‘windfall’ development (an allowance for which has been made in the other sub-areas).</u></p> <p data-bbox="902 691 2040 1007"><u>9.6.29b This does not mean that no further housing development will be permitted within the Burford – Charlbury sub-area but proposals will be considered on a case by case basis. It will need to be convincingly demonstrated that a scheme would give rise to benefits to the specific settlement or the sub-area (eg meeting identified local housing needs) and which would clearly outweigh any likely harms (eg heritage, landscape, impact on local services). Proposals will also need to accord with other relevant plan policies, in particular OS2, H1, H2 and EH1a. Housing proposals which constitute ‘major development’ will only be permitted in exceptional circumstances and where it can be demonstrated that they are in the public interest.</u></p> <p data-bbox="902 1046 2018 1182">9.6.30 In accordance with the overall strategy, additional housing development is likely to in this sub-area will be focused primarily at Burford and Charlbury as designated rural service centres. although given the relatively limited capacity of these settlements, some development is likely to be necessary in the larger villages.</p>

Main Modification Reference Number	Previous Reference Number/s	Paragraph/Policy	Main Modification
MM68	MAIN186 FMM95	Paragraph 9.6.34	9.6.34 It is also considered appropriate to include a ‘windfall’ allowance to cater for unidentified sites that are likely to come forward for housing over the period of the Local Plan. Based on past evidence, a reasonable estimate is that such schemes would provide 25 homes per year within the Burford – Charlbury sub-area over the remaining period of the Local Plan (2015 – 2031) thereby providing an additional 400 new homes.
MM69	MAIN200 FMM106	Policy BC1 – Burford – Charlbury Sub-Area Strategy	<p><u>Policy BC1 – Burford – Charlbury Sub-Area Strategy</u></p> <p>The focus of new development will be Burford and Charlbury.</p> <p><u>Burford and Charlbury are relatively constrained by their AONB location and are suitable for a modest level of development in accordance with Policy OS2.</u> Development in these rural service centres will therefore be of an appropriate scale and type that would help to reinforce the existing service centre role.</p> <p>Development elsewhere will be limited to meeting local housing, community and business needs and will be steered towards the larger villages</p> <p>Proposals for development in the sub-area should be consistent with the strategy which includes:</p> <ul style="list-style-type: none"> - delivery of about 800774 new homes* to include affordable housing and homes designed to meet a range of different needs including older people. - protectionconservation and enhancement of the Cotswolds Area of Outstanding Natural Beauty (AONB) - protectionconservation and enhancement of the historic environment and heritage assets - protection and enhancement of the Upper Windrush Valley and Wychwood Project Area - <u>maximising opportunities for enhancements within the Conservation Target Areas (CTAs)</u>

			<ul style="list-style-type: none"> - enhancing public transport and pedestrian and cycle routes and infrastructure together with managing car parking to reduce car use for short journeys - avoiding development which will increase the risk of flooding and working with partners such as the Environment Agency to deliver flood mitigation measures - support for additional small-scale employment opportunities including sustainable tourism and rural diversification - Ensuring development has access to superfast broadband to facilitate home-working - seeking the retention and development of local services and community facilities throughout the sub-area and ensuring Burford Town Centre remains vibrant through resisting the loss of shops and other town centre uses, and promoting an increase in the availability and efficient use of parking provision in appropriate locations - ensuring that new development makes appropriate and timely provision for necessary <u>essential</u> supporting infrastructure, including <u>new transport</u>, education, leisure<u>health</u>, green infrastructure and other community facilities <u>in accordance with the IDP</u>. <p>The Council will work in partnership with Oxfordshire County Council to consider appropriate measures to mitigate the impact of HGV traffic on Burford.</p> <p><u>* Note: In accordance with Policy H1, the figure of 774 homes is not an absolute target or a maximum ceiling to development.</u></p>
--	--	--	--