

Public Document Pack



Tuesday, 3 March 2026

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EXECUTIVE

You are summoned to a meeting of the Executive which will be held in Main Hall (Memorial Hall, Charlbury) - Charlbury Corner House and Memorial Hall on **Wednesday, 11 March 2026 at 2.00 pm.**



Giles Hughes
Chief Executive

To: Members of the Executive

Councillors: Andy Graham, Duncan Enright, Lidia Arciszewska, Hugo Ashton, Rachel Crouch, Andrew Prosser, Geoff Saul, Alaric Smith and Tim Sumner.

Recording of Proceedings – The law allows the public proceedings of Council, Executive, and Committee Meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted. By participating in this meeting, you are consenting to be filmed.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Democratic Services officers know prior to the start of the meeting.

AGENDA

- 1. Apologies for Absence**
To receive any apologies for absence from Members of the Executive. The quorum for the Executive is 3 Members.
- 2. Declarations of Interest**
To receive any declarations of interest from members of the Executive on any items to be considered at the meeting.
- 3. Minutes of Previous Meeting (Pages 9 - 20)**
To approve the minutes of the previous meeting, held on 11 February 2026.
- 4. Receipt of Announcements**
To receive any announcements from the Leader of the Council, Members of the Executive or the Chief Executive.
- 5. Participation of the Public**
Any member of the public, who is a registered elector in the District, is eligible to ask one question at the meeting, for up to three minutes, of the Leader of the Council, or any Member of the Executive on any issue that affects the district or its people.

Notice, together with a written copy of the question, must be provided to Democratic Services, either by email to:

democratic.services@westoxon.gov.uk

or by post to:

Democratic Services, West Oxfordshire District Council, Woodgreen, Witney OX28 1NB.

Questions are to be received no later than 2.00pm two clear working days before the meeting (e.g. for a Wednesday meeting, the deadline would be 2.00pm on the Friday before).

A response may be provided at the meeting, or within three clear working days of the meeting. If the topic of the question is not within the remit of the Council, advice will be provided on where best to direct the question.

The appropriate Executive Member will either respond verbally at the meeting or provide a written response which will be included in the minutes of the meeting.

- 6. Reports from the Overview and Scrutiny Committee**
To consider any reports or recommendations from the Overview and Scrutiny Committee, which meets on 4 March 2026.
- 7. Matters raised by Audit and Governance Committee**
There has been no meeting of the Audit and Governance Committee since the last meeting of the Executive.

8. **West Oxfordshire Local Plan 2043 - Spatial Options Consultation Summary Report and Local Development Scheme (LDS) Update (Pages 21 - 104)**

Purpose:

To consider the Local Plan Preferred Spatial Options Consultation Paper which is proposed to be published for consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Recommendations:

That the Executive resolves to:

1. Note the content of the report.
2. Agree that the Preferred Spatial Options Consultation Summary Report attached at Annex A be published online
3. Agree that the updated Local Development Scheme attached at Annex B be published online and made available in hard copy format in agreed 'deposit' locations across the District.

9. **National Planning Policy Framework: Proposed reforms and other changes to the planning system (Pages 105 - 218)**

Purpose:

To consider the Council's response to the Government's consultation on proposed changes to the National Planning Policy Framework (NPPF) and other aspects of the planning system.

Recommendation:

That the Executive resolves to:

1. Note the content of the report and agree that the suggested draft consultation response attached at Annex A is submitted to Government.

10. **Approach to commissioning 3 year SLA 2027 onwards (Pages 219 - 228)**

Purpose:

To outline the principles, application process and timeline for the commissioning of three-year Service Level Agreements for Community Grants covering the period 2027-2030.

Recommendations:

That the Executive resolves to:

1. Approve the principles and timeline as set out in Sections 3 and 4.
2. Agree an increase to the Base Budget of £53k per annum as part of the 2027-2028 budget setting process, and for subsequent years, bringing the total budget available to £555k over three years.
3. Delegate authority for oversight of the commissioning process to the Director of Place, in consultation with the Executive Member for Stronger Healthier Communities.

11. **Biodiversity duty report (Pages 229 - 274)**

Purpose:

To consider the West Oxfordshire District Council Biodiversity Duty Report, which must be published by the Council before 26 March 2026.

Recommendations:

That the Executive resolves to:

1. Note the content of the West Oxfordshire Biodiversity Duty Report attached at Annex A; and
2. Agree that the report be published before 26 March 2026 in accordance with legislative requirements.

12. **HomeseekerPlus Policy Review (Pages 275 - 294)**

Purpose:

The HomeseekerPlus Policy has been in place since 2016 and was last reviewed in 2022.

Due to legislative and other changes, the policy needs to be updated. It is considered good practice to consult the public and associated stakeholders on the new policy therefore the HomeseekerPlus partnership is seeking approval to consult and implement suggested changes.

Although there is no recommended or set timeframes for how often allocations policies should be reviewed, it is anticipated that this the newly reviewed HomeseekerPlus Policy will remain in place until after the completion of the Local Government Reorganisation.

Recommendations:

That the Executive resolves to:

1. Approve the draft Policy for public consultation.
2. Delegate authority to the Business Manager Housing in consultation with Executive Member for Housing and Social Care and Publica Executive Director – Operations to adopt the new policy following consideration of the consultation results.

13. **Kilkenny Car Park (Pages 295 - 308)**

Purpose:

To add Kilkenny Car Park to the West Oxfordshire District Council (Off-Street Parking Places) Order.

Recommendations:

That the Executive resolves to:

1. Add the Kilkenny Car Park to the West Oxfordshire District Council (Off-Street Parking Places) Order ('the Parking Order') to enable the Council to regulate and manage the use.
2. Delegate authority to the Executive Director for Corporate Services in consultation with the Executive Member for Environment to consider consultation feedback received in respect of the proposed amendments to the Parking Order and decide whether to make the variation to the Parking Order in whole or in part or to abandon the proposal.

14. **Corporate Enforcement Policy (Pages 309 - 346)**

Purpose:

To present Executive with a revised Corporate Enforcement Policy ('The Policy') for approval and adoption.

West Oxfordshire District Council ('the Council') is required to have an effective Corporate Enforcement Policy to enable Officers to investigate and take action to ensure individuals and businesses comply with the law.

The Policy sets out the legislative framework and principles the Council will abide by when undertaking investigations to mitigate the risk of legal challenge in Court.

The Policy demonstrates the Council's consideration of necessity, proportionality and public interest when deciding on enforcement action and demonstrates openness and transparency for residents, Councillors and employees.

Recommendations:

That the Executive resolves to:

1. Approve and adopt the Corporate Enforcement Policy attached to this report as Annex A.
2. Delegate authority to the Director of Governance and Regulatory Services to approve future minor amendments to the Policy, in consultation with the Leader of the Council, Head of Service Counter Fraud and Enforcement Unit, Relevant Heads of Service and the Head of Legal Services.

15. **Quarterly Finance Review Q3 (Pages 347 - 364)**

Purpose:

To detail the Council's financial performance for Quarter Three 2025-2026.

Recommendations:

That the Executive resolves to:

1. Note the Council's Financial Performance for Quarter Three 2025-2026
2. Delegate authority to the Director of Finance, in consultation with the Executive Member for Finance, to review earmarked reserves to mitigate against the financial risks identified in this report. See Sections 2.21 – 2.24.

16. **Quarterly Service Review Q3 (Pages 365 - 430)**

Purpose:

To provide details of the Council's operational performance at the end of 2025-26 Quarter Three (Q3).

Recommendation:

That the Executive Resolves to:

1. Note the 2025/26 Q3 service performance report.

17. **Review of Publica Members Agreement and Service Specifications (Pages 431 - 436)**

Purpose:

The purpose of this report is for the Executive to consider proposals for amendments and an extension to governance arrangements following the conclusion of the Publica Review. This includes the updating of service specifications, service agreements, the members agreement and articles of association.

Recommendations:

That the Executive resolves to:

1. Approve in principle the changes to the governance agreements set out in section 3 below.
2. Delegate authority to the Chief Executive, in consultation with the Leader, to finalise and enact through appropriate legal documentation, the detailed changes to the agreements, in line with principles agreed.

18. **Ubico Service Agreement (Pages 437 - 444)**

Purpose:

The proposal is to move to a single, common service agreement to be adopted by all Ubico shareholder councils and effective from April 2027, with council-specific service specifications appended. This approach will secure the delivery of service beyond the current contract end date on March 2027, retain local flexibility over service scope and standards and introduce consistency in legal structure, definitions, and core contractual provisions across the Ubico Shareholding partnership.

The proposed agreement updates terminology, reflects legislative change, standardises notice periods, and includes specific provisions to ensure continuity of services in the event of local government reorganisation. Importantly, it does not change the Shareholder Agreement or the Council's role as an owner of Ubico.

Adoption of the common Service Agreement will provide greater clarity, resilience and long-term planning certainty while retaining strong council control over service scope, cost and performance, within the existing shareholder governance framework.

Recommendations:

That the Executive resolves to:

1. Approve the Ubico Service Agreement in principle.
2. Delegate authority to Director of Place in consultation with The Leader of the Council, to:
 - a. Agree and approve the final wording of the Service Agreement before the current contract expires at the end of March 2027.
 - b. Agree and approve the final wording of the Lease Agreement
 - c. Agree and approve the updated Service Specification

19. **Response to government consultation on local government reorganisation in Oxfordshire (Pages 445 - 450)**

Purpose:

To seek delegated authority for the Chief Executive, in consultation with the Leader of the Council, to submit a response to the Government's statutory consultation on the three proposed options submitted for Local Government Reorganisation for Oxfordshire and West Berkshire including:

- One Unitary Council covering the whole area of Oxfordshire
- Two Unitary Councils: Oxford and Shires (comprising current areas of Cherwell District, Oxford City and West Oxfordshire District) and Ridgeway (comprising current areas of South Oxfordshire District, Vale of White Horse District and West Berkshire)
- Three Unitary Councils which includes a request to split existing district council areas between the three proposed new councils comprising the current areas of: Greater Oxford Council (Oxford City plus 15 parishes from Cherwell, 25 parishes from South Oxfordshire and 9 parishes from Vale of White Horse), Northern Oxfordshire Council (Cherwell less 15 parishes and West Oxfordshire), and Ridgeway Council (South Oxfordshire less 25 parishes, Vale of White Horse less 9 parishes, plus West Berkshire)

Recommendation:

That the Executive resolves to:

- I. Delegate authority to the Chief Executive Officer, in consultation with the Leader of the Council, to submit a response to the Government's statutory consultation on Local Government Reorganisation for Oxfordshire and West Berkshire on behalf of West Oxfordshire District Council.

(END)

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WEST OXFORDSHIRE DISTRICT COUNCIL

Minutes of the meeting of the

Executive

Held in the Council Chamber, Council Offices, Woodgreen, Witney, Oxfordshire OX28 1NB
at 2.00 pm on **Wednesday, 11 February 2026**

PRESENT

Councillors: Andy Graham, Duncan Enright, Hugo Ashton, Rachel Crouch, Andrew Prosser, Geoff Saul, Alaric Smith and Tim Sumner

Officers: Giles Hughes (Chief Executive Officer), Madhu Richards (Director of Finance), Andrea McCaskie (Director of Governance and Regulatory Services), Frank Wilson (Group Finance Director - Publica), Phil Martin (Director of Place), Claire Locke (Executive Director), Andrew Brown (Head of Democratic and Electoral Services), Anne Learmonth (Democratic Services Officer), Maria Harper (Democratic Services Assistant), Mathew Taylor (Democratic Services Officer), Georgina Dyer (Head of Finance), Mandy Fathers (Business Manager - Environmental, Welfare & Revenue Service), Si Pocock-Cluley (Environmental Services and Waste Transformation Lead) and Chris Hargraves (Head of Planning)

Other Councillors in attendance: Julian Cooper and David Melvin

453 Apologies for Absence

Apologies were received from Councillor Lidia Arciszewska, Executive Member for Environment.

454 Declarations of Interest

There were no declarations of interest.

455 Minutes of Previous Meeting

There were no amendments to the minutes of the previous meeting held on 14 January 2026.

The approval of the minutes was proposed by Councillor Andy Graham, Leader of the Council. Duncan Enright, Deputy Leader of the Council, seconded the proposal. The proposal was voted on and approved unanimously.

RESOLVED:

To approve the minutes of the previous meeting held on 14 January 2026.

456 Receipt of Announcements

Councillor Rachel Crouch, Executive Member for Stronger Healthy Communities, advised that thirty-four Parish, Town and District Councillors had undertaken the Mental Health Training

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provided by Mind. Councillor Crouch stated that there were three dates still available for the training and encouraged Councillors to attend.

457 Participation of the Public

There was no participation of the public.

458 Reports from the Overview and Scrutiny Committee

The Executive noted that the Overview and Scrutiny Committee had met on 4 February 2026. The responses of the Executive to the recommendations made by the Committee had been circulated and published prior to the meeting. Full details of the response could be viewed on the website.

With regards to the Nature Recovery Plan the Executive had agreed to both recommendations.

In the area of Mental Health initiatives, the Committee had made three recommendations. Rachel Crouch, Executive Member for Stronger Healthy Communities, addressed the responses to recommendations one and two. Councillor Crouch advised that recommendation one would be considered following the outcome of the Marmot Place Health research. The second recommendation would be agreed once the funding need had been identified and the current budget had been used in a targeted manner.

Councillor Andy Graham, the Leader of the Council, addressed the third recommendation on Mental Health on reviewing the reception arrangements at Woodgreen. Councillor Graham noted that this recommendation would be considered, however Welch Way was the Council's primary reception. Councillor Graham informed the Executive that visits in the month to Welch Way had been 778 with Woodgreen having received under 100 visits.

459 Matters raised by Audit and Governance Committee

The Audit and Governance Committee had met on 22 January 2026 and there had been no matters raised for the Executive to consider.

460 Budget 2026/27 & medium term financial strategy

Councillor Alaric Smith, Executive Member for Finance, introduced the report, the purpose of which was to provide an update on the budget for 2026/27 following the provisional government funding settlement on 17 December 2025. The report was to consider the following:

1. The Draft Base Budget for 2026/27
2. The Council's Capital Programme for 2026/27 to 2030/31

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3. The level of Council Tax for 2026/27
4. The Medium-Term Financial Strategy (MTFS)
5. The Capital Strategy 2026/27
6. The Investment Strategy 2026/27
7. The Treasury management Strategy 2026/27
8. The Responses from the Statutory Budget Consultation 2026/27
9. The Pay Policy Statement 2026/27

In his presentation Councillor Smith focussed on the following aspects of the report:

- Full Council would consider the budget for 2026/27 on 25 February 2026.
- The final draft had been updated with the provisional government funding settlement announced on 17 December 2025, and for updated Publica and Ubico contract sums, investment property information and Retained Business Rates.
- The strategy papers for Capital, Investment and Treasury Management had been reviewed by the Audit and Governance Committee on 22 January 2026 and were included in the report.
- The final Local Government Finance Settlement was published on 9 February 2026, and a supplementary briefing note had been published to address this. Councillor Smith advised that the government's methodology for the calculation of Business Rates pooling in the Funding Floor baseline had been adjusted, with the result that there was a reduction in funding of £2.318m over the three-year funding period, when compared to the provisional settlement. The Business Rates pooling gain was still included in Core Spending Power, but the methodology had changed, giving 50% to Counties and 50% to the districts. This had meant that there was a reduction in funding in years two and three. However, a new Adjustment Support grant introduced for 2026/27 ensured that no Council received less Core Spending Power than had been announced in the provisional settlement.
- The final draft budget resulted in a contribution to general fund reserves of £683,814 before growth requests and was balanced after growth requests.
- The table at section 2 of the report showed key movements in the budget from that proposed to the Executive in January. Changes had included: the reduction in the Ubico contract; the Publica contract in which a re-based cost model had been adopted; additional movements to earmarked reserves for the Waste and Environmental Services Project and the next phase of Local Government Reorganisation (LGR); the removal of cost of interest on external borrowing from the base budget.
- The Council proposed to invest in areas such as: management of the property portfolio; shared positions in Pollution Services, Tenancy Relations and Private Water Supplies; habitat improvements on Council land, species recovery projects; projects to prevent violence against women and girls; Environmental Officer and Field Worker posts; and a Planning Services Transformation Lead.
- Councillor Smith paid tribute to the Officers responsible for the budget, which he considered to be good in the circumstances faced by the Council.

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- Councillor Smith proposed the Executive accepted the recommendations shown in the report.

In the discussion Executive members noted and welcomed the budget and highlighted the inclusion of growth requests in their portfolios.

Councillor Hugo Ashton, Executive Member for Planning, drew the attention of the Executive to three areas in his portfolio: Increased capacity in project management for the Local Plan; increased capacity to manage infrastructure funds; and the extension to the Planning Transformation Lead role. Councillor Ashton also welcomed the capital funding allocated for improvements to lighting for parking in Burford.

Councillor Andrew Prosser, Executive Member for Climate Action and Nature Recovery, highlighted the work across local authorities towards the Nature Recovery Strategy. Councillor Prosser noted that the budget allowed delivery on the Strategy across the District including investment in officers to enable engagement with communities. Projects such as Coronation Orchards were examples of this work and had provided nature rich community assets.

Councillor Andy Graham, Leader of the Council, seconded the proposal and stated that the budget was a result of the diligent and detailed work of the Council's officers. Investments and improvement work on Council owned assets, such as at Elmfield, had ensured financial returns that had enabled the Council to continue to provide services to residents. In some other authorities Government funding shortfalls had meant cuts to services to manage deficits, however the Council had made no such cuts to services provided.

This was voted on and agreed unanimously.

RESOLVED:

That the Executive:

1. Noted the Parish Precepts and Tax Levels set out in Annex G.

Recommend to Council to:

1. Approve the General Fund Revenue Budget as Summarised in Annex A.
2. Approve the Updated Medium Term Financial Strategy in Annex B.
3. Approve the Capital Programme for 2026/27 to 2030/31 as set out in Annex C.
4. Approve the Council's Pay Policy Statement as set out in Annex I
5. Approve the Level of District Council Tax for 2026/27 for a Band D property of £134.38 as shown in Annexes D-G.

461 Salt Cross Area Action Plan (AAP)

Councillor Hugo Ashton, Executive Member for Planning, introduced the item, the purpose of which was to consider the formal adoption of the Salt Cross Area Action Plan (AAP).

In his presentation Councillor Ashton made the following points:

- Councillor Ashton expressed his gratitude to all of those that had been involved in this important milestone project. Councillor Ashton specifically mentioned: the community of Eynsham; those involved in the High Court Case and the Planning Team.
- The Salt Cross development was expected to anchor the current and Emerging Local Plans.
- The approval of the recommendations would allow a promotor to submit an outline planning application to progress the project to the next stage.
- Councillor Ashton gave background to the process from the initial work on the Area Action Plan (AAP) in 2018 through to publication of the Inspector's Report in January 2026 which had outlined her overall conclusions and the main modifications needed to make the policy sound.
- Main modifications could be seen in Annex A of the report and those modifications specific to Policy 2 could be seen in Annex B.
- The Council had discretion to make minor changes to the policy that did not materially effect the content, these could be seen in Annex C.
- Annex D was a composite version of the AAP and incorporated all modifications from Annexes A, B and C.
- It was important to note that the recommendations were binding on the Council and must either be accepted in whole or not at all.
- Councillor Ashton proposed accepting the recommendations included in the report.

The alternative options that were contained in the report were:

- The District Council could choose not to formally adopt the Salt Cross Area Action Plan (AAP) but this would mean there would be no detailed planning policy framework in place against which to consider any current or future planning applications pertaining to Salt Cross Garden Village. This would create a significant degree of uncertainty and lead to further delays with delivery.

Councillor Andy Graham, Leader of the Council, seconded the proposal and stated that the Salt Cross project had taken many years to come to fruition, through several administrations. It would deliver over 2,000 high quality homes at net-zero and would set a template for the

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whole of the UK for such developments. The development would benefit people's lives in many ways including energy use.

Councillor Duncan Enright, Deputy Leader of the Council, commented that it was welcome that the Salt Cross development would be a mixed development of housing and employment areas.

Councillor Andrew Prosser suggested that Salt Cross would be a nationally important exemplar project and it was therefore important to ensure that the project continued to be developed in the correct manner.

A non-Executive Member in attendance queried how quickly the properties at Salt Cross would contribute towards the Council's housing supply in terms of the Council's planning obligations. It was noted that the properties would contribute to the plan in the longer term, however the exact date was hard to quantify.

This was voted on and agreed unanimously.

RESOLVED:

That the Executive recommended to Council to:

1. Accept the Inspectors' recommendations regarding the Main Modifications required to make the AAP sound as set out at Annex A and Annex B;
2. Agree the incorporation of the additional modifications as set out at Annex C;
3. Adopt the Salt Cross Area Action Plan (AAP) attached at Annex D as a development plan document, incorporating all of the Main Modifications recommended by the Inspectors at Annex A and Annex B, together with the additional modifications at Annex C, in accordance with Regulation 26 of the Town and Country Planning (Local Planning) Regulations 2012;
4. Authorise the Head of Planning in consultation with the Executive Member for Planning, prior to the publication of the adopted Salt Cross AAP, to correct any minor spelling, grammatical or typographical errors together with any improvements from a presentational perspective including paragraph and policy numbering;
5. Note that the adoption of the Salt Cross AAP will supersede certain aspects of the West Oxfordshire Local Plan 2031 insofar as they relate to Salt Cross with immediate effect, specifically; Figure 3.2 of the AAP updates Figure 9.5e of the Local Plan, AAP Policy 16 supersedes Local Plan Policy T4 in respect of car parking standards and AAP Policy 25 supersedes Local Plan Policy H5 in respect of custom and self-build housing.

462 Street Cleansing Vehicle Procurement

Councillor Andrew Prosser, Executive Member for Climate Action and Nature Recovery, introduced the item the purpose of which was to seek approval to procure vehicles for the Street Cleansing service.

In his presentation Councillor Prosser made the following points:

- The report had included the alternative options for vehicle procurement, and these were:
 - Retain Existing Vehicles
Advantages: Avoided immediate capital expenditure.
Disadvantages: This option significantly increased the risk of service failure due to mechanical breakdowns. Maintenance costs for aging sweepers were increasing, and downtime impacted operational efficiency and resident satisfaction.
 - Procure two Fossil Fuel-Powered Sweepers
Advantages: Fossil fuel-powered vehicles were widely available and had lower upfront costs compared to electric alternatives.
Disadvantages: This option did not support the Council's commitment to achieving net-zero carbon emissions by 2030. Continuing with this technology would lock in higher emissions for the lifespan of the vehicles.
 - Explore Hydrogen or Other Emerging Technologies
Advantages: Hydrogen-powered vehicles offered zero tailpipe emissions and could align with long-term sustainability goals.
Disadvantages: Hydrogen sweepers were not readily available in the current market, and infrastructure requirements would be significantly more complex and costly than electric charging solutions. This option was therefore not viable at present.
- After evaluating these alternatives, the proposed approach, to replace the smaller electric sweeper on a like-for-like basis now and delegate the decision on the larger sweeper pending schedule reviews and depot capacity identification, represented the most practical and strategic choice. This approach continued the delivery of environmental benefits, aligned with the Council's climate commitments, and maintained
- The small electric-powered vehicle-mounted road sweeper was a replacement vehicle.
- Procurement of the larger electric vehicle would be delegated to the Director of Place in consultation with the relevant Executive Members as further trials were required. The trials would include exploration of the schedules and distances required to be covered by the vehicle.

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Councillor Alaric Smith, Executive Member for Finance, seconded the proposal and stated that it was important to progress the replacement of the fleet where necessary in line with the Council's green objectives.

This was voted on and agreed unanimously.

RESOLVED:

That the Executive:

1. Approved the use of capital funding of £260,000 to procure one small (~3.5t) electric-powered vehicle-mounted road sweeper on a like-for-like basis.
2. Delegated authority to the Director of Place, in consultation with the Executive Member for Environmental Services, the Executive Member for Finance, and the Director of Finance, to:
 - a) Review the sweeping re-scheduling report and assess depot capacity following a further electric vehicle trial.
 - b) Approve the use of capital funding of £235,000 - £435,000 to procure one large (~16t) vehicle-mounted road sweeper, based on the outcome of the review and trial.
 - c) Approve the use of capital funding of £15,000 to procure any necessary charging infrastructure if an electric option is selected for the larger sweeper.

463 Investment in Public Conveniences

Councillor Alaric Smith, Executive Member for Finance, introduced the item, the purpose of which was to seek funding for the renovation, redesign and repair of the Public Conveniences to be retained within the district to ensure a high-quality service for the customer.

In his presentation Councillor Smith made the following points:

- Following consultation, the Town or Parish Councils had not taken the option to take on facilities.
- Seven public conveniences would remain open. Those that would remain open were located where they were most needed and would be improved.
- The remainder facilities would be closed on 31 March 2026, and signage would be displayed to advise of the closures.
- The focus of renovation, redesign and repair works would be on the remaining well used facilities. The improvements would be on a direct access design which was less likely to attract anti-social behaviour, were more capable of being easily cleaned, were gender-neutral and more accessible.
- Cashless payment would also be introduced as part of the work.
- The current cost to the Council of providing public conveniences was £269,747. This cost was reduced by £114,7545 by the closures proposed. The closures also would

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avoid repair costs on closed facilities estimated to be £87,700 over the next three years.

The alternative option was that the Executive could have decided not to invest in the retained facilities but unless repairs were carried out the condition would deteriorate further.

Councillor Andy Graham, Leader of the Council, seconded the proposal and advised that a further report would be brought to the Executive on the proposals for disposal of the closed assets. Councillor Graham noted that this process was an example of the Council making assessment of the use of its assets and the use did change over time.

Councillor Hugo Ashton, Executive Member for Planning, highlighted the importance of the upgrades for the visitor economy and welcomed the addition of cashless payment which would improve access. Councillor Ashton suggested that it would be appropriate for the Council to consider increasing charges in the future.

A non-Executive Member present requested that officers reconsider the detail of the facilities at Kilkenny Country Park. The Member also requested that the returns from the sales of the assets being disposed of be earmarked to improvements works at the remaining public conveniences.

This was voted on and agreed unanimously.

RESOLVED:

That the Executive:

1. Allocated funding of £532,140 within the capital programme for 2026/27 to enable the delivery of Option 2 - redesign, renovation and repair of public conveniences at Langdale Gate in Witney, Guildenford and High Street in Burford, Bampton Town Hall, New Street in Chipping Norton, Hensington Road in Woodstock and Kilkenny Country Park, and to introduce cashless payment at these sites.
2. Delegated authority to the Executive Director – Corporate Services in consultation with the Director of Finance and the Executive Members for Finance and for Environment, to agree the detailed design and improvements and to award the contract.

464 Long Term Council Tax Empty Property Premium Exemption of Proposed Demolition Properties

Councillor Alaric Smith, Executive Member for Finance, introduced the item, the purpose of which was to consider the removal of the Long-Term Empty Property Premium for Cottsway owned properties that were due to be demolished.

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In his presentation Councillor Smith made the following points:

- Government had delegated powers to local authorities to incentivise property owners to bring empty properties back into use by introducing high premiums for Council Tax when they remain empty after two years. The maximum permitted increases to Council Tax premiums in such cases could be seen at section 2.3 of the report.
- Cottsway Housing were undergoing a programme of redevelopment with some of their housing stock at Evenlode Close, Charlbury, Shakenoak, North Leigh and Spareacre Lane and Mill Street in Eynsham. These three sites were formerly sheltered accommodation which would be demolished and redeveloped.
- It had seemed inappropriate to penalise the social housing landlord who had advanced plans to redevelop these aging sites and it was proposed to exempt them from the premium.
- Despite the exemption the sites would be kept under review by officers and an annual update report would be submitted to the Director of Finance.

The alternative option considered in the report was that the Executive could decide not to remove the long-term empty premiums already applied for 2025/26 or those due in 2026/27 from the properties of the three sites.

Councillor Geoff Saul, Executive Member for Housing and Social Care, seconded the item and noted that Cottsway had already redeveloped such sites in Chipping Norton and Witney and it did not make sense to penalise them for taking older properties out of use with the aim of redeveloping them for better use. In addition, Councillor Saul suggested that the money from the exemption could be used for such a redevelopment.

This was voted and approved unanimously.

RESOLVED:

That the Executive:

1. Delegated responsibility to the Director of Finance in consultation with the Executive Member for Finance and Executive Member for Housing and Social Care to remove, where it can be shown this will expedite the delivery of new social and affordable rent homes, the Long Term Empty Property Premiums for the properties set out in the report and other properties for registered providers that meet the same criteria; and,
2. Noted that any removal of the Empty Property Premium is reviewed at least every twelve months to ensure that progress on redevelopment is being made.

The Meeting closed at 3.04 pm

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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>WEST OXFORDSHIRE LOCAL PLAN PREFERRED SPATIAL OPTIONS CONSULTATION</p>
<p>Wards affected</p>	<p>ALL</p>
<p>Accountable member</p>	<p>Cllr Hugo Ashton – Executive Member for Planning Email: hugo.ashton@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Andrew Thomson – Planning Policy Manager Email: andrew.thomson@westoxon.gov.uk</p>
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<p>Summary/Purpose</p>	<p>To consider the Local Plan Preferred Spatial Options Consultation Paper which is proposed to be published for consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
<p>Annexes</p>	<p>Annex A – Preferred Spatial Options Consultation Summary Report (February 2026) Annex B – Updated Local Development Scheme – LDS (February 2026)</p>
<p>Recommendation(s)</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> 1. Note the content of the report. 2. Agree that the Preferred Spatial Options Consultation Summary Report attached at Annex A be published online. 3. Agree that the updated Local Development Scheme attached at Annex B be published online and made available in hard copy format in agreed ‘deposit’ locations across the District.
<p>Corporate priorities</p>	<p>The preparation of a new Local Plan for West Oxfordshire will help to support all of the Council’s corporate priorities including:</p> <ul style="list-style-type: none"> • Putting Residents First • Enabling a Good Quality of Life for All

	<ul style="list-style-type: none"> • Creating a Better Environment for People and Wildlife • Responding to the Climate and Ecological Emergency • Working Together for West Oxfordshire
Key Decision	NO
Exempt	NO
Consultees/ Consultation	<p>The emerging draft Local Plan has been the subject of extensive public consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>Most recently, this included public consultation on preferred Spatial options from 3 November – 22 December 2025.</p> <p>The Council has now concluded the regulation 18 consultation for the plan making stage of the plan making process.</p> <p>All comments received through consultation will now inform the final drafting of policies and further evidence gathering and analysis to support the Draft Local Plan 2043</p> <p>The Council will move towards the formal publication of a full draft Local Plan in June 2026 which will be published for a statutory 6-week period of public consultation before being submitted to the Planning Inspectorate for independent examination.</p>

1. INTRODUCTION

1.1 Members will be aware that the District Council is producing a new Local Plan to replace the current Local Plan adopted in September 2018.

1.2 The purpose of this report is twofold:

- To consider the feedback received to the most recent Local Plan preferred Spatial options consultation in October/December 2025 (in respect of the plan period, settlement hierarchy, spatial strategy and preferred locations for development) as set out in the consultation summary report attached at Annex A.
- To consider the timetable for progressing the Local Plan through to formal publication under Regulation 19 and of the Town and Country Planning (Local Planning) (England) Regulations 2012 as set out in the updated Local Development Scheme (LDS) attached at Annex B.

2. PREFERRED POLICY OPTIONS – OVERVIEW OF CONSULTATION FEEDBACK

2.1 The emerging draft Local Plan has been the subject of extensive stakeholder engagement, with four major public consultations undertaken between 2022 and 2025. The most recent consultation on Preferred Spatial Options place from 3 November to 22 December 2025.

2.2 The most recent spatial options included consultation on a revised settlement hierarchy, updated spatial strategy and a series of preferred locations to meet the districts housing and employment needs up to 2043.

2.3 The consultation comprised a combination of online digital material and a series of in-person events. It was very successful with over 2,200 responses to consultation questions from approximately 900 individuals and organisations.

2.4 A summary report of the consultation has been prepared and is attached at Annex A.

2.5 Whilst generally, the feedback was positive, a number of clear themes and areas of potential concern have emerged. Those issues of direct relevance to the Draft Plan consultation are briefly summarised below.

- **Plan Period**

Stakeholders expressed support for extended plan period to 2043 to ensure the Local Plan complies with National Policy.

- **Settlement Hierarchy**

Many stakeholders have questioned the proposed categorisation of settlements in the Local Plan with many requesting recategorisation of settlements on the basis of their size and function and the availability of services and facilities within those communities. A number of stakeholders have suggested the introduction of additional tiers into the hierarchy, to reflect environmental constraints such as their location within the Cotswolds National Landscape.

- **Spatial Strategy**

Although the proposed Spatial Strategy is largely supported, particularly the focus of development at principal settlements and in well-connected locations, widespread concern was expressed in relation to the availability and delivery of infrastructure across the district. Key elements of infrastructure that stakeholders remain concerned of include sewerage, education, healthcare, transport and energy. The strategy must include provision for infrastructure to be delivered in a timely manner.

Stakeholders reflected on the proposed scales of development (strategic, large, medium and small) included in the Local Plan. Many consider proposed development scales to be too restrictive, in that they could limit sustainable development proposals in the future, while others wish to see more clarity in terms of what proposed development scales could have in terms of cumulative development in communities.

- **Proposed Allocations**

Many stakeholders expressed concern about proposed allocations in the Local Plan due to the scale of proposed development and potential impacts on communities, including infrastructure, environment and heritage impacts. Widespread support was expressed by developers and agents about the number and scale of preferred locations for development.

2.6 As these are key aspects of the overall Local Plan, further work is now being undertaken to respond to these representations and to further develop policy and supporting evidence to, feed into the Regulation 19 Draft Local Plan to be published in the summer.

3. LOCAL PLAN TIMETABLE

- 3.1** The Council's most recently published Local Plan timetable is set out in its Local Development Scheme (LDS) published in October 2025. It was prepared on the basis that the Regulation 19 consultation would be undertaken in May 2026.
- 3.2** As a result of the decision to introduce the additional Regulation 18 stage of consultation on the preferred spatial options and due to the significant additional work required to analyse responses and undertake further evidence gathering in support of the Draft Local Plan, it has been decided to push back Regulation 19 consultation until June 2026.
- 3.3** A revised LDS has therefore been prepared and is attached at Annex B.
- 3.4** In terms of the Local Plan, the key dates to note are now as follows:
- Regulation 19 Draft Local Plan consultation - June 2026
 - Submission - December 2026
- 3.5** In preparing the updated LDS, Officers have also taken the opportunity to update the key dates in relation to the Salt Cross Garden Village Area Action Plan (AAP) and also the latest position regarding Neighbourhood Planning.

4. NEXT STEPS

- 4.1** By way of next steps, Officers propose to publish the Preferred Spatial Options Consultation Summary Report (Annex A) online as soon as possible.
- 4.2** To publish the updated Local Development Scheme on the council's website.

5. ALTERNATIVE OPTIONS

- 5.1** The District Council could choose not to progress with an update of the Local Plan. However, local authorities are required to keep plans up to date, typically reviewing them every 5-years or so.

6. FINANCIAL IMPLICATIONS

- 6.1** The preparation and adoption of a new Local Plan has significant financial implications with provision for this having been made through the District Council's budget setting process.

7. LEGAL IMPLICATIONS

- 7.1** The Local Plan is being prepared in accordance with legislative requirements and when considered at examination, the appointed Planning Inspector will determine whether or not the District Council has fulfilled those requirements. Independent legal advice will be sought as part of this process.

8. RISK ASSESSMENT

- 8.1** The report presents no significant risks.

9. EQUALITIES IMPACT

9.1 The Local Plan 2043 is supported by an integrated health and equality impact assessment (HEIA).

10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

10.1 The climate and ecological emergencies form a central component of the emerging draft local plan and have been influential factors in the selection of preferred spatial options outlined in Annex B.

11. BACKGROUND PAPERS

11.1 None.



West Oxfordshire Local Plan 2041

Preferred Spatial Options Consultation

Consultation Summary Report

March 2026



WEST OXFORDSHIRE
DISTRICT COUNCIL

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Introduction

- I.1 The Council is preparing a new Local Plan which will help shape the future of West Oxfordshire to 2043. Having an up-to-date plan in place is vital because it provides a vision and framework to guide decisions on how, where and when development can come forward and how we can protect and enhance our surroundings for current and future generations.
- I.2 Preparing a Local Plan falls into two main stages:
- **Plan preparation** (known as the Regulation 18 stage) when the Council carries out informal engagement on the potential scope and content of the plan and explores different options to help identify a preferred approach.
 - **Publication** (known as the Regulation 19 stage) when the Council carries out formal consultation on the final draft version of the plan which it considers to be 'sound' and intends to submit for examination.
- I.3 The Council is currently at the Regulation 18 plan-preparation stage and has held separate public consultations to date:
- In August 2022, an initial scoping consultation took place, seeking general views on the potential areas of focus for the new Local Plan.
 - Next, in August 2023, a further consultation 'Your Place, Your Plan' took place seeking views on draft local plan objectives, the potential pattern of development and potential sites, ideas and opportunities.
 - Then, in June 2025, we undertook a third consultation, seeking views and opinions on the draft 'Preferred Policy Options Paper'.
 - Recently, we held a fourth consultation, seeking views and opinions on the draft 'Preferred Spatial Options Paper'.
- I.4 The purpose of this report is to provide a detailed overview of the fourth consultation including how and when it took place and the main messages arising from the responses that we received.
- I.5 The document provides a summary of key messages received through the consultation. It does not set out the council's response to the consultation findings.
- I.6 The responses to all four previous consultation stages will be taken into account by Officers as they prepare the final Regulation 19 draft version of the Local Plan in mid-2026.

Consultation Overview

1.7 The Preferred Policy Options Consultation was held over a 6-week period from 3rd November – 22nd December 2025.

1.8 We asked for your views on:

- **Extending the plan period to 2043**
- **A revised settlement hierarchy**
- **Whether previously allocated sites should be refreshed and updated**
- **New potential development areas**

1.9 The consultation comprised a mixture of online material via the Council's digital engagement platform and a number of 'in-person' events as detailed below.

Public Exhibitions:

- Chipping Norton Public Exhibition – 11th November 2025
- Tackley Public Exhibition – 13th November 2025
- Witney Exhibition – 18th November 2025
- Long Hanborough Public Exhibition – 20th November 2025
- Brize Norton Public Exhibition – 25th November 2025
- Bampton Public Exhibition – 26th November 2025
- Milton-Under-Wychwood Public Exhibition – 2nd December 2025
- Standlake Public Exhibition – 9th December 2025

1.10 The consultation generated a total of almost 2260 comments from around 880 individuals and organisations by email and via the consultation platform.

1.11 Around 190 comments were received from 139 individuals and organisations via the consultation map.

1.12 The sections below summarise the comments that we received in relation to each aspect of the draft Preferred Spatial Options Paper.

Draft Spatial Policy Questions

Question 1 – Do you support an extended Local Plan end date of 2043?

Key matters arising from feedback:

- **Extension of the plan period is generally supported**
- **There is a dependency on infrastructure that is insufficient and not currently deliverable**
- **Housing numbers are seen as too high and the growth model is unrealistic**

- 2.1 The majority of comments, from a range of respondents, indicate support for the extension of the Local Plan to 2043, with some supporting a longer extension to 2045 or for twenty years.
- 2.2 Support for the extension of the plan period includes reasons such as better alignment with NPPF requirements, better long-term strategic planning and providing certainty for infrastructure.
- 2.3 Comments also suggest a need for flexibility and robust evidence, ensuring sites are deliverable and support for strategic sites and a spread of small/medium sites.
- 2.4 While the extension is generally supported, comments suggest that this is only if certain conditions are met, with concerns surrounding transport, a need for infrastructure first, housing numbers and above average growth.
- 2.5 Lack of, or poor, infrastructure is the most frequently cited concern, with over-capacity sewage systems, flooding risks, road congestion, parking pressures, GP and dentist capacity, bus and rail service limitation and sustainability particularly highlighted, with calls for infrastructure to be guaranteed first.
- 2.6 It is noted that these concerns are particularly highlighted by respondents in relation to the settlements of Stonesfield, Ascott-under-Wychwood, Bampton, Minster Lovell and Charlbury where comments also indicate concerns about heritage and settlement identity.
- 2.7 Comments which oppose the extension period of the Local Plan cite reasons such as the increase of housing numbers by 1,810, which is considered to be unacceptable and unachievable. Other opposition comments suggest concerns of speculative development if housing targets cannot realistically be met, risks of over development and concerns regarding excessive pressure due to Oxford City's unmet housing need.
- 2.8 Additionally, concerns are expressed about potential future local government reorganisation and a perceived lack of trust in WODC acting on public comments, with concerns that the plan will not be respected or implemented.
- 2.9 Some comments have indicated a criticism of the consultation process and a perceived lack of transparency, with respondents suggesting that there was insufficient time to review the documents, a lack of local consultation events in key settlements, maps which did not show

full development site boundaries and a feeling that public comments will not be meaningfully considered.

- 2.10 Alternative approaches suggested by comments include better use of brownfield land, repurposing unused buildings and land, increasing densities in towns, creating more affordable housing and housing tailored to older people and limiting develop-led growth in rural areas.

Question 2 - Do you support the concept of introducing an additional tier into the Local Plan settlement hierarchy to distinguish between large and medium-sized villages? What are your reasons?

Key matters arising from feedback:

- **There is broad support for adding an extra tier but there is concern about how villages are classified**
- **Infrastructure capacity and environmental constraints are highlighted - especially concerning the Cotswolds National Landscape and sewage/flooding**
- **How to distribute growth fairly and sustainably, between larger service centres and smaller villages, is questioned**

- 3.1 Comments indicate strong support for the introduction of an additional tier, with many agreeing that distinguishing between large and medium villages is more realistic and helps guide appropriate development levels, helping to protect small and less sustainable settlements from excessive growth.
- 3.2 However, concerns are raised about how the new tiering is applied and the implications for development.
- 3.3 There are repeated concerns that the new hierarchy fails to reflect statutory protections for settlements within the Cotswolds National Landscape (CNL) and comments call for settlements within the CNL to be placed in lower tiers or for a sub-category to be created for CNL settlements.
- 3.4 Linked to this are comments highlighting that the NPPF restricts major development in the CNL and that failure to incorporate CNL considerations risks legal challenges and unsoundness of the Local Plan.
- 3.5 Comments indicate concerns about the way in which settlements were allocated to the tiers, with criticism of the Settlement Sustainability Report's (SSR) over reliance on population thresholds and insufficient weighting for transport connectivity, sewerage and drainage infrastructure, flood risk, recent development pressure and realistic access to local facilities.
- 3.6 Additionally, comments express that the methodology for the SSR seems too simplistic or based on desktop research that misrepresents reality.

- 3.7 Comments suggest concerns from respondents that being placed in a higher tier will mean more development without infrastructure improvements, with issues raised regarding overloaded sewage systems, limited public transport, inadequate roads, insufficient school places and poor utilities.
- 3.8 This has led to calls for the Local Plan to make infrastructure constraints an explicit criterion and require developers to fund necessary upgrades.
- 3.9 Comments indicate a dispute regarding the tiering of individual villages, particularly in Stonesfield, Enstone, Ascott-under-Wychwood, Curbridge, Fulbrook, Bladon and Stanton Harcourt. Respondents have raised concerns including settlement scores not aligning with ‘real-world conditions’, inconsistencies compared to neighbouring villages and classification leading to unfair expectations for development.
- 3.10 Conversely, some comments express concern regarding small village risk stagnation, with the risk of them becoming exclusively for wealthier/older residents. These comments highlight that modest development can support infrastructure such as schools, shops and bus routes and maintain community vitality.
- 3.11 Support for ‘20-minute Neighbourhoods’ and recognising clusters of villages that function collectively are also emphasised by comments.

Question 3 – Based on the proposed five-tiered approach, do you think that the settlements listed in Table 2 above have been classified in the correct tier?

Key matters arising from feedback:

- **There is strong disagreement with settlement tier classifications for specific settlements**
- **Concerns about infrastructure are evident and calls for infrastructure before development are made**
- **It is considered that there are flaws in the Settlement Sustainability Report and HELAA assessment**
- **CNL protections are thought to not have been adequately considered and there are calls for CNL settlements to have their own tier in the settlement hierarchy**

- 4.1 Comments generally support the overall five-tier system, with Tier 1 settlements and new settlements like Salt Cross Garden Village supported, along with development along the A40 and A44 strategic corridors. Comments indicate that developers generally support classifications that allow more growth.
- 4.2 Many comments express strong disagreement regarding the tiering of specific settlements, citing that the hierarchy is too dependent on population size, insufficiently weighted for actual service provision and does not adequately consider overstretched services such as schools, GPs and sewage systems, the presence of sustainable transport or Cotswolds

National Landscape (CNL) protections. Comments have also suggested the sustainability matrix contains errors and a re-evaluation of scorings is needed.

- 4.3 Comments indicate that many Tier 2 and 3 classifications are challenged for reasons including limited or unreliable public transport, high car-dependency and over-valued train station presence.
- 4.4 Calls are made for infrastructure to be secured before the expansion of settlements and Grampian-style conditions to be imposed where needed.
- 4.5 There are calls for villages within the CNL to be classed separately as the NPPF prohibits major development in such areas unless exceptional circumstances and public interest are proven. Commenters from villages that repeatedly cite concerns regarding the CNL includes Stonesfield, Ascott-under-Wychwood, Fulbrook, Combe, Enstone, Milton-under-Wychwood and Shipton-under-Wychwood. Comments suggest the Local Plan currently fails to apply CNL restrictions consistently.
- 4.6 Comments, including from the Cotswold National Landscape Board, propose a separate CNL settlement category, or a “Tier 3A / 4A” specifically for CNL villages.
- 4.7 Repeated comments highlight strong concern regarding infrastructure constraints particularly relating to sewage overflows, water pressure issues, flooding and run-off, narrow rural road networks and the over-capacity GP surgeries and schools. Calls are made for new development to only be allowed where infrastructure exists or upgrades are guaranteed.
- 4.8 Comments strongly suggest that Stonesfield is incorrectly classified in the hierarchy, with repeated concerns that it should be classified as a Tier 4 settlement as opposed to a Tier 3 settlement. Reasons provided for this include the settlement being entirely within the CNL, limited amenities, public transport and employment, narrow lanes with no A/B roads, sewerage problems, landscape sensitivity and a housing needs assessment conducted for the draft Neighbourhood Plan demonstrating a need for only 4-5 affordable homes.
- 4.9 A minority of comments indicate support for Stonesfield as a Tier 3 village, with school viability and attracting families highlighted.
- 4.10 Comments additionally indicate a strong opposition to Long Hanborough being classified as a Tier 2 Service Centre. Objections include the railway station presence being overstated, low levels of public transport use, limited shops and amenities, an over-capacity GP surgery, congested roads and disproportionate recent growth.
- 4.11 Long Hanborough’s continued designation as a Tier 2 Service Centre is supported by some developers, citing connectivity and future growth potential.
- 4.12 Comments suggest mixed views relating to Bampton’s continued classification as a Tier 2 Service Centre.
- 4.13 Comments from developers indicate support for this classification.

- 4.14 There are repeated concerns from residents of Bampton, with comments highlighting a flooding and run-off history, limited public transport, an at-capacity sewage plant, a congested 'medieval' road layout and a practical inability to accommodate growth. Calls are strongly made for Bampton to be classified as a lower or sub-tier.
- 4.15 There are calls from a small number of commenters for Kingham to be reclassified as a Tier 3 settlement for reasons including the rail station, local services and connectivity.
- 4.16 One comment suggests that Ducklington should be upgraded to a Tier 2 Service Centre, due to a range of facilities including a new supermarket and a petrol filling station and its close proximity to Witney.
- 4.17 Some concerns are raised about HELAA Site Assessments, with objections indicating that they ignore CNL constraints for many CNL sites, fail to assess cumulative impact, send misleading signals to developers and include site previously refused on appeal.
- 4.18 Support is demonstrated for the use of brown-field sites, the protection of green-field and CNL sites and the avoidance of exploiting cumulative loopholes.

Question 4 – Do you support the four proposed scales of residential development (small 1–10 units, medium 11–50 units, large 51–300 units and strategic 300+ units)? What could be the implications of defining different scales of development?

Key matters arising from feedback:

- **The thresholds for the development Scales are seen as arbitrary or too rigid**
- **The settlement hierarchy and development scales are not thought to be aligned with local variation**
- **There is concern about cumulative impact and infrastructure capacity**

- 5.1 Comments indicate general support for the proposed development scales, with reasons of transparency and helping to guide growth cited.
- 5.2 However, comments also suggest that this support is conditional on refinements, clearer guidelines and safeguards.
- 5.3 Strong concerns are expressed that the 'large' category (51-300 units) covers a too wide range with suggestions that this will risk disproportionate impacts on communities. Concerns are also raised that cumulative impacts of multiple medium-scale developments could equate to a large-scale impact.
- 5.4 Multiple comments call for clarity about how limits apply, with a common question asking if the limits per settlement are over the plan period or per individual application. Comments suggest a concern that developers could submit multiple small applications.
- 5.5 Comments suggest introducing a 'very large category' or splitting the band into two. Comments request additional impact assessments for schemes over ~150 units.

- 5.6 Many comments highlight that numeric thresholds are not suitable due to the same number of homes affecting settlements differently. Comments suggest a percentage-based threshold (for example a 10% population increase) and that developments should be proportionate to the existing village size.
- 5.7 Some comments propose that the scales are too rigid, could artificially cap development, could force lower-density or fragmented development patterns and do not account for site-specific sustainability. Several comments suggest flexibility to exceed thresholds where justified.
- 5.8 Repeated comments raise concerns about infrastructure, particularly roads, A40 congestion, transport, schools, sewage, water and GP capacity. Comments suggest that development should only proceed after infrastructure is improved, rather than concurrently or after.
- 5.9 Some comments highlight concern about development in the CNL, with concern that large developments could undermine landscape character, with suggestions that even 10 homes could be significant and that policies should reflect special protections in designated landscapes.
- 5.10 Comments from respondents from specific villages suggest concern about too much development in some settlements, notably Stonesfield, Standlake and Brize Norton.
- 5.11 Some comments suggest that Milton-Under-Wychwood and Ducklington could support higher growth.

Question 5 - Do you support the revised spatial strategy outlined above? Would there be positive or negative implications for people and places arising from the spatial strategy?

Key matters arising from feedback:

- **Comments note concerns regarding infrastructure capacity (with roads, sewage, water, GP surgeries and schools of most concern)**
- **There is a perception that growth is unevenly or unfairly distributed across the district**
- **There is a strong emphasis on environmental protection, landscape sensitivity and the Cotswolds National Landscape**

- 6.1 Comments suggest mixed opinion about the proposed Spatial Strategy, with many comments supportive of the principles of the strategy.
- 6.2 Many comments indicate support for the settlement hierarchy concept, with some support for focussing larger growth in Tier 1 settlements and a focus on sustainable transport corridors.
- 6.3 Some respondents suggest that too much housing is focused along the A40 corridor, in Carterton/Brize Norton, and on the edges of Witney.

- 6.4 Multiple comments suggest strong concern regarding infrastructure with many respondents calling for an 'infrastructure first' approach with road congestion, particularly on the A40, sewage treatment capacity, flooding, GP and school capacity and scepticism about the Carterton-Witney-Oxford rail proposal of concern to respondents.
- 6.5 Comments also highlight the importance of protecting the Cotswold National Landscape, conservation areas, historic towns such as Burford and Charlbury and floodplains and biodiversity-rich greenfield sites.
- 6.6 Recommendations for the Cotswold National Landscape include strict proportionality limits (approximately 5% growth), with legal obligations to seek to further conservation in the CNL highlighted.
- 6.7 Comments suggest concerns regarding specific settlement areas, particularly those allocated as Tier 2 Service Centres such as Burford, Charlbury and Bampton. These concerns highlight infrastructure that is already under strain, traffic and heritage impacts and doubts regarding suitability for large-scale development.
- 6.8 There is acceptance of some growth in Bampton, however comments indicate a strong demand for phased delivery (max 50 homes every 5 years) and infrastructure alignment. Comments also highlight a disappointment regarding the removal of brownfield or smaller site options.
- 6.9 Comments regarding Carterton suggest Carterton's regeneration is not sufficiently addressed in the plan, with further concerns that Carterton lacks A-road access and strong employment. Additional comments note concerns about excessive growth around Brize Norton.
- 6.10 Concerns relating to Chipping Norton as a Tier 1 Main Service Centre focus on its ability to take strategic-scale development due to landscape constraints.
- 6.11 Many comments indicate concern about some villages placed in Tier 3 of the hierarchy, with comments suggesting unease regarding perceived excessive development, transport, coalescence with other settlements and insufficient growth limitations in protected landscapes.
- 6.12 Some comments are supportive of development in Tier 2 and Tier 3 settlements, suggesting that they could take more growth to reduce pressure on constrained areas.
- 6.13 Many comments call for more small and medium sites with more dispersed growth, enabling villages to remain viable and avoiding a reliance on large strategic sites, which are perceived as slow to deliver.
- 6.14 More flexibility in the scale of development in Tier 2 and 3 settlements is also called for as is a less restrictive approach.
- 6.15 Comments suggest a strong preference for a 'brownfield first' approach, with additional support for higher densities and more local, affordable housing sites, particularly in rural areas, with some specific site suggestions made.

- 6.16 Many comments suggest strong views that the A40 is unfit for supporting growth without major upgrades. There are mixed view regarding safeguarding land for a rail link, with some comments strongly supportive of the proposal while others question its deliverability.
- 6.17 Strong support for better bus services and safe cycle and walking routes is indicated.

Question 6 - Do you support the principle of West Oxfordshire meeting its identified housing and employment development needs in full? Are there environmental and infrastructure constraints, beyond those referred to in Section 6, that should influence the development requirements for the plan?

Key matters arising from feedback:

- **Infrastructure capacity is seen as critically insufficient for the proposed level of growth**
- **The Spatial Strategy and housing numbers are questioned—especially Oxford’s unmet need and over-concentration near Carterton/Brize Norton**
- **There is major concern about the deliverability and reliance on the Carterton–Witney–Oxford Rail Corridor**

- 7.1 Multiple comments express strong concern regarding the ability of existing infrastructure to support the proposed number of new homes in the district.
- 7.2 Key concerns that are noted include sewerage and water, which is seen to be underfunded and failing, with sewerage over-capacity with calls for no development until wastewater capacity is upgraded.
- 7.3 Additionally, comments cite A40 congestion as a crisis and concerns regarding GP surgeries and schools as being over capacity in many places.
- 7.4 Comments regarding the environment and flooding feature concerns about flood risk and fears of flooding downstream from large, new developments and the ecological damage from sewage discharges, which is perceived as being ‘underplayed’ in the plan.
- 7.5 There are strong calls to integrate the Local Nature Recovery Strategy more firmly into policy and a widespread desire to protect valued landscapes such as the CNL and agricultural land.
- 7.6 Many comments indicate strong concerns about the proposed Carterton-Witney-Oxford railway proposal. These concerns included costs, with no funding committed, the perception that a heavy reliance on the railway to justify development is high risk and the doubt that it will ever be built, which could leave unsustainable, car-based developments.
- 7.7 Other comments demonstrate support for safeguarding the railway route.
- 7.8 Some comments challenge the housing numbers and targets proposed, citing that they are too high or unrealistic. It is suggested that there should be a fixed cap and a phased

approach, to avoid speculative development, with development focussed on strategic sites, rather than villages.

- 7.9 Other comments question the methodology and underlying population data, along with the accuracy of the Water Cycle Study, whether the environmental evidence is up to date, the sustainability ranking of settlements and the expectation that West Oxfordshire should help meet Oxford City's unmet need.
- 7.10 Some comments are supportive of higher housing targets and consider that more may be required, particularly to meet affordable housing need and to make greater provision for Oxford's unmet housing need.
- 7.11 Linked to Oxford's unmet housing need, some comments acknowledge that, although the Duty to Cooperate is being abolished, cross-boundary collaboration is still required. It is noted by some comments that Oxford City's unmet need is unclear but likely to be substantial and that West Oxfordshire must contribute. Other comments disagree that West Oxfordshire should absorb Oxford's shortfall.
- 7.12 Calls for more small and medium sized sites to be allocated are also made by some comments, not just larger strategic sites.
- 7.13 There are also calls for more balanced, sustainable growth across the district, with suggestions including smaller developments across multiple settlements (dispersal) a greater focus on brownfield land, protecting the unique character of villages and respecting neighbourhood plans.
- 7.14 Comments suggest widespread concern regarding overconcentration around Brize Norton & Carterton, with the draft plan being perceived as adding 40–50% of the district's growth near Brize Norton, which comments consider deeply unfair and impractical. Comments highlight concern that Brize Norton lacks infrastructure and is already affected by RAF base traffic, Noise, sewage issues, flooding and poor road links.
- 7.15 Comments regarding employment land & economic development include the suggestion that Carterton needs better employment opportunities, not just housing, suggestions for science, Research and Development Parks, and improved retail/leisure and concerns that employment land provision is too low in the plan.
- 7.16 Multiple comments indicate community support for a new Carterton Community Sports Hub, with requests for a new hub centred on Carterton Football Club, including new pitches and facilities to support multiple local teams.
- 7.17 Some comments indicate dissatisfaction with public engagement associated with the Preferred Spatial Options Consultation. Comments include the perception that that they were poorly attended, use inaccessible formats and do not reach working families or younger populations. Suggestions for future events include events at schools, weekend sessions, more accessible, plain-language material, business community roundtables and outreach via clubs, churches etc.

Question 7 – Do you support the principle of updating and refreshing the existing allocation for Salt Cross Garden Village as part of the Local Plan 2043?

Key matters arising from feedback:

- **There are concerns about insufficient and uncertain infrastructure delivery**
- **There are scale of growth and overdevelopment concerns**
- **Doubts are expressed regarding delivery timescales, viability and realistic housing trajectories**

- 8.1 Support for updating the Salt Cross allocation is demonstrated in some comments, recognising Salt Cross as a key sustainable growth location. Comments also suggest some support for increasing densities if aligned with design principles and supported by infrastructure.
- 8.2 Supportive comments often highlight that transport improvements, environmental protection and the adoption of the Salt Cross AAP will be required.
- 8.3 Other comments suggest concern with the delivery timescale and viability of the site, remarking that the site has been allocated for nearly a decade with no delivery, the housing trajectory is over-optimistic, legal challenges and viability issues (including Grosvenor’s objections) have delayed progress and that the Council should have reserve sites or consider an early review.
- 8.4 Many comments indicate infrastructure as theme, with concern that infrastructure cannot support the proposed or increased housing numbers. These concerns relate to congestion on the A40, uncertainty about timing, funding and feasibility regarding the Carterton-Witney-Oxford Rail Corridor, parking and car dependency and a lack of sewage capacity, with a lack of upgraded sewage treatment works planned.
- 8.5 Some commenters suggest that no further development should proceed until major upgrades, such as A40 duelling, improved junctions or the rail corridor, are complete.
- 8.6 Other comments express concern that the combined growth of Salt Cross and West Eynsham will result in excessive pressure on the village, loss of Garden Village principles through higher densities, negative impacts on local character and landscape and insufficient green space. There are some calls for the growth to be shared with other communities.
- 8.7 The impact on community services is a significant concern raised in comments, with pressure on healthcare and schools in the area. Comments suggest that new provision should be fully funded and aligned with housing delivery, with careful phasing for schools and early years provision.
- 8.8 Environmental concerns are highlighted in some comments, with recommendations of buffers around ancient and priority woodland, the importance of nature recovery, ecological networks, and GI links, the avoidance of extra land being taken beyond the current allocation and the consideration of hydrological impacts on Oxford Meadows SAC.
- 8.9 A small number of comments propose reconsidering Barnard Gate as a preferred site, expanding Salt Cross to absorb housing from nearby parishes or extending garden village-style development to other rail-linked settlements (e.g., Tackley)

Question 8 – Should the allocation be updated, should it address the quantum of development and CWORC plus any other relevant changes in circumstance since 2018?

Key matters arising from feedback:

- **There are concerns regarding deliverability and uncertainty of the rail project (CWORC)**
- **More evidence is required to avoid a risk to soundness**

- 9.1 Comments of support suggest that the Carterton-Witney-Oxford Rail Corridor (CWORC) could support sustainable future transport needs and help reduce reliance on cars in addition to justifying higher densities.
- 9.2 Other comments suggest support if perceived issues are addressed. Such concerns include that the rail proposal may not be delivered within the plan period, that there are unclear technical feasibility, alignment, noise, topography and visual impacts, a risk of severance within Salt Cross or between Eynsham and the new development, a need for significantly more evidence before incorporating into policy and that any route must minimise impact on existing settlements such as Cassington.
- 9.3 Some comments also suggest that there is a risk that housing would be built but that the rail would never follow, it could disrupt or undermine the masterplan for Salt Cross and that severance impacts and land-take could damage place-making in addition to forcing densities beyond garden village principles.
- 9.4 There are calls from some commenters to rethink or abandon CWORC proposals, citing it could undermine the soundness of the plan if based on an unrealistic scheme, allocation may need to be re-planned entirely if CWORC is pursued and that there are risks of creating unviable development footprints.
- 9.5 It is suggested that an alternative to the CWORC would be alternative transport improvements (for example A40 upgrades or bus/cycle improvements) which are seen as more realistic and urgent.

Question 9 – Do you support the principle of updating and refreshing the existing allocation for the West Eynsham SDA as part of the Local Plan 2043?

Key matters arising from feedback:

- **There is uncertainty regarding transport capacity and A40 access**
- **Deliverability, infrastructure and scale of growth are raised as concerns**
- **There is concern regarding cumulative impact on Eynsham and local communities**

- 10.1 Many comments support updating and refreshing the allocation, noting that West Eynsham is already an established strategic site in the adopted Local Plan.
- 10.2 Several comments also strongly suggest that West Eynsham should play its part alongside Salt Cross, rather than development pressure falling entirely elsewhere.

- 10.3 Some comments express concern about the cumulative scale of growth when West Eynsham is combined with Salt Cross, with up to 3,750 new homes. These concerns include the perception that increased densities could undermine Garden Village principles, village character, and quality of life and there are calls for development to be shared more fairly across other communities.
- 10.4 Some comments note that, while supporting densification in principle, it should not be at the expense of placemaking, character, and integration, with calls for strong design codes, walkability, and high-quality public realm.
- 10.5 Other respondents suggest that densifying existing allocations should be prioritised over new sites.
- 10.6 Multiple comments question whether the increased housing numbers are realistic given that only ~24% of the original allocation has been delivered to date, planning applications have been withdrawn or stalled and there are perceived issues with fragmented landownership.
- 10.7 There are requests for stronger justification, evidence, and updated master planning before confirming the allocation, with several comments noting the absence of a clear delivery trajectory in the draft plan.
- 10.8 Many comments suggest that transport and the A40 are of concern, with comments noting existing congestion on the A40, particularly at peak times. Other comments highlight concerns that proposed mitigations, such as the park and ride, rail proposals and rapid bus transit, will not be sufficient, funded or delivered in time and uncertainty and delays due to changes to the A40 improvement scope, lack of confirmed access arrangements and no clear approval from the Highways Authority are also highlighted.
- 10.9 Concerns are also noted that continued uncertainty will delay delivery of housing within the plan period.
- 10.10 This has resulted in strong calls for certainty on A40 access, a single, integrated junction solution with Salt Cross and better consideration of bus routing reliability and stop locations.
- 10.11 Calls for other development to not outpace infrastructure are made, with healthcare, education, transport and active travel highlighted. Comments particularly note concerns about secondary school and early years provision.
- 10.12 Priority woodland and archaeological remains are cited in comments as requiring careful treatment and further investigation and concerns are noted that revised road layouts may negatively affect green and blue infrastructure corridors.

Question 10 – Should the allocation be updated, should it address the quantum of development and the updated A40 Access Options Assessment (June 2025) plus any other relevant changes in circumstance since 2018?

Key matters arising from feedback:

- **There are concerns surrounding the A40 capacity and access**
- **Environmental, heritage and utilities constraints are highlighted**
- **An ‘infrastructure first’ approach is called for**

- 11.1 Many comments indicate support for retaining the West Eynsham Strategic Development Area (SDA) in the emerging Local Plan, with further support for the delivery of more dwellings than originally stated, without extending the current boundary. There are calls for the existing allocation to be updated to reflect new evidence, particularly since adoption of the original policy.
- 11.2 Several comments suggest modest boundary extensions to align infrastructure such as the spine road fully within the allocation and to include nearby sites that are considered sustainable, well-located, and capable of early delivery without additional A40 impacts.
- 11.3 It is suggested by a few comments that West Eynsham is critical to meeting West Oxfordshire’s housing requirements and should work in conjunction with Salt Cross Garden Village.
- 11.4 Some respondents emphasise the acute housing shortage in Oxford and see Eynsham as a logical and sustainable solution.
- 11.5 A repeated concern, noted in comments, relates to traffic impacts on the A40. Many comments strongly advocate for significant upgrades to the A40, particularly between Witney and Wolvercote. Concerns are also raised about construction impacts, including road closures, diversions, and travel disruption.
- 11.6 Comments suggest support for acknowledging the updated A40 Access Options Assessment (June 2025), which identifies a signalised crossroads (Option D) as the preferred access solution. However, several comments believe that signalised junctions will worsen congestion, advocating instead for full dualling of the A40 with motorway-style slip roads.
- 11.7 Comments indicate strong concerns regarding the lack of a committed sewage/grey water disposal solution for the SDA, with respondents highlighting that Cassington Sewage Treatment Works is the nearest option but note there is no confirmed capacity upgrade in Thames Water’s AMP8 programme (2025–2030). This is perceived as a major risk, particularly with regard to protecting the River Thames and its Bathing Water Status at Wolvercote, and compliance with national planning policy.
- 11.8 Several comments raise concern that archaeological and heritage matters have not been adequately integrated into access planning, with respondents suggesting that insufficient early consideration could result in delays, increased costs, and risks to delivery, and recommendations are made for formal liaison with the Council’s archaeological adviser.

- 11.9 Biodiversity Net Gain (BNG) requirements have been noted by some comments, highlighting that the approved 2022 Masterplan did not account for the mandatory 10% BNG, which may require additional land take. Other respondents caution against increasing housing numbers without first assessing BNG implications.

Question 11 – Do you support the principle of updating and refreshing the existing allocation for the North Witney SDA as part of the Local Plan 2043?

Key matters arising from feedback:

- **Flood risk and environmental constraints are cited as concerns**
- **Deliverability and soundness of the allocation is questioned**
- **Infrastructure dependency, particularly around transport, is featured as a concern**

- 12.1 Comments suggest mixed views regarding the updating and refreshing of the North Witney Strategic Development Area (SDA).
- 12.2 Many comments suggest opposition to or strongly question the principle of updating and refreshing the North Witney Strategic Development Area (SDA), while a smaller number of comments support retaining and refreshing the allocation, often with updated policy wording or reduced housing numbers.
- 12.3 Some comments question the viability and deliverability of the SDA, citing high infrastructure costs (cited figures of £90m+), multiple landowners and lack of equalisation agreements, fragmentation of the developer consortium and slow progress since allocation in 2018.
- 12.4 Concern that keeping North Witney in the plan could undermine the five-year housing land supply and weaken the soundness of the Local Plan is noted in some comments, with suggestions to reduce capacity (from 1,400 to 1,250 or less) and reallocate the shortfall to more deliverable sites.
- 12.5 Other concerns highlighted by comments include loss of agricultural land and biodiversity, landscape impacts and sensitivity of floodplain areas.
- 12.6 Suggestions are made to develop less sensitive parcels only, split the development into smaller sites or consider alternative locations, including land south of the A40 or other sites near Witney with better transport links.
- 12.7 Multiple comments indicate a strong belief that the West End Link Road (WELR) is a non-negotiable requirement, essential for traffic mitigation, public transport reliability, and active travel and an adopted Local Plan commitment.
- 12.8 Comments indicate concern that developers are seeking to downgrade or remove infrastructure commitments, especially by relying on “active travel” instead and many

respondents highlight that without the WELR, the North Witney SDA is not viable and should be removed from the plan.

- 12.9 Perceived worsening congestion is highlighted by many comments, particularly around Bridge Street, West End, New Yatt Road and Hailey Road.
- 12.10 Comments suggest that traffic modelling is incomplete or unrealistic and note that New Yatt Road was excluded from modelling, despite being a main access route. Comments indicate the belief that active travel alone will not significantly reduce car use in a market-town context, with some comments suggesting an expected 2000+ additional cars, worsening bus reliability and increased delays for existing residents.
- 12.11 Flooding is cited by comments as a serious concern, with respondents highlighting that the site is already in a flood-sensitive catchment, Hailey Road and Bridge Street flood regularly, that the Environment Agency has objected to current proposals and that proposed mitigation has been described as inadequate or unproven.
- 12.12 Comments suggest that flood mitigation must protect both the site and downstream areas, be engineered for future climate impacts and be delivered before occupation, not later. Some comments highlight opportunities for strategic, district-wide flood defence but insist this must be secured through firm policy requirements.
- 12.13 Widespread agreement that essential infrastructure must be delivered before any housing is suggested by comments.
- 12.14 Comments indicate concerns about pressure on GP surgeries, schools (especially secondary education) and sewerage and water capacity, with several respondents suggesting that North Witney should be planned as a self-sustaining community and not a car-dependent extension of the town.
- 12.15 Some comments broadly support active travel in principle but indicate that it will be very difficult without the West End Link.
- 12.16 Other comments suggest that distances and routes are not realistic for many residents, with cycling routes involving steep hills and unsafe junctions and that promoting active travel is being used to justify the removal of roads.

Question 12 – Should the allocation be refreshed and updated, do you support a reduced quantum of development (1,250 homes)? Are there any other parts of the allocation that should be updated?

Key matters arising from feedback:

- **There are concerns regarding infrastructure deliverability – especially transport**
- **Questions about the appropriateness and scale of housing numbers are raised**
- **Environmental and servicing constraints are seen as concerns**

- 13.1 Many comments suggest support for a reduction of housing number with the perception that 1,250 homes is already the upper limit of what the site can realistically accommodate.
- 13.2 These comments indicate concerns regarding constraints, including flooding, sewage capacity, land availability and deliverability which it is perceived will result in far fewer achievable homes, in addition to concerns regarding the West End Link Road (WEL), which was seen as a fundamental prerequisite in the 2031 Local Plan.
- 13.3 Other comments indicate support for retaining or increasing housing numbers and emphasise the need to maintain overall housing delivery across the district, accepting 1,250 homes as a pragmatic figure that is perceived to reflect current planning applications.
- 13.4 Some comments suggest that if numbers are reduced at North Witney, alternative or adjoining sites should be allocated, for example land south of Hailey Road. Other suggestions are for sites to be freshly reassessed, rather than carrying forward partially undelivered strategic allocations.
- 13.5 There are also some calls for flexibility in policy, revised boundaries, and early-phase delivery to support the five-year housing supply.
- 13.6 Some comments voice concern that congestion will increase if housing proceeds without the WEL and that it is still necessary and should remain a requirement.
- 13.7 Other comments suggest that the WEL is no longer justified, conflicts with current transport policy, may increase traffic overall and should be removed from future policy.
- 13.8 Comments also suggest that the site risks undermining the Council's five-year housing land supply if infrastructure cannot be delivered in advance.
- 13.9 It is the belief of some commenters that the SDA allocation should be removed entirely from the Local Plan as the site is perceived to be financially unviable, fragmented in ownership, and dependent on unresolved infrastructure commitments and that Witney is already at or near saturation due to past developments.
- 13.10 Many comments regarding infrastructure raise serious concerns about infrastructure readiness, including sewerage capacity and illegal sewage discharges (with calls for Thames Water upgrades before development), flood risk and environmental impacts, including loss of green fields, trees, biodiversity, and landscape character. Strong calls for infrastructure being delivered before development are made.

13.11 Some comments suggest that prioritising “active travel” policies is not appropriate for a rural market town with an ageing population.

Question 13 – Do you support the principle of updating and refreshing the existing allocation for the East Chipping Norton SDA as part of the Local Plan 2043?

Key matters arising from feedback:

- **Questions regarding deliverability and realism of the CNI allocation are asked**
- **Infrastructure-led development and past delivery failures are highlighted**
- **There is disagreement regarding scale, location and sustainability of growth**

- 14.1 Many comments indicate that the majority support refreshing the allocation in principle, with conditions relating to infrastructure, heritage, sustainability and deliverability.
- 14.2 Comments indicate a widespread perception that the existing allocation cannot continue unchanged.
- 14.3 Supportive comments highlight that Chipping Norton is a Tier I Main Service Centre and one of few locations that is capable of strategic growth outside the National Landscape, with several commenters suggesting that if capacity is reduced, additional sites must be allocated elsewhere to compensate or risk a district-wide housing shortfall.
- 14.4 Several comments support a reduced capacity (c.750 homes) that reflects constraints.
- 14.5 Some comments support a refreshed approach provided that archaeological and ecological assets are protected, with a strong emphasis on respecting the Scheduled Monument, protecting nearby Glyme Valley SSSI and using buffers, green infrastructure, hydrology assessments and LNRS principles.
- 14.6 Less supportive comments suggest that the strategic-scale development is inappropriate and that growth should be below 300 dwellings with several respondents citing a lack of due diligence before allocating the site originally.
- 14.7 Some comments indicate that the current CNI allocation is undeliverable due to scheduling of significant Roman and Iron Age archaeology, failure to deliver the previously envisaged eastern link road and that only 173 of c.1,200 homes have been delivered since allocation.
- 14.8 Comments suggest repeated calls for a single comprehensive masterplan, plan-led growth, phased, realistic and cross-authority accountability (such WODC, OCC, NHS and developers).
- 14.9 One condition noted by many comments is that critical infrastructure should come first, before development, including healthcare expansion, primary school provision, walking and cycling routes which are LCWIP compliant, sports pitches and leisure facilities and public transport improvements. Comments recommend public transport improvements which include an increased S3 frequency, reinstatement of an X8 “Railbus” service and a better rail connectivity to Charlbury / Kingham.

- 14.10 Concerns are raised by comments that past developments failed to deliver promised infrastructure, particularly footpaths and crossings.
- 14.11 Comments concerning transport note strong opposition to car-dependent growth due to congestion on the A44, poor rail access and limited bus services on Banbury Road. There are calls for a travel hub with definition, Oxford express bus services and junction upgrades at the A44 double roundabout.
- 14.12 Some comments regarding sites North-of-London-Road express the belief that the distant from town centre is too great and too steep or inaccessible for less mobile residents.
- 14.13 Many comments suggest that land south of London Road is more sustainable due to proximity to services and buses.

Question 14 – Should the allocation be updated, should it be based on a reduced quantum of development with a northern focus primarily on the land between London Road and Banbury Road plus any other relevant changes in circumstance since 2018?

Key matters arising from feedback:

- **There are mixed views regarding the scale and location of housing development**
- **Concerns about infrastructure capacity and delivery are raised**
- **There are concerns regarding environmental, heritage and landscape impacts**

- 15.1 Comments indicate broad support for updating the allocation, which is thought to be both necessary and appropriate, to better reflect environmental, heritage and landscape constraints.
- 15.2 Responses show significant concern about the scale, location and infrastructure impacts of development in Chipping Norton.
- 15.3 Support in principle is demonstrated by comments, for a reduced quantum of development primarily to address heritage and landscape impacts. Several comments suggest that even 750 homes is too many, given recent and committed development, potentially increasing the town's population by up to 50%.
- 15.4 Many respondents agree development should shift north of London Road, where land is seen as less constrained.
- 15.5 Comments also suggest that green infrastructure, sustainable transport, drainage, biodiversity enhancement, and infrastructure delivery must be integral to any scheme.
- 15.6 Some comments dispute whether the evidence supports reducing capacity below 750 homes, suggesting land south of London Road still has potential.
- 15.7 Others suggest total capacity could be 800–850 homes, combining areas north and south of London Road.

- 15.8 A small number of comments suggest that housing in Chipping Norton should be maximised to reduce pressure elsewhere in the district, while others propose alternative strategies, including a new settlement elsewhere (e.g. near Enstone Airfield) or re-classifying Chipping Norton as a Service Centre rather than a Principal Town.
- 15.9 Comments indicate a strong perception that Chipping Norton lacks the capacity to absorb significant growth with concerns surrounding traffic congestion and road safety, air quality, insufficient sewerage and wastewater capacity, Healthcare capacity, Parking shortages and limited scope for major highway improvements due to the town's topography and setting.
- 15.10 Comments regarding environmental and ecological matters indicate strong concerns about development at this scale due to potential impacts on the Glyme Valley SSSI, Nature Reserve, CTA and LNRS. These comments suggest that the key risks identified include harm to farmland bird populations, rare flora, and limestone grassland; hydrological impacts on the River Glyme and increased recreational pressure, lighting and noise.
- 15.11 Mitigation suggested, if the development proceeds, includes a large on-site nature reserve (suggested minimum of 50 hectares), extensive green infrastructure and off-site habitat creation and long-term management funding

Question 15 – Do you support the principle of updating the existing allocation for REEMA North and Central as part of the Local Plan 2043?

Key matters arising from feedback:

- **There is support for brownfield regeneration and housing delivery**
- **There are concerns about delivery and infrastructure capacity**

- 16.1 Many comments indicate support for updating and refreshing this site, with respondents noting it as brownfield land and in a highly sustainable location in Carterton, helping reduce pressure on surrounding villages and greenfield sites.
- 16.2 Comments suggest that the site should be maximised for development, with high-density development (particularly 1–2 bedroom and affordable homes) widely supported.
- 16.3 There are strong calls for affordable housing, with support for housing linked to MOD operational needs. A request for a specific Local Plan policy for MOD establishments, addressing Agent of Change principle, noise, transport, and safeguarding issues, recognition of MOD land as brownfield and support for military housing on MOD land, is noted.
- 16.4 Other comments question whether homes intended exclusively for military use should count towards general housing need and whether further town-centre sites should also be allocated to reduce outward expansion.
- 16.5 Several respondents note that development should support the regeneration of Carterton, including links to town-centre renewal.

- 16.6 Comments indicate concern regarding sewage and wastewater capacity at Carterton STW, with investment perceived as being required, in addition to concerns regarding road capacity, parking pressure and construction traffic.
- 16.7 Comments also indicate strong concerns regarding development at Alvescot Downs, citing loss of open countryside, harm to historic character and conservation areas and a risk of coalescence with Carterton.
- 16.8 There are calls for stronger green infrastructure requirements, including increased tree cover and comments indicate concerns about environmental stress from higher densities.
- 16.9 Some comments highlight the perception that there is a long history of stalled or delayed delivery at REEMA sites, with concern that current or pending planning applications (including the December 2025 application for 265 homes) cannot yet be relied upon for housing delivery.

Question 16 – Should the allocation be refreshed and updated, should it continue to be based on an assumed quantum of 300 homes plus any other relevant changes in circumstance since 2018?

Key matters arising from feedback:

- **There is a consensus that the existing housing figure is outdated and should be increased,**
- **Scope for higher-density, well-designed schemes is requested**
- **There is a need for the delivery of affordable and smaller homes**

- 17.1 The majority of comments indicate support for reviewing or refreshing the proposed allocation for this site.
- 17.2 Comments also indicate a strong consensus that housing capacity should be increased, commonly to around 300–350 dwellings, based on updated evidence since earlier plans which is seen as justified and sound.
- 17.3 It is perceived by some comments that this increase would reduce pressure on other, less suitable sites. A fewer number of comments suggest increasing housing numbers further.
- 17.4 Other comments indicate that recent developments (e.g. Brize Meadow) should be factored in and allocations should be reassessed in light of real, current needs.
- 17.5 Comments indicate strong support for higher-density development on REEMA sites, particularly REEMA North and Central, with respondents highlighting a perception of significantly underutilised land within central Carterton, opportunities for infill development and the potential to improve townscape and site appearance.
- 17.6 There is also emphasis from some comments on linking sites to the Country Park to enhance accessibility.

- 17.7 Multiple comments highlight the urgent need for affordable housing, especially one- and two-bedroom homes, with support for high-density but well-designed schemes.
- 17.8 Several comments express concern that private developers may be reluctant to deliver these homes and as a result, many recommend delivery by the local authority and/or not-for-profit housing associations.
- 17.9 A small number of commenters perceive that the draft plan risks failing the tests of soundness and that housing delivery assumptions from existing large allocations are too over-optimistic. They also feel that policy restrictions on smaller settlements may be too rigid.
- 17.10 Some calls are made for modifications to core policies, particularly to allow appropriate development in smaller and medium-sized settlements where impacts can be mitigated. These comments support for a more dispersed approach, relying on small and medium sites to ensure steady housing delivery.

Question 17 Area A – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **There are concerns regarding environmental and landscape impacts**
- **Concerns regarding flood risk and infrastructure capacity are highlighted**
- **There are mixed views regarding scale of development and housing numbers**

- 18.1 Comments suggest mixed views regarding this site.
- 18.2 Supportive comments highlight that Area A is adjacent to Witney, the district’s largest settlement, close to employment areas, within reach of existing bus corridors and a compact, logical extension of the town.
- 18.3 These comments also place a strong emphasis on Area A being available, viable and deliverable, noting the current severe housing undersupply and failure to meet delivery targets.
- 18.4 Some comments state the belief that 600–800 dwellings is too low, with calls to increase capacity to around 1,200 dwellings. It is thought that this would be an efficient use of land (NPPF compliance) and at a scale needed to support a local centre, public transport improvements and a “mobility hub.”
- 18.5 Suggested mitigations indicate that impacts can be addressed through extensive green infrastructure (often cited as ~40–50% of site), tree belts and landscape buffers, sustainable drainage (SuDS), Biodiversity Net Gain (minimum 10%) and transport mitigation focused on active travel and bus enhancements rather than major new roads.
- 18.6 Comments which indicate objections to the site cite local and environmental factors.

- 18.7 Comments suggest that the site would cause serious harm to the Windrush Valley, described as an area of exceptional beauty and tranquillity and a key “green lung” for Witney.
- 18.8 There are also strong concerns about loss of open countryside and valley views, urban sprawl extending Witney northwards and a visual impact on the Cotswolds National Landscape (CNL), especially west of Dry Lane.
- 18.9 Recommends include reducing the scale, avoiding ridge lines, and possibly excluding land west of Dry Lane altogether.
- 18.10 Comments also suggest concerns regarding flood risk and drainage. There are repeated references to historic flooding in the Windrush Valley and Witney town centre (Bridge Street) and surface water run-off risks from development on valley slopes.
- 18.11 Concerns also highlight that Dry Lane already floods and the perception that development would worsen flood risk downstream.
- 18.12 There are calls for major flood attenuation and natural flood management and for developers to fund flood defence infrastructure.
- 18.13 Comments surrounding biodiversity and ecology indicate strong objections regarding the proximity to ancient woodland, veteran trees and multiple Local Wildlife Sites and the risk of habitat loss, fragmentation, lighting and recreational pressure with the Windrush Valley described as exceptionally rich in biodiversity.
- 18.14 Requests noted by comments include 50m buffers to ancient woodland, a large on-site nature reserve (up to ~40 hectares) and significant reduction in housing numbers (some suggest <350 homes if developed at all) and alignment with the LNRS.
- 18.15 Comments highlight nearby highly designated heritage assets, including the Minster Lovell ruins (Grade I / Scheduled Monument), St Kenelm’s Church (Grade I) and conservation areas and Chartist settlement. Comments also indicate concerns about impacts on the setting and character of Minster Lovell.
- 18.16 There are calls for Heritage Impact Assessments and archaeological evaluation and mitigation.
- 18.17 Comments indicate concerns regarding existing congestion (Burford Road, Dry Lane, Bridge Street) and limited road capacity and the risk of ‘rat-running.’
- 18.18 Comments also suggest that public transport is seen as insufficiently convenient or accessible without major upgrades and that there is a lack of walking, wheeling and cycling infrastructure.
- 18.19 Air quality is also an issue which is raised by comments.
- 18.20 One comment suggests that the eastern section of the site does not flood and could be used as land for allotments.

Question 18 Area B – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **Questions as to whether the site should be used for employment or residential use**
- **There are concerns regarding transport and infrastructure capacity**
- **There are concerns about the impact on landscape, settlement identity and the environment**

- 19.1 Comments suggest mixed views regarding whether the site would be more suitable for residential or employment use.
- 19.2 Comments that highlight support for employment use suggest that this is due to proximity to the A40, the amenity impacts for housing and the relative distance from Witney town centre.
- 19.3 Comments that highlight opposition to employment use is widespread among indicate key concerns regarding HGV traffic, industrial scale and lack of demonstrated need given that there is vacant employment land elsewhere.
- 19.4 Multiple comments question whether there is a genuine need for additional employment land in this location and there is a perception that existing vacant employment sites have been adequately considered.
- 19.5 Strong support for residential use of the site that is indicated by comments highlights that a live outline planning application for ~370 homes has been made and that there is evidence that housing impacts have been assessed and mitigated with a desire to direct employment land instead to Area D, which adjoins existing employment areas.
- 19.6 One comment suggest that the Sustainability Appraisal (SA) is inconsistent and flawed, stating that residential use performs well in assessments, employment use could generate greater landscape and visual harm due to scale and building height and that the site is not genuinely “isolated” and has good connectivity potential.
- 19.7 Comments have raised concerns regarding traffic, with recurring comments indicating concerns about the road network capacity (especially Brize Norton Road and Downs Road) and the HGV impact on villages, pedestrian safety, and congestion.
- 19.8 Broad agreement shown in comments suggests that significant transport mitigation is seen as essential, including developer funding for public transport enhancements, a bus turning loop within the site, contributions toward strategic A40 / mass transit solutions and improved walking, wheeling and cycling links to Witney and Carterton.
- 19.9 Some respondents propose a transport hub (bus/rail/park and ride) and safeguarding a potential Oxford–Carterton rail corridor.

- 19.10 Comments express strong concern that development would create continuous development between Witney and Minster Lovell and erode Minster Lovell's separate village identity.
- 19.11 There are therefore calls for a green wedge or undeveloped buffer and reducing the scale of Area B or restricting development to the eastern portion. Some comments also recommend reducing Area B in order for it to be kept further from the Cotswold National Landscape.
- 19.12 Comments acknowledge significant archaeological interest, including Iron Age / Roman features and later medieval and post-medieval remains. Comments suggest further desk-based assessment and field evaluation are required, with archaeological significance that could constrain development form and extent and suggestions that archaeology could be preserved or interpreted on site or in museums.
- 19.13 Comments highlight the presence of Grade 2/3 Best and Most Versatile (BMV) agricultural land, a need to retain ponds and embed green infrastructure and the importance of alignment with the Local Nature Recovery Strategy (LNRS).
- 19.14 Comments indicate concerns raised about a partial loss of Witney Lakes Golf Course and sports provision.
- 19.15 There is general support for biodiversity enhancements regardless of land use.

Question 19 Area C – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **Flood risk and environmental constraints are raised as concerns**
- **Incompatibility with existing infrastructure (STW and Abattoir) is suggested**
- **Some comments consider it to be an unsustainable location that would cause harm to the settlement pattern**

- 20.1 Many comments suggest significant opposition to the allocation of site C for housing.
- 20.2 Comments indicate that flooding is seen as a major constraint, with references to the land being low-lying, part of an active floodplain, especially around Colwell Brook, which it is highlighted as having a need to protect, including its habitats and nearby ancient woodland. There is also strong concern that development would displace floodwater, worsening flooding upstream (Witney) or downstream (Ducklington).
- 20.3 Concerns are raised by comments regarding Witney Strategic Sewage Treatment Works (STW) and a halal abattoir, which are repeatedly described as incompatible with housing amidst concerns including odour, noise, flies, lighting, health impacts (including respiratory issues) and a risk to future expansion of essential infrastructure.

- 20.4 Some comments suggest strong objection unless buffer zones and safeguards are included, citing conflict with safeguarded waste infrastructure. Comments also state that STW capacity upgrades would need to be substantial, not minor.
- 20.5 Other comments indicate strong concern that development would erode the countryside setting of Ducklington and lead to coalescence between Witney, Ducklington and Curbridge.
- 20.6 Past planning decisions and SHELAA findings have been cited, suggesting that the area is unsuitable due to unsustainable urban sprawl.
- 20.7 Additionally, the A40 is seen as a clear southern boundary of Witney, which it is perceived that this proposal would breach.
- 20.8 Concerns regarding accessibility are noted by comments. The site is described as severed by major roads (A40 and A415), with Witney town centre ~2km and access to Ducklington village amenities is considered unsafe or unattractive, particularly at busy roundabouts.
- 20.9 Many comments believe development here would be highly car dependent and that, while there is some bus provision and proximity to Lidl and services at the A415, most homes would be beyond easy walking distance.
- 20.10 Several respondents suggest Area C would be more appropriate for employment, industrial, science, or mixed-use development, while others indicate that housing numbers should instead be redistributed to more sustainable villages or focused on existing strategic sites higher in the settlement hierarchy.
- 20.11 Comments suggest that existing infrastructure is already at capacity and that further growth would be harmful.
- 20.12 The safeguarded Cowley–Witney–Oxford rail corridor (CWORC) runs through the site.
- 20.13 Some commenters perceive the Carterton-Witney-Oxford rail corridor (CWORC) as an opportunity for a new Witney station or mobility hub. Other comments see it as technically complex, highly costly and likely to reduce developable land and increase severance.
- 20.14 Multiple respondents question whether the rail proposal is realistic or deliverable at all.
- 20.15 Comments indicate mixed views in relation to capacity on the site, with suggested ranges from 600–800 dwellings up to 1,200–1,500 dwellings.
- 20.16 Comments supportive of the higher range indicate that only a very large scheme would justify a primary school and local centre and support public transport improvements.

Question 20 Area D – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **There are concerns regarding coalescence and loss of settlement identity**
- **Heritage, landscape and countryside impacts are highlighted**

- **Sustainability and infrastructure capacity is questioned**

- 21.1 Many comments indicate that Area D would erode or eliminate the strategic gap between Witney (Tier 1 town) and Minster Lovell (Tier 3 village). There are strong calls for a permanent, meaningful green gap to prevent settlements merging with an emphasis that Minster Lovell must remain a distinct, separate settlement, not subsumed into Witney.
- 21.2 Comments highlight that Area D lies very close to highly designated heritage assets, including Grade I Minster Lovell Hall ruins and St Kenelm's Church, Grade II* Dovecote and Minster Lovell Conservation Area (less than 100m away). The Chartist Estate in Minster Lovell is also highlighted as a non-designated heritage asset of national significance, with its historic linear plot layout and protected backlands.
- 21.3 There are calls for a Heritage Impact Assessment (HIA) before any allocation.
- 21.4 Many comments highlight that Area D is also within the setting of the Cotswolds National Landscape and near the Windrush Valley. Concerns include visual impact from elevated land, a loss of open countryside and harm to tranquillity and dark skies.
- 21.5 Recommendations from comments include reducing the western and northern extent of development, retaining the most northerly fields as undeveloped and strong landscape buffers and green infrastructure.
- 21.6 Repeated comments raise doubts about whether Area D is sustainable without major investment, with significant concern about lack of capacity at Witney Sewage Treatment Works and a risk of increased pollution and illegal discharges.
- 21.7 Comments regarding transport highlight concerns about an over-reliance on the 234-bus route, with concerns about its long-term viability, the distance from bus stops and the town centre reduces sustainability and a fear of increased congestion on Burford Road / Minster Lovell routes.
- 21.8 Concerns regarding pressure on GP services, schools, and other community infrastructure is also raised by comments, along with perception that residents may not feel part of Witney due to distance and poor connectivity.
- 21.9 Comments suggest more support for employment land than for large-scale housing, with several respondents suggesting that Area D should be employment-led, as it adjoins existing industrial estates and that residential development should be directed elsewhere (for example Area B or Ducklington).
- 21.10 Comments that indicate support for mixed-use proposals suggest that Area D performs well for employment access, air quality and economic objectives.
- 21.11 Strong buffers to Minster Lovell, careful design and reduced scale are emphasised.

- 21.12 Indicative capacities of 600–925 homes are widely viewed by comments as too large, with suggested alternatives including smaller-scale or reduced footprint development, relocation or redesign involving the golf course (though this is controversial) and a greater emphasis on green infrastructure, nature recovery, sports provision, and allotments.
- 21.13 Placemaking is highlighted as critical due to the distance from Witney town centre with a risk of creating an isolated or disconnected community.

Question 21 Area E – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **There are concerns regarding infrastructure capacity and deliverability**
- **Questions regarding whether Area E is suitable for strategic-scale growth at all, and if so, at what scale are raised**
- **Environmental, landscape, and community impact concerns are highlighted**

- 22.1 Comments indicating support for the site suggest that it is deliverable in the short term (potentially within first 5 years), could contribute significantly to housing supply and can function as either an extension of Carterton or a new self-contained settlement if large enough.
- 22.2 These comments suggest 1,200–2,000+ dwellings are appropriate for the site, with some suggesting 1,500 homes are easily achievable, citing that larger scale (1,400+) is essential to support schools, shops, and viable public transport.
- 22.3 Other comments suggest that Area E conflicts with the Local Plan’s spatial strategy and Brize Norton’s Tier 3 village status, risks coalescence between Carterton, Brize Norton, and Shilton and would fundamentally change the character of the area.
- 22.4 Some comment suggest an indicative capacity of 700–800 dwellings, with other suggesting a smaller scale (100–150 homes) may be acceptable.
- 22.5 Comments place a strong emphasis on sports provision, particularly reprovision or protection of Carterton FC pitches and note a chronic shortfall in grass and 3G pitches across Carterton and West Oxfordshire.
- 22.6 Several comments indicate that a new sports hub and pitches must be delivered before any loss of existing facilities and that development should help solve, not worsen, the sports deficit.
- 22.7 Infrastructure capacity is widely cited as a critical issue by comments, with Carterton STW already at or near capacity, concerns about illegal sewage discharges during wet weather and strong calls for infrastructure to be delivered before occupation of homes.
- 22.8 Comments regarding transport indicate poor existing bus provision, long distances to existing services (often over 1km), fear of increased congestion on A40, Upavon Way, and local roads.
- 22.9 Comments indicating support suggest that this is conditional on a new bus route or future rail link.
- 22.10 Healthcare, education and services are indicated as overstretched with concerns that development would not be matched by new facilities.

- 22.11 Many comments indicate concern about a perceived impact on Kilkenny Lane Country Park, with the park valued for biodiversity, dark skies, tranquillity and a sense of separation from urban areas.
- 22.12 Comments suggest strong concerns about lighting, commuter cycle routes and increased footfall and “cut-through” use, with requests to pull development back from the park edge and retain or extend green buffers.
- 22.13 Comments note that the area lies within the setting of the Cotswolds National Landscape and issues which are raised include visual impact and topography (110m contour debated), light pollution affecting dark skies, archaeological interest (Iron Age and Roman remains) and priority woodland and LNRS ecological corridors.
- 22.14 There is general agreement that further assessments (HIA, archaeology, landscape, noise) are essential.
- 22.15 Comments note RAF Brize Norton considerations including aircraft noise and safeguarding, the importance of not constraining RAF operations and strategic road access for military transport.
- 22.16 Some comment note that the RAF is not expected to expand employment, weakening arguments for housing growth linked to the base.
- 22.17 One comment objects to the proposed site due to the area lying within a Mineral Safeguarding Area for crushed rock and the risk of sterilising a strategic mineral resource. Calls for a Mineral Resource Assessment before allocation are made.
- 22.18 Some comments express that Questions 20–24 cannot be meaningfully answered without a full spatial strategy.
- 22.19 Comments also note confusion over the relationship between strategic sites and settlement hierarchy and differences between council housing figures and developer proposals.

Question 22 Area F – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **Major infrastructure deficiencies (transport, sewage/water and services) are highlighted**
- **There are concerns about disproportionate growth and settlement identity**
- **Environmental and land-use constraints (landscape, minerals, biodiversity and heritage) concerns are raised**

- 23.1 Many comments suggest that the site could function as a new standalone settlement or “garden village”, rather than an extension of Carterton, with some comments suggesting it could house 3000+ dwellings.

- 23.2 Some comments indicate that Area F is deliverable (single ownership, single developer) and can provide new homes, employment land, schools, health facilities, sports, and open space and a new link road improving access to Carterton and RAF Brize Norton.
- 23.3 These comments also suggest that the site performs better than other Carterton options against national policy on sustainable growth and offers a rare opportunity to deliver high-quality public transport, fund strategic infrastructure and create a planned, comprehensive community rather than piecemeal growth.
- 23.4 Strong concern from comments suggests that the scale would overwhelm Brize Norton, alter its village character and lead to coalescence with Carterton and Minster Lovell. Comments also suggest that Carterton has reached its physical limits and that all options are inherently disjointed, making Area F no worse than alternatives.
- 23.5 Concerns are voiced regarding infrastructure, with repeated claims that the existing sewerage and wastewater system is already failing.
- 23.6 Other infrastructure concerns that are voiced include pressure on GPs, with surgeries already at capacity, primary and secondary schools being oversubscribed and water supply capacity and pressure issues. There are calls for infrastructure to be in place before occupation.
- 23.7 Comments regarding transport highlight congestion on the A40 as a major concern and estimates suggesting that development could add 20,000+ vehicle movements per day.
- 23.8 Concerns are also raised regarding 'rat-running' through Brize Norton village and capacity and safety at Burford Road and Station Road.
- 23.9 Some comments suggest scepticism that a future railway (CWORC) would solve short- to medium-term traffic problems.
- 23.10 Limited access points into the site are noted by some comments.
- 23.11 Comments which highlight support for the site indicate that Area F sits on an existing strategic bus corridor and that it offers the best opportunity for bus priority, mass transit, and a new A40–Monahan Way link road. It is suggested by comments that development could help justify CWORC and other rapid transit investment.
- 23.12 Comments which concern environmental and landscape impacts suggest strong objections to loss of farmland and agricultural land, biodiversity impacts, including farmland birds, hares, deer, owls, lapwings, and woodland habitats and proximity to the Cotswolds National Landscape (CNL).
- 23.13 Other concerns highlighted by comments include light pollution and dark skies, potentially extending deeper into the CNL, insufficient buffer zones (many call for 200m green buffers) and flood risk and downstream impacts, including on RAF Brize Norton.
- 23.14 Supportive comments suggest that impacts can be mitigated through careful master planning, setbacks from the A40 and CNL, Biodiversity Net Gain (10%+) and green infrastructure and woodland planting.

- 23.15 Comments regarding heritage and historic assets suggest significant concern about impacts on Minster Lovell's Chartist Estate, identified as a non-designated heritage asset of national importance and ancient rights of way, drove roads, and Roman routes (for example Ting Tang Lane).
- 23.16 Comments also suggest concerns that development would permanently erode historic settlement patterns and rural identity.
- 23.17 One comment expresses a strong objection due to the site's location within a Mineral Safeguarding Area for crushed rock, a risk of sterilising mineral resources and the proximity to active quarrying, recycling, and waste operations. The comment further states that Area F currently conflicts with adopted Minerals & Waste policies unless further evidence (e.g. Mineral Resource Assessment) is provided.
- 23.18 Comments regarding aircraft noise and safeguarding constraints, the protection of operational capacity and flight paths, the need to ensure flood risk does not affect the airfield and the importance of maintaining strategic road access for military vehicles are also voiced.

Question 23 Area G – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **There are infrastructure and environmental constraint concerns**
- **There is a questionable need for additional employment land in this location**
- **Concerns about cumulative impact on Brize Norton and the settlement character are raised**

- 24.1 Support is indicated by some comments for the allocation of this site for employment land as it is seen to offers jobs near proposed new housing, could align with RAF Brize Norton-related innovation and could be part of a bigger cluster of growth to the east of Carterton. Calls for it to be more broadly defined (for example care, education, food growing, co-working) are made by some comments.
- 24.2 A small number of comments express support for the allocation without conditions.
- 24.3 One comment strongly supports the allocation, with the suggestion of a 10.8 ha of employment land integrated with a new village of up to 3,000 homes (Area H) in addition to the delivery of a relief road bypassing Brize Norton, a country park and extensive GI, a cycling/walking network, mobility hub, A40 upgrades and land safeguarded for a future railway.
- 24.4 This comment also suggests that there are no major ecological or heritage constraints and that landscape effects can be reduced through a revised masterplan.
- 24.5 Suggestions for the site include an indoor sports facility, hotel, pub and a technical college.

- 24.6 Some comments suggest employment should instead be incorporated within Area F.
- 24.7 Many comments indicate the belief that additional employment land here is unnecessary due to existing employment sites in Carterton and Witney remaining vacant, employment land at Brize Meadow and Monahan Way has failed to attract occupiers and the growth in home-working reduces demand.
- 24.8 Comments that highlight landscape and environmental aspects suggest concern about the visual impact on Brize Norton village, the loss of farmland, and the harm to local wildlife, including hares, deer, barn owls, lapwings, and other farmland birds.
- 24.9 Comments highlight the need for a landscape-led approach with woodland and buffers, concerns over habitat loss, especially given cumulative development nearby, requests for 200m green buffers, structural planting, and strong GI networks and it is noted that some land lies within an area mapped for river and riparian habitat restoration.
- 24.10 Some comments highlight the need for a proportionate Heritage Impact Assessment, with potential effects on nearby listed assets, especially Astrop Farmhouse noted.
- 24.11 Comments also note the archaeological potential including cropmarks, ring ditch, enclosures, and possible Anglo-Saxon cemetery and highlight that a geophysical survey is required.
- 24.12 Many comments suggest that transport is of concern, with significant existing congestion on the A40, Station Road, Brize Norton Road and surrounding routes and concerns regarding increased HGV traffic and safety issues on narrow village roads.
- 24.13 One comment highlights a lack of clear walking, cycling, and public transport connections to surrounding settlements and other comments suggest that sloping topography makes the site unsuitable for large-scale employment uses.
- 24.14 Insufficient wastewater treatment capacity (for example, reliance on Brize Norton SPS), the historic failure by Thames Water to deliver improvements, the need for better-than-greenfield runoff rates to avoid downstream flooding, especially affecting RAF Brize Norton and concerns over freshwater supply pressure are voiced by some comments.
- 24.15 One comment notes that development must not constrain operational activity associated with RAF Brize Norton and must ensure that aircraft noise is accounted for, that it protects transport access for heavy equipment, it ensures no increase in flood risk to the airfield.
- 24.16 Comments regarding strategic / spatial concerns suggest an unequal distribution of development, with it noted that Brize Norton is already hosting over 46% of proposed district growth and that current/future growth risks overwhelming a designated small village, undermining its identity.
- 24.17 Some comments suggest concern about cumulative impact with Areas E, F, H, I and highlight potential conflicts with neighbourhood plan policies.
- 24.18 Some comments suggest that the proposal would be more appropriate as part of Area F or H, is poorly aligned with a credible public transport corridor and would contribute to car-dependent sprawl.

Question 24 Area H – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **Major infrastructure constraint (highways, transport and utilities) concerns are raised**
- **The suitability of the location – environmental, landscape & RAF constraints – is questioned**
- **Stakeholders highlighted conflict with spatial strategy and a disproportionate impact on Brize Norton**

- 25.1 Many comments indicate strong concern regarding the allocation of this site.
- 25.2 Comments regarding the environment and landscape highlight concerns about the loss of agricultural land and harm to landscape setting, biodiversity loss, especially farmland birds and flora, proximity to ancient woodland (Round Copse, Ten Acre Copse, Huck’s Copse) and the need for buffers and flood risk and concerns about impacts on the Shill Brook with the area seen as a major incursion into open countryside.
- 25.3 Comments also highlight infrastructure constraint concerns including that sewage and wastewater capacity are already insufficient, freshwater supply pressures, congestion on the A40, highways costs and bypass infrastructure considered “inordinate” and the perceived questionable viability of sustainable transport or mass transit serving this isolated location.
- 25.4 Comments regarding transport and connectivity note concerns regarding the site distance from existing bus corridors which are seen as unlikely to generate demand for frequent services, concerns that it will become a car-dependent satellite settlement, the thought that cycling/walking routes are currently inadequate and the anticipated need for mass rapid transit before occupation.
- 25.5 Comments which reference RAF Brize Norton highlight concerns that large areas of the site lie directly under or near main flightpaths with noise and military operational constraints noted and the unsuitability of housing close to the airbase emphasised.
- 25.6 Some comments indicate the perception that the settlement hierarchy and spatial strategy is inconsistent with Brize Norton’s role as a Category 3 village (small-scale development only) and the plan’s strategy focusing on growth in Carterton, yet most sites are around Brize Norton.
- 25.7 Comments perceive an over-concentration of growth with Brize Norton taking 40–50% of the district’s housing needs which would ‘swallow up’ Brize Norton and alter its rural character. Calls for more even distribution are made.
- 25.8 A need for a proportionate Heritage Impact Assessment due to nearby scheduled burial mound and listed assets is highlighted by comments.
- 25.9 Comments which indicate support for the allocation suggest potential benefits of the site including the ability to deliver substantial housing needed in the district, that, if master planned well, could create a vibrant new community and opportunities for new

infrastructure, including a relief road, schools, healthcare facilities, a country park and walking and cycling routes.

- 25.10 Other strategic location benefits suggested by comments include a good relationship to proposed employment at Area G, could allow improved access to A40 and support future rail/MRT options and offers potential east–west links without impacting Brize Norton village.

Question 25 Area I – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **Environmental and landscape constraints (including flooding and biodiversity) are raised**
- **It is thought to be an unsustainable location with transport/connectivity failures**
- **Infrastructure capacity and settlement impact are considered to be of concern**

26.1 Many comments suggest strong opposition to this allocation.

26.2 Comments regarding environmental, landscape and heritage highlight concerns that this is a sensitive landscape forming Carterton’s long-standing soft western edge, including the Shill Brook Valley – a Conservation Target Area (CTA) and part of the Local Nature Recovery Strategy, rolling, open countryside with high landscape value, important views, tranquillity, and rural character and priority habitats, ancient woodland links, and multiple red-listed farmland bird species.

26.3 Several comments note that the area previously formed an Area of High Landscape Value and was rejected in earlier local plan examinations for the same reasons.

26.4 One comment states development here would cause “devastating” ecological impacts, including habitat fragmentation, recreational pressure, hydrological impacts, and loss of wildlife corridors.

26.5 Other comments include concerns about flooding, drainage and sewage infrastructure failures across many parishes including that land is regularly flooded and waterlogged in winter, sewage infrastructure already overflows illegally into the Shill Brook, SUDS are unlikely to function due to poor ground permeability and a risk of increased downstream flooding, including in Alvescot, Langford, Clanfield, Broadwell and others. Reference to flooding in 2007 and 2023 was made by many comments.

26.6 Respondents suggest that the site is poorly connected and fundamentally unsustainable and is physically separated from Carterton by the Shill Brook corridor, would operate as a stand-alone estate, not a well-integrated neighbourhood, access routes (B4477, Shilton Lane) are narrow, dangerous, and already at capacity, there is an increased risk of rat-running through Alvescot, Filkins, Kencot, Langford, and others, bus travel times to Oxford already exceed 90 minutes and no credible improvement planned, walking/cycling links are currently poor and require new bridging of Shill Brook and the site is not near A40 or strategic roads.

- 26.7 Several comments also note that it is poorly located for commuting, locking in car dependency.
- 26.8 Pressure on services and utilities is also noted by comments, with concerns regarding healthcare capacity, primary and secondary schools, sewage treatment and water supply, electricity, broadband, drainage capacity and emergency services.
- 26.9 Comments suggest concerns regarding a loss of agricultural land and rural identity with a perception that productive grade 2/3 agricultural land would be lost, a threat of coalescence between Carterton, Alvescot, Filkins, Kencot, harm to the Cotswolds visitor economy and rural character and concerns that this creates a precedent of urban sprawl.
- 26.10 Comments regarding the Carterton–Witney–Oxford rail line note that it has no committed funding, is unlikely within the plan period, is not justified to extend to Alvescot Down and could cause substantial landscape impacts.
- 26.11 One comment requires safeguarding for flight paths, bird-strike concerns from SUDS/ponds and control of floodwater impacts downstream in relation to RAF Brize Norton.
- 26.12 There are concerns about the site being described as “scalable”, which some commenters interpret as a threat of long-term westward expansion, which is strongly opposed.
- 26.13 One comment supports the allocation, considering the site to be deliverable at an early stage with one landowner, provides opportunities to “balance” Carterton’s growth westward, can deliver 1,000 homes, primary school land, local centre and green infrastructure, can enhance the Skill Brook corridor and landscape structure and suggests good walking/cycling access to Carterton and potential improvements to bus services.
- 26.14 This commenter also states that technical work shows drainage, ecology, heritage, and landscape impacts are manageable and supports the railway concept, but that development should not be dependent on it.
- 26.15 A few comments express that there are some potential advantages to the site (for example, the proximity to a secondary school and its compact form although these comments also highlight major concerns about sustainable travel and bus viability).
- 26.16 Some comments support growth around Carterton in principle, but not this site.

Question 26 Area J – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **Suitability and sustainability of the location is questioned**
- **Environmental, landscape and biodiversity impact concerns are highlighted**
- **There is concern surrounding infrastructure capacity and delivery**

- 27.1 Supportive comments for this site suggest that the area is suitable, highlighting good access to supermarkets, health facilities, and bus services and suitability for commuters due to links to Oxford, Banbury, Milton Keynes, Birmingham.
- 27.2 Some comments also suggest preference for this area over previously proposed sites near Charlbury Road and a view that Chipping Norton needs to take more housing growth, with it perceived that the north of the district needs to accommodate a fairer share of development.
- 27.3 Comments suggest that support is strongest where development is seen as less intrusive than other options and capable of delivering needed homes and growth.
- 27.4 Other comments suggest strong opposition to the allocation, stating that the site is too far from the town centre (up to 2km) to encourage walking/cycling, is car-dependent, worsening traffic, parking, and air pollution, is poorly coordinated with Oxfordshire County Council's land south of London Road (Tank Farm), which it is thought is a more sustainable and central location and is vulnerable to over-development, as other development may still bring forward additional land south of London Road, leading to >750 homes overall.
- 27.5 Comments suggest major landscape, environmental and biodiversity concerns including impacts on Glyme Valley SSSI, BBOWT nature reserve, Local Wildlife Sites, and Conservation Target Areas, recreational pressure on sensitive habitats, hydrological impacts on the Glyme watercourse, impacts on dark skies, tranquillity, and the rural landscape and the development increasing Chipping Norton's footprint by 23–24%, far exceeding what is considered proportionate (10%).
- 27.6 Recommendations made by commenters to reduce the impacts of these concerns include the consideration of reducing the allocation from 750 to <400 homes, requiring large-scale green infrastructure, including a minimum 15 ha nature reserve and the avoidance of development near the most ecologically sensitive fields.
- 27.7 Further suggestions include the strengthening of buffers, tree planting and SuDS features. It is also highlighted that traditional orchard and archaeological issues need careful treatment.
- 27.8 The presence of a scheduled monument south of London Road is seen by comments to create a major constraint and it is expressed that additional archaeological evaluation is needed north of London Road.
- 27.9 Some comments welcome that the new proposal is perceived as avoiding harm to the monument, unlike the former strategic allocation.
- 27.10 Infrastructure needs are highlighted by comments. There are calls for a new or expanded primary school and for land to be safeguarded for health centre expansion.
- 27.11 Comments also express concern that the cricket club lies within the draft allocation and is at risk, in addition to Chipping Norton lacking public football pitches. Suggestions include a new sports hub, including 3G pitches and changing facilities and working with the Field Reeves Trust to secure land.

- 27.12 Sewage capacity is also highlighted as a concern by comments, with widespread agreement from comments that Chipping Norton sewage treatment works must be upgraded before any development.
- 27.13 Comments regarding transport suggest that the previously planned eastern link road may not be delivered, raising concerns about traffic impacts, that bus services would require reconfiguration and that the double roundabout at A44/Banbury Road is already poor for active travel.
- 27.14 One comment suggests a concern regarding the proposed use of Russell Way as an access route, highlighting that it is a closed-end road and the only vehicular access to both Chipping Norton Health Centre/Community Hospital with concerns relating to how safe it would be with the number of users.
- 27.15 Some comments suggest that additional alternative sites around Chipping Norton should be assessed, with the perception that previous strategic allocations failed partly due to infrastructure issues. It is also suggested that smaller sites (for example, Land West of Burford Road) should also be allocated to ensure delivery across the plan period.
- 27.16 A significant number of commenters advocate reconsidering Tank Farm (south of London Road) as a site, which is closer to the town centre (approximately 500m), has better walking access via Rockhill, Rowell Way, Wards Road and Fox Close and is more integrated with existing community facilities.

Question 27 Area K – Is this a suitable location for strategic-scale development? What are the reasons for or against strategic-scale development in this location?

Key matters arising from feedback:

- **It is considered that severe infrastructure constraints (physical, social and utilities) exist**
- **There are significant environmental and biodiversity impacts**
- **Suitability of Long Hanborough for further large-scale growth is questioned**

- 28.1 The majority of comments express the belief that Long Hanborough is incorrectly classified as Tier 2, strongly suggesting that it functions as a large village (Tier 3) and lacks the amenities of a service centre.
- 28.2 Many comments further state that existing growth has been far above proportionate levels, with ~35–56% growth since 2011 (four times district average) and that with North Field and Area K, the total increase would exceed 32% above 2021 levels. It is perceived that proportional growth should be around 10%, not 30–50%.
- 28.3 Comments strongly suggest that infrastructure capacity is ‘already beyond breaking point’, with concerns regarding the GP surgery and pharmacy being at capacity, with long waits and severe parking pressure and no physical space for expansion, the primary school and

Bartholomew Secondary School are full and early-years childcare is described as critically oversubscribed.

- 28.4 Water and sewerage are also noted by comments as a major concern, with insufficient capacity and frequent flooding of the pumping station near the site cited, along with reports of sewage spills, odours and contamination of local rivers (the Evenlode and Windrush Rivers). Comments also note that Thames Water has no deliverable upgrades before 2030–2035.
- 28.5 Concerns from comments indicate perceived transport Issues, with the A4095 and Lower Road described as dangerous, narrow and over capacity. Comments also suggest that Lower Road junction with A4095 is a known accident hotspot.
- 28.6 Comments suggest that both railway bridges (Lower Road and A4095) present severe safety and capacity constraints and that there is a significant risk of increased congestion, pollution and accidents.
- 28.7 The sustainability of the railway station is questioned, with comments indicating that the car park is full by 7.20–8.00am and that 81% of station users arrive by car. Comments further suggest that trains are often overcrowded, delayed or cancelled and that bus services are infrequent and poorly aligned to train times, especially from villages like Freeland.
- 28.8 Comments suggest that the A4095 cycle/pedestrian path is too narrow, with poor visibility and near-misses, which is perceived to affect active travel.
- 28.9 Environmental & biodiversity issues, which are repeatedly cited by comments, include concerns about Pinsley Wood ancient woodland, with the perception that development will affect wildlife corridors, bat foraging areas, badger setts (largest known in Oxfordshire) and bluebell carpets and understorey habitats. NPPF 183 (protection of irreplaceable habitats) is repeatedly cited in comments.
- 28.10 Comments state that Site K sits in a major corridor connecting Cogges Hill → Freeland → Church Hanborough → Pinsley Wood → Evenlode Valley → Burleigh Wood, with confirmation of at least 11 species of bats (including Barbastelle & Greater Horseshoe), roe deer routes and multiple active badger setts.
- 28.11 Flooding is also cited as a concern, with comments stating that fields in Area K regularly flood and that Lower Road and the A4095 frequently become impassable. Further concerns indicate a risk that further hard surfacing would worsen downstream flooding.
- 28.12 Some comments suggest that development would urbanise open countryside forming the rural setting of Long Hanborough, Pinsley Wood and The Evenlode Valley and cause harm to the historic landscape character, public rights of way views and a potential visual relationship with Blenheim Palace World Heritage Site.
- 28.13 Comments cite that Site K sits on the far eastern edge of an already elongated village and concerns suggest that it will create a “bolt-on” estate, detached from the community, with suggestions that residents at Hanborough Park already report feeling isolated from the main village.

- 28.14 One comment that expresses support for the allocation of Area K consider that the site should deliver 650 homes, citing proximity to the railway station and the Government’s proposed “default yes” for housing near stations, with infrastructure upgrades and large green-infrastructure buffers proposed.
- 28.15 Support for development is also suggested in order to improve viability of bus routes, enable a new link road to serve Salt Cross and to create cycling connections to the station. These comments acknowledge heritage constraints, the sensitivity of Pinsley Wood and a need for careful design and buffers.
- 28.16 Other objections noted by comments include that the site would sterilise a safeguarded mineral deposit, that it is unsustainable and harmful, warns of impacts on ancient woodland and the LNRS corridor, requires a 50m buffer as a minimum and is too damaging to the site’s ecology. It is also noted that a full HIA, due to risks to Blenheim Palace’s setting, would be required.
- 28.17 Comments further suggest concerns regarding dark skies and tranquillity.
- 28.18 Many calls are made for the removal of Site K from the Local Plan, reclassification of Long Hanborough to Tier 3 and growth capped at no more than 10%, tied to deliverable infrastructure.

Question 28 - Do you support the principle of updating and refreshing the existing allocation for Woodford Way car park, Witney, as part of the Local Plan 2043?

Key matters arising from feedback:

- **There is strong opposition to loss of parking capacity**
- **Conditional support would be considered only if parking is retained or re-provided**
- **Wider strategic concerns - transport, growth and infrastructure planning - are raised**

- 29.1 The majority of comments suggest an objection to, or express serious concerns about, the development of Woodford Way car park for housing.
- 29.2 Many comments suggest that the car park is heavily used and often full and that its removal would worsen parking pressures for shoppers, town centre workers, visitors and patients at local surgeries and the community hospital. It is also expressed that reduced parking could harm the town centre economy by lowering footfall.
- 29.3 Comments also indicate that Witney already struggles with parking availability, cycling uptake and public transport and that new housing developments in North and East Witney (and others proposed to 2043) will significantly increase parking demand.
- 29.4 It is also suggested that there is no clear parking strategy for Witney, making the allocation premature and that without a replacement car park of equal or greater capacity, development should not proceed.

- 29.5 Some comments express concern that reducing parking would increase illegal parking and congestion.
- 29.6 Several comments suggest alternatives, indicating that they may support development if a multi-storey car park is built on-site to retain or increase existing capacity.
- 29.7 Additional suggestions for alternatives include housing built above retained parking and building higher-density housing due to the central urban character.
- 29.8 Improved bus routes, including a potential express service via the new A40 slip road, are also suggested.
- 29.9 An assessment of traffic and placemaking impacts, archaeological assessment and clarity on housing numbers are also called for.
- 29.10 A smaller number of comments express support for the allocation due to it being a sustainable location, the policy aims to prioritise sustainable transport and it meets local housing need.

Question 29 – Should the allocation be refreshed and updated, do you agree that this should better reflect anticipated site capacity (75 homes) plus any other relevant changes in circumstance since 2018?

Key matters arising from feedback:

- **There are strong concerns about the loss of car parking**
- **There is a need to consider heritage and environmental impacts**

- 30.1 Many comments suggest that parking in Witney is already under pressure and should not be reduced. High demand, future population growth, and the needs of people travelling from rural areas with limited public transport are highlighted.
- 30.2 Comments also note that the car park serves important local facilities (for example for the doctors' surgery and the hospital).
- 30.3 Several comments call for retaining the existing car park, providing a multi-storey option, or ensuring a net increase in parking if development happens. One comment suggests that free/affordable parking for core users should be retained.
- 30.4 Comments suggest that an evidence-based approach is necessary before making capacity changes. It is also recommended that any review must consider impacts on the conservation area and Unterhaching Park.
- 30.5 Some comments suggest support for updating the capacity to 75 homes.

Question 30 Area L – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **Infrastructure capacity and settlement sustainability are questioned**
- **There is disagreement over the scale, location, and direction of growth**
- **Statutory constraints are highlighted - minerals, archaeology and transport**

- 31.1 Many comments indicate concerns regarding infrastructure, highlighting the perception that GP surgeries, school places, and local shop provision are currently inadequate.
- 31.2 Comments also indicate that roads around Bampton are prone to flooding, sewage infrastructure needs upgrading (with upgrades not due until 2028) and that bus services are limited, particularly in the evenings and on Sundays, which is seen to increase car dependency.
- 31.3 Concerns about overdevelopment and cumulative expansion since 2017 have been highlighted, with a desire to avoid coalescence with Aston. Other commenters feel the village is already overcrowded with limited parking.
- 31.4 A lack of active travel connectivity is highlighted, with a need for walking and cycling improvements.
- 31.5 Some comments raise minerals safeguarding constraints for the site with further evidence required and archaeological sensitivities are noted, with Roman finds nearby.
- 31.6 One comment challenges a lack of evidence for the 150-home figure. This comments also notes that a previous HELAA identified much larger potential capacity and highlights that the allocation may lead to pressure for far more than 150 units.
- 31.7 A further comment suggests other rail-connected villages may be more appropriate for larger allocations.
- 31.8 Comments indicating support for the allocation support distributing growth more evenly across the district rather than focusing on larger towns.
- 31.9 Several comments agree that Area L relates well to the built-up area, suggesting that the location is sustainable, outside the conservation area, and well-contained in landscape terms.
- 31.10 Some commenters feel that the 150-home figure is too low, highlighting that full capacity could be upwards of 300 dwellings if multiple land parcels are included, suggesting that the allocation should extend north/east (e.g., along Mount Owen Road and Aston Road). These comments suggest that Bampton is under-utilised given its Tier 2 status.
- 31.11 One comment of support suggests that the HELAA assessment relied on incorrect flood zone mapping.

- 31.12 Another comment that supports development suggests that demand helps sustain bus services and should contribute to service enhancements, especially during the evenings and on Sundays.
- 31.13 One comment notes that growth in Bampton could support wider Carterton-area infrastructure.
- 31.14 Alternative site proposals which are suggested by comments include Land south of Aston Road, Land west of Station Road (which is suggested as a more sustainable location with better access to the village centre) and North of Bampton as it is perceived as better for traffic movements and avoiding pressure on the village centre.

Question 31 Area M – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **Infrastructure capacity and service deficiencies exist**
- **There are concerns regarding the conservation area & character impact**
- **Suitability of Aston as a development location is questioned**

- 32.1 Many comments suggest community opposition, citing major concerns that Aston cannot accommodate further development, having already experienced significant recent growth without matching infrastructure improvements.
- 32.2 It is suggested that roads are in very poor condition (such as North Street, Aston Road and the B4449) and narrow, unsafe with lorry issues and only patch repairs.
- 32.3 Comments also highlight public transport as a concern, with infrequent bus service and no evening or Sunday services, which is seen as promoting car dependence.
- 32.4 Other infrastructure concerns include flooding and drainage, with existing surface water flooding, no sewage capacity and a risk of environmental harm. It is also cited that Bampton GP is oversubscribed and understaffed, Aston Primary School is at/near capacity with no planned expansion and there is only one, volunteer run shop and one part-time pub.
- 32.5 Many comments emphasise Aston's Conservation Area status, suggesting that development would harm rural views, openness and heritage setting with a request for a proportionate Heritage Impact Assessment. Some commenters note the perception that they face strict restrictions on home alterations while large developers appear exempt.
- 32.6 Some comments suggest that Aston is less sustainable than other settlements (such as Milton-under-Wychwood and Bampton). It is noted that walking/cycling routes are inadequate, with no continuous safe links to nearby towns in existence.
- 32.7 Potential increases in noise, pollution and harm to biodiversity are also noted.

- 32.8 One comment notes that previous archaeology investigations have revealed features and that further mitigation is required.
- 32.9 Another comment states that sustainable access details are lacking and must be addressed.
- 32.10 Comments note that Area M is already subject to two active applications, and the consultation document should not prejudice their determination.
- 32.11 One comment suggests that the map is inaccurate as it does not show the new development north of Marsh Furlong where 30+ dwellings have been built.
- 32.12 Some supportive comments suggest that it appears to be a logical infill/consolidation and that Aston should contribute to overall district housing needs as smaller rural developments help distribute growth more equitably across the district.
- 32.13 One comment also suggests that some bus service improvements could be supported by development.
- 32.14 One comment supports allocations in Aston generally suggests that the current site may not deliver 40 homes due to sensitivity.

Question 32 Area N – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **Stakeholders consider that the site is fundamentally unsuitable for development due to its protected landscape, heritage setting and environmental constraints**
- **Respondents highlight that Burford’s infrastructure cannot support more development — especially roads, school capacity, drainage and the GP surgery**
- **Feedback indicates that there is little or no proven local need for the development**

- 33.1 Comments suggest a strong opposition to the allocation of this site.
- 33.2 Many comments emphasise that building here would cause unacceptable harm to protected landscape as the site lies wholly within the Cotswolds National Landscape, with NPPF paragraph 190 stating that major development in an AONB should be refused except in exceptional circumstances, with it cited that none have been shown.
- 33.3 Comments also suggest that development would cause urban sprawl, harm veteran/ancient woodland and erode the historic rural edge of Burford, with it recommended that the whole site not be allocated, or at most only half (much smaller) could be considered.
- 33.4 Severe traffic and road safety problems are emphasised by comments as being a strong concern. Daily gridlock, dangerous driving, ‘rat-running’ and narrow medieval streets

unusable for modern traffic are cited. Sheep Street is described as a single-lane that is regularly blocked, with vehicles parked on both sides. Tanners Lane is described as a single track with no pavements, used by primary and secondary school children and for nursery drop-offs, dog walkers, families and recreation ground users. Priory Lane and High Street are described as already congested and unsafe.

- 33.5 Comments perceive that adding ~150 cars (70 houses + service vehicles + coach park) would make all routes unsafe for pedestrians, increase air pollution, risk blocking emergency access and drive more 'rat-running' through Witney Street, Barns Lane and Pytts Lane.
- 33.6 These traffic impacts are seen as severe and unacceptable.
- 33.7 Other infrastructure concerns which are raised by comments describe Burford Primary School as oversubscribed (50% over in one year), with the site seen as unable to expand further and Burford Surgery as at or beyond capacity, with the registering of new patients suspended.
- 33.8 Many comments suggest that the development is socially unfair, as it causes wider educational inequality.
- 33.9 Historical and archaeological importance of the site is noted, with it cited that the site includes or borders Battle Edge (AD 752), ancient woodland belonging to Burford Priory and proximity to Grade I listed Burford Priory and the Conservation Area. A full Heritage Impact Assessment is requested along with an archaeological survey (human remains have previously been found).
- 33.10 One comment suggests that the historic harm alone should prevent allocation.
- 33.11 Flooding and drainage is a concern which is highlighted. Multiple comments note that the field lies on a steep slope, with water regularly running onto Sheep Street, creating flooding and dangerous ice. Commenters believe that hard surfacing (roads, roofs, car park) would worsen flooding, runoff into Priory Woods and downstream sewage overflow in the Windrush. It is cited that the infrastructure delivery reports show Burford's drainage and water supply are already fragile.
- 33.12 Comments suggest concern regarding environmental and biodiversity harm, including the impact on ancient woodland and wildlife, loss of green space essential for wellbeing, the threat to mental health, ecology, and views and negative impact on dark skies and tranquillity.
- 33.13 One comment insists the site must be avoided or buffered to protect ancient woodland.
- 33.14 Comments indicate a perceived lack of demonstrated housing need, citing many unsold homes at Cotswold Gate and across OX18. It is also stated that Burford has already grown by 25% from the new estate and that another 70 homes would equal 34% growth in 4 years which is seen as disproportionate for a historic small town.
- 33.15 It is stated by some comments that WODC must show "exceptional local need", which it is seen to not have done.

- 33.16 Comments highlight concern regarding harm to Burford's economy and tourism, stating that Burford's economy relies on its medieval character, heritage setting, landscape and visitor appeal.
- 33.17 Comments indicate the perception that more housing and traffic will result in fewer visitors, with a coach and car park on Sheep Street harming Burford's brand. It also cites that tourism reports show traffic is already the town's greatest weakness.
- 33.18 It is noted by some comments that a 70-home scheme on Cole's Field (similar context) was strongly opposed by Burford Town Council and WODC in 2023 and it is seen that the same reasons apply here, yet some councillors now support Area N.
- 33.19 It is noted that Burford Town Council formally asks WODC to remove Area N entirely from the Local Plan.
- 33.20 Some comments propose alternative sites, including Tannery Yard / Burford Laundry (brownfield land), Burford Caravan Park (brownfield land), smaller infill only (≤ 10 homes per site) and A40 corridor options for coach parking, not Sheep Street.
- 33.21 Several supportive comments suggest that the site is sustainable and could include parking. One comment recommends using S106 money to enhance infrastructure.

Question 33 Area O – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **Access and highway safety constraints are raised**
- **Landscape, conservation, and biodiversity impacts (Cotswolds National Landscape) are highlighted**
- **Insufficient local infrastructure and community capacity highlighted.**

- 34.1 Many comments express concern regarding access and highways, citing the perception that safe and suitable access cannot be achieved.
- 34.2 Comments suggest that access would rely on narrow 1970s residential streets, with heavy on-street parking, functioning as single-lane roads.
- 34.3 Comments also suggest that removing the Cottsway garages, to create access would eliminate vital parking and worsen congestion.
- 34.4 It is also cited by comments that it would be impossible for construction traffic to manoeuvre safely.
- 34.5 It is suggested that the Ditchley Road/The Slade junction already experiences blind corners, congestion and agricultural machinery conflicts and that emergency vehicles already struggle and would be further impeded.

- 34.6 Comments also note that Hundley Way is a bridleway, unlit and unsuitable, and already ruled out by Oxfordshire County Council.
- 34.7 Other concerns regard the impact on the Cotswolds National Landscape with the emphasis that the site lies wholly within the CNL, with this development seen as constituting major development, requiring “exceptional circumstances” which are not demonstrated.
- 34.8 It is also considered by some comments that a large estate on a prominent sloping site would introduce a hard urban edge, harm key views from Banbury Hill, Enstone Road and Hundley Way, diminish rural character and tranquillity and increase light pollution.
- 34.9 Some comments state that development *may* be possible if reduced in scale and subject to strong landscape mitigation.
- 34.10 Comments regarding ecology, wildlife and biodiversity suggest that the field and boundary trees are reported to host bats (protected species), barn owls, deer, foxes, hedgehogs, wild orchids and roman snails.
- 34.11 Other ecological issues raised include that the site lies within a Great Crested Newt impact risk zone, that tree/hedgerow removal on the boundary is alleged, some during nesting season, the emerging Local Plan requires 20% Biodiversity Net Gain, which the scheme is said not to meet and the site is identified within the Local Nature Recovery Strategy (LNRS).
- 34.12 Further infrastructure concerns highlight that Charlbury’s infrastructure is at capacity including that the primary school is full, the medical centre cannot meet current demand, town centre and station parking are heavily oversubscribed, sewerage and power supply issues already exist (such as frequent power outages and drain overflows) and public transport (buses) is seen as too infrequent to mitigate car dependency.
- 34.13 Many comments cite conflict with Charlbury Neighbourhood Plan, Local Plan policies (current and emerging) and the NPPF. Charlbury Neighbourhood Plan emphasises small-scale, locally needed housing, not major greenfield expansion.
- 34.14 Other comments highlight Charlbury’s locally assessed affordable housing need (23 homes) which is seen as far fewer than the 40 proposed. It is also cited that this site was previously rejected during the last Local Plan examination.
- 34.15 Social, safety and community impacts are emphasised by comments, including concerns regarding the loss of children’s safe play areas and cycle training zones, a fear of increased accidents, unsafe pedestrian routes, and conflict with elderly residents, a loss of green space used informally by the community, concerns about noise, dust, disturbance during construction and long-term and some references to potential antisocial behaviour from poorly integrated high-density development.
- 34.16 Concerns regarding flooding, drainage and run-off state that the site is on a sloping field, increased impermeable surfaces would cause runoff into existing homes, no credible SuDS strategy has been proposed and that it contradicts Local Plan policy on flood risk (EH7).
- 34.17 A smaller number of comments suggest that Charlbury needs new housing or affordable housing, with good rail and bus links and that development could support local services.

- 34.18 Another comment emphasises that the site has passed HELAA/SHELAA assessments and that the proposal can enhance open space provision (a new play area).
- 34.19 A further comment suggests that the site is “potentially suitable” if the scale is reduced, the layout avoids western slopes, strong landscape mitigation is applied and the design uses Cotswold stone and local vernacular.

Question 34 Area P – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **Access and movement constraints (highways, pedestrian safety and sustainability) are highlighted**
- **Environmental, landscape and heritage impacts (CNL, conservation area and the setting of assets) are of concern**
- **There are flooding, drainage and ground condition concerns**

- 35.1 Comments indicate strong highways & access concerns, with Fowler Road (B4022) seen as narrow, twisting, with blind bends, fast traffic, and no pavements. Roads are considered unsafe for vehicles, especially with increased traffic from 40 homes and it is highlighted that there is no safe pedestrian route to Charlbury, the school, station or services.
- 35.2 Other comments indicate issues with flooding and drainage, with water flowing from Woodstock Road and Stonesfield Lane into the site. It is stated that a persistent pond forms near the proposed access, lasting for weeks in winter and the main sewer runs along the high point of the field, raising questions about capacity for additional homes.
- 35.3 Landscape and environmental harm is indicated, with the site lying within the Cotswolds National Landscape and Charlbury Conservation Area. Development here is seen as highly visible on approaches to the town, damaging to the scenic rural character and potentially harmful to wildlife (hedgehogs, bats, birds, hares and toads).
- 35.4 There are also comments which indicate concern about illegal earthworks already altering landscape and habitat.
- 35.5 One comment states concern that the site has not been assessed for major development status.
- 35.6 Comments which emphasise infrastructure highlight concerns that town centre parking is already saturated, the school and GP surgery capacity is under strain, development is seen as an isolated satellite, not integrated with the town and there will be an increased car dependency, due to lack of walkable access.
- 35.7 Comments suggest that public transport is infrequent and walking/cycling infrastructure substandard. It is highlighted by one comment that investment is required to make active travel realistic but that it would be unlikely to be viable.

- 35.8 Heritage concerns highlight a close proximity to Grim’s Ditch (Scheduled Monument), Cornbury Park (Grade II*) and Cornbury House (Grade I). Potential harm to key views and archaeological assets is suggested.
- 35.9 A proportionate Heritage Impact Assessment is requested by one comment due to multiple heritage assets.
- 35.10 It is suggested that there is a high potential of archaeological due to proximity to Grim’s Ditch.
- 35.11 Conflict with planning policy is suggested, including conflict with the Charlbury Neighbourhood Plan 2031. It is also suggested that the site does not align with principles of sustainable development, represents major development in the CNL without exceptional justification and exceeds the identified local need (23 homes), which are seen as already met by other proposals.
- 35.12 One comment suggests that they would expect development to meet local need for smaller/affordable homes.
- 35.13 Comments also suggest that the site lies beyond the defined edge of Charlbury and extends development southwards onto higher ground, altering the settlement pattern.
- 35.14 One commenter supports development in principle, emphasising that Charlbury is a Tier 2 Service Centre and a sustainable location and that the site’s constraints can be addressed with good design. This commenter disputes flooding issues and highlights an existing field access.
- 35.15 A smaller number of comments express support for the site, noting that Charlbury needs more housing, if access and infrastructure issues are addressed.
- 35.16 One commenter considers that this area is preferable to Area P.
- 35.17 Another comment suggests that Area P could be acceptable only if it is significantly reduced and confined to lower ground, following historic field boundaries.

Question 35 Area Q – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **Minerals and waste safeguarding is seen as a major policy obstacle**
- **There are concerns regarding connectivity, infrastructure and settlement form**

- 36.1 Several comments consider Area Q as suitable and logical location for development, with it described as a logical extension of the village, preferable to development west of the A415 and proportionate in scale.

- 36.2 One comment emphasises Ducklington’s sustainability (a Tier 3 settlement, proximity to Witney and good public transport) and indicates that the site integrates well with existing built form and is unconstrained.
- 36.3 One comment notes concerns which include a previous appeal dismissal (2018) due to landscape/character impacts, depth/size of the site and resulting proximity to existing homes, flooding and drainage issues in the area, design concerns in the current application (such as traffic calming, bus stops and open space).
- 36.4 Other comments note that the site lies within a Mineral Safeguarding Area for sharp sand and gravel and that development could sterilise mineral resources, with a conflict of Policy M8 – a Mineral Resource Assessment is therefore recommended.
- 36.5 Some comments suggest that the site is quite isolated and additional footpath links and bus stop improvements are needed. It is perceived that there is insufficient information on sustainable access—walking, cycling and public transport.
- 36.6 It is noted that the site is adjacent to a priority habitat and is near to Ducklington Mead SSSI and that careful consideration is needed.
- 36.7 Comments indicate that archaeological evaluation has found Roman and Saxon features, including a Roman trackway, enclosure, field system and pottery and Saxon pits and requires mitigation excavation prior to development.
- 36.8 One comment opposing the site suggests that it is detached and poorly integrated, infrastructure-constrained, dependent on sewage capacity improvements and less suitable than growth in Milton-under-Wychwood.

Question 36 Area R – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **The perceived unsustainable, isolated location is seen as conflicting with policy and landscape protection**
- **There is inadequate infrastructure (sewage, roads and services)**
- **Flood risk and downstream impacts are highlighted**

- 37.1 Many Comments cite flooding as a concern, stating that the field forms part of the functional floodplain for the River Evenlode and its tributaries and floods annually and often severely, sometimes causing road closures.
- 37.2 It is suggested that building on the site would increase flood risk downstream, particularly in Bledington, which already experiences repeated property flooding and that approximately half of the site lies within Flood Zone 3 or 3b, where housing is prohibited.

- 37.3 Comments also indicate concern that the sewage infrastructure is already over capacity, stating that the Chipping Norton Sewage Treatment Works (which serves Kingham/Bledington) cannot currently manage flows, causing frequent raw sewage discharges into the Evenlode and with upgrades not expected meet targets until 2040-2045. It is felt that adding further housing would worsen pollution and increase environmental harm.
- 37.4 Poor road access and traffic impacts are noted by comments as concerns, with commenters describing narrow rural B-roads, single-track sections, and a weak bridge in addition to heavy and fast traffic already posing a risk to pedestrians, livestock, cyclists and horse riders. It is perceived that development would intensify dangerous conditions and increase car dependency.
- 37.5 It is also suggested that congestion is exacerbated by the Festival and station users.
- 37.6 Many comments suggest that, despite being next to a railway station, the site is 1–2 km from Kingham or Bledington, with no safe footpaths and that local facilities (such as shops, schools and health services) are too distant for walking, especially given dangerous roads.
- 37.7 It is also noted by comments that there is no meaningful bus service and that development would create an isolated housing estate, disconnected from any village.
- 37.8 Conflict with the proposed settlement hierarchy is also indicated by comments, highlighting that Kingham is a Tier 4 medium village, where only 1–10 dwellings are supported and that 70 dwellings is considered wholly disproportionate. It is suggested that, because the site is detached, it can instead be viewed as Tier 5 open countryside, where no allocations are permitted.
- 37.9 Many comments raise landscape concerns, emphasising that the site lies within the Cotswold National Landscape and that development here would be major development, which requires exceptional circumstances which it is not seen to have demonstrated in this proposal.
- 37.10 Comments suggest that development of the site would harm settlement separation between Kingham and Bledington, views of the Evenlode Valley, tranquillity and dark skies and local ecology including otters, kingfishers, egrets and deer, with a detailed landscape assessment concluding that the proposal is not acceptable.
- 37.11 Other infrastructure concerns indicated by comments include that Kingham and Bledington schools are already full, the proposal would deliver an estate with no natural community identity, there are risks of it becoming a commuter/second-home enclave, not addressing local housing need and local roads and emergency access already strained during major events.
- 37.12 A small number of comments express support including proximity to the rail station, which offers a sustainable travel option, that it can help address housing and affordability needs and provide the potential for business units, biodiversity net gain, transport hub, and environmental design measures. These comments indicate that significant constraints must be addressed, including public transport upgrades, power and water capacity, flooding constraints and careful landscape integration.

- 37.13 Some comments suggest alternative sites, including smaller-scale development within Kingham village (for example KING002), higher-density development limited to the site's eastern flank and prioritising more sustainable sites in Milton-under-Wychwood.

Question 37 Area S – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **There are sustainability and transport constraints concerns**
- **Environmental sensitivity and flood risk is highlighted**
- **The adequacy of local infrastructure (schools, services and roads) is questioned**

- 38.1 Many comments suggest that Middle Barton is not sustainable for development due to a lack of public transport, high car dependency with no realistic prospect of change and an inability to meet “genuine choice of modes” required by the NPPF.
- 38.2 Concerns regarding infrastructure and local services are highlighted by comments, with perceived insufficient school capacity, medical services, traffic management and flood mitigation, especially relating to the Dorn and recent flood impacts.
- 38.3 Some comments suggest that Middle Barton does not meet the criteria of a “large village” with everyday services and should not be within Tier 3 of the settlement hierarchy.
- 38.4 Environmental and biodiversity concerns raised by comments relate to the proximity to Middle Barton Fen SSSI and the need for hydrological assessment, the potential loss of priority habitats and red-list species nesting areas and the risk of increased flooding to existing homes.
- 38.5 Minerals and waste concerns are noted with the northern boundary touching a soft sand Mineral Safeguarding Area. It is recommended that mitigation should be incorporated to avoid sterilising mineral resources, although the site does not pose a major constraint.
- 38.6 Some comments suggest planning process and policy concerns including the recent planning approval for 80 homes “slipping through” after previous refusals, perceived contradictions with WODC policies on sustainable development, car dependency reduction, and environmental protection and critique of the settlement hierarchy (for example why Tier 5 exists if no villages were moved).
- 38.7 A comment suggesting support for the site considers that Middle Barton does have a good range of facilities (as per WODC hierarchy), that development helps meet local housing needs, including affordable housing, that population stagnation threatens the viability of the primary school and that environmental impacts are manageable through mitigation, including measures for the SSSI.

- 38.8 One comment suggests alternative settlements (for example Milton-under-Wychwood), which are seen as more sustainable, better connected, larger and more capable of absorbing growth and less likely to compromise plan soundness.

Question 38 Area T – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **Severe infrastructure constraints (sewage, flooding, utilities and roads) are highlighted**
- **There are scale, suitability and spatial strategy conflict concerns**
- **Environmental, mineral and heritage constraints are raised**

- 39.1 Flooding and drainage concerns are cited by many commenters, with it noted that Standlake lies within or near the Upper Thames floodplain and has a history of frequent flooding, groundwater issues and surface water run-off into the village, with regular reports of flooding of homes, roads and sewers, including historic events in 2007.
- 39.2 Comments suggest that the fields at The Downs act as a natural sponge / flood attenuation area and development is feared to exacerbate village flooding, especially downhill in the High Street and surrounding areas. SuDS solutions are viewed as insufficient in prolonged wet conditions and many comments describe sewage backflow, tankers operating 24/7 in winter, and sewage entering gardens.
- 39.3 Further comments highlight that the sewage network is already over capacity, regularly requiring tankers and emergency pumping, with failed upgrades to ageing infrastructure. These comments indicate concerns that 200 new homes would worsen sewage discharge into watercourses and increase pollution.
- 39.4 Comments suggest that the proposed scale of development is disproportionate, with many respondents highlighting that 200 homes is incompatible with Standlake's classification as a Tier 3 Large Village, which are intended for 1–50 homes (small/medium scale growth).
- 39.5 Comments consider that 200 homes would a 33% increase, which is seen as far above policy guidance and there are claims that such a proposal contradicts the Local Plan's own spatial strategy.
- 39.6 Comments highlight that Tier 2 centres (such as Charlbury and Burford) will receive fewer homes.
- 39.7 Comments indicate that there are infrastructure limitations, with very limited village facilities. Respondents highlight that there is no GP surgery or NHS dentist, no secondary school and no local medical services. There is one small shop and Post Office with comments suggesting that a new shop at The Downs would undermine the existing one.

- 39.8 It is also noted by commenters that the primary school is close to capacity, with children already sent to other villages, that there is no mains gas and unreliable electricity supply with frequent outages and that the village has narrow roads, limited pavements, poor cycle links, and traffic congestion on the A415, especially at Newbridge.
- 39.9 Standlake is described by comments as car-dependent, with limited opportunities for modal shift. It is highlighted that bus services exist but are seen as infrequent, slow or poorly aligned with commuting needs and that a lack of walking/cycling infrastructure makes the site remote from village centre amenities (over ½ mile to school).
- 39.10 Comments suggest that the site is productive agricultural land, contributing to local food security. There are also concerns that development would destroy habitat corridors used by migratory birds, deer, hares, and other wildlife and would have impacts on the Lower Windrush Valley, a sensitive ecological area.
- 39.11 Comments indicate strong concern that the development would destroy the linear historic character of Standlake and that The Downs site is physically detached, creating a “bolt-on estate” separated from the village. It is suggested that there is a risk of creating a fragmented settlement rather than strengthening the existing village form.
- 39.12 There are multiple references to known and potential Bronze Age, Iron Age, Roman, Saxon, and medieval remains, with archaeological evaluations already showing significant features; comments suggest that more investigation is required.
- 39.13 Comments suggest major objections to the site’s proposed allocation, citing that the site lies within a Mineral Safeguarding Area for sharp sand and gravel—a strategic reserve. It is highlighted that development could sterilise mineral resources, conflicting with Oxfordshire’s Minerals & Waste Local Plan. Comments also suggest that a Mineral Resource Assessment is required as one is yet to be provided.
- 39.14 Comments highlight concerns about impacts on neighbouring councils, including the flood-sensitive Thames catchment, the A420 Kingston Bagpuize roundabout capacity and the need for coordinated infrastructure planning.
- 39.15 A smaller number of comments indicate support for the site, with some suggesting that it could support 300–500 homes, a new school and facilities and that it is relatively unconstrained and has good bus links.
- 39.16 Two comments suggest support for the development if it delivers nature recovery or enhanced services.

Question 39 Area U – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **Fundamental infrastructure failures (sewage, flooding and drainage) are highlighted**
- **The scale of development is seen as disproportionate and not justified by need**
- **It is considered that village services, transport and social infrastructure cannot support growth**

- 40.1 The vast majority of comments suggest strong opposition to the proposed allocation of this site.
- 40.2 Concerns are raised regarding flooding, drainage and surface water. It is suggested that Area U is low-lying and functions as a flood catchment/sink, protecting the village and that a bund already exists on the site because of severe runoff from Fox Hill and surrounding slopes.
- 40.3 Multiple comments offer evidence that roads become 'rivers', houses require sandbagging, floodwater overtops the bund and that surface water flows directly across Area U into the village. Comments suggest that flood events are increasing with climate change and voice concerns that development would be unsafe, unsustainable and would worsen flooding for existing homes.
- 40.4 Many comments suggest a sewage and wastewater system failure, citing permit breaches by Tackley sewage treatment works, dry-weather discharges, raw sewage emerging through manholes near the school, shop and hall and discharges into local brooks. Comments highlight that no confirmed upgrade exists and that it would be irresponsible to allocate new housing without fixing current failures.
- 40.5 Some comments suggest that Tackley has already experienced large recent growth, with 96 new homes since 2016. It is highlighted that this is equivalent to ~25–30% growth in under 10 years with it perceived that this is far beyond "proportionate rural growth" and that the village has already 'done its bit.'
- 40.6 Infrastructure constraints are highlighted by comments, stating that Tackley CE Primary is full, already stretched by taking extra pupils from a closed neighbouring school with no space/capacity for additional children. Comments additionally state that Woodstock and Kidlington GPs cannot accept new patients and are already overstretched.
- 40.7 Roads are described by commenters as narrow, with poor drainage and limited parking. Congestion at school/station pinch-points is noted, in addition to speeding concerns.
- 40.8 Train services are considered to be infrequent, unreliable and not viable for commuting, with the Up-platform cited as inaccessible due to a 'temporary' footbridge.
- 40.9 One comment notes that walking access to station inadequate and requires major upgrades.

- 40.10 Community services are described as one small, volunteer-run shop and it is noted that there is limited employment in the village. Commenters suggest that the village lacks the services of a 'large village' and designation as such is misleading.
- 40.11 Comments note that Area U is near / partly within a Nature Recovery Zone, which supports deer, hares, curlew and farmland birds and daily sightings of red kites, sparrowhawks. Other comments suggest concerns about loss of wildlife habitat, light pollution from new development and damage to ecological networks.
- 40.12 One comment notes ancient woodland nearby, requiring a 50m buffer if the site is allocated.
- 40.13 Several commenters suggest that the land could instead become a community nature recovery project.
- 40.14 Comments suggest concerns about suburbanisation of a rural village on the edge of the Cotswolds, due to a heightened visual impact due to topography, incongruous modern architectural style of recent developments and the impact on the conservation area and listed buildings.
- 40.15 One comment requires a needs Heritage Impact Assessment due to the proximity of listed buildings.
- 40.16 A further comment highlights cropmarks as being present with an archaeological assessment required.
- 40.17 Misalignment with local housing need is also cited, with a Housing Needs Survey (2025) showing that only 13 households are needed over 3–5 years, with mostly small, 1–2 bedroom affordable homes. A 70-home estate is seen as wholly disproportionate.
- 40.18 One comment concludes that Area U is unsound based on the NPPF tests, with it cited that it contradicts the NPPF on flood risk, pollution, infrastructure first, rural proportionality and nature recovery. It states that the site is not justified, not effective and not positively prepared.
- 40.19 This comment requests that Area U is removed entirely from the Local Plan and that any growth at Tackley should be small, locally led, linked to demonstrable need, supported by infrastructure and potentially delivered via rural exception/infill and not estates.
- 40.20 Two submissions indicate support for the inclusion of Area U, with one stating that the village has good rail and bus links.

Question 40 Area V – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **There are transport unsustainability and access constraint concerns**
- **Boundary accuracy, aviation safeguarding and brownfield extent is questioned**
- **There is debate over the appropriate future use of the site**

- 41.1 Some comments support the expansion and modernisation of the employment cluster, suggesting potential for mid-tech and light industrial businesses, upgrading an underperforming site and strengthening an existing northern district employment hub (including proximity to SOHO Farmhouse and the Mullin project).
- 41.2 Some other comments suggest support for the proposal conditional on major road upgrades and sustainable transport solutions being provided.
- 41.3 Several comments express strong concern about the site's unsustainable location, with it highlighted that there is no realistic public transport access (the nearest bus stop is over 1 hour's walk or 20+ minutes cycle), cycling conditions are perceived as unsafe on fast B-roads with no cycle infrastructure and that a heavy reliance on private car travel is seen as inevitable.
- 41.4 Some commenters suggest that the site cannot meet National Planning Policy Framework (NPPF) standards for directing significant development to sustainable locations and there are doubts about whether innovative transport solutions or travel plans could meaningfully offset car dependency.
- 41.5 Several comments note that the northern boundary overlaps or comes too close to the runway, sometimes directly intersecting it – this is seen as either an error or a threat to aviation safety and an important local amenity.
- 41.6 Other concerns indicate that large parts of the site are not brownfield, stating that only areas with buildings qualify, while much of the airfield is greenfield.
- 41.7 A few commenters suggest redirecting expansion east or west instead of north, to avoid the active runway.
- 41.8 Comments highlight evidence of nearby Iron Age, Bronze Age and other archaeological remains, which may indicate features within the site, especially in the less-developed western airfield area. It is suggested that further assessment likely required.
- 41.9 One comments notes that a permitted waste management site lies within the proposed allocation and that future policy must ensure it is not compromised.
- 41.10 Multiple comments emphasise the need for the protection of the runways and grass airstrip, calling them a valued community and recreational resource.
- 41.11 There is also a suggestion that aircraft hangar space could be integrated into a revised plan.

- 41.12 Some comments advocate for major housing development rather than employment, suggesting that it is a brownfield site and should be treated similarly to constrained sites in towns like Witney or Carterton.
- 41.13 One comment proposes extending the employment allocation to include the former Enstone Quarry, which they consider to be brownfield and suitable for remediation.

Question 41 Area W – Is this a suitable location for non-strategic development? What are the reasons for or against development in this location?

Key matters arising from feedback:

- **The protection and future of essential public services (Hospital, GP and Police) is imperative**
- **The impact of losing Woodford Way Car Park is of concern**
- **Deliverability and infrastructure capacity concerns exist**

- 42.1 A number of comments agree that the site has potential for redevelopment and could support higher-density, mixed-use development, including new housing (potentially including affordable/social rent homes), better use of brownfield land, upgraded healthcare facilities, with suggestions for a modernised community hospital and expanded services, potential expansion space for Witney Abingdon College and improved placemaking and urban design.
- 42.2 Several comments suggest support for redevelopment if existing essential functions (healthcare, policing, parking) are retained or relocated appropriately, high-quality design, density and placemaking are prioritised and evidence-based decision-making is applied.
- 42.3 One comment suggests that, despite being brownfield, constraints mean the site is unlikely to be deliverable within the plan period.
- 42.4 Many comments raise strong concerns about the loss of Woodford Way car park, which is described as essential for residents with limited public transport, important for workers and hospital/library visitors and already heavily used.
- 42.5 Comments suggest that replacement long-stay parking must be found first that Witney still depends on car access and that loss of central parking would damage access to key services.
- 42.6 Concerns about losing healthcare and emergency services are made by comments, with strong opposition to any redevelopment which results in the relocation or loss of Witney Community Hospital, GP surgeries or the Police station and associated services. These existing services are seen as vital for safeguarding and health access and providing a rapid response and that relocating these to car-dependent areas would be a policy failure.
- 42.7 Other concerns that are expressed include limited bus access in the area, the need for evidence of utilities and service capacity and the importance of integrating any development with wider local infrastructure.
- 42.8 Some comments highlight low tree cover in central Witney and the need for clear ecological protections and increased tree cover in any redevelopment. The presence of

priority deciduous woodland and good-quality semi-improved grassland within the area boundary is also noted.

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**WEST OXFORDSHIRE
DISTRICT COUNCIL**

www.westoxon.gov.uk

**West Oxfordshire
Local Development Scheme (LDS)**

March 2026

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1. Introduction

- I.1 This is the West Oxfordshire District Council Local Development Scheme (LDS). It explains what planning policy documents the Council already has in place and what will be prepared during the three-year period March 2026 – March 2029.
- I.2 During the three-year period covered by the LDS, local government reorganisation is expected to take place across Oxfordshire. The exact form and timing of any changes are not yet known and may affect the structure and responsibilities of existing councils. However, the LDS remains an important document in setting out the Council’s intended programme for preparing and reviewing planning policy documents.
- I.3 The documents identified within it, in particular the emerging West Oxfordshire Local Plan, will continue to have effect once adopted, regardless of any changes to local government arrangements. This ensures continuity in the planning framework and provides clarity for communities, developers and stakeholders throughout the transition period and beyond.

2. West Oxfordshire Local Plan 2031

- 2.1 The current [West Oxfordshire Local Plan 2031](#) was formally adopted on 27 September 2018. The plan provides an overall framework for growth in the period up to 2031.
- 2.2 Because the Local Plan became five years old in September 2023, a [formal review](#) was undertaken in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 The review concluded that although the adopted local plan policies remain generally consistent with national policy, many of them could usefully be strengthened and updated, in particular those policies relating to the plan’s housing requirement given they are based on evidence dating from 2014.
- 2.4 Work on a new Local Plan to 2043 is therefore now well underway as outlined below.

3. West Oxfordshire Local Plan 2043

- 3.1 The District Council is currently in the process of producing a new Local Plan. Originally it was proposed that the plan would cover the period up to 31st March 2041, but to ensure a minimum 15-year period from the anticipated date of adoption, the end date is proposed to be extended to 31st March 2043.

being supported by central Government through its locally led garden village, towns and cities programme.

- 4.2 The planning of the garden village is being led by a separate [Area Action Plan](#) (AAP) which, when adopted, will form part of the statutory development plan for West Oxfordshire.
- 4.3 The AAP was formally submitted in February 2021 and following hearing sessions in June/July 2021 and further work on the phasing of infrastructure, the Inspector published his final report in March 2023, concluding that the AAP is sound subject to a number of Main Modifications.
- 4.4 However, following a successful 3rd party legal challenge, those parts of the Inspector's report which related to AAP Policy 2 – Net Zero Carbon Development have been quashed and in April 2024, the examination was re-opened, with a new Inspector appointed to re-consider Policy 2.
- 4.5 A one-day hearing session was held on 30 June 2025 and the Inspector's Post-Hearing Letter was received on 1 August 2025. The letter confirmed that the Council's proposed approach towards Policy 2 is consistent with national policy but concluded that a number of Main Modifications are needed to ensure the policy can be found to be 'sound'.
- 4.6 Public consultation on the Main Modifications took place from 3 October – 14 November 2025 and the Inspector's final report was received on 7 January 2026 confirming that the AAP can now be adopted, subject to the proposed modifications.
- 4.7 West Oxfordshire District Council resolved to adopt the Salt Cross Garden Village AAP as a development plan document on 25 February 2026.
- 4.8 Further information is available on the Salt Cross Garden Village AAP web page² and further information on the purpose, scope and timing of the AAP is set out at Appendix 1.

² <https://www.westoxon.gov.uk/gardenvillage>

5. Supplementary Planning Documents (SPDs)

5.1 Supplementary planning documents do not form part of the statutory development plan but are important material considerations in the determination of planning applications. Their main purpose is to elaborate on specific local plan policies and explain in more detail how those policies will operate.

5.2 At present, the Council has four adopted SPDs:

- West Oxfordshire Design Guide SPD – adopted in 2016
- Affordable Housing SPD – adopted in October 2021
- Developer Contributions SPD – adopted in July 2023
- Combe Village Design Statement SPD – adopted in July 2023

5.3 These are all available [online](#).

6. Neighbourhood Planning

6.1 Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area.

6.2 There are currently ten adopted Neighbourhood Plans in West Oxfordshire including:

- Brize Norton Neighbourhood Plan (adopted 11 September 2025)
- Cassington Neighbourhood Plan (adopted 26 June 2023)
- Charlbury Neighbourhood Plan (adopted 14 June 2021)
- Chipping Norton Neighbourhood Plan (adopted 15 March 2016)
- Eynsham Neighbourhood Plan (adopted 6 February 2020)
- Hailey Neighbourhood Plan (adopted 2 September 2019)
- Milton under Wychwood Neighbourhood Plan (adopted 26 June 2023)
- Shilton Neighbourhood Plan (adopted 2 September 2019)
- South Leigh Neighbourhood Plan (adopted 8 January 2019)
- Woodstock (adopted 23 January 2023)

6.3 There are seven other Neighbourhood Plans currently in progress including:

- Ascott under Wychwood Neighbourhood Plan
- Ducklington Neighbourhood Plan
- Hanborough Neighbourhood Plan
- Minster Lovell Neighbourhood Plan
- North Leigh Neighbourhood Plan
- Stonesfield Neighbourhood Plan
- Wootton by Woodstock Neighbourhood Plan

- 6.4 Because the progress and timing of neighbourhood plans are beyond the control of the District Council, the LDS does not include any information on their anticipated timetables. Further information can however be obtained from the District Council's [website](#).

7. Statement of Community Involvement (SCI)

- 7.1 A Statement of Community Involvement (SCI) explains how local communities and other stakeholders will be engaged in the preparation of the Local Plan and other related documents. It also provides information about how local communities and other stakeholders will be engaged in relation to the determination of planning applications.
- 7.2 The Council's most recent SCI was adopted in February 2025 and is available to view [online](#).

8. LDF Monitoring Report

- 8.1 In accordance with national planning regulations the Council is required to produce a monitoring report addressing various matters including plan progress and implementation, neighbourhood planning, CIL (where applicable) and the duty to co-operate.
- 8.2 The Council's most recently published monitoring report covers the period 1st April 2024 – 31st March 2025 and is available [online](#).

9. LDS availability and updates

- 9.1 The LDS must be made publicly available and kept up-to-date.
- 9.2 In terms of availability, a copy of this LDS is available [online](#)
- 9.3 Hard copies are also available in the locations listed in the following table.
- 9.4 The LDS will be updated annually or more often if there are any significant changes in timescales or documents being prepared.

<p>West Oxfordshire District Council Witney Town Centre Shop 3 Welch Way Witney OX28 6JH Tel: 01993 861000 Open: Monday – Friday 9am to 5pm</p>	<p>Witney Town Council Town Hall Market Square Witney OX28 6AG Tel: 01993 704379 Open: Mon, Tues and Thurs 8.30am to 5pm, Wed 9.30am to 5pm and Fri 8.30am to 4.30pm.</p>	<p>Carterton Town Council 19 Alvescot Road Carterton OX18 3JL Tel: 01993 842156 Open: Monday – Friday 9.30am to 4.00pm</p>
<p>Chipping Norton Town Council The Guildhall Market Place Chipping Norton OX7 5NJ Tel: 01608 642341 Open: Monday – Friday 9am to 1pm</p>	<p>Bampton Library Old Grammar School Church View Bampton OX18 2NE Tel: 01993 850076</p>	<p>Burford Library 86A High Street Burford OX18 4QF Tel: 01993 823377</p>
<p>Carterton Library 6 Alvescot Road Carterton OX18 3JH Tel: 01993 841492</p>	<p>Charlbury Library Charlbury Community Centre Enstone Road Charlbury OX7 3PQ Tel: 01608 811104</p>	<p>Chipping Norton Library Goddards Land Chipping Norton OX7 5NP Tel: 01608 643559</p>
<p>Eynsham Library 30 Mill Street Eynsham OX29 4JS Tel: 01865 880525</p>	<p>North Leigh Library Memorial Hall Park Road North Leigh OX29 6SA Tel: 01993 882935</p>	<p>Stonesfield Library Village Hall Longore Stonesfield OX29 8EF Tel: 01993 898187</p>
<p>Witney Library Welch Way Witney OX28 6JH Tel: 01993 703659</p>	<p>Woodstock Library The Oxfordshire Museum Fletcher's House Park Street Woodstock OX20 1SN Tel: 01993 814124 07759 140531</p>	<p>Wychwood Library 29 High Street Milton-under-Wychwood OX7 6LD Tel: 01993 830281</p>

Appendix 1 – Document Profiles

West Oxfordshire Local Plan 2043	
Status	Development Plan Document (DPD)
Overview	The Local Plan will set out the overall framework for future growth in West Oxfordshire to 2043. This is expected to include strategic policies dealing with the overall strategy for the pattern, scale and quality of development as well as non-strategic policies dealing with other matters including site allocations and development management policies.
Geographical coverage	District-wide
Timetable	<p>Regulation 18 initial scoping consultation – August - October 2022 (COMPLETE)</p> <p>Regulation 18 focused consultation on draft plan objectives and spatial strategy options along with a ‘call for sites’ exercise – August – October 2023 (COMPLETE)</p> <p>Regulation 18 consultation on preferred policy options – June 2025 (COMPLETE)</p> <p>Regulation 18 consultation on preferred spatial options – November 2025 (COMPLETE)</p> <p>Publication of pre-submission draft Local Plan (Regulation 19) – June 2026</p> <p>Submission of pre-submission draft Local Plan (Regulation 22) – December 2026</p> <p>Examination and adoption – 2027</p>
Conformity	Prepared in conformity with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
Management arrangements	Document production to be led by the Council’s Planning Policy Team under the direction of the Planning Policy Manager. Cross Party Member Working Group established to oversee the process.

Resource requirements	Internal resources comprise the Council’s Planning Policy Team with input from other teams and services as appropriate via Local Plan Officer Working Group. External resources will be drawn upon in terms of the production of supporting technical evidence.
Community engagement	Engagement to be carried out in accordance with the requirements of the adopted Statement of Community Involvement (SCI).

Salt Cross Garden Village Area Action Plan (AAP)	
Status	Development Plan Document (DPD)
Overview	Supplements the Local Plan 2031 providing additional detail on the Oxfordshire Cotswolds Garden Village Strategic Location for Growth (SLG) – now referred to as Salt Cross Garden Village. The AAP will establish a vision for the garden village, supported by a series of core objectives and policies arranged on a thematic basis. A key focus of the AAP will be delivery and implementation.
Geographical coverage	Oxfordshire Cotswolds Garden Village Strategic Location for Growth (SLG) north of Eynsham
Timetable	<p>Submission – February 2021 (COMPLETE)</p> <p>Examination hearings – June/July 2021 (COMPLETE)</p> <p>Consultation on Main Modifications – September/November 2022 (COMPLETE)</p> <p>Inspector’s Report received – March 2023 (COMPLETE)</p> <p>Examination re-opened to consider Policy 2 - Net Zero Carbon Development – April 2024 (COMPLETE)</p> <p>Hearing Session – June 2025 (COMPLETE)</p> <p>Post-Hearing Letter – August 2025 (COMPLETE)</p> <p>Consultation on Main Modifications – (COMPLETE)</p> <p>Inspector’s Final Report – (COMPLETE)</p> <p>Adoption – (COMPLETE)</p>
Conformity	Prepared in conformity with the National Planning Policy Framework (NPPF) National Planning Practice Guidance (NPPG) and the West Oxfordshire Local Plan (2031).
Management arrangements	Document production to be led by the Council’s Planning Policy Team under the direction of the Planning Policy Manager.
Resource requirements	Internal resources comprise the Council’s Planning Policy Team with input from other teams and services as

	appropriate. External resources will be drawn upon in terms of the production of supporting technical evidence.
Community engagement	Engagement on the preparation of the document to be carried out in accordance with the requirements of the adopted Statement of Community Involvement (SCI).

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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>PROPOSED REFORMS TO THE NATIONAL PLANNING POLICY FRAMEWORK AND OTHER CHANGES TO THE PLANNING SYSTEM</p>
<p>Wards affected</p>	<p>ALL</p>
<p>Accountable member</p>	<p>Cllr Hugo Ashton – Executive Member for Planning Email: hugo.ashton@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Chris Hargraves – Head of Planning Email: chris.hargraves@westoxon.gov.uk</p>
<p>Report author</p>	<p>Chris Hargraves – Head of Planning Email: chris.hargraves@westoxon.gov.uk</p>
<p>Summary/Purpose</p>	<p>To consider the Council’s response to the Government’s consultation on proposed changes to the National Planning Policy Framework (NPPF) and other aspects of the planning system.</p>
<p>Annexes</p>	<p>Annex A – Suggested draft consultation response</p>
<p>Recommendation(s)</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> I. Note the content of the report and agree that the suggested draft consultation response attached at Annex A is submitted to Government.
<p>Corporate priorities</p>	<p>The proposed changes to the NPPF and other planning reforms cover a broad spectrum of issues that inter-relate with the following priorities in particular:</p> <ul style="list-style-type: none"> • Enabling a Good Quality of Life for All • Creating a Better Environment for People and Wildlife • Responding to the Climate and Ecological Emergency
<p>Key Decision</p>	<p>NO</p>
<p>Exempt</p>	<p>NO</p>

Consultees/ Consultation	This is a Government consultation on proposed changes to the National Planning Policy Framework (NPPF) and other aspects of the planning system. The Council's suggested draft response to the consultation is attached at Annex A.
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1. INTRODUCTION

- 1.1 The Government is consulting on a new draft version of the National Planning Policy Framework (NPPF – hereafter referred to as ‘the Framework’) alongside other proposed reforms to the planning system.
- 1.2 The purpose of this report is to provide an overview of the consultation, highlighting the most significant proposed changes that are likely to have implications for plan-making and decision-making in West Oxfordshire and to agree the Council’s response to the consultation.

2. WHAT IS BEING CONSULTED ON?

- 2.1 The consultation proposes some fundamental changes to national planning policy.
- 2.2 There are two main consultation documents – an overarching paper which explains the context and rationale for the proposed changes and a revised draft text version of the Framework itself.
- 2.3 There are 225 consultation questions in total. The majority of these relate to the proposed changes to the Framework, with the remainder focusing on other proposed changes relating to energy thresholds and data centres, viability and site thresholds.

3. BACKGROUND CONTEXT

- 3.1 The consultation paper provides useful context on the reason for the proposed changes, much of which relates to boosting housing delivery and economic growth, building on the changes already introduced by the Government in the previous December 2024 update of the Framework (e.g. increased mandatory housing targets etc.).
- 3.2 It also reflects the progress of the Planning and Infrastructure Bill which received Royal Assent on 18 December 2025 as well as the outcomes of various ‘working paper’ consultations previously carried out on issues such as brownfield passports.
- 3.3 In essence, what is now proposed is a fuller, more definitive update of national policy with the changes designed to make planning policy easier to use, underpin the development of faster and simpler local plans, and be more directive of decision-making.

4. SUMMARY OVERVIEW: SECTIONS 1 - 4

4.1 This section of the report provides a summary overview of the consultation, with a particular focus on the first four sections of the draft Framework, highlighting those aspects which are new and/or likely to be most impactful.

Overarching objectives

4.2 The consultation is based on three main objectives:

- To ensure national policy is accessible and understandable;
- To establish a suite of national policies on general planning matters (thereby avoiding the need for these to be repeated or deviated from in locally produced plans); and
- To introduce a more 'rules-based' approach to support timely and consistent planning, with a default 'yes' to development in suitable locations.

12 key policy changes

4.3 The consultation highlights twelve particularly substantive changes to the Framework. These are explained in more detail throughout this report and the suggested draft response at Annex A, but in summary include:

1. A permanent presumption in favour of suitably located development
2. Building homes around stations
3. Driving urban and suburban densification
4. Securing a diverse mix of homes
5. Supporting small and medium sites
6. Streamlining local standards
7. Boosting local and regional economies
8. Supporting critical and growth minerals
9. Embedding a vision-led approach to transport
10. Better addressing climate change
11. Conserving and enhancing the natural environment
12. Taking a more positive approach to the use of heritage assets

Overall Structure and Content

4.4 Changes are proposed to the overall structure and content of the Framework to improve clarity, useability and consistency.

4.5 In terms of structure, it retains the use of 'topic-based' chapters on issues such as housing, the economy and natural environment. These have however been re-ordered and put into more logical sub-headings and groupings.

4.6 Additional chapters are included on planning for energy and water and managing flood risk and coastal change. The draft Framework also incorporates policies relating to traveller sites which are currently set out in separate national planning policy.

4.7 A number of new annexes are proposed, primarily to import key aspects of separate Planning Practice Guidance where these are considered essential for the operability of the Framework's policies. This includes housing calculations and supply, the approach to Green Belt assessments and information requirements for planning applications.

Key Points to Note

4.8 The most significant update in terms of the overall structure and content of the Framework is the introduction of new national policies relating to 'plan-making' and 'decision-making'.

4.9 The 'plan-making' policies are intended to guide the preparation of Local Plans and must be taken into account by local authorities when drawing up those plans. They are not however to be used when making decisions on development proposals.

4.10 Whilst the emerging West Oxfordshire Local Plan 2043 will be examined under the December 2024 version of the Framework under transitional arrangements, the new plan-making policies provide a clear indication of the Government's intent and thus will be reflected on as Officers work up the Regulation 19 draft Local Plan later this year.

4.11 The 'decision-making' policies whilst non-statutory, will be a material consideration when applications are determined, alongside the local plan and any other material considerations. Importantly, the decision-making policies will carry weight from the date of publication of the new Framework and where existing Local Plan policies are inconsistent with them, the Local Plan policies will be given 'very limited weight'.

4.12 Officers are concerned about this approach and consider that a transitional period should apply to allow local authorities the time to update their Local Plans accordingly.

4.13 The consultation makes it clear that the new national decision-making policies should not be repeated in locally produced plans (Local Plans, Neighbourhood Plans etc.) the primary purpose of which in the future will be to focus on site-specific and locally-specific matters only.

4.14 Again, this raises some concern. Whilst it is accepted that Local Plans do not need to repeat national policy unnecessarily, removing their ability to cover the wide variety of issues addressed by the new national decision-making policies altogether is considered a step too far. This is reflected in the draft response attached at Annex A.

Chapter 1 - Introduction

4.15 The opening chapter of the draft Framework explains its role, provides practical information on how it should be used and sets out a high-level narrative on the purpose of the planning system. Whilst it helpfully reinforces the importance of having a plan-led system in place, as outlined above, Officers have concerns that too much of the current content of Local Plans is proposed to be stripped out and deferred to the new national decision-making policies and new Spatial Development Strategies (see Chapter 2 overview below).

Key Points to Note

- 4.16** Of note here is the proposed use of a simpler and more consistent approach to the ‘weighting’ of different considerations throughout the Framework. Members will be aware that the current version uses a number of different terms where weight is to be given to particular matters (e.g. great weight, significant weight, substantial weight etc.).
- 4.17** As these are not intended to imply any sort of hierarchy, it is instead proposed that the single term ‘substantial’ is instead used throughout. Officers are supportive of this proposed approach.

Chapter 2 – Plan-Making Policies

- 4.18** This chapter explains what the required parts of the development plan are. It then sets out plan-making policies which are intended to support the implementation of the new plan-making system, alongside new regulations and guidance. These are grouped under three main areas, ‘plan-making’, ‘preparing plans’ and ‘examining plans’ with a series of policies under each.

Key Points to Note

- 4.19** There are a number of important points to note here.
- 4.20** Firstly, the proposed, collective components of the ‘development plan’ which, going forward, will include:
- A Spatial Development Strategy (SDS) produced by strategic planning authorities;
 - A Local Plan produced by local planning authorities;
 - A Minerals and Waste Plan produced by a minerals and waste planning authority; and
 - A Policies Map, prepared and maintained by the local planning authority.
- 4.21** In addition, it may also include:
- Supplementary Plans, produced by local planning authorities, minerals and waste planning authorities and, where relevant, the Mayor of London; and
 - Neighbourhood Plans, produced by parish councils and neighbourhood forums.
- 4.22** The ‘new’ aspects here are the Spatial Development Strategy (SDS) and Supplementary Plans.
- 4.23** Strategic Development Strategies (SDSs) are intended to be strategic, high-level plans that will be prepared at the sub-regional level. Once adopted, they will form part of the development plan and will therefore be a material consideration for decision-making.
- 4.24** They should cover a period of at least 20 years, setting out a positive vision for future growth and change and providing a clear spatial framework for investment and growth, including new housing.
- 4.25** Importantly, the SDS will be expected to deal with the assessment of housing need and other uses and identify broad locations for strategic development (new settlements, major urban extensions etc.). They will need to be updated at least every 5 years.

- 4.26** Whilst Officers do not have concerns about the principle of sub-regional strategic planning, there are concerns around the ability of SDSs to determine future locations for major growth (new settlements, urban extensions etc.) even if this is done in a broad sense.
- 4.27** Whilst the SDS should consider overall housing and economic need and the broad spatial strategy for accommodating this, Officers consider that a Local Plan is the better tier of plan-making for determining specific growth locations. The same applies to the consideration of specific Green Belt boundaries.
- 4.28** The other ‘new’ aspect is the proposed level of ‘Supplementary Plan’ which is intended to focus on specific issues that are not addressed by other components of the development plan. This must be limited to locally specific design standards or situations where such a plan would allow the authority to respond positively and quickly to unanticipated changes in their area, where it is important to put in place policies to shape and direct development for a site or group of sites which the authority considers to be nearby to each other. This can include the allocation of sites for development, the expectation being that where Supplementary Plans allocate sites, these should be included in the next Local Plan unless changes in circumstances mean it is no longer relevant to do so.
- 4.29** Officers have no major concerns about the principle of producing Supplementary Plans – indeed they would likely be a useful complement to a Local Plan which may identify broader areas of development potential but then needs a further layer of policy to provide the necessary detail.
- 4.30** However, it is notable that such Supplementary Plans will be subject to a purposefully streamlined preparation, consultation and examination process, with the latter focused on legal compliance, consistency with national policy and whether the local authority has reached a ‘reasonable conclusion’ that the sites involved are nearby to each other.
- 4.31** There seems to be little, if any, consideration of the merits or ‘soundness’ of the plan, despite the fact that it may include specific site allocations. This is a significant departure from the current system whereby site allocations must be made through a Local Plan and subject to independent examination.
- 4.32** In terms of the remaining components of the development plan, much of this remains the same as the current system including the use of Local Plans, Minerals and Waste Plans and Neighbourhood Plans.
- 4.33** However, as outlined above, it is clear that the scope of such plans is to be ‘stripped back’ greatly so as to avoid any unnecessary repetition with the Framework, with the general principle that they should only include policies which extend beyond site or location-specific requirements where these are necessary and where plan makers consider there is a clear and justified reason for inclusion.
- 4.34** In addition to the issues summarised above, there are a number of other important points to note from the new plan-making section of the Framework.

- 4.35** In terms of co-operation between local authorities and other relevant partners, although the duty to co-operate is removed, plan-making authorities remain under an obligation to engage proactively and regularly with neighbouring authorities, infrastructure providers and other relevant bodies, demonstrating such engagement through the preparation of statements of common ground as appropriate.
- 4.36** This overall approach is supported by Officers along with the increased emphasis on a proportionate evidence base for plan-making, including the re-use of existing evidence wherever possible.
- 4.37** Of considerable concern, however, is the proposal to limit any quantitative standards set through development plan policies to infrastructure provision, affordable housing, parking and design and place-making. They should not cover matters which are already addressed by the Building Regulations other than in relation to accessibility standards and water efficiency.
- 4.38** This is a severe blow to West Oxfordshire's net zero carbon ambitions and is a major concern of Officers as reflected in the draft consultation response attached at Annex A.

Chapter 3 – Decision-Making Policies

- 4.39** This chapter includes a number of new policies focused on the issue of decision-making, as opposed to plan-making. The policies cover three main areas; the preparation of development proposals (by applicants) the determination of development proposals (by the local planning authority) and other routes to consent such as the use of development orders and the removal of permitted development rights through Article 4 directions.

Key Points to Note

- 4.40** Much of this section reflects the existing Framework including the need for local authorities to work pro-actively with applicants to find solutions, the amount of weight to be afforded to emerging local plans and the expectation that viability issues should be addressed at the plan-making stage and only dealt with at the planning application stage by exception.
- 4.41** There are however some important new aspects which are worth highlighting. These are briefly outlined below and reflected in the draft consultation response attached at Annex A.
- 4.42** In terms of pre-application engagement, the focus is on 'major' developments only, with any such engagement being proportionate to the nature of the scheme and those likely to be affected by it. Pre-application engagement for smaller non-major proposals will only be required in certain limited circumstances. This is a concern for Officers as the pre-application process is considered invaluable for all parties concerned, irrespective of the scale of development proposed.
- 4.43** In terms of the supporting information to be provided with planning applications, this is proposed to be much reduced. Major development proposals will require a concise planning statement with any further information required via local validation checklists, limited to that listed at Annex C of the Framework unless there is a policy in the development plan requiring a specific further assessment.

- 4.44** Again, this represents a concern for Officers. Whilst it is accepted that the amount of supporting information for a planning application should be kept to the minimum necessary, the proposals take this approach too far and could mean significant, strategic-scale developments having to be determined on the basis of insufficient information.
- 4.45** Furthermore, during the determination stage, local authorities should consult statutory or internal consultees only where it is necessary to do so. Importantly, decisions should not be delayed in order to secure advice from a statutory or internal consultee beyond their statutory deadlines, unless there is insufficient information to make the decision or more detailed advice may enable an approval rather than a refusal.
- 4.46** In terms of viability, there is an expectation that any viability assessment submitted in support of a development proposal (e.g. to justify a lower proportion of affordable housing) should utilise a number of standardised inputs which are to be appended to the Framework. whilst much of the text remains similar to the current framework – the most notable difference being the requirement for site-specific viability assessments to utilise standardised inputs, imported from the current viability planning practice guidance and updated accordingly. This approach is supported by Officers as it will help to ensure greater consistency of approach.
- 4.47** Other important changes in this section include increased clarity regarding the inter-relationship of the planning system with other regulatory regimes – the key point being that whilst matters which are controlled by other regimes may be a material planning consideration where they have land use implications, decision-makers should assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively. A good example of this in West Oxfordshire would be in relation to the water environment and the respective roles of the Environment Agency and Thames Water.
- 4.48** Finally, there is a notable shift of emphasis in relation to unauthorised development and enforcement, whereby if there is clear evidence that unauthorised development has taken place intentionally, this fact will be given substantial weight in the determination of any application for retrospective planning permission. This responds to long-standing concerns about the integrity of the planning system being undermined by retrospective permissions and is therefore welcome.

Chapter 4 – Achieving Sustainable Development

- 4.49** Chapter 4 includes a number of plan-making and decision-making policies focused on sustainable development.
- 4.50** In terms of plan-making, the policies largely reflect the current Framework, emphasising the importance of development plans meeting identified development needs (e.g. housing, employment, infrastructure) including any unmet needs that cannot be met within neighbouring areas. They also emphasise the importance of having in place a robust spatial strategy setting clear expectations for the location of development. The policies raise no particular concerns in this respect.

- 4.51** The decision-making policies introduce much more significant changes in relation to the presumption in favour of sustainable development, including the removal of the ‘tilted balance’ whereby in certain circumstances (e.g. lack of 5-year housing land supply) planning permission will generally be granted.
- 4.52** The approach taken is that as a matter of general principle, in all locations, development which accords with the development plan and with the decision-making policies of the Framework should be approved without delay.
- 4.53** Importantly, the Framework then makes a clear and purposeful distinction between development ‘within settlements’ and development ‘outside settlements’ which is a complete departure from the current version.
- 4.54** Within settlements, the expectation is that development will be approved unless the benefits would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework. Examples of such adverse effects include potential conflict with an allocated site or safeguarded land, loss of formal green space, wildlife habitats and cemeteries/burial grounds as well as more generally, conflict with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.
- 4.55** In terms of development outside of settlements, the draft Framework stipulates that only certain forms of development should be approved and that these should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework.
- 4.56** Examples of acceptable development include uses such as agriculture, horticulture and forestry, rural business including tourism, re-use of existing buildings, redevelopment of previously developed land, limited infilling, allocated sites etc.
- 4.57** Importantly, it includes housing or mixed-use development of an appropriate scale which would be within reasonable walking distance of, or physically well related to, a railway station or settlement within which a station is located.
- 4.58** It also includes development which would meet an evidenced unmet need such as where a local authority is unable to demonstrate a 5-year housing land supply, albeit with the caveat that the development must be well-related to an existing settlement would be of an appropriate scale or comprises major development for storage and distribution purposes.
- 4.59** Any other development proposals which do not fall within one of the categories set out above should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.

Key Points to Note

- 4.60** The changes introduced here are significant particularly the decision-making policies and whilst some aspects are supported by Officers, they also raise some concerns as set out in the draft consultation response at Annex A.
- 4.61** Of particular concern is the almost default ‘Yes’ to development taking place within settlement boundaries other than in a very limited number of circumstances cited in which the benefits of development are likely to be outweighed by adverse impacts. Whilst it is accepted that the circumstances listed are not intended to be exhaustive, the approach being proposed is likely to make it very difficult for local authorities to resist most forms of development within settlement boundaries, despite there being potentially significant and harmful impacts.
- 4.62** In terms of development outside of settlement boundaries, again there are some concerns here given that the list of acceptable forms of development is so extensive and includes circumstances in which a local authority cannot demonstrate a five-year housing land supply. Although various caveats are included (e.g. the need for development to be well-related to a settlement) the reality is that the approach taken is likely to ratchet up current development pressures in unsustainable greenfield locations.
- 4.63** Of particular concern is the fact that irrespective of location, the judgment on whether any adverse impacts of new development would substantially outweigh the benefits, will be made against the national decision-making policies in the Framework and not the Local Plan. Other than allocating sites, this brings into question the purpose of having a Local Plan in place at all and Officers consider that instead, any such judgment should be made having regard to both the new national decision-making policies and the Local Plan.

5. SUMMARY OVERVIEW: SECTIONS 5 – 20

- 5.1** Chapters 5 – 20 of the draft Framework comprise a series of topic-based sections much like the existing version, covering issues such as housing, the economy, town centres, natural and historic environment etc.
- 5.2** Climate change now has its own dedicated section and there are new sections relating to energy and water and flood risk.
- 5.3** In the interests of brevity, the proposed content of these topic-based sections is not summarised in detail below, but Officers have sought to pull out and identify those aspects which are completely new and/or likely to be most impactful in terms of both longer-term plan-making and decision-making.

Key Points to Note

- 5.4** From the outset, it is worth noting that Officers are supportive of much of what is being proposed within these topic-based sections. They are logically grouped and important issues such as climate change and the water environment have been given greater specific attention which is welcome.
- 5.5** Where Officers are supportive of the proposed changes, this is reflected in the positive responses attached at Annex A which are not repeated here. However, some of the proposed changes are considered to have a potentially harmful effect and those are highlighted below as well as being set out in more detail at Annex A.
- 5.6** The first key concern relates to climate change. There is one plan-making policy which outlines the overall approach to be taken when development plans are prepared. Whilst Officers have no concerns about what is included in this policy, concerns are raised in relation to what has been omitted – in particular the absence of any specific reference to local authorities being able to set their own standards for sustainable construction.
- 5.7** Whilst there is reference to the setting of local water efficiency standards, there is nothing on the use of low or zero carbon construction such as that which recently been approved by the Planning Inspectorate in relation to Salt Cross Garden Village. This is extremely disappointing and is reflected in the suggested draft response at Annex A. In particular, Officers have major concerns that the proposed approach will greatly inhibit the ability of the new West Oxfordshire Local Plan 2043 to roll out Salt Cross net zero carbon standards more widely, with the Council instead, effectively being bound by the Building Regulations only.
- 5.8** In terms of the provision of new homes, there is a clear, upward push on housing numbers with the draft Framework making it very clear that the standard method should be treated as a minimum and that development plan housing requirements should be set higher where appropriate, including situations where this is necessary to meet the needs of neighbouring areas, or where it reflects growth ambitions linked to economic development or infrastructure investment.
- 5.9** Members will be aware that at around 905 new homes per year, the standard method level of housing need for West Oxfordshire will already be extremely challenging to meet, irrespective of any further upward pressure relating to economic growth ambitions or infrastructure provision. The purposeful way in which it is expressed as an absolute minimum with a push for development plans to set higher housing requirements is therefore of concern.
- 5.10** A further notable shift in emphasis is the specific requirement for development plans to identify suitable locations for large scale development, such as new settlements, new urban quarters or significant extensions to existing settlements. Whilst this, in itself, does not present any major concerns, Officers are concerned that such locations will be identified through the new tier of high-level sub-regional Spatial Development Strategies (SDSs). Officers consider that whilst the SDS should deal with the overall quantum and broad

distribution of growth, decisions on individual sites/locations should remain at the Local Plan level.

- 5.11** With specific regard to residential standards, it should be noted that the draft Framework introduces a requirement for at least 40% of all new homes to be built to Building Regulations Part M4(2) standards relating to accessible and adaptable dwellings. Whilst this is an improvement over the current West Oxfordshire Local Plan 2031 which requires 25% on larger schemes of 50 or more units, it is disappointing as the Government have previously indicated an intention to require all new homes to be built to Part M4(2) standards.
- 5.12** In terms of affordable housing, the draft Framework builds on the current version in promoting a minimum proportion of social rent which is welcome and notably, in respect of military housing, effectively proposes that it is treated as a form of affordable housing in its own right and thus exempt from any local plan affordable housing mix requirements that would apply to market housing. There must however be a policy compliant quantum of military affordable homes. This approach is supported.
- 5.13** It is also notable that homes for travellers have been brought into the bracket of 'exception sites' such as rural exception sites and community-led development sites. Thus a rural exception site would not only be relevant to affordable housing needs but affordable traveller site needs too. Again, this is supported, as is the provision of helpful criteria to guide the location of traveller sites more generally.
- 5.14** In the interests of boosting housing supply, the draft Framework encourages the use of planning conditions to expedite development that has secured planning permission but not been delivered. This is also welcome as it will help to address long-standing concerns around the issue of unnecessary 'land banking' on the part of developers.
- 5.15** The draft Framework also stipulates that where development proposals are put forward on sites that have been identified for large-scale residential and mixed-use development in emerging local plans, that any such proposals should not be inconsistent with those emerging plans in order to better safeguard such development opportunities.
- 5.16** In terms of the economy, the proposed changes focus on further strengthening support for businesses and long-term economic growth. The changes aim to reflect changing business needs and the growth of different sectors, including data centres and freight and logistics.
- 5.17** Notably, there is a push for local authorities to avoid being overly prescriptive on acceptable uses, thereby providing a greater degree of flexibility.
- 5.18** A proposed new policy proposes that substantial weight should be given by the decision-maker to the economic benefits of proposals for commercial development - with particular references included to certain areas, e.g. supporting improvements in freight and logistics.
- 5.19** The approach to rural business is largely consolidated and re-ordered from the current Framework with no substantive changes or new policies proposed.

- 5.20** Much of the text around Town Centre vitality and viability remains the same or very similar to the current Framework including the core principle that ‘main town centre uses’ should be located within existing town centres wherever possible, with development outside these areas only considered when suitable sites are not available.
- 5.21** There is an increased emphasis on local plan policies reflecting clear strategies for town centres and identifying opportunities in this context and the proposed decision-making policies place greater emphasis on diversifying town centre uses to address the oversupply of retail floorspace and create opportunities for more residential accommodation.
- 5.22** Increased weight will be afforded to proposals that support town centre vitality and viability and protection and enhancement of community access to local shops.
- 5.23** In terms of communications infrastructure, much of the text is very similar to the current Framework but there is a notable shift towards the re-use of existing sites before new infrastructure is proposed on undeveloped sites which is welcome.
- 5.24** A new chapter on energy and water is proposed in recognition of their increasing importance in planning matters. The plan making policies emphasise the importance of early engagement with providers and making appropriate provision for necessary development as well as supporting the transition to clean power.
- 5.25** Decision making policies focus on the circumstances in which substantial weight should be given to renewable and low-carbon energy development and electricity network infrastructure and for water.
- 5.26** Notably, current Framework paragraph 169 is proposed to be modified, so that where renewable and low-carbon schemes come forward outside areas identified in the development plan, they should be assessed against the national decision-making policies as a whole, rather than the criteria used for identifying suitable areas in the development plan.
- 5.27** Officers are concerned that this will effectively circumvent the purpose of the Local Plan and is reflect in the draft response at Annex A.
- 5.28** In terms of the sustainable use of minerals, there are some notable policy shifts including a more restrictive approach to the extraction of coal, oil and gas and new policy on critical and growth minerals (essential, high-risk, or high-demand raw materials vital for modern technology, energy transition (EVs, wind turbines), and economic security).
- 5.29** The draft Framework also provides a more directive policy to prevent minerals sterilisation by ‘requiring’ prior extraction on sites allocated for non-mineral development which is welcome.
- 5.30** There are some significant proposed policy changes in relation to the efficient use of land including a stronger emphasis on allocating sites of all sizes (small, medium, large) and the setting of minimum density standards in plans including in relation to land around train stations with at least 50 dwellings per hectare to be achieved near ‘well-connected’ stations.

- 5.31** Substantive new support is provided for urban densification (e.g. mansard roofs, roofline infill, corner buildings, plot redevelopment) brownfield re-use and intensification.
- 5.32** In terms of the Green Belt, again there are some important policy shifts, building on the grey-belt concept already introduced under the 2024 version of the Framework. This includes Green Belt boundaries being altered in order to support development opportunities on land around suitable stations. The draft Framework also clarifies that spatial development strategies should assess the strategic role of the Green Belt and identify broad locations for further consideration, while local plans should undertake detailed assessments.
- 5.33** Importantly, there is a stronger emphasis on setting out positive expectations in development plans (e.g. beneficial uses such as nature recovery) which is welcome.
- 5.34** With regard to design and place-making, the draft Framework includes two plan-making policies and two decision-making policies. The plan-making policies establish a clear design strategy, setting expectations for design quality, identifying where codes, guides or masterplans are required, clarifying when design review applies, and ensuring the plan's vision delivers high-quality placemaking.
- 5.35** The two decision-making policies set out the key principles of well-designed places, giving substantial weight to design quality in determining applications and making clear that poorly designed development will be refused.
- 5.36** The draft Framework provides clearer wording on assessing proposals against national policy, local design policies, and design codes, and continues to give weight to outstanding or innovative designs.
- 5.37** For sustainable transport, the draft Framework builds on the Government's commitment to a 'vision-led' approach, embedding the role that transport infrastructure and choices can play in creating well-designed, sustainable, inclusive and popular places.
- 5.38** For plan-making, sustainable transport should be considered from the earliest stages so that it is reflected in the vision for the plan and its specific proposals, and forms an integral part of a plan's strategy. Local Plans should also set local parking standards across the plan area or for specific areas, with a more permissive approach now adopted towards the use of maximum parking standards, the use of which under the current Framework, requires clear and compelling justification. This is welcome.
- 5.39** The decision-making policies address the location of development, street design, access and parking, roadside facilities, transport impact assessment, proposals for ports and aviation facilities, and effects on public rights of way.
- 5.40** Section 16 of the draft Framework relates to the promotion of Healthy Communities. The plan-making policies require development plans to be based on healthy place-shaping principles, including setting open space standards, allocating land for community facilities, and identifying local green spaces.

- 5.41** The decision-making policies seek to ensure new development is supported by appropriate community facilities and infrastructure, give substantial weight to proposals that enhance them, and address hot food takeaways, loss of key facilities, impacts on recreation space, and development affecting local green space.
- 5.42** Officers are generally supportive of the changes proposed – in particular the increased clarity on how development plans should assess and make provision for community facilities and public service infrastructure including the setting of specific quantitative standards for the provision of outdoor recreational land.
- 5.43** Greater community engagement in relation to the design of play facilities is also welcome along with the additional clarity provided on the loss of community facilities. Officers are however concerned that the approach proposed would only apply to facilities which are the last of their type in the locality which would still see a likely dwindling of local service provision in rural areas.
- 5.44** The draft Framework includes a dedicated section on pollution, public protection and security. The plan-making policy sets out key considerations for identifying sites and managing risks from ground instability, contamination and other hazards whilst the decision-making policies address ground conditions, pollution and living conditions, protect existing lawful activities from undue constraint and safeguard public safety, security and land used for defence and public protection.
- 5.45** It includes explicit reference to daylight and sunlight, as common and important planning considerations, and adds specific provisions on air pollution, noise exposure, artificial light and water quality.
- 5.46** Chapter 18 comprises a dedicated section on flood risk and coastal change. Most of the content reflects pre-existing policy in chapter 14 of the current Framework, although changes are also proposed to reflect recent updates to Planning Practice Guidance, and to strengthen policy on coastal risks and protection, ensuring development is safe from flooding, the use of sustainable drainage systems and development in coastal change management areas.
- 5.47** The wording has been updated to make clear the importance of considering both current and future flood risk (rather than referring less directly to the effects of changing climate), and to be clear about the consequences which should be considered. This is welcome.
- 5.48** The draft Framework also introduces a new requirement for Sustainable Drainage Systems to be designed in accordance with the National Standards for Sustainable Drainage Systems to provide a consistent basis for improving their design. Again, this is supported in principle.
- 5.49** A further change introduces a new policy to avoid the enclosure of watercourses and encourage the de-culverting and re-naturalising of river channels.
- 5.50** The penultimate section of the draft Framework relates to the natural environment and includes one plan-making policy and five decision-making policies focused on conserving and enhancing the natural environment, driving nature recovery and embedding natural capital considerations within sustainable growth.

- 5.51** In terms of plan-making, the policy strengthens expectations that development plans must safeguard and enhance landscapes, habitats, waterbodies and species, informed by evidence including Local Nature Recovery Strategies, River Basin Management Plans, Protected Landscape Management Plans and other relevant strategies. Plans are expected to identify a clear hierarchy of environmental assets and steer development towards land of least environmental value, consistent with other Framework policies.
- 5.52** The draft introduces a stronger emphasis on green infrastructure (GI), requiring plans to set clear GI standards drawing on national benchmarks. It also anticipates Environmental Delivery Plans and clarifies protection for locally designated sites, addressing a gap in the current Framework.
- 5.53** Importantly, the draft limits the circumstances in which local plans may set biodiversity net gain (BNG) requirements above the statutory 10% minimum. Higher local standards may only be applied to specific allocations and must be fully justified and deliverable.
- 5.54** The decision-making policies require development to contribute positively to the natural environment, retain and enhance trees, and respond to landscape character and existing natural features. A new requirement for swift bricks in developments is proposed to be introduced.
- 5.55** For protected landscapes such as the Cotswolds National Landscape, the term “substantial weight” replaces “great weight” for consistency across the Framework. The exceptional circumstances test for major development remains, with additional emphasis on mitigation that respects the special qualities of these landscapes and the use of compensation where harm cannot be mitigated.
- 5.56** Additional policies address coastal character and development affecting areas important for biodiversity, with clearer and more comprehensive expectations for environmental enhancement.
- 5.57** The overall direction of travel is supported, particularly the stronger emphasis on nature recovery, green infrastructure and clearer protection for locally designated sites. However, the restriction on setting local BNG standards above the statutory requirement would limit local flexibility, particularly in areas with significant ecological constraints or ambitions exceeding the national baseline.
- 5.58** The requirement to set clear GI standards has resource implications and is likely to require further evidence and viability testing at plan-making stage. Finally, whilst the terminology shift from ‘great weight’ to ‘substantial weight’ is intended to improve consistency, there may be uncertainty as to whether this alters the level of protection afforded in practice, particularly in protected landscapes.
- 5.59** The final chapter – Chapter 20 – includes three plan-making policies and eight decision-making policies relating to the conservation and enhancement of the historic environment.

- 5.60** The plan-making policies require development plans to take a proportionate and evidence-based approach to the historic environment, including the preparation and use of historic environment records (HERs) and the identification of non-designated heritage assets through local lists.
- 5.61** Plans must set out clear strategies for conserving and enhancing Conservation Areas and World Heritage Sites (WHS), including any locally specific policies needed to protect their significance, Outstanding Universal Value and settings. A new expectation is introduced that Conservation Areas are periodically reviewed and supported by adopted appraisals and management plans.
- 5.62** The decision-making policies retain the core principle that heritage assets should be conserved and enhanced in a manner appropriate to their significance. Substantial weight must be given to the conservation of designated heritage assets, irrespective of the degree of harm identified.
- 5.63** The draft provides clearer and more structured policy for proposals affecting World Heritage Sites, conservation areas and archaeological assets. It separates WHS policy from Conservation Area policy and expands guidance on assessing impacts on character and appearance. This is of course of direct relevance to West Oxfordshire and the Blenheim Palace WHS.
- 5.64** The redraft seeks to clarify and simplify decision-making, including explicit support for proposals that deliver positive impacts, such as bringing vacant or underused heritage assets back into use or improving energy efficiency. The concept of ‘optimum viable use’ has been removed, allowing greater flexibility where harm is less than substantial.
- 5.65** Greater clarity is also provided for proposals affecting non-designated heritage assets, including clearer balancing tests and explicit recognition of positive effects. Expanded guidance addresses investigation, recording and preservation of archaeological assets where harm cannot be avoided.
- 5.66** The attempt to simplify and clarify heritage decision-making is welcomed, particularly given the complexity and frequency of legal challenge under the current Framework. The stronger positive framing, including explicit support for reuse and energy efficiency improvements, may assist in bringing vacant or underused heritage assets back into productive use.
- 5.67** However, the removal of ‘optimum viable use’ may create uncertainty in how viability arguments are considered in cases involving less than substantial harm. As with Chapter 19, the shift from ‘great weight’ to ‘substantial weight’ may also prompt debate as to whether the level of protection has been materially altered.
- 5.68** The requirement for periodic review of Conservation Areas and preparation of management plans will have resource implications for local authorities.

6. OTHER PROPOSED REFORMS

- 6.1 Alongside the proposed revisions to the NPPF, the consultation seeks views on a number of wider reforms aimed at accelerating delivery, improving certainty and reducing complexity within the planning system.

AI Data Centres and Energy Infrastructure

- 6.2 The consultation proposes increased flexibility in the consenting regime for AI data centres, including allowing developers greater choice between the Town and Country Planning Act (TCPA) system and the Nationally Significant Infrastructure Projects (NSIP) regime under the Planning Act 2008.
- 6.3 Views are sought on enabling joint consenting of data centres and co-located energy generation (such as on-site renewables) under a single regime, and on whether new Secretary of State powers to direct or redirect projects into or out of the NSIP regime provide sufficient flexibility.
- 6.4 The consultation also considers whether thresholds for renewable energy projects co-located with data centres should be raised, enabling more schemes to remain within the local planning system and potentially speeding up decisions.
- 6.5 These proposals signal a strong pro-growth and streamlining agenda but Officers are concerned that they will reduce local control over large-scale energy and digital infrastructure projects.

Viability Reform

- 6.6 The consultation proposes incorporating updated standardised viability inputs into the Framework (with supporting detail remaining in Planning Practice Guidance) to improve consistency and reduce negotiation at application stage.
- 6.7 Views are sought on introducing “growth testing” for large phased schemes, refining guidance on developer returns (including whether the current 15–20% GDV range should be tightened or differentiated by risk profile), and expanding guidance on alternative return metrics.
- 6.8 Proposals also seek clearer guidance on benchmark land values, including circumstances where a landowner premium may not be justified and when alternative use value should not be relied upon. The use of residual land value cross-checks is also under consideration.
- 6.9 These reforms aim to increase transparency and reduce viability disputes, but may have implications for land values, scheme deliverability and negotiations over affordable housing.

Reforming Site Thresholds

- 6.10 A new ‘medium development’ category is proposed, defined as schemes of 10 - 49 dwellings on sites up to 2.5 hectares, intended to better support SME housebuilders. Targeted planning easements are proposed for medium sites, including proportionate information requirements, potential use of commuted sums, standardised Section 106 templates, and possible extension of Permission in Principle (PiP).

- 6.11 The consultation also seeks views on extending the small-site exemption from the Building Safety Levy to medium sites and on how medium sites should be treated under related regimes such as biodiversity net gain and planning committee referral thresholds.
- 6.12 Concerns are acknowledged regarding potential 'gaming', such as subdivision of larger sites to benefit from easements, and views are sought on mitigation measures.
- 6.13 Overall, while aimed at supporting SME delivery and speeding up decisions, Officers have some concerns that these proposals could create complexity around thresholds and a risk of unintended consequences.

7. NEXT STEPS

- 7.1 Subject to the approval of the Executive, the draft consultation response attached at Annex A will be submitted to Government. It is anticipated that a final version of the Framework will be issued in the summer.

8. ALTERNATIVE OPTIONS

- 8.1 The District Council could choose not to respond to the consultation or to submit different responses to those set out at Annex A. Not submitting would deprive the Council of the opportunity to make its views known on fundamental proposed changes to national policy.
- 8.2 Similarly, although different responses to those attached at Annex A could be submitted, Officers consider that the responses as drafted highlight particular areas of concern whilst remaining largely supportive of the changes proposed.

9. FINANCIAL IMPLICATIONS

- 9.1 The report raises no direct financial implications. Indirectly, there may be a reduced cost associated with local plan preparation as the emphasis is on less, more proportionate evidence and re-using existing evidence where possible.

10. LEGAL IMPLICATIONS

- 10.1 The report raises no direct legal implications.

11. RISK ASSESSMENT

- 11.1 The report raises no significant risks.
- 11.2 Although the emerging West Oxfordshire Local Plan 2043 will be examined under the current December 2024 version of the Framework, there is a degree of indirect risk that some of the aspects of the new Framework (e.g. preventing local authorities from being able to exceed building regulations relating to sustainable construction) could make it more difficult for the Council to justify its approach on certain matters at examination.
- 11.3 There is also a risk that, once adopted, some of the new Local Plan policies effectively become out of date and superseded by the new Framework where they are not fully aligned.

11.4 In the longer-term, there is a risk of further upward pushes to overall housing requirements beyond the minimum level of housing need identified through the standard method.

12. EQUALITIES IMPACT

12.1 Views on the potential impacts of the proposed changes are being sought by the Government as part of the consultation.

13. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

13.1 As outlined in the report and attached Annex, there are a number of proposed changes which relate to the climate and ecological emergencies. Where concerns have been identified, these are reflected in the responses provided at Annex A.

14. BACKGROUND PAPERS

14.1 None.

1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

West Oxfordshire District Council has a number of concerns regarding the introduction of statutory National Development Management Policies (NDMPs).

The Council considers that NDMPs should remain non-statutory unless and until there is clear and compelling evidence that the current approach is ineffective or giving rise to significant unintended consequences. At present, it has not been demonstrated that elevating such policies to statutory status is necessary to achieve the Government's stated objectives.

The Council is concerned that making NDMPs statutory could reduce local flexibility and undermine the ability of local planning authorities to respond to locally specific circumstances, which is a fundamental principle of the plan-led system. Any shift in status would need to be clearly justified and proportionate.

This position should be kept under review as further evidence becomes available.

Should a future decision be taken to proceed with statutory NDMPs, it would be essential to introduce appropriate transitional arrangements. These would need to allow local planning authorities sufficient time to review and, where necessary, amend their development plans, update internal processes, and adjust decision-making procedures to ensure clarity, consistency and legal robustness.

2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council partly agrees with the proposed new format and structure of the draft Framework, comprising separate plan-making policies and national decision-making policies.

Officers have found the draft text clear and relatively easy to follow, both in terms of its plan-making and decision-making components. The separation of policies in this way provides greater clarity regarding their intended purpose and application.

In particular, the plan-making policies are helpful in guiding the content and preparation of development plans and are therefore welcomed.

The Council recognises that the decision-making policies are, in principle, helpful in providing national consistency. However, as outlined in response to Question 1, the Council does not support these policies becoming statutory in the absence of clear evidence that such an approach is necessary.

The Council also has residual concerns regarding the lack of transitional arrangements for the decision-making policies, which are proposed to take effect immediately upon publication of the final Framework. This approach risks rendering certain adopted local plan policies - including relatively recently adopted policies - out of date or subject to significantly reduced weight in decision-making.

Such an outcome would undermine plan-led decision-making and create uncertainty for local authorities, applicants and communities.

More appropriate transitional arrangements should therefore be put in place to allow local planning authorities sufficient time to review and align their development plans with the revised Framework in an orderly and plan-led manner.

Additionally, the Council considers that the natural environment chapter (Chapter 19) should be given higher prominence in the Framework, particularly in relation to the dual crises of climate and nature. While climate is addressed in Chapter 5, the natural environment chapter is currently presented much later in the document, which underplays the intrinsic link between the two.

The draft NPPF fails to adequately recognise this fundamental relationship, and giving the natural environment greater prominence would better reflect the urgency and interconnected nature of environmental and climate challenges.

3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council broadly welcomes the proposed set of annexes to be incorporated into the draft Framework.

The Council supports the inclusion of additional guidance within the Framework itself, particularly where this consolidates information that is currently contained within separate Planning Practice Guidance. Bringing relevant material together in a single document should improve clarity, accessibility and usability for plan-makers, decision-makers and applicants.

The Council also strongly supports the principle of standardised viability inputs. A more consistent and transparent approach to viability assessment will assist in improving certainty for all parties, reduce disputes, and streamline the plan-making and decision-making processes.

However, the Council has concerns regarding certain specific annexes.

In particular, the annex relating to implementation raises concerns due to the absence of meaningful transitional arrangements for the proposed decision-making policies. As noted in response to earlier questions, the immediate application of such policies risks undermining recently adopted development plan documents and creating uncertainty in decision-making. This is especially problematic where significant resources have recently been committed to plan preparation in accordance with national policy in force at the time.

The Council is also concerned about the proposed superseding of the Written Ministerial Statement Planning – Local Energy Efficiency Standards Update (13 December 2023), which has directly informed the very recently adopted Salt Cross Area Action Plan. The removal or dilution of this policy basis risks creating uncertainty and undermining locally justified and examined policy approaches.

Finally, the Council considers that the level of information proposed to be required in support of planning applications is insufficient. Officers are concerned that the reduced evidential requirements could hamper the ability of local planning authorities to robustly scrutinise applications and make well-informed, legally sound decisions. Ensuring proportionate but adequate supporting information is critical to maintaining confidence in the planning process.

In summary, while the inclusion of the annexes is welcomed in principle, further refinement is required to address these specific concerns.

4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council agrees with the proposal to incorporate Planning Policy for Traveller Sites within the draft Framework.

The Council supports the principle of consolidating national planning policy into a single, comprehensive document. There appears to be limited justification for maintaining a separate policy document when its content can be seamlessly integrated within the Framework.

Incorporation would improve clarity, accessibility and ease of reference for plan-makers, decision-makers, applicants and communities.

The proposed update to the Framework provides an appropriate and timely opportunity to rationalise national policy in this way.

5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council supports, in principle, the proposed simplification of terminology within the Framework where weight is intended to be applied.

A more consistent approach to the use of terminology should assist plan-makers, decision-makers and applicants in understanding national policy expectations and may help to reduce ambiguity and unnecessary debate regarding the interpretation of different expressions of weight. The intention to avoid implying an unintended hierarchy between terms such as “great”, “significant” and “substantial” is understood and welcomed.

However, the Council considers that care will be needed to ensure that the term “substantial” is applied consistently and does not inadvertently alter the meaning or strength of existing policy expectations. In some contexts, the term has an established meaning through case law and appeal decisions, and any shift in wording should not create uncertainty or unintended consequences.

Subject to these caveats, the Council supports the principle of simplifying and standardising terminology in the interests of clarity and consistency.

6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council partly agrees with the proposed role, purpose and content of Spatial Development Strategies (SDSs) as set out in draft Policy PM1.

In principle, the Council supports the introduction of sub-regional planning through SDSs. A strategic framework at this scale has the potential to provide greater clarity and certainty in addressing cross-boundary matters such as housing provision, economic growth, strategic infrastructure and nature recovery.

Done effectively, SDSs could strengthen alignment between authorities and ensure that strategic priorities are considered comprehensively and consistently across functional geographies.

WODC also supports the broad scope and indicative content of SDSs set out in draft Policy PM1. The proposed focus on strategic-scale issues and the establishment of an overarching spatial framework is appropriate to the intended purpose of these documents.

However, the Council has concerns regarding the suggestion that SDSs should identify broad locations for strategic development, including new settlements and urban extensions.

While an agreed sub-regional spatial strategy should establish the overall distribution and scale of growth, the identification of specific broad locations for development should remain the responsibility of Local Plans.

Local planning authorities are best placed to assess site-specific constraints, infrastructure capacity, environmental considerations and community impacts in detail.

Allowing SDSs to define broad development locations risks blurring the distinction between strategic and local plan-making functions and could undermine the role of Local Plans.

WODC therefore supports the principle of SDSs and their strategic scope but considers that the identification of broad development locations should be clearly positioned as a matter for Local Plans, prepared within the context of an agreed sub-regional strategy.

Furthermore, the Council considers that Policy PM1 should explicitly reference Local Nature Recovery Strategies (LNRS). LNRS provide a spatially represented priority network of habitats and opportunity areas for nature recovery, which is directly relevant to strategic planning. Spatial Development Strategies should therefore be required to have regard to LNRS to ensure that strategic planning decisions actively support nature recovery, complement climate action, and integrate environmental priorities into the spatial framework from the outset.

7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?

West Oxfordshire District Council supports in principle the requirement to review Spatial Development Strategies (SDSs) at least every five years. Given their strategic role in shaping the distribution of growth and investment across a sub-region, it is essential that SDSs remain up to date, evidence-based and responsive to changing circumstances. A regular review cycle will help ensure continued alignment with national policy, infrastructure planning, and the most recent demographic and economic evidence.

However, the Council considers that the need to review or alter an SDS should not be framed solely around changes to housing need or housing requirements. While housing is a central component of any spatial strategy, SDSs are intended to address a broader range of strategic matters.

There may be other significant factors that justify a full or partial review, including changes in economic or employment growth projections, major infrastructure or investment decisions, shifts in environmental or climate policy, updates to transport strategies, or other unforeseen circumstances that materially affect the spatial strategy. Political or governance changes at sub-regional level may also necessitate review.

Accordingly, while WODC strongly supports the principle of reviewing SDSs at least every five years, the framework should allow flexibility for earlier or more fundamental review where wider strategic considerations - not solely housing need - indicate that this is necessary.

8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need?
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

In short, SDSs should be updated at least every 5-years and so this question should become a moot point. However, if there are valid reasons as to why this has not been possible in exceptional circumstances, then it would seem appropriate to allow agreed housing requirement figures to be used for the purposes of calculating housing land supply beyond the 5-year period, provided there is no significant change in levels of identified housing across the SDS area.

It would be helpful if the Framework could potentially quantify what might be considered to represent a significant change in the level of housing need (e.g. +/- 10%).

9) Do you agree with the role, purpose and content of local plans set out in policy PM2?
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council partly agrees with the proposed role, purpose and content of Local Plans as set out in draft Policy PM2.

The Council supports many aspects of the draft policy, including the requirement for Local Plans to set out a clear vision and framework for future development, to meet identified development needs, and to allocate sufficient land - including broad locations for growth - to deliver the strategy. We also support the proposed emphasis on timely plan preparation and the general approach to processes and procedures, which should help ensure plans are kept up to date and effective.

We remain of the view that the identification of larger strategic locations for growth - such as new settlements and urban extensions should remain the responsibility of Local Plans, albeit within the context of an agreed sub-regional Spatial Development Strategy (SDS).

While SDSs should establish the broad distribution and scale of growth, Local Plans are best placed to undertake the detailed assessment of constraints, infrastructure requirements, environmental impacts and community considerations necessary to identify and allocate specific strategic sites.

The Council also has concerns regarding the proposed ‘narrowing’ of Local Plan content, particularly the suggestion that plans should focus primarily on the delivery of allocated sites and avoid any unnecessary repetition of national decision-making policies. Whilst WODC agrees in principle that duplication of national policy should be avoided, we do not support an approach that limits Local Plans solely to site-specific matters.

Local Plans play an important role in shaping how development responds to local character, environmental constraints, design expectations, infrastructure priorities and other locally specific considerations. Topic-based policies provide clarity for decision-makers, applicants and communities, and ensure that national policy is interpreted and applied in a way that reflects local circumstances. Removing or overly constraining this function risks weakening the plan-led system and reducing transparency.

The same principle applies to neighbourhood plans, many of which focus on locally distinctive policies and development management considerations rather than site allocations. It is important that the reformed framework continues to support this broader role.

Furthermore, the Council notes that the draft Policy PM2 makes limited, if any, reference to the relationship between Local Plans and Local Nature Recovery Strategies (LNRS). This is a concern given the legal duty for local planning authorities to “have regard” to LNRS as part of the planning process, including in the preparation of Local Plans. Explicitly referencing LNRS within Policy PM2 would ensure that Local Plans appropriately integrate spatially represented priorities for habitats and nature recovery, supporting environmental objectives alongside strategic and local development needs.

In summary, while WODC supports the overall direction of draft Policy PM2 and many of its specific provisions, we consider that Local Plans must retain a broader policy-making function beyond the allocation and delivery of specific sites and PM2 must explicitly reflect statutory duties in relation to LNRS to ensure effective, plan-led, and environmentally informed decision-making.

10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No

Yes

a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.

N/a

11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Whilst the Council agrees in principle that unnecessary repetition of national policy should be avoided, we are concerned that the proposed approach goes significantly further and would unduly restrict the scope and function of Local Plans. As currently framed, the policy risks limiting Local Plans to a narrow focus on site allocation and delivery, reducing their ability to include topic-based policies that reflect local priorities and circumstances.

Local Plans play a critical role in interpreting and applying national policy at the local level. National policy is, by necessity, high-level and generic. Local Plans provide the spatial expression of that policy, ensuring that it is tailored to local environmental constraints, character, infrastructure capacity, design expectations, climate priorities and other locally specific considerations. This is not duplication for its own sake, it is essential to delivering a genuinely plan-led system.

Restricting Local Plans from elaborating on national policy - even where doing so provides clarity, certainty and local specificity - risks creating ambiguity in decision-making and weakening the role of the development plan. It may also lead to greater reliance on case-by-case interpretation, reducing transparency for communities and applicants alike.

The same concern applies to neighbourhood plans, many of which focus on locally distinctive development management policies rather than site allocations. An overly narrow interpretation of “duplication” could undermine their effectiveness and community confidence in the planning system.

For these reasons, WODC strongly disagrees with the proposed approach in Policy PM6(1c). Local Plans must retain the ability to include locally specific topic-based policies provided these build upon or provide additional clarity to national policy, in order to ensure robust, transparent and locally responsive decision-making.

12) Do you agree with the approach to initiating plan-making in PM7? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree

The proposed approach is supported – particularly the increased emphasis placed on robust project management and effective and regular engagement with key stakeholders.

13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council strongly supports the proposed approach, in particular the emphasis placed on the use of other existing evidence, shared working and the use of standardised tools and inputs wherever possible. All of this will help to achieve efficiency and resource savings and help contribute to a more streamlined examination process.

14) Do you agree with the approach to identifying land for development in PM9? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council notes that PM9 sets out a clear and structured approach for assessing and selecting sites for development. However, the policy does not specifically reference Local Nature Recovery Strategies (LNRS) or the opportunities to incorporate environmental priorities when identifying land.

Explicit consideration of LNRS would ensure that development plans can proactively identify land for green infrastructure, nature parks, or other forms of accessible green space, supporting nature recovery alongside housing and economic growth. Integrating these considerations at the site identification stage would help ensure that environmental objectives are delivered in a transparent, consistent, and plan-led manner.

15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strong agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council supports the removal of the Duty to Co-Operate and considers that the approach set out in relation to cross-boundary co-operation in the draft Framework is pragmatic and sensible.

It would however be helpful if the text of the Framework (e.g. under Policy PM11) could make it clearer that any concerns regarding a lack of effective co-operation and alignment between local authorities and/or other relevant partners is a matter of soundness that will be capable of being remedied through a local plan examination as opposed to the 'do not pass go' type approach adopted under the previous Duty to Co-Operate.

16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Whilst Policy PM12 is supported in principle in terms of its intended scope and purpose, as currently worded, it does not provide a great deal of additional clarity or certainty over and above the wording of the current Framework.

The only specific form of provision/contribution mentioned is affordable housing and whilst clearly important, it would be helpful if the policy could be expanded to include mention of other forms of infrastructure – particularly those of strategic significance.

Whilst it is clearly a matter for individual development plans to identify what developer contributions are likely to be sought alongside continued development viability, it would be helpful if the policy wording could be expanded beyond affordable housing only.

17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

a) Please provide your reasons, particularly if you disagree.

Whilst we can see some merit in this being addressed through individual development plans, the circumstances in which development contributions are proposed to be reduced, will often be very similar nationally and we see no reason why this issue could not be robustly addressed within the Framework itself. This could be within the body of the Framework itself or as part of an expanded version of the draft Annex on standardised viability inputs.

In particular, it would provide a helpful opportunity to make it clear that any cost incurred in revisiting the viability of development in light of developer contributions being sought, should, at the planning application stage, be borne by the developer/applicant rather than local planning authorities – with the LPA cost having been incurred at the plan-making stage via a proportionate whole plan viability assessment.

18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council strongly disagrees with draft Policy PM13 and, in particular, the proposal to commence section 43 of the Deregulation Act 2015 so as to limit the ability of local planning authorities to set local standards relating to energy efficiency.

The effect of this proposal would be to significantly constrain the ability of authorities to respond to locally evidenced priorities - most notably in relation to energy efficiency and net zero carbon development. Restricting local standards to matters of accessibility and water efficiency represents a substantial and regressive step at a time when local authorities are playing a critical role in responding to the climate emergency.

West Oxfordshire District Council formally adopted the Salt Cross Area Action Plan on 25 February 2026 following extensive evidence gathering, viability testing and independent examination. The appointed Inspector concluded that the Council's approach towards its net zero carbon policy was legally compliant and consistent with national policy when considered in the round. The plan has therefore been found sound and deliverable through an independent statutory process.

The proposed changes would, upon publication of the revised Framework, place at risk the implementation of the Salt Cross net zero carbon policy - a policy the Council has worked towards for five years, supported by robust local evidence and examination. This will inevitably weaken confidence in the plan-led system and risk delaying or diluting the delivery of an exemplar garden community.

More broadly, removing the ability of local planning authorities to set locally justified energy efficiency standards would hamstring councils' capacity to respond proportionately to local climate ambitions, viability evidence and community expectations. It would also create tension between national objectives on decarbonisation and the practical tools available to local authorities to help achieve them.

However, the Council welcomes, in principle, the use of Green Infrastructure Standards. These standards provide a clear and consistent framework to support high-quality, multifunctional green infrastructure, enhancing biodiversity, climate resilience, and the wellbeing of local communities. Where appropriately applied, they can complement other local planning standards without undermining energy efficiency ambitions.

For these reasons, WODC strongly disagrees with Policy PM13 and the commencement of section 43 of the Deregulation Act 2015. Local planning authorities must retain the ability to set locally evidenced standards - particularly in relation to energy performance - where these have been demonstrated to be viable, deliverable and subject to independent examination as has been the case with Salt Cross Garden Village.

19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?

The proposed tests of soundness relating to SDSs are supported in principle, although we would observe that the test regarding 'effectiveness' is very 'wordy' and not particularly clear. Some re-drafting here would assist.

We welcome the clarity provided that examiners will be able to suggest modifications to enable a strategy to be found to be sound along with the pragmatism to be applied in situations where there may be some uncertainties towards the end of the plan period (e.g. around infrastructure provision).

With regard to the Local Plan tests of soundness, we have no major concerns although would observe that the test of 'realism' could be construed as rather subjective. What is meant by a realistic policy? Reverting to 'effective' with reference to cross-boundary working on strategic matters may be more appropriate.

We also note that as currently drafted, the text suggests that Local Plan examiners will not consider whether any relevant procedural requirements have been met (unlike for SDSs). This is presumably not the case and should be corrected.

The text could also usefully be expanded to include the same references set out under Policy PM 14 relating to potential uncertainties later in the plan period and the ability of examiners to recommend main modifications to achieve a sound plan. Otherwise, as drafted, it could be taken that Local Plan examiners will not recommend modifications and will expect absolute certainty over a full 15-year period, which, again, is presumably not intended to be the case.

20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?

Overall, the proposals in the plan-making are supported in principle, but West Oxfordshire District Council has strong concerns regarding the following key aspects:

- Over-centralisation of decision-making policy
- Concern that statutory national policies could displace locally specific policy interpretation.
- Risk of increased uncertainty and reduced transparency.
- Blurring of roles between SDSs and Local Plans
- Spatial Development Strategies identifying broad locations for development (e.g. new settlements, urban extensions). Strategic distribution should sit with SDSs, but site identification should remain with Local Plans.
- Overly narrow scope for Local Plans with a concern that Local Plans are being reduced to site allocation/delivery documents.
- Risk of weakening the broader policy-making role of Local Plans and neighbourhood plans.
- Unclear triggers for SDS review. Reviews should not be based solely on housing need changes. Other triggers (economic shifts, infrastructure investment, environmental factors, governance changes) must be recognised.
- Insufficient transitional provisions with risk to recently adopted plans prepared in accordance with existing policy.
- Specific impact on Salt Cross and local energy standards
- Tests of soundness drafting issues. Some wording (e.g. “effectiveness” and “realism”) unclear or potentially subjective.
- Inconsistency between SDS and Local Plan examination provisions.

21) Do you agree with the principles set out in policy DM1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

a) Please provide your reasons, particularly if you disagree.

In terms of proposals for major development, the Council is supportive of the emphasis placed on early engagement with relevant parties including proportionate pre-application engagement. Also supported is the requirement for a clear and concise planning statement.

However, as drafted Policy DM1 suggests that the planning statement is the only information needed to support the submission of a planning application for major development which is presumably not intended to be the case and seems to run counter to the information requirements outlined at new Annex C.

There should be a read-across to other relevant decision-making policies and their associated information requirements.

In terms of other 'non-major' development proposals, we have significant concerns about the emphasis proposed to be placed on the 'minimum necessary' information requirements to enable a decision to be made.

22) Do you agree with the policy DM2 on information requirements for planning applications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Whilst we are supportive of the principle of removing an unnecessary proliferation of supporting information for smaller development proposals, the shift in emphasis towards a 'bare minimum' type approach is too significant and runs the risk of development proposals being put forward in the absence of sufficient information upon which to make a robust and informed planning decision.

Furthermore, whilst we support the principle of greater national consistency in local validation checklists, restricting any additional local requirements beyond those set out at Annex C to only those matters which are specified in development plan policies is considered a step too far.

We do however support the principle of proportionality and making it clear what information will be required in support of major, medium and other types of development.

23) Do you have any views on whether such a policy could be better implemented through regulations?

No specific view.

24) Do you agree with the principles set out in DM3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council is generally supportive of the general principles outlined in Policy DM3, much of which reflects actions that many local planning authorities already take, including positive working with applicants and making effective use of pre-application discussions.

We do, however, have concerns around bullet point d), which effectively seeks to minimise the role of statutory or internal consultees. Whilst we fully accept that any such consultation should

be proportionate to the nature of the scheme proposed, as worded, the text downplays the importance of their input to too great an extent.

In some instances, there will be perfectly valid reasons why a consultee response may be received late and, whilst any delays are to be avoided wherever possible, they should not in themselves be seen as a reason to proceed regardless.

We are particularly concerned about changing the process for obtaining statutory and internal consultee responses where there are legal implications arising from a development, such as impacts on protected sites, protected species, and requirements for Biodiversity Net Gain. In these cases, it is imperative that the correct specialist advice is obtained prior to determination. It must be assumed that the reference to “insufficient information to make the decision or more detailed advice may enable an approval” is intended to cover such circumstances, but clarity on this point is essential.

If the correct specialist advice is not secured at the application determination stage, it could result in significant delays further down the line, for example at the discharge of condition stage, or even at the implementation phase of development. Ensuring clarity and safeguarding the input of statutory and internal consultees will protect both the integrity of the decision-making process and the deliverability of development in accordance with legal and environmental requirements.

25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council is supportive of the approach set out in Policy DM5 – in particular the emphasis placed on standardised viability inputs, maintaining affordable housing provision and the importance of plan-led viability assessments as the primary starting point for any site-specific discussions. Also, the fact that any such site-specific appraisal should take place by exception which we agree should continue to be the case.

26) Do you have any further comments on the likely impact of policy DM5: Development viability?

Bullet point 2 b) relating to site characteristics appears rather superfluous given it is extremely unlikely that these will differ to such an extent that this would impact on viability considerations. The other bullet points a) c) and d) are perfectly reasonable.

27) Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?

While Section 106 agreements are an essential mechanism for securing mitigation and infrastructure, the current process for modifying obligations under Section 106A can be slow, uncertain and resource-intensive. There are several ways the process could be improved:

1. Clearer National Guidance and Consistency

Greater national guidance on the circumstances in which modifications are likely to be supported would improve consistency across local planning authorities. At present, approaches vary significantly, which can create uncertainty and delay.

2. Streamlined Application Process

The S106A modification process could benefit from a more proportionate and streamlined procedure, especially for non-material or technical amendments (e.g. trigger adjustments, phasing updates, or administrative corrections). A simplified route for minor changes would reduce unnecessary negotiation and legal costs.

3. Statutory Determination Periods and Deemed Approval

Although there are statutory timeframes, these are not always adhered to in practice. Stronger adherence to determination periods, or the introduction of a deemed approval mechanism where deadlines are missed (similar to other planning processes), could provide greater certainty.

4. Encouragement of Standardised Templates and Clauses

Wider use of standardised Section 106 clauses and drafting templates could reduce the need for subsequent modification and make amendments easier to process where required.

5. Digitalisation and Transparency

Improved digital systems for tracking obligations, trigger points, and agreed modifications would enhance transparency and reduce administrative burden for both applicants and authorities.

a) If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.

The main obstacles are considered to include:

- Limited local authority officer and legal resources, leading to prolonged negotiations.
- Lack of clear and consistent national guidance on the tests for modification under Section 106A.
- Protracted viability disputes and absence of agreed review mechanisms.
- Legal complexity of deeds of variation, even for minor or technical amendments.
- Delays in securing agreement from multiple land interests or mortgagees.

- Inconsistent approaches between authorities, creating uncertainty and risk.

Specific potential changes might include:

- Introducing a simplified or fast-track route for non-material or technical amendments.
- Providing clearer statutory tests or national guidance on when modification should be supported.
- Strengthening adherence to statutory determination periods, potentially with deemed approval mechanisms.
- Encouraging use of standardised Section 106 templates and clauses.
- Establishing clearer, more responsive viability review frameworks.

28) Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government’s commitment to boosting the supply of affordable housing.

In advance of any legislative change, the process for modifying planning obligations could be improved through practical and procedural measures aimed at supporting deliverability and affordable housing supply.

Improvements could include:

Clear national guidance encouraging a pragmatic and delivery-focused approach to S106 modifications where viability pressures risk stalling schemes, particularly those with affordable housing obligations.

Greater consistency across authorities, including model approaches to viability reassessment and affordable housing review mechanisms.

Early engagement protocols between applicants and local planning authorities to resolve issues collaboratively before formal S106A applications are submitted.

Use of standardised templates and review clauses to reduce the need for later renegotiation.

Improved resourcing and prioritisation of variation applications linked to active housing delivery.

Enhanced transparency in viability assessments, including agreed inputs and review processes, to minimise dispute and delay.

a) If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.

Section 73 is frequently used to amend conditions, including changes to phasing and trigger points that indirectly affect planning obligations. In some cases, it is relied upon to re-open discussions on affordable housing where viability pressures arise post-permission.

The interaction between Section 73 permissions and existing Section 106 agreements can create legal and procedural complexity, particularly where obligations are tied to the original permission.

There is also some inconsistency between authorities in how flexibly Section 73 is applied in relation to linked planning obligations.

Section 73 can provide a useful route to adjust tenure mix, timing of delivery, or trigger points to maintain scheme viability and avoid stalled sites.

However, there is concern that it may be used to reduce affordable housing provision without a transparent or robust reassessment of viability.

Uncertainty over whether a new Section 106 agreement is required following a Section 73 permission can also delay delivery, including affordable housing units.

Greater clarity on how affordable housing obligations should be treated where Section 73 is used would improve certainty for both applicants and local authorities.

29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

In relation to Policy DM6, the overall approach is supported, particularly its emphasis on necessity, precision, reasonableness and proportionality in the use of planning conditions and obligations.

In particular:

- The clear restatement of the established tests for planning conditions is welcomed, as it reinforces good decision-making practice and reduces the risk of overly burdensome or imprecise conditions.
- The explicit restriction on using conditions to secure financial contributions or land transfer is appropriate and maintains the distinction between conditions and planning obligations.
- The presumption in favour of national model conditions and model planning obligations should improve consistency, reduce drafting time, and limit protracted negotiation.
- The encouragement to avoid unnecessary pre-commencement conditions.
- The requirement to determine condition discharge applications in a timely manner to maintain delivery momentum.

There are however a number of important points to consider, including:

- The need for clear guidance on what constitutes “strong reasons” for departing from model conditions or obligations would help avoid inconsistency between authorities.
- Monitoring and enforcement resourcing will be important to ensure that more precise and streamlined conditions remain effective in practice.
- Where model obligations are used, there should still be flexibility to reflect site-specific viability and delivery considerations, particularly for affordable housing and infrastructure timing.

In relation to Policy DM7, we consider that it provides helpful clarification that planning decisions should focus on land-use acceptability, while avoiding duplication of controls exercised under separate regulatory regimes. The presumption that other regulatory regimes will operate effectively (unless there is clear evidence otherwise) promotes certainty and reduces unnecessary delay or repetition of technical assessments.

Encouraging parallel processing of consents is also considered to be a positive and practical measure that could help streamline delivery and reduce overall determination times.

The provision allowing post-permission changes required by other regimes to be approved, unless they would render the development unacceptable, introduces sensible flexibility and reduces the risk of stalled implementation.

31) Do you agree with the new intentional unauthorised development policy in policy DM8?
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

The policy appropriately makes clear that deliberate, intentional unauthorised development is a material consideration in any subsequent retrospective planning application or enforcement appeal, and that it should be given substantial weight.

This is a critical clarification. It ensures that developers or landowners cannot secure a procedural or commercial advantage by knowingly bypassing the planning system and seeking to regularise development after the event. Elevating intentional conduct as a significant factor strengthens deterrence and reinforces the principle that planning permission should be obtained before development is carried out.

The policy also supports public confidence in the integrity and fairness of the planning system by demonstrating that deliberate non-compliance will not be treated as neutral once development has taken place. While decisions must still be based on planning merits, it is entirely appropriate that intentional breach is not sidelined or treated as irrelevant in retrospective consideration. At the same time, the policy retains proportionality by requiring decision-makers to consider enforcement plans, impacts, and overall acceptability, ensuring that decisions remain balanced, transparent and evidence-based.

32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?

Yes. Intentional unauthorised development can give rise to a range of harms, including physical and visual impacts on the local environment, loss of amenity to neighbouring properties, harm to heritage assets, and the undermining of local planning policy objectives. There are also wider systemic harms, such as eroding public confidence in the planning system, encouraging further non-compliance, and creating unfair advantages for developers who bypass proper processes.

a) If so, are there any particular additions or mitigations which we should consider?

The proposed policy in DM8, which gives substantial weight to intentional breaches when considering retrospective applications, is likely to reduce these harms by acting as a deterrent. However, care should be taken to ensure that the policy is applied proportionately, so that minor or technical breaches where intent is less clear are not treated in the same way as deliberate, significant development without permission.

33) Do you agree with the new Article 4 direction policy in policy DM10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

We consider that Policy DM10 provides a clear and proportionate framework for the use of Article 4 directions. Limiting their application to situations where it is necessary to protect local amenity or the wellbeing of the area ensures that the removal of permitted development rights is justified and targeted, rather than applied arbitrarily. The requirement for robust evidence underpins transparency and fairness in decision-making, while the stipulation that Article 4 directions should apply to the smallest area possible ensures that restrictions are proportionate and do not unnecessarily hinder development elsewhere.

34) Do you agree with the proposed approach to setting a spatial strategy in development plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The proposed approach is largely supported, particularly the emphasis on providing clarity about the location of development, the protection or enhancement of land for specific purposes, and the allocation of sites for housing, infrastructure, and other uses. The use of key diagrams and policies maps to illustrate the spatial strategy is also helpful in improving transparency and understanding for applicants, stakeholders, and the public.

There should perhaps be a greater emphasis on the use of digital tools to effectively illustrate any such strategies in line with the Government's digital planning agenda.

We also have some concerns regarding the reliance on fixed settlement boundaries. While boundaries can provide clarity, they may be too blunt a tool in certain contexts and could limit flexibility for development that is appropriate in edge-of-settlement or transition areas. Rigid boundaries may also constrain innovative or mixed-use proposals that respond to local circumstances or changing needs over time.

Overall, the spatial strategy approach is positive, but it would benefit from a more nuanced treatment of settlement boundaries to ensure that the strategy is both clear and adaptable to local circumstances.

35) Do you agree with the proposed definition of settlements in the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

N/a

36) Do you agree with the revised approach to the presumption in favour of sustainable development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Whilst West Oxfordshire District Council supports the removal of the 'tilted balance' – the application of which – often rendering even recently adopted local plans out of date, we have concerns around the use of settlement boundaries and an overly simplistic assessment of what will be considered acceptable within and outside any such boundaries.

37) Do you agree to the proposed approach to development within settlements? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

a) Please provide your reasons, particularly if you disagree.

While the policy seeks to streamline decision-making by generally supporting development within settlements, we have significant concerns that it is too blunt a tool and could open the door to potentially unacceptable development pressure within built-up areas, which often have sensitivities such as heritage assets, constrained infrastructure, or ecological and amenity value.

In its current form, the policy risks undermining careful local plan allocations and protections, as it places a presumption in favour of development that could outweigh nuanced assessments of harm. While exceptions are listed, these may not be sufficient to prevent incremental or cumulative impacts on residential amenity, local green space, wildlife habitats, or flood risk management.

By prioritising benefits over potential adverse effects in a broad sense, the policy could inadvertently incentivise development in locations where even small-scale proposals may cause significant harm.

In essence, Policy S4 lacks the precision and safeguards needed to ensure that development within settlements is truly appropriate and context-sensitive. A more nuanced, criteria-based approach is required to balance the need for development with the protection of sensitive areas within built-up settlements.

38) Do you agree to the proposed approach to development outside settlements? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

We partly agree with Policy S5 as it provides a structured framework for identifying forms of development that may be acceptable in rural and edge-of-settlement locations.

However, we have significant concerns regarding the policy's treatment of development near railway stations. These areas may be highly sensitive, including for example Green Belt, proximity to ancient woodland, or other environmentally or visually constrained land. Without clear safeguards, the policy could create undue pressure for development in locations that are not sustainable or appropriate.

Additionally, criteria i) and j) should be explicitly considered alongside any assessment of unmet housing need that is being addressed through local plan site allocations. If this link is not made, there is a risk that unmet need could drive speculative windfall development in unsustainable locations, rather than ensuring housing delivery through planned, allocated sites. In particular, j (i) and j(ii) should not be applied in isolation but always in the context of local plan allocations, infrastructure capacity, and environmental constraints.

While the policy acknowledges the protection of Green Belt and Local Green Space, further clarity is needed to ensure that highly sensitive land outside settlements is not inadvertently placed under development pressure.

Overall, the policy is broadly supported in principle, but modifications are required to manage environmental sensitivities, reinforce plan-led housing delivery, and prevent unsustainable development pressures near transport hubs.

39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons.

We partly agree with the specific categories of development proposed for locations outside settlements and the associated criteria. The policy provides useful clarity on acceptable forms of rural and edge-of-settlement development, including agriculture, forestry, rural businesses, re-use of existing buildings, previously developed land, and development linked to evidenced unmet need. These categories reflect the need to balance development with the protection of sensitive landscapes, environmental assets, and infrastructure capacity.

However, we have concerns that some categories, particularly housing and mixed-use development near railway stations, may place undue pressure on environmentally or visually sensitive land.

In addition, the criteria for addressing unmet housing need should be applied alongside local plan allocations to ensure that development is plan-led and does not encourage speculative windfall schemes in unsustainable locations. Without these safeguards, there is a risk that the policy could inadvertently promote development in areas where adverse effects would outweigh benefits.

We also note that the policy presents an opportunity to define requirements for developments that are purely focused on nature recovery and/or Biodiversity Net Gain, such as habitat banks or other ecological enhancement schemes. At present, these types of development are not explicitly mentioned. Including such provisions would help ensure that strategic nature recovery priorities are integrated into the planning system and that environmental benefits are delivered alongside development, in line with statutory duties and local biodiversity strategies.

40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

We have significant concerns about the proposed approach to development around stations. While focusing on housing and mixed-use development that meets density requirements is sensible in principle, the policy does not adequately recognise that not all stations are equivalent, and that some are located in environmentally sensitive or protected areas. For example, several stations on the North Cotswold Line in West Oxfordshire fall within the Cotswolds National Landscape. Applying the policy uniformly risks placing development

pressure in locations where environmental, landscape, and heritage sensitivities mean such schemes are likely to be inappropriate – particularly at higher densities.

In addition, the policy is too loosely worded regarding the requirement for development to be “physically well related” to a station or the settlement within which a station is located. As drafted, this could allow housing schemes to be promoted in unsuitable locations simply on the basis that a settlement has a station, without sufficient regard to local context, environmental constraints, or infrastructure capacity.

We are not aware of direct evidence that this approach would adversely affect Gypsies, Travellers, or other groups with protected characteristics; however, the risk of speculative development in environmentally sensitive locations could create broader social and environmental pressures, including on access, amenity, and local services.

Overall, the policy in its current form is too permissive and would benefit from stronger safeguards to reflect that stations vary in context and that not all sites near stations are appropriate for development.

41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? *Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree.*

Strongly disagree.

a) If not, please provide your reasons

The application of this policy should not be contingent upon neighbourhood plans including site allocations. Many neighbourhood plans do not and yet still add a valuable local dimension to the development plan.

As drafted, Policy S6 would effectively open the floodgates to speculative development in areas that do not have a neighbourhood plan in place including site allocations – even when they may have very recently been adopted.

This will act as a complete disincentive to take such plans forward given the significant resource commitments required.

42) Do you agree with the approach to planning for climate change in policy CC1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The general provisions of draft Policy CC1 are supported in principle. However, the policy should be expanded to include reference to the setting of local energy efficiency standards alongside water efficiency, as these are essential tools for enabling local authorities to respond effectively to the climate emergency.

A key concern is that the policy does not fully reflect the intrinsic link between climate and nature recovery. While there is a brief reference to “protecting and restoring habitats, which can act as important carbon stores,” the benefits of nature-based solutions extend far wider, including flood mitigation, temperature regulation, soil protection, and biodiversity enhancement. The placement of the natural environment chapter towards the beginning of the document, alongside climate, should be considered to better reflect this interconnection.

This is the first time that the NPPF brings together the key subjects of climate, nature recovery, green infrastructure, and nature-based solutions. However, there is currently no direct recognition that nature recovery itself can contribute meaningfully to climate change mitigation and adaptation. At present, the text only implies that nature-based solutions benefit biodiversity, without acknowledging the reciprocal benefits for climate resilience.

The policy should be revised to make clear that proactive nature recovery is a central part of climate action, rather than a peripheral benefit. Recognising this connection up front would transform the way nature recovery is viewed in planning policy, placing it at the centre of creating healthier, more resilient communities and landscapes for the future.

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

The general provisions of draft Policy CC2 are supported in principle. However, the policy should go further in relation to fossil fuels. Rather than simply referring to not increasing the extraction of such materials, the policy should make explicit reference to the use of no fossil fuels. This approach has recently been secured by West Oxfordshire District Council in relation to Salt Cross Garden Village, and there is no reason why this principle should not be applied more widely across new development.

In addition, point 2, which mentions the issue of energy efficiency in relation to existing buildings, should be expanded to ensure that substantial weight is also given to the benefits of improving energy efficiency in new buildings, for example through the adoption of space heating standards and energy use intensity targets. Local authorities need these tools to drive meaningful reductions in carbon emissions and support net zero development.

Although it is positive to see point 1(f) included, referring to the creation and restoration of habitats to act as carbon stores, the policy should make a clear and direct link to wider nature recovery efforts. In particular, the implementation of Local Nature Recovery Strategies (LNRS) opportunities and integration with Biodiversity Net Gain (BNG) should be explicitly referenced.

This would ensure that the contribution of nature recovery to climate change mitigation is evident, recognising that restoring and expanding habitats, green infrastructure, and ecological networks can provide measurable carbon sequestration and climate resilience benefits.

44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

West Oxfordshire District Council supports the requirement for all major development proposals to submit a Climate Change Adaptation Statement or equivalent. The policy should also strengthen wording to require consideration of climate impacts over the entire design life of the development (e.g., 60–100 years), incorporating flexible and adaptable design approaches such as raised floor levels that allow future flood resilience upgrades, and safeguarding space for potential infrastructure improvements (e.g., larger drainage capacity, shading retrofits).

The policy should expand beyond general references to overheating by requiring a passive cooling hierarchy (orientation, shading, ventilation before mechanical cooling), setting maximum indoor temperature thresholds, mandating minimum urban greening factors or tree canopy coverage targets, and encouraging cool roofs and permeable or light-coloured surfaces. Nature-based and passive solutions should be prioritised wherever possible.

It would be beneficial for the policy to explicitly reference the protection of floodplains. While the current wording refers to locations where the risk of flooding is or can be managed, it is not clear that floodplains would be protected as a priority. Explicit protection of floodplains would deliver multiple benefits, including river restoration, nature recovery, implementation of nature-based solutions, and minimising the impact of future flooding on local communities. At present, the policy relies on cross-reference to the flooding chapter (F4 to F8 in 1a), which creates ambiguity and weakens the clarity of adaptation requirements.

Additionally, 1(d) currently focuses solely on tree planting. While urban tree planting is important for shading and microclimate regulation, adaptation measures should include a wider range of natural green infrastructure. More species-rich grasslands, woodlands, wetlands, and hedgerows can also reduce overheating, absorb sunlight and radiation, support biodiversity, and enhance wider ecosystem services. A sole focus on tree planting risks perverse outcomes and misses opportunities to integrate multiple climate adaptation and nature recovery benefits into development.

45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons.

The policy positively acknowledges wildfire risk and identifies relevant contexts, providing helpful spatial triggers for consideration. It also gives practical examples of mitigation measures, which is welcome.

However, the policy lacks clarity and precision in several respects. The phrase “at heightened risk from wildfires” is not clearly defined, making it difficult to determine when the policy should be applied. The policy does not specify whether a site-specific wildfire risk assessment must be submitted, nor does it outline what such an assessment should include, such as prevailing wind direction, topography, access for emergency services, or water supply availability.

While the policy includes mitigation measures focused on layout and vegetation management, it does not address essential building-level resilience measures. These include the use of fire-resistant materials, ember-resistant detailing such as vents, eaves, and roofing, separation distances between structures and surrounding vegetation, and access standards for firefighting vehicles. In addition, there is no requirement for ongoing management plans to maintain defensible space or manage vegetation over the lifetime of the development.

Although the policy sits within a climate adaptation framework, it does not explicitly reference projected increases in wildfire frequency or intensity, nor require future climate scenarios to be considered. Furthermore, the policy does not recognise that the creation and restoration of habitats can play a key role in building resilience to wildfires.

Appropriately managed habitats that store water, act as fire breaks, and maintain diverse vegetation structures can reduce the risk of fire spread while delivering multiple benefits for biodiversity, nature recovery, and wider ecosystem services. Integrating habitat-based approaches alongside conventional building and layout strategies would provide a more holistic and effective approach to wildfire risk management.

46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?

Wildfire adaptation measures should be embedded within wider good design principles so that resilience is achieved without compromising placemaking, landscape quality or biodiversity.

Defendable space, firebreaks and reduced fuel loads can be integrated into attractive green corridors, public open space and street layouts, ensuring they serve amenity and ecological functions as well as safety purposes.

Building orientation, access routes and boundary treatments should be planned to support emergency access and limit fire pathways while maintaining coherent street scenes. The use of fire-resistant materials and ember-resilient detailing can be incorporated into high-quality architectural design. Importantly, vegetation strategies should balance wildfire risk reduction with climate adaptation goals such as urban cooling and habitat creation.

Additional guidance would be helpful in the form of a clear requirement for site-specific wildfire risk assessments in defined risk areas, mapped evidence identifying zones of heightened risk, and design guidance setting out minimum separation distances, suitable planting palettes, material standards and long-term landscape management expectations. Case studies and illustrated design codes would also support consistent implementation while maintaining overall design quality.

47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?

National planning policy should more clearly empower local planning authorities to set locally appropriate energy efficiency and carbon reduction standards for new development, rather than limiting them to the minimum requirements set through Building Regulations. A nationally fixed ceiling risks constraining ambition in areas that have already evidenced viability and local support for higher standards, particularly where authorities have declared climate emergencies or adopted robust local plan policies.

Restricting local discretion would undermine plan-led strategies that seek to secure net zero carbon development through fabric-first performance standards, on-site renewables, and whole-life carbon reduction. It would also create tension with recently adopted plans that were found sound through examination, including the Salt Cross Area Action Plan, which embeds higher environmental performance expectations as a core place-shaping principle. Reverting to a Building Regulations-only approach would therefore run counter to the evidence base and policy direction already endorsed at examination and could place the delivery of genuinely net zero carbon development at risk.

The Framework should instead provide a clear route for authorities to adopt higher operational and embodied carbon standards where supported by evidence of viability and local need, ensuring that national policy sets a strong baseline but does not cap ambition. This would maintain consistency with the plan-led system, provide certainty to developers through locally defined expectations, and support the accelerated transition required to meet national carbon reduction commitments.

In addition, national policy on climate change should explicitly recognise the intrinsic link with nature recovery and take a more holistic approach to tackling the climate and ecological emergencies. Actions that implement Local Nature Recovery Strategies (LNRS) and Biodiversity Net Gain (BNG) can make a measurable contribution to climate regulation and resilience, for example by sequestering carbon, reducing flood risk, moderating temperatures, and enhancing landscape-level ecosystem services.

Integrating these approaches into planning policy ensures that climate action and nature recovery are mutually reinforcing, delivering long-term benefits for both communities and the environment.

48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The general provisions of Policies HO1 and HO2 are supported in principle. We have concerns about the practicalities of setting housing requirement figures for Neighbourhood Plan areas and further guidance should be provided if this is taken forward.

We also have concerns about the inferences made regarding housing requirement figures being set above housing need figures 'where appropriate'. Whilst we acknowledge that assisting a neighbouring authority in terms of unmet need is likely to represent a valid reason for increasing a housing requirement, we have concerns that the reference to economic development and infrastructure investment is likely to lead to increased pressure on local authorities who are already dealing with very challenging housing need figures as a result of the new standard method.

49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) If so, what elements should this guidance cover?

Current guidance on the assessment of affordable housing need is considered adequate as is guidance on the assessment of the needs of travelling communities.

Less clear is guidance on the assessment of people wishing to commission or build their own homes and assessing the needs of families with children including how any such needs should then be reflected in development plan policies.

50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

We are supportive of the currently separate planning policy for traveller sites being incorporated into the Framework for ease of reference.

51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) If so, what are the key principles this guidance should establish?

Updated guidance should establish clear principles, including a standardised methodology for assessing current and future need that distinguishes between permanent, transit and emergency stopping provision. It should clarify the definition of need, including how household formation rates are derived, how concealed or doubled-up households are counted, and how

turnover assumptions should be treated. Guidance should also address how to factor in unauthorised developments and encampments, cross-boundary movements, and the implications of changes to national policy definitions.

The time period for projecting need should align clearly with the development plan period, with expectations for regular review where evidence becomes dated. Authorities should also be guided on how to use a proportionate and culturally sensitive evidence base, including effective engagement with Gypsy and Traveller communities to ensure under-reporting is minimised.

Finally, the guidance should link need assessment to deliverability, setting expectations around identifying a supply of specific, developable sites and realistic lead-in times, so that requirement figures are credible and capable of being met in practice.

52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Annex D is clear but the District Council has significant concerns about the principle of applying a 20% buffer in any circumstances given the challenges presented to most local authorities under the new standard method.

53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

N/a

54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

It would be helpful if the text of the Framework were to clarify that no buffer will be applied in relation to traveller sites and 5-year housing land supply requirements.

55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

a) Please provide your reasons, particularly if you disagree.

While Policy HO4 provides a helpful high-level framework, the plan-making requirements are not sufficiently clear or precise to ensure consistent and effective implementation, particularly for developments of strategic scale and complexity.

The policy rightly emphasises infrastructure alignment, sustainable community principles and environmental safeguards, and it refers to design tools such as masterplans and design codes. However, it lacks clarity in several key respects.

First, there is limited guidance on how authorities should evidence that infrastructure can be delivered “at appropriate points” in the development trajectory. The policy does not clearly set out expectations around infrastructure funding strategies, delivery mechanisms, contingency planning, or the role of infrastructure providers. For schemes comparable in scale to new settlements, greater certainty is needed around phasing.

Second, while reference is made to “New Town principles,” there is no definition or cross-reference to a recognised framework. Without clearer articulation, this risks inconsistent interpretation at examination and during masterplanning.

Third, the requirement to support a sustainable community “without expecting an unrealistic level of self-containment” is conceptually sound but imprecise. The policy does not explain how authorities should assess what level of employment, retail, education or community provision is proportionate at different scales of growth, nor how this should evolve over time.

Fourth, although the policy refers to delivery mechanisms such as joint ventures and development corporations, it stops short of setting expectations for governance, long-term stewardship, land value capture, or community ownership models - all of which are often critical to the success of large-scale developments.

56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

The proposed changes to the definition of Designated Rural Areas are a positive step and are likely to improve the ability of local authorities to secure social and affordable housing contributions from minor development in smaller, less densely populated parishes. Allowing affordable housing requirements to apply to developments below the major development threshold in settlements of 3,000 people or fewer (with low population density) should help address persistent under-delivery in rural areas, where sites are typically small and opportunities to secure contributions are otherwise limited.

However, while this expanded definition strengthens policy tools, it may not in itself be sufficient to significantly increase delivery. Viability constraints on small rural schemes, limited land supply, and land value expectations can still restrict the scale of affordable provision. Without complementary measures such as stronger support for rural exception sites, clearer

guidance on proportionate viability assessment for small schemes, and mechanisms to support registered providers in high-value rural markets, the practical impact may be uneven.

There is also a need for clarity on how the revised definition will operate alongside Section 157 of the Housing Act 1985 designations, to avoid confusion and ensure consistency in application.

The concern is that if the terminology overlaps but the geographic coverage or legal basis differs, it could create confusion for plan-makers, applicants and decision-makers.

57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

a) Please provide your reasons, and would you support an alternative minimum percentage requirement?

The Government previously suggested that all new homes would be required to be built to Part M4(2) standards and so setting a minimum target of 40% is a retrograde step.

Achieving Part M4(2) standards represents a very modest additional cost and would have no effect on viability. It should therefore be a standard requirement in all new homes.

59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

This is vital to ensuring that specialist provision (e.g. travelling communities and specialist older persons housing) is able to come forward. Such uses are often out-competed by mainstream housing provision and if they are to come forward, it is essential that specific sites or parts of specific sites are allocated specifically.

60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?

The principle of encouraging a broader mix of tenures on larger sites is supported although as currently worded in the draft Framework is not explicit. The text as currently drafted simply requires local authorities to set out policies for the mix of tenures to be provided on sites of 150+

What it should say is that for all larger sites of 150+ units, local authorities will be expected to require a broad range of tenures to meet identified needs including, where appropriate, accommodation for older people, students, custom and self-build and travelling communities.

61) Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons

Whilst we support the principle of bringing forward a greater number of smaller sites, the practicalities of doing so need to be more clearly recognised. Smaller proposals in rural areas are often greeted with a great deal of local opposition and the greater number of such sites which are allocated, the more contentious and complex a local plan examination is likely to become. This will be further exacerbated by the proposal to require an additional 10% of the overall housing requirement to be provided on sites of between 1 and 2.5 hectares.

A better alternative would be to require local authorities to make provision for smaller sites but rather than specifying a national 10% target, to instead require each local authority to set out and evidence what they consider to be the most appropriate target for their area. In some instances, this may be above 10% and conversely, elsewhere, may be less.

62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

No.

63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

N/a

64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

a) Please provide your reasons, particularly if you disagree.

If development viability is properly established at the plan-making stage, it should not be necessary to apply a more flexible approach to the size of market homes. Whilst achieving policy compliant levels of affordable housing (including social rent and other tenures) is essential, this should not be at the expense of market homes. Inevitably such an approach is likely to put a squeeze on such provision and either lead to few numbers of larger homes or larger numbers of smaller homes. Either way, the outcome is not likely to be balanced or properly reflect local needs.

65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?

All qualifying affordable housing schemes (typically 11+ units) should be required to provide half (50%) of any affordable housing requirement in the form of social rented accommodation. Establishing a national requirement such as this would be helpful as it would then feed into whole plan viability assessments to understand the potential viability impact on other developer requirements.

66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?

Yes, changes to planning policy are likely needed to better support affordable temporary accommodation such as stepping stone housing. Current policy, including the National Planning Policy Framework, does not clearly distinguish transitional housing from permanent homes, which can limit flexibility and viability.

a) If so, what changes would be beneficial?

Beneficial changes would include formally recognising stepping stone housing as a distinct typology and allowing proportionate flexibility around the Nationally Described Space Standard where accommodation is genuinely time-limited and well managed. This flexibility should be tied to clear safeguards to ensure safety, quality and appropriate move-on arrangements. Such reforms would help deliver affordable temporary homes without lowering standards overall.

67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree.

a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.

West Oxfordshire District Council fundamentally opposes this proposed change. In short, there is no reason at all as to why medium-scale sites should not deliver affordable housing on site and applicants should not have broad discretion to meet social and affordable housing requirements through cash payments in lieu of on-site delivery.

On-site provision is significantly more effective at delivering genuinely mixed and balanced communities, which is a core objective of the National Planning Policy Framework. Allowing routine commuted sums would undermine this objective by separating affordable homes from market housing and concentrating provision elsewhere.

Commutated sums are frequently less effective in practice. They can be delayed, reduced through viability negotiations, or absorbed into wider funding gaps, resulting in fewer homes delivered overall and slower delivery. There is no compelling justification for exempting medium-scale sites from providing on-site affordable housing; such schemes are typically large enough to accommodate an appropriate tenure mix without prejudicing viability.

Allowing cash in lieu also risks creating mono-tenure developments and weakening social integration at precisely the scale where mixed communities can and should be achieved.

If any flexibility were to be considered, it should be strictly limited to genuinely exceptional circumstances.

b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer

Yes – in certain circumstances, on-site provision will not be possible or preferable but that is already reflected in the text of the current Framework which should either be retained or only modified slightly. Such circumstances are already recognised in most local plans which apply a type of sequential approach seeking on-site provision in the first instance, followed by consideration of changes to quantum or tenure mix and then consideration of commuted sums for off-site provision as a last resort.

This principle must be reflected at the national level.

68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).

A policy allowing routine cash payments in lieu of on-site affordable housing on medium sites would carry significant risks, with limited and uncertain benefits.

In terms of SME housing delivery, there may be a perceived short-term benefit if commuted sums simplify scheme design and reduce negotiation complexity. However, medium sites are generally capable of accommodating policy-compliant affordable housing, and there is little clear evidence that on-site provision is a primary barrier to SME participation. A blanket flexibility risks overstating viability constraints and could incentivise land transactions at higher values based on reduced on-site obligations.

On overall housing delivery and build-out rates, the impact is uncertain and could be negative. On-site affordable housing often supports delivery by forward-funding or de-risking schemes through early acquisition by Registered Providers. Removing that route may slow build-out, particularly where SMEs rely on phased disposals to support cash flow. Cash contributions can also delay affordable delivery if local authorities must subsequently assemble sites and funding to bring forward separate schemes.

The most significant risk relates to overall social and affordable housing delivery. Commuted sums frequently result in fewer homes being delivered, due to viability reductions, funding gaps, or delivery lag. There is also a clear risk of greater spatial segregation, undermining the objective of mixed and balanced communities embedded in the National Planning Policy Framework. This is particularly problematic on medium sites, which are well suited to integrating a meaningful but proportionate affordable housing component.

Land values are also likely to adjust upward if developers anticipate cash-in-lieu flexibility. This risks embedding reduced affordable delivery into residual land values, making it harder to secure on-site provision in future and weakening the effectiveness of policy.

For Registered Providers, including SME providers, the policy could reduce access to small and medium-sized on-site opportunities that are often more manageable and geographically dispersed. Larger, off-site schemes funded through commuted sums may favour bigger providers and reduce market diversity. It may also increase uncertainty around pipeline and timing.

Overall, while there may be limited administrative benefits for some applicants, the risks to affordable housing numbers, tenure integration, land value inflation and delivery certainty are substantial. The policy could weaken rather than strengthen both overall housing outcomes and the sustainability of the affordable housing sector.

69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.

If commuted sums are to play a greater role, clearer national guidance would be needed on timeframes, pooling, and flexibility of use, alongside stronger alignment between planning, housing and funding regimes. Greater certainty over grant funding, streamlined procurement rules, and the ability to combine commuted sums with other subsidy without penalty would also help accelerate delivery.

However, it is important to stress that delays in spending commuted sums are rarely the result of inaction by Local Planning Authorities. In most cases, barriers relate to land availability, viability constraints, funding gaps, Registered Provider capacity, and wider market conditions. Without addressing those structural constraints, simply increasing the volume of commuted sums will not in itself result in faster or more effective affordable housing delivery.

70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?

Yes.

a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.

Further guidance would be helpful, particularly to ensure consistency and to avoid systematic under-valuation of commuted sums.

Any guidance should make clear that cash contributions in lieu must represent the full policy-compliant value of on-site provision, not a discounted or negotiated alternative. A clear principle should be that the contribution is equivalent to the value of providing the required affordable housing on-site, with no financial advantage arising from off-site delivery.

In practice, this could be framed through a transparent viability-based comparison of the Gross Development Value of the proposed market scheme and the Gross Development Value of a policy-compliant scheme including on-site affordable housing, ensuring that the resulting sum captures the true cost of foregone on-site provision. The guidance should also emphasise transparency, standardised inputs where possible, and safeguards against double-counting or circular viability arguments. Without such clarity, there is a significant risk that commuted sums will deliver fewer affordable homes in practice than on-site provision would have achieved.

71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

a) Please provide your reasons, particularly if you disagree.

While there may be limited circumstances where off-site delivery could optimise outcomes, the starting point should remain on-site provision. Mixed and balanced communities are a core objective of the National Planning Policy Framework, and routine reliance on off-site delivery risks undermining tenure integration and reinforcing spatial segregation.

In practice, claims that off-site provision will improve quality or quantity can be difficult to verify and may be used to justify reducing on-site obligations. There is also a delivery risk with off-site schemes often depending on separate land assembly, funding alignment and Registered Provider capacity, which can introduce delay or reduce overall numbers. On-site provision, by contrast, is directly tied to the parent scheme and is more certain to come forward in parallel.

If off-site delivery is to be enabled, it should be strictly controlled and permitted only where it demonstrably delivers equal or greater affordable housing outcomes in both quantitative and qualitative terms, with clear safeguards around timing, tenure mix and location. It should not become a generalised alternative to policy-compliant on-site provision.

72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The broad thrust of Policy HO9 is supported, particularly the emphasis on accessibility, proximity to services, and appropriate management arrangements. Requiring housing for older people to be located where residents can easily and safely access frequently used services by walking, wheeling or public transport is consistent with good placemaking principles and with the objectives of the National Planning Policy Framework. Similarly, the requirement for delivery to M4(2) or M4(3) standards is appropriate to ensure homes are genuinely fit for an ageing population.

However, there is a risk that the locational criteria could be applied too rigidly, particularly in smaller towns, rural areas or edge-of-settlement sites where service provision is more limited but need for specialist accommodation is still acute. An overly restrictive interpretation could unintentionally constrain delivery and reduce choice, especially where schemes may themselves support local services or include on-site facilities.

For specialist community-based and student accommodation, the focus on management plans and access to services is sensible and proportionate. Overall, the policy is sound in principle, but implementation should allow for flexibility based on local context, viability and demonstrated need, rather than applying uniform spatial tests that could inhibit delivery in certain areas.

73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The proposed criteria are broadly appropriate. Ensuring that community-based specialist accommodation is located where residents can safely and easily access frequently used services, and requiring a clear management plan to demonstrate how a safe and secure environment will be maintained, are sensible safeguards.

However, care is needed to avoid overly rigid locational expectations. Many forms of community-based specialist accommodation serve vulnerable groups whose needs, support networks and funding arrangements may not always align neatly with highly central or service-rich locations. In some cases, quieter or edge-of-centre locations may be more appropriate for wellbeing, safeguarding or operational reasons.

The glossary changes should therefore provide clarity without narrowing the definition in a way that unintentionally excludes legitimate forms of provision.

74) Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The criteria for purpose-built student accommodation and large-scale shared living are broadly sensible. Requiring locations with easy and safe access to frequently used services, relevant education facilities, and public transport supports sustainable travel and aligns with the overall objectives of the Framework. Similarly, ensuring adequate communal facilities and management plans helps maintain quality and safety, which is important given the high turnover and intensity of use in these developments.

However, a rigid application of these criteria could unnecessarily restrict delivery in areas with high student or shared-living demand, especially where peripheral sites are well-connected by public transport or on-site amenities. Glossary changes should clarify definitions but not create barriers that prevent viable schemes in locations that can function effectively for residents. Flexibility is needed to balance accessibility with site availability and local housing pressures, rather than applying a strict locational test.

75) Do you agree the proposals provide adequate additional support for rural exception sites? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, including what other changes may be needed to increase their uptake?

The proposals provide a useful framework to support rural exception sites, particularly by emphasising local need, restricting site size, and prioritising affordable housing. Requirements for sites to be well-related to existing settlements and for development to respond to up-to-date local housing needs are appropriate safeguards that align with the objectives of the National Planning Policy Framework.

However, uptake of rural exception sites remains constrained by practical barriers, including limited availability of suitable land, uncertainty over funding for affordable units, and the administrative burden of demonstrating local need. Additional support could include greater flexibility on site thresholds in smaller settlements, stronger alignment with funding mechanisms to reduce reliance on market cross-subsidy, and clearer guidance on land release from public or community ownership. These measures would help unlock more rural exception schemes and ensure they can deliver the intended affordable housing outcomes.

76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

Removing First Homes exception sites as a discrete category is sensible. First Homes are already a form of affordable housing, and retaining a separate exception site route creates unnecessary duplication and complexity within the planning system. Consolidating all affordable housing exception sites under a single framework would simplify policy, reduce confusion for applicants and local authorities, and provide greater flexibility to respond to local housing needs, without undermining the delivery of First Homes.

77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?

Setting a benchmark land value for rural exception sites could help bring forward more affordable homes by providing greater certainty for developers and landowners, reducing negotiation disputes, and limiting land price inflation that can block delivery. A clearly defined benchmark also supports consistent decision-making across local authorities and encourages landowners to release suitable sites for affordable housing.

Of the options suggested, using a benchmark of £10,000 per plot appears most practical, as it provides a simple, transparent starting point while remaining broadly reflective of rural land markets. Existing use value could be applied where exceptional circumstances make the standard benchmark unrealistic.

78) Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

79) Please provide your reasons, particularly if you disagree.

The proposals in HO12 capture many key elements of the existing Planning Policy for Traveller Sites (PPTS), particularly the emphasis on settled bases, access to services, health and wellbeing, and avoiding social isolation. Including requirements to consider local need, personal circumstances, and fair treatment for all travellers (not just those with local connections) is also welcome and aligns with the principle of equitable planning decisions.

However, there is a risk that some criteria could be interpreted too rigidly, particularly around site design and integration, which could inadvertently constrain delivery of suitable sites. For example, ensuring sites are not “isolated from the rest of the community” is important in principle, but overly prescriptive guidance could make it difficult to locate sites in areas where land availability is limited. Similarly, while involvement of existing residents in relocations is sensible, practical guidance may be needed to ensure this is feasible without causing delays.

80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

HO13 provides a useful framework to encourage timely delivery of homes by considering housing tenure mix, local market conditions, and development phasing. Measures such as shorter-than-default commencement periods and flexible frameworks for large-scale, phased developments are positive steps to reduce unnecessary delays while accommodating changes in viability, design, and housing need.

However, the policy alone is unlikely to guarantee faster build-out. Many delays stem from structural constraints, such as infrastructure requirements, utility connections, and site assembly.

A further significant factor is the deliberate practices of some developers, including landbanking or holding permissions to influence local housing supply, which can prevent local authorities from maintaining a five-year housing land supply and slow the delivery of homes even on ready-to-develop sites.

To be fully effective, HO13 should be complemented by stronger measures to discourage speculative landholding and ensure permissions are actively translated into homes on the ground.

81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Encouraging a flexible consenting framework for large-scale residential and mixed-use development is sensible, as it allows schemes to adapt to changing housing need, viability, and design considerations over time. Flexibility can, in some instances, help unlock complex sites, support phased delivery, and ensure infrastructure and affordable housing requirements remain achievable throughout the development lifecycle.

However, flexibility alone may not be sufficient to fully realise the opportunities of large-scale development. Challenges such as land assembly, infrastructure delivery, utility connections, and developer strategies including slow build-out, can still delay progress and limit the benefits of these sites.

To maximise large-scale opportunities, the policy should be paired with measures that incentivise timely development, hold developers to account, and ensure that flexible frameworks do not become a route for indefinite delays or under-delivery of affordable housing.

82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? *Yes, no*

Yes.

a) Please provide your reasons.

Delivering very large or “super strategic” sites, including new towns, requires more specific approaches than standard planning mechanisms can provide. These developments involve complex land assembly, long phasing periods, major infrastructure requirements, and multiple stakeholders, which can create significant risks for timely delivery if handled through conventional planning alone.

Effective delivery mechanisms such as development corporations, local development orders, or tailored masterplanning frameworks can provide the governance, coordination, and certainty needed to bring these sites forward. They allow for streamlined decision-making, early infrastructure provision, and secure funding, while maintaining oversight of design quality, affordable housing delivery, and community integration.

Without such mechanisms, the scale and complexity of these sites risk slow build-out, piecemeal development, and under-delivery of housing and infrastructure.

Specific definitions and approaches would therefore support clarity, accountability, and the successful delivery of very large strategic developments.

83) Do you agree with the proposed changes to the Housing Delivery Test rule book?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Updating the Housing Delivery Test (HDT) rule book to use the most recently adopted plan for calculating housing requirements provides greater clarity and better aligns the test with a planned approach. Removing the 'lower of' rule simplifies the system and ensures that local authorities are measured against a clear, up-to-date target, which can support accountability and strategic planning.

However, there are potential risks. Authorities could face pressure to meet ambitious adopted targets that may not reflect current market conditions, infrastructure constraints, or viability challenges.

While aligning the HDT with the most recent plan makes sense in principle, additional guidance or flexibility may be needed to account for exceptional local circumstances, phased delivery, or sites where strategic planning assumptions have changed since adoption. Without this, there is a risk that the HDT could penalise councils despite genuine efforts to deliver housing, particularly on complex or large-scale sites

84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy E1 appropriately emphasises the need for flexibility in planning to support long-term economic growth. By recognising the importance of changing commercial property requirements and avoiding overly prescriptive site use designations, the policy allows development plans to respond to evolving market demands, technological innovation, and sector-specific needs. Explicit reference to Industrial Strategy Zones, AI Growth Zones, and wider national strategies will help to ensure that local plans align with government priorities, while also supporting investment, job creation, and infrastructure delivery.

However, there is a need for caution. If development plans are too unprescriptive, this can create a degree of uncertainty for investors and developers. Striking the right balance between flexibility and certainty is essential to provide confidence for businesses while still enabling local authorities to respond to changing economic circumstances.

85) Do you agree with the approach to meeting the need for business land and premises in policy E2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy E2 provides a clear framework to support business growth by giving substantial weight to the economic benefits of commercial development and recognising sector-specific needs, such as freight, logistics, and agricultural modernisation.

Emphasising market signals, locational requirements, and infrastructure capacity helps ensure that development proposals address genuine unmet need while aligning with local and national economic strategies, including Industrial Strategy Zones and AI Growth Zones.

However, there is a risk that the policy could be interpreted too broadly in favour of economic benefits, potentially overriding other planning considerations such as environmental protection, amenity, or landscape impacts. While supporting business development is important, careful implementation is needed to ensure that granting weight to economic benefits does not create uncertainty or undermine the balance between growth, sustainability, and local planning priorities.

86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy E3 provides a clear and useful framework for supporting freight and logistics development, recognising the sector's unique locational and operational requirements. Emphasising access to transport networks, efficient movement of goods, and appropriately designed facilities is essential to support economic growth and supply chain resilience. Co-location and intensification of facilities, along with adequate parking provision, are sensible measures to optimise land use and operational efficiency.

However, the policy's wording on impacts to local residents and neighbouring uses could be interpreted as implying that some negative effects are inherently acceptable. While mitigation is important, development decisions should prioritise protecting amenity and local quality of life. A more nuanced approach is needed to ensure that proposals balance operational needs with the rights and wellbeing of nearby communities, rather than treating potential impacts as automatically acceptable.

87) Do you agree with the approach to rural business development in policy E4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy E4 provides a sensible framework to support the sustainable growth of rural businesses, including agricultural diversification, rural tourism, and facilities that enhance farm viability. Emphasising the conversion of existing buildings, well-designed new development, and the retention of local services aligns with the wider objectives of sustainable rural growth.

However, there are some potential concerns. The policy acknowledges that rural business development may need to be located outside settlements and in areas with limited public transport, but the guidance on siting and design could benefit from stronger emphasis on minimising environmental impacts and protecting local amenity. While using previously developed land where possible is positive, rural sites are often constrained, and there may be tension between operational needs and landscape or ecological protection.

88) Do you agree with the proposed changes to policy for planning for town centres?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council considers that Policy TC1 provides a clear and comprehensive framework to support the vitality and viability of town centres. Emphasising design guides, codes, and masterplans is also positive, as these tools can help create distinctive, attractive, and well-functioning centres.

However, some caution is needed. Removing the explicit ten-year look-ahead may reduce certainty for developers and investors, particularly for larger schemes requiring long-term planning and infrastructure coordination.

89) Do you agree with the approach to development in town centres in policy TC2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) If not, please explain how you would achieve this aim differently?

Policy TC2 provides a clear and positive approach to supporting town centre vitality and viability. Giving substantial weight to proposals that diversify uses, enable residential development, and protect or improve access to local shops aligns with the objectives of sustainable, inclusive, and well-functioning centres.

The latter point is particularly supported as the issue of access to local shops and services is a key consideration in rural areas such as West Oxfordshire.

By explicitly linking development benefits to both economic activity and community access, we consider that this policy will help to encourage investment while maintaining the social and functional role of town centres.

90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?

West Oxfordshire District Council considers that the introduction of Class E has increased flexibility in the use of commercial premises, but it has also reduced the influence of the sequential test in guiding development towards town centres. This has meant that some retail and service uses can now change use outside of designated centres without planning permission, thereby undermining the vitality and viability of smaller town and village centres.

91) Do you believe the sequential test in policy TC3 should be retained? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The Council supports the retention of the sequential test in TC3, as it remains a useful tool to steer new development for main town centre uses to locations that strengthen existing centres. At the same time, the flexibility introduced in considering format, scale, and the potential to accommodate development across multiple sites is welcomed, as it reflects the practical realities of West Oxfordshire's town centres, where sites are often constrained or fragmented.

West Oxfordshire District Council therefore believes that TC3 strikes an appropriate balance between ensuring town centre first principles are maintained and allowing sufficient flexibility to reflect local circumstances. However, the Council notes that ongoing monitoring will be important to ensure that the influence of Class E does not inadvertently encourage out-of-centre development at the expense of the district's town centres.

92) Do you agree with the approach to town centre impact assessments in policy TC4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council considers that Policy TC4 provides a reasonable and proportionate framework for assessing the impact of out-of-centre retail and leisure development. The approach of requiring impact assessments for proposals above a defined threshold aligns with the need to protect the vitality and viability of town centres such as Witney, Chipping Norton, and Carterton, while providing flexibility for smaller-scale development.

The Council welcomes the clarification that a failure to meet the impact test is not an automatic reason to refuse permission, as this allows for a balanced assessment of economic, social, and environmental factors.

However, it is important to ensure that the weight given to town centre impacts remains sufficient to protect local centres from disproportionate out-of-centre development, particularly in the case of smaller town centres and dispersed rural communities.

93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council considers that Policies CO1 and CO2 provide clearer and stronger support for the rollout of 5G and gigabit-capable broadband infrastructure. Emphasising the use of existing sites before proposing new infrastructure will help to minimise visual impacts and supports efficient network expansion, while also encouraging sustainable deployment practices. The policies' clarity on design, siting, and compliance with international guidelines on non-ionising radiation will also help to provide certainty for both applicants and local authorities.

The consolidation of guidance on supporting information in CO2 is also welcome, as it sets out reasonable expectations without introducing new burdens, ensuring that applications are properly evidenced while avoiding unnecessary procedural delays.

94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

We consider that the requirements to minimise visual impact and to prioritise the use of existing structures are practical and will help to ensure sustainable and sensitive deployment of telecommunications infrastructure. Encouraging applicants to reuse masts, buildings, or other structures aligns with good design practice and is likely to help reduce unnecessary landscape harm.

However, in practice there can be constraints that limit how feasible this is, particularly in rural areas such as West Oxfordshire where suitable existing structures may be sparse, and network coverage requirements for 5G and gigabit broadband are demanding. Strict adherence to these requirements could, in some cases, delay delivery or increase costs if alternative sites must be sought. Flexibility is therefore important to balance the objectives of minimising visual impact with the operational need to provide effective and reliable coverage.

95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council considers that the supporting information requirements in policy CO2 are proportionate and sufficient. They clearly set out what evidence is needed, such

as demonstrating reuse of existing structures and compliance with international guidelines, without imposing additional or unnecessary procedural burdens on applicants.

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

Policy W1 provides an appropriate and proactive framework for planning for energy and water infrastructure. Early engagement between plan-making authorities, utility providers, regulators, and network operators is essential to identify current and future constraints, particularly given the district's growth ambitions.

This is a topical and important issue for West Oxfordshire, where wastewater capacity and, to a lesser extent, water supply are critical considerations in determining the scale and timing of new development. Ensuring that development plans reflect infrastructure needs, support upgrades, and avoid constraining network operation is essential to prevent delays or adverse impacts on new and existing communities.

97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

Policy W2 provides a clear and positive update to planning for renewable and low-carbon energy and electricity network infrastructure. Explicitly including standalone electricity network infrastructure recognises the growing importance of grid capacity in supporting both new development and low-carbon energy projects.

The requirement for development plans to identify suitable areas for renewable and low-carbon energy, including opportunities for re-powering and life extensions, is practical and helps provide certainty for developers and investors.

In West Oxfordshire, where sustainable energy provision and resilience of the electricity network are increasingly relevant to supporting growth and climate objectives, this approach ensures that new developments can be efficiently connected to low-carbon energy sources.

The emphasis on decentralised networks and co-location of energy supply and demand is also welcome, as it promotes efficiency, reduces carbon emissions, and aligns with wider sustainability goals.

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

West Oxfordshire District Council welcomes Policy W3 as a largely positive and supportive framework for renewable and low-carbon energy development and electricity network infrastructure. Giving substantial weight to benefits for energy security, economic development, net zero, and re-powering existing sites is sensible, and recognising the contribution of small-scale and community-led projects reflects the importance of local initiatives in achieving climate objectives. The emphasis on decommissioning and site restoration for time-limited developments is also appropriate and provides clarity for applicants and decision-makers.

However, the Council has major concerns regarding bullet point 2, which states that applicants should not be required to demonstrate the need for renewable or low-carbon energy development or electricity network infrastructure. While encouraging development in general is important, entirely removing the need to demonstrate need could lead to poorly planned proposals coming forward in locations where infrastructure capacity, environmental constraints, or local sensitivities make development unsuitable. This could create uncertainty for local planning authorities and risk undermining careful strategic planning for energy infrastructure in West Oxfordshire.

In addition, the policy should specifically recognise and encourage the environmental benefits of renewable and water-related developments. While economic and societal benefits are highlighted, there is no explicit reference to nature recovery. Developments should be encouraged to integrate enhancements for biodiversity, particularly through the implementation of opportunities identified within Local Nature Recovery Strategies (LNRS). This could include habitat creation, restoration, or ecological improvements alongside renewable infrastructure, ensuring that energy projects deliver measurable contributions to both climate objectives and the local environment.

99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council welcomes Policy W4 as a clear and positive framework to support water supply, drainage, and wastewater infrastructure. Giving substantial weight to proposals that increase capacity, improve water quality, and reduce water-borne pollution is appropriate, particularly in a district where wastewater capacity is a key constraint on delivering new housing and supporting economic growth.

The Council considers it especially important that additional weight is given to proposals which facilitate the early delivery of new homes, helping to ensure that planned growth in West Oxfordshire can proceed without unnecessary delays.

In addition, there is a significant opportunity for water-related developments to make positive contributions towards nature recovery. By integrating habitat creation, restoration, and other ecological enhancements, particularly through the implementation of opportunities identified in Local Nature Recovery Strategies (LNRS), such developments can deliver multiple benefits.

100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council supports the proposed prohibition on identifying new coal sites and the removal of coal from the list of minerals of national and local importance. This approach aligns with national priorities to reduce reliance on fossil fuels, support the green energy transition, and achieve net zero objectives. Continuing to plan for coal would be inconsistent with the government's licensing reforms and wider climate commitments.

The Council welcomes the emphasis on critical and growth minerals, which are increasingly important for supporting renewable energy, low-carbon technologies, national security, and the development of key industrial sectors.

101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council supports the approach in Policy M1 regarding oil and gas, which maintains planning for exploration, appraisal, and production within licensed areas while preventing the identification of new sites or extensions outside these areas. This approach provides clarity and aligns with the government's position not to issue new onshore oil and gas licenses, supporting the transition away from fossil fuels.

102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council supports the proposed addition of critical and growth minerals to the glossary definition of "minerals of national and local importance." Recognising

these minerals reflects their increasing economic and strategic significance, particularly for supporting the green energy transition, net zero objectives, national security, and key sectors identified in the Industrial Strategy.

Including these minerals in the glossary ensures consistency in interpretation across development plans and reinforces the importance of supporting sustainable domestic supply where feasible, while balancing environmental protection and local community interests.

103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non-minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council supports the intention of Policy M2 to prevent the sterilisation of mineral resources, recognising that minerals are finite and can only be worked where they occur. The requirement for prior extraction on sites allocated for non-mineral development, where practical and environmentally feasible, provides much-needed clarity and stronger protection.

However, the Council considers that there is a need for careful flexibility to ensure that requiring prior extraction does not unnecessarily delay or render non-mineral development unviable, particularly for smaller or environmentally sensitive sites.

A rigid application of prior extraction could create tensions with housing and infrastructure delivery. The policy strikes a reasonable balance, but local authorities should retain the ability to assess feasibility and environmental impact on a site-specific basis.

104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council supports Policy M3's explicit recognition of critical and growth minerals and the substantial weight to be given to their exploration, extraction, and processing. The policy reflects the growing strategic importance of these minerals in supporting the green energy transition, achieving net zero targets, safeguarding national security, and underpinning the growth of key sectors outlined in the Industrial Strategy.

105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

106) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council supports the exclusion of onshore oil and gas extraction from Policy M3. This approach aligns with the national commitment to transition away from fossil fuels and reduce greenhouse gas emissions, supporting net zero objectives.

Including onshore oil and gas in the same category as critical and growth minerals would be inconsistent with broader climate and energy policy and could undermine the focus on sustainable mineral resources. Excluding it provides clarity for local planning authorities and ensures that planning decisions prioritise low-carbon and strategically important minerals over fossil fuel extraction.

107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

108) Please provide your reasons, particularly if you disagree.

It appropriately addresses environmental, heritage, health and aviation safety impacts, including cumulative effects, and recognises the need to control noise, dust and vibration while acknowledging the operational realities of mineral extraction. The requirement for restoration and aftercare to high environmental standards is also welcome.

However, some elements would benefit from greater clarity. The phrase “unacceptable adverse impact” is open to interpretation and could lead to inconsistent decision-making. The restriction of financial guarantees to exceptional circumstances may reduce certainty that sites will be fully restored, particularly in more complex cases. Stronger wording on cumulative impact assessment and clearer assurance around restoration would improve confidence in the policy’s effectiveness.

109) Do you agree with approach to coal, oil and gas in policy M5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy M5 introduces a clearer and more restrictive framework for coal extraction and retains a firm position against new or extended peat extraction, which is supported given the environmental and climate implications. The stronger approach to coal aligns with the direction of travel set by the Department for Energy Security and Net Zero and provides greater policy clarity than the previous wording.

However, allowing oil and gas exploration and production within licensed areas maintains a pathway for new fossil fuel development. While the public safety and methane capture exceptions are understandable, the policy could more clearly articulate how decision-makers should weigh climate impacts and carbon budgets when considering proposals.

110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No

No

111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.

Coal extraction should remain limited to the exceptional circumstances already set out in Policy M5, namely public safety and methane capture. Expanding the range of exceptions would risk undermining the policy's intent to significantly restrict new coal development and align with wider climate and decarbonisation objectives supported by the Department for Energy Security and Net Zero.

112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The policy could provide greater clarity on how decision-makers should balance safeguarding against other development needs where conflicts arise. The wording "constrain likely or foreseeable future use" may be open to interpretation and could benefit from clearer guidance to ensure consistent application.

113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy M6 broadly clarifies the role of Minerals Consultation Areas by requiring consultation with the mineral planning authority and consideration of the local minerals plan before determining applications.

However, the policy could offer clearer guidance on how safeguarding considerations should be balanced against competing development priorities.

Greater clarity on the relationship between Minerals Consultation Areas and Mineral Safeguarding Areas would also strengthen the policy and assist decision-makers.

114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

115) If not, what further guidance is needed?

Policy L1 provides generally clear and comprehensive guidance on promoting the efficient use of land. It strengthens the emphasis on optimising previously developed land, allocating a range of site sizes, and securing multiple benefits through mixed-use development. The proactive role for local authorities in identifying and assembling land is also welcome.

However, criterion 1(a)(iv) is framed too weakly. Requiring authorities only to consider whether minimum density standards should be set in other parts of the plan area risks inconsistent and cautious application. To ensure effective land use and plan-led certainty, the policy should require local planning authorities to set minimum densities where appropriate, rather than simply consider doing so. Strengthening this wording would better support delivery, optimise land use, and ensure a more consistent national approach.

The consultation document provides an extensive introduction to this chapter (12), setting out why making the best use of land is a fundamental objective of the planning system, meeting the need for housing and other forms of development, while safeguarding and improving the environment. However, there is currently no clear link to green infrastructure or Local Nature Recovery Strategies (LNRS), apart from L1 1(b)(ii), which refers to enabling significant new habitat creation as an example of environmental net gain. This is the first time environmental net gain is mentioned, yet it is not defined, and it is unclear why it is not referenced elsewhere in the Framework.

Consistency of language and terms is required to ensure that land-use policies align with existing strategies and plans, including LNRS and multi-functional green infrastructure approaches. Integrating green infrastructure and nature recovery into land-use policy would make clear that optimising land is not solely about housing or development density but also about delivering environmental benefits for people and nature. Explicitly referencing LNRS, habitat creation, and environmental net gain would ensure that land-use planning supports biodiversity, climate resilience, and the multifunctional benefits of green infrastructure across communities.

116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

While the policy is detailed, some elements may be open to interpretation in practice. Phrases such as “consistent with the overall street scene” and the circumstances in which larger buildings are appropriate could lead to inconsistent application without strong local design codes. In addition, the fixed numerical approach to curtilage development may be overly rigid in some contexts while not sufficiently nuanced in others.

A key concern is that national decision-making policies, including L2 on making effective use of land, do not contain any cross-references to nature, green infrastructure, or wider environmental benefits. Effective land use should not be considered solely in terms of building

footprint or density, but also in the context of delivering multi-functional green infrastructure, habitat creation, and broader environmental gains.

117) Do you agree policy L2 identifies appropriate typologies of development to support intensification? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) If not, what typologies should be added or removed and why?

The policy could be strengthened by explicitly encouraging gentle densification through small-scale subdivisions of larger plots and conversion of larger single-family homes into multiple units where appropriate. Conversely, typologies that could lead to overdevelopment or harm local character, such as excessive rooftop extensions or infill that ignores local context, needs clearer safeguards.

118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Some elements are too general and may be open to inconsistent interpretation. Terms like “consistent with the overall street scene” and the allowance for larger buildings at corners could result in variable application without stronger national benchmarks. The curtilage footprint and non-developed area thresholds are helpful, but the policy could better acknowledge that flexibility may sometimes be needed to reflect site-specific constraints or opportunities.

119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The policy could be clearer on how decision-makers should balance the benefits of distinctive or taller development against potential impacts on local character and neighbouring properties. Without stronger guidance, interpretation could vary between areas, leading to inconsistent application. More explicit criteria or examples would help ensure that departures from the existing street scene are both appropriate and well-integrated.

120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Whilst we are supportive in principle, the approach may be too rigid in some circumstances, restricting flexibility where site-specific factors could allow for slightly larger or differently configured development without harming character or amenity. The policy could be strengthened by allowing decision-makers to apply discretion based on local context, design quality, and infrastructure capacity.

121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) If not, please explain how guidance could be clearer?

Policy L3 provides generally clear guidance on achieving appropriate densities and appropriately emphasises efficient use of land, connectivity, and well-designed, attractive, and healthy places. Setting minimum densities near stations and promoting higher densities in settlements supports sustainable growth and the focus on connectivity and infrastructure will help to direct development to locations where it can be most effective.

However, the expectation that development within settlements should always increase density may not be appropriate in areas that are already densely developed or where further intensification could harm local character, amenity, or infrastructure capacity.

Similarly, applying minimum densities of 40 or 50 dwellings per hectare near stations should not be automatic, as some sites may be inherently sensitive due to conservation, heritage, environmental, or local context considerations. The policy would be clearer and more flexible if it recognised that minimum density targets are a guide rather than a mandatory requirement in all circumstances, allowing decision-makers to account for site-specific constraints and local sensitivities.

122) Do you agree with the minimum density requirements set out within policy L3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The minimum density requirements in policy L3 provide useful guidance for directing growth to well-connected locations and making efficient use of land near railway stations.

However, setting 40 or 50 dwellings per hectare as automatic minimums may not be appropriate in all cases. Some sites near stations may be sensitive due to heritage, conservation, environmental constraints, or local amenity considerations. Applying these minimums rigidly could risk overdevelopment or harm the character of existing communities. The policy would be improved by emphasising that these densities are indicative targets only and that decision-

makers should consider site-specific circumstances and local sensitivities when applying them.

b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence

Rigid application could reduce flexibility for providing accessible homes for older people, disabled people, or families requiring adaptable layouts, as higher-density schemes prioritise smaller units to meet numerical targets. High-density urban development can sometimes restrict space for community facilities, private amenity areas, and safe access, which are critical for these groups.

123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of ‘net developable area’ within the NPPF suitable for this policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

DPH is generally an appropriate and widely understood metric for setting minimum density requirements, aligning with established planning practice.

However, DPH alone may not fully capture site-specific considerations, such as the need for larger plots for Gypsies and Travellers, accessible housing, or sensitive development near heritage or environmental assets and there is a concern that over-reliance on this metric could lead to overdevelopment or constrain flexibility.

The definition of “net developable area” is broadly suitable and provides useful clarity by including access, gardens, parking, and incidental open space. It may be too prescriptive in some contexts where local variations in site layout, communal facilities, or other non-standard housing types need to be accommodated. Greater acknowledgement that the net developable area may need to be applied flexibly in certain cases should be considered.

124) Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons and preferred alternatives.

Using Travel to Work Areas and service frequency provides an evidence-based method for identifying stations with strong connectivity to employment and services.

However, the parameters may be too rigid in some cases. Limiting well-connected stations to the top 60 Travel to Work Areas may exclude smaller urban or suburban stations that could support higher densities, while service frequency thresholds may not fully reflect the potential for multimodal transport, such as buses, trams, or cycling infrastructure.

Some stations with lower service frequency may still be suitable for densification if supported by other sustainable transport options.

A more flexible approach could combine service frequency with overall accessibility, including walking, cycling, and local public transport links, and allow local planning authorities to identify additional sites where higher densities are appropriate. This would better reflect real-world connectivity and local circumstances while still targeting growth in sustainable locations.

125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? Yes/No

Yes.

a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?

Minimum density standards could also be applied to urban cores and other high-quality public transport nodes such as major bus hubs or metro/light rail stops.

These locations could be defined using clear, measurable criteria, for example: areas within a defined radius (e.g., 400–800 meters) of key public transport hubs, or within areas designated as town centres, city centres, or identified growth areas in local plans.

Density standards could vary depending on the location type and connectivity. For urban cores with high accessibility, a minimum of 60–80 dwellings per hectare could be appropriate, while for other well-connected transport nodes, 40–50 dwellings per hectare could remain the minimum.

If such an approach were to be taken forward it would be essential to retain flexibility to account for site-specific constraints, heritage sensitivities, and local character.

126) Should we define a specific range of residential densities for land around stations classified as ‘well-connected’?

Yes

127) If so, what should that range be, and which locations should it apply to?

A specific range of residential densities would provide clearer guidance while allowing flexibility to respond to local circumstances. For land around stations classified as “well-connected,” a range of 50–80 dwellings per hectare could be appropriate.

This range should apply to sites within a reasonable walking distance of the station (typically 400–800 meters) and surrounding areas identified in local plans as suitable for higher-density development.

Flexibility should be maintained to allow local planning authorities to adjust densities based on site-specific constraints and conditions, infrastructure capacity, and wider planning objectives.

128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

129) Please provide your reasons, particularly if you disagree.

The guidance is very high-level and may be too general to provide practical clarity in all cases. Terms like “blend effectively” and “acceptable living standards” are open to interpretation, which could lead to inconsistent application between authorities. The policy would be strengthened by including reference to proportion, materials, rooflines, and impact on neighbouring properties, while still leaving scope for local design codes to provide more detailed guidance.

130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

131) Please provide your reasons, particularly if you disagree.

The policy could be strengthened by clarifying which tier of plan-making should consider proposals for new Green Belts. It would be helpful to specify that sub-regional or strategic plans, such as Spatial Development Strategies (SDSs), are the appropriate level to assess the need for new Green Belts. This would provide greater consistency, strategic oversight, and alignment with wider growth planning objectives.

132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

Policy GB2 provides clear and detailed guidance on the respective roles of spatial development strategies and local plans in assessing Green Belt land. It appropriately distinguishes between the strategic assessment undertaken at the SDS level and the more detailed local plan assessment, following the process set out in Annex E.

133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

a) Please provide your reasons, particularly if you disagree.

The proposed approach creates an inappropriate presumption that land near stations should be released from the Green Belt. Proximity to a station alone should not justify altering Green Belt boundaries, as this could lead to excessive development pressure, undermine the fundamental purposes of the Green Belt, and threaten the character and openness of surrounding areas.

Green Belt release should remain strictly limited to cases of fully evidenced exceptional circumstances, with all other reasonable options for meeting development needs considered first. Using station proximity as a primary justification risks circumventing these safeguards and could encourage speculative development in areas that are otherwise strategically important to protect. The policy should be amended to make it clear that station location is only one consideration and does not automatically create a case for boundary alteration.

134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

135) Please provide your reasons, particularly if you disagree.

Policy GB5 sets out positive expectations for maximising the benefits of Green Belt land for communities and nature, including improving public access, supporting Local Nature Recovery Strategies (LNRS), and contributing to National Forest and protected landscape objectives. The emphasis on compensatory improvements when land is removed from the Green Belt is also welcome and aligns with principles of sustainable and balanced development.

However, some aspects of the policy may be challenging to deliver consistently through Local Plans. Identifying and implementing compensatory improvements, contributions to nature recovery strategies, and support for multiple environmental objectives can be resource-intensive and complex, particularly for smaller authorities or where multiple stakeholders are involved.

References to nature recovery and LNRS in GB5 (1b) are welcomed. However, the policy should also explicitly include natural flood management as a potential benefit of Green Belt land. Integrating natural flood management measures would deliver multiple advantages, including climate resilience, improved water quality, habitat creation, and enhanced ecosystem services, while contributing to community and environmental objectives. Explicitly recognising these benefits would strengthen the policy and better reflect the multifunctional value of Green Belt land.

136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policies GB6 and GB7 provide a structured and generally clear framework for assessing development in the Green Belt. The clarification of categories adds clarity and aligns with sustainable development objectives.

However, there are significant concerns with GB7(1h) and the emphasis on development near well-connected stations. While promoting sustainable, transport-oriented development is important, the policy risks creating a presumption in favour of Green Belt release near stations. This could place excessive development pressure on Green Belt land, undermining its fundamental purposes and the openness of surrounding areas.

The tests for non-inappropriate development should make it clear that proximity to a station alone is not sufficient justification and that exceptional circumstances and careful assessment of Green Belt harm remain essential. Strengthening these safeguards would ensure the policies protect Green Belt purposes while enabling sustainable growth.

137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly disagree.

138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.

We have concerns that this aspect of the policy is overly prescriptive and risks placing undue pressure on Green Belt land. Applying it automatically to housing and mixed-use development that meets the density requirements in chapter 12 could incentivise the release of Green Belt for sites that are not otherwise suitable, potentially undermining Green Belt purposes and local character. Proximity to a station should be one factor among many, rather than a primary justification for development.

139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Allowing site-specific viability assessments in the three limited circumstances set out in GB8 is generally appropriate, as it provides a degree of flexibility for previously developed land, multi-phase strategic sites, or proposals differing from assumptions in the development plan.

However, there is a risk that even these limited exceptions could be applied too broadly, undermining the delivery of the policy's objectives, particularly the high levels of affordable housing, green space, and infrastructure contributions expected from Green Belt development. The policy could be strengthened by specifying transparent thresholds or reporting requirements for viability assessments to ensure consistency and accountability in how adjustments to contributions are made.

In addition, the Golden Rules should be amended to include explicit reference to supporting nature recovery in 1(c)(ii). Incorporating nature recovery alongside other contributions would ensure that Green Belt development helps deliver wider environmental benefits, in line with the priorities identified in Local Nature Recovery Strategies (LNRS). Including such references would provide clearer guidance for developers and local authorities, helping to align viability assessments with the delivery of both social and environmental objectives.

140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?

No.

141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?

An affordable housing floor is essential to ensure that developments on Green Belt land deliver meaningful community benefits, particularly where viability assessments might otherwise reduce contributions. Without a floor, there is a risk that some sites could come forward with minimal or no affordable housing, undermining the purpose of the Golden Rules.

Whilst a nationally set floor provides clarity, consistency, and a strong safeguard against low contributions, a locally calibrated floor may be more appropriate in areas with higher housing need, different market conditions, or specific policy targets in place. A hybrid approach could potentially work well such as a national minimum (e.g., 10–15% social or affordable housing) to ensure a baseline, with the ability for local plans to set higher floors where justified by local circumstances and housing need.

143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please explain your answer.

Testing viability at the plan-making stage using a standardised benchmark land value of 10 times Existing Use Value (EUV) for greenfield Green Belt land could provide useful clarity and consistency for local planning authorities.

However, a fixed national benchmark risks oversimplifying local market conditions. Land values can vary widely and a uniform multiple may not reflect differences in local demand, infrastructure costs, or abnormal development costs.

A more flexible approach could be to use the 10x EUV benchmark as a starting point, but allow local authorities to adjust it based on robust evidence of local land values, infrastructure costs, and market conditions. This would provide the benefits of clarity while retaining sensitivity to local circumstances.

144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

BLVs should be framed as indicative guidance rather than prescriptive, allowing local planning authorities to adjust values based on robust local evidence. This approach would give plan-makers clarity and confidence when testing viability, while avoiding the risk of discouraging landowners from bringing forward sites or undermining plan delivery.

145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

There is a risk that decoupling grey belt from Footnote 7 protections could create confusion about how these areas interact with other nationally important designations, particularly in sensitive landscapes or where multiple policy layers apply. The policy should make explicit that grey belt designation does not reduce protections already afforded to sites covered by Footnote 7, to ensure decision-makers retain clear guidance and avoid unintended gaps in safeguarding.

146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy DP1 provides clear guidance on how development plans should embed high-quality design and placemaking outcomes and links design strategy to areas of change, significant site allocations, and broader plan visions, which should help to support consistent decision-making.

However, there are concerns about the resource implications for local planning authorities. Implementing detailed design guides, codes, and masterplans, particularly for multiple significant sites or areas of change, could place a substantial administrative and financial burden on smaller authorities.

Additional support, guidance, or phased implementation is needed to ensure LPAs can realistically deliver these outcomes without compromising other statutory responsibilities or delaying plan preparation.

147) Do you agree with the approach to design tools set out in policy DP2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy DP2 provides a clear and structured approach. The inclusion of monitoring and review expectations is welcome, as it encourages adaptive management and ensures design tools remain relevant over time.

However, there are concerns about the resource and capacity implications for local planning authorities. Producing, implementing, and maintaining these design tools, especially with meaningful community engagement and monitoring, requires significant staff time, expertise, and funding.

Some authorities may struggle to meet these expectations without additional support, which could affect the timely delivery of plans and the quality of the outputs.

148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy DP3 sets out a comprehensive and well-structured framework, and the inclusion of climate change mitigation and adaptation, net zero transition, and green infrastructure is particularly welcome as a positive and necessary update, aligning design expectations with sustainability objectives. The policy also appropriately retains the principle that poorly designed development should be refused and gives weight to innovative proposals.

However, we have some concerns about practical implementation for local planning authorities. The breadth and level of detail expected—particularly in considering climate,

nature, and movement alongside all other design features—could create significant resource pressures for some authorities. Clearer guidance on prioritisation and proportionality, especially for smaller-scale developments, would help ensure the policy is both effective and deliverable.

We welcome the inclusion of a key principle on nature (1d), which requires development proposals to incorporate and/or connect to a network of high-quality, accessible, and multi-functional green infrastructure. However, the policy does not explicitly refer to nature recovery or species and only includes the need to “strengthen habitats” a term that is unclear and the first instance of its use. This could be strengthened by changing the wording to “creating, restoring, and enhancing habitats and features for species,” which would provide a clearer focus on biodiversity outcomes.

The policy rightly includes specific mention of maintaining and enhancing tree cover and incorporating Sustainable Drainage Systems (SUDS) in accordance with policies NE3 and F8. While trees are important, they would have a greater role in nature recovery when considered as part of broader habitat types, including woodlands, orchards, scrub, and hedgerows, especially where these form connected networks linking ponds, species-rich grasslands, and other habitats.

Although connectivity is briefly mentioned, it should be a more fundamental principle. Local Nature Recovery Strategies (LNRS) identify priority networks of habitats and supporting priority species such as house sparrows, toads, and hedgehogs, and the policy should explicitly reflect this.

Finally, the current framing places too much emphasis on the benefits that nature provides to humans. The principle should instead prioritise nature recovery - ensuring that habitats and species features are incorporated within multi-functional green infrastructure - with human benefits recognised as a positive outcome rather than the primary driver.

This approach would better align with climate adaptation and mitigation objectives, ensuring that development contributes meaningfully to ecological resilience while also delivering social and environmental co-benefits.

149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) If not, what else would help secure better design and placemaking outcomes?

Policy DP4 provides a strong framework for embedding design quality throughout the planning process. However, there are several potential drawbacks. Beyond resourcing, smaller authorities may lack access to skilled design reviewers or panels with the right expertise, particularly for complex or mixed-use schemes, which could reduce the effectiveness of design review.

The policy could also increase delays in the planning process, as formal design reviews and iterative pre-application engagement add time to decision-making.

There is also a risk of inconsistencies in outcomes if local authorities interpret the policy differently or apply it disproportionately across projects of varying scale.

Furthermore, while the policy expects development quality to be maintained between approval and completion, enforcement mechanisms are not clearly specified.

Clarifying proportionality thresholds, providing guidance on consistent application, and establishing clearer mechanisms to maintain approved design standards would therefore assist.

150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy TR1 provides a strong foundation for embedding sustainable transport early in plan-making and promoting a vision-led approach.

However, there are some potential drawbacks. Early engagement with multiple stakeholders could slow down plan preparation and may be challenging for smaller authorities with limited resources. Relying heavily on the Connectivity Tool perhaps also risks oversimplifying local transport realities, e.g. in areas with complex travel patterns or where data is incomplete.

The policy could also be clearer on how thresholds for “significant movement” will be applied consistently.

151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy TR2 is generally sensible in requiring local parking standards while allowing flexibility and promoting sustainable transport. The emphasis on connectivity, optimising development density, and accommodating future mobility needs such as EV charging, cycles, and e-scooters is positive.

However, the policy is currently open to interpretation regarding when maximum car parking standards will be applied. This lack of clarity could lead to inconsistent application across sites, uncertainty for developers, and challenges for local authorities in decision-making. The allowance to consider specific business requirements is helpful but could benefit from clearer guidance on how to balance competing objectives, for example between high-density development and adequate commercial parking.

Furthermore, the policy does not explicitly address how standards should be monitored or reviewed over time to respond to changes in travel patterns or new transport technologies.

152) Do you agree with the changes proposed in policy TR3 (1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The explicit reference to the Connectivity Tool is positive, as it provides a structured method for assessing how well locations are connected to transport options. Including “wheeling” improves inclusivity and ensures active travel assessments consider a wider range of mobility needs.

However, the policy remains open to interpretation in key areas. For example, the phrase “significant amount of movement in the context of the area” is not fully defined and could lead to inconsistent application across planning authorities. It is also unclear at what threshold or scale of movement the policy should apply, and whether different types of uses, such as residential, commercial, or mixed-use developments, should be treated differently. Similarly, while the Connectivity Tool is useful, reliance on a single tool without guidance on how to weigh its outputs against local circumstances may create uncertainty for developers and decision-makers.

A key omission is the explicit consideration of nature recovery and biodiversity in relation to transport infrastructure. TR3 (1c) refers to the environmental impacts of traffic and transport infrastructure, and securing net environmental gains such as reductions in air pollution, but it does not reference the opportunity to enhance habitats or support wildlife.

New roads, footpaths, and cycleways provide opportunities to create or restore habitats, strengthen wildlife corridors, and improve habitat connectivity. Measures such as sensitive lighting, species-rich planting, and tree planting not only reduce air pollution but also support biodiversity and contribute to Local Nature Recovery Strategies (LNRS).

153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The policy does not explicitly address how conflicts between competing objectives such as denser development, provision of public transport infrastructure, and safe, low-traffic streets should be managed.

There is also limited guidance on balancing on-site parking requirements with sustainable transport objectives, particularly in areas where local standards are flexible or subject to interpretation.

The wording on accommodating service and emergency vehicles could also create uncertainty about what constitutes “efficient delivery” without compromising placemaking.

154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

The policy provides clear guidance for approving new, expanded, or upgraded roadside facilities based on evidenced need.

155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

TR6 is considered to provide a clear and proportionate framework for when transport assessments, statements, and travel plans are required and is therefore welcome.

156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

TR7 provides a robust framework for supporting the modernisation and diversification of marine ports, airports, and other aviation facilities, but some concern arises with regard to criterion (d).

The current wording could be misinterpreted as setting an absolute environmental standard, whereas it would be clearer and more consistent with planning practice to require proposals to demonstrate that they do not have an unacceptable environmental impact (e.g. in terms of noise, air quality, carbon emissions, transport networks, landscape, visual, and marine effects).

157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

Policy TR8 provides clear guidance on maintaining and enhancing public rights of way. The emphasis on connectivity will help to support accessibility, active travel, and sustainable transport and is therefore welcome.

However, similar to TR3, there is an important opportunity to integrate nature recovery into these developments. The creation of new footpaths to improve access to green space and the countryside should also be designed to incorporate or make significant contributions towards habitat creation, restoration, and ecological connectivity. Without explicit requirements, such opportunities are often missed unless picked up during the planning application stage or tied to project funding. A more holistic approach should be encouraged, ensuring that climate and nature considerations become an integral part of public rights of way improvements, delivering benefits for both people and wildlife.

158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

Policy HC1 provides a clear and comprehensive framework, and it is particularly welcome that it requires development plans to set local quantitative standards for outdoor recreational land based on national benchmarks. This approach will help to ensure that development contributes appropriately to health and wellbeing, supports social interaction, and addresses local needs while giving certainty to both developers and communities.

However, the policy does not explicitly reference the health and wellbeing benefits of access to nature. While local green spaces are mentioned, there is no specific reference to the natural environment, including trees, woodlands, species-rich grasslands, or natural play areas. We would advocate for explicit mention of natural green spaces to strengthen the link between physical and mental wellbeing and exposure to biodiverse environments.

These benefits are well-established, and the connection with nature should be given greater emphasis. The design of new urban spaces and green infrastructure should aim to create attractive, accessible, and welcoming environments for both people and wildlife, incorporating principles of biophilic design to maximise health, social, and ecological outcomes.

159) Do you agree that Local Green Space should be 'close' to the community it serves? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

Local Green Space should be in close proximity to the community it serves to ensure it is accessible, usable, and genuinely contributes to the health, wellbeing, and recreational needs of local residents.

The mention of the “richness of its wildlife” is welcomed with regard to Local Green Spaces. However, terminology should be consistent throughout the Framework, and it would be preferable to reference biodiversity or ecological value explicitly. These spaces should also be linked with Local Nature Recovery Strategies (LNRS) opportunities for nature recovery.

Local Green Spaces provide an important opportunity to create, enhance, or restore habitats and deliver features for priority species such as hedgehogs and common toads, ensuring that development contributes both to community wellbeing and local ecological networks.

160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

The policies HC3 and HC4 provide a clear and comprehensive framework to ensure that new development is accompanied by the community facilities and public service infrastructure needed.

161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term ‘fast food outlets’, and the types of uses to which it applies?

Further clarity would be helpful to ensure consistent application of this policy.

In particular, the term “fast food outlets” would benefit from a clearer definition. At present, it could be interpreted inconsistently, potentially capturing a wide range of premises beyond traditional hot food takeaways (for example cafés, sandwich shops, convenience stores with hot counters, or mixed-use premises).

Clear alignment with use classes, or a glossary definition distinguishing between primary takeaway uses and ancillary hot food sales, would provide greater certainty for applicants and decision-makers.

Similarly, the phrase “reasonable walking distance” would benefit from guidance or indicative parameters (for example, a defined distance range, walking time, or reference to local plan standards), as what is considered reasonable may vary significantly between urban and rural areas.

162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy HC6 provides a clear and proportionate framework for protecting valued community facilities and public service infrastructure, and the requirement to demonstrate lack of viability or provide equivalent replacement provision is welcome. The inclusion of a marketing requirement for shops and public houses adds transparency and consistency, helping ensure that facilities are not lost prematurely without proper evidence.

This approach reflects established practice in many areas, including West Oxfordshire District Council, which has for many years adopted similar protective policies through successive Local Plans.

However, there are concerns regarding the restriction of the policy to facilities that are the “last of their type” in an area. While this aims to avoid overly restrictive outcomes, it may unintentionally allow the gradual erosion of community infrastructure where more than one facility exists but overall provision is already limited or under pressure. In some locations, the loss of one of only two similar facilities could materially undermine accessibility, choice, community cohesion, or the viability of the remaining service.

Consideration could therefore be given to allowing local planning authorities limited discretion to protect facilities that, while not strictly the last of their type, are demonstrably important to local wellbeing or serve distinct catchments.

163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

Policy HC7 strengthens protection for open space, sports and recreational land, and the explicit inclusion of formal and informal play space and allotments is welcome.

However, there are concerns regarding the introduction of “and/or” in relation to replacement provision in terms of quantity and quality. While flexibility is understandable, the revised wording could allow a reduction in overall quantity to be justified solely on the basis of qualitative improvements.

This may risk incremental erosion of recreational land, particularly in areas already experiencing pressure from development. Quality improvements, while valuable, may not fully compensate for a reduction in accessible space, especially where population growth is increasing demand.

Greater clarity would be helpful to ensure that flexibility does not lead to a net loss of usable recreational capacity, particularly in quantitative terms.

164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

No comment.

165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

We are broadly supportive of the overarching aims of policy P1 and agree that development plans should provide a clear framework.

However, there are concerns regarding the practical implications and resource demands associated with some of the specific requirements, particularly where they expect detailed technical work to be undertaken at plan-making stage. For example, the expectation to identify areas where ground conditions may inhibit or affect development could require extensive and costly site investigations across wide areas, which may not be proportionate or feasible for all authorities, especially where such matters are more appropriately and effectively addressed through site-specific assessment at the planning application stage.

Similarly, identifying and reflecting multiple consultation and safeguarding zones, and assessing land requirements for public safety and security infrastructure, could place significant additional burdens on plan-making teams, with implications for timescales and viability of plan preparation. Greater clarity on proportionality, the level of evidence expected, and how these requirements should align with existing statutory consultation processes would help ensure that the policy is deliverable in practice without placing undue strain on local authority resources.

We welcome the mention of nature-based solutions in P1 (1c) in relation to wider opportunities for reducing air, water, soil, and noise pollution. This could be strengthened by explicitly linking these solutions to Local Nature Recovery Strategies (LNRS), helping to ensure that nature-based approaches deliver multiple benefits, including habitat creation, species support, climate resilience, and broader environmental improvements alongside pollution mitigation.

166) Are any additional tools or guidance needed to enable better decision-making on contaminated land?

Additional practical tools and guidance would assist in supporting more consistent and effective decision-making on contaminated land.

In particular, clearer national guidance on the level and type of site investigation information expected at different stages of the planning process would be beneficial. While the requirement

for information prepared by a competent person is supported, further clarity on proportionality, especially for smaller sites, would help avoid unnecessary delay or cost while ensuring risks are properly addressed.

There may also be merit in strengthening access to up-to-date, standardised datasets on historic land uses, landfill sites, mining legacy areas and other potential contamination sources, so that plan-makers and decision-makers can more readily identify areas of risk. Improved digital mapping tools and model planning conditions or obligations relating to remediation and verification could further promote consistency across authorities.

167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

We are generally supportive of the criteria set out in policy P3 and agree that it provides a comprehensive and structured basis for securing acceptable living conditions and managing different forms of pollution. The explicit reference to daylight and sunlight, air quality (including PM2.5), noise, artificial light, and water quality is welcomed and reflects the importance of protecting both human health and the natural environment.

However, there are concerns regarding how some elements of the policy will operate in practice. The breadth of matters to be assessed, particularly in relation to cumulative impacts and compliance with multiple national targets and plans, may result in significant evidential and viability burdens, especially for smaller sites. Greater clarity on proportionality and the level of technical assessment expected in different circumstances would help ensure the policy is deliverable without unduly constraining development.

In addition, care will be needed to ensure that the requirements do not duplicate or cut across existing environmental permitting and regulatory regimes. We particularly welcome the reference to limiting adverse impacts from artificial light on nature in P3 (2d).

This is an important recognition that light pollution can have significant effects on biodiversity, and it should be reinforced and integrated with broader nature recovery measures, such as the creation and protection of habitats identified in Local Nature Recovery Strategies (LNRS).

168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

We support the strengthening of policy P4 and welcome the clearer articulation of the agent of change principle. The explicit reference to both current and permitted levels of operation is particularly helpful, as is the expanded list of activities that may be affected, such as emergency services, defence, industrial and waste sites.

However, while the policy is clearer in intent, further guidance may be needed to ensure consistent application in practice. In particular, clarity around what constitutes “unreasonable restrictions” and how decision-makers should balance competing objectives would be beneficial.

There is also a risk that evidential requirements and mitigation expectations could become onerous, particularly for smaller schemes or in complex mixed-use developments.

169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

We support the intention behind policy P5 and agree that it provides a clearer and more structured basis for ensuring that public safety and security considerations are addressed at the application stage. The explicit reference to consultation zones around hazardous installations, nuclear sites, aerodromes and technical sites is helpful.

However, while the policy is comprehensive, there are practical considerations that warrant attention. The expectation that proposals be informed by the “most up-to-date information” from the police and other agencies may present challenges in terms of access to sensitive information, consistency of advice, and potential delays to decision-making.

Clear guidance on proportionality, particularly for smaller-scale development and how confidential or security-sensitive matters should be handled would be beneficial.

In addition, care will be needed to ensure that requirements do not duplicate existing regulatory and licensing regimes.

170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

We support the approach in policy P6, which recognises the national importance of land and operations for defence and public protection. Giving substantial weight to proposals that maintain or enhance defence capability or public safety is particularly relevant to West

Oxfordshire, where RAF Brize Norton plays a critical role in national defence and operational readiness.

The policy sensibly requires consideration of the impact of development on existing operational activity, including noise and other potential conflicts. Cross-referencing policy P4 will help to ensure that the agent of change principle is applied, which should in turn, help to protect both the operational capability of facilities like RAF Brize Norton and the amenity of new development in surrounding areas.

171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

Whilst not of direct relevance to West Oxfordshire, we welcome the strengthened approach in policy F3 to managing coastal change. The clear requirement to designate Coastal Change Management Areas, consider estuaries and tidal rivers, and take a 100-year view aligns well with best practice for long-term risk management. Referring to Shoreline Management Plans, the National Coastal Erosion Risk Map, and the UK Marine Policy Statement will help to provide a robust evidence base for plan-making, and the emphasis on Integrated Coastal Zone Management should ensure that terrestrial and marine planning are effectively aligned.

We also welcome the reference to green infrastructure and natural flood management techniques in policy F2 (1c). However, the policy does not explicitly reference nature-based solutions, which are included elsewhere in the document. Consistency of language and terminology is important to ensure clarity and to emphasise the role of nature-based approaches in flood risk management, habitat creation, and wider environmental benefits. Explicit inclusion of nature-based solutions here would align the policies on flood risk with broader objectives on climate adaptation, biodiversity, and multi-functional green infrastructure.

172) Do you agree with the proposed clarifications to the sequential test set out in policy F5? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

We welcome the clarifications in policy F5 on the sequential test, particularly the recognition that a site-specific flood risk assessment can demonstrate that development would be safe even in areas potentially at risk from surface water flooding. The clarification that the test should be applied based on the anticipated catchment of the development is also helpful for ensuring proportionality.

173) Do you agree with the proposed approach to the exception test set out in policy F6?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree

We support the approach in policy F6, particularly the clear linkage between flood zones, the sequential test (policy F5), and the exception test criteria. The inclusion of Annex F tables provides greater clarity on which development types are considered incompatible with flood risk.

We also welcome the clarification that the exception test does not need to be re-applied on allocated sites unless there has been a significant increase in flood risk or a more vulnerable use is proposed.

174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

We welcome the requirement for Sustainable Drainage Systems (SuDS) to be designed in accordance with the National Standards. This is a key consideration for West Oxfordshire and a recurring issue highlighted by respondents in local planning matters. Ensuring consistency and long-term resilience in managing surface water is essential, particularly given local concerns about flooding and drainage.

The policy's emphasis on multifunctional benefits is particularly welcome, as are the clear expectations for maintenance arrangements and the protection or re-naturalisation of watercourses where feasible.

With regard to consistency of language and terminology, this section refers to biodiversity rather than using broader terms such as nature, nature recovery, wildlife, or habitats. Ideally, the Framework should consistently use the term nature and explicitly link to nature recovery and Local Nature Recovery Strategies (LNRS) wherever relevant. This would ensure that SuDS are not only delivering drainage and flood mitigation benefits but also contributing to wider environmental objectives, including habitat creation, ecological connectivity, and long-term resilience for local wildlife.

Further, F8 (1) refers to facilitating improvements in water quality, biodiversity, and amenity as part of multifunctional benefits associated with the systems employed "wherever possible." We consider this wording too weak. In practice, there are very few scenarios where SuDS could not be designed to provide multifunctional benefits, and in most cases, these should be treated as clear objectives rather than optional enhancements. Allowing "wherever possible" risks giving developers the flexibility to reduce the ecological, water quality, and amenity value of SuDS.

Strengthening this language would ensure that multifunctional benefits - particularly nature recovery, habitat creation, and biodiversity gains - are systematically delivered as an integral part of SuDS design, rather than an optional add-on.

175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

We fully support the proposed policy to avoid the enclosure of watercourses and to encourage de-culverting and re-naturalisation of river channels. This is particularly important for West Oxfordshire, where flooding and surface water management are recurring issues raised by local communities and stakeholders. Retaining and restoring natural river channels not only reduces flood risk, but also enhances biodiversity, landscape character, and public amenity.

The re-naturalisation of river channels is strongly welcomed. However, the current wording uses the phrase “where possible,” which is too broad and could allow opportunities for restoration to be overlooked.

The emphasis should be on achieving re-naturalisation unless there is clear justification that it is not appropriate or not achievable. This more precise framing would ensure that ecological, flood mitigation, and amenity benefits are delivered consistently, while retaining flexibility only in exceptional circumstances.

176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

We support the proposed policy F9 on development in Coastal Change Management Areas. The clearer emphasis on avoiding permanent new residential development and aligning proposals with Shoreline Management Plans and the national coastal erosion risk map should help to prevent inappropriate development in areas at risk.

177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?

A proportionate approach should take account of both the likelihood and timescale of risk indicated by the National Coastal Erosion Risk Map, so that development decisions are focused on genuinely at-risk areas rather than applying the policy too rigidly.

Prioritise short- to medium-term risk areas where erosion or flooding is likely within the expected lifetime of the development, ensuring that proposals are safe over their planned use.

More vulnerable uses should be assessed against all risk scenarios, whereas less vulnerable or temporary uses may be acceptable in lower-probability risk areas, with mitigation or time-limited permissions.

178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.

We strongly support the proposed updates as they will help provide additional clarity and consistency in assessing flood risk across different development types. The inclusion of essential infrastructure such as hydrogen production, carbon capture, data centres, and EV charging stations is particularly welcome, reflecting the growing importance of low-carbon and strategic energy infrastructure.

We also encourage consideration of any additional emerging uses or climate adaptation measures that may require essential infrastructure status in the future, such as battery storage facilities, and water re-use or treatment plants. This would help maintain Annex F as a forward-looking, adaptable framework.

179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council strongly support Policy N1's approach to safeguarding and enhancing the natural environment. By using Local Nature Recovery Strategies and other evidence, it will help to ensure that development is guided by local ecological priorities while protecting sensitive sites.

The policy helpfully emphasises habitat restoration, ecological networks, and nature-based solutions, alongside clear green infrastructure standards.

We are particularly supportive of the proposal to allow higher biodiversity net gain targets where fully justified and deliverable for specific sites. This encourages meaningful environmental improvements and reflects practical examples such as the recently adopted Salt Cross Area Action Plan which includes a 25% BNG target.

180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

It is important to recognise that seeking biodiversity net gain above 10% should be focused on delivering meaningful benefits for nature recovery. While it may be technically possible for development sites to sell excess biodiversity units to other sites, this would generally only result in habitats that can tolerate high levels of human disturbance, such as areas affected by traffic, dogs, or general urban activity. True off-site provision should instead prioritise the creation or restoration of high-quality habitats in the countryside, where higher distinctiveness and condition can be achieved over the longer term, for example through priority habitats such as lowland meadows. This approach would make a more significant contribution to nature recovery targets, the strategic objectives of Local Nature Recovery Strategies, and the establishment of habitat banks. Sharing BNG provision between development sites could reduce overall contributions to these wider environmental goals. Nevertheless, off-site trading could be reasonable in areas where habitat banks are unavailable or where specific habitat types cannot be provided on-site, although the market for such arrangements is still developing.

181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The policy provides a strong framework for ensuring development contributes positively to the natural environment, including consideration of landscape character, habitats, and biodiversity.

The explicit inclusion of existing natural features such as hedgerows is welcome, as is the requirement to incorporate features for priority species. However, some aspects could be clarified or broadened to improve effectiveness.

The phrase “wherever possible” in relation to conserving and enhancing existing natural features is quite broad and could reduce the policy’s impact. A clearer approach, such as the wording in the current NPPF paragraph 187, would better ensure valued landscapes, biodiversity sites, and soils are protected and enhanced in line with their statutory or locally identified importance.

The reference to species such as swifts, bats, and hedgehogs is welcomed, but more inclusive wording, for example “including birds, bats, amphibians, reptiles, and mammals such as hedgehogs,” would capture a wider range of priority species.

Similarly, while the requirement for “integrated nest boxes” is supported, describing them solely as “swift bricks” is too narrow. The policy would be strengthened by using a broader term such as “integrated wildlife boxes,” which could include bat boxes, bee bricks, and boxes suitable for other priority birds such as house sparrows and starlings, reflecting multiple species benefits.

The policy currently lacks support for development focused on nature recovery, such as habitat banks, which should be explicitly encouraged to align with Local Nature Recovery Strategies.

Overall, the Council considers the policy a positive step in improving the natural environment, but greater clarity in language, inclusion of more species, and recognition of broader nature recovery initiatives would enhance its effectiveness and deliverability.

182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, including how policy can be improved to ensure compliance.

The policy provides a clear framework for considering development within protected landscapes and reflects the statutory duties introduced by the Levelling Up and Regeneration Act 2023. The emphasis on limiting development scale, sensitive siting, and design, alongside substantial weight being given to conserving and enhancing natural beauty, wildlife, and cultural heritage, is welcomed. The inclusion of mitigation measures and consideration of compensation where significant harm cannot be avoided is also supported.

However, the Council considers that further clarity could be provided on what constitutes “exceptional circumstances” for major development. While the policy lists national need, economic impact, and alternatives outside the designated area, more explicit guidance on the threshold for harm would help ensure consistent decision-making.

The policy could also emphasise the importance of considering cumulative impacts and maintaining the special qualities of landscapes, including tranquillity, dark skies, and recreational value, in both designated areas and their settings.

183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council partly supports Policy N6. The policy provides a clear framework for the treatment of internationally, nationally, and locally recognised sites, and the retention of protections for irreplaceable habitats, including ancient and veteran trees, is welcomed. The inclusion of Environmental Delivery Plans and the nature restoration levy is also supported as a mechanism to secure biodiversity benefits.

However, Policy N6(1)(c) on sites of local importance requires amendment. The current wording allows development to proceed if the benefits clearly outweigh the impact on local sites, without explicitly requiring adequate mitigation or, as a last resort, compensation. This could result in a net loss of biodiversity, particularly where indirect impacts on adjacent sites occur. It is recommended that the policy be revised to ensure mitigation and/or compensation is

required wherever a local site is affected. The “or” between (i) and (ii) should be replaced with “and” to reflect this.

The Council also recommends extending protections for irreplaceable habitats to include ancient meadows and grasslands, alongside ancient and veteran trees, to better support nature recovery and biodiversity objectives.

184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?

While Environmental Delivery Plans (EDPs) can provide a useful strategic framework, there are important considerations to ensure they are implemented effectively. Local aspirations for the protection of wildlife, habitats, and ecological features may not always align with EDPs in the future.

EDPs should therefore focus on strategic environmental issues, such as addressing diffuse pollution or providing Habitats Regulations Assessment (HRA) mitigation for recreational pressure and other impacts, rather than prescribing measures for individual species or habitat types.

EDPs may be appropriate for species such as great crested newts, where district licensing approaches already exist. The District Council holds a great crested newt organisational licence as part of the NatureSpace Partnership’s District Licensing Scheme, and the specific design and implementation of this approach is valued.

Any EDP for species must fully incorporate the mitigation hierarchy to ensure local populations are maintained, on-site mitigation is effective, and genetic diversity is preserved.

185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons.

West Oxfordshire District Council supports the implementation of the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act. These duties provide clarity and strengthen the statutory framework for decision-making in relation to protected landscapes, ensuring that relevant authorities actively seek to further the purposes of these areas when exercising their functions.

Implementing these duties reinforces the importance of conserving and enhancing natural beauty, wildlife, and cultural heritage, and provides a consistent basis for integrating environmental considerations into planning decisions.

186) Do you have any evidence as to the impact of implementing the additional regard duties for development?

At this time, West Oxfordshire District Council does not hold direct evidence regarding the practical impact of implementing the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act on development outcomes. The duties are new, and it is likely that their effects on planning decision-making, development patterns, and environmental protection will only become clear once authorities begin applying them consistently. However, the Council anticipates that clearer statutory obligations should lead to more consistent consideration of protected landscapes in planning decisions.

187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council partly supports the approach to plan-making for the historic environment set out in Policies HE1–HE3. The policies provide a clear framework for identifying, conserving, and enhancing heritage assets and for integrating heritage considerations into development plans, including World Heritage Sites, conservation areas, and non-designated heritage assets. The emphasis on proportionate heritage assessment, positive strategies for conservation, and alignment with design codes and masterplans is welcomed.

However, there are some practical and strategic concerns. Policy HE1(d) encourages the creation of a local list of non-designated heritage assets important to the community. While this is valuable, many local planning authorities do not have the resources or capacity to compile a comprehensive local list, which may limit the effectiveness of this requirement.

Additionally, although HE1(c) references the contribution of heritage to character and quality through design codes and masterplans, there remains a broader concern within the heritage sector that other chapters of the Framework pay limited regard to heritage, local distinctiveness, and placemaking.

Stronger integration of heritage into wider planning policy would help ensure that conservation positively contributes to quality of life, well-being, and local character, in line with initiatives such as Historic England's Wellbeing and Heritage strategy.

188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy HE5? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council strongly supports Policy HE5. The policy provides a clear and comprehensive framework for assessing the effects of development on heritage assets, recognising the full range of potential impacts from positive enhancement to total loss of significance. The emphasis on proportionate assessment, consultation of the historic environment record, and the use of appropriate expertise is welcomed and reflects best practice in heritage-led planning.

The Council particularly supports the focus on the effect on an asset's significance rather than the scale of development, ensuring that decision-making prioritises heritage value.

The inclusion of specific requirements for assets with archaeological interest, including desk-based assessments and field evaluations where necessary, further strengthens the policy.

189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The Council welcomes the clarification on decision-making for designated heritage assets and the support for positive impacts, including re-use of underused buildings and energy efficiency improvements. The change from "great weight" to "substantial weight" is supported.

However, the reference made in paragraph three to weighing harm against "public benefits" raises concerns. Without safeguards, proposals such as solar panels, wind turbines, or intrusive insulation could be justified even where harmful.

Any such measures must be subject to robust assessment to ensure compatibility with traditionally built historic buildings and compliance with Historic England guidance, including the Whole Building Approach, to protect the character and fabric of heritage assets.

190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

The Council welcomes the clearer guidance for World Heritage Sites, conservation areas, and archaeological assets, which strengthens protection and enhancement of heritage in the planning system.

In particular, Policy HE8 provides a robust framework for safeguarding Blenheim Palace World Heritage Site, recognising its Outstanding Universal Value, setting, and cumulative impacts.

While the policy rightly supports proposals that preserve or enhance the setting, it should also be explicit that proposals causing harm to the significance or setting of the World Heritage Site must be refused.

191) Do you have any other comments on the revisions to the heritage chapter?

West Oxfordshire District Council welcomes the overall revisions to the heritage chapter, which provide clearer guidance on planning for heritage assets, World Heritage Sites, conservation areas, and archaeological assets. The strengthened focus on positive impacts, significance, and proportionate assessment is supported.

However, the Council notes several areas for improvement. There should be greater emphasis on integrating heritage considerations into wider placemaking and design policies, ensuring that heritage contributes to local character, distinctiveness, and quality of life. The language around local lists of non-designated heritage assets could reflect the practical resource constraints of local authorities. In addition, for World Heritage Sites, the text should explicitly require refusal of proposals that would harm significance or setting, not just support proposals that enhance it.

192) Do you agree with the transitional arrangements approach to decision-making?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council partly agrees with the proposed transitional arrangements but has in-principle concerns about using the new Framework for decision-making from the date of publication.

Applying the Framework immediately could render even relatively recent local plans effectively out of date very quickly, creating uncertainty for decision-makers, applicants, and communities. An appropriate transitional period should therefore be applied to allow existing plans to continue to guide decisions until such time they can be updated in light of the new Framework.

The transitional arrangements must make it explicitly clear that emerging draft local plans, including those currently under preparation, will be examined against the December 2024 version of the Framework. This would provide clarity for local authorities and stakeholders, ensure consistency in plan-making, and avoid undermining the credibility or robustness of plans submitted under the current system.

193) Do you have any further thoughts on the policies outlined in this consultation?

No.

194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council strongly objects to the proposed superseding of the December 2023 Written Ministerial Statement on local energy efficiency standards. This statement has been central in underpinning the Council's approach to Net Zero Carbon development, particularly at Salt Cross Garden Village, as reflected in the recently adopted Area Action Plan.

Rescinding this WMS without any transitional arrangements would effectively render the Area Action Plan out of date and undermine the Council's ability to deliver its net zero carbon ambitions.

The policy provides a locally tailored, evidence-based framework for sustainable development, and removing its statutory weight could delay or compromise key climate commitments. At a minimum, any changes to the WMS should include transitional provisions that preserve the continued relevance and application of the policy for recently adopted plans such as Salt Cross.

195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please give reasons.

West Oxfordshire District Council partly agrees that the proposed planning reforms, including the Planning and Infrastructure Act, provide greater flexibility for energy generation projects co-located with data centres. The ability for the Secretary of State to direct projects into or out of the NSIP regime, and for co-located energy generation to be considered alongside data centres, is a positive step that should help reduce delays and improve certainty for developers.

However, there are practical concerns. Even with the redirection power, separate consenting regimes can still create complexity and uncertainty, particularly for large-scale renewable energy projects that support data centres but may not clearly meet NSIP thresholds.

The Council considers that further clarity or transitional guidance is needed to ensure local authorities and developers understand which consenting regime applies and how dependencies between data centres and energy generation will be managed.

196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? Yes/No

Yes.

a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.

Raising the Planning Act 2008 thresholds for renewable energy generation projects co-located with data centres would be beneficial. Doing so would provide greater certainty for developers, reduce delays caused by navigating separate consenting regimes, and simplify the planning process for projects where the energy infrastructure is integral to the operation of the data centre. This would help to accelerate the delivery of critical AI and digital infrastructure while maintaining proportionate oversight.

The appropriate threshold should be set at a level that reflects the typical energy requirements of medium to large-scale data centres, ensuring that projects essential to operational viability can be consented without unnecessary recourse to NSIP processes.

197) Do you have any views on how we should define ‘co-located energy infrastructure’? Please provide your reasons.

Co-located infrastructure should include energy generation facilities that are physically located on, or immediately adjacent to, the data centre site and that are primarily designed to supply electricity directly to the data centre to ensure operational viability.

The definition should also allow for integrated energy storage or distribution systems that form an essential part of the data centre’s energy supply.

198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? Yes/No

No.

a) Please provide your reasons.

Any increase in the Planning Act 2008 renewable energy generation thresholds should be limited to projects co-located with data centres. The operational and energy dependencies of data centres are unique, and raising thresholds more broadly could unintentionally shift significant renewable energy projects away from local decision-making and scrutiny, reducing local accountability and potentially bypassing important environmental and community considerations.

199) What benefits or risks do you foresee from making this change? Please provide your reasons.

If thresholds were applied more broadly, it could reduce local oversight, limit community input, and bypass environmental safeguards. Even for co-located projects, careful guidance is needed to ensure energy generation is proportionate, appropriately sited, and does not cause unintended local impacts.

200) Would you support the use of growth testing for strategic, multi-phase schemes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please explain your answer.

West Oxfordshire District Council partly supports growth testing for strategic, multi-phase schemes. It provides upfront clarity on developer contributions, helps manage long-term risks, and supports plan policy compliance. However, growth assumptions may not be realised over long build-out periods, potentially reducing returns below investable thresholds. Any approach should include regular review points and flexibility to adjust contributions to ensure sites remain viable and deliverable throughout their development.

201) Would you support the optional use of growth testing for regeneration schemes?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

a) Please explain your answer.

West Oxfordshire District Council partly supports the optional use of growth testing for regeneration schemes. Growth testing could help provide early clarity on developer contributions and viability, enabling more effective planning and delivery of complex regeneration projects.

However, as with multi-phase schemes, care is needed to ensure that unrealistic growth assumptions do not undermine scheme viability. Any approach should include clear review mechanisms and safeguards to maintain deliverability.

202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Partly agree.

Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market-led development.

West Oxfordshire District Council partly agrees that providing greater specificity could improve certainty and speed in plan-making and viability assessments. Clearer benchmarks would reduce negotiation and help stakeholders understand expected contributions, particularly on strategic or phased sites.

However, flexibility must be retained to reflect site-specific circumstances, different development types, and varying levels of risk. Single figures should not be applied rigidly. A figure around 17.5% could serve as a default for market-led development, with local authorities able to justify adjustments based on evidence and any local or site-specific circumstances.

203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?

Yes.

a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.

West Oxfordshire District Council considers that alternative, lower developer return figures could reasonably apply to certain site types, tenures, and development models. In particular, a 6% return on Gross Development Value for affordable housing tenures would provide clarity, reflect the lower-risk nature of these developments, and make viability assessments more transparent.

Lower figures may also be appropriate for developments with alternative economic models, such as long-term rental schemes, or for sites de-risked by public sector investment, where the potential for profit is reduced.

204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?

Yes.

a) Please explain your answer.

Greater specificity and certainty over profit expectations could be achieved by providing clear default benchmarks for different development types and tenures, while allowing local authorities to adjust figures based on robust evidence. This could include standardised assumptions for market-led housing, affordable housing, and long-term rental or build-to-rent schemes.

Transparency could be further supported through guidance on how risk, site complexity, and public sector investment are accounted for in returns.

205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

The continued use of Gross Development Value (GDV) as a standard measure of developer return could be strengthened by providing clear, consistent definitions of what is included in GDV for the purposes of viability assessments. This should cover revenue from all relevant residential and commercial units, any affordable housing contributions, and associated non-residential uses where applicable.

Standardisation could also include guidance on timing assumptions, phasing, and treatment of exceptional or one-off revenues.

While alternative metrics such as Internal Rate of Return (IRR) or Return on Capital Employed may be useful in specific contexts, retaining GDV as a core benchmark, with clear, transparent rules, would provide consistency and reduce disputes between developers and local authorities.

206) Do you agree there are circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please explain your answer.

West Oxfordshire District Council partly agrees that alternative metrics, such as Internal Rate of Return (IRR) or Return on Capital Employed (ROCE), could in some circumstances support faster housing delivery or improve compliance with plan policies. These metrics can provide a more realistic assessment of cash flow and investment performance over longer-term, phased, or complex schemes, particularly for build-to-rent or multi-phase developments.

However, such metrics can be more volatile and complex and less transparent than profit on Gross Development Value. Their use should therefore be optional, applied only where they provide clear advantages, and supported by guidance to ensure consistency and comparability across schemes.

207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

Potentially.

a) Please explain your answer.

West Oxfordshire District Council considers that alternative metrics to profit on Gross Development Value could be appropriately applied to specific types of development where standard GDV metrics may not fully reflect financial realities.

Using metrics such as Internal Rate of Return or Return on Capital Employed in these cases could improve accuracy in assessing viability, support delivery, and ensure compliance with plan policies, while maintaining GDV as the default measure for most standard market-led developments.

208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) In what circumstances might a premium, or the usual premium, not be required?

West Oxfordshire District Council strongly agrees that guidance should acknowledge that a landowner premium may not be required in all circumstances. Situations where a premium might not be necessary include sites that represent a financial or maintenance liability, land held by public sector bodies or charitable organisations prioritising wider public benefits, or land where disposal supports strategic planning objectives.

b) What impact (if any) would you foresee if this change were made?

Recognising these circumstances could improve the viability of development and encourage the release of land for delivery. However, care must be taken to ensure the change does not disincentivise private landowners from bringing land forward, or artificially suppress land values.

209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please explain your answer.

West Oxfordshire District Council strongly agrees that extant planning consents should not automatically be taken as proof of alternative use value. While alternative use value can provide useful context, it must reflect realistic market conditions and the likelihood of the land actually being developed for that use.

Assuming consents alone can inflate land values and reduce policy-compliant developer contributions, even where demand for the alternative use has lapsed.

Guidance should make clear that alternative use value is only relevant where it represents a viable, deliverable prospect consistent with up-to-date plan policies.

210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? *Decision maker discretion / Another metric / Neither*

Decision maker discretion.

a) If another metric, please set out your preferred approach and rationale.

West Oxfordshire District Council considers that decision-maker discretion is the most appropriate approach. Viability assessments often involve site-specific circumstances, including market conditions, development risk, and local policy requirements, which a rigid metric such as time since consent was granted would not fully capture. Allowing discretion ensures that alternative use value is only considered where it genuinely reflects a realistic, deliverable development option, while preventing artificial inflation of land values and ensuring contributions remain consistent with plan policies.

211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?

The government should provide clearer guidance and safeguards to ensure non-policy compliant schemes are excluded from benchmark land value assessments. This could include requiring that any market evidence used is fully aligned with up-to-date plan policies, including

affordable housing and infrastructure contributions, and that any historic transactions are adjusted to reflect policy compliance costs.

212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please explain your answer.

West Oxfordshire District Council strongly agrees that residual land values should be cross-checked against comparable schemes. This provides a valuable check to ensure that viability assessments are realistic and not distorted by unusual assumptions or outlier data.

It would help decision-makers identify where a scheme's reported residual value may be inconsistent with market realities and would help to promote greater transparency and consistency in assessing contributions.

Care should be taken, however, to avoid penalising genuinely atypical but deliverable proposals.

213) Do you agree that a 2.5 hectare threshold is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council partly agrees that a 2.5-hectare threshold for medium development is appropriate, as it provides greater flexibility for sites in suburban and rural areas where average densities and necessary infrastructure mean slightly larger site areas are required to deliver 10–49 homes.

However, the Council has some concerns that even 2.5 hectares may still constrain certain sites, particularly in rural areas with larger plots or lower density development requirements. Flexibility should be retained to account for local site conditions, infrastructure needs, and green space provision, so that the threshold does not inadvertently exclude viable SME-led schemes.

214) Do you agree that a unit threshold of between 10 and 49 units is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly agree.

a) Please provide your reasons, particularly if you disagree.

West Oxfordshire District Council strongly agrees that a unit threshold of 10 - 49 homes is appropriate. This range is consistent with the emerging West Oxfordshire Local Plan 2043, reflects the scale of development typically delivered by SME developers, and supports a proportionate and targeted approach to planning for medium-sized sites.

215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development? Yes/No.

Yes.

216) If so, please explain your answer and provide views on potential mitigations.

While the proposed definition of medium development provides clarity and supports SME developers, there are potential risks that larger sites could be artificially subdivided to benefit from the easements, or that lower-density schemes could be delivered to fall within the 10–49 unit range.

Potential mitigations could include clear guidance in the Framework or supporting documents that prevents the artificial splitting of larger sites and ensures that any easements only apply where genuine SME-led medium-scale development is proposed. The use of model section 106 templates, including those tailored for medium sites would assist.

217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?

Yes, the small development exemption from the Building Safety Levy should be extended.

a) Please provide your reasons.

SME developers typically operate on tighter margins, and extending the exemption would help ensure that medium-scale sites remain viable, supporting delivery of housing in line with local plan targets, including the emerging West Oxfordshire Local Plan 2043.

Linking it to site area could introduce unnecessary complexity and administrative burdens.

218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?

Yes.

a) Please provide your reasons.

120 bedspaces for purpose-built student accommodation (PBSA) is an appropriate equivalent. Aligning with the ratio of 2.4 used in the Housing Delivery Test to convert PBSA bedspaces into net additional homes, will help to ensure consistency and provides clarity and certainty for developers and local planning authorities.

219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.

The exemption should continue to be based solely on dwellings and bedspaces, in line with the current approach. Introducing an area threshold could add unnecessary complexity and administrative burden for local authorities in calculating and monitoring the levy, without significantly improving fairness or targeting.

220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.

Extending the small developments levy exemption to cover sites of up to 50 dwellings and 120 student bedspaces is likely to have a positive impact on equality. By reducing costs for SME and medium-scale developers, it could help maintain or increase the delivery of smaller, more affordable homes, which often support households with protected characteristics, including younger people, low-income families, and disabled residents.

221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.

Extending the small development levy exemption to sites of up to 50 dwellings or 120 student bedspaces is likely to improve the economic viability of medium-sized schemes and support SME developers, who deliver a significant proportion of housing in West Oxfordshire. This change would help reduce upfront costs and encourage the timely delivery of new homes, including affordable housing, without materially affecting larger developers.

222) Do you agree with the proposal to extend the Permission in Principle application route to medium development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Strongly disagree.

a) Please provide your reasons, particularly if you disagree.

We do not agree with extending the Permission in Principle application route to medium development. While the current PIP process is useful for smaller sites, medium developments of 10 - 49 dwellings are generally too complex to be properly assessed through this streamlined route.

Such schemes often require detailed consideration of infrastructure, design, drainage, transport, and environmental impacts, which cannot be adequately addressed through the limited statutory information required for PIP.

Extending PIP to these sites risks undermining robust planning scrutiny, could result in unsuitable or poorly designed development, and would place additional pressures on local planning authorities to manage potentially contentious proposals without the full assessment that a standard planning application provides.

This would be a step too far and should not be pursued. Medium developments should continue to be considered via the full planning application process to ensure appropriate, sustainable outcomes.

223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?

Introducing a short planning statement for such larger schemes would not address the fundamental issue that medium developments are too complex to be considered under the PIP route. The PIP process is intended for minor sites where impacts are limited and easily assessed. Medium developments require a full planning application to properly consider matters such as design, infrastructure, transport, drainage, and environmental effects. Any attempt to compress these considerations into a short statement would risk inadequate scrutiny and could undermine the quality and sustainability of development.

224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

No.

225) Is there anything that could be done to mitigate any impact identified?

No.

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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>SUSTAINING INVESTMENT INTO COMMUNITY SERVICES</p>
<p>Wards affected</p>	<p>ALL</p>
<p>Accountable member</p>	<p>Executive Member for Stronger Healthier Communities Email: rachel.crouch@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Phil Martin - Director of Place Email: phil.martin@westoxon.gov.uk</p>
<p>Report author</p>	<p>Heather McCulloch – Community Wellbeing Manager Email: heather.mcculloch@westoxon.gov.uk Lucy Empson – Community Funding Officer Email: lucy.empson@westoxon.gov.uk</p>
<p>Summary/Purpose</p>	<p>To outline the principles, application process and timeline for the commissioning of three-year Service Level Agreements for Community Grants covering the period 2027-2030.</p>
<p>Annexes</p>	<p>Annex A – Sustainability Impact Assessment outcome</p>
<p>Recommendation(s)</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> 1. Approve the principles and timeline as set out in Sections 3 and 4. 2. Agree an increase to the Base Budget of £53k per annum as part of the 2027-2028 budget setting process, and for subsequent years, bringing the total budget available to £555k over three years. 3. Delegate authority for oversight of the commissioning process to the Director of Place, in consultation with the Executive Member for Stronger Healthier Communities.
<p>Corporate priorities</p>	<ul style="list-style-type: none"> • Putting Residents First • A Good Quality of Life for All • A Better Environment for People and Wildlife

	<ul style="list-style-type: none"> • Responding to the Climate and Ecological Emergency • Working Together for West Oxfordshire
Key Decision	YES
Exempt	NO
Consultees/ Consultation	WODC Climate Change Manager and Principal Ecologist Publica Procurement Team

1. EXECUTIVE SUMMARY

- 1.1** In November 2025 the Executive agreed to commission a further three-year Community Grants Programme thus helping to safeguard support following Local Government Reorganisation in 2028. The base budget of £396,000 was also agreed.
- 1.2** This report sets out the proposed principles and timescale for commissioning the programme, which is required to be in place by April 2027. The rationale for providing 3-year funding is in order to meet the ambitions of the Council in terms of creating legacy, promoting excellence and supporting innovation.
- 1.3** In order to achieve the target date of April 2027 it is necessary to begin to prepare for the commissioning process now.

2. BACKGROUND

- 2.1** The Council introduced a three-year Service Level Agreement Programme for Community Grants in 2024. There are currently eight programmes of work being delivered by seven organisations. Wild Oxfordshire submitted two applications - one was on behalf of the Evenlode Catchment Partnership - and was successful in securing funding for both.
- 2.2** The current agreements end in 2027 so are approaching the end of Year 2.
- 2.3** Funding for the 2024-2027 programme is made up as follows:

Base budget	£ 396,000
Underspend in Westhive (Round 1)	£ 90,000
COMF Funding for MH	£ 60,000
Councillor priority funding	£ 7,500
Total	£ 553,500

- 2.4** The process utilised the procurement framework; however, final decision-making involved Executive Members and Senior Management. The demand for funding was much greater than anticipated, and additional funds were secured towards the end of the process to enable a wider range of organisations to benefit from support.
- 2.5** Under a separate arrangement the Council has a three-year agreement with Citizens Advice Oxfordshire, which is due to expire in April 2027. This contract is overseen by Mandy Fathers in Publica. It is recommended that the commissioning of this service beyond March 2027 remains separate to the Community Grant commissioning process.

3. PRINCIPLES OF THE NEW THREE-YEAR COMMUNITY GRANTS COMMISSIONING PROCESS

- 3.1** Once again, we are proposing to utilise the procurement framework. We have had an initial discussion with the Procurement team. We discussed our draft timeline and learning from the previous process. A key requirement identified is the need to set a budget for the whole

programme at the outset and adhere strictly to it throughout, to protect the integrity of the procurement process.

- 3.2 The external funding secured for the 2024-2027 programme is not available for the 2027-2030 programme. The Council is asked to consider increasing the base budget to add value and capacity to the programme.
- 3.3 It is proposed that the scheme opens to applications in June 2026 and closes in September 2026. Applications will be invited for programmes of work that align with the Council's priorities. These priorities are set out in, or informed by, the following strategies and plans:
- West Oxfordshire District Council Plan 2023-2027
 - Health and Wellbeing Strategy for Oxfordshire 2024-2030
 - Oxfordshire Local Nature Recovery Strategy (LNRS)
 - West Oxfordshire Climate Change Strategy 2025–2030 (district-wide carbon reduction and climate resilience)
 - West Oxfordshire Nature Recovery Plan 2024–2030
- 3.4 It is proposed that applications should focus on the delivery of the following outcomes:
- Lot 1 Climate Resilience** – achieving a reduction in carbon emissions and creating sustainable communities that are resilient to climate impacts, primarily flooding, extreme heat, and drought.
- Lot 2 Nature Recovery** – enhancing the natural environment to increase biodiversity, alongside providing wider opportunities for people to access it and understand its value.
- Lot 3 Community Wellbeing** – reducing health inequalities and creating more connected communities to enable people to enjoy a better quality of life
- 3.5 From the Council's perspective as a funder, measurable outcomes provide greater confidence in a proposal, demonstrating that a strategic plan is in place. Our focus will be on measuring the degree to which the proposed investment is likely to deliver tangible benefits, and well-defined outcomes can provide that assurance.
- 3.6 A maximum award of £30,000 per year, per application, is proposed. We recognise that this will support a smaller number of organisations overall but does recognise the increased costs and ensures that the funding given by the Council remains significant and impactful to the organisations receiving it. Whilst applicants may bid for less than three years funding we fully expect all applications are expected to request funding for the full three-year period. There will not be an amount of funding allocated per Lot. It is expected that applications may deliver across multiple Lots. An organisation will be permitted to submit a maximum of 2 applications.
- 3.7 Specialist officers will form a Panel to review and score all applications, following verification by the Procurement team.
- 3.8 The Panel will give priority to projects that can demonstrate:

- Partnership approaches to the delivery of the activities
- Strong links to identified needs and supporting data
- Delivery across more than one outcome/lot.
- Environmental impact – maximising carbon reduction, climate resilience and nature recovery
- Social impact – clear benefits to residents
- Neighbourhood impact – localised gains
- Commitment to improving rural access to services
- Inclusivity – tackling inequality of opportunity
- Co-benefits for climate and nature
- Deliverability and impact within the proposed timeframe
- Innovation and excellence
- Beneficiaries remain exclusively West Oxfordshire residents following Local Government Reorganisation.

3.9 Weighting will be applied to certain elements of the response - with the Method Statement being the most important part. The Panel scores will determine which applications are successful.

3.10 The following is a list of the types of programmes which might come forward:

Improving rural transport options	Habitat restoration and creation (e.g. meadows, planting trees)	Activities to enhance mental wellbeing
Community energy generation	Active travel	Community art and cultural programmes
Food equity initiatives	Improved access to greenspaces	Programmes reducing isolation
Energy efficiency initiatives	Natural flood management or extreme heat management	Activities for young people outside of school
Facilitating partnership working for nature recovery	Species conservation	Community food growing

3.11 Organisations will be deemed eligible to apply on the following basis:

Eligible	Ineligible
Constituted voluntary and community groups	Commercial organisations
Registered and excepted charities	Exempt charities
Community Interest Companies (CICs)	Town and Parish Councils

Independent statutory bodies in appropriate circumstances	Statutory bodies
	Organisations delivering a statutory service on behalf of a statutory body
	Education providers
	Religious-based organisations proposing to undertake work that includes acts of worship or religious instruction

3.12 A report setting out the funding decisions will be presented to the Informal Executive in November 2026.

4. TIMETABLE

4.1 The proposed timetable for the commissioning process is as follows:

4 March	Report to Overview and Scrutiny setting out the approach
11 March	Report to Executive setting out the approach
June 2026	Scheme opens Market - place event held
September 2026	Scheme closes
September / October 2026	Verification by Procurement team
October / November 2026	Bids circulated to the Assessment panel Assessment Panel meet
November 2026	Report to Executive to note the outcome of the procurement Inform Finance team regarding budget
December 2026	Notify applicants of the decision
January – March 2027	Legal agreements drafted, exchanged and approved Mobilisation of new providers
April 2027	Programme commences

5. COMMISSIONING COMMUNITY SERVICES

5.1 The procurement for a focussed high quality, independent housing advice, welfare and debt advice service, is being led by another department and was previously procured in a

separate competitive exercise with an alternative timeframe. The Contract for these services was for 3 years, starting 1 April 2024 and ending on 31 March 2027.

- 5.2 The current arrangements are under review, and a formal procurement process will be administered later this year to ensure a new contract is in place for 1 April 2027.

6. ALTERNATIVE OPTIONS

- 6.1 The timeframe could be contracted as at the moment it is very generous. Options could include opening the programme to applications later in the year, reducing the application window, shortening the assessment and decision-making period, or providing applicants with less notice of funding outcomes. However, our preference is to retain a generous timeline at this stage to allow for unexpected developments and competing demands on time. The Procurement team have confirmed that the proposed timeframe is both achievable and preferable.
- 6.2 The number of Lots could also be adjusted, either reduced or increased. Our preference is to maintain multiple focus areas, as this is likely to make the programme more relatable and accessible to a wider range of potential applicants across different sectors.

7. FINANCIAL IMPLICATIONS

- 7.1 The base budget for the programme is £396k which would enable the Council to support a maximum of five projects over the three-year period.
- 7.2 The Executive is asked to consider whether growth to the base budget should be sought as part of the 2027/2028 budget setting process to add value and capacity to the programme.
- 7.3 In the previous programme demand outstretched supply considerably. It is anticipated that the 2027-2030 programme will attract a high number of strong applications, recognising that the funding environment is challenging for the voluntary and community sector. Operating costs including those relating to staff have increased significantly over the past three years.
- 7.4 In recognition of increasing costs the maximum annual award will be £30,000 per annum, per award. While this limit was previously extended for one organisation, this approach is not proposed for this programme, to allow resources to be distributed across the widest possible range of organisations.

8. LEGAL IMPLICATIONS

- 8.1 The process will be conducted through the procurement framework, ensuring that all due diligence is completed and appropriate organisations are awarded funding. The Communities team will work closely with the Procurement team to ensure the process is followed correctly.
- 8.2 Support from the Legal team will be required to draft legal agreements with each successful applicant once decisions have been reached. This is expected to take place between January and March 2027.

9. RISK ASSESSMENT

- 9.1** The primary risk is not meeting the proposed timescale with the effect that organisations will be left without confirmed funding. In such an event, service delivery may be disrupted, residents could be affected, and the Council's reputation could be negatively impacted.
- 9.2** The strict adherence to the procurement framework minimises the likelihood of challenge from unsuccessful organisations.

10. EQUALITIES IMPACT

10.1 This report and resulting commissioning process will consider equality and inclusivity in the decision-making process to ensure that the Council meets its duty to pay due regard to the need to eliminate discrimination and promote equality in relation to:

- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

10.2 Applications that demonstrate inclusivity and actively tackle inequalities will be prioritised.

11. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

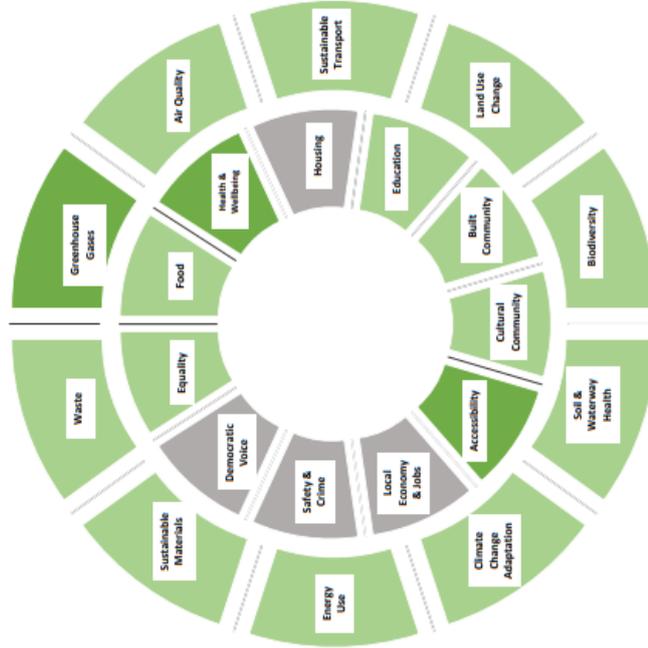
- 11.1** Please see the SIAT as Annex A.
- 11.2** The funding will encourage and support local communities to take action on climate and nature, enabling them to realise the associated environmental and social benefits.

12. BACKGROUND PAPERS

12.1 None.

(END)

Annex A – Sustainability Impact Assessment Outcome



Criteria	Score	Justification
Energy Use	2	The Council currently funds a project focused on delivering retrofit measures to support the use of renewable energy sources. It is anticipated that similar projects may come forward as part of this funding round, however, this cannot be guaranteed.
GHGs	4	Half of the current 3 year Service Agreement partners are leading projects including the climate and environmental emergencies. Whilst it is difficult to predict what will come forward in the future, the property portfolio has specific sources to 3 'bars', 2 of which are focused on nature recovery and climate change. I have selected 'slightly reduce' as this sets a reasonable expectation.
Air quality	2	Unclear what funding will be available in the future, but funding for this next cohort will be dedicated to projects which address climate change and nature recovery, both of which are likely to have a natural outcome of reducing air pollution in some way.
Land use change	2	Again difficult to predict but expect, based on previous experience, a proportion of projects delivering improvements to bridleways to have selected some slight impacts. Criteria will certainly encourage projects which make a positive impact on the environment.
Soil and waterway health	2	We currently fund a project focused on improving river health through partnership working. It is anticipated that similar projects may come forward as part of this funding round, however, this cannot be guaranteed.
Waste	2	As previously mentioned we cannot guarantee what projects will come forward but we supported projects which recycle and reuse in the past and would expect to support in the future given the existing criteria
Sustainable Transport	2	Again it is difficult to predict what future funds will be available and which projects will be successful, so have estimated 'slightly'. Criteria currently strongly advocate for support to projects tackling climate and environmental crises.
Biodiversity	2	Again it has been difficult to predict the impact but we have measures in place to encourage projects which make a positive impact.
Climate Change Adaptation	2	We currently fund a project focused on reducing carbon. It is anticipated that similar projects may come forward as part of this funding round, however, this cannot be guaranteed.
Sustainable Materials	2	As above it is difficult to predict but we would be encouraging the use of sustainable materials and would expect some projects coming forward where this is relevant. Not all projects will have an element of capital but may have some materials costs.
Food	2	We may have organisations come forward that directly address this issue, or do so in a way through schemes or side projects they are running such as HomeStart, and Chipping Norton Theatre 2 of our current SLA partners.
Health	4	Current SLA partner projects seek to improve health outcomes for residents either directly or indirectly and would anticipate seeing the same from future applicants.
Housing	0	I do not think that the scheme would provide any change in this area
Education	2	Current SLA partner projects seek to improve education for residents either directly or indirectly and would anticipate seeing the same from future applicants.
Built Community	2	We may see projects come through that address this but no guarantees can be made.
Cultural Community	2	Current SLA partner projects seek to improve education for residents either directly or indirectly and would anticipate seeing the same from future applicants.
Accessibility	4	Successful projects with address barriers mentioned above
Local Economy and Jobs	0	Unlikely to receive projects addressing this based on the lot specifications
Safety	0	Unlikely to receive projects addressing this based on the lot specifications
Democratic Voice	0	No obvious impact in this area
Equity	2	Positive impact on groups with protected characteristics.

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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL BIODIVERSITY DUTY REPORT</p>
<p>Wards affected</p>	<p>All</p>
<p>Accountable member</p>	<p>Cllr Andrew Prosser, Executive Member for Climate Action and Nature Recovery Email: Andrew.Prosser@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Chris Hargraves, Head of Planning Email: Chris.Hargraves@westoxon.gov.uk</p>
<p>Report authors</p>	<p>Melanie Dodd, Principal Ecologist Email: Melanie.Dodd@westoxon.gov.uk</p>
<p>Summary/Purpose</p>	<p>To consider the West Oxfordshire District Council Biodiversity Duty Report, which must be published by the Council before 26 March 2026.</p>
<p>Annexes</p>	<p>Annex A – West Oxfordshire District Council’s Biodiversity Duty Report 2026</p>
<p>Recommendation(s)</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> 1. Note the content of the West Oxfordshire Biodiversity Duty Report attached at Annex A; and 2. Agree that the report be published before 26 March 2026 in accordance with legislative requirements.
<p>Corporate priorities</p>	<ul style="list-style-type: none"> • Putting Residents First • A Good Quality of Life for All • A Better Environment for People and Wildlife • Responding to the Climate and Ecological Emergency • Working Together for West Oxfordshire
<p>Key Decision</p>	<p>No</p>

Exempt	No
Consultees/ Consultation	<p>Andrea McCaskie, Director of Governance and Regulatory Services</p> <p>Chris Hargraves, Head of Planning</p> <p>Andrew Thomson, Planning Policy Manager</p> <p>Hannah Kenyon, Climate Change Manager</p> <p>Cllr Andrew Prosser, Executive Member for Climate Action and Nature Recovery</p>

1. EXECUTIVE SUMMARY

- 1.1 This report provides an overview of the West Oxfordshire District Council Biodiversity Duty Report in order to agree that it can be published by the Council before 26 March 2026 in accordance with legislative requirements.
- 1.2 The Biodiversity Duty originates from Section 40 of the Natural Environment and Rural Communities Act 2006 (as amended)¹ and was strengthened by the Environment Act 2021², which introduced the requirement to publish a Biodiversity Duty Report.
- 1.3 Department for Environment, Food and Rural Affairs (DEFRA) guidance provides information on what the Biodiversity Duty Report must contain³. This guidance confirms that local authorities can set the start date, but that the end date for the first reporting period is 1 January 2026.
- 1.4 For West Oxfordshire the reporting period is from 12 February 2024 to 1 January 2026.
- 1.5 Most of the current and future actions identified to demonstrate compliance with the Biodiversity Duty are contained within the Council's Nature Recovery Plan 2024-2030⁴ ('the Plan'), alongside the statutorily required information on Biodiversity Net Gain (BNG).

2. BACKGROUND

The Biodiversity Duty

- 2.1 The Biodiversity Duty is a legal obligation for public authorities who operate in England to consider the conservation and enhancement of biodiversity across all their functions.
- 2.2 Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended) originally placed a specific duty on public authorities to conserve biodiversity in exercising their functions. This was strengthened and amended by the Environment Act 2021, so that public authorities are now required to conserve and enhance biodiversity through the exercise of their functions – referred to as the “biodiversity objective”.

The Biodiversity Objective

- 2.3 The NERC Act (as amended) states that “*the action which may be taken by the authority to further the general biodiversity objective includes, in particular, action taken for the purpose of:*

¹ <https://www.legislation.gov.uk/ukpga/2006/16/contents>

² <https://www.legislation.gov.uk/ukpga/2021/30/contents>

³ <https://www.gov.uk/guidance/reporting-your-biodiversity-duty-actions>

⁴ <https://www.westoxon.gov.uk/media/nvtbk0ob/nature-recovery-plan-2024-to-2030.pdf>

- *conserving, restoring or otherwise enhancing a population of a particular species, and*
- *conserving, restoring or otherwise enhancing a particular type of habitat.”*

2.4 The NERC Act enables public authorities to state that there is no further action to take, but if it is concluded that further action needs to be taken, S40 1(A) requires that the public authority must:

- determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and
- take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.

2.5 Section 40 (1B) enables point a) above to be satisfied by revising existing policies and specific objectives to further the general biodiversity objective. Section 40 (1E) requires that the determination of policies and objectives must be made as soon as practicable after consideration.

The Biodiversity Duty Report

2.6 The Environment Act 2021 has strengthened the NERC Act, and public authorities are now required to produce a Biodiversity Duty Report to evidence actions taken to conserve and enhance biodiversity.

2.7 Guidance⁵ from DEFRA states:

- *The end date of your first reporting period should be no later than 1 January 2026.*
- *After this, the end date of each reporting period must be within 5 years of the end date of the previous reporting period.*
- *You must include the start and end dates of your reporting period in each report.*
- *You must publish all reports within 12 weeks of the reporting period end date.*

By law, the biodiversity duty report must include:

- *a summary of the action you've taken to comply with the biodiversity duty.*
- *how you plan to comply with the biodiversity duty in the next reporting period.*
- *any other information you consider appropriate.*

Reports from local planning authorities must also include the following Biodiversity Net Gain (BNG) information:

- *the actions you've carried out to meet BNG obligations.*
- *details of BNG resulting, or expected to result, from biodiversity gain plans you've approved.*

⁵ <https://www.gov.uk/guidance/reporting-your-biodiversity-duty-actions>

- *how you plan to meet BNG obligations in the next reporting period.*

National Commitments

- 2.8** The actions taken by public authorities to meet the Biodiversity Duty will also contribute towards achieving national commitments for the natural environment.
- 2.9** The Environmental Improvement Plan (EIP) 2023⁶ sets out specific actions and targets to improve and restore natural environment and halt the decline in biodiversity. Under the Apex Goal of improving nature, commitments were set out to protect land and sea for nature through the Nature Recovery Network and delivering on this through the preparation and implementation of Local Nature Recovery Strategies (LNRS) and BNG.
- 2.10** The key commitments are:

By 2030, halt the decline in species abundance and protect 30% of land in the UK

By 2042, increase species abundance by at least 10% from 2023 levels, restore or create at least 500,000 hectares of wildlife-rich habitats, reduce the risk of species extinction and restore 75% of one million hectares of terrestrial and freshwater protected sites to favourable condition.

- 2.11** The EIP was updated in December 2025⁷ to build on this vision and goals, providing further detail for what actions are required. It sets out clear targets, including to restore nature, improve environmental quality, drive forward a circular economy, achieve environmental security, and increase access to nature.

3. THE WEST OXFORDSHIRE BIODIVERSITY DUTY REPORT

- 3.1** In line with the statutory requirements, a Biodiversity Duty Report must be published by the Council before 26 March 2026 (i.e. within 12 weeks of the end of the reporting period date of 1 January 2026).
- 3.2** The West Oxfordshire District Council Biodiversity Duty Report is attached at Annex A.
- 3.3** In terms of the reporting period, Officers have identified this as 12 February 2024 to 1 January 2026, which fits in with the introduction of statutory BNG and the publication of the Council's Nature Recovery Plan on 14 February 2024.

⁶ EIP 2023:

<https://assets.publishing.service.gov.uk/media/64a6d9c1c531eb000c64fffa/environmental-improvement-plan-2023.pdf>

⁷ EIP 2025:

https://assets.publishing.service.gov.uk/media/692d8d9cce50d215cae962a5/Environmental_Improvement_Plan_EIP_2025.pdf

3.4 The report adopts the following structure to demonstrate compliance with the Biodiversity Duty (as per the Defra guidance):

❖ **Policies, objectives and current actions**

- Policies and objectives set to meet the Biodiversity Duty
- Actions completed, either alone or in partnership, that benefit biodiversity

❖ **Future actions**

- How the local authority plans to fulfil the Biodiversity Duty over the next 5 years

❖ **Biodiversity Net Gain (BNG) Information**

- Actions carried out to meet BNG obligations
- Details of BNG resulting from, or expected to result from, approved Biodiversity Gain Plans
- How WODC will meet BNG obligations in the next 5 years

3.5 Relevant policies are included in the report, including the Council Plan, Local Plan and Climate Change Strategy.

3.6 The identified objectives relate to the Council's published Nature Recovery Plan 2024-2030, which was published in February 2024 as the first considerations and policy and objectives report to comply with the Biodiversity Duty.

3.7 Current actions taken within the reporting period are outlined and include actions that have been taken to implement the Council's Nature Recovery Plan since February 2024. These have been reported previously to Overview and Scrutiny Committee on 16 April 2025⁸ and 4 February 2026⁹.

3.8 In terms of the future actions identified for the next 5-year reporting period, these are mainly focussed on continuing to implement the Council's Nature Recovery Plan, projects that contribute towards the Oxfordshire Local Nature Recovery Strategy (LNRS)¹⁰ and ensuring policies to protect and enhance biodiversity are included in the new Local Plan 2043. Additional actions include a biodiversity audit of, and embedding consideration of biodiversity impacts within, all Council Service Areas, and setting up a nature recovery group for employees and councillors.

⁸ <https://meetings.westoxon.gov.uk/ieListDocuments.aspx?CId=1372&MId=2450>

⁹ <https://meetings.westoxon.gov.uk/ieListDocuments.aspx?MId=2602>

¹⁰ <https://www.oxfordshire.gov.uk/residents/environment-and-planning/local-nature-recovery-strategy-lnrs>

- 3.9** Some of the future actions relate to those projects identified as part of the Council’s current budget setting process for 2026-2027, including carrying out a green infrastructure study of at least the main settlements in the district to identify opportunities and align with the LNRS.
- 3.10** In terms of the actions taken by the Council in respect of its BNG obligations, the actions identified are based on work that has been carried out since statutory BNG was introduced for major developments on 12 February 2024 and minor developments (“small sites”) from 2 April 2024. These include setting up internal processes (e.g. updating validation checklist for planning applications), investing in software, providing training, supporting the establishment of habitat banks and publishing the BNG monitoring fee schedule.
- 3.11** The “*details of BNG resulting from, or expected to result from, approved Biodiversity Gain Plans*” have been generated using the software, ‘Mycelia’. This software is used by the Council’s ecologists to screen biodiversity metrics that are submitted within planning applications, but also to discharge the statutory Biodiversity Gain Plan planning condition. The software has a new reporting function that can be used to provide a summary of outcomes resulting from approved Biodiversity Gain Plans, including the number of plans that have been approved, onsite gains (e.g. average percentage uplift), offsite gains (e.g. purchase of habitat bank units) and the types of habitats that have been created and enhanced.
- 3.12** Additional information has been included on the support that the Council has provided for the establishment of habitat banks within the district which provide biodiversity units for developers who cannot achieve their required net gain on site.
- 3.13** In terms of meeting the Council’s BNG obligations for the next 5-year reporting period, the identified actions include:
- publication of a habitat bank establishment procedure to ensure due diligence and consistency for all future requests
 - continued support for training
 - incorporating policies on BNG and nature recovery in the new Local Plan 2043
 - incorporating actions relating to BNG into the Nature Recovery Plan 2024-2030
 - setting up BNG map layers to aid in the identification of sites and habitats for development management and future monitoring
 - preparation of a monitoring strategy.
- 3.14** For ease of reference, the identified actions are presented in a summary table format within the Biodiversity Duty Report.

3.15 Once the Biodiversity Duty Report is agreed it must be published on the Council's website before 26 March 2026, so that Defra has access to the information and members of the public can also see what is being achieved.

4. ALTERNATIVE OPTIONS

4.1 The Biodiversity Duty Report must be published in order to comply with the statutory requirement under the Environment Act 2021. As such there is no alternative option.

5. FINANCIAL IMPLICATIONS

5.1 This report raises no direct financial implications for the Council.

6. LEGAL IMPLICATIONS

6.1 The Biodiversity Duty Report must be published in order to comply with the statutory requirement under the Environment Act 2021.

7. RISK ASSESSMENT

7.1 This report presents no significant risks.

8. EQUALITIES IMPACT

8.1 This report raises no issues in terms of the Equalities Act 2010 or the Public Sector Equality Duty.

8.2 The decision to be made by Executive is purely about whether the Council should publish the Biodiversity Duty Report that will provide details of how the Council is meeting its statutory duty to conserve and enhance biodiversity. It will not have a significant impact on any employee or members of the community.

9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

9.1 The Biodiversity Duty Report is intrinsically linked to the implementation of the Council's Nature Recovery Plan 2024-2030 and Climate Change Strategy, as the actions resulting from the duty to conserve and enhance biodiversity will assist in tackling the climate and ecological emergencies.

9.2 Use of the Sustainability Impact Assessment Tool is not appropriate for the Biodiversity Duty Report, which is providing information on how the Council is implementing its statutory duty. The climate and ecological impacts of actions that the Council may take to deliver its biodiversity duty will be assessed using the Sustainability Impact Assessment Tool as they come forward where appropriate.

(END)

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Biodiversity Duty Report 2026

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Foreword

To be inserted for publication



Gatekeeper butterfly © M. Dodd

1 Introduction and Background

1.1 Introduction to West Oxfordshire

West Oxfordshire District Council (WODC) is a district authority in Oxfordshire which covers an area of 71,494 hectares. The district is characterised by a rich natural environment with approximately 34% of its area lying within the Cotswolds National Landscape.

The landscape and biodiversity of West Oxfordshire are interlinked. Just as the district boasts a rich and diverse landscape, it also supports a wide variety of habitats that sustain legally protected species, priority species and other wildlife. This diversity reflects the underlying soils and geological diversity of the area.

West Oxfordshire is the most wooded district in Oxfordshire encompassing the Wychwood Forest, Blenheim Estate and several other estates containing areas of ancient woodland, which in turn are important for associated species such as birds and bats.

According to the recently published Oxfordshire Local Nature Recovery Strategy (LNRS¹), ‘Areas of Particular Importance for Biodiversity’ make up 5.6% of West Oxfordshire and the broader nature recovery network, which includes opportunity areas that could become of particular importance for biodiversity, accounts for around 40% of the district as shown in Figure 1. This network of connected habitats will be vitally important for many species, including dormice, improving their ability to disperse, colonise new habitats and become more resilient to climate change.



West Oxfordshire Landscape © M. Dodd

1.2 What is the Biodiversity Duty?

Biodiversity refers to the variety of all life forms, including plants, animals, fungi and micro-organisms. A landscape that is rich in biodiversity provides the essential necessities for the survival of humans, including fresh water, clean air, climate regulation, food and medicines. It also contributes towards our physical and mental wellbeing. The benefits of conserving and enhancing biodiversity are therefore well known. For example, the planting of more trees and the restoration of grassland areas can not only lead to the sequestration of more carbon but can also mitigate against

¹ <https://www.oxfordshire.gov.uk/residents/environment-and-planning/local-nature-recovery-strategy-lnrs>

flooding events². Every wetland restored, every hedge planted, every soil improved, and every river reconnected delivers simultaneous climate and biodiversity benefits.

The biodiversity duty is a legal obligation for all public authorities in England to consider the conservation and enhancement of biodiversity across all their functions. Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended)³ originally placed a specific duty on public authorities to conserve biodiversity when exercising their functions, which was strengthened by the addition of the word “*enhance*” in the Environment Act 2021⁴. The conservation and enhancement of biodiversity is often referred to as the “biodiversity objective”.

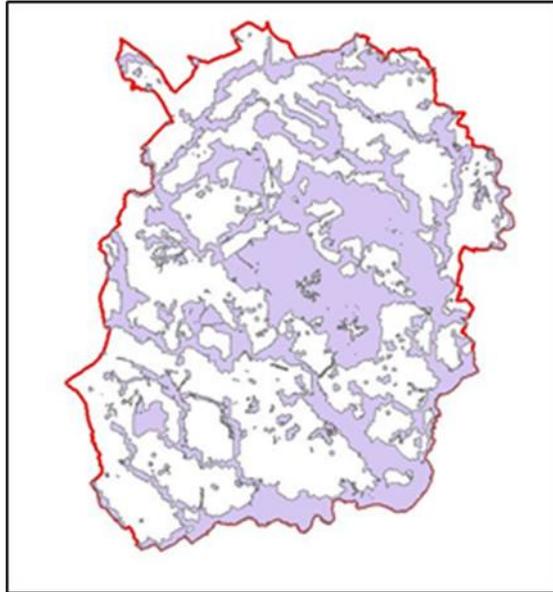


Figure 1 – the priority nature recovery network in West Oxfordshire

² <https://www.westoxon.gov.uk/environment/climate-action/enhancing-our-natural-capital/>

³ NERC Act: <https://www.legislation.gov.uk/ukpga/2006/16/contents>

⁴ Environment Act: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

1.3 The Biodiversity Objective

The NERC Act (as amended) states that *“the action which may be taken by the authority to further the general biodiversity objective includes, in particular, action taken for the purpose of:*

- a) Conserving, restoring or otherwise enhancing a population of a particular species, and*
- b) Conserving, restoring or otherwise enhancing a particular type of habitat.”*

While the NERC Act allows public authorities to conclude that no further action is needed, if it determines that action is required, S40 1(A) requires the public authority to:

- a) Determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and*
- b) Take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.*

Section 40 (1B) clarifies that revising existing policies and objectives can satisfy point a) above. Meanwhile, Section 40 (1E) requires that the determination of policies and objectives must be made as soon as practicable after consideration.

1.4 The Biodiversity Duty Report

Under the new Section 40 (A) of the NERC Act, public authorities are required to produce a Biodiversity Duty Report (BDR) to evidence actions taken to conserve and enhance biodiversity.

Guidance from the Department for Environment, Food and Rural Affairs (DEFRA)⁵ states:

- *The end date of your first reporting period should be no later than 1 January 2026.*
- *After this, the end date of each reporting period must be within 5 years of the end date of the previous reporting period.*
- *You must include the start and end dates of your reporting period in each report.*
- *You must publish all reports within 12 weeks of the reporting period end date.*

By law, the biodiversity duty report must include:

- *a summary of the action you’ve taken to comply with the biodiversity duty.*

⁵ Defra guidance: <https://www.gov.uk/guidance/reporting-your-biodiversity-duty-actions>

- *how you plan to comply with the biodiversity duty in the next reporting period.*
- *any other information you consider appropriate.*

Reports from local planning authorities must also include the following Biodiversity Net Gain (BNG) information:

- *the actions you've carried out to meet BNG obligations.*
- *details of BNG resulting, or expected to result, from biodiversity gain plans you've approved.*
- *how you plan to meet BNG obligations in the next reporting period.*

1.5 Reporting compliance with the biodiversity duty in West Oxfordshire

This report demonstrates how WODC complies with the biodiversity duty. The report is structured as follows:

- Policies, objectives and current actions
 - Policies and objectives established to meet the biodiversity duty
 - Actions completed (or ongoing), either individually or in partnership, that benefit biodiversity
- Future Actions
 - How WODC plans to fulfil the biodiversity duty over the next five years
- Biodiversity Net Gain Information
 - Actions carried out to meet BNG obligations
 - Details of BNG resulting, or expected to result, from approved Biodiversity Gain Plans
 - How WODC plans to fulfil BNG obligations over the next five years

1.6 Contribution towards national commitments

The actions taken by WODC to comply with the biodiversity duty will also contribute towards achieving national goals and targets.

In January 2023, the Government published the Environmental Improvement Plan (EIP23)⁶ which sets out specific actions and targets to improve and restore natural environment and halt the decline in biodiversity. Under the Apex Goal of improving nature, the plan outlines commitments to protect land and sea for nature through the Nature Recovery Network delivered via Local Nature Recovery Strategies (LNRS) and Biodiversity Net Gain (BNG) initiatives.

Key commitments include:

By 2030:

- Halting the decline in species abundance
- Protecting 30% of land in the UK

By 2042:

- Increasing species abundance by at least 10% from 2023 levels
- Restoring or creating at least 500,000 hectares of wildlife-rich habitats
- Reducing the risk of species extinction
- Restoring 75% of one million hectares of terrestrial and freshwater protected sites to favourable condition

The EIP was updated in December 2025⁷ to build on its vision and goals, providing further detail on required actions. The updated plan sets ten overarching goals, including:

- Restoring nature
- Improving environmental quality
- Driving forward a circular economy
- Achieving environmental security
- Increasing access to nature

⁶ EIP 2023: <https://assets.publishing.service.gov.uk/media/64a6d9c1c531eb000c64ffa/environmental-improvement-plan-2023.pdf>

⁷ EIP 2025: https://assets.publishing.service.gov.uk/media/692d8d9cce50d215cae962a5/Environmental_Improvement_Plan_EIP_2025.pdf

1.7 The Reporting Period

This report covers the period 12 February 2024 to 1 January 2026. The start date fits in with the introduction of statutory Biodiversity Net Gain and the publication of the Council’s Nature Recovery Plan on 14 February 2024, and the end date aligns with Defra guidance.

2 Policies, Objectives and Current Actions

2.1 Existing relevant policies, strategies and plans

A key function of the Council in terms of the biodiversity duty is its role as a Local Planning Authority. The Council has legal obligations relating to important wildlife sites, habitats and species; and requirements under the National Planning Policy Framework (NPPF) to conserve and enhance the natural environment. Conserving and enhancing biodiversity is achieved through the relevant policies of the West Oxfordshire Local Plan 2031 as set out below.

West Oxfordshire Local Plan 2031⁸

The following policies are most relevant with specific extracts taken from the adopted plan to summarise their connection with biodiversity. This overview does not include site-specific or place-based policies.

Core Objective CO14: *“Conserve and enhance the character and significance of West Oxfordshire’s high quality natural, historic and cultural environment, including its geodiversity, landscape, biodiversity, heritage and arts.”*

Policy OS4 High quality design: *“New development should... conserve or enhance areas, buildings and features or historic, architectural and environmental significance, including... habitats of biodiversity value... Enhance local green infrastructure and its biodiversity...”*

Policy E4 Sustainable tourism: *“Proposals in the Cotswolds AONB should conserve and enhance the landscape quality and biodiversity of the area... In the Lower Windrush Valley, the Council will continue to work with the Lower Windrush Valley Project and the County Council... proposals which complement... nature conservation benefits will be supported.”*

⁸ <https://westoxon.gov.uk/media/fejmpen/local-plan.pdf>

Policy EH2 Landscape character: *“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. 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.”*

Policy EH3 Biodiversity and geodiversity: *“The biodiversity of West Oxfordshire shall be protected and enhanced to achieve an overall net gain in biodiversity and minimise impacts on geodiversity, including by:*

- *Protecting designated sites*
- *Requiring Habitats Regulations Assessments for any development proposal likely to have a significant adverse effect, either alone or in combination, on the Oxford Meadows Special Area of Conservation (SAC)*
- *Protecting and mitigation for impacts on priority habitats, protected species and priority species, 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)*
- *Ensuring development works towards achieving the aims and objectives of the Conservation Target Areas and Nature Improvement Areas*
- *Promoting the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations*
- *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*
- *Ensuring that all applications that might adversely affect biodiversity are accompanied by adequate ecological survey information in accordance with BS42020:2013*
- *Demonstrating a net gain in biodiversity where possible.*
- *All developments will be expected to provide towards the provision of necessary enhancements in areas of biodiversity importance.”*

Policy EH4 Public realm and green infrastructure: *“The existing areas of public space and green infrastructure of West Oxfordshire will be protected and enhanced for their multi-functional role, including their biodiversity... value and for the contribution they make towards combating climate change. New development should:*

- *Avoid the loss, fragmentation and loss of functionality of the existing green infrastructure network*
- *Maximise opportunities for urban greening such as through appropriate landscaping schemes and the planting of street trees*
- *Provide opportunities for improvements to the District’s multi-functional network of green infrastructure (including Conservation Target Areas) and open space*

- *Demonstrate how lighting will not adversely impact on green infrastructure that functions as nocturnal wildlife movement and foraging corridors.”*

Policy EH6 Decentralised and renewable or low carbon energy development (excepting wind turbines): *“Renewable or low-carbon energy development should be located and designed to minimise any adverse impacts... In assessing proposals, the following local issues will need to be considered and satisfactorily addressed:*

- *Impacts on landscape, biodiversity...*
- *Opportunities for environmental enhancement... will be sought, especially where they will contribute to Conservation Target Areas and Nature Improvement Areas...”*

Policy EH7 Flood risk: *“In assessing proposals for development...*

- *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.”*

West Oxfordshire District Council Plan⁹ 2023 – 2027

The Council Plan includes three corporate priorities that support the conservation and enhancement of biodiversity; these are:

1. Enabling a good quality of life for all – for example, through the development and maintenance of green infrastructure that supports health and wellbeing, fosters community cohesion and delivers a high quality of life through access to nature and outdoor spaces.
2. Creating a better environment for people and wildlife – for example, by ensuring that land, air and water support biodiverse habitats, reduce pollution and promote nature recovery and supporting public engagement by improving understanding of, and access to, green spaces and the countryside.
3. Responding to the climate and ecological emergency – for example, by encouraging the use of nature-based solutions to sequester carbon and address climate-related risks at a river catchment scale such as restoring meadows and planting trees to reduce flooding and improve water quality.

⁹ <https://www.westoxon.gov.uk/media/z2ijlocw/west-oxfordshire-council-plan-2023-to-2027.pdf>

West Oxfordshire Design Guide¹⁰

The Design Guide was adopted in April 2016 as a Supplementary Planning Document. Chapter 13 covers biodiversity and protected species and sets out how local plan policies EH2 and EH3 should be considered and applied, including what information should be provided with a planning application.

Salt Cross Garden Village Area Action Plan (AAP)¹¹

This new policy document contains policies on biodiversity, including a requirement for at least a 25% net gain in biodiversity. Public Examination of the document has been completed. This document is scheduled for formal adoption by the Council in February 2026.

Local Plan Review (current and ongoing)¹²

Currently under review with a target of submission towards the end of 2026. The Preferred Policy Options Paper was consulted publicly during the summer of 2025¹³ and included a core policy on the natural environment (CP12), place-based policies included for Cotswolds National Landscape (PL1), Windrush Valley (PL3) and Wychwood Forest (PL4), as well as development management policies for green infrastructure (DM2), Biodiversity Net Gain and nature recovery (DM8) and trees and hedgerows (DM11). A separate consultation took place in autumn 2025 on the Preferred Spatial Options Paper¹⁴, including specific references to ecological enhancements within development sites that contribute towards the Oxfordshire LNRS. Preparation of the Regulation 19 version of the plan for public consultation in summer 2026 is ongoing.

Climate Change Strategy 2025-2030¹⁵

West Oxfordshire declared a Climate Change and Ecological Emergency in 2019 and approved the strategy in 2025. The strategy's vision states, "*Nature recovery solutions play a crucial role in mitigating climate change and enhancing resilience from its impacts.*" A key theme within this strategy is the protection and restoration of natural ecosystems, including sharing knowledge by engaging with specialists and local environmental

¹⁰ <https://www.westoxon.gov.uk/planning-and-building/planning-policy/supplementary-planning-documents/>

¹¹ <https://www.westoxon.gov.uk/planning-and-building/planning-policy/salt-cross-garden-village/salt-cross-area-action-plan-examination/salt-cross-area-action-plan-examination-2024-2025/>

¹² <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2043/>

¹³ <https://www.westoxon.gov.uk/media/qf3bnn0n/wodc-local-plan-preferred-policy-options-consultation-paper-june-2025.pdf>

¹⁴ <https://www.westoxon.gov.uk/media/ae0jcxni/local-plan-preferred-spatial-options-consultation-october-2025.pdf>

¹⁵ <https://www.westoxon.gov.uk/media/unnbqcd0/climate-change-strategy-2025-2030.pdf>

groups on how to increase biodiversity, accelerate nature recovery and build natural capital. Environment co-benefits to climate and nature actions include improving air quality, protecting biodiversity and conserving water.

Nature Recovery Plan 2024 – 2030¹⁶

This plan was released on 14 February 2024 as the Council’s first considerations and policy and objectives report in line with the biodiversity duty (as set out in section 1.3 above). It takes forward some of the Council’s Climate Change Strategy's objectives and outlines the specific objectives and actions the council will take to support nature recovery across the district to 2030. Biodiversity conservation and enhancement are part of nature recovery – the new term coincides with government policy and the introduction of the LNRS approach (see next item below). The Nature Recovery Plan incorporates three main aims: 1) facilitating communities and partnerships for landscape-scale nature recovery; 2) protecting and improving existing biodiversity on sites owned and managed by the Council; and 3) safeguarding biodiversity through policies and new development.

Oxfordshire LNRS¹⁷

The LNRS is a spatial strategy for nature recovery, the main purpose of which is to identify locations where the creation and/or enhancement of certain habitats would provide the greatest benefit for nature and the wider environment, including reconnecting habitats as part of an ecological network. It encourages the delivery of targeted actions for nature recovery as opportunities for funding and investment arise. It comprises four key ‘documents’: 1) Description of the Strategy Area, 2) Statement of Biodiversity Priorities, 3) Species Priority List and 4) Local Habitat Map (an online interactive map tool). While many species and habitats are identified as priorities at the national level, the LNRS enables these priorities to be specifically identified and linked to local landscapes, ensuring that actions are relevant to the specific ecological needs of Oxfordshire.

The Oxfordshire LNRS was published by Oxfordshire County Council (the “Responsible Authority”) in November 2025. As a supporting authority the Council has been involved in all stages of its preparation and contributed to its development through representation on the steering group committee, at technical workshops, draft reviews, consultation and advocating for local priorities. The publication of the Oxfordshire LNRS was endorsed by the Council at an Executive meeting on 10th September 2025^{18 19}. The LNRS is a key consideration in the Council’s approach to the biodiversity duty and will be used to inform priorities for action in the Nature Recovery Plan and the Local Plan review. The Council is represented on

¹⁶ <https://www.westoxon.gov.uk/media/nvtbk0ob/nature-recovery-plan-2024-to-2030.pdf>

¹⁷ <https://www.oxfordshire.gov.uk/residents/environment-and-planning/local-nature-recovery-strategy-lnrs>

¹⁸ <https://meetings.westoxon.gov.uk/ieListDocuments.aspx?MIId=2568>

¹⁹ <https://www.thisisoxfordshire.co.uk/news/25461043.oxfordshire-nature-recovery-plan-backed-district-council/>

the new LNRS Delivery Advisory Group through which it shares expertise, strategic guidance, review strategic projects and helps guide the delivery of nature recovery objectives in line with national requirements and local priorities.

2.2 Objectives

The Council's Nature Recovery Plan sets out the policies and objectives that will be implemented to meet the statutory biodiversity duty. Progress reports on the implementation of the Nature Recovery Plan were presented to the Council's Overview and Scrutiny Committee on 16 April 2025 and 4 February 2026. These progress reports provide the foundation for this Biodiversity Duty Report, particularly with regard to key projects and actions undertaken.

2.3 Current Actions

WODC declared an ecological and climate emergency in 2019²⁰ and is therefore committed to conserving and enhancing biodiversity through a range of approaches. These include strategic partnerships, planning policy, development management, land management and stakeholder engagement.

West Oxfordshire is rich in biodiversity, and its diverse habitats include ancient woodland, hedgerows, species-rich grasslands, ponds, lowland fens, rivers and streams.

The Council currently employs five in-house ecologists who provide specialist advice and support across the planning process, nature recovery, and other council service areas, including climate action, green space management and community engagement. Of these, three full time equivalent (FTE) ecologists focus on ecological input into the planning process, including development management and policy, and two FTE ecologists focus on nature recovery, including the implementation of the Council's Nature Recovery Plan and the Oxfordshire LNRS.

The Council works in partnership many organisations at local, county and national levels to support biodiversity conservation and nature recovery, including the following:

- Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)
- Community Action Groups Oxfordshire
- Cotswold National Landscape Board

²⁰ <https://www.westoxon.gov.uk/environment/climate-action/climate-action-and-what-we-are-doing/>

- Environment Agency
- Evenlode Catchment Partnership
- Forestry England
- Long Mead Foundation
- Lower Windrush Valley Project
- Natural England
- NatureSpace Partnership
- Newt Conservation Partnership
- Oxfordshire Local Nature Partnership
- Oxfordshire town, parish, district and county authorities (and of other neighbouring counties, particularly Gloucestershire)
- Public Health
- Thames Valley Environmental Records Centre (TVERC)
- Trust for Oxfordshire’s Environment (TOE)
- Wild Oxfordshire
- Windrush Catchment Partnership
- Wychwood Forest Trust

The Council also supports other organisations and groups in a variety of ways to further biodiversity conservation and enhancement, including the Northeast Cotswolds Farmer Cluster and local community groups.

A summary of actions currently undertaken by the Council is set out in Table 1 below.

Where “*Ecology*” is identified as the responsible team, this refers to the ecology sub-team within the Planning Policy department.

Where “*Planning*” is identified as the responsible team, this includes development management, planning policy, planning enforcement and planning administrative support (including validation).

Table 1: Current actions being carried out by West Oxfordshire District Council

Theme	Key Activities	Departments	Timeline
A. Strategic approach to biodiversity	Publication and implementation of a new Climate Change Strategy with biodiversity commitments.	Climate	2025 – ongoing
	Contribution to Oxfordshire Climate Adaptation Route Map with natural environment actions.	Climate, Ecology	2025– ongoing

Theme	Key Activities	Departments	Timeline
	Integral role in the preparation, launch and delivery of the Oxfordshire LNRS.	Ecology, Climate	2025 – ongoing
	Regulation 18 Local Plan Review Preferred Policy Options Paper including proposed policies on BNG and nature recovery – public consultation undertaken.	Planning Policy	2025
	Participation in an Innovate UK nature-based carbon sequestration project with the other Oxfordshire local authorities. Final report: Enabling Nature-Based Carbon Sequestration includes: 1) A review of nature-based carbon methodologies and routes to market, 2) Developing a High Integrity Nature-based Carbon Market Framework for Oxfordshire and 3) Implementation of nature-based markets in Oxfordshire.	Climate, Ecology	2025
	Community Action Plan for Zero-Carbon Energy project biodiversity targets set and monitored.	Climate, Ecology	2024 – ongoing
	Three-year Service Level Agreements with Wild Oxfordshire, Wychwood Forest Trust and Evenlode Catchment Partnership to support action for nature recovery.	Communities, Ecology	2024 – 2027
	Ongoing membership of the Oxfordshire Local Nature Partnership and its various subgroups, including BNG.	Ecology	2021 – ongoing
B. Integration into decision-making	Ensuring the submission of adequate and robust ecological information in planning applications in line with the local validation checklist.	Ecology, Planning	Ongoing
	Reviewing ecological information submitted in planning applications to ensure biodiversity impacts are properly considered.	Ecology, Development Management	Ongoing
	Applying the mitigation hierarchy and securing appropriate mitigation and/or compensation in line with relevant legislation, and national and local planning policies.	Ecology, Development Management	Ongoing
	Obtaining and managing relevant environmental data on habitats and species, designated sites, Biodiversity Net Gain and other features through a Service Level Agreement with the Thames Valley Environmental Records Centre (TVERC) – this is reviewed and updated annually. Data is used to identify constraints, inform the assessment of planning applications and for specific projects. TVERC 2024-25 annual	Planning	Ongoing

Theme	Key Activities	Departments	Timeline
	report confirms that 270,102 new records were added to their database, of which 16,268 were in West Oxfordshire, and 113 data search enquiries were processed.		
	Part-funding the Oxfordshire Local Wildlife Sites Project and sitting on the project steering group to oversee the selection of sites, the re-survey of existing sites and the provision of management advice to landowners. The project is delivered in partnership with the other Oxfordshire local authorities, TVERC and BBOWT. In West Oxfordshire there are 102 Local Wildlife Sites totalling 1,761.8 hectares and 48% are in positive management (including local geological sites).	Planning	Ongoing
	Carrying out Habitats Regulations Assessments as part of the planning process where required.	Planning	Ongoing
	Assessment of pollution, contamination, flood risk and water quality and management, including sewage infrastructure, in planning decisions.	Planning, Environmental Health, Lead Local Flood Authority	Ongoing
	Applying a Grampian condition to planning permissions where relevant to secure either the required sewage infrastructure improvements (e.g. foul water network upgrades) before developments can be occupied or a development and infrastructure phasing plan in consultation with the water company to allow development to be occupied, which will indirectly benefit biodiversity through cleaner rivers.	Planning	2025 – ongoing
	Securing biodiversity mitigation, compensation and/or enhancement through planning conditions.	Planning	Ongoing
	Hold a great crested newt district licence as part of the NatureSpace District Licensing Scheme to provide an alternative licensing option for developers. Aquatic and terrestrial habitat compensation is delivered via The Newt Conservation Partnership as part of a strategic species conservation strategy; 22 ponds and 60.6ha terrestrial habitat have been created in West Oxfordshire as part of this scheme.	Planning	2019 – ongoing
	Participation in a 12-month pilot scheme for priority species (skylark, linnet, yellowhammer and hedgehog) compensation to secure better outcomes from	Planning	2025 - 2027

Theme	Key Activities	Departments	Timeline
	developments through NatureSpace Partnership since December 2025. Given the nascent nature of the pilot, no developments have yet entered into the scheme.		
	Using LNRS mapping to inform the assessment of strategic development sites.	Planning Policy	2025
	Application of the Sustainability Impact Assessment Tool (SIAT) to Council projects to assess impacts on climate and nature.	All	Ongoing
	Using the Cotswolds National Landscape Management Plan 2025-2030 ²¹ as a material consideration in the planning process.	Planning	Ongoing
	Sustainable Tourism Grants Scheme to support visitor economy businesses to improve sustainability with nature recovery included as an assessment criterion.	Tourism Services, Ecology	2025
	Mini-business case review on street cleansing and grounds maintenance in April 2025, including consideration of biodiversity and nature recovery.	Waste and Environmental Services, Ecology, Climate	2025
C. Actions to improve biodiversity	Supporting the Lower Windrush Valley Project and Windrush Catchment Partnership.	Ecology	2025–ongoing
	Managing council-owned green spaces informed by updated land management plans, ecological surveys and BNG baselines.	Assets, Ecology, Climate	2025–ongoing
	Mapping, protecting and managing sensitive road verges for biodiversity. Carrying out a review of Road Verge Nature Reserves in conjunction with Oxfordshire County Council to explore the potential for more of these to be managed by the Council.	Assets, Ecology	Ongoing
	Installation of biodiversity features at the council offices in Woodgreen, Witney (bird, bat and bee boxes, wildflower meadows, bulbs, lavender and hedgerows). Provision of wildflower meadow management information to staff and visitors.	Assets, Ecology	2024–2025

²¹ <https://www.cotswolds-nl.org.uk/our-work/cotswolds-national-landscape-management-plan/>

Theme	Key Activities	Departments	Timeline
	Reduction in herbicide use and cessation of peat products.	Assets, Ecology	2025–2026
	Running the Coronation Community Orchard Scheme locally to provide funding to community groups for the planting of fruit trees, including schools. 206 trees planted to date and scheme finishes on 31 March 2026. Funded by the Coronation Living Heritage Fund (CLHF).	Ecology, Climate	2023–2026
	Delivery of the Windrush Valley landscape recovery project in partnership with the Wychwood Forest Trust.	Ecology	Ongoing
D. Engagement, education and partnerships	Delivery of a Local Environment Groups Conference through Wild Oxfordshire.	Communities, Ecology	2024–2025
	“Tackling inequalities through nature recovery” programme supporting communities facing socio-economic barriers in Chipping Norton, Carterton and Witney.	Communities, Ecology	2025–ongoing
	Leadership of the conservation volunteer group at Kilkenny Lane Country Park and providing support to other “Friends” groups.	Ecology, Assets	2024–ongoing
	Attendance at community nature events: 6 events in 2024 and 9 events in 2025, including ‘A River Sings’ film screening in Chipping Norton Town Hall on 22 April 2025 and Witney Town Council’s first Eco Fair on 9 October 2025.	Ecology	Ongoing
	Biodiversity guidance for parishes and district-wide survey of parish climate and nature activities.	Ecology, Climate	2025
	Delivery of the Waterways Fair to promote water management and nature recovery.	Executive Member for Environment, Ecology	2025
	Communications strategy for the orchard scheme and wider nature recovery projects.	Communications, Ecology	Ongoing

Theme	Key Activities	Departments	Timeline
	Continued operation of 'Westhive', the Council's Spacehive ²² fundraising programme supporting community projects such as the therapeutic Bridewell Gardens and community floodplain restoration projects in Swinford and Eynsham.	All	Ongoing

3 Future Actions

The Council will meet the biodiversity duty over the next five-year reporting period primarily through the continued implementation of its Nature Recovery Plan, which covers the period 2024 to 2030. In addition to the actions set out in the Nature Recovery Plan, further actions may be identified, assessed and implemented during the reporting period as opportunities and priorities evolve. It has been assumed that relevant ongoing actions identified in Table 1 will continue throughout this period. A key summary of the Council's key future actions is provided in Table 2 below.

Table 2: Future actions to be taken forward in next five-year reporting period

Theme	Future Action	Lead Departments	Timeline	Notes / Additional Detail
A. Strategic approach to biodiversity	Continued involvement in the delivery of the Oxfordshire LNRS, including transition to delivery, strategic project identification, funding and implementation.	Ecology, Climate	2026	WODC representation on the new LNRS Delivery Advisory Group (from February 2026).
	Liaison with partners on Phase 2 of carbon sequestration project and contribute to the development of a carbon code.	Ecology, Climate	2026	Ongoing county-wide collaboration.
	Continued implementation of the Council's Nature Recovery Plan 2024–2030.	Ecology, Communities, Climate	Ongoing	Actions prioritised by urgency and capacity.

²² <https://www.spacehive.com/movement/westhive>

Theme	Future Action	Lead Departments	Timeline	Notes / Additional Detail
	Review and update of the Nature Recovery Plan, including the roadmap, BNG-specific actions and LNRS references.	Ecology	2026	Some elements require updating.
	Progression of the Local Plan Review, including biodiversity and nature recovery policies.	Planning Policy, Climate	Ongoing	Submission for examination expected by the end of 2026.
	Continued support and funding for the Oxfordshire Local Wildlife Sites Project.	Planning	Ongoing	The project is run in partnership with the Thames Valley Environmental Records Centre (TVERC) and BBOWT
	Support for the designation of new Local Nature Reserves.	Planning	Ongoing	
	Green infrastructure study for selected settlements.	Planning Policy, Climate	2026–27	Long-term aspiration to develop a district-wide strategy.
	Review of the Ubico Service Plan/Schedule to embed biodiversity considerations.	Ecology, Environmental Services & Waste	2026	
	Publication of additional biodiversity specifications and guidance as new topics arise.	Planning	Ongoing	
B. Integration of biodiversity into decision making	Continued review of ecological reports submitted with planning applications.	Planning	Ongoing	Ensures policy compliance.
	Continued provision of ecological training for planning officers.	Planning	Ongoing	Delivered as required.
	Biodiversity audit of Council service areas.	Ecology	2026-2027	Identifies gaps and opportunities.

Theme	Future Action	Lead Departments	Timeline	Notes / Additional Detail
	Continued reduction of glyphosate use.	Assets	Ongoing	Focused on Council-owned land and contracts.
	Maintenance of access to accurate wildlife data through the TVERC Service Level Agreement, incorporating mapping of BNG sites and habitats.	Planning	Ongoing	Supports ecological and wider decision-making, and monitoring of BNG.
	Publication and implementation of the Council's Tree Management Policy.	Planning Policy	2026	Includes requirements for biodiversity enhancement and nature recovery.
	Identification of additional Road Verge Nature Reserves for management by the Council and support ecological monitoring.	Ecology, Assets	2026 - ongoing	In partnership with Oxfordshire County Council.
	Embedding the Oxfordshire LNRS into Council decisions to support nature recovery.	Planning, Climate	2026 – ongoing	Ensuring that the LNRS is widely used to inform decisions.
	Integration of species conservation strategies and protected site strategies into local policy and development management decisions as and when these are progressed by Government	Planning	2026 – ongoing	
C. Actions to improve biodiversity	Promotion of wildflower meadows and best practice verge management with councils and landowners.	Ecology, Assets, Communications	2027	In partnership with Oxfordshire County Council and Wild Oxfordshire.
	Management and enhancement of council-owned land for nature and climate.	Ecology, Assets	Ongoing	
	Review and update of land management plans with volunteer groups (initial five sites).	Ecology, Assets	2026-2027	Informed by 2025 ecological assessments.

Theme	Future Action	Lead Departments	Timeline	Notes / Additional Detail
	Preparation of riparian management plans for Council-owned watercourses.	Ecology, Assets, Flood risk	2026/7	
	Delivery of biodiversity enhancement projects with five schools.	Ecology, Communities	2026	Subject to funding.
	Integration of climate and ecological emergencies into the Community Infrastructure Levy – infrastructure spending schedule and project design criteria for allocating funding to projects.	Planning Policy	2026	Approach aligned with Cotswold District Council.
	Continued support for the Local Environment Groups Conference.	Communities, Ecology	2026-27	Two further events under current Service Level Agreement with Wild Oxfordshire.
D. Engagement, education and partnerships	Continued delivery of bioblitz events across the district.	Ecology	Ongoing	2026 event planned with TVERC and Wild Oxfordshire.
	Support for Plantlife's No Mow May initiative.	Assets	2027	Identification of suitable sites and public engagement.
	Promotion of research opportunities with academic partners, including Oxford University.	Ecology	2026 and ongoing	Focus on biodiversity monitoring.
	Support for town and parish councils in developing biodiversity and climate policies.	Ecology, Climate, Communities	Ongoing	In partnership with Wild Oxfordshire.
	Establishment of a nature and climate group for staff.	Ecology, Climate	2026	Supports training, shared learning and volunteering opportunities.

Theme	Future Action	Lead Departments	Timeline	Notes / Additional Detail
	Identify available town and parish land for nature and climate action.	Ecology, Climate, Communities	2026	Including mapping local growing spaces and encouraging a more sustainable approach.

4 Biodiversity Net Gain Information

4.1 Current Biodiversity Net Gain Actions

Under the Environment Act 2021, Biodiversity Net Gain (BNG) became mandatory for major developments on 12th February 2024 and for minor developments on 2nd April 2025. This legislation requires developers to deliver a minimum 10% net gain for biodiversity as part of development proposals.

This requirement can be achieved via the following mechanisms, either alone or in combination:

- On-site habitat creation and/or enhancements within the development, for example as part of public open space or green infrastructure.
- Off-site habitat creation and/or enhancements outside of the development site boundary, such as on land owned by the developer.
- Purchase of off-site biodiversity units from a suitable provider such as a habitat bank or broker.
- Purchase of statutory biodiversity credits from the Government to be used as a last resort.

The BNG requirement is underpinned by amendments to the Town and Country Planning Act 1990, including a defined list of exemptions. Guidance published by Defra supports developers, local planning authorities and others involved in implementing BNG²³.

To meet the new statutory BNG obligations, WODC has undertaken a set of actions as set out in Table 3 below.

In addition, a BNG working group was established across three local planning authorities, WODC, Cotswold District Council and Forest of Dean District Council through Publica. This group supported the preparation for statutory BNG and development of consistent processes, including validation checklists.

²³ <https://www.gov.uk/government/collections/biodiversity-net-gain>

Table 3: Actions taken to implement and meet BNG obligations

Action	Lead Departments	Timeline	Notes / Additional Detail
Application of the biodiversity gain hierarchy to all non-exempt developments across the district.	Planning	2024	Ensures compliance with statutory BNG requirements.
Attendance at Oxfordshire Local Nature Partnership BNG focus group meetings to share best practice.	Planning, Ecology	2024	Supports shared learning across the county.
Update of planning validation checklists to incorporate BNG requirements.	Planning	2024	Applicants are now required to submit BNG-compliant information.
Creation and publication of a BNG Statement form for planning applicants to summarise their approach.	Planning	2024	Developed in partnership with Publica authorities.
Update of the Council website to include BNG information, including links to Government guidance, definitions and planning application requirements.	Planning	2024-2025	Includes definitions for onsite significant enhancement and strategic significance.
Investment in Mycelia software to support assessment of BNG metrics at the planning application stage and for ongoing monitoring.	Planning, Finance	2023	Improves accuracy and efficiency of metric calculations.
Delivery of BNG training to ecologists and planning officers, including enforcement.	Planning	2024, 2025 and ongoing	Ensures staff remain up to date with processes and legislation.
Training for planning validation team, including use of Mycelia.	Planning	2024	Supports correct validation of BNG submissions.
Recruitment of three FTE planning ecologists to support BNG advisory work.	Planning	2025	Ecology team provides advice to officers, applicants and agents.
Review of planning applications to ensure BNG information is accurate, realistic and achievable.	Planning, Ecology	2024	Ecology team reviews technical details of BNG proposals.

Action	Lead Departments	Timeline	Notes / Additional Detail
Separation of Biodiversity Gain Plan discharge applications from other compliance applications to support effective monitoring.	Planning	2024	Improves oversight and tracking of BNG delivery.
Delivery of a Developer and Agents Forum session, including an introduction to BNG and follow-up advice.	Planning	Sept 2024	Supports awareness and compliance among developers.
Preparation of the first Section 106 agreement for a habitat bank.	Ecology, Legal	2022–2025	Establishes mechanisms for off-site BNG delivery.
Executive decision to delegate authority to Head of Planning for future habitat bank Section 106 agreements.	Planning	Feb 2025	Streamlines approval of habitat banks.
Inclusion of a BNG informative on planning permission decision notices.	Planning	2024	Ensures applicants are aware of their ongoing BNG responsibilities.
Initiation of a BNG monitoring strategy to understand how best to monitor on-site delivery and habitat banks.	Ecology	Ongoing	Development of a long-term monitoring approach.
Participation in Oxfordshire Local Nature Partnership BNG focus group discussions on off-site market integrity and habitat bank quality assurance, contributing to the development of the Oxfordshire 'NatureMark' ²⁴ .	Ecology	2025 and ongoing	<i>NatureMark</i> provides optional quality assurance for habitat banks.
Publication of BNG monitoring fees for significant on-site enhancements and off-site habitat banks.	Planning, Finance	Nov 2025	Establishes a charging mechanism for monitoring duties

²⁴ <https://www.olnp.org.uk/biodiversity-net-gain-bng-sites-in-oxfordshire>

Action	Lead Departments	Timeline	Notes / Additional Detail
Collaboration with Oxfordshire County Council and the other supporting authorities on the LNRS delivery and its functions relating to BNG.	Ecology	2024-25	Supported development of guidance for planning officers and Local Plan policy.

4.2 Approved Biodiversity Gain Plan Outcomes

The outcomes from the approved Biodiversity Gain Plans are summarised in the tables below. This data has been generated using the Verna Mycelia software, which the Council uses to support effective screening of biodiversity metrics submitted within planning applications and to enable ongoing monitoring of compliance with approved Biodiversity Gain Plans. The information is presented in a series of summary tables aligned with the specific data outputs from Mycelia.

Table 4: Biodiversity Gain Plans approved in the reporting period

Measure	Number	Proportion (%)
Total number of biodiversity gain plans approved in the reporting period	19	Not applicable
Total number of biodiversity gain plans approved in the reporting period securing BNG through on-site units only	13	68.42
Total number of biodiversity gain plans approved in the reporting period securing BNG through off-site units only	0	0.00
Total number of biodiversity gain plans approved in the reporting period securing BNG through statutory credits only	0	0.00
Total number of biodiversity gain plans approved in the reporting period securing BNG through a combination of on-site and off-site units	6	31.58
Total number of biodiversity gain plans approved in the reporting period securing BNG through a combination of on-site units and statutory credits	0	0.00

Measure	Number	Proportion (%)
Total number of biodiversity gain plans approved in the reporting period securing BNG through a combination of off-site units and statutory credits	0	0.00
Total number of biodiversity gain plans approved in the reporting period securing BNG through a combination of on-site, off-site units and statutory credits	0	0.00
Total number of biodiversity gain plans approved in the reporting period where the on-site change negatively impacts irreplaceable habitats	0	0.00

Table 5: Overall expected gains and losses in approved Biodiversity Gain Plans

Measure	Area habitats	Hedgerow	Watercourse
Total number of pre-development biodiversity units approved on-site	33.17	4.11	0.00
Total number of post-development biodiversity units approved on-site	46.80	7.61	0.00
Total net unit change in biodiversity units, on-site	13.63	3.50	0.00
Average percentage (%) change in biodiversity units, on-site	41.09	85.14	0.00
Total number of baseline biodiversity units approved off-site	1.61	0.00	0.00
Total number of post-intervention biodiversity units approved off-site	4.23	0.13	0.00
Total net unit change in biodiversity units, off-site	2.62	0.13	0.00
Average percentage (%) change in biodiversity units, off-site	162.82	0.00	0.00
Total number of biodiversity units offset using statutory credits	0.00	0.00	0.00
Total net unit change in biodiversity units (including any units offset using credits)	16.25	3.63	0.00
Average percentage (%) change (including statutory credits)	46.73	88.20	0.00

Table 6: Location of off-site biodiversity units

Measure	Total	Proportion (%)
Number of off-site biodiversity units located inside LPA boundary or NCA of impact site	1.46	34.71
Number of off-site biodiversity units located outside LPA or NCA of impact site, but in neighbouring LPA or NCA	1.35	32.06
Number of off-site biodiversity units located outside of LPA or NCA of impact site and neighbouring LPA or NCA	1.40	33.23

Table 7: Composition of biodiversity gains for area habitats

Habitat Type – Area	Total baseline biodiversity units	Total hectares at baseline	Total biodiversity units post - development	Total hectares post - development	Net change in biodiversity units	Net change in hectares
Cropland	2.47	1.21	1.89	1.08	-0.57	-0.13
Grassland	22.76	7.07	28.99	5.16	6.23	-1.90
Heathland and shrub	0.04	0.01	1.54	0.21	1.50	0.20
Lakes	0.00	0.00	0.00	0.00	0.00	0.00
Sparsely vegetated land	0.38	0.19	0.00	0.00	-0.38	-0.19
Urban	0.91	1.74	0.88	2.68	-0.03	0.94
Wetland	0.00	0.00	0.00	0.00	0.00	0.00
Woodland and forest	0.92	0.21	6.66	1.28	5.74	1.07
Intertidal sediment	0.00	0.00	0.00	0.00	0.00	0.00

Habitat Type – Area	Total baseline biodiversity units	Total hectares at baseline	Total biodiversity units post - development	Total hectares post - development	Net change in biodiversity units	Net change in hectares
Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00	0.00
Rocky shore	0.00	0.00	0.00	0.00	0.00	0.00
Coastal lagoons	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal hard structures	0.00	0.00	0.00	0.00	0.00	0.00
Watercourse footprint	Not applicable	0.00	Not applicable	0.00	Not applicable	0.00
Individual trees	7.18	0.78	10.93	1.83	3.75	1.05
Total	34.65	11.22	50.89	12.25	16.23	1.03

Table 8: Composition of biodiversity gains for hedgerows and lines of trees

Habitat type - hedgerows and lines of trees	Total biodiversity units at baseline	Total kilometres at baseline	Total biodiversity units post - development	Total kilometres post - development	Net change in biodiversity units	Net change in kilometres
Species-rich native hedgerow with trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow with trees	0.97	0.08	1.26	0.08	0.29	0.00
Species-rich native hedgerow - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00

Habitat type - hedgerows and lines of trees	Total biodiversity units at baseline	Total kilometres at baseline	Total biodiversity units post - development	Total kilometres post - development	Net change in biodiversity units	Net change in kilometres
Native hedgerow with trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow	0.00	0.00	6.09	0.53	6.09	0.53
Native hedgerow - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow with trees	0.00	0.00	0.00	0.00	0.00	0.00
Ecologically valuable line of trees	0.00	0.00	0.00	0.00	0.00	0.00
Ecologically valuable line of trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow	3.02	0.59	0.28	0.13	-2.74	-0.46
Line of trees	0.00	0.00	0.00	0.00	0.00	0.00
Line of trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Non-native and ornamental hedgerow	0.12	0.12	0.10	0.11	-0.02	-0.02
Total	4.11	0.79	7.74	0.85	3.63	0.06

4.3 Local Biodiversity Net Gain market support

The Council has supported the establishment of habitat banks within West Oxfordshire.

Habitat banks are sites where habitats are created or enhanced to generate off-site biodiversity units. These units can be purchased by developers to meet the statutory 10% BNG requirement, where it cannot be fully delivered within the development site (“onsite”). To legally sell biodiversity units, habitat bank owners or operators must secure a legal agreement – either a Section 106 agreement planning obligation with a local planning authority or a Conservation Covenant with a Responsible Body – and register their site with Natural England so that it appears on the National Gain Site Register²⁵. The register is a publicly accessible platform to record, allocate and monitor the sale of biodiversity units and link them to specific planning permissions.

In West Oxfordshire, there are three habitat banks. Two of these have been, or will be, secured through Section 106 agreements and one through a Conservation Covenant.

In line with the Council’s Scheme of Delegation, the Development Control Committee approved the first habitat bank Section 106 agreement and resolved to delegate authority for future habitat bank agreements to the Head of Planning thereafter at its meeting on 24th February 2025²⁶.

- Pudlicote Farm habitat bank S106 agreement signed and sealed February 2025²⁷.
- Radford Farm habitat bank S106 agreement due to be signed and sealed in February 2026²⁸.
- Cornwell Estate habitat bank: although a Section 106 agreement was in progress, this site was registered separately under a Conservation Covenant²⁹

In addition, three other potential habitat banks are under consideration with initial discussions having taken place with landowners and relevant organisations.

²⁵ <https://www.gov.uk/guidance/search-the-biodiversity-gain-sites-register>

²⁶ <https://meetings.westoxon.gov.uk/ieListDocuments.aspx?Cid=1141&Mid=2546&Ver=4>

²⁷ <https://news.westoxon.gov.uk/news/council-helps-to-establish-new-habitat-bank-at-pudlicote-farm>

²⁸ <https://trustforoxfordshire.org.uk/biodiversity-net-gain/our-habitat-banks/>

²⁹ <https://www.environmentbank.com/habitat-banks/cornwell-habitat-bank/>

4.4 Meeting BNG Obligations in the next reporting period

A summary of the actions to be undertaken over the next five-year reporting period to meet statutory BNG is provided in Table 4 below. This includes the publication of a habitat bank establishment procedure to ensure that consistent due diligence checks and consultations are carried out for all future requests.

Table 9: Actions to meet BNG obligations in the next reporting period

Future Action	Team Responsible	Timeframe
Continue to assess and support the establishment of new habitat banks in the district as and when they are submitted to the Council.	Planning	2026
Publication of a habitat bank establishment procedure to ensure due diligence and consistency for all future requests.	Ecology	By end of 2026
Assessment and review of new habitat banks in accordance with the new procedure.	Planning	2026 and ongoing
Continue to support staff to undertake relevant training, including ecology, planning, validation and enforcement.	Planning, Legal	Ongoing
Continue to review planning applications to ensure BNG information is accurate, realistic, achievable and appropriate.	Ecology, Development Management	Ongoing
Continue to review Biodiversity Gain Plans, metrics and associated discharge of condition information to ensure accuracy and appropriateness.	Ecology, Development Management	Ongoing
Continue to ensure that the biodiversity gain hierarchy has been considered in all applications subject to BNG.	Ecology, Development Management	Ongoing
Continue to review Biodiversity Statements and ensure that at least 10% BNG can be achieved before granting planning permission.	Ecology, Planning (including validation)	Ongoing

Future Action	Team Responsible	Timeframe
Review and update BNG guidance on the Council's website, particularly in response to new and emerging guidance and legislation.	Planning, Ecology	2026
Incorporate BNG and nature recovery policies into the new Local Plan, including feasibility of increasing the BNG objective to 20% for major developments within the LNRS mapped network and consider policies to improve the quality of BNG design and effective delivery.	Planning Policy	2026
Create BNG maps showing on-site and off-site BNG delivery (with TVERC), and add to the constraints layer in Uniform, and use to support ongoing monitoring and reporting.	Ecology, ICT, GIS	2026 and ongoing
Assess applications to ensure that LNRS opportunities are incorporated into BNG proposals within planning applications and for all new habitat banks.	Planning, Ecology	2026 and ongoing
Review Biodiversity Gain Plans and Habitat Management and Monitoring Plans (HMMPs).	Ecology, Planning Enforcement, Legal	2026 and ongoing
Prepare and publish a BNG monitoring strategy for on-site significant enhancements and habitat banks.	Ecology, S106 monitoring team	2026-27
Continue to monitor all development sites with on-site significant enhancements.	Planning, Legal	Ongoing
Consider new software and project management systems to enable effective monitoring of BNG through development management and for the 30-year statutory period.	Planning	Ongoing
Consider adding a BNG-specific pre-application advice service which will enable developers to better understand the potential implications of delivering BNG through their proposed developments.	Planning	2026-27
Report to Defra in accordance with published guidance.	Planning	2030/31

5. Getting involved in biodiversity and nature recovery in West Oxfordshire

The Council's Ecology Team can provide advice and support to town and parish councils/meetings and community groups who would like to create, restore and enhance habitats for wildlife, particularly where this contributes towards the delivery of the Oxfordshire LNRS, in partnership with the Community Ecology Team at Wild Oxfordshire³⁰. If you would like to find out more, please contact ecology@westoxon.gov.uk



Apple blossom © M. Dodd



Marbled white butterfly © M. Dodd



Great crested newt pond © M. Dodd

If you are interested in learning more about or becoming involved with biodiversity and nature recovery in West Oxfordshire, please visit:

- <https://www.westoxon.gov.uk/media/nvtbk0ob/nature-recovery-plan-2024-to-2030.pdf>
- <https://www.wildoxfordshire.org.uk/guidance/community-groups>
- <https://www.oxfordshire.gov.uk/residents/environment-and-planning/local-nature-recovery-strategy-lnrs>
- <https://www.olnp.org.uk/nature-recovery>
- <https://www.cagoxfordshire.org.uk/oxfordshire-nature-project>
- <https://www.bbowt.org.uk/team-wilder/community-groups>
- <https://www.tverc.org/get-involved>

³⁰ <https://www.wildoxfordshire.org.uk/projects/community-ecology>

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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>HOMESEAKERPLUS POLICY REVIEW</p>
<p>Wards affected</p>	<p>All</p>
<p>Accountable member</p>	<p>Cllr Geoff Saul, Executive Member for Housing and Social Care Email: Geoff.saul@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Jon Dearing, Executive Director Operations Email: jon.dearing@publicagroup.uk</p>
<p>Report author</p>	<p>Caroline Clissold, Business Manager Housing Email: caroline.clissold@publicagroup.uk</p>
<p>Summary/Purpose</p>	<p>The HomeseekerPlus Policy has been in place since 2016 and was last reviewed in 2022.</p> <p>Due to legislative and other changes, the policy needs to be updated. It is considered good practice to consult the public and associated stakeholders on the new policy therefore the HomeseekerPlus partnership is seeking approval to consult and implement suggested changes.</p> <p>Although there is no recommended or set timeframes for how often allocations policies should be reviewed, it is anticipated that this the newly reviewed HomeseekerPlus Policy will remain in place until after the completion of the Local Government Reorganisation.</p>
<p>Annexes</p>	<p>Annex A – Equalities Impact Statement Annex B – SIAT Outcome</p>
<p>Recommendation(s)</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> 1. Approve the draft Policy for public consultation 2. Delegate authority to the Business Manager Housing in

	consultation with Executive Member for Housing and Social Care and Publica Executive Director – Operations to adopt the new policy following consideration of the consultation results
Corporate priorities	<ul style="list-style-type: none"> • Putting Residents First • A Good Quality of Life for All • Working Together for West Oxfordshire
Key Decision	YES
Exempt	NO
Consultees/ Consultation	The HomeseekerPlus Partnership will undertake a full public consultation to run for 4 weeks to seek views on the proposed Policy amendments and to ensure that residents, stakeholders and all other interested partners are able to have their say.

1. EXECUTIVE SUMMARY

- 1.1** HomeseekerPlus is a choice-based lettings (CBL) scheme run by the seven local authorities in partnership with social housing landlords operating within Gloucestershire and West Oxfordshire.
- 1.2** The seven local authorities are West Oxfordshire District Council, Gloucester City Council, Cheltenham Borough Council, Stroud District Council, Forest of Dean District Council, Cotswold District Council and Tewkesbury Borough Council.
- 1.3** Demand for affordable social housing within the HomeseekerPlus area is very high so any allocations policy must be fair, transparent and prioritise those in housing need. The policy explains who is eligible and qualifying to apply on HomeseekerPlus and sets out how applications will be assessed based on housing need.
- 1.4** Due to legislative and other changes, the policy needs to be updated. It is considered good practice for the partnership to consult the public and associated stakeholders on the new policy.

2. BACKGROUND

- 2.1** The Ministry of Housing and Local Communities (MHCLG) sets out Statutory Guidance relating to the fair and transparent allocation accommodation in the 'Allocation of Accommodation: Guidance for Local Authority's' document. The introduction of the Homelessness Reduction Act 2017 has also impacted on how those applicants who are threatened with homelessness or are homeless should be assessed. Homeless applicants are given reasonable preference for social rented allocations.
- 2.2** Local Authorities are tasked with ensuring that all affordable and social rented accommodation made available through its Choice Based Lettings scheme is allocated fairly, transparently and to those in the highest housing need.
- 2.3** HomeseekerPlus is a choice-based lettings (CBL) scheme run by the seven local authorities in partnership with the Social Housing Landlords operating within Gloucestershire and West Oxfordshire. This enables Social Housing Landlords to advertise their homes and for applicants to bid for properties they are interested in. The HomeseekerPlus Policy was created to provide the framework for making those decisions and to ensure that all its partners were acting in a consistent way.
- 2.4** The Policy explains who is eligible and who qualifies to apply on HomeseekerPlus and sets out how applications will be assessed and awarded a subsequent Emergency, Gold, Silver or Bronze banding based on housing need.
- 2.5** A full review of the Policy, including a public consultation was carried out in 2022, however since then there have been further legislative changes. Officer working groups have also identified some inconsistencies in language requiring clarification as well as best practice changes learnt over the years since the previous review.
- 2.6** To remove ambiguity, add clarity and explore wider options for groups such as Armed Forces Veterans an updated Policy is being proposed.

- 2.7 The partnership is seeking approval from each of its own governance systems to run a public consultation regarding these proposed changes. This consultation will run through May 2026.
- 2.8 The Forest of Dean District Council is the Lead Authority responsible for HomeseekerPlus so will coordinate the consultation on behalf of the partnership.

3. PROPOSED CHANGES

3.1 A summary of the major changes is outlined below:

Qualification Criteria

- Shift in assessment of financial resources from ability to purchase a property to assess whether applicants have sufficient resources to access housing that meets their needs across multiple tenure types.
- Applicants who deliberately worsen their housing situation will be placed in lowest priority band for 6 months. After this period, they can only move to a higher band if they demonstrate reasonable steps to find alternative housing and actively try to resolve their situation.
- Only the main or joint applicant's employment (not other household members) would count toward establishing local connection, except in exceptional circumstances.
- Expand Armed Forces local connection options for members/former members can apply for connection to all HomeseekerPlus partners or select specific partners.
Should this expansion be:
 - **opt-in** (choose districts),
 - **opt-out** (automatic for all partners unless applicant opts out), or;
 - **No change** beyond current legislation.

Assessment and Prioritisation

- Higher banding will only be awarded if applicants act on reasonable professional advice; the Lead Authority decides what is reasonable.
- Emergency banding for downsizing would only apply if the move released a property in high demand or limited supply (currently awarded automatically for moves from family to non-family housing).
- Time-limited bands: set a fixed 6-month demotion period for applicants who do not act urgently. Reassess after 6 months, if no reasonable steps have been taken, lower banding remains indefinitely until evidence of improvement provided.
- Additional bedroom need:
 - add category for couples unable to share a bedroom due to medical/disability reasons (assessment may consider alternatives e.g. separate beds).
 - 3rd trimester of pregnancy

3.2 There are a number of other minor changes however these are predominately housekeeping updates to sections already contained within the policy such as:

- Clarity on data protection arrangements
- Updates on who is /is not eligible to register in line with immigration control legislation
- Clarity on applicant's responsibilities to provide correct and up-to-date information
- Clarity on how banding start dates are applied
- The Review and Appeals processes

4. CONSULTATION

- 4.1** It is proposed to consult the public on the policy for 4 weeks in May 2026 which will ensure an open, transparent and fair process.
- 4.2** The consultation will seek comments from the public and a range of stakeholders on the proposed changes in Policy
- 4.3** The Forest of Dean District Council is the Lead Authority responsible for HomeseekerPlus so will coordinate the consultations on behalf of the partnership.

5. ALTERNATIVE OPTIONS

- 5.1** In order to ensure an open, transparent and fair process to changes in Policy there are no other alternative options.

6. CONCLUSIONS

- 6.1** To remove ambiguity, add clarity and explore wider options for groups such as Armed Forces Veterans an updated Policy is being proposed
- 6.2** Approval is sought from Executive to carry out a public consultation regarding these proposed changes. It is anticipated that the consultation will run for 4 weeks in May 2026
- 6.3** Further approval is sought from Executive to delegate authority to the Business Manager Housing in consultation with the Executive Member for Housing and Social Care and the Publica Executive Director of Operations to adopt the new policy following consideration of the consultation responses
- 6.4** Should the outcome of the consultation differ significantly or raise strong objections to any of the points under consideration, a further report will be brought forward to Executive to consider.

7. FINANCIAL IMPLICATIONS

- 7.1** The adoption of the updated HomeseekerPlus Policy will have no financial implications.

8. LEGAL IMPLICATIONS

- 8.1** The Housing Act 1996, Part VI ("the Act") sets out Local Authority responsibilities in the Allocation of Housing Accommodation. S166a of the Act states that 'Every local housing

authority must have a scheme (their ‘allocation scheme’) for determining priorities and as to the procedure to be followed in allocating housing accommodation.’

- 8.2 The Localism Act 2011 introduced significant amendments to the Act including Section 166a, amongst others, but notably: To include assurance that certain categories of applicants are given reasonable preference including ex-Armed Forces personnel and their families (s166A(3)) or consideration of anti-social behaviour (s166A(5)(b)).
- 8.3 The requirement for an allocation scheme to contain a statement of the Authority’s Policy on offering a choice of accommodation or an opportunity to express preferences about their accommodation (section 166a (2))
- 8.4 Publica’s Legal Team have reviewed all proposed changes, as have One Legal on behalf of all the other partners and have deemed them compliant with current legislation.

9 RISK ASSESSMENT

- 9.1 Should all seven HomeseekerPlus Partners not agree to the Policy update, this may result in dissolution of the Partnership
- 9.2 If the Partnership dissolves due to non-agreement, the financial implications would be significant, with increased costs for each of the partnership organisations.
- 9.3 The HomeseekerPlus partnership offers a strong approach to the allocation of social rented accommodation.
- 9.4 It is unlikely that any new administration will have a new common choice-based lettings system and policy in place following Local Government Reorganisation (LGR) therefore the HomeseekerPlus partnership is likely to continue beyond vesting day.
- 9.5 Dissolving the partnership prior to LGR could cause additional costs and potential unnecessary uncertainty and disruption to both staff and applicants.
- 9.6 To not bring the HomeseekerPlus Policy up to date with recent legislation changes could leave the Partner Authorities open to legal challenge or criticism should a complaint escalate to the Local Government and Social Care Ombudsman.

10. EQUALITIES IMPACT

- 10.1 Equalities Impact Assessment has been carried out – Annex A

11. SUSTAINABILITY IMPLICATIONS

- 11.1 SIA summary- Annex B

12. BACKGROUND PAPERS

- 12.1 None

(END)

Equality and Rurality Impact Assessment Form

When completing this form you will need to provide evidence that you have considered how the ‘protected characteristics’ may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet

Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Thomas See/Caroline Clissold	
Date of assessment: 26 January 2026	Telephone: Email:

2. Name of the policy, service, strategy, procedure or function:

HomeseekerPlus Common Allocations Policy Document
Is this a new or existing one? Existing

3. Briefly describe it aims and objectives

<p>The HomeseekerPlus Allocations Policy aims to:</p> <ul style="list-style-type: none"> • Ensure fairness, transparency, and equality of opportunity in the allocation of social housing. • Prioritise households with the greatest housing need, while supporting sustainable communities. • Provide applicants with informed choice and accessible processes, including support for less able applicants. • Make best use of available housing resources, including enabling mobility within social housing and giving priority to those with a local connection where appropriate. • Help local authorities meet their statutory duties under housing and homelessness legislation. • Contribute to tackling discrimination and promoting inclusion across Gloucestershire and West Oxfordshire.
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HomeseekerPlus is a sub-regional housing allocations scheme using choice-based lettings that operates across Gloucestershire and West Oxfordshire to oversee the allocation of social housing in the area.

4. Are there any external considerations? (e.g. Legislation/government directives)

The policy is regularly reviewed to make sure it reflects:

- national policy and legislation
- new case law,
- local policy changes, and
- local housing need/supply

Since the policy was last reviewed, amended and adopted in March 2022, there have been some external considerations that need to be taken into account.

These include (not exhaustive):

- The Allocation of Accommodation: Guidance for Local Authorities in England (2020) has been revised in 2025. The updated version includes strengthened provisions for domestic abuse survivors, care leavers, and Armed Forces personnel.
- A new statutory instrument — The Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse and Care Leavers) (England) Regulations 2025
- Cheltenham Borough Council – new Housing, homelessness and rough sleeping strategy 2023 – 2028
- Cotswold District Council - Preventing homelessness strategy 2025-2030
- Stroud – new Housing, homelessness & rough sleeping strategy 2024-2029
- Tewkesbury Borough Council housing and homelessness strategy 2022-26
- Forest of Dean District Council – new Preventing homelessness strategy 2025
- West Oxfordshire – new Preventing homelessness strategy 2025-2028

The proposed changes result from the latest review of the policy. The HomeseekerPlus partnership is governed by a HomeseekerPlus Management Board. The Board includes representatives from all of the partner Councils. All of the changes have been considered and agreed by HomeSeekerPlus Management Board.

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	✓	<ul style="list-style-type: none"> Demographic data extracted from the Locata housing allocations software system Census 2021 data on: sex; age; religion; race; disability
Recent research findings including studies of deprivation	✓	<ul style="list-style-type: none"> 6 of the 7 participating councils within the HomeseekerPlus Scheme have published new housing and/or homelessness strategies over the last 3 years. There will be research and data underpinning and informing these, especially strategies covering homelessness. There is a legal requirement to complete a comprehensive review of homelessness in your area to inform your homelessness strategy. These strategies have informed and been a point of reference for the allocations policy development.
Results of recent consultations and surveys	✓	<ul style="list-style-type: none"> Where significant changes are proposed to a housing allocations scheme, the housing authority must ensure that affected customers and Registered Provider partners are informed within a reasonable timeframe and that appropriate consultation is undertaken. A 4 week consultation process as outlined above will be undertaken using Survey Monkey and links provided to all current applicants. Additional stakeholder engagement sessions will also be held during the consultation process.
Results of ethnic monitoring data and any equalities data	✓	<ul style="list-style-type: none"> Equalities monitoring data from the Locata housing allocations software system
Anecdotal information from groups and agencies within Gloucestershire	✓	<ul style="list-style-type: none"> The 4-week consultation includes requesting feedback from: Registered Provider partners operating in the area; County Councils; NHS; Social Care; Internal colleagues.

Comparisons between similar functions / policies elsewhere	✓	<ul style="list-style-type: none"> • ARK Housing consultancy supported part of the process of reviewing the current HomeseekerPlus allocations scheme/policy. ARK support reviews of council housing allocations schemes across the country so bring knowledge of other policies and practice for comparison.
Analysis of audit reports and reviews	✓	<ul style="list-style-type: none"> • The allocation of social housing processes include a legal right to review decisions made in relation to processing housing applications and allocation of social housing. Representatives on the HomeseekerPlus Partnership Board have used data on review decisions to inform the proposed changes to the policy.
Other:	✓	<ul style="list-style-type: none"> • Trends and data relating to complaints and the Ombudsman has also been taken into account.

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6. Please specify how intend to gather evidence to fill any gaps identified above:

No gaps – see above.

7. Will any consultation been carried out?

Yes -

Details of Consultation

Where significant changes are proposed to a housing allocations scheme, the housing authority must ensure that affected customers and Registered Provider partners are informed within a reasonable timeframe and that appropriate consultation is undertaken. A 4-week consultation process will be undertaken using Survey Monkey and and links provided to all current applicants. Additional stakeholder engagement sessions will also be held during the consultation process.

If NO please outline any planned activities

8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	<input checked="" type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
<p>Comments: e.g. Who will this specifically impact? The policy changes include some amendments to ‘tidy’ the document up, provide procedural clarity and improved transparency. These changes are not considered material. These changes should help staff giving them more clarity regarding the policy and enabling them to apply it consistently.</p> <p>There are some more major changes proposed. The majority of these changes are NOT likely to impact a large number of applicants although limited data is available to quantify this. The changes are outlined below:</p> <ul style="list-style-type: none"> ● Who does not Qualify: We are considering a change to how we assess who may not qualify for social housing. We are considering whether all tenure types should be considered when assessing if applicants have sufficient financial resources to adequately resolve their own housing need. Previously, this was limited to whether an applicant had sufficient financial resources to resolve their housing needs by purchasing a property. This change is not likely to impact a specific group of applicants but will impact households across the scheme in a range of circumstances/with a range of characteristics if they have financial means to resolve their own housing needs. ● Deliberate worsening of circumstances: we are considering a change to how deliberate worsening of circumstances is treated. These applicants would be placed in the lowest priority band (Bronze) for six months. After that, they would only move to a higher band if they can show they have taken all reasonable steps to find alternative accommodation and actively tried to resolve their situation. This change is not likely to impact a specific group of applicants but will impact households across the scheme in a range of circumstances/with a range of characteristics if they have deliberately worsened their circumstances. ● Acting on professional advice: A new rule is being considered to ensure applicants follow reasonable steps before a higher banding is awarded. Applicants are sometimes given advice or recommendations by the Council or other professionals to help improve their housing situation. Under this proposal, if applicants choose not to follow reasonable steps, they may not be awarded a higher banding ● Employment & local Connection: HomeseekerPlus is reviewing how employment is used to establish local connection. At present, any household member included on an application who works in the district can help establish a local connection. Under the proposed change, only the main or joint applicant’s employment would count — unless there are exceptional circumstances. 	

- **Expanding Local Connection Options for members of the Armed Forces:** Recent legislation has come into effect regarding the exemption of all members and former members of the Armed Forces from the Local Connection test. This has been implemented and all applicants who meet the criteria are awarded a local connection to a Local Authority of their choosing. We are proposing to expand this further to allow members or former members of the Armed Forces the opportunity to apply for a local connection to all the HomeseekerPlus partners, or to choose some of the partners who they would like to be given a local connection to. This is not likely to apply to many applicants, however as this is being offered over and above legislation and to a specific demographic and not to all applicants generally, could disproportionately affect others.
- **Emergency banding for downsizing:** Emergency Banding is sometimes awarded to social housing tenants who agree to move to smaller housing. At present, social housing tenants in Gloucestershire and West Oxfordshire who are willing to move from family accommodation to non-family housing within the partnership area are automatically awarded Emergency Banding. The proposed change is that this banding would only be awarded if the move releases a property that is in high demand or limited supply.
- **Additional bedroom need:** To allow couples who cannot share a bedroom due to medical or disability reasons to be awarded an additional bedroom. In these cases, consideration may be given to whether separate single beds could resolve the issue without needing an extra bedroom.
- **Demotion Period & Reassessment:** Some categories of housing need are time limited to recognise urgency. Applicants in these categories are expected to bid for all suitable properties each week and across a wide range of locations. If, at the end of the time limited period, it appears that an applicant is waiting for a particular property and not treating their circumstances as urgent, they may be demoted to a lower banding. At present, demotion periods vary case by case. The proposed change is to set a fixed demotion period of 6 months. After this, the local authority would reassess the applicant’s situation. If the applicant has not taken all reasonable steps to resolve the issue that led to the demotion, the lower banding would remain in place indefinitely until sufficient evidence is provided.
- **Additional Bedroom for pregnant households:** The current policy does not recognise unborn children as part of the bedroom need assessment until their birth. It is proposed that households who currently have a one bed housing need and include a pregnant applicant will be assessed as needing an additional bedroom once the pregnancy reaches 28 weeks / the start of the third trimester.

9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

Negative – it could disadvantage and therefore potentially not meet the General Equality duty;

Positive – it could benefit and help meet the General Equality duty;

Neutral – neither positive nor negative impact / Not sure

	Potential Negative	Potential Positive	Neutral	Reasons	Options for mitigating adverse impacts
Age – Young People			X	The proposed changes are anticipated to have a neutral impact on younger people on the housing	

				register/HomeseeckerPlus scheme. 70% of people on the housing register/HomeseeckerPlus scheme are aged 20-49 years. More younger people are applying to join the housing register/HomeseeckerPlus scheme in Gloucester City.	
Age – Old People	X	X	X	<p>There are limited numbers of older people on the Housing register/HomeseeckerPlus scheme. For those that are on the register/scheme the changes are anticipated to have a mixed impact – see below.</p> <ul style="list-style-type: none"> • The change in emergency banding for downsizing is more likely to have a negative impact on older people as they are more likely to be under-occupying family housing than younger households. • The change related to an additional bedroom is more likely to have a positive impact on older people as the prevalence of disability and medical issues increases with age. • The employment and local connection change is likely to have a neutral impact on older people as they are less likely to be working or have working children in their household who the change would apply to. 	<ul style="list-style-type: none"> • Retain Emergency Banding where downsizing releases larger family homes or adapted properties in high demand. • Allow discretion for older or disabled tenants where moving supports health, mobility, or independence. • Publish clear guidance with examples so applicants understand when Emergency Banding applies. • Monitor Emergency Banding awards by age profile and review criteria if older tenants are disproportionately affected.
Disability		X		<ul style="list-style-type: none"> • Additional bedroom need: allowing those households who cannot share a bedroom due to medical or disability reasons to be awarded an additional bedroom should have a positive impact on applicants on the housing register/HomeseeckerPlus scheme. 	

				There are just over 6,000 households registered on the HomeseekerPlus scheme with a disability, but we do not hold data on how many of these would benefit from the proposed new category for being awarded an additional bedroom.	
Sex – Male			X	Changes proposed are not anticipated to have a specific impact on applicants according to gender.	
Sex – Female			X		
Race including Gypsy and Travellers			X	The race of applicants on the housing register is predominantly white – more so than England as a whole but this is reflective of the wider population of the area. The only slight variation is that in Gloucester City there are less white persons and more Black or Mixed Ethnic group households than the wider population in that area. There are very limited numbers of GRT households on the housing register/HomeseekerPlus scheme. GRT groups can be disadvantaged by local connection criteria so it has been recommended that working procedures clarify that special circumstances in relation to the local connection qualification criteria should apply to GRT households so that the local connection requirement does not apply to these households.	Procedures will clarify that local connection requirements do not disadvantage GRT households, with officer training and monitoring to ensure consistency
Religion or Belief			X	Changes proposed are not anticipated to have a specific impact on applicants according to religion.	

Sexual Orientation			X	Only 388 applicants completed the sexuality field on their housing application so this data is not statistically reliable. However, the changes proposed are not anticipated to have a specific impact on applicants according to sexual orientation.	
Gender Reassignment			X	Changes proposed are not anticipated to have a specific impact on applicants according to gender reassignment.	
Pregnancy and maternity			X	There were nearly 600 households on the housing register/HomeseekerPlus scheme who included a pregnant woman. However, the changes proposed are not anticipated to have a specific impact on applicants according to pregnancy & maternity.	
Geographical impacts on one area			X		
Other Groups			X		
Rural considerations: ie Access to services; leisure facilities, transport; education; employment; broadband.			X	None of the changes are specific to geography and not expected to impact rural areas more than urban areas.	

10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale
Downsizing change: Draft clear guidance on when Emergency Banding applies, with examples, including safeguards for older/disabled tenants.	HomeseekerPlus Policy Lead	Officer time	Before policy implementation

Ensure discretion is retained for older/disabled tenants where downsizing supports health, mobility, or independence	Local Authority Housing Managers	Existing staff capacity	Ongoing from implementation
Monitor Emergency Banding awards for downsizing by age profile and report to Partnership Board	HomeseekerPlus Data Analyst	Locata system data Officer time	Quarterly monitoring reports
Train staff on equality considerations in banding decisions, including trauma-informed and disability-aware practice	HomeseekerPlus Partnership Training Lead	Training budget	Within 6 months of implementation
Review outcomes after 12 months; adjust criteria if older tenants are disproportionately affected	HomeseekerPlus Management Board	Officer time	12 months post-implementation

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11. Is there is anything else that you wish to add?

Research into creating this EIQ was carried out by ARK Consultancy on behalf of the HomeseekerPlus Partnership

Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed By:	Thomas See/ Caroline Clissold	Date:	26/01/2026
Line Manager:	Jon Dearing	Date:	26/01/2026

Reviewed by Corporate Equality Officer:	Cheryl Sloan	Date:	29/01/2026
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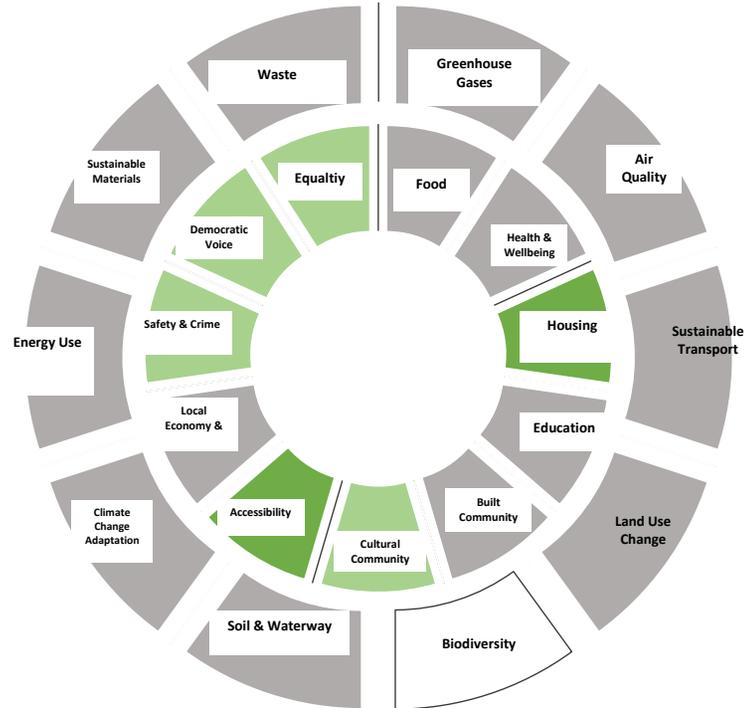
Project Brief

Permission to consult on, then implement changes to the current Choice Based Lettings policy - HomeseekerPlus

Criteria	Score	Justification
Energy Use	0	No Climate / Sustainability Impact
GHGs	0	HomeseekerPlus Policy Review relates to the allocation of existing properties owned by Housing Providers so has no Climate / Sustainability Impact.
Air quality	0	No Climate / Sustainability Impact
Land use change	0	No Climate / Sustainability Impact
Soil and waterway health	0	No Climate / Sustainability Impact
Waste	0	No Climate/ Sustainability Impact
Sustainable Transport	0	No Climate / Sustainability Impact
Biodiversity	0	No Climate /Sustainability Impact
Climate Change Adaptation	0	No Climate / Sustainability Impact
Sustainable Materials	0	No Climate / Sustainability Impact
Food	0	HomeseekerPlus Policy Review relates to the allocation of existing properties owned by Housing Providers so has no Climate/Sustainability Impact
Health	0	As above
Housing	4	HomeseekerPlus is the Choice Based Lettings Scheme which allows anyone seeking access to affordable homes to bid on properties of their choice. Specifically, those
Education	0	As point 1
Built Community	0	As point 1
Cultural Community	2	Choice based lettings systems allow applicants to chose where they wish to be considered for housing and therefore allowing them to chose the area that best
Accessibility	4	As point 6
Local Economy and Jobs	0	As point 1
Safety	2	As point 6
Democratic Voice	2	A full publica consultation will be carried out ahead of adopting the updated Policy
Equity	2	Positive impact on groups with protected characteristics.

NB: You can filter the justifications by colour using the filter option on the 'score' column.

For example, you can choose to only print red scores so that you can review them.



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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>KILKENNY CAR PARK</p>
<p>Wards affected</p>	<p>Brize Norton and Carterton</p>
<p>Accountable member</p>	<p>Lidia Arciszewska-Executive Member for Environment Email: Lidia.arcisewska@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Claire Locke – Executive Director Email: claire.locke@publicagroup.uk</p>
<p>Report author</p>	<p>Maria Wheatley-Parking Manger Email: maria.wheatley@publicagroup.uk</p>
<p>Summary/Purpose</p>	<p>To add Kilkenny Car Park to the West Oxfordshire District Council (Off-Street Parking Places) Order.</p>
<p>Annexes</p>	<p>Annex A – Map of the Kilkenny Car Park Annex B – Equality and Rural Impact Assessment Annex C- Sustainability Impact Assessment</p>
<p>Recommendation(s)</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> 1. Add the Kilkenny Car Park to the West Oxfordshire District Council (Off-Street Parking Places) Order ('the Parking Order') to enable the Council to regulate and manage the use. 2. Delegate authority to the Executive Director for Corporate Services in consultation with the Executive Member for Environment to consider consultation feedback received in respect of the proposed amendments to the Parking Order and decide whether to make the variation to the Parking Order in whole or in part or to abandon the proposal.
<p>Corporate priorities</p>	<ul style="list-style-type: none"> • Putting Residents First • A Good Quality of Life for All • A Better Environment for People and Wildlife

	<ul style="list-style-type: none"> • Working Together for West Oxfordshire
Key Decision	NO
Exempt	NO
Consultees/ Consultation	All changes to the West Oxfordshire District Council (Off-Street Parking Places) Order will require statutory and public consultation.

1. EXECUTIVE SUMMARY

- 1.1** West Oxfordshire District Council ('the Council') owns the Kilkenny Country Park including the public conveniences and car park shown marked red on the plan attached at Annex A.
- 1.2** During 2025 the car park was heavily used and there were some instances of camping, barbeques and littering, which was reported by residents as becoming a regular nuisance. The camping continued through the summer including campervans being seen overnight during the Christmas period.
- 1.3** The Council would like to regulate the car park to bring it in line with other public car parks to be patrolled and regulated under the parking order.
The local residents are concerned with the number of vehicles where people are sleeping overnight, and Brize Norton Parish Council are in support of taking measures to address this.
- 1.4** This will enable the Council to stipulate the terms of use, and issue penalty charge notices to those in breach of the Parking Order.

2. MAIN POINTS

- 2.1** To add the Kilkenny Car Park to the Parking Order to enable the Council to regulate and manage the use.
- 2.2** The proposal does not include the introduction of any parking charge.
- 2.3** The proposal is to have a 6-hour maximum stay in any 12-hour period, which will dissuade drivers from leaving cars in the car park for days at a time and consequently blocking bays.
- 2.4** Erect signs to clearly say no camping or sleeping is permitted in the car park.
- 2.5** Penalty charge notices will be issued for those vehicles contravening the terms and conditions of the car park.
- 2.6** This car park will be included in the patrol rota for the Enforcement Officers to cover, no additional resources are required.

3. ALTERNATIVE OPTIONS

- 3.1** The Council may choose not to include the car park in the Parking Order and continue to have little or no regulations at the site and rely on ownership rights.

4. CONCLUSIONS

- 4.1** Including this car park in the Parking Order will allow the Council to better control the car park.

5. FINANCIAL IMPLICATIONS

5.1 An initial spend of £750 is required for new signs, and the associated costs for the Parking Order to be advertised in the press. There are no other ongoing costs relating to enforcement as this can be absorbed into the patrol rota with the current staffing.

5.2 The one-off expenditure will be met from the existing revenue budget.

6. LEGAL IMPLICATIONS

6.1 The provision of off-street car parking is not the subject of a statutory duty.

6.2 A positive resolution would require a variation to the Parking Order to incorporate a new car park.

6.3 Variation of the Parking Order requires following a require process of consultation, notice and consideration as set out in legislation and regulations.

6.4 Failure to follow procedure, meet statutory deadlines or standards in some services may expose the Council to legal challenge and/or financial liability.

7. RISK ASSESSMENT

7.1 If the Council decides not to include this car park into the Parking Order it would leave the Council vulnerable to criticism for knowing there is a problem but choosing not to address it

8. EQUALITIES IMPACT

8.1 There are no unacceptable adverse effects on the protected characteristics covered by the Equality Act 2010. There are no changes proposed to the provision of disabled parking bays in the car park.

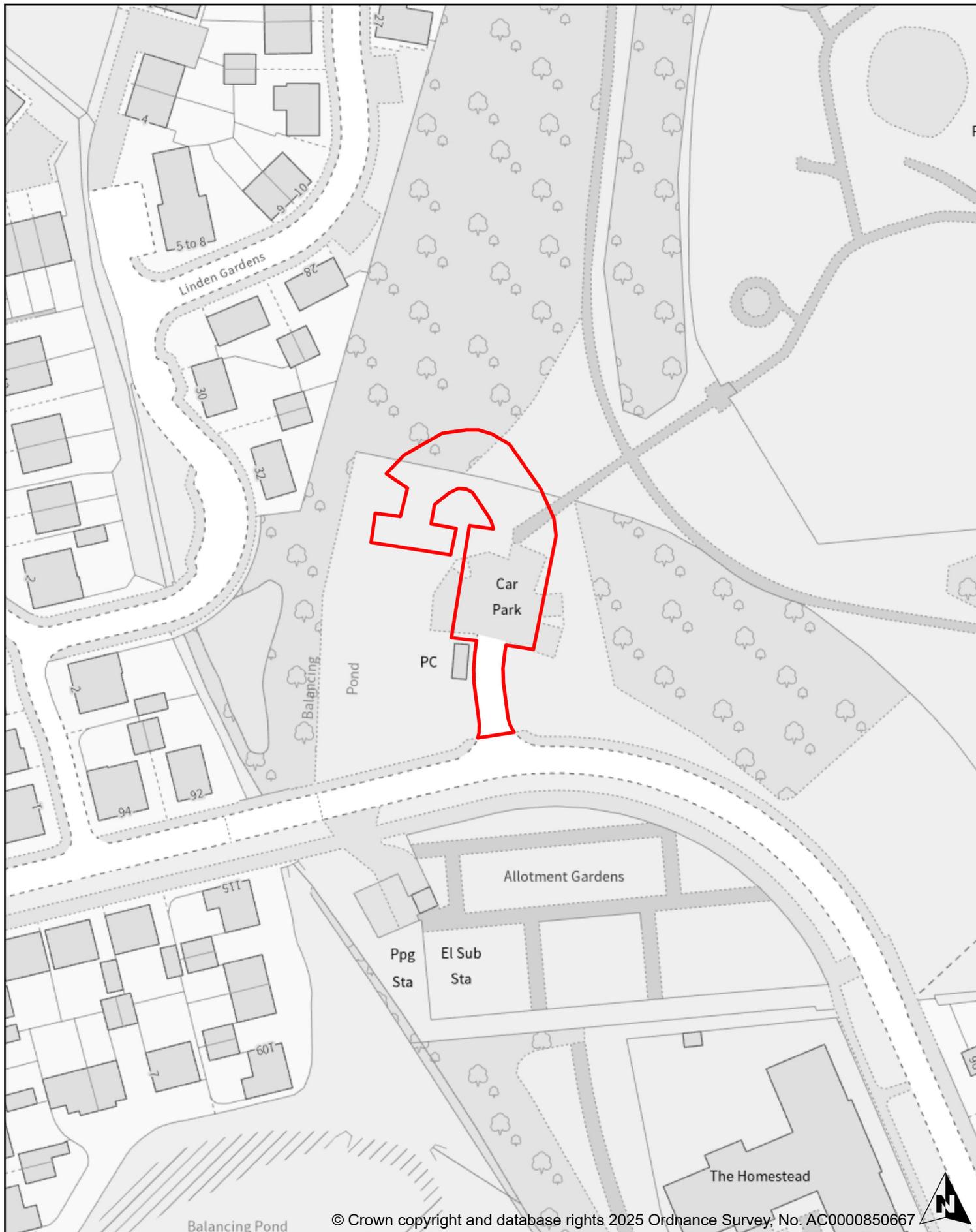
8.2 An Equalities Impact Assessment has been completed and is attached at Annex B.

9. SUSTAINABILITY IMPLICATIONS

9.1 The Sustainability Impact Assessment Tool (SIAT), a project evaluation tool, that aims to maximise climate, environmental and socio-economic benefits in project development and decision making has been completed. The output of the tool is a Sustainability Impact Assessment (SIA).

9.2 The Sustainability Impact Assessment is included in Annex C.

(END)



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Car Park:	Kilkenny, Elmhurst Way, Brize Norton
Plan Number:	
Department:	Car Parking
Date: 22.012.2025	Scale: 1:1000



WEST OXFORDSHIRE
DISTRICT COUNCIL

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Equality and Rurality Impact Assessment Form

When completing this form you will need to provide evidence that you have considered how the ‘protected characteristics’ may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet

Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Maria Wheatley	
Date of assessment: 22/12/2025	Telephone: 01285 623228 Email: maria.wheatley@publicagroup.uk

2. Name of the policy, service, strategy, procedure or function:

Addition of Kilkenny Car Park, Brize Norton into the West Oxfordshire Off-Street Parking Order Is this a new or existing one? New/Existing (please delete as appropriate)
--

3. Briefly describe it aims and objectives

Include the Kilkenny Car Park into the Parking Order to enable the council to regulate the use, and enforce the terms and conditions of the car park. This will protect the car park for users of the Country Park.

4. Are there any external considerations? (e.g. Legislation/government directives)

Any changes to the Parking Order will require statutory and public consultation

--

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	<input type="checkbox"/>	
Recent research findings including studies of deprivation	<input type="checkbox"/>	
Results of recent consultations and surveys	<input type="checkbox"/>	
Results of ethnic monitoring data and any equalities data	<input type="checkbox"/>	
Anecdotal information from groups and agencies within Gloucestershire	✓	
Comparisons between similar functions / policies elsewhere	✓	
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	<input type="checkbox"/>	

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6. Please specify how intend to gather evidence to fill any gaps identified above:

N/A

7. Has any consultation been carried out?

<p>Yes</p> <p>Details of Consultation Statutory and public consultation.</p>
--

If NO please outline any planned activities

--

8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	x
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
Comments: e.g. Who will this specifically impact? Any users of the car park will see new signage that will specify the terms of use.	

9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

Negative – it could disadvantage and therefore potentially not meet the General Equality duty;

Positive – it could benefit and help meet the General Equality duty;

Neutral – neither positive nor negative impact / Not sure

	Potential Negative	Potential Positive	Neutral	Reasons	Options for mitigating adverse impacts
Age – Young People			x		
Age – Old People			x		
Disability			x		
Sex – Male			x		
Sex – Female			x		
Race including Gypsy and Travellers			x		
Religion or Belief			x		

Sexual Orientation			x		
Gender Reassignment			x		
Pregnancy and maternity			x		
Geographical impacts on one area			x		
Other Groups			x		
Rural considerations: ie Access to services; leisure facilities, transport; education; employment; broadband.			x		

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10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale

11. Is there is anything else that you wish to add?

N/A

Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed By:	Maria Wheatley	Date:	22.12.25
Line Manager:	Susan Hughes	Date:	23.12.25
Reviewed by Corporate Equality Officer:	Chloe Phillips	Date:	05.01.2025

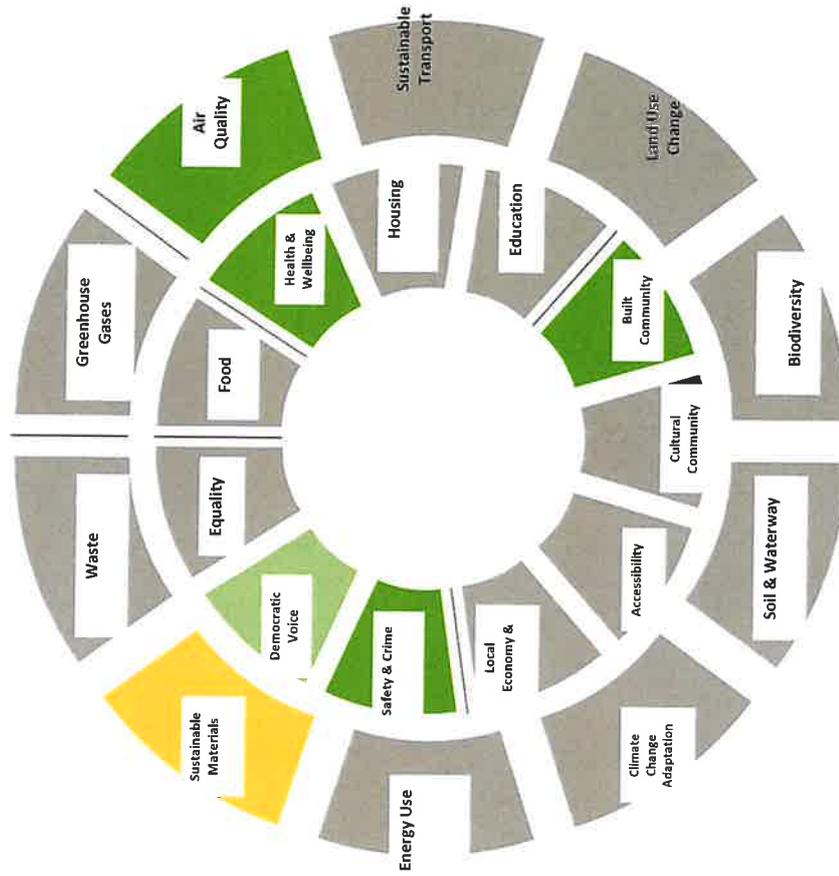
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Project Brief

To add the Kilkenny Car Park to the current parking order to enable the council to regulate and manage the use.

Criteria	Score	Justification
Energy Use	0	Net neutral
GHGs	0	The Enforcement Officers will travel further to patrol this car park however the car park service use all electric vehicles.
Air quality	4	By regulating the car park to ensure no overnight camping or open fires such as barbecues this will reduce and air pollutants associated with this activity.
Land use change	0	No change to the land use.
Soil and waterway health	0	No changes to the use of the land
Waste	0	No known waste for this project.
Sustainable Transport	0	No change of use of the car park other than the camping.
Biodiversity	0	No change to the use therefore no positive or negative affect on biodiversity.
Climate Change Adaptation	0	No change to the car park itself
Sustainable Materials	-1	The new sign may have some recyclable materials in it, however it is likely to be in place for several years. To have a sign that is reflective for headlights and resistant
Food	0	No known affect on food
Health	4	By regulating the use of the parking bays to prevent bay blocking, may improve the opportunity for more people to use the adjacent open park land for walking or other outdoor leisure activities
Housing	0	No known impact on housing.
Education	0	No known impact on education
Built Community	4	By regulating the availability of parking/access to the Country park will encourage use of the outdoor space.
Cultural Community	0	No known impact on Cultural community
Accessibility	0	The disabled bays in the car park remain unaffected.
Local Economy and Jobs	0	No impact on local economy or jobs
Safety	4	The regular patrol of the car park will positively influence behaviours at this location.
Democratic Voice	2	Any change to the parking order requires statutory and public consultation
Equity	0	No impacts on groups with protected characteristics.

NB: You can filter the justifications by colour using the filter option on the 'score' column. For example, you can choose to only print red scores so that you can review them.



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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>CORPORATE ENFORCEMENT POLICY</p>
<p>Wards affected</p>	<p>All</p>
<p>Accountable member</p>	<p>Councillor Andy Graham, Leader of the Council Email: Andy.Graham@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Andrea McCaskie, Director of Governance and Regulatory Services Email: andrea.mccaskie@westoxon.gov.uk</p>
<p>Report author</p>	<p>Emma Cathcart, Assistant Director Counter Fraud and Enforcement Unit Email: emma.cathcart@cotswold.gov.uk</p>
<p>Summary/Purpose</p>	<p>To present Executive with a revised Corporate Enforcement Policy ('The Policy') for approval and adoption.</p> <p>West Oxfordshire District Council ('the Council') is required to have an effective Corporate Enforcement Policy to enable Officers to investigate and take action to ensure individuals and businesses comply with the law.</p> <p>The Policy sets out the legislative framework and principles the Council will abide by when undertaking investigations to mitigate the risk of legal challenge in Court.</p> <p>The Policy demonstrates the Council's consideration of necessity, proportionality and public interest when deciding on enforcement action and demonstrates openness and transparency for residents, Councillors and employees.</p>
<p>Annexes</p>	<p>Annex A – Corporate Enforcement Policy Annex B – Equality and Rurality Impact Assessment</p>
<p>Recommendation(s)</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> I. Approve and adopt the Corporate Enforcement Policy attached to this report as Annex A.

	2. Delegate authority to the Director of Governance and Regulatory Services to approve future minor amendments to the Policy, in consultation with the Leader of the Council, Head of Service Counter Fraud and Enforcement Unit, Relevant Heads of Service and the Head of Legal Services.
Corporate priorities	Working Together for West Oxfordshire
Key Decision	NO
Exempt	NO
Consultees/ Consultation	The draft Policy was subject to consultation with Enforcement Officers, Management Team and Legal Services.

1. EXECUTIVE SUMMARY

- 1.1 The Counter Fraud and Enforcement Unit is tasked with reviewing the Council's Corporate Enforcement Policy.
- 1.2 Regulatory authorities produce enforcement policies to inform the public and businesses about the principles which underpin their approach to enforcement.
- 1.3 The Council is responsible for investigating and enforcing a wide range of breaches and offences. This Policy is required to ensure consistency in the approach the Council takes when considering the enforcement options available, as it provides an overarching framework.
- 1.4 A consistent and fair standard will help to ensure the Council is less likely to be challenged during legal proceedings and aids Officers when taking enforcement decisions.
- 1.5 Some service areas may produce separate operational enforcement plans and policies setting out more detailed relevant service-specific procedures.

2. BACKGROUND

- 2.1 The Policy attached at Annex A sets out the enforcement principles that the Council will apply to its enforcement activities and the guiding principles by which the Council will seek to protect public health, safety, amenity and environment within its locality.
- 2.2 The Policy details the various areas of enforcement the Council is responsible for. It has been reviewed by lead officers who have enforcement responsibilities to ensure it correctly reflects key legislation.
- 2.3 The Policy acts as an overarching one for the Council, with individual service areas adhering to more detailed enforcement policies and procedures relating to their specific areas of enforcement and legislation.
- 2.4 For ease of reference, new text is shown in red and text to be removed is shown as struck through.
- 2.5 The majority of the amendments in sections 1 to 15 reflect minor amendments with more significant additions and updates being made to Section 16 of the Policy 'The scope of each service'.
- 2.6 Section 16 of the Policy now reflects a new section being drafted to better cover the Licensing Service and the Council's activities in relation to anti-social behaviour.
- 2.7 Cabinet (now Executive Committee) considered the Policy in April 2019.
- 2.8 Awareness will be raised with all employees following the approval of the Policy through internal communication channels and through all employee briefings and management meetings.

3. ALTERNATIVE OPTIONS

- 3.1 None.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no direct financial implications arising from this report.
- 4.2 The adoption and approval of this Policy will support the Council's objectives in reducing crime and financial loss to the council.
- 4.3 The Policy provides Officers with a framework that can be followed when dealing with enforcement. This allows for financial penalties to be charged however the intention of the Policy is not for revenue raising purposes but to ensure the correct application of sanctions and penalties.

5. LEGAL IMPLICATIONS

- 5.1 There are no significant legal implications associated with this report.
- 5.2 The Council has a statutory obligation for enforcing a wide range of legislation, where it is necessary and proportionate to do so, and this is identified within the policy.
- 5.3 In general terms, the existence and application of an effective enforcement regime assists the council in effective deterrent and detection activities which is less susceptible to legal challenge.
- 5.4 The legislation utilised by the Council is identified within the Policy and the Council must comply with all legislative requirements.

6. RISK ASSESSMENT

- 6.1 The Council is required to have an effective Corporate Enforcement Policy to enable Officers to investigate and take action to ensure individuals and businesses comply with the law.
- 6.2 The Policy sets out the legislative framework and principles the Council will abide by in investigations undertaken and to mitigate the risk of legal challenge in Court.

7. EQUALITIES IMPACT

- 7.1 Prosecutions will only be considered where the evidential and public interest tests are met with due consideration to the welfare of individuals. Where any safeguarding concerns are identified during the course of any investigation, appropriate referrals will be made.
- 7.2 The Council will only take enforcement action where appropriate to do so with due consideration to older offenders, offenders with disabilities and where the offender lacks mental capacity.
- 7.3 The Council seeks to ensure that public authorities' actions are consistent with the Human Rights Act 1998. It balances safeguarding the rights of the individual against the needs of society as a whole to be protected from crime and other public safety risks.
- 7.4 An Equality and Rurality Assessment is attached at Annex B detailing considerations.

8. SUSTAINABILITY IMPLICATIONS

8.1 None directly.

9. **BACKGROUND PAPERS**

None. (END)

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Corporate Enforcement Policy

Version Control:

Document Name: Corporate Enforcement Policy

Version: 2

Responsible Officer: Chief Executive
Head of Service Counter Fraud and Enforcement Unit

Approved by: Cabinet

Next Review Date November 2028

Revision History

Revision date	Version	Description
April 2019	1	Redraft of Enforcement Policy; Cabinet February 2013
<u>October 2025</u>	<u>2</u>	<u>Full review with inclusion of Anti-Social Behaviour section, Licensing section and general revisions</u>

Consultees

Internal	External
Enforcement Service Leads Legal Services Corporate Management / Senior Leadership Team Cabinet <u>Executive</u> Member - Leader of the Council	

Distribution

Name	
Enforcement Officers	

Corporate Enforcement Policy

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Corporate Enforcement Policy

1. INTRODUCTION

- 1.1 West Oxfordshire District Council ('the Council') is responsible for enforcing a wide range of legislation. This document sets out the Council's Corporate Enforcement Policy ('the Policy'). It is clear that, due to the range of enforcement issues dealt with by the Council, there is no one approach, which fits all and therefore where dealing with particular issues, the ePolicy has been separated into service areas. The additional details can be found annexed to this Policy.
- 1.2 This Council takes breaches of legislation seriously and always carries out investigations where necessary. Enforcement includes any action taken by Officers aimed at ensuring that individuals or businesses comply with the law. The enforcement options will differ where different pieces of legislation are used, but the principles of application should remain constant.
- 1.3 Any reference within this Policy to staff, employees or Officers includes individuals employed to carry out duties on behalf of the Council. These Officers may be contractors, employees of Publica or have joint employment arrangements with the Council.
- 1.4 Enforcement includes visits, verbal and written advice on legal requirements and good practice, assistance with licensing compliance, written warnings, the service of statutory and fixed penalty notices, **criminal and civil** including financial penalties, prohibitions, **simple formal** cautions, attachment to earnings (including some benefits and allowances), prosecution, seizure and detention, works in default, injunctions and liaison and cooperation with other enforcement authorities where appropriate.

2. PURPOSE OF THE POLICY

- 2.1 The purpose of this Policy is to set out the guiding principles by which legislation will be enforced by the Council to protect public health, safety, amenity and the environment within the Council's jurisdiction.
- 2.2 It provides an enforcement framework in accordance with:
- The Central and Local Government Concordat on Good Enforcement.
 - The Legislative and Regulatory Reform Act 2006.
 - The Regulators Compliance Code.
 - The Crime and Disorder Act 1998.
 - The Regulatory Enforcement and Sanctions Act 2008.
- ~~2.3~~ **Additionally, e**Enforcement plays an important role in enabling the Council to achieve its priorities and community outcomes. ~~which are:~~
- ~~• To create strong communities and reduce crime and disorder;~~
 - ~~• To enhance the environment;~~
 - ~~• To promote a thriving economy and seek to maintain a fair trading environment;~~
 - ~~• To protect the social housing stock;~~
 - ~~• To deliver value for money;~~
 - ~~• To carry out enforcement in a fair, practical and consistent manner.~~

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3 PRINCIPLES AND PROCEDURES FOR GOOD ENFORCEMENT

3.1 The Council has adopted the Central and Local Government Concordat on Good Enforcement ([‘the Concordat’](#)). The Legislative and Regulatory Reform Act 2006 also places a duty on the Council to have regard to the ‘Principles of Good Regulation’ when exercising specified regulatory functions.

3.2 The ‘Principles of Good Regulation’, together with the principles set out in the Concordat, are intended to ensure:

- **Standards:** Provide and publish clear standards setting out the level of service and performance provided by the Council.
- **Openness:** Provision of information and advice in plain language about how we carry out our work, including consultation with stakeholders.
- **Helpfulness:** Provision of advice and assistance on compliance in a courteous efficient and prompt manner.
- **Proportionality:** When making a decision on appropriate enforcement action, Officers will, where discretion is allowed, consider both the circumstances of the case and history of the parties involved and will ensure that the remedial action required is proportionate to the risks and/or disadvantage created by the non-compliance, that it reflects any advice issued by Central Government or other co-ordinating bodies and takes into consideration relevant advice, **Ppolicy** and the aims of the Council.
- **Consistency:** Duties to be carried out in a fair, equitable and consistent manner and with arrangements in place to promote consistency.
- **Transparency:** Access to information regarding regulatory procedures and decisions to be freely available.
- **Accountability:** The Council will be accountable for the efficiency and effectiveness of its regulatory activities.
- **Targeting:** The Council accepts that its enforcement resources are limited and, where appropriate, they should be focused on those persons or companies whose activities give rise to the risks which are most serious or least well controlled on their own premises or public open space. Enforcement is informed through intelligence arising from an investigation or complaints, planned projects, special surveys, enforcement initiatives or as a requirement from a Government Department.
- **Confidentiality:** The Council will ensure information provided in confidence is treated accordingly.

4 THE REGULATORS’ COMPLIANCE CODE

4.1 The Council will have regard to the Regulators’ Compliance Code with a view to achieving regulatory outcomes without imposing unnecessary burdens on businesses, organisations and other regulated entities by:

- **Supporting economic progress:** To allow and encourage economic progress and choose proportionate approaches to those they regulate based on relevant factors including, for example, business size and capacity.
- **Risk assessment:** To determine the priority risk in the area of responsibility and then allocate resources where they would be most effective in addressing those priority risks.
- **Advice and guidance:** To provide authoritative and accessible advice to businesses.

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- **Simple and straightforward ways to engage:** To explain clearly what the non-compliant item or activity is, the advice being given, actions required or decisions taken and the reasons for these.
- **Transparency:** By publishing a clear set of service standards and setting out what those they regulate should expect from them.

5 CONFLICTS OF INTEREST AND UNDUE INFLUENCE

- 5.1 The enforcement role of the Council is an impartial one. However, as with any organisation, there is the possibility of a real or perceived conflict of interest or undue influence arising. It is therefore important to the integrity of the enforcement services of the Council that people seeking to use it are not the subject of discrimination, nor are they granted advantageous treatment because of their status.
- 5.2 Conflict of interest could include where a customer is socially acquainted with or related to the Enforcement Officer. Under these circumstances it may be difficult for the Officer to act in an impartial manner.
- 5.3 Undue influence arises where a party exercises a dominant influence over the mind of another so that person is unable to exercise a free and independent will in the matter. For example, when an employee knows that a client is a Councillor or a more senior member of staff.
- 5.4 Where an employee believes that there is potential for conflict of interest or undue influence then the matter should be referred to their Line Manager for appropriate action and advice.

6 FAIRNESS AND EQUALITY

- 6.1 All enforcement action and investigations will be carried out in a manner which complies with the requirements of legislation and codes of practice governing the collection of evidence and investigatory powers.
- 6.2 Officers will take care not to take any action which contravenes human rights and anti-discrimination legislation unless it is necessary and proportionate to do so.

7 REFERRALS

- 7.1 The Council regularly consults (and works) with other agencies including:
- Fire and Rescue Services;
 - **Utility Companies** ~~Severn Welsh Water/Trent Water/Thames Water;~~
 - The Police;
 - The Environment Agency;
 - The Department for Environment, Food and Rural Affairs;
 - The Drinking Water Inspectorate;
 - The Department for Work and Pensions;
 - Health and Safety Executive;
 - **The Forestry Commission**
 - **The Ministry of Housing, Communities and Local Government**
 - **Historic England**

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- **Oxfordshire** The County Council;
- Other Councils;
- Other agencies or organisations as appropriate;

7.2 Information of allegations outside the remit of this Council may be referred to the appropriate enforcement authority to enable that agency to investigate the allegation.

7.3 The Council may also provide data to or obtain data from other enforcing authorities. When data sharing between authorities/agencies occurs this will be done in accordance with all data protection legislation and regulations.

7.4 The information supplied by an individual may be used to commence or support an investigation. However, the Council will ensure that the identity of persons contacting the Council is not revealed to a third party except:

- Where the law requires.
- Where the case proceeds to Court or Tribunal.
- With the prior written agreement of the person supplying the information.

8 ENFORCEMENT ACTION, TOOLS AND REMEDIES

8.1 All enforcement action, whether formal or informal, will be carried out in accordance with the principles set out in this Policy.

8.2 In deciding to take formal action and, if so, what type of action to take, Officers will consider the following:

- Any individual Enforcement Policy relevant to their practice area;
- The seriousness of the breach or contravention;
- The consequences of non-compliance in terms of risk to people, property, the community or the environment;
- The individual's or company's past history in terms of compliance;
- Confidence in management, level of awareness of statutory responsibilities and willingness to prevent a recurrence;
- The likely effectiveness of the various alternative enforcement options;
- The public interest, protecting public health, public expectation and the importance of the case in setting a precedent;
- The application of any national or local guidance to the matter in question;
- The aims and priorities of the Council;
- Information received following liaison with other external enforcing agencies;
- Relevant case law and guidance;
- **Legislation**
- The likelihood of the contravener being able to establish a defence;
- The information received following liaison with other authorities;
- The reliability of witnesses.

8.3 The most efficient, **proportionate** and effective action will be taken to achieve the desired compliance with the law. The decision will be taken in an objective and fair way in accordance with the principles set out in this Policy.

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- 8.4 In the vast majority of cases the Council will try to resolve matters without resorting to enforcement action. Where possible and appropriate, the Council will work informally through negotiation and discussion to remedy the situation. ~~In the vast majority of cases the Council will try to resolve matters informally through negotiation and discussion.~~ . In some cases informal resolution cannot be achieved, or the matter being enforced is so serious that the informal stage would be inadequate. In these cases the Council has a wide range of alternative powers available. Certain breaches of legislation will require urgent and immediate attention, either because the time period for action is limited or because the effect of the activity causes significant harm to the public interest.
- 8.5 The Council has the power to issue a Requisition for Information under various pieces of legislation, such as section 16 of the Local Government (Miscellaneous Provisions) Act 1976, section 330 of the Town and Country Planning Act 1990, [section 235 of the Housing Act 2004](#) and section 85 of the Private Water Supply Regulations 2016. This notice requires the recipient to provide information in respect of land/property in which they are suspected to have an interest. Not returning the form duly completed is an offence which can be prosecuted in the Magistrates' Court and lead to a fine of up to £5,000. For suspected breaches of planning control the Council also has the power to issue a Planning Contravention Notice under section 171C of the Town and Country Planning Act 1990, which carries a similar penalty for failing to comply.
- 8.6 The Council can use civil remedies to recover any property or debts and any costs incurred, but the Council also has the power to prosecute a wide range of offences under section 222 of the Local Government Act 1972. Where there is enforcement action in a criminal court the Council can use Proceeds of Crime Act 2002 legislation to recover money.
- 8.7 There are three areas under the Regulation of Investigatory Powers Act 2000 (RIPA) and the Investigatory Powers Act 2016 that have to be considered by a Local Authority when conducting investigations. These are:
- Directed Surveillance.
 - Covert Human Intelligence Sources (CHIS).
 - Acquisition of Communications Data.
- 8.8 The Council has separate ~~P~~olicies and ~~P~~rocedural ~~G~~uides relating to the use of RIPA and any Officer considering the use of it must ~~sho~~uld follow these.
- 8.9 Where the Council uses CCTV it does so in line with the appropriate regulatory guidance and legislation. The Council has a separate ~~P~~olicy which Officers must adhere to.

9 ENFORCEMENT OPTIONS

- 9.1 The options available (but not limited to) are:
- Informal action and advice – written or oral,
 - A range of Statutory Notices generally requiring some remedy within a specified timescale (or possibly immediately),
 - Fixed Penalty and Civil Penalty Notices,
 - Letter of warning,
 - Simple Caution,
 - Financial Penalty,
 - Prosecution,
 - Prohibition,

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- Injunctive Restraint,
- Seizure of goods, equipment, articles or records (paper or computer),
- Execution of work in default i.e. works required by a Statutory Notice where the recipient has not complied,
- A range of Statutory Orders,
- Compulsory purchase and enforced sale of properties or land,
- Attachment to earnings,
- County Court Enforcement,
- Bankruptcy and Winding-Up Petitions.
- Proceeds of Crime Applications

10 PROSECUTION

10.1 The Council will use discretion in deciding whether to initiate a prosecution. Other approaches to enforcement can sometimes promote compliance with legislation more effectively. However, where the circumstances warrant it, prosecution without prior warning and recourse to alternative sanctions may be appropriate.

10.2 Each case will be treated as unique and considered on its own facts and merits with due consideration to the Equality Act 2010 and the Human Rights Act 1998. All the circumstances surrounding the case will be considered including the social benefits and costs associated with bringing the matter to the attention of the Courts.

10.3 The prosecution of offenders will be used judiciously but, without hesitation, against those businesses or individuals where the law is broken and the health, safety, well-being or amenity of the public, employees and consumers are subject to serious risk.

10.4 Legal advice will be taken to ensure that only those cases presenting a realistic prospect of conviction will be pursued. The Council will have due regard to the availability of any defences and to any explanation, apology or other issue referred to by the suspect by way of mitigation.

10.5 The decision to prosecute **must be taken by Officers with the correct delegated authority, independently of Councillors, subject to financial implications which may require a formal Council decision. The decision** will take into account the criteria set down in the Code for Crown Prosecutors, issued by the Crown Prosecution Service. Both stages of the 'Full Code Test' as set out in the Code for Crown prosecutors will be applied as set out below:

10.5.1 **The Evidential Test**

10.5.1.1 There must be sufficient evidence to provide a realistic prospect of conviction and the evidence must be admissible and reliable.

10.5.1.2 In determining the sufficiency of evidence, consideration **will** ~~should~~ be given to the following factors:

- i) Availability of essential evidence;
- ii) Credibility of witnesses – are they likely to be seen as credible witnesses and whether they are likely to be consistent and fail under cross-examination? – are they willing to attend as witnesses? – could they be 'hostile' witnesses?
- iii) Where the case depends in part on admissions or confessions, regard should be had to their admissibility;

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- iv) Where two or more defendants are summonsed together, the sufficiency and admissibility of evidence available against each defendant, in the event that separate trials are ordered.

10.5.1.3 In determining the admissibility of evidence, regard **will** ~~should~~ be given to the requirements of the Police and Criminal Evidence Act 1984 and the Criminal Procedure and Investigations Act 1996 and associated Codes of Practice.

10.5.2 The Public Interest Test

10.5.2.1 When satisfied that sufficient evidence is available, consideration must be given to whether the public interest requires a prosecution.

10.5.2.2 The following considerations ~~should~~ **will** apply:

- i) Seriousness of the offence – the degree of detriment or potential detriment to consumers, employees or the environment. Current public attitudes to the particular breach of law should be considered.
- ii) The age of the offence – less regard will be paid to this if the length of time could be attributable to the defendant themselves, the complexity of the case or the particular characteristics of the offence that have contributed to the delay in its coming to light.
- iii) The age, circumstances or mental state of the offender – less regard to this is given if there is a real possibility of repetition or the offence is of a serious nature. Whether the defendant is likely to be fit enough to attend Court should also be considered.
- iv) The willingness of the offender to prevent a recurrence of the problem. If the circumstances that give rise to the offence have subsequently been rectified and there is little likelihood of a recurrence then the case may be dealt with more appropriately by other means.
- v) The ‘newness’ of the legislation transgressed may be a consideration, especially where the offence is of a technical nature, and future compliance may be obtained by less formal means.
- vi) Important but uncertain legal points that may have to be tested by way of prosecution.

11 SIMPLE CAUTIONS

11.1 A **Local Authority** Simple Caution may be used as an alternative to prosecution. The aim of a Simple Caution is to deal quickly and simply with offences, save Court time and reduce the likelihood of re-offending.

11.2 A decision to offer a Simple Caution must be made having regard to:

- Home Office circular **16/2008 Simple Cautioning of Adult Offenders** ~~30/2005 Cautioning of Offenders~~.
- Guidance to Police Officers and Crown Prosecutors issued by the Director of Public Prosecutions.
- **Local Authorities Coordinators Of Regulatory Services** Guidance on Cautioning of Offenders.

11.3 Following the offer of a Simple Caution, the individual or company concerned will be required to confirm acceptance within 14 days.

11.4 When considering whether to offer a Simple Caution, the following will be taken into account:

- Whether a Simple Caution is appropriate to the offence and the offender;

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- Whether a Simple Caution is likely to be effective;
- Public interest considerations;
- The views of the victim and the nature of any harm or loss;
- Whether the offender has made any form of reparation or paid any compensation;
- Any known records of previous convictions or Simple Cautions relating to the offender.

11.5 A Simple Caution **will usually only be considered for low level offending and** cannot be given where the offence is indictable only or where the offender is under 18 years of age. It may only be offered where the offence has been fully admitted by the offender.

11.6 The person administering the Caution will be an appropriate Senior Officer employed within the Council.

11.7 If the offender fails to admit the offence or does not agree to the Simple Caution, the case will be considered for prosecution.

12 POWERS OF OFFICERS

12.1 Officers have a range of delegated powers set out within legislation to assist them in undertaking their duties. These can include the power to require answers to questions and the power to enter premises.

12.2 Officers have powers delegated to them, under the relevant schemes of delegation, to undertake duties relating to the Council.

12.3 Officers will carry an identity badge and their authorisation card (warrant) with them at all times, where they hold one. Where Officers do not have an authorisation card, delegation documentation can be supplied. In the event of any doubt with regard to an Officers' powers, confirmation can be obtained by contacting the Officer's Line Manager who can provide **evidence of any legislative authority for the exercise of their powers, or** any statutory provision describing their powers. It is an offence to obstruct an Authorised Officer who is conducting an inspection or investigation which could lead to prosecution.

13 CIVIL CLAIMS

13.1 Officers will not become involved in any negotiations on awarding reparation or compensation to victims following offences being committed.

13.2 Any enforcement action taken by the Council is separate and distinct from any civil claims **that may likely** to be made by individuals. Enforcement action is not necessarily undertaken in all circumstances where civil claims may be pursued, nor is it undertaken to assist such claims.

13.3 The Council may, on request, provide **to** solicitors acting for individuals pursuing a civil claim, a factual report of the investigation. There may be a charge for this report.

14 COMPLAINTS PROCEDURE

14.1 The Council aim to provide an efficient and fair enforcement service. In the first instance, most problems can be resolved with the Officer dealing with the matter or with their Line Manager.

14.2 In the event that a person or business is not satisfied with the response received informally, the Council has a formal complaints procedure which should be followed.

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- 14.3 The Council aims to acknowledge all formal complaints immediately and to provide an initial response within an allotted time as set out in the Complaints Procedure.
- 14.4 Please note that a complaint regarding a decision to prosecute cannot be progressed through the formal complaints procedure as this is a matter for **and can only be challenged in the Court**.
- 14.5 If a person is still dissatisfied having exhausted the Council's complaints procedure, a complaint can be made to the Local Government and Social Care Ombudsman.

15 IMPLEMENTATION AND REVIEW

- 15.1 Implementation of the **pPolicy** is the responsibility of all Enforcement Officers.
- 15.2 Departures from this **pPolicy** will not occur without full consideration of all the circumstances and in consultation with the Council's Legal Service save in exceptional or unforeseeable circumstances.
- 15.3 This **pPolicy** will be reviewed and updated if any changes in legislation, guidance or other circumstances have a significant impact on the enforcement principles set out in this Policy.

16 THE SCOPE OF EACH SERVICE

16.1 Planning - Development **Management Control**

- 16.1.1 The Planning Enforcement Team is empowered to investigate **allegations of breaches of planning and advertisement control and of the law relating to Listed Buildings. It also investigates alleged illegal works to trees and complaints of untidy land and buildings where neighbouring amenity is affected.** conditions. The team's role is to resolve such breaches by informal methods wherever possible and expedient, but, if necessary, **to do so** through **statutory** legal notices and court proceedings. Officers cannot intervene in non-planning **civil** matters such as boundary **or party wall** disputes **access over** and blocking off-rights of way, **or breaches of covenant**; nor in matters controlled by other legislation such as building regulations or public nuisance.
- 16.2 In the case of planning offences and those relating to trees, adverts and listed buildings, the level of planning (including amenity) and heritage harm will be one of the main considerations in deciding whether to prosecute.
- 16.2.1 Generally, eEnforcement action can only be pursued where works have taken place without the benefit of planning **or another relevant** permissions, **such as Listed Building Consent**, or where a development with the benefit of **a relevant** planning permission has not been undertaken in accordance with the approved plans/details or a condition attached to it.
- 16.2.2 Some developments, including domestic extensions, even if it has a harmful impact on neighbours, may not be susceptible for planning enforcement action. This may be due to **elapse of time or because planning permission is deemed to have been granted under permitted development rights (as set out in the Town and Country Planning (General Permitted Development) (England) Order 2015)**. If the works fall within permitted development rights there will not be a breach of planning control. Planning and Listed Building Enforcement Notices cannot be issued in respect of anticipated breaches; however **where there is strong evidence of imminent, unlawful and serious harm, the use of injunctive action may be considered where there is strong evidence that a breach will occur, such action is considered to be proportionate and it is considered that unauthorised development would cause irreparable damage to protect assets or serious harm to the public. Usually, action in respect of a breach of planning control will only be taken when unauthorised development has commenced.**

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- ~~16.2.3 Domestic extensions, regardless of impact on neighbours, may be immune from planning enforcement action if the works fall within permitted development rights. Any work commenced within the standard three year life of the permission, and built as approved are beyond further control. No action is possible in respect of anticipated breaches. Action can only be taken once an unauthorised development has commenced.~~
- 16.2.4 In addition to building works, planning enforcement **applies to unauthorised material changes of use. Certain types of unauthorised** ~~can also apply to~~ demolition in certain circumstances, ~~material changes of use,~~ **certain** alterations to listed buildings, advertisement signs and hoardings, and **certain unauthorised works** to trees subject to Tree Preservation Orders or in a Conservation Area. Although ~~technically~~ not breaches of planning control, remedial action may also be taken against untidy land and buildings **through service of a Notice through the Town and Country Planning Act 1990 (s215 Notice) which requires owners/occupiers to take action in cases where the condition of the land adversely affects the amenity of the area.**
- 16.2.5 Complainants should note that, whilst the Council, as the Local Planning Authority (LPA), does have a **general** duty to investigate allegations of planning breaches, enforcement powers are discretionary. **In some cases** ~~and~~ it is therefore foreseeable that some complainants will be disappointed with the outcomes where it is not considered expedient to take **formal** action. The planning system is **not** designed to **be punitive, rather it is intended to** achieve a balance between competing demands in the public interest. ~~and~~ **eEnforcement** of planning control reflects this by focusing on proportionate resolution rather than **on seeking to** punishing those who have undertaken unauthorised work.
- 16.2.6 There are many different types of action available to the Planning Service when dealing with breaches of planning control. These may include:
- Informal Remedy **for example requiring amendments to unlawful works.**
 - Invite and application/ **seek to** regularise ~~actionation.~~
 - **Enforcement Warning Notice**
 - Service of Statutory Notices, **these include such as an** Enforcement Notice, Breach of Condition Notice or Stop Notice, **Temporary Stop Notice (and in the case of Listed Buildings, Listed Building Temporary Stop Notice).**
 - **Enforcement Warning Notices**
 - Simple Caution.
 - Injunction.
 - Prosecution.
 - No further action.
- ~~16.2.7 The Council's Planning Enforcement Plan and more details on the tools and powers available to the Planning Service can be found at **Annex 1.**~~
- ~~16.2.8~~ Priority Cases - **these are instances of alleged breaches which must be actioned urgently. These usually include the following** ~~Urgent and Immediate~~
- Complaints of serious irreparable harm to Listed Buildings or scheduled ~~ancient~~ monuments,
 - Demolition works in a Conservation Area,
 - Works to trees in Conservation Areas,
 - Removal of **protected** ~~ancient~~ hedgerows,
 - **Unauthorised development likely to cause serious** adverse impacts on wildlife habitats,

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- Works to trees with Preservation Orders,
- **Cases of harmful unauthorised development** where the time-limit for enforcement action will expire imminently,
- **Unauthorised** ~~Complaints of~~ development taking place which **is** causing serious harm to amenity or **public** safety,
- Non-compliance with effective notices,
- ~~Complaints where an urgent response is likely to prevent serious harm to amenity or shorten the time taken to resolve the issue.~~
- Cases of transient unauthorised occupation of Council land **within** ~~in accordance with~~ s77 and s78 Criminal Justice and Public Order Act 1994 or **to which section** 187b Town and Country Planning Act 1990 **applies**.
- Concerns (~~backed~~ **supported** ~~up by~~ strong evidence) **about the imminent occurrence of that a breach of control that is likely to cause significant harm and may occur in the future and a proactive response is required to prevent this happening,**
- ~~Creation or erection of new dwellings or buildings.~~
- The Council has signed up to the Oxfordshire Policy on Unauthorised Encampments. The Council liaises with the Oxfordshire Gypsy and Traveller Services Group and will take appropriate action in partnership with the Police and other agencies as directed.
- **The Council has signed up to the Memorandum of Understanding on the Prevention, Investigation, Enforcement and Prosecution of Heritage and Cultural Crime and Anti-Social Behaviour with Historic England.**

16.2.9 Other Cases

- ~~A risk based approach will be adopted in relation to scale, impact, number of people affected, harm caused and effect on LPA's reputation. It should be noted that, where an investigation reveals additional breaches of planning control, the status of the complaint may be varied.~~

A risk-based approach will be taken which considers in relation to the particular circumstances of the case with regard to:

- scale, impact and level of harm and its impact;
- number of people affected;
- harm caused, the degree to which the harm can be mitigated or remediated;
- the public interest and confidence in the Council and in the planning system.
- effect on the Council's reputation. It should be noted that, where an investigation reveals additional breaches of planning control, the status of the complaint may be varied.

•

16.3 Building Control

16.3.1 The Council has a statutory obligation to enforce Building Regulations and to be responsible for the building control function within its boundaries. The purpose of building regulations is to safeguard the health and safety of people in or around buildings. They also deal with energy conservation and with access and facilities for people in and around buildings.

16.3.2 Enforcement will be carried out in accordance with the Code of Conduct for Registered Building Inspectors, The Regulators Code and the Local Authority Building Control Enforcement Policy which can be found in the Quality Management System.

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16.3.3 The Building Control Services within the Council enforcement role encompasses the following:

- Enforcing Building Regulations through a process of plan checking and site inspection. **Any deviations from any approved planning permission (if one were required for the works) will be reported to the Planning Enforcement Team for separate investigation.**
- Ensuring that those responsible for the condition of buildings/structures maintain them in a safe condition.
- Ensuring that those responsible for the demolition of buildings observe conditions relating to health and safety.
- Responding to complaints.
- ~~Providing advice.~~
- Arranging for works in default to be carried out where necessary.
- Initiating legal intervention, where necessary.

16.3.4 In the majority of cases the **Registered Building Inspector** ~~inspecting Building Control Surveyor~~ will try and solve any problem informally with the customer or their representative e.g. builder or architect. This will usually involve having any incorrect work already done altered (**subject to discussions with the Planning Department**) or, if the Council has not been given the requisite notice to carry out an inspection, the work will need to be opened for inspection.

16.3.5 If these informal methods are unsuccessful, the **Registered Building Inspector** ~~inspecting Building Control Surveyor~~ may issue an Informal Notice detailing the offending items and giving a time period for compliance. If the Informal Notice is not complied with the **Registered Building Inspector** ~~Building Control Surveyor~~ may issue a Statutory Notice **in accordance with current legislation and the Quality Management Enforcement Policy.** Failure to comply with this could result in a prosecution.

16.3.6 The **Registered Building Inspector** ~~Building Control Surveyor~~ may also issue Statutory Notices for dangerous structures. These are given priority, followed by breaches of building regulations where the impact on the area or risk to the public is greatest.

16.4 Housing

16.4.1 ~~West Oxfordshire District~~**The Council** – transferred its housing stock to Cottsway Housing Association Limited.

16.4.2 The Council has a statutory duty with regard to provision of accommodation for homeless people that falls within categories prescribed by legislation. The investigation of applications made through the Council's Housing Options Team may also be subject to enforcement action. This could include civil remedies to recover property, but also criminal action such as a Simple Caution or prosecution.

16.4.3 Whilst the Council no longer owns any social housing properties, as a prosecuting body it can act on behalf of Registered Social Landlords to take action and obtain information, under the Prevention of Social Housing Fraud Act 2013.

16.5 ~~Environmental and Regulatory~~ **Health Services - (ERS) Environmental Protection and Food Health Safety**

16.5.1 The aim of the Council's Environmental Health service is to maintain and improve the health of local communities through the provision of cost effective advisory, investigation, inspection, monitoring or enforcement services for a range of issues. This will involve enforcing legal requirements in areas including:

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- Environmental protection, including noise, nuisance and anti-social behaviour, air quality, contaminated land and private water supplies
- Private Sector Housing; the team works to make sure that private rented properties are safe, and are well maintained and healthy places to live. They provide advice and assistance to both tenants and landlords to make sure a property meets the correct standards and complies with the relevant legislation and, where standards are not maintained, the team has powers of enforcement to ensure that works are carried out.
- Food Safety, including food poisoning, unfit food and private water supplies.
- Health and Safety at ~~w~~Work, [Health and Safety Breaches](#).
- ~~Licensing, including the sale of alcohol, entertainment, animal licensing [and animal welfare](#), caravan [and camping](#) sites, houses in multiple occupation, hackney carriage and private hire vehicles, gaming machines, lotteries, street/house to house collections and street trading.~~
- Public health, [private drainage](#) and pest control regulation.
- Waste, including fly-tipping and environmental crime

16.5.2 [The Council has responsibility for Anti-Social Behaviour \('ASB'\) under the Anti-Social Behaviour, Crime and Policing Act 2014 and works with Thames Valley police. The types of ASB the Council typically deals with range from environmental issues such as littering and fly-tipping, and dog behaviour nuisance to personal ASB such as neighbour disputes, street drinking/ aggressive begging or substance misuse.](#)

16.5.3 [There are many different legislative powers and remedies available to Environmental Services when dealing with regulatory enforcement including but not limited to:](#)

- [Power to require information.](#)
- [Civil Penalties for Private Sector Housing offences.](#)
- [Fixed Penalty Notices.](#)
- [Community Protection Notices and Community Protection Warnings.](#)
- [Abatement Notices with respect to Statutory Nuisance.](#)
- [Injunctions and Criminal Behaviour Orders \(in conjunction with the Police\)](#)
- [S.20 Health and Safety at Work Act 1974 Powers for the purpose of carrying into effect any of the relevant Statutory Provisions.](#)
- [Works in Default.](#)
- [Prosecution.](#)

16.5.4 The **Environmental Health** Service is consulted on planning and licensing applications and where appropriate conditions are recommended.

16.5.5 The relevant Policies referred to in connection with enforcement issues for Environmental and ~~Regulatory~~ **Health** Services are listed in **Annex 21**. The responsibilities for decisions are also detailed therein.

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16.6 Licensing

16.6.1 Licensing has a number of enforcement powers and duties to regulate the range of authorisations it is responsible for including The Licensing Act 2003, Gambling Act 2005, Animal Welfare, Hackney Carriage and Private Hire licensing, sex establishments, Pavement Licensing and other miscellaneous licensing and registrations.

16.6.2 The aim of the licensing team is to protect consumers, residents and businesses in the District through enforcing licensing regimes and associated legislation. It further ensures the integrity of the licensing regime, fairness and consistency.

16.6.3 A variety of enforcement options are set out below which could be used at any stage, they are not sequential.

- **Advice** - In the first instance and in most cases, consideration will be given to whether advice regarding a breach or potential breach of legislation is appropriate. When advice is given, it will normally be put in writing unless the breach is very minor or the matter is rectified on the spot. A written note or record of advice will be recorded and held on record.
- **Warning Letter/Notice** - In certain circumstances, it may be appropriate to issue a warning letter bringing alleged offences to the attention of the person responsible for the alleged breach indicating ways to avoid commission of similar offences in the future. A warning letter should be given when the requirements for a simple caution are not met or the need to formally record the caution is not applicable. In either case it is essential that sufficient admissible evidence is available to substantiate the offence. A written warning letter/notice will be recorded and held on record.
- **Simple Caution** - The Council may issue a caution where there is sufficient evidence to prosecute but where the public interest is not served by issuing proceedings. A simple caution will be issued in accordance with this Policy.
- **Licensing Review** – There are a number of statutory and discretionary licensing powers for a Licensing Authority to determine a review of a licence or other authorisation. Officers can request the Licensing Authority to review the licence because of an adverse matter arising in connection with any aspect of that licence or other authorisation.
- **Immediate Action(s)** - In certain cases, immediate action to suspend, revoke or otherwise restrict a licence or other authorisation can be taken to protect the public from harm.
- **Prosecution** - A prosecution is appropriate where there is a breach of a legal requirement, such that public safety, health, economic or physical well-being or the environment or environmental amenity is adversely affected.
- **Injunction**: in severe cases where either a previous significant breach has occurred, conviction followed, and the breach reoccurs a civil injunction may be appropriate. Equally, it may be that the breach is so significant in terms of protecting the public it is deemed necessary to issue an injunction without any other previous action having been taken.

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16.7 Land and Property

- 16.7.1 The Council will deal with enforcement in relation to land drainage matters. In most cases the owner of land next to a watercourse is the “Riparian Owner”. The legal responsibility for maintaining watercourses rests with the Riparian Owner. Where a watercourse passes over someone’s land, the Riparian Owner has to keep it clear to allow water to flow freely through it. Further, it is usually the landowner’s responsibility to maintain a watercourse that forms a boundary with a public highway.
- 16.7.2 Where the Flood Engineering Service investigates and gathers evidence which identifies that the Riparian Owner has failed to fulfil his/her duty, the Council has the power to serve a notice under section 25 of the Land Drainage Act 1991. The Notice will include the nature of the works to be carried out and the period within which they are to be carried out.
- 16.7.3 If, following service of the Notice, the Riparian Owner fails to carry out the required works, the Council can carry out the work and charge the owner for the costs incurred. The Council can also take a prosecution in the Magistrates’ Court under Section 25(6)b, in addition to carrying out the work.
- 16.7.4 The Council has a protocol which it has signed up to. This sets out in more details the Council’s powers and the procedure that will be used for land drainage enforcement.
- 16.7.5 Problems will be categorised as urgent or non-urgent. If a problem is categorised as urgent, attendance will be arranged as soon as possible. Examples of matters requiring urgent action may include blockages to a watercourse causing immediate or imminent flooding of property.
- 16.7.6 In the event that immediate urgent action is deemed necessary, arrangements will be made to send appropriate services to the scene without delay. If the situation appears to be life-threatening or dangerous, the public emergency services will be contacted.

16.8 Revenues and Benefits

- 16.8.1 Responsibility for investigating and prosecuting cases of Housing Benefit fraud has transferred to the Department for Work and Pensions. The Council administers Housing Benefit and still has the power to impose Civil Penalties (or fines) in relation to overpayments of Housing Benefit. In respect of Council Tax and the Council Tax Reduction Scheme (formerly Council Tax Benefit) the Council has the ability to impose Civil Penalties as well as take criminal action, to include Cautions, penalties and prosecution. The Council’s policy in relation to the application of both civil and criminal sanctions can be found within the ***Council Tax, Housing Benefit and Council Tax Support Penalty and Prosecution Policy*** which can be found on the Council’s website www.westoxon.gov.uk
- 16.8.2 In relation to National Non Domestic Rates, the Council may commence civil or criminal proceedings where appropriate.
- 16.9 ~~Counter Fraud Unit~~ **Counter Fraud and Enforcement Unit**
- 16.9.1 ~~The Counter Fraud Unit~~ **Counter Fraud and Enforcement Unit (CFEU)** is a support service offering investigation and assistance with enforcement and criminal action across the Council. The CFEU has a specific responsibility to investigate all allegations of fraud received whether perpetrated by internal or external parties. The CFEU will work to support other enforcement teams within the Council where appropriate and will take action to include offering Cautions, imposing fines /penalties and commencing prosecution proceedings as applicable.
- 16.9.2 The remit of the CFEU encompasses investigating issues such as internal or employee fraud, theft, procurement or contract fraud, tenancy and housing fraud, and any other area as requested.
- 16.9.3 The CFEU will consider criminal proceedings in all cases where offending contrary to any of the following has occurred, although the list is not exhaustive:

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- Theft Acts 1968 and 1978.
- Forgery and Counterfeiting Act 1987.
- Computer Misuse Act 1990.
- Social Security Administrative Act 1992.
- Local Government Finance Act 1992.
- Data Protection Act Regulations / Legislation.
- Identity Card Act 2006.
- Fraud Act 2006.
- The Bribery Act 2010 (with the consent of the Director of Public Prosecutions or the Serious Fraud Office).
- Welfare Reform Act 2012.
- The Prevention of Social Housing Fraud Act 2013.
- Council Tax Reduction Scheme (Detection of Fraud and Enforcement) (England) Regulations 2013.

16.10 **Parking Services**

16.10.1 Parking Enforcement is carried out under the Traffic Management Act 2004.

16.10.2 Civil Enforcement Officers are employed to enforce on and off street parking for the ~~Boroughs, Districts and County Council~~. This service may be contracted out or conducted by an in house service.

16.10.3 A Penalty Charge Notice can be issued if a vehicle is parked in contravention of the restrictions which are in force.

16.11 **Liaison with other Agencies**

16.11.1 The Council will maintain effective mechanisms for communication and liaison with all its services and other agencies and may have a joint enforcement role where appropriate.

16.11.2 If another agency is better able to provide a service in any particular case, the Council will either;

- (a) pass on the relevant details to that agency and, where appropriate, advise the complainant and contravener accordingly or
- (b) give contact details of the other agency to the complainant in order for them to make direct contact.

16.12 **Publicity**

16.12.1 The Council may actively inform the media of impending prosecutions, with the aim of drawing their attention to the court case. After the case the Council may publicise any conviction which could serve to draw attention to the need to comply with legislation or deter anyone tempted to break the law.

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~~ANNEX 1 PLANNING LOCAL ENFORCEMENT PLAN (WEST OXFORDSHIRE DISTRICT COUNCIL)~~

~~1 GENERAL~~

- ~~1.1 The vast majority of breaches of planning control are resolved informally through negotiation which is generally the Council's preferred method. This may involve the contravener submitting a retrospective planning application, reflecting the development as built or a modified version incorporating changes advised by Officers to render it acceptable. Submission of an application, if granted also affords the Local Planning Authority (LPA) the opportunity to impose conditions so that a use or structure becomes acceptable.~~
- ~~1.2 It should be noted that in cases of advertisements being displayed illegally or works being carried out to listed buildings without consent, contraveners remain liable to prosecution and associated court costs for the offence committed unless consent is obtained.~~
- ~~1.3 In some situations, the Council may allow time to remedy a situation, such as by voluntary relocation or removal of the unauthorised development. However, the formal enforcement procedure can be a lengthy process itself and such leeway will not be allowed to delay effective action unnecessarily.~~
- ~~1.4 Where informal resolution cannot be achieved, there are a variety of formal tools available to the Council.~~

~~2 PLANNING CONTRAVENTION NOTICE AND OTHER PRE-EMPTIVE POWERS~~

- ~~2.1 In order to confirm the existence and nature of a breach, the LPA may serve a Planning Contravention Notice (PCN) under s171C of the Town and Country Planning Act 1990 (as amended). As well as an information-gathering tool, the PCN serves as a statement of intent of enforcement action by the LPA, formally demonstrating that it takes seriously the matter in question. This, on most occasions, deters further non-compliance. Indeed, the PCN offers the contravener an opportunity to meet appropriate officers to agree a plan of remedial measures. Failure to respond within time or at all, or replying with false or misleading information, constitutes a criminal offence and may lead to a penalty of up to a maximum of £5,000.~~
- ~~2.2 Alternatively, the LPA can issue a notice under s.16 of the Local Government (Miscellaneous Provisions) Act 1976 or s.330 of the principal Act with respect to specific matters only (for example names, addresses and nature of interest; and use of premises, dates and names, addresses and interest of users respectively). The LPA can also undertake ownership searches of the land.~~

~~3 ENFORCEMENT NOTICE~~

- ~~3.1 This is the principal tool to remedy a breach. It imposes a legal duty on those with an interest in the land to effect certain remedial measures specified in the Notice within a specific period (being no less than 28 days). Recipients may appeal to the Planning Inspectorate, effectively suspending the Enforcement Notice until it is determined. Enforcement Notices are entered on the Local Land Charges Register (LLCR) and Planning Enforcement Register (PER) so run with the land, remaining effective, even once complied with. Non-compliance constitutes a criminal offence for which recipients may be prosecuted and, if~~

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found guilty, may be liable to a fine of up to a maximum of £20,000 together with costs and a criminal record.

3.2 — An Enforcement Notice cannot be issued where the breach involves the occupation of a building as a dwelling for a period of more than four years, where development has been substantially completed for a period in excess of four years or where a change of use of land or buildings has occurred for a period in excess of ten years.

4 — LISTED BUILDING ENFORCEMENT NOTICE

4.1 — This is the equivalent Notice available under the Listed Building legislation. This Notice may be issued at any time and is not subject to the time constraints imposed upon an Enforcement Notice. The same penalties will apply as above. Any person who intentionally causes or undertakes works which is likely to result in damage to a Listed Building shall be guilty of an offence subject to a fine of up to £1,000 and daily penalties if the works do not cease.

5 — APPEALS

5.1 — Appeals against Enforcement Notices and Listed Building Enforcement Notices can delay matters whilst they are considered by the Planning Inspectorate.

6 — BREACH OF CONDITION NOTICE

6.1 — This remedy is available in the event of non-compliance with a condition. There is no right of appeal and the penalty for non-compliance is a fine up to a maximum of £1,000. It is not entered on the LLGR.

7 — STOP NOTICE

7.1 — In the most serious cases the Council may decide to issue a Stop Notice. This requires cessation after a minimum of 3 days, of unauthorised activities where they cause severe harm to local amenity. If a statement of special reasons is attached, the Notice may come into effect within 3 days. The duty to comply is universal and not limited to recipients of the Notice.

7.2 — However, its disadvantage is that it can only be served with or after an Enforcement Notice but before the effective date. Also, it cannot prohibit the use of a building as a dwelling nor any operational development, if carried out for more than 4 years before service.

7.3 — The improper use of a Stop Notice incurs the LPA risking liability to and compensating owners or occupiers for losses directly attributable to the service of the Notice.

7.4 — The fine for breaching a stop notice is currently £20,000 with an unlimited fine on indictment.

8 — TEMPORARY STOP NOTICE

8.1 — This recently introduced measure has a number of advantages. First, it is effective immediately and does not require the prior service of an Enforcement Notice. Moreover, the risks of liability for compensation are negligible if the notice is issued correctly. However, it can subsist for a maximum of 28 days only and cannot be renewed unless an Enforcement

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Notice is also served. Further advice on Temporary Stop Notices can be found in ODPM Circular 02/2005 (Temporary Stop Notices).

8.2 The fine for breaching the notice is the same as for a Stop Notice.

9 COURT INJUNCTION

9.1 This may be sought in the most serious cases to restrain anticipated breaches as well as to prevent actual breaches. Non-compliance is considered to be a contempt of court and may result in a fine and/or imprisonment. However, this remedy is costly to the Council and depends upon the discretion of the judge.

10 UNTIDY LAND (S.215) NOTICE

10.1 This encompasses buildings as well as land. The LPA need only show that amenity is adversely affected by the state of the premises. Appeals are to the Magistrates' Court and not to the Secretary of State. Non-compliance constitutes a criminal offence for which Notice recipients may be prosecuted and are liable to a fine up to a maximum of £1,000.

11 ADVERTISEMENTS

11.1 All sites for the placement of advertisements, other than those that are exempt under the terms of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, require consent – be that deemed or express. Any person who displays an advertisement on a site in contravention of the Regulations is guilty of an offence under section 224 (3) of the Town and Country Planning Act 1990 and currently liable to a fine on conviction of up to £2,500.

11.2 A Discontinuance Notice can be served in respect of adverts that have deemed consent and this is the relevant and more stringent power to remedy a 'substantial injury' to an amenity or where danger is caused to members of the public. The Notice cannot take effect less than 8 weeks after the service date and can be appealed.

12 PROSECUTION

12.1 Prosecution is one of the remedies available in respect of a breach of any of the Notices listed above (excluding Court Injunctions) and this action will be taken where there is sufficient evidence and it is in the public interest in accordance with the Code of Crown Prosecutors.

12.2 Defendants may thus be deterred from continued non-compliance, as well as punished for proven breaches. If found guilty of the offence the Defendant will incur the costs of the Council in bringing the prosecution, any resultant fines imposed, any costs incurred themselves directly in seeking legal representation, and have a resultant criminal record.

13 DIRECT ACTION (WITH COSTS RECOVERY)

13.1 This is potentially the quickest remedy and involves the Council itself taking steps to remedy the breach, for example by removing an unauthorised building. The Council then recovers the costs of this from the offender. Unlike prosecution, exercising such default powers secures actual resolution. These powers only arise in the event of non-compliance with enforcement and untidy land notices. Further legal action may also need to be taken to

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~~recover the costs which can be a lengthy and expensive process. However, it should be noted that the costs can be pursued through a civil action and can be registered as a local land charge and therefore, should be recovered if the land is sold. In addition, it may be possible for the Council to force the sale of the land in order to recover these costs.~~

~~13.2 — It should be noted that there is no specific budget available within the Council finances for this course of action to be taken and the initial cost to the Council to remedy the breach can be significant.~~

~~14 — HOW WE INVESTIGATE PLANNING ALLEGED BREACHES~~

~~14.1 — Reactive Enforcement~~

~~14.2 — We will acknowledge all complaints about alleged unauthorised development within 7 days of receipt and will visit the site within 14 days. We will set out the Councils position in writing to the developer and complainant within 8 weeks of the original complaint~~

~~14.3 — We will invite the submission of a retrospective application where unauthorised development is considered acceptable or could be made so through negotiation or the imposition of conditions. We will aim to take enforcement action swiftly where unauthorised development is considered to be harmful and there is little prospect of the harm being removed voluntarily or being made acceptable through the imposition of conditions on a planning permission~~

~~14.4 — Proactive Enforcement~~

~~14.5 — To achieve compliance with approved schemes we will monitor selected developments and consider enforcement action swiftly where any deviation from approved plans or non-compliance with conditions is considered harmful or attempts to remedy the situation voluntarily have failed~~

ANNEX 21 ENVIRONMENTAL AND REGULATORY HEALTH SERVICES

1 CURRENT POLICIES RELEVANT TO ENFORCEMENT CONSIDERATIONS

Private Sector Housing Policy ~~riet Council, West Oxfordshire District Council and Cotswold District Council.~~

Houses in Multiple Occupation ('HMO') Amenity Standards

Civil Penalties and Enforcement Policy for Housing Offences under the Housing and Planning Act 2016.

Charging for Notice Policy under the Housing Act 2004. Forest of Dean District Council, West Oxfordshire District Council and Cotswold District Council.

Guidance Note for Gloucestershire Authorities, reference: Protocol between Local Housing Authorities and Fire and Rescue Authorities to improve fire safety. Forest of Dean DC, Cotswold DC only.

~~Houses in Multiple Occupation~~ **HMO** and Other Domestic Premises: Oxfordshire Fire and Rescue Service

Organisational Document: Technical Guidance Note.

Mobile Homes Policy: ~~Forest of Dean District Council, West Oxfordshire District Council and Cotswold District Council.~~

Hackney Carriage and Private Hire Licensing Policy.

Street Trading Policy.

2 **PROCESS RESPONSIBILITIES FOR ENVIRONMENTAL HEALTHERS DECISIONS**

The Service has what can be broadly summarised as a three stage approach to enforcement to ensure solutions are initially sought through education, co-operation and agreement.

These may be dictated internally, through the adoption of service standards or they may be dictated externally; for example, legislation and statutory guidance require risk assessments for food safety inspection programmes which will determine future inspection frequency.

However, situations brought to light through inspections or complaints will be dealt with according to their seriousness.

At one extreme, this would mean no action for minor and trivial issues, whilst at the other; it could mean the prohibition of an activity or business operation.

Priority, risk and action relate to each other through this staged approach to enforcement.

A low risk offence may proceed through each stage until compliance is achieved, although the evidential and public interest test considerations will apply. A high risk offence is likely to proceed directly to stage 3.

- Stage 1**
- Advice
 - Verbal warning
 - Informal letters
 - Initial inspections and visits
 - Acceptable Behaviour Contracts
 - Formal letters
 - Written warnings

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- Negotiated solutions
- Stage 2**
 - Formal Notices (requiring remedial action), Fixed Penalty Notices, Orders
 - Warrants
- Stage 3**
 - Court injunction
 - Emergency action
 - Works in default/seizure of goods
 - Civil Penalty - Housing and Planning Act 2004
 - Warrants
 - Review and /or revocation of licences and approvals
 - Simple caution
 - Prosecution
 - Removal of unauthorised or dangerous structures or abandoned vehicles.

3 DECISION MAKING

Responsibility for decisions at each stage

Stage 1: Decisions to take these actions will rest with the Investigating Officers

Stage 2: The Case Officer shall review the case with the relevant Principal Officer or Service Leader before a decision is made, except with respect to the following, which fall under Stage 1:

- Notices with respect to abandoned vehicles
- Fixed penalty notices with respect to littering, fly-tipping and abandoned vehicles
- Notices requiring information

Stage 3: The Investigating Officer must ~~compile~~ carry out an enforcement review of the case for the attention of the Service Leader. For prosecution or civil penalty, the case shall be reviewed by a Legal Officer and Service Leader or Service Business Manager independent of the investigation. Certain types of cases, in accordance with the Officer Delegation Rules, may have to be referred to the relevant committee for approval.

Emergency Action

Where urgent or immediate action is required, decisions will rest with the duly delegated and authorised investigating officer.

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Equality and Ruralty Impact Assessment Form

When completing this form you will need to provide evidence that you have considered how the ‘protected characteristics’ may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet

Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Emma Cathcart	
Date of assessment: 21.11.2025	Telephone: 01285 623000 Email: Emma.Cathcart@cotswold.gov.uk

2. Name of the policy, service, strategy, procedure or function:

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Is this a new or existing one? Existing

3. Briefly describe it aims and objectives

<p>The policy sets out the Council’s enforcement tools, and the considerations adopted when determining whether enforcement action should be taken and if so, what that action should be taken.</p> <p>Training to be delivered and awareness to be raised after adoption of the policy to ensure the appropriate application of enforcement activities.</p> <p>The Policy is applicable to enforcement staff across the Council and impacts members of the public.</p> <p>Prosecutions will only be considered where the evidential and public interest tests are met with due consideration to the welfare of individuals. Appropriate enforcement activity acts as a deterrent and benefits the public as a whole.</p>

4. Are there any external considerations? (e.g. Legislation/government directives)

Yes - legislation

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	<input type="checkbox"/>	
Recent research findings including studies of deprivation	<input type="checkbox"/>	
Results of recent consultations and surveys	<input type="checkbox"/>	
Results of ethnic monitoring data and any equalities data	<input type="checkbox"/>	
Anecdotal information from groups and agencies within Gloucestershire	<input type="checkbox"/>	
Comparisons between similar functions / policies elsewhere	X	Comparison and inclusion of existing Policy across partner Council's. Departmental Policies.
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	X	Consultation with legal representatives, service leads and corporate management. National guidance.

6. Please specify how intend to gather evidence to fill any gaps identified above:

N/A

7. Has any consultation been carried out?

Yes

Details of Consultation
 Consultation with Legal Representatives across the Partnership
 Consultation with Enforcement Lead Officers across the Partnership
 Consultation with Corporate Leadership Team

If NO please outline any planned activities

8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	X
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
Comments: e.g. Who will this specifically impact? Individuals who are subject to enforcement action.	

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9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

Negative – it could disadvantage and therefore potentially not meet the General Equality duty;

Positive – it could benefit and help meet the General Equality duty;

Neutral – neither positive nor negative impact / Not sure

	Potential Negative	Potential Positive	Neutral	Reasons	Options for mitigating adverse impacts
Age – Young People			x		
Age – Old People		x		The Policy provides that enforcement action may not be appropriate in relation to older offenders	
Disability		x		The Policy provides that enforcement action may not be appropriate in cases where the offender has a disability	
Sex – Male			x		
Sex – Female			x		
Race including Gypsy and Travellers			X		
Religion or Belief			X		
Sexual Orientation			X		
Gender Reassignment			X		
Pregnancy and maternity			X		
Geographical impacts on one area			X		
Other Groups		x		The Policy provides that enforcement action may not be appropriate in cases where the offender lacks mental capacity	
Rural considerations: ie Access to services; leisure facilities, transport; education; employment; broadband.			X		

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10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale

11. Is there is anything else that you wish to add?

No

Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed By:	Emma Cathcart	Date:	21.11.2025
Line Manager:	David Stanley	Date:	
Reviewed by Corporate Equality Officer:		Date:	

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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>FINANCIAL PERFORMANCE REPORT 2025/26 QUARTER THREE</p>
<p>Wards affected</p>	<p>All</p>
<p>Accountable member</p>	<p>Cllr Alaric Smith Executive Member for Finance Email: alaric.smith@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Madhu Richards, Director of Finance Email: madhu.richards@westoxon.gov.uk</p>
<p>Report Author</p>	<p>Georgina Dyer, Head of Finance Email: georgina.dyer@westoxon.gov.uk</p>
<p>Annexes</p>	<p>Annex A – Detailed Revenue Budget Comparison Annex B – Capital Spend against Budget</p>
<p>Purpose</p>	<p>To detail the Council’s financial performance for Quarter Three 2025-2026</p>
<p>Recommendation</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> 1. Note the Council’s Financial Performance for Quarter Three 2025-2026 2. Delegate authority to the Director of Finance, in consultation with the Executive Member for Finance, to review earmarked reserves to mitigate against the financial risks identified in this report. See Sections 2.21 – 2.24.
<p>Corporate Priority</p>	<p>Working Together for West Oxfordshire</p>
<p>Key Decision</p>	<p>Yes</p>
<p>Exempt</p>	<p>No</p>
<p>Consultees</p>	<p>None</p>

1. BACKGROUND

- 1.1. The purpose of this report is to provide an update on the financial performance of the council's activities for the first three quarters of the 2025/26 financial year from 1 April 2025 to 31st December 2025.
- 1.2. The report considers the significant variances in revenue income and expenditure against the approved revenue budget set by Full Council on 26th February 2025 which anticipated a contribution of £91,280 to General Fund reserves.
- 1.3. The report also includes progress in delivering the approved Capital Programme and a forecast revenue position at year end. This forecast should be viewed as indicative only at this stage of the financial year.

2. MAIN POINTS

Financial Performance Revenue Budget Monitoring - Summary

- 2.1. At quarter 3 (Q3) there is an overall cost of service underspend of **£630,078** against the profiled budget for the period. The key factors driving this revenue position are additional income from Trade Waste, Development Management and the leisure contract. Development Management income is 70.7% up on the same period last year due to the receipt of major applications, Trade Waste is up 21.4% and the leisure contract has returned an additional £101,609.
- 2.2. There are no significant overspends to report for Q3, but any variance to the profiled budget that is over £10,000 has been included in this report.
- 2.3. Investment income through our Treasury Management activity is again performing significantly above budget, due in the main to interest rates falling more slowly over the last year than anticipated at the time of setting the 2025/26 budget. Our Treasury Management Advisors believe that there is likely to be one more interest rate cut of 0.25% this financial year. The year end forecast is an additional £596,000 of Investment interest above budget.
- 2.4. The table below sets out the summary revenue monitoring position for the 31 December 2025 against profiled budget by service area.

WEST OXFORDSHIRE DISTRICT COUNCIL - Budget Monitoring

Revenue Budget Monitoring 2025/26 - Quarter 3, 1st April to 31st December 2025

Service Area	Quarter 3				
	Original Budget 2025/26	Current Budget	Actual Exp	Variance (under) / over spend	Forecast to Year End
	£	£	£	£	£
Democratic and Committee Services	1,412,297	1,185,917	1,179,781	(6,136)	(5,631)
Environmental & Regulatory Services	784,557	434,003	468,300	34,297	43,297
Environmental Services	8,285,567	5,655,041	5,511,323	(143,718)	(134,494)
Finance, Human Resources & Procurement	1,062,851	969,667	950,512	(19,155)	4,231
ICT, Change & Customer Services	2,230,097	2,792,731	2,799,479	6,747	8,000
Land, Legal & Property	841,492	970,108	965,510	(4,598)	9,500
Leisure & Communities	555,410	(596,517)	(686,592)	(90,075)	(106,104)
Planning & Strategic Housing	1,383,153	986,815	601,176	(385,638)	(341,974)
Revenues & Housing Support	1,592,014	528,162	518,350	(9,812)	(2,120)
Investment Property and Retained Services	682,434	105,168	93,177	(11,991)	826
Total cost of services	18,829,872	13,031,095	12,401,017	(630,078)	(524,469)
<u>Plus:</u>					
Investment income receipts	(1,156,228)	(867,171)	(1,249,389)	(382,218)	(596,000)
Cost of services before financing:	17,673,644	12,163,924	11,151,628	(1,012,295)	(1,120,469)

Significant Variances

A full list of variances by cost centre is included in Annex A. The most significant variances, listed by Service Area (as set out in the table above), are as follows:

Environment & Regulatory Services

2.5. Building Control

Building Control has met the income target for the first three quarters of the year but is overspent by £9,415 in staff overtime and £5,998 in mileage that were not budgeted for in 2025/26, following the TUPE of staff from Publica back to the Council. This issue has been addressed in the 2026/27 budget.

2.6. Markets

A commercial operator now manages the markets in Witney & Chipping Norton. The outsourcing is designed to revitalise the markets with income to the Council increasing over time. At the point of transfer, income was at 50% of the budgeted target, a £17,000 overspend at Q2. At the end of Q3 the overspend has risen to £22,407, an improvement over the Q2 trajectory of 14.5%.

Land, Legal & Property

2.7. Corporate Buildings

The overspend of £22,162 is driven mainly by £11,000 Standby pay. Standby charges are incurred to lock/unlock Council buildings for example after evening committee meetings and for call outs to attend Council premises if the fire or security alarms are activated. Until the end of June 2025 this out of hours work was undertaken by Ubico but since the TUPE of the Property & Assets team back to the Council in July 2025, members of Council staff have taken on the responsibility.

Environmental Services

2.8. Green Waste

Green Waste licence income has achieved £1.655m at the end of Q3, which represents 95.8% of the target for the year. Work is ongoing with Ubico to make sure that the contract sum is split accurately across Waste, Recycling and Cleansing so that the Council can have assurance that commercial elements of waste collection and recycling are, at the very minimum, covering their costs. Licences for the 2026/27 year were made available online at the beginning of February and have so far returned £427,875.

2.9. Trade Waste

Trade Waste is invoiced in April & September with payment taken by Direct Debit. In Q3 income is £223,000 above target and tipping charges are £10,000 underspent. This is partially offset by expenditure of £30,000 on bins and boxes which is expected to remain at the same level to year end.

The forecast year end position is an underspend of £220,000 which considers additional income generated in the last quarter of the year. The budget for 2026/27 has been adjusted to reflect the positive performance of the Trade Waste service and the contribution to service delivery. The performance of the Trade Waste service can be attributed to the active management of the customer base, invoicing and income collection by the Publica Trade Waste team in conjunction with the Council's Waste team and Ubico.

2.10. Downs Road Depot

Repairs and maintenance costs for the Depot now sit with the Council rather than being recharged to Ubico. The result is the Ubico contract sum is reduced and therefore attracts a lower central overhead. The costs are now in the Environmental Services budget with the year-to-date expenditure at £41,000. The 2026/27 budget includes an allocation for depot repairs and maintenance as part of the Council Buildings maintenance programme.

2.11. Bulky Waste

The service has achieved income of £15,000 over and above the budget up to Q3 and is forecast to achieve an additional £5,000 by the end of the year.

2.12. Household Waste

There is an overspend of £30,000 for replacement bins and expenditure of £22,000 on the Alloy Environmental Services Management system, used to streamline waste collection, street cleaning, and maintenance operations. It is designed to manage waste, recycling, and environmental services through real-time data, in-cab technology, and mobile applications. The renewal of the software licence has been included in the budget for 2026/27.

2.13. Dog Warden

The costs against this cost centre are for kennelling stray dogs. At Q3 there is an underspend of £24,000, a 58% reduction in demand compared to the same period last year. By its nature, this service is subject to demand volatility.

2.14. Car Parking

The budget for the year includes £30,000 for car park maintenance, identified as part of the updated Car Parking Strategy. So far, the majority of this budget has not been spent, creating a £25,000 underspend in Q3.

Leisure and Communities

2.15. Recreational Facilities Development

There is a £16,000 overspend relating to the repayment of an unused portion of grant funding from Sports England as the project came in under budget. This was not known until after the 2024/25 year end and therefore it was not accrued for. The remainder of the expenditure is within the existing base budget.

2.16. Contract Management

The budget includes £50,000 for external legal advice related to the negotiation of the extension to the leisure contract from 2027. This legal advice is likely to be taken in Q4 and the first part of 2026/27. Unbudgeted spend includes £9,975 for the installation of energy saving showers at Carterton LC. There are also a number of minor overspends for the appraisal of Carterton LC roof repairs and professional advice on the specification of Solar PV installed. The annual contract income is increased by CPI inflation mid-year and could bring the year end contract sum to a forecast of £110,000 above budget.

Planning & Strategic Housing

2.17. Development Management

Planning Application income is £449,000 above target at Q3 due to the receipt of major applications, offset by £90,000 of expenditure on agency staff. This income is an increase of £585,000 on the same period last year, an indication of the volatility of application income and the difficulty in setting an appropriate budget. The income budget has been revised upwards for 2026/27 in line with advice from the Development Manager and the Head of Planning.

2.18. Development Management Appeals

The underspend relating to appeals is £59,145 year to date. It is difficult to predict when planning appeals will be lodged, or to forecast whether the full budget will be exhausted by the end of the year. The budget for 2026/27 has been reviewed and has been reduced by £50,000.

Retained Services

2.19. External Audit Fees

The fees for the audit of the 2025/26 financial year were published at the end of November. The base budget includes £158,000 for the audit of the Statement of Accounts and a further £50,000 for the audit of the Housing Benefit system, both of which are statutory requirements. There will likely also be additional costs for the increased audit assurance requirements relating to the adoption of Accounting Standard IFRS 16, Leases, related to the 2024/25 Statement of Accounts that will be charged in 2025/26 producing an estimated overspend at year end of £40,000.

2.20. Investment Property

Investment Property and Industrial Estates combined are £10,159 underspent at the end of Q3. Within the portfolio there are individual properties that are performing either well above or below targets i.e. Talisman income is £80,000 above budget due to the base budget not taking into account the end of a rent-free period in the first quarter of the financial year. This underspend is expected to increase to around £118,000 by year end.

At the other end of the scale, Carterton Industrial Estate is £77,732 overspent due to costs to keep Units 1 – 3 secure and for preparations in advance of the construction of the new roof, including repairs to the rolling shutters, electricity supply works, surveys and inspections. The forecast for year-end assumes a continuation of security measures until the construction phase has been completed.

Earmarked Reserves

2.21. The Capital Programme proposes the use of £1m of earmarked reserves to fund Investment Property repairs in 2026/27 and 2027/28 instead of relying on internal borrowing. Capital expenditure funded through internal or external borrowing requires the Council to charge the revenue budget for Minimum Revenue Provision (MRP) to “pay back” the borrowing, as defined in the Treasury Management Strategy 2026/27. The use of earmarked reserves therefore removes the burden of additional MRP on the revenue budget.

2.22. The statutory override for Financial Instruments (pooled funds), which requires fair value gains and losses to be taken to an unusable reserve unless the fund is sold, was set to end in 2025/26. It was therefore recommended by our Treasury advisors Arlingclose, that it would be prudent to create an earmarked reserve to smooth out the impact of any unrealised gains or losses to protect our revenue position and our ability to fund front line services. This was approved by the Executive in February 2024.

The government subsequently announced that the statutory override would remain in place until the end of the 2027/28 financial year. In September 2024 one of our Pooled Funds,

operated by UBS, was closed, resulting in a capital loss of £497,000. The £200,280 balance in this reserve is no longer required.

- 2.23. The acquisition of 8 additional temporary accommodation properties by the end of this financial year, as outlined in the budget report 2026/27, will require funding for refurbishment works and ongoing maintenance.
- 2.24. It is requested that authority is given to the Director of Finance, in consultation with the Executive Member for Finance, to review existing earmarked reserves to better align them with Council Priorities, to set up the specific risk reserve for Local Government Reorganisation as per the 2026/27 budget report, to top up the existing Investment Property reserve by £1m, to close the Financial Instrument Revaluation reserve and to allocate £500,000 for the refurbishment and ongoing maintenance of Council owned properties.

Capital Programme

- 2.25. At the end of Q3 capital expenditure is £4,024,078 against an approved Capital Programme for the year of £16.165m, which includes slippage from 2024/25 of £4.9m related to the decarbonisation of Witney Leisure Centre, Waste Vehicle replacement and repairs to our buildings. (See Annex B).
- 2.26. The Witney PSDS project is now in the construction phase with an estimated completion date of March 2026. The Leisure, Assets and Climate teams are working together to deliver the project and are working in conjunction with GLL to mitigate any operational issues caused by the construction works. The Council has received grant funding of £1.649m towards the cost of this project, with an estimated contribution from the Council of £565,549.
- 2.27. The Council completed the acquisition of a property in Witney in the first week of November which will provide 5 temporary emergency accommodation beds, the first property completion in a programme providing 30 additional emergency accommodation beds before the end of the financial year. The purchase of a second property in North Leigh was completed at the beginning of January and will provide emergency accommodation for 4 families.
- 2.28. This programme is on track to deliver all 30 beds, with legal work currently in progress to complete on a further 6 properties by the end of Q4. These properties have been surveyed and roof replacement in 3 of the properties will be required. This gives the Council the opportunity to upgrade the insulation in the properties which concurs with advice provided by the Climate Manager and supports climate emergency goals for WODC.
- 2.29. Expenditure on Council owned assets relates to the works on the roof of The Old Court, dilapidations at Chawley Park and fuel bunkering at the Down's Road depot. The replacement roofing works at Units 1-3 Carterton Industrial Estate and Station Lane moved

to the construction phase in November for completion in Spring 2026. These works will fully exhaust the £1,500,000 in the capital programme by the end of the financial year.

3. CONCLUSIONS

- 3.1. There are some key areas of optimism at the end of Q3, and these have been highlighted in the body of this report. There are no significant overspends in the first three quarters of the year with the forecast for year-end as a significant cost of service underspend, combined with an estimated Investment income from Treasury Management activity of around £596,000 above budget.
- 3.2. The forecast is extremely encouraging, but we must look ahead and prepare to fund the cost of the next stage of Local Government Reorganisation (LGR). There is currently no indication that there will be any funding from central government to help with these costs which are likely to be significant. Whilst the outcome of LGR for Oxfordshire will not be known until Q1 or Q2 of 2026/27, it is deemed prudent to set aside earmarked reserve funds in 2026/27 to fund a Project Office in the first instance.
- 3.3. All areas will be closely monitored and reported on in the final quarterly Financial Performance Report of 2025/26.

4. FINANCIAL IMPLICATIONS

These are set out within section 2 of the paper.

5. LEGAL IMPLICATIONS

There are no legal implications arising from this paper.

6. RISK ASSESSMENT

- 6.1. Officers will continue to monitor budgets closely throughout the year to identify mitigating actions which will enable the overall budgetary position to be brought back in line with budget where possible.

7. EQUALITIES IMPACT

No direct equalities impact with regards to the content of this report.

8. CLIMATE CHANGE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

None arising from this report.

Annex A - Comparison of Q3 Budget Monitoring

	Q3 position			Forecast to Year End
	Current Budget	Actual Exp	Variance (under) / over spend	
	£	£	£	£
Democratic Services				
DRM001-Democratic Representation	238,598	248,416	9,818	7,500
DRM002-Support To Elected Bodies	397,108	389,553	(7,555)	(8,500)
ELE001-Registration of Electors	227,604	221,221	(6,383)	(2,500)
ELE002-District Elections	4,500	3,411	(1,089)	0
ELE004-Parliamentary Elections	104,899	105,034	135	0
ELE005-Parish Elections	0	4,869	4,869	4,869
ELE006-County Elections	88,703	88,661	(42)	0
ELE008-Police & Crime Commissioner Elections	7,821	7,821	(0)	0
SUP001-Administration	116,685	110,796	(5,889)	(7,000)
Total - Democratic Services	1,185,917	1,179,781	(6,136)	(5,631)

	Q3 position			Forecast to Year End
	Current Budget	Actual Exp	Variance (under) / over spend	
	£	£	£	£
Environmental & Regulatory Services				
BUC001-Building Control - Fee Earning Work	50,596	68,518	17,922	18,500
BUC002-Building Control - Non Fee Earning Work	2,513	3,635	1,122	1,122
EMP001-Emergency Planning	22,943	16,845	(6,098)	(8,000)
ESM001-Environment - Service Mgmt & Supp Serv	76,898	76,898	0	0
PSH002-Private Housing-Condition of Dwellings	2,250	0	(2,250)	0
REG001-Environmental Health General	0	0	0	0
REG002-Licensing	(82,017)	(88,660)	(6,643)	(5,000)
REG009-Environmental Protection	158,848	166,978	8,130	9,500
REG011-Authorised Process	(8,890)	(7,903)	987	987
REG013-Pollution Control	97,259	98,071	812	812
REG016-Food Safety	108,837	105,665	(3,172)	(4,500)
REG021-Statutory Burials	3,750	4,830	1,080	0
STC011 - Abandoned Vehicles	0	(1,750)	(1,750)	0
TAC309-Other Trading Services - Markets	575	22,982	22,407	29,876
Total - Environmental & Regulatory Services	434,003	466,550	32,547	43,297

BUC001 - the overspend comprises £9,000 of overtime and £6,000 of mileage that is not budgeted for in 2025/26, following the TUPE of staff from Publica back to the Council. This budget has been reviewed for 2026/27 to ensure all employee costs are included.

TAC309 - The markets in Witney and Chipping Norton are now managed by a commercial operator. As the new model develops and attracts more traders to the revitalised markets, income is expected to grow over time. The income target has been reviewed as part of the 2026/27 budget setting process.

	Q3 position			
	Current Budget	Actual Exp	Variance (under) / over spend	Forecast to Year End
	£	£	£	£
Finance, Human Resources & Procurement				
SUP003-Human Resources	236,781	241,733	4,951	5,000
SUP009-Accountancy	312,284	303,701	(8,583)	0
SUP010-Internal Audit	174,748	179,479	4,731	4,731
SUP011-Creditors	33,101	29,137	(3,965)	(1,500)
SUP012-Debtors	46,000	39,617	(6,382)	(2,500)
SUP013-Payroll	44,273	40,291	(3,983)	(2,500)
SUP019-Health & Safety	25,708	25,791	83	100
SUP020-Training & Development	22,336	22,525	189	200
SUP033-Central Purchasing	29,248	29,907	658	700
SUP035-Insurances	7,502	7,502	0	0
Total - Finance, Human Resources & Procurement	962,812	950,512	(12,300)	4,231

	Q3 position			
	Current Budget	Actual Exp	Variance (under) / over spend	Forecast to Year End
	£	£	£	£
ICT, Change & Customer Services				
SUP002-Consultation, Policy & Research	3,803	990	(2,813)	(2,500)
SUP005-ICT	1,042,235	1,047,561	5,326	6,000
SUP008-Reception/Customer Services	455,330	452,672	(2,659)	(2,500)
TMR002-Street Furniture & Equipment	(12,962)	(6,070)	6,892	7,000
Total - ICT, Change & Customer Services	2,792,731	2,799,479	6,747	8,000

	Q3 position			Forecast to Year End
	Current Budget	Actual Exp	Variance (under) / over spend	
	£	£	£	£
Land, Legal & Property				
ADB301-3 Welch Way (Town Centre Shop)	6,693	547	(6,145)	(5,000)
ADB302-Guildhall	7,695	2,541	(5,154)	(4,500)
ADB303-Woodgreen	217,688	208,715	(8,972)	(8,500)
ADB304-Elmfield	(103,000)	(106,170)	(3,170)	(1,500)
ADB305-Corporate Buildings	853,711	867,146	13,436	16,000
ADB306-Depot	101,492	103,706	2,214	4,000
FIE346-Marriotts	(484,654)	(483,230)	1,424	3,000
LLC001-Local Land Charges	(45,156)	(44,116)	1,040	2,500
SUP004-Legal	180,090	178,489	(1,601)	0
TAC303-Swain Court	235,550	237,881	2,332	3,500
Total - Land, Legal & Property	970,108	965,510	(4,598)	9,500

ADB305 - the overspend is made up mostly of £11,000 in Standby pay (the costs to have the building unlocked & locked after hours and for call outs relating to any alarm activations) that is not budgeted for in 2025/26, following the TUPE of staff from Publica back to the Council. This budget has been reviewed for 2026/27 to ensure all employee costs are included.

	Q3 position			Forecast to Year End £
	Current Budget £	Actual Exp £	Variance (under) / over spend £	
Leisure & Communities				
CCR001-Community Safety (Crime Reduction)	173,251	177,580	4,329	5,000
CCR002-Building Safer Communities	19,500	23,854	4,354	5,000
CCR301 - Communities Revenue Grant	288,000	285,416	(2,584)	15,000
CCT001-CCTV	80,850	86,576	5,726	6,000
CSM001-Cultural Strategy	66,574	63,355	(3,219)	(4,500)
CUL001-Arts Development	5,716	(1,253)	(6,969)	(7,000)
ECD001-Economic Development	116,535	116,986	452	0
ECD010 – SPF Community and Place	(541,975)	(541,975)	0	0
REC001-Sports Development	156,576	157,237	661	0
REC002-Recreational Facilities Development	49,313	65,202	15,889	16,500
REC003-Play	65,984	67,412	1,428	1,428
REC301-Village Halls	11,236	11,236	0	0
REC302-Contract Management	(1,373,504)	(1,475,113)	(101,609)	(135,000)
SUP016-Finance - Performance Review	83,525	83,525	0	0
TOU001-Tourism Strategy and Promotion	83,589	75,057	(8,532)	(8,532)
Total - Leisure & Communities	(714,831)	(804,906)	(90,075)	(106,104)

CCR301 - there is an error in the base budget which will create an overspend of £17,000 by year end. This budget has been corrected for 2026/27.

REC002 - the overspend is a repayment to Sports England prior year unused grant money that was not spent as the project came in under budget. This was not known until after the year end 2024/25 so it was therefore not accrued for. The remainder of expenditure is within existing budget.

REC302 - The budget includes £50,000 for external legal advice related to the negotiation of the new leisure contract for 2027. This legal advice is likely to be taken in Q4 and the first part of 2026/27. Unbudgeted spend includes £9,975 for the installation of energy saving showers at Carterton LC. There are also number of minor overspends for the appraisal of Carterton LC roof repairs and professional advice on the specification of Solar PV installed. The annual contract income is increased by CPI inflation mid year and could bring the year end contract sum to a forecast of c£110,000 in excess of budget.

	Q3 position			Forecast to Year End £
	Current Budget £	Actual Exp £	Variance (under) / over spend £	
Environmental Services				
CCC001-Climate Change	108,655	116,331	7,676	1,077
COR301-Policy Initiatives - Shopmobility	12,306	12,306	(0)	0
CPK001-Car Parks - Off Street	173,741	151,454	(21,377)	(21,000)
ENI002-Grounds Maintenance	468,575	465,355	(3,220)	1,000
ENI303-Landscape Maintenance	58,371	51,216	(7,155)	(2,223)
FLD001-Flood Defence and Land Drainage	132,851	133,492	641	1,066
REG004-Dog Warden	35,000	10,867	(24,133)	(24,000)
REG019-Public Conveniences	132,631	130,803	(1,828)	6,000
REG023-Environmental Strategy	61,224	60,389	(835)	(578)
RYC001-Recycling	1,718,673	1,711,612	(7,061)	(2,000)
RYC002-Green Waste	(688,940)	(652,721)	36,219	65,000
RYC003-Food Waste	807,505	801,728	(5,777)	(3,851)
STC004-Environmental Cleansing	690,357	697,666	7,309	(2,340)
TRW001-Trade Waste	17,133	(186,486)	(203,619)	(220,000)
TRW002-Clinical Waste	(375)	0	375	250
WST001-Household Waste	1,727,047	1,782,201	55,154	45,105
WST004-Bulky Household Waste	13,436	(2,094)	(15,530)	(20,000)
WST301-Env. Services Depot, Downs Rd, Witney	186,851	228,043	41,193	42,000
Total - Environmental Services	5,655,041	5,512,163	(141,968)	(134,494)

CPK001 - At Q3 there is a budget of £25,000 for repairs and maintenance that has not yet been spent.

REG004 - the Council has a responsibility to collect and kennel stray dogs until their owners can be found. The cost at Q3 is a 58% reduction on the same period in 2024/25. Clearly this statutory service is subject to volatility of demand.

RYC002 -the service has achieved 96% of the income target in 2025/26. Licences for 2026/27 have been available online since the beginning of February and have so far returned £427,875.

TRW001 - Trade Waste income is £223,000 ahead of target and tipping charges are £10,000 underspent. This is partially offset by £30,000 of expenditure on replacement bins.

WST001 - there is an overspend of £30,000 on replacement bins and expenditure of £22,000 on the Alloy environmental services management system. A budget for the renewal of the software licence has been included in the 2026/27 budget.

WST004 - Bulky Waste income is £15,000 above target with a forecast of £20,000 at year end.

WST301 - Repairs and maintenance costs for the Depot now sit with the Council rather than being recharged to Ubico. Year to date this expenditure is £41,000 and is forecast to remain at this level at year end. The 2026/27 budget includes an allocation for depot repairs.

	Q3 position			
	Current Budget	Actual Exp	Variance (under) / over spend	Forecast to Year End
	£	£	£	£
Planning & Strategic Housing				
DEV001-Development Control - Applications	(326,595)	(648,553)	(321,957)	(300,000)
DEV002-Development Control - Appeals	161,805	102,660	(59,145)	(40,000)
ENA001-Housing Enabling	114,239	111,613	(2,627)	(2,561)
ENI301-Landscape Initiatives	43,607	42,727	(880)	(880)
HLD315-Growth Board Project (Planning)	5,526	2,820	(2,707)	170
PLP001-Planning Policy	704,594	707,439	2,845	2,845
PLP004-Conservation	189,840	190,203	363	452
PSM001-Planning Service Mgmt & Support Serv	93,028	91,498	(1,530)	(2,000)
Total - Planning & Strategic Housing	986,815	601,176	(385,638)	(341,974)

DEV001 - Income is £449,000 above target due to major applications that have been received. This is offset by £90,000 of agency staff, £13,000 to the County Council for the Thames Valley Environmental Records Centre and a number of small

DEV002 - it is difficult to predict when planning appeals will be lodged or to forecast whether the full budget will be exhausted by the end of the year. The budget for 2026/27 has been reduced by £50,000.

	Q3 position			Forecast to Year End £
	Current Budget £	Actual Exp £	Variance (under) / over spend £	
Retained Services				
COR002-Chief Executive	385,623	388,666	3,044	5,000
COR003-Corporate Policy Making	56,609	56,031	(577)	0
COR004-Public Relations	304,873	302,697	(2,176)	0
COR005-Corporate Finance	532,841	534,373	1,532	2,500
COR006-Treasury Management	20,025	18,900	(1,125)	(1,500)
COR007-External Audit Fees	156,234	156,677	443	40,000
COR008-Bank Charges	58,875	47,568	(11,307)	(15,000)
COR012 - Publica Review	177,968	179,429	1,461	0
COR302-Publica Group	220,639	219,807	(832)	0
FIE341-Town Centre Properties	(421,812)	(429,115)	(7,303)	(8,500)
FIE342-Miscellaneous Properties	(56,029)	(59,167)	(3,139)	1,000
FIE343-Talisman	(1,242,120)	(1,318,816)	(76,696)	(118,000)
FIE344-Des Roches Square	(439,036)	(443,070)	(4,034)	(5,000)
FIE345-Gables at Elmfield	0	5,415	5,415	6,500
NDC001-Non Distributed Costs	612,000	622,037	10,037	15,000
TAC304-Witney Industrial Estate	(128,565)	(130,310)	(1,745)	(2,400)
TAC305-Carterton Industrial Estate	(132,319)	(54,587)	77,732	85,000
TAC306-Greystones Industrial Estate	(7,763)	(8,150)	(387)	(774)
TAC308-Other Trading Services - Fairs	7,126	4,794	(2,332)	(3,000)
Total - Retained Services	105,168	93,177	(11,991)	826

COR007 - fees for the audit of the 2025/26 financial year were published at the end of November. The base budget includes £158,000 for the audit of the Statement of Accounts and a further £50,000 for the audit of our Housing Benefit system, both of which are statutory requirements. In recent years the final cost of the external audits has been higher than the original PSAA fee due to the additional assurance required for property valuations and the introduction of new Accounting Standards i.e. IFRS16 Leases.

FIE343 - Rental income for Unit 13 has been incorrectly excluded from the base budget for 2025/26, this error has been corrected for the 2026/27 budget but will cause a £107,000 underspend in the current financial year, giving a Q3 underspend for income of £80,000

TAC305 - the overspend relates to business rates and expenditure to secure the vacant units 1 - 3 in advance of the construction of the new roof, including repairs to the rolling shutters, electricity supply works, surveys and inspections. The forecast for year end assumes a continuation of security measures until the construction phase has been completed.

	Q3 position			
	Current Budget	Actual Exp	Variance (under) / over spend	Forecast to Year End
	£	£	£	£
Revenues & Housing Support				
HBP001-Rent Allowances	316,108	315,438	(670)	(1,500)
HOM001-Homelessness	(56,908)	(59,423)	(2,515)	(5,029)
HOM004-Refugees	0	0	0	0
HOM005-Homelessness Hostel Accommodation	(2,993)	(3,421)	(428)	5,000
HOM006 - The Old Court	50,404	45,864	(4,541)	(4,541)
HOM007-Afghan Resettlement Programme	(254,396)	(254,395)	1	0
HOM008-Homes for Ukraine	18,102	18,102	0	0
LTC001-Council Tax Collection	360,029	354,351	(5,679)	(5,000)
LTC011-NNDR Collection	99,611	105,273	5,662	7,500
PSH001-Private Sector Housing Grants	39,080	39,505	425	450
PSH004-Home Improvement Service	(40,877)	(43,611)	(2,734)	1,000
Total - Revenues & Housing Support	528,162	518,350	(9,812)	(2,120)

Capital Programme 2025/26

Scheme	Funded By	2025/26 Total Budget	Q3 Actual	
Asset Repairs	Borrowing	1,500,000	287,610	a
Ubico Fleet - Replace Vehicle Hire Costs	Borrowing	4,721,266		b
Replacement Sweepers	Borrowing	850,000		
In Cab Technology	Borrowing	100,000		
Witney ATP Refurbishment	Revenue Contribution	200,000		
Purchase of Temporary Accommodation	Capital Receipts	3,000,000	562,754	c
CCTV - Upgrading	Capital Receipts	255,635	247,180	
Improvement Grants (DFG)	Grant	880,000	838,265	
UK Rural Prosperity Fund	Grant	0	108,282	
Witney Leisure Centre PSDS	Grant/Borrowing	1,584,841	78,713	d
Carterton Leisure Centre Solar PV Installation	Grant	0		
Chipping Norton Leisure Centre PSDS	Grant/Borrowing	2,643,926		
IT Provision - Systems & Strategy	Revenue Contribution	100,000		
Council Buildings Maintenance Programme	Revenue Contribution	250,000	243,112	
IT Equipment - PCs, Copiers etc	Revenue Contribution	40,000	45,559	
Chipping Norton Creative	S106	0	21,805	
Windrust Place Public Art	S106		3,226	
Carterton Connects Creative (Swinbrook s106)	S106	39,500		
Developer Capital Contributions	S106	0	1,587,571	e
		16,165,168	4,024,078	

- a. Expenditure relates to the works on the roof of The Old Court and internal works at Chipping Norton Leisure Centre. The replacement roofing works at Units 1-3 Carterton Industrial Estate and Station Lane are moving to the construction phase in November for completion in Spring 2026. These works will fully exhaust the £1,500,000 in the capital programme by the end of the financial year.
- b. A full waste vehicle strategy will be coming forward from the Waste Transformation Programme for Member consideration in Q4. This strategy will look to maximise the efficiencies attainable through partnership working across the County, that the Council could never achieve through unilateral action.
- c. The Council completed the acquisition of a property in Witney in the first week of November. This property will provide 5 bedrooms and requires only modest works before tenants can move in. A second property has been acquired in North Leigh which will provide accommodation for 4 families. Completion negotiations are at an advanced stage on a further 6 properties suitable for temporary emergency accommodation, both for single people and families. These properties will however require reconfiguration and upgrading.
- d. The Witney PSDS project began the construction phase in September and has an estimated completion date of the March 2026.
- e. Developer Capital contributions are the amount of \$106 that the Council has paid out to Parish and Town Councils so far this financial year.

 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and Date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>SERVICE PERFORMANCE REPORT 2025-26 QUARTER THREE</p>
<p>Wards Affected</p>	<p>ALL</p>
<p>Accountable Member</p>	<p>Councillor Andy Graham – Leader of the Council. Email: andy.graham@westoxon.gov.uk</p>
<p>Accountable Officer</p>	<p>Giles Hughes – Chief Executive Officer. Email: giles.hughes@westoxon.gov.uk</p>
<p>Report author</p>	<p>Alison Borrett – Senior Performance Analyst. Email: alison.borrett@westoxon.gov.uk</p>
<p>Purpose</p>	<p>To provide details of the Council’s operational performance at the end of 2025-26 Quarter Three (Q3).</p>
<p>Annex</p>	<p>Annex A - Council Priorities report Annex B - Corporate Plan Action Tracker Annex C - Performance indicator report</p>
<p>Recommendation.</p>	<p>That the Executive Resolves to: I. Note the 2025/26 Q3 service performance report.</p>
<p>Corporate Priorities</p>	<ul style="list-style-type: none"> • Putting Residents First • Enabling a Good Quality of Life for All • Creating a Better Environment for People and Wildlife • Responding to the Climate and Ecological Emergency • Working Together for West Oxfordshire
<p>Key Decision</p>	<p>NO</p>
<p>Exempt</p>	<p>NO</p>
<p>Consultees/ Consultation</p>	<p>Publica Directors, Business Managers, Service Managers and Service Leads.</p>

1. BACKGROUND

- 1.1** The new Council Plan was adopted in January 2023 and the Action Plan, setting out how the priorities within the Council Plan will be delivered, then followed. Additionally, following on from the external audit report in August 2023 which included a recommendation to review performance management to match the Council Plan and measure performance, a new performance framework has been developed. This includes a Corporate Action Plan Tracker and a Priority Report alongside the service output metrics.
- 1.2** A high-level Commissioning Framework was approved by the Executive in October 2020, which sets out the relationship between Publica and the Council and their respective responsibilities. Publica provides the necessary information, including a range of performance indicators, to the Council so it can assess whether the commissioned services are being delivered in accordance with the agreed quality and standard.
- 1.3** The Council's Chief Executive is responsible for reviewing and approving the information provided in this report prior to its publication.

2. COUNCIL PRIORITY REPORT

2.1 Progress on actions in the Corporate Plan for Q3 include:

- Key lettings at Marriotts Walk progressed during the quarter, with agreements secured for Units 6, 14a and 11a. Based on square metreage, current occupation now stands at just below 97%, with only one unit remaining vacant and continued work is underway on public-realm design improvements.
- The Salt Cross Area Action Plan moved closer to adoption, following receipt of the Planning Inspector's final report, with Full Council consideration expected in February 2026.
- The Windrush Leisure Centre decarbonisation project continues to progress and surpassed a major milestone in Q3 with the installation of the new low-carbon heating system and removal of the asbestos boiler. Additional decarbonisation measures are scheduled for future phases of the programme.
- Community grant delivery advanced strongly, with a Food Officer appointed for January 2026 and 22 projects approved through the Witney Community Insight Profile grant round.
- Westhive Round 5 was completed, with 10 community projects receiving Council and community pledges. In addition, Executive approved continuing the council's community crowdfunding approach for a further three years by moving to a new platform, building on experience from the previous provider.
- Market town support continued to scale, with 14 Shop Front Improvement Grants on track for award and additional grants expected to assist up to 19 local businesses.
- Development of the Woodford Way business case has progressed, supported by a revised site layout that integrates housing and parking. The proposal was endorsed by the Executive in January, including an initial timetable, design approach, parking solutions, and the planned planning and consultation stage.

- 2.2** The Council Priority highlight report is attached at Annex A with an overview of progress against all actions in the Corporate Plan is attached at Annex B.

3. SERVICE PERFORMANCE

Overall, the Councils performance remained strong across many key services, with high customer satisfaction, excellent planning determination times, robust business rates collection and continued growth in leisure participation. Council Tax collection also remained close to target, and several regulatory indicators continued to perform well. Environmental performance also strengthened this quarter, with fly-tips collected decreasing year-on-year by 25%. In addition, 31 enforcement actions were taken in relation to fly-tipping incidents, reflecting the Councils' continued focus on prevention and compliance.

A smaller number of services experienced ongoing pressure, particularly in the processing of Housing Benefit and Council Tax Support changes, where in-quarter improvements have not yet offset the cumulative impact of earlier delays and increasing case complexity. FOI response times dipped below target and Land Charges performance was temporarily affected by staffing shortages, though early signs of recovery are evident. Recycling rates continue to reflect seasonal and national trends. Taken together, Q3 demonstrates strong and consistent delivery across priority services, with targeted improvement work in place where performance remains below expectations.

3.1 Service performance above target:

- Percentage of Non-Domestic Rates Collected (83.15% against a target of 81%)
- Processing times for Council Tax Support new claims (19.06 days against a target of 20 days)
- Customer Satisfaction (97.44% against a target of 90%)
- Building Control Satisfaction (96.67% against a target of 90%)
- Percentage of major planning applications determined within agreed timescales (90.01% against a target of 70%)
- Percentage of minor planning applications determined within agreed timescales (93.94% against a target of 65%)
- Percentage of other planning applications determined within agreed timescales (98.99% against a target of 80%)
- Percentage of Planning Appeals Allowed (cumulative) (28% against a target of 30%)
- Number of Affordable Homes Delivered (267 against a target of 207)
- Percentage of high-risk food premises inspected within target timescales day (100% against a target of 90%)
- Percentage of high-risk notifications risk assessed within 1 working day (100% against a target of 95%)
- Missed bins per 100,000 (39.62 against a target of 120)
- (Snapshot) Number of gym memberships (5,668 memberships against a target of 5,075 memberships)
- Number of visits to the leisure centres (237,216 visits against a target of 178,574)

3.2 Service Performance near target:

- Percentage of Council Tax Collected (84.78% against a target of 85%)
- Residual Household Waste Collected per Household (kg) (91.23kg against a target of 90kg)

3.3 Service Performance below target:

Processing times for Council Tax Support Change Events (8.33 days against a target of 5 days) and Processing times for Housing Benefit Change of Circumstances (7.59 days against a target of 4 days)

The Council saw a reduction in processing times for both Council Tax Support (CTS) change of events and Housing Benefit (HB) changes of circumstances compared to Q2. However, cumulative averages remain above the respective targets of 5 days for Council Tax Support and 4 days for Housing Benefit.

Although the cumulative processing time for Council Tax Support Change of Events remains above target, in-quarter performance continued to improve. The average processing time between October and December was 3.74 days, which is within the service target. While further reductions are expected, the cumulative nature of the measure means it is unlikely to return within target before the end of the financial year.

Housing Benefit continues to experience pressure, driven by the complexity of cases and the volume of DWP-mandated Full Claim Reviews. Many of these reviews require extensive evidence, creating unavoidable delays even as the team works to keep cases moving. The remaining HB caseload is now highly concentrated among pension-age households and temporary accommodation, meaning fewer routine income changes are coming through. With a smaller flow of day-to-day updates, any delay has a sharper impact on overall processing times, though the team continues to prioritise the most time-sensitive and higher-risk cases.

To strengthen financial resilience for residents, the Council continued to deliver targeted support through the Low Income Family Tracker (LIFT) during the quarter. Key campaigns included:

- Benefit Maximisation – Outreach to households on Universal Credit not receiving Council Tax Reduction, as well as residents potentially eligible for Pension Credit and Attendance Allowance.
- Housing Related Support – Targeted communications to households affected by welfare reforms, including those impacted by the Benefit Cap, Bedroom Tax and Local Housing Allowance pressures.
- Financial Hardship Intervention – Engagement with Council Tax Reduction customers showing signs of arrears or financial stress to offer early support and signposting.
- Accuracy and Assurance – Ongoing checks on severe disability entitlements, with no changes affecting Quarter 3 performance.

These campaigns are helping the Council proactively identify financially vulnerable households and ensure residents receive the support they are entitled to.

Percentage of Housing Benefit overpayment due to LA error/admin delay (0.51% against a target of 0.35%)

The Council exceeded the national 0.48% target this quarter due to one significant claim overpayment identified by officers. In total, 2,080 Housing Benefit claims have been paid, comprising 1,842 normal claims and 238 temporary accommodation claims. Of these, 64 normal claims and 4 temporary accommodation claims were identified as having overpayments made on them. Although the error rate continues to fall, it is unlikely to meet the service target this quarter; however, it is expected to return within the national threshold by the end of Q4. Any Government penalties would be based on the final year-end figure.

To address overpayment risk, the service has put in place a range of targeted interventions. Around 20% of the Housing Benefit caseload is undergoing enhanced Quality Assurance checks, with a particular focus on areas with historically higher error rates, such as earnings assessments, to identify and correct issues before they result in overpayments. Staff are receiving strengthened training and ongoing technical support to ensure accurate processing, while internal procedures are being refined to streamline assessments and reduce avoidable delays. This includes further use of automation where appropriate.

The Council is also continuing its participation in the DWP's Housing Benefit Award Accuracy (HBAA) initiative, which provides additional assurance through joint work aimed at reducing fraud and error. The service remains mindful of the pressures created by increased workloads, including the potential for processing delays that could affect subsidy levels. Taken together, these measures are designed to reduce overpayments attributable to local authority error and support the Council in meeting expected performance levels in the final quarter of the year.

Percentage of FOI requests answered within 20 days (81.17% against a target of 90%)

During Q3, the Council responded to 81.17% of Freedom of Information (FOI) requests within the 20-day timeframe, a decline from 83.16% in Q2 and below the target of 90%. The majority of requests continue to be directed toward Development Management, Environmental Services (ERS), Revenues and Benefits and Housing, reflecting sustained public interest in these areas.

To strengthen transparency and improve FOI performance, the Council is taking a proactive approach to reviewing internal processes and identifying opportunities for improvement. This includes exploring ways to streamline request handling, enhance coordination across high-volume service areas, and reinforce awareness of statutory response times. By embedding best practices and promoting a culture of responsiveness, the Council aims to restore compliance with national standards and ensure residents continue to receive timely access to information.

Percentage of official land charge searches completed within 10 days (55.47% against a target of 90%)

During Q3, the Council experienced a downturn in performance against the 10-day target for processing Land Charges searches. This was primarily the result of the unexpected loss of a team member in September, which significantly reduced capacity at a point when demand remained steady. The reduction in resource led to a build-up of outstanding cases and a temporary fall in overall service performance.

In response, the service has implemented resilience measures, including bringing in additional administrative support to increase throughput and focus on clearing the older cases in the backlog. These interventions have helped stabilise day-to-day operations, and early performance data indicates that processing times are beginning to improve.

Percentage of household waste recycled (55.72% against a target of 62%)

During Q3, the household recycling rate fell by around 1.5% compared with the same period last year, bringing current performance to 55.72%, below the Council's 62% target. Although the yearly percentage has decreased, there is no indication that the introduction of the booking system at recycling centres is contributing to this, as recycling tonnages for the quarter remain broadly consistent with last year's levels.

Alongside operational performance, the Council delivered a range of targeted seasonal communications, including Christmas campaigns promoting correct recycling of packaging, wrapping paper, cardboard, and other festive waste, helping residents understand what can and cannot be recycled. The Council also regularly shares national and sector-led campaign content from organisations such as Alupro (covering aluminium packaging recycling) and Love Food Hate Waste, amplifying consistent behavioural messages when these organisations have campaigns running. These combined efforts support residents to recycle correctly and reduce contamination levels.

Nationally, recycling rates continue to vary widely: in 2023/24, councils in England recorded household recycling rates ranging from 15.8% to 62.9%, with a provisional national average of 42.2%, highlighting the considerable spread between the highest- and lowest-performing areas. Against this backdrop, West Oxfordshire continues to perform strongly, ranking 16th of 197 waste collection authorities in England for 2023–24, with a recycling rate of 57.2%, placing the district firmly within the top tier nationally.

Despite being below target for the quarter, the Council's current rate of 55.72% remains well above the national average and consistent with Oxfordshire's reputation as one of the leading areas in England for recycling. All Oxfordshire districts continue to outperform the wider national picture, underscoring the region's strong culture of waste reduction, reuse, and recycling, supported by ongoing engagement and public-facing campaigns.

3.4 A full report is attached at Annex C and should be looked at in conjunction with this report.

3.5 As previously agreed, where possible, broader benchmarking has been included in the full performance report to gain a more robust and insightful evaluation of performance.

4. DELTA DISABLED FACILITIES GRANTS SCORECARD

4.1 The DELTA Disabled Facilities Grants Scorecard provides an annual overview of the Council's performance in delivering Disabled Facilities Grants. It summarises key measures such as the number of completed adaptations, who receives support and the time taken to progress cases from application through to completion. Developed by Foundations using statutory DELTA returns submitted by each local authority, the scorecard offers a balanced and accessible assessment of service performance, highlighting areas of strong delivery as well as emerging pressures. DELTA is the primary online platform used by the Ministry of Housing, Communities and Local Government (MHCLG) for collecting statistical data and grant information, providing a single, centralised system for submissions.

4.2 In 2024–25, West Oxfordshire performed strongly against national comparators, ranking within the top 7.6% of local authorities for delivery times. This reflects effective case-flow management and a sustained focus on timely outcomes for residents with mobility or independence needs.

4.3 For full context, the current and previous years' DELTA DFG Scorecards should be reviewed together, as they provide a clear picture of performance trends and the impact of improvement activity over time. These can be found [here](#).

5. OVERVIEW AND SCRUTINY COMMITTEE

- 5.1** This report will be reviewed by the Overview and Scrutiny Committee at its meeting on 4 March 2026. The draft minutes of that meeting will be circulated to all Members and any recommendations from the Committee will be reported to the 11 March 2026 Executive meeting.

6. FINANCIAL IMPLICATIONS

- 6.1** There are no direct financial implications from this report.

7. LEGAL IMPLICATIONS

- 7.1** None specifically because of this report. However, a failure to meet statutory deadlines or standards in some services may expose the Council to legal challenge and/or financial liability.

8. RISK ASSESSMENT

- 8.1** Contained in this report.

9. EQUALITIES IMPACT

- 9.1** None

10. SUSTAINABILITY IMPLICATIONS

- 10.1** A Sustainability Impact Assessment (SIA) is not required because it is a quarterly review report for the Executive to note.

11. BACKGROUND PAPERS

- 11.1** None

(END)

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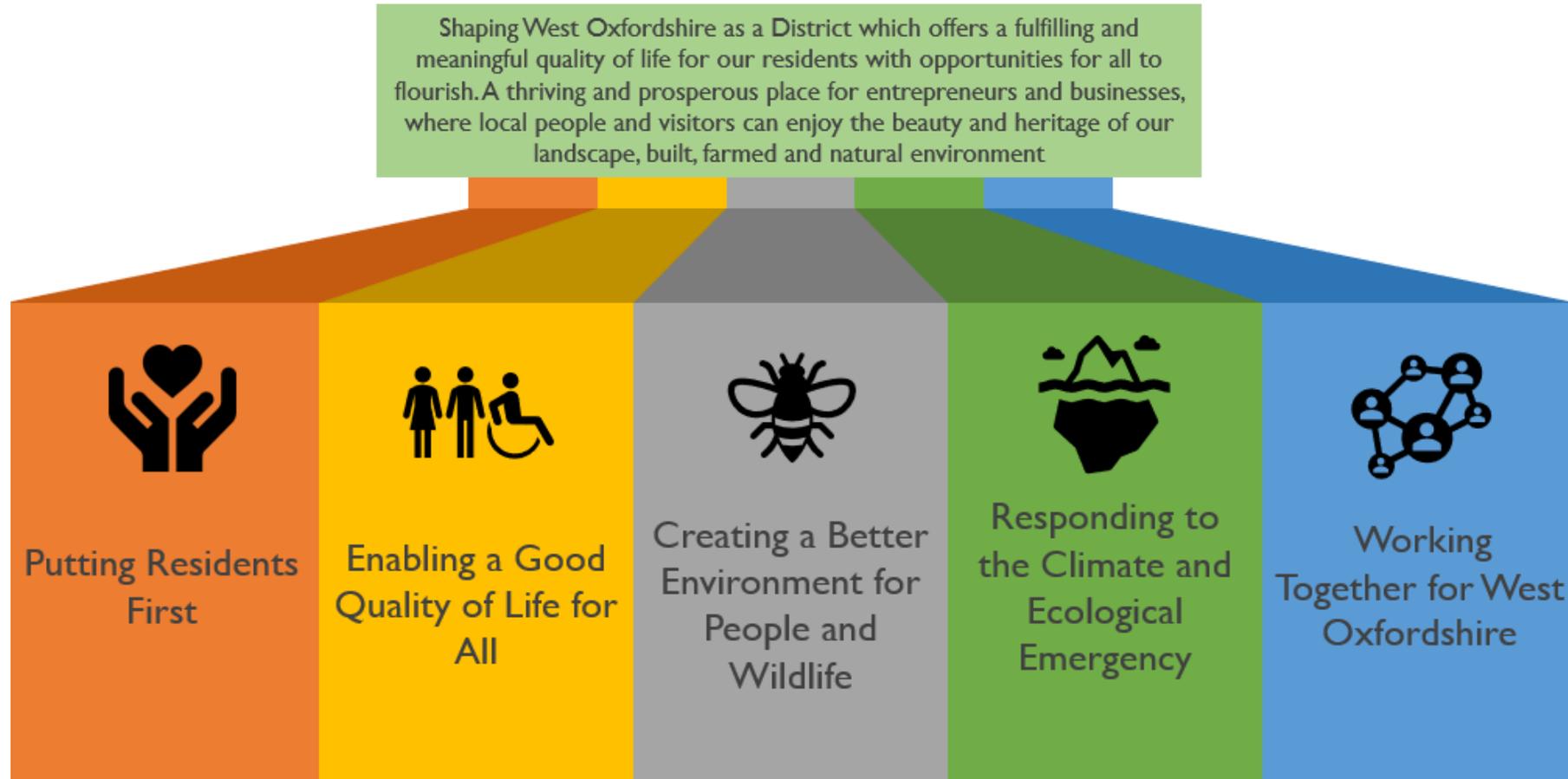


WEST OXFORDSHIRE
DISTRICT COUNCIL

COUNCIL PRIORITIES REPORT
October – December 2025

Background

The Executive Action Plan was created to outline the steps needed to carry out the vision of the Executive after the new Council Plan was adopted in February 2023. In the Council Plan, the Executive looks to the district's future and establishes a vision for West Oxfordshire. In addition to updating the public on the status of each priority at regular meetings across the plan's four-year duration, a new performance framework has been created to offer timely updates for actions taken in relation to the priorities.



Putting Residents First



Actions we are taking

In early 2022, West Oxfordshire District Council conducted its first Youth Needs Assessment, gathering structured responses from 3,908 young people attending seven secondary schools or colleges, alongside feedback from parents and youth organisations. The assessment revealed significant challenges, including limited access to activities, widespread mental health concerns, safety issues, climate anxiety, and barriers linked to education, employment, and support services. Following a review of the findings in October 2023, the Council committed to strengthening youth engagement and approved the recruitment of a full-time Youth Development Officer in February 2024. By September 2025, the officer had engaged extensively with community groups, parish and town councils, Oxfordshire County Council, Thames Valley Police, specialist youth agencies, councillors, and internal teams, reinforcing six thematic youth priorities: developing new provision, sustaining existing services, improving safety and wellbeing, supporting education and skills, promoting volunteering, and amplifying youth voice.

Key initiatives emerging from this work include supporting the revival of youth clubs in areas with limited provision, such as Eynsham and Stonesfield, and facilitating multi-agency partnerships to address anti-social behaviour, mental health, and community safety. This includes ongoing collaboration with Witney Town Council and Thames Valley Police to strengthen coordinated responses to youth issues. The Council is also promoting youth-friendly employment, expanding engagement with both state and private schools, and exploring the development of a Youth Assembly to involve young people in climate action and local democratic processes. To widen opportunities, the Youth Development Officer is additionally working with sports clubs to reduce participation barriers and supporting initiatives to improve youth volunteering, including through local employers.

To support youth-led innovation, the Council allocated £20,000 from its COMF budget for initiatives delivered through Westhive, its civic crowdfunding platform. By Spring 2025, 12 youth-focused projects had been successfully funded, attracting over £412,000 in total pledges. Westhive's broader programme continues to grow, with 38 projects supported and more than £1.16 million pledged across the platform by 2025. Within this total, 2025 funding rounds saw £124,000 committed to 10 new community projects (including young carers and arts-based initiatives), and a further £114,000 directed to projects improving accessibility, biodiversity and family services. The Council continues to pledge up to £12,000 per project, with at least £20,000 ring-fenced annually for youth-led ideas.

The Council's commitment to youth and housing is further reflected in the 'Our House' project, delivered in partnership with Cottsway Housing and Aspire Oxfordshire. The initiative provides shared, affordable accommodation and tailored employment, training, and wellbeing support for young adults under 35 on out-of-work benefits, enabling them to build independence and progress into education, employment, and long-term housing. In July 2024, the Executive approved a two-year funding extension from November 2024 to October 2026, ensuring the programme's stability and permitting continued partnership working and potential external funding applications.

In parallel with these strategic initiatives, the Council remains actively engaged in shaping the future structure of local government through the Local Government Reorganisation (LGR) process. In November 2025, five of the seven councils across Oxfordshire and West Berkshire—including West Oxfordshire—formally backed a proposal to replace existing district and county councils with two new unitary authorities. They argued that this model offered the strongest improvements in services, the greatest annual savings (estimated at £59.8 million), and the best balance between efficiency and local accountability. Under the proposal, Oxford and Shires Council would encompass Cherwell, Oxford City, and West Oxfordshire, while Ridgeway Council would cover South Oxfordshire, the Vale of White Horse, and West Berkshire. A full joint submission was made to Government at the end of November 2025.

This two-unitary model is being considered alongside two competing proposals: a single Oxfordshire-wide unitary authority put forward by Oxfordshire County Council, and a three-unitary model led by Oxford City Council, featuring Greater Oxford, Northern Oxfordshire, and Ridgeway councils. All proposals will be assessed by Government, with a final decision expected in 2026 and implementation anticipated in 2028.

Enabling a Good Quality of Life for All



Actions we are taking

The Community Infrastructure Levy (CIL) Charging Schedule was adopted on 1 October 2025 and comes into effect for planning permissions granted from 31 January 2026. Preparations for implementation have continued at pace, including detailed staff training, the configuration of back-office systems and financial processes, and the development of clear guidance to support applicants and developers. This work ensures the Council will be ready to collect and allocate CIL from the effective date. Once operational, CIL will work alongside Section 106 obligations to support both strategic infrastructure and local priorities, with a proportion of receipts passed directly to town and parish councils to help deliver community-led improvements across West Oxfordshire.

Substantial progress is also being made on the Salt Cross Garden Village, which remains one of the district's most significant long-term growth areas. The Planning Inspector's final report on the Area Action Plan, including the revised Net Zero development policy, has now been received for fact-checking, with adoption expected at Full Council in February 2026. Work continues with Oxfordshire County Council and the developer to confirm the outstanding information needed for timely determination of the outline planning application, supported by an anticipated Planning Performance Agreement to establish clear timescales and resource commitments. Engagement with Eynsham Parish Council remains constructive, including review of its draft Neighbourhood Plan. Meanwhile, the Oxford Growth Commission has reaffirmed its support for the Garden Village as part of the national garden communities programme. Alongside planning work, the Council continues to explore opportunities for clean-growth employment and to collaborate with innovation partners to support low-carbon enterprise linked to the emerging development.

Following the close of the spatial options consultation in December 2025, work is now focused on preparing the Draft Regulation 19 Local Plan, which will set out a comprehensive policy framework for sustainable development, long-term stewardship and place-shaping across the district. Work on the Carterton Area Strategy is progressing in parallel, reflecting its close alignment with the Local Plan's vision for future growth. Early engagement has been positive, and the Oxford Growth Commission has endorsed the Council's approach. A dedicated officer will be appointed in early 2026 to lead work with residents and stakeholders, building a shared and ambitious long-term plan for Carterton to be in place by 2028. Alongside this, partnership work continues with the West Oxfordshire Business and Retail Park, Carter Jonas and local landowners to produce a focused investment prospectus and strengthen the town's economic offer, including development opportunities around the RAF Brize Norton main gate.

Walking, wheeling and cycling infrastructure projects continue to advance across the district. The Carterton LCWIP, formally adopted by Oxfordshire County Council in October 2025, provides a 10-year programme of improvements designed to increase active travel and support future funding bids. The Eynsham LCWIP is being refined following public consultation, incorporating proposals for upgraded crossing points, traffic-free routes and heritage-sensitive wayfinding. In Witney, plans to enhance the High Street and Market Square have progressed through statutory consultation, and subject to approval of final designs and associated traffic orders, construction is expected to begin in early 2026 and complete by mid-year. Supported by £1.98m from Active Travel England, the scheme aims to provide improved accessibility, planting, public spaces and traffic-calming.

A wide range of UK Shared Prosperity Fund (UKSPF) initiatives continue to deliver impact across the district's economy. The Wayfinding Signage Project is progressing in partnership with the Witney Chamber of Trade, while shopfront, rural enterprise, business boost and visitor economy grants remain on track to support more than 30 businesses by the end of Q4. Work continues with Marriotts Walk on enhancements to public realm and visitor experience, and officers are exploring opportunities to procure improved footfall data to strengthen the evidence base for town-centre decision-making. CBRE continues to support the management of retail units in a challenging market, with progress on new leases and ongoing design and costing work for further public realm improvements.

In housing, feasibility work has been undertaken with a range of modular construction providers, including timber-frame SIP and container-based manufacturers, though suitable sites have not yet been identified. Separately, 28 bedspaces are in the acquisition pipeline to meet high demand from single applicants on the housing register, with properties progressing through surveys, legal checks and contract preparation. At Woodford Way, partnership working with a Registered Provider remains the preferred delivery route, offering opportunities to leverage external funding and reduce financial exposure to the Council. Detailed design refinement continues, including parking arrangements aligned with the district's parking strategy, and commercial discussions with the RP and Homes England remain positive. However, the previous development partner has confirmed it cannot proceed with the proposed acquisition due to funding challenges. An Options Briefing Note will therefore be brought to Informal Executive in February 2026 to agree the best path forward and maintain momentum on delivery.

Creating a Better Environment for People and Wildlife



Actions we are taking

West Oxfordshire District Council has completed the Preferred Policy Options consultation for its emerging Local Plan 2041. Running from 26 June to 8 August 2025, this stage explored the updated vision, objectives and preferred approaches across housing, transport, climate, economy, infrastructure and the natural and historic environment. It did not propose site allocations but invited early views on the direction of travel, helping to build understanding of the key issues the Draft Plan will need to address. Engagement included online material, hard-copy documents and a programme of district-wide drop-in events and online sessions. A Consultation Summary Report was published in October 2025, setting out the themes raised and how they will inform the next stage of plan-making.

The Preferred Spatial Options consultation followed from 3 November to 22 December 2025, seeking views on the distribution of development, the settlement hierarchy and whether the plan period should extend to 2043 to ensure a full 15-year horizon. It revisited strategic sites including Salt Cross and West Eynsham and explored additional locations around towns and larger villages. This stage forms a bridge between early policy development and the forthcoming Draft Plan and is informed by the Preferred Options document published in June 2025. Preparation of the Regulation 19 Draft Local Plan is now underway, incorporating a strengthened, integrated approach to the water environment based on updated technical evidence.

Updating the evidence base remains a critical part of this work. Draft updated reports for the Level 1 Strategic Flood Risk Assessment and Phase 1 Water Cycle Study were issued in July 2025, assessing fluvial and surface water risk, water supply and wastewater capacity, and setting out principles for applying the Sequential and Exception Tests. These studies, aligned with national guidance, complement wider updates to Oxfordshire's Local Flood Risk Management Strategy and will underpin decisions about growth locations and infrastructure needs as the Draft Plan takes shape.

Nature recovery continues to be embedded across plan-making and delivery. The Pudlicote Farm habitat bank, established in March 2025 with the landowner and the Trust for Oxfordshire's Environment, remains a key mechanism for delivering Biodiversity Net Gain (BNG) where on-site delivery is not feasible. Baseline BNG calculations for five priority sites are also being reviewed to support future project development. Opportunities for strategic land acquisition will be considered once the BNG market stabilises and in the context of local government reorganisation. Officers continue to participate in the Evenlode and Windrush Catchment Partnerships, supporting nature-based interventions such as wetland creation and helping to connect landowners with technical expertise.

The Oxfordshire Local Nature Recovery Strategy (LNRS)—endorsed by West Oxfordshire's Executive in September 2025, and published in November 2025, identifies countywide habitat priorities and opportunity areas, with approximately 41% of West Oxfordshire falling within mapped opportunities. Officers and councillors attended the LNRS launch and the Oxfordshire Local Nature Partnership annual meeting, reflecting strong collaborative working with environmental partners. The LNRS is already informing delivery at a local level, including the Windrush in Witney project, where a February 2026 review meeting will consider future opportunities and help shape a planned National Lottery Heritage Fund bid in Year 3 of the Service Level Agreement.

Community-level nature initiatives continue to expand. The Coronation Community Orchard Scheme has supported six orchards in round one, sixteen in round two, and nine applications are progressing in the final round, with pruning workshops now scheduled. The Nature and Health Inequality project continues in partnership with local charities, councils and the University of Oxford, informed by updated Index of Multiple Deprivation 2025 data. Officers are also reviewing ecological reports with the Ecology Team and working with Assets, volunteer groups and Ubico to identify additional Road Verge Nature Reserves, with one verge already under revised management. At the Station Lane depot in Witney, an Environment Agency exemption application for composting is awaiting a March 2026 decision, and at the Woodgreen offices, glyphosate-free management has been strengthened by a move to peat-free practices. Broader woodland planting work remains on hold pending clarity arising from local government reorganisation.

As the Local Plan advances, the Council continues to align updated technical studies, the LNRS, BNG delivery work, catchment partnership activity and community-level initiatives to ensure a robust and environmentally led Regulation 19 Draft Plan for consultation in 2026, ahead of submission for independent examination.



Responding to the Climate and Ecological Emergency

Actions we are taking

West Oxfordshire District Council declared a Climate and Ecological Emergency in 2019 and remains committed to achieving carbon-neutral operations by 2030. This ambition is guided by the Climate Change Strategy 2025–2030, the Carbon Action Plan 2024–2030 and the West Oxfordshire Nature Recovery Plan, which together set a clear framework for cutting emissions, integrating climate considerations into Council services and strengthening biodiversity and climate resilience.

Progress continues on decarbonising the Council's estate. Heat-decarbonisation plans have been completed for Elmfield, 3 Welch Way and the Old Court House. At Windrush Leisure Centre, the PSDS Phase 3c scheme has advanced significantly, with the new air-source heat pump system installed and the asbestos boiler removed; completion remains on track for March 2026. The PSDS Phase 4 scheme for Chipping Norton Leisure Centre is still under review, and new funding will be required to decarbonise Carterton Leisure Centre following the unsuccessful PSDS Phase 3b bid. Solar PV has been installed at Carterton, although further upgrades will be needed to reduce emissions. Budget provision has been identified for low-carbon heating and solar PV at 3 Welch Way in 2026/27, while the Senior Leadership Team has confirmed no wider solar investment on Council properties ahead of Local Government Reorganisation.

The district's electric vehicle charging network continues to expand through Council-owned sites and the countywide OXLEVI programme. Oxfordshire secured £3.6 million in LEVI funding to triple public EV charging by the end of 2025, supported by procurement completed in 2025. Legal contract documents for the countywide rollout are prepared, with approval anticipated in January 2026. A connection surgery is scheduled for 28 January 2026 to assess depot electrical capacity for fleet electrification.

Work to align waste and fleet operations with the Council's climate goals also continues. The Waste Environmental Services Programme (WESP) business case is being updated to reflect infrastructure needs such as depot decarbonisation and EV charging. A fleet review has been completed and procurement is underway for four new electric food-waste vehicles, with broader electrification planned as vehicles reach replacement. The Sustainability Impact Assessment Tool (SIAT) is now mandatory for all Council decisions.

The Council remains an active partner in CAPZero—the community-led energy plan around the Eynsham (Cuckoo Lane) primary substation—and discussions continue with Low Carbon Hub on districtwide application. Oxfordshire's Local Area Energy Plan (LAEP) modelling has identified significant solar and wind potential, and the district LAEP will assess how these opportunities can be delivered for maximum community benefit. Countywide retrofit planning is being advanced through Arup's work for Oxfordshire County Council, supporting local efforts to scale retrofit. The Council continues to promote ESOX energy assessments for businesses and uses the Greenlight hub to support community climate action, funding signposting and engagement with town and parish councils. Work is also underway to strengthen youth climate networks.

The Council is preparing to enforce Minimum Energy Efficiency Standards (MEES) more strongly in the private rented sector, with reported breaches to be investigated. Funding secured through a 2025 report is enabling development of a new Asset Management Strategy, including carbon assessments of tenanted buildings.

Support for low-income and off-gas households continues through HUG2 (Home Upgrade Grant Phase 2), which upgraded 15 homes in Year 1 and now benefits from expanded eligibility. This complements services offered through Better Housing Better Health, ensuring support reaches households least able to invest in upgrades themselves.

Delivery of the West Oxfordshire Nature Recovery Plan continues, with actions prioritised according to capacity and impact. The Ecology Team has returned to full staffing (3 FTE planning ecologists and 2 FTE nature recovery officers), enabling stronger project delivery. A full update will be presented to Overview & Scrutiny in February 2026, and Executive Members are considering budget provision for new and multi-year nature recovery projects in 2026–27. Officers remain engaged with county and regional partners on mitigation and adaptation.

A countywide energy baseline and modelling exercise is nearing completion, and the district LAEP will guide future energy infrastructure decisions. Work on Local Plan energy policies is being strengthened ahead of Regulation 19 to ensure alignment with the Oxfordshire Climate Adaptation Route Map and wider strategies.

In June 2025, West Oxfordshire was named the top-performing rural district in the national Council Climate Action Scorecards, recognising strong governance, community engagement and practical progress across areas including decarbonisation, retrofit, nature recovery and carbon-literacy training.



Working Together for West Oxfordshire

Actions we are taking

West Oxfordshire District Council is entering the final year of UK Shared Prosperity Fund (UKSPF) and Rural England Prosperity Fund (REPF) delivery, with a clear focus on ensuring continuity for communities and businesses as national funding winds down. Final allocations for 2025/26 have been confirmed as £327,146 (UKSPF) and £214,829 (REPF), extending the district's overall Prosperity Fund programme into a fourth year and supporting local investment through March 2026. In December 2025, the Government announced an extension to the national programme, allowing expenditure until October 2026. This provides additional flexibility to manage any underspend and work collaboratively with the Delivery Group and Partnership Group ahead of the new hard stop deadline. A celebratory event is being planned to recognise the achievements of UKSPF and REPF participants and highlight the positive impact created across the district.

A strengthened programme of business support schemes has been launched to help local enterprises innovate, grow and future-proof their operations. This includes the new West Oxfordshire Business Boost Grant, offering up to £5,000 in capital funding for equipment, expansion and low-carbon investment, opening formally in September 2025. It complements existing schemes such as Shop Front Improvement Grants (up to £1,000), Visitor Economy Grants (£1,000–£10,000) and Rural Enterprise Growth Grants (£5,000–£20,000), all refreshed in June 2025. Six-month impact reporting for the 2025 rounds begins in October. Business and environmental sustainability support continues through the Carbon Action Fund, which has seen strong uptake, and the Tools for Tomorrow initiative, which continues to address skills shortages in the construction and retrofit sector. Wider support also includes delivery of the West Oxfordshire Business Support Programme (June 2025–January 2026), offering Business Sparks and Business Accelerator provision for start-ups and scaling businesses.

The Westhive civic crowdfunding programme continues to act as a flagship for community-led investment. By the end of Round 4 (July 2025), the platform had supported 28 projects worth £948,172. A further Round 5 has since been completed, with 10 additional projects receiving pledges. The Council has also invested an additional £60,000 in the Westhive Community Infrastructure Fund to support projects focused on youth engagement, inclusion and mental health. In 2024/25 alone, £273,682 in UKSPF support was channelled into VCS projects through Westhive. Recent Westhive-supported initiatives include:

- **Let's Roll!** - inclusive wheelchair dance classes, now fully funded for continued delivery and hosting a national competition in 2026.
- **Carterton Family Centre** - receiving funding to expand low-cost provision for young families.
- **Community Floodplain Restoration** - creating new meadows and wet woodland to boost biodiversity and natural flood management.

Youth-focused work continues to expand. The Council's Youth Development Officer has supported emerging youth-led projects in Stonesfield, Freeland and Eynsham, while a new Youth Partnership with Witney Town Council and Thames Valley Police focuses on inclusion and safeguarding. The YouMove programme now supports more than 500 families in West Oxfordshire and has seen a significant rise in activity levels countywide, with nearly 14,000 residents registered by mid-2025. The Leisure Cards scheme, delivered through GLL, also continues to offer free leisure access for residents experiencing poor mental health.

Engagement with the Voluntary and Community Sector (VCS) remains strong, supported through forums in key settlements and biannual Health and Wellbeing Alliance meetings. New initiatives include the recruitment of a Food Action Plan Officer to deliver the district's Food Action Plan, and the launch of the Community Activity Grant (CAG) scheme, providing £500–£1,000 for small community action projects, with decisions due in October 2025. The Community Insight Profile Grant Scheme, funded by Oxfordshire County Council Public Health, will support organisations in Witney Central, with awards expected in November.

Business and environmental sustainability support continues through the Carbon Action Fund, which has seen strong uptake and has been submitted for consideration in the LGC Awards. This fund, worth £10,000–£20,000 per grant, targets SMEs seeking to decarbonise buildings, install renewables, or invest in waste-reduction equipment. The Tools for Tomorrow initiative also remains active, addressing skills shortages in the local construction and retrofit sector. [news.westoxon.gov.uk] Wider economic development initiatives include the West Oxfordshire Business Support Programme (June 2025–January 2026), delivered by ALP Synergy, offering a combined cycle of Business Sparks and Business Accelerator support for start-ups and scaling firms. The district continues to promote enterprise and innovation through workshops, peer-to-peer networks and tourism-sector support via Cotswold Tourism partnerships.

Together, these programmes and investments reflect the Council's commitment to sustaining the impact of the Prosperity Funds beyond their national end date, strengthening community resilience, supporting business growth, and ensuring that local priorities continue to be delivered through 2026 and beyond.

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Corporate Strategy Action Tracker

Green	On target
Amber	Off target but action being taken to ensure delivery (where this results in a reviewed target date, this is made clear in the table)
Red	Off target and no action has yet been agreed to resolve the situation
In Progress	Work on the action is underway, though a fixed timeline has not yet been set.
Complete	Action completed
Not Scheduled to Start	The action/project has either a future start date or is still in its early stages, with no start date established yet.

		Our Focus	Actions	Quarter 3 Update	Start Date	Date Due	Status	Executive Member	Link Officer
I.1	Putting Residents First	The Council will listen and act in the best interests of residents by: -Being an outward facing, accessible, inclusive and open Council, improving our use of technology to increase understanding and access to what we do, how we work and the decisions we take -Providing easy to use platforms for public consultations that are effective, accessible and timely so that the voice of residents can be heard in planning and other Council decisions	Explore how the Council leads Youth Engagement, ensuring youth are engaged across the wide range of activity it undertakes.	Youth Development officer has continued to strengthen engagement with youth organisations in order to reach young people and continued to engage with other Council services including Planning Policy and Economic Development			On Target	Rachel Crouch	Heather McCulloch
		-Positively engaging with and listening to locally elected representatives on Town and Parish Councils -Actively seeking the voice of the seldom heard, including those of young people, to understand their particular needs and ensure that the Council is taking decisions that meet these needs.	Customer Experience Improvement Programme	Completed	01/07/2020	01/01/2024	Complete	Andy Graham	Giles Hughes

1.2	Putting Residents, Young and Old, at the Heart of What We Do	The Council will act with outstanding levels of transparency and accountability, with high standards of governance and trustworthiness.	<p>Proposal to implement a robust system and process for:</p> <ul style="list-style-type: none"> > the allocation of matters to the councils' forward plans > report preparation, consultation and approval > transparency and publication of decision making; and > decision tracking. 	Completed	01/05/2021	31/12/2023	Complete	Andy Graham	Giles Hughes
1.3		The Council will actively manage Council budgets, delivering good levels of service through the wise and efficient use of funds available as well as enabling those budgets to grow so that the Council can take action towards the priorities of this Council Plan.	Procurement: Publica-wide project to embed climate, ecological and social value considerations in procurement processes to maximise the use of sustainable suppliers and support local businesses.	Procurement Act Training was delivered in November. Toolkit training will now be rolled out in February, however, the toolkit is available on the Portal and provides an intuitive step by step guide.			In Progress	Alaric Smith	Ciaran O'Kane / Claire Locke
		Ensure the timely provision of built and green infrastructure which meets the needs of existing and incoming residents and that supports health and care to enable physical and mental well-being, community cohesion and delivers a high quality of life.	Adopt and implement CIL (Community Infrastructure Levy).	Preparation has continued ahead of the effective commencement date of 31 January 2026 including Officer training, development of back office systems etc.	01/11/2019	31/08/2024	Off Target but Mitigation in Place	Hugo Ashton	Giles Hughes / Chris Hargraves
			Commission (Sport England) Strategic Outcomes Planning Model (SOPM) through Max Associates to inform a West Oxfordshire Leisure, Health and Wellbeing Strategy which will define a more holistic leisure provision offer (inc. arts, culture, entertainment and sport). The SOPM will also inform the Infrastructure Delivery Plan (and Local Plan Review) and Town Centre regeneration plans.		Completed	01/09/2023	20/11/2024	Complete	Tim Sumner

2.1	Enabling a Good Quality of Life for All	Explore opportunities for green investment for strategic development areas eg through the Carterton Masterplan and also through the Pan-Regional Partnership.	Our UKSPF partnership with Low Carbon Hub is supporting ongoing infrastructure investments for businesses aiming to become more climate-conscious, with this phase concluding in Q4. We are focused on exploring strategic employment sites at Salt Cross and collaborating with local science-based innovation centres to drive this growth. Additionally, we are working with West Oxfordshire Business and Retail Park in Carterton to create new opportunities for green investment through a dedicated prospectus that promotes Carterton as a prime location for business.	01/01/2023	31/08/2025	On Target	Tim Sumner, Andrew Prosser	Sam Stronach		
		Explore how the Local Plan can address the issue of securing long term maintenance of green infrastructure on large SDAs.	Draft Regulation 19 Local Plan in preparation following conclusion of spatial options consultation on 22 December 2025. This will include consideration of long-term maintenance and stewardship arrangements in new development.	31/08/2022	31/08/2025	On Target	Andrew Prosser	Chris Hargraves		
		Consideration of community stewardship and maintenance of Strategic Development Areas – how do we enable this?	Draft Regulation 19 Local Plan in preparation following conclusion of spatial options consultation on 22 December 2025. This will include consideration of long-term maintenance and stewardship arrangements in new development.	31/08/2022	31/08/2025	On Target	Andrew Prosser	Chris Hargraves		
2.2		Work with Oxfordshire County Council and others to increase the opportunity for residents to travel around and beyond the District on foot or by bike, or on public transport, to reduce car dependence and benefit from the health and economic benefits of doing so.	Carterton Local Cycling and Walking and Infrastructure Plan (LCWIP) has been formally adopted by OCC. Eynsham LCWIP is being progressed.	10/09/2021		In Progress	Andrew Prosser	Hannah Kenyon		
		Explore the scope for alternative means of delivering the range of homes in the District that meet the diverse needs of our communities, such as investment in tenures and sizes of homes that the market does not currently deliver enough of	Strategic Housing Project: Internal management and modelling – proposals to be presented to Executive in paper compiled by Publica Assistant Director Planning and Sustainability to November Executive.		Completed	01/04/2023	15/11/2023	Complete	Geoff Saul	Giles Hughes

2.3

The Council will be a hive of activity to help build and support

deliver enough of.

Strategic Housing Project: Assessing scope for investment and modelling.	Initial assessment shows that partnership working with an RP offers the potential to leverage funding and Homes England grant, whilst de-risking financial exposure for the Council. Live example at Woodford Way currently being progressed.	01/04/2023		On Target	Alaric Smith, Geoff Saul	Giles Hughes
Strategic Housing Project: Overview of modelling options and delivery. Proposed approach to the November Executive.	Completed	01/04/2023	15/11/2023	Complete	Tim Sumner, Geoff Saul	Giles Hughes
Further exploration of the best route to be more interventionist in housing delivery via direct provision – clarity needed over the desired objectives of establishing the council owned housing company or pursue an alternative route eg via a Joint Venture (OxPlace/Oxfordshire wide).	Routes to direct Council Intervention have been explored and a Council Owned company has been discounted. Alternative routes such as Joint Venture, Land trading, Profit share and commissioning models are more favourable. A recent example is partnership working with an RP to appraise, commission and develop a Council land asset at Woodford Way. This approach protects the Councils interests, offers protection from financial and resource risk, and it also provides clarity on the desired outcome.	01/04/2023		On Target	Geoff Saul	Giles Hughes
Development of business cases for existing Council owned sites – initial focus should be on Woodford Way – a housing scheme which integrates carparking (what is needed/tie in with EVPC). Key landowners/development partners.	The proposals for Woodford Way will be taken to the Executive committee on the 14th Jan. An architect has been engaged to refine the existing block plan into a comprehensive plan which integrates sufficient car parking, residential development and appropriate amenities and landscaping. A working group of planners, conservation and the RP are all collaborating to arrive at the most beneficial design. The proposed parking solution includes the car parking capacity available at the Mariotts multi-storey car park in close proximity to the site. The recent car parking strategy makes this position clear, but further work is being done to quantify this. Commercial considerations are looking positive but are being confirmed with the RP and Homes England.	01/04/2023		On Target	Geoff Saul	Michael David
Further exploration of modular building – how, where and with whom including visits manufacturers. To understand options for delivery.	Modular Building companies have been researched (including Timber frame SIPs and container homes) however appropriate sites have not yet been identified.	01/04/2023		On Target	Geoff Saul	Giles Hughes
Emergency accommodation – Acquisition of - consider the balance – single/couple and family accommodation).	A total of 28 bedspaces have been identified in the pipeline for acquisition. These are predominantly to meet the needs of single persons which is the overriding demand from the housing register. Each property transaction is at varying stages of surveys, legal work in preparation for completion and exchange of contracts.			In Progress	Geoff Saul	Jon Dearing

	thriving towns and villages that provide residents with a high quality of life by supporting a vibrant local economy, homes and infrastructure that meet people's needs, excellent health and wellbeing and ensuring equal access to opportunity for all.	Work with partners to support a vibrant local economy which gives residents the opportunity to prosper and fulfil their ambitions through secure jobs and exciting careers, entrepreneurship and developing new skills to participate in and contribute to the local economy.	Completion of housing development at Walterbush Road, Chipping Norton.	Longstop date for development partner extended to 1st December 2025. Development partner has now confirmed that the sale to them is unlikely to proceed due to inability to secure funding. Options Briefing Note to be brought forward to Informal Executive 11th February 2026.	01/10/2021	31/07/2023	Off Target but Mitigation in Place	Geoff Saul	Jasmine McWilliams
			Deliver the Local Authority Housing Fund as a means to relieve pressures on short term accommodation and bridging hotels with a longer term of objective to see the housing being used for more general affordable purposes.	Completed	01/04/2023	31/09/2024	Complete	Geoff Saul	Jon Dearing
2.4		Work with partners to support a vibrant local economy which gives residents the opportunity to prosper and fulfil their ambitions through secure jobs and exciting careers, entrepreneurship and developing new skills to participate in and contribute to the local economy.	Work with Carterton Town Council and other relevant stakeholders to identify economic regeneration priorities for the town and immediate area following completion of the UKSPF funded Carterton Strategic/Master Plan.	<p>Carterton Area Strategy work now underway. Strong inter-relationship with draft Local Plan 2043. The council is appointing a dedicated specialist, who will take up their post in the New Year 2026, to work closely with the community on the Carterton Area Strategic Plan, setting out a clear and shared vision for the areas future, ensuring that growth and development reflect local priorities with the goal of having a comprehensive plan in place by 2028.</p> <p>As part of the early groundwork, the council has already engaged with the Oxford Growth Commission, who have reviewed and endorsed the approach. Previous studies and reports highlight the strong potential for Carterton and this initiative will translate that potential into meaningful outcomes for residents and businesses.</p>			In Progress	Duncan Enright	Chris Hargraves
			Strategy and plan for reinvigorating the District's Charter Markets	Completed			Complete	Duncan Enright	Sam Stronach
			Set future project priorities for Council and Stakeholders to secure the long term viability of our Market Towns via enhancements inc wayfinding & signage, public realm and support for independent retailers and appropriate market promotions/attractions.	<p>We continue to make progress on the Wayfinding Signage Project, working closely with the Witney Chamber of Trade. Our UKSPF Shop Front Improvement Grant remains on track to award 14 grants by the end of Q4. In addition, the Rural Enterprise Growth Grant and the West Oxfordshire Business Boost are set to provide a further 11 grants to local businesses, while the Tourism Team's Visitor Economy Grant scheme aims to support up to 8 businesses.</p> <p>We are currently collaborating with the Assets Team and Marriotts Walk Shopping Centre on a public realm improvement project. Our Business Matters newsletter continues to champion local retailers, sharing up-to-date and relevant information. We also maintain our commitment to visiting businesses to offer tailored support whenever needed. We are exploring options to source a comprehensive footfall data package to support high street vitality and inform decision-making. This data will help us better understand visitor patterns, peak times, and overall trends, enabling targeted interventions to boost local business performance and enhance the customer experience.</p>	01/12/2022	31/05/2025	On Target	Duncan Enright	Sam Stronach

			Oxfordshire County Council improvements to Witney Town Centre linked to Marriotts Walk redevelopment where appropriate.	Subject to approval, the final design will be published, traffic orders made, and construction is expected to start in early 2026. With completion mid-2026			Off Target but Mitigation in Place	Duncan Enright	Sam Stronach
2.5			Guide the future delivery of Salt Cross new garden village and associated infrastructure to enable delivery of Salt Cross Science Park.	Area Action Plan - Planning Inspector's final report regarding Net Zero received for Fact Checking. Anticipation of adoption at Full Council 25th February 2026. Outline Planning application 2021 reviewed with OCC / GDL; in the process of agreeing requirements for outstanding information / updated information required to enable a work programme to be fixed / resources allocated & PPA put in place with the objective of timely outline planning determination. Liaison with Eynsham Parish Council & receipt of draft Neighbourhood Plan for review. Receipt of Oxford Growth Commission Interim report supportive of Salt Cross within the garden community programme.	01/01/2018	31/12/2034	Off Target but Mitigation in Place	Duncan Enright	Andrea Clenton
			Marriotts Walk – implementation of CBRE recommendations inc. securing new tenants, public realm improvements & making enhanced use of the square.	Work ongoing with CBRE to manage void units in a challenging market. Unit 6 Agreement for Lease completed and planning permission granted, landlord fitout due to be completed January 2026 with completion of lease thereafter. Lease of Unit 14a due to complete February 2026 and terms agreed to retain tenant at Unit 11a. Public Realm designs and costings in train.			On Target	Duncan Enright	Jasmine McWilliams
			Development of the Carterton Strategic/Master Plan to regeneration the town and in doing so redressing balance between housing development with investment in the town centre, leisure and culture facilities, community space and business opportunities. Will seek to determine the best way to maximise the economic benefit of the RAF's largest airbase for the town and immediate area.	We are working closely with the owners of West Oxfordshire Business and Retail Park and Carter Jonas to develop an investment brochure that highlights the park as an attractive location for businesses. As part of this initiative, we are providing key data and insights to strengthen the case for investment. Our aim is to continue supporting efforts to let vacant units near the RAF Brize Norton Main Gate, helping to drive economic activity in the area. In addition, we are exploring opportunities to collaborate on nominating Carterton for the Town of Culture of the Year competition, showcasing its unique character and community strengths. We are also partnering with Enterprise Oxfordshire to deliver a tailored business support and mentoring package for Carterton High Street businesses, ensuring they have the tools and guidance needed to thrive.	01/02/2022	31/05/2025	Off Target but Mitigation in Place	Alaric Smith, Hugo Ashton, Geoff Saul, Tim Sumner	Sam Stronach
	Work with others, and fulfil our statutory obligations, to ensure that land, air and water support biodiverse habitats, reduce pollution and bring about nature recovery to the District, putting it at the forefront of local decision making.	Ubico Grounds Maintenance Contract – review contract with aim of securing both biodiversity enhancements and budgetary savings.	Ongoing work in relation to composting facility at Station Lane depot in Witney; exemption application has been submitted to Environment Agency and expecting outcome by March 2026. As well as no glyphosate use at Woodgreen offices, it has also been agreed that the site will be peat-free. Investigating the potential to identify additional Road Verge Nature Reserves through a change of management regime.	01/04/2025	01/03/2026	On Target	Lidia Arciszewska	Si Pocock-Cluley	

3.1	Creating a Better Environment for People and Wildlife	<p>Biodiversity Land Management Plans - Working with Ubico to change land management processes across key WODC sites, for example reduced mowing frequency, creation of urban meadows, changes to floodplain meadow management, invasive species action, subsidence works, to improve them for both wildlife and people.</p>	<p>Ecological reports are under review with the Ecology team and proposed future changes will be discussed with Assets, local volunteer groups and Ubico. The management of additional Road Verge Nature Reserves is under discussion, with one already managed in-house.</p>	01/02/2022	01/03/2026	On Target	Lidia Arciszewska	Si Pocock-Cluley / Hannah Kenyon / Melanie Dodd
		<p>Support DEFRA funded Landscape Recovery Project (contiguous with the Evenlode and Windrush Catchments) in partnership with the North East Cotswolds Farmer Cluster and the Oxfordshire Local Nature Partnership.</p>	<p>Awaiting the outcome of the grant application. Evenlode Catchment Partnership steering group and wider group meetings attended where this project was discussed.</p>			In Progress	Lidia Arciszewska	Chris Hargraves
		<p>Windrush in Witney funding bid, in partnership with Wychwood Forest Trust - Landscape-scale enhancements across the Witney Floodplains, working with OCC, WTC and Wychwood Forest Trust to introduce grazing, improve floral diversity, pollard willow trees, establishment of a new volunteer group and delivery of a series of community engagement/rural skills training events.</p>	<p>New Service Level Agreement objectives agreed for Year 2 between WODC case officer (Principal Ecologist), Community Funding Officer and WFT CEO to hold a Windrush in Witney project team meeting before the end of March 2026 to review the project and identify amendments and new opportunities, particularly in light of the LNRS. This meeting is scheduled to take place in February 2026. This will involve new partners such as the Windrush Catchment Partnership. The aim is to submit the development bid to National Lottery Heritage Fund in Year 3 of the SLA (2027-28) before local government reorganisation is underway.</p>	01/05/2022	01/03/2025	Off Target but Mitigation in Place	Andrew Prosser	Melanie Dodd
		<p>Coronation Community Orchard Scheme</p>	<p>6 orchards were planted in the first round. 16 in the second round. There are 9 applications for the third and final round, each in varying stages of completion. Comms on the pruning workshop have been shared, with set dates now fixed. Contingency plan remains in place to use any remaining funding.</p>	01/11/2023	21/03/2025	On Target	Andrew Prosser/Lidia Arciszewska	Melanie Dodd

3.2	The Council will be a progressive custodian of our environmental resources, supporting a healthy natural landscape and functioning ecosystem which is rich in wildlife and habitats that are enjoyed by and benefit	Recognise and support the vital role of farming in natural ecosystem conservation, local food production and economic resilience, and the role that environmentally sustainable farming can play in achieving this.	Engaging with farmers as part of a wider consideration of the District's rural economy. How can WODC work to support (within its powers) a strong local rural economy, including diversification and the visitor economy.	LGR has made it difficult for WODC to invest in woodland planting schemes at this point.			In Progress	Lidia Arciszewska, Andrew Prosser	Chris Jackson / Hannah Kenyon	
3.3		Help people to connect with nature by improving understanding of and public access to green spaces and the countryside.	Deer Park South Access Project – Infrastructure improvements to enhance public access to woodland adjacent to strategic development area.	Completed	01/12/2022	31/05/2025	Complete	Duncan Enright	Hannah Kenyon	
			Tackling inequalities in nature	Nature and Health Inequality project is continuing. Officers are continuing to work with local charities and councils, County Council and University of Oxford researchers. Work has been focussed following the release of the Index of Multiple Deprivation 2025 data. Forecasting and scheduling for the rest of the 3 year project is underway.				On Target	Andrew Prosser	Heather McCulloch / Melanie Dodd
3.4		Be an active participant in the Oxfordshire Local Nature Partnership and contribute to the production of the Local Nature Recovery Strategy to establish priorities and map proposals for action to drive nature's recovery, achieve Biodiversity Net Gain and provide wider environmental benefits specific to West Oxfordshire.	Officer group to convene with Local Nature Partnership - maintain relationship with LNP and work with partners to develop workstreams.	LNRS launch event and OLNP annual meeting was attended by several WODC officers and Cllrs. Ongoing good working relationship with the LNP.	01/07/2022	01/07/2025	On Target	Lidia Arciszewska, Duncan Enright	Hannah Kenyon / Melanie Dodd	
			Explore the potential for the Council to acquire land for Biodiversity Net Gain and nature-based carbon sequestration.	Baseline BNG calculations for the 5 priority sites are being reviewed. The acquisition of land for BNG and nature recovery could be considered after LGR once the BNG market has stabilised (after recent policy changes) and potential investment sources identified.	8/12/2024	31/03/2026	On Target	Andrew Prosser	Hannah Kenyon / Melanie Dodd	

3.5	all.	Work with others to facilitate environmentally sensitive flood management of our river catchments.	Support of the Catchment Partnerships including the promotion (where appropriate) of other water quality campaigning groups. Sewerage and Water Agency Group continue to facilitate (Links with the Pan Regional Partnership – Scoping and Modelling Work).	Officers sit on the Evenlode Catchment Partnership steering group and attend the quarterly meetings and support the partnership through the SLA. Officers also attend the Windrush Catchment Partnership quarterly meetings. Promotion of Wetland Creation Scheme through the Climate Action Bulletin and through personal introductions. Connecting farmers and landowners to the relevant catchment partnership coordinators continues and support is offered for site visits.			On Target	Lidia Arciszewska, Andy Graham	Hannah Kenyon / Melanie Dodd
			Delivery of the Local Plan – overview including how can the site allocations process through the Local Plan review play a positive role in water management? Coordination of policy. Linked to 4.2.	Draft Regulation 19 Local Plan in preparation following conclusion of spatial options consultation on 22 December 2025. This will include consideration of an integrated approach to the water environment.	01/06/2022	31/12/2024	On Target	Hugo Ashton	Chris Hargraves / Hannah Kenyon
		Drive down carbon emissions from Council operations including leisure, waste and street cleansing and running of the Council's estate, and in so doing lead by example to inspire others to take action to collectively reduce the overall carbon emissions of the District.	Decarbonisation of council owned buildings, including leisure centres and sports pavilions – secure external PSDS funding and extend the MEES project to include the full decarbonisation of tenanted buildings.	PSDS 3c Windrush Leisure Centre - New heating system has been installed. Asbestos boiler has been removed.			On Target	Andrew Prosser, Dan Levy, Alaric Smith	Hannah Kenyon
			Decarbonisation of council owned buildings, including leisure centres and sports pavilions – secure external PSDS funding and extend the MEES project to include the full decarbonisation of tenanted buildings.	PSDS 4 Chipping Norton Leisure Centre - Scheme is currently under review.			Off Target	Andrew Prosser, Dan Levy, Alaric Smith	Hannah Kenyon

4.1	Responding to the Climate and Ecological Emergency	<p>PSDS 3b funded Carterton Leisure Centre decarbonisation - Carbon reduction through the replacement of the heating and hot water system of the building with a low-carbon alternative and increasing the amount of solar PV on site.</p>	<p>PSDS 3b Carterton Leisure Centre - New funding will need to be identified and secured to decarbonise the centre.</p>	31/10/22	31/03/25	Off Target	Andrew Prosser, Tim Sumner	Hannah Kenyon
		<p>Waste Vehicle Strategy - Supporting the Waste team on the development of the strategy to reduce emissions from the Council's waste vehicle fleet.</p>	<p>Connection surgery scheduled for 28th January 2026 to identify depot capacity for charging electric vehicles.</p>			On Target	Lidia Arciszewska	Si Pocock-Clulely / Hannah Kenyon
		<p>Carbon Action Plan to 2030 and Climate Change Strategy to 2050 - Update of the Carbon Action Plan and Climate Change strategy to include scope 3 emissions, district carbon budgets, route maps to net zero, and actions.</p>	Completed	01/07/23	30/6/2024	Complete	Andrew Prosser	Hannah Kenyon
		<p>Climate Impact Assessment Tool (CIAT) – Develop the tool as a mandatory requirement on projects so as to embed climate and nature considerations in council decision making.</p>	Completed	01/02/2023	01/04/2024	Complete	Andrew Prosser	Hannah Kenyon
		<p>Solar PV project for tenanted buildings - A Publica-wide long-term project to install rooftop solar panels on council owned buildings, increasing the amount of renewable energy generated in the District.</p>	<p>SLT has confirmed there is no appetite for solar investment in council-owned properties pre-LGR.</p>	01/08/2022	01/12/2023	Off Target	Andrew Prosser	Hannah Kenyon

4.2	The Council will be a community leader in responding to the challenges of climate change, including rapidly reducing greenhouse gas emissions and preparing the District and its communities for the impacts of climate change to ensure a fair transition for all to a future that will be defined by climate change.	Encourage the use of nature based solutions to sequester carbon and combat the risks arising from climate change at a river catchment scale, such as restoration of meadows and trees to reduce flooding and improve water quality.	Biodiversity Action Plan – Develop and deliver workstreams to restore nature and enhanced biodiversity in the District.	The Nature Recovery Plan continues to be implemented on a priority basis. Completed actions include the Ecology team, which is now back up to capacity with 3 FTE planning ecologists and 2 FTE nature recovery officers. Full progress report being provided to O&S committee meeting on 4th February 2026 (report in prep.). Possible budget for additional nature recovery projects being considered by Exec for 2026-27 (some of these will be multiple year projects).	01/03/2023		On Target	Andrew Prosser	Hannah Kenyon / Melanie Dodd
4.3		Work with partner organisations and residents to facilitate the retrofit of carbon reduction measures in homes and businesses and pursue a drive to net zero carbon buildings in new developments through planning policy	Consider how proactive should WODC be in facilitating retrofit for the 'able to pay' market.	In discussions with Low Carbon Hub about the CAPZero model and districtwide rollout. LAEP is considering how to retrofit at scale. Arup have been commissioned by OCC to develop a retrofit action plan.			In Progress	Andrew Prosser	Hannah Kenyon
			Greenlight – nature and online hub to facilitate community action for a greener future.	Continue to engage with a range of stakeholders on climate mitigation and adaptation.			In Progress	Andrew Prosser	Hannah Kenyon
			Minimum Energy Efficiency Standards (MEES) project for tenanted buildings - A Publica-wide review of tenanted buildings to determine what measures are needed to bring the EPC rating up to a B or above by 2030.	Reported breaches of MEES for privately rented homes will be investigated and enforced.	01/07/2023		On Target	Andrew Prosser	Hannah Kenyon
			Home Upgrade Grant Phase 2 (HUG2) - A countywide scheme to upgrade energy efficiency and low carbon heating for low-income householders in the worst performing off-gas grid homes.	Completed	01/06/2023	01/03/2025	Complete	Andrew Prosser	Hannah Kenyon
4.4		Encourage renewable energy generation at appropriate sites in the District, improving local energy and economic resilience and supporting the community benefits that this resilience will bring.	Explore opportunities with partners to encourage renewable energy within the District.	Local Area Energy Plan (LAEP) countywide modelling has identified the potential for solar and wind power and this is being considered in more depth as part of the district LAEP. Exploring different community models for renewable energy to understand how best to support schemes that maximise community benefits. Supporting a community benefit policy for renewable schemes.			On Target	Andrew Prosser	Giles Hughes / Hannah Kenyon

4.5		Work with Oxfordshire County Council to deliver on our joint commitment to active travel and public transport, including through improved walking, cycling and public transport infrastructure and better public transport services.	Install EV charging points across the District.	Legal contract documents have been prepared. Contract approval is anticipated in January 2026 and contract entered into with the preferred supplier shortly afterwards.	26/05/2023	01/01/2025	Off Target but Mitigation in Place	Andrew Prosser	Hannah Kenyon
5.1	Working Together for West Oxfordshire	Target available Council grant budgets to proposals by other organisations that will deliver on Council priorities.	Enable delivery of agreed project interventions on Government approved Investment Plan under UKSPF and REPF.	We continue to make steady progress across all UKSPF and REPF programmes, with grant agreements on track to conclude by Q4 2026. In December 2025, the government announced an extension for UKSPF/REPF funding, allowing expenditure up until October 2026. This provides additional time to address any underspend identified and work collaboratively with our Delivery Group and Partnership Group to allocate remaining funds before the new hard stop deadline. In addition, we are planning a celebratory event to recognise and showcase the achievements of all UKSPF and REPF participants, highlighting the positive impact these programmes have had on businesses and communities.			On Target	Duncan Enright	Sam Stronach
		Successful implementation of new Grant Scheme: a) Crowdfunding, b) Community and Voluntary Sector Service Level Agreements and c) Youth initiatives.	a) Round 5 has been completed with a further 10 projects being offered funding from the Council. Approval has been given by Executive to continue with this funding scheme over a further 3 years from April 2026. b) SLA organisations continue to operate. Funding for a new 3 year programme has been agreed from 2027 onwards c) Youth opportunities continue to be developed working in partnership with a range of providers and services	01/12/2022	31/05/2025	On Target	Alaric Smith with Rachel Crouch, Andrew Prosser and Lidia Arciszewsk	Heather McCulloch	
5.3		Support Town and Parish Councils to represent their communities energetically and take action on issues important to their locality.	Towns and Parish Biodiversity project– UKSPF funded project to provide case studies for communities on how to enhance biodiversity in different habitats.	Completed	01/12/2022	31/05/2025	Complete	Andrew Prosser	Hannah Kenyon

5.4		Support the Voluntary and Community Sector to continue to undertake activity which serves the needs of residents including established organisations and more informal groups working to address particular needs such as access to food, youth support and cultural provision.	Community Grants	Ongoing engagement with VCS. Food officer recruited - due to start in Jan 2026. Witney Community insight Profile Grant round approved 22 projects to benefit the area.	01/12/2022	31/05/2025	On Target	Rachel Crouch	Heather McCulloch
5.5		Make a dedicated effort to further understand and meet the needs of our young people and support their mental health, including children, teenagers and young adults leaving school, entering the world of work and/or seeking to set up home in the District.	Focussed programme of engagement with young people, and other groups, on mental and physical health, local facilities and spaces for young people, to ensure future leisure, sport, culture and arts provision in the District best provides for these.	Youth development officer continues to engage with youth organisations across the district as well as interested groups in areas where services for young people are very limited. These have included sports clubs and private schools in the last quarter. OCC announced DCMS Local Transformation Pilot funding coming to WODC to develop a number of initiatives.			In Progress	Rachel Crouch, Tim Sumner	Heather McCulloch
			Have Your Say Events – focussed topic event for young people.	No plans for a one-off Have your say event at this stage.			In Progress	Rachel Crouch	Heather McCulloch

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WEST OXFORDSHIRE
DISTRICT COUNCIL

Delivering great services locally

PERFORMANCE REPORT:
October - December 2025

Summary Index

Area	KPI Name	RAG	Page
Revenues, Benefits and Housing	Percentage of Council Tax Collected	Orange	6
	Percentage of Non Domestic Rates collected	Green	7
	Processing times for Council Tax Support new claims	Green	8
	Processing times for Council Tax Support Change Events	Red	9
	Processing times for Housing Benefit Change of Circumstances	Red	10
	Percentage of Housing Benefit overpayment due to LA error/admin delay	Red	11
	(Snapshot) Long Term Empty Properties	Grey	12
	(Snapshot) Number of households in B&B/hotel-type accommodation & Hostels (LA owned or managed); and Number of successful 'Move On' into suitable independent/long-term accommodation from B&Bs/hotels/hostels	Grey	13
Customer Experience	Customer Satisfaction - Telephone	Green	14
	Customer Satisfaction - Email	Grey	15
	Customer Satisfaction - Face to Face	Green	16

Summary Index

Area	KPI Name	RAG	Page
Customer Experience	Customer Call Handling - Average Waiting Time		17
	Complaints		18
	Percentage of FOI requests answered within 20 days		20
Development Management and Land Charges	Building Control Satisfaction		21
	Percentage of major planning applications determined within agreed timescales (including AEOT)		22
	Percentage of minor planning applications determined within agreed timescales (including AEOT)		23
	Percentage of other planning applications determined within agreed timescales (including AEOT)		24
	Total Income achieved in Planning & Income from Pre-application advice		25
	Percentage of Planning Appeals Allowed		26
	Percentage of official land charge searches completed within 10 days		27
	Number of affordable homes delivered		28

Summary Index

Area	KPI Name	RAG	Page
Waste and Environment	Number of fly tips collected and percentage that result in an enforcement action		29
	Percentage of high risk food premises inspected within target timescales		30
	Percentage of high risk notifications risk assessed within 1 working day		31
	Percentage of household waste recycled		32
	Residual Household Waste per Household (kg)		33
	Missed bins per 100,000		34
Leisure	Number of visits to the leisure centres & (Snapshot) Number of gym memberships		35

A note on performance benchmarking

Benchmarking can be a useful tool for driving improvement; by comparing our performance with other similar organisations, we can start a discussion about what good performance might look like, and why there might be variations, as well as learning from other organisations about how they operate (process benchmarking).

When we embark on performance benchmarking, it is important to understand that we are often looking at one aspect of performance i.e. the level of performance achieved. It does not take into account how services are resourced or compare in terms of quality or level of service delivered, for example, how satisfied are residents and customers? Furthermore, each council is unique with its own vision, aim and priorities, and services operate within this context.

Benchmarking has been included wherever possible ranking against other Local Authorities within Oxfordshire County Council. The Councils included are Cherwell, Oxford City, South Oxfordshire and Vale of White Horse.

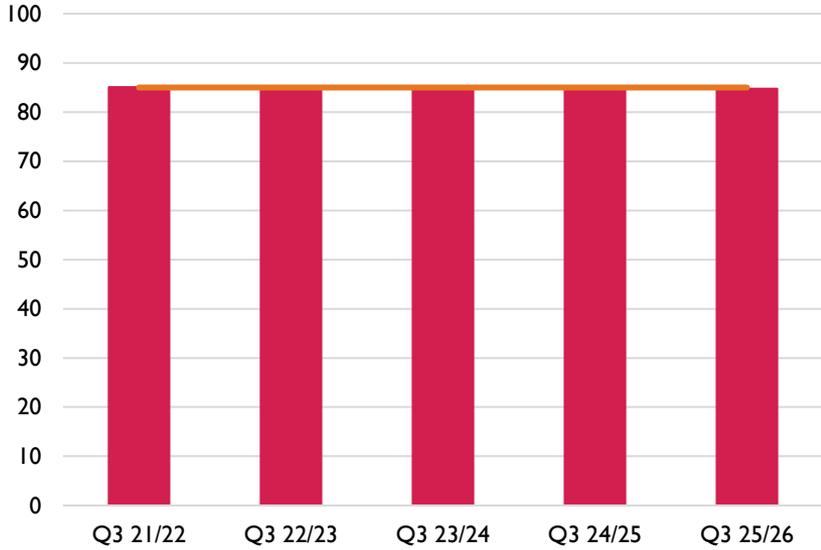
A RAG (red, amber, green) status has been applied to each KPI to provide a quick visual summary of the status of that KPI for the quarter. Additionally, RAG status has been added to the direction of travel for each metric to show how the performance against last quarter and the same quarter compared to last year is progressing.

Overall Performance

Overall, the Councils performance remained strong across many key services, with high customer satisfaction, excellent planning determination times, robust business rates collection and continued growth in leisure participation. Council Tax collection also remained close to target, and several regulatory and environmental indicators continued to perform well. A smaller number of services experienced ongoing pressure, particularly in the processing of Housing Benefit and Council Tax Support changes, where in-quarter improvements have not yet offset the cumulative impact of earlier delays and increasing case complexity. FOI response times dipped below target and Land Charges performance was temporarily affected by staffing shortages, though early signs of recovery are evident. Recycling rates continue to reflect seasonal and national trends. Taken together, Quarter 3 demonstrates strong and consistent delivery across priority services, with targeted improvement work in place where performance remains below expectations.

Moving forward, the Council remains committed to further enhancing its performance and service delivery. A key focus is on the development and implementation of automation and self-service options, aimed at providing customers with accessible and efficient self-help tools. By enabling customers to independently address their queries and concerns, the Council anticipates a reduction in the need for repeated interactions, streamlining services and improving overall efficiency. The Council will continue to monitor the impact of these improvement programs, assessing their effectiveness in reducing customer contact and enhancing operational processes to ensure the delivery of high-quality services to the community.

Percentage of Council Tax Collected



— Target

Direction of Travel

Against last Year 
Slightly decreased since last year

Higher is Good

Target **85%**
Actual **84.78%**

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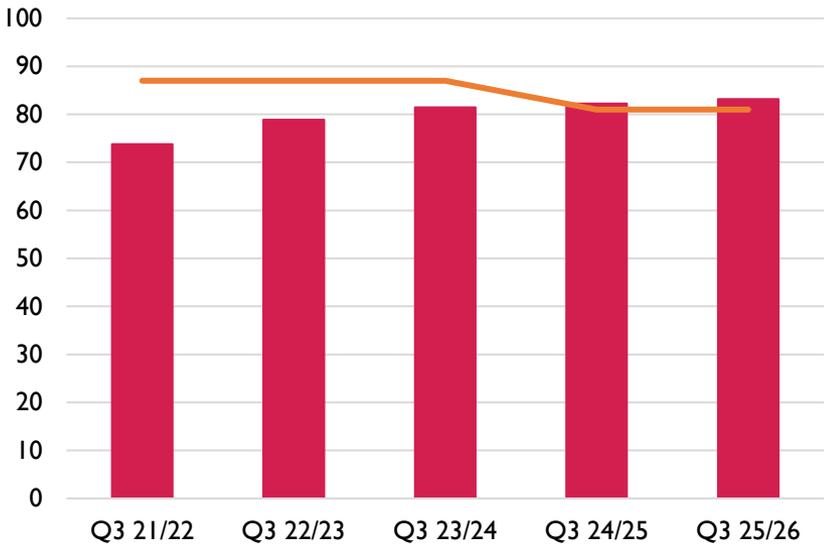
How do we compare?

Benchmarking via Gov.uk Tables and Individual Council Websites using other Local Authorities within Oxfordshire - Current Dataset is up to March '25 (2024-2025)

2024-2025 Benchmark	%	County Rank	Quartile
Cherwell	98.06	1/5	Top
West Oxfordshire	98.02	2/5	Top
South Oxfordshire	97.94	3/5	Second
Vale of White Horse	97.91	4/5	Third
Oxford	96.49	5/5	Bottom

By the end of Q3, the Council narrowly missed its collection target by 0.22%, with the small shortfall largely due to more households moving to 12-month instalment plans. A refreshed Direct Debit campaign is planned to help strengthen collection in future years.

Percentage of Non-domestic rates collected



Direction of Travel

Against last Year 
Increased since last year

Higher is Good

Target	81%
Actual	83.15%

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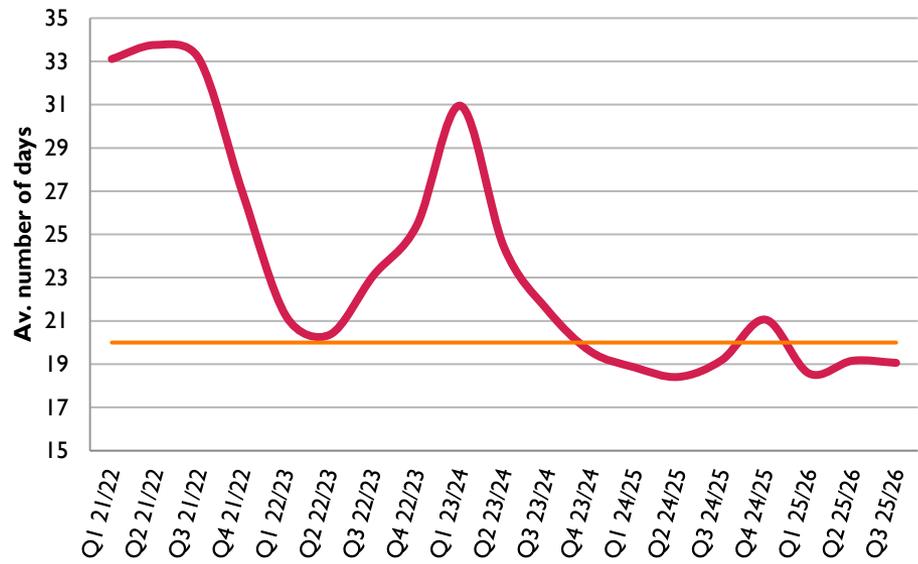
How do we compare?

Benchmarking via Gov.uk Tables and Individual Council Websites using other Local Authorities within Oxfordshire - Current Dataset is up to March '25 (2024-2025)

2024-2025 Benchmark	%	County Rank	Quartile
Cherwell	98.83	1/5	Top
West Oxfordshire	97.66	2/5	Top
Oxford	97.21	3/5	Second
Vale of White Horse	97.08	4/5	Third
South Oxfordshire	96.64	5/5	Bottom

By the end of Q3, the Council collected 83.15%, exceeding its 81% target and improving on last year's 82.25%. Up-to-date billing and account maintenance have supported this continued year-on-year improvement.

Processing times for Council Tax Support new claims



— Target

Direction of Travel

Against last Quarter 

Against last Year 

Decreased since last quarter and last year

Lower is Good

Target	20
Actual	19.06

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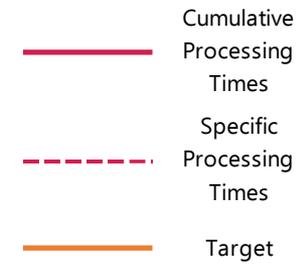
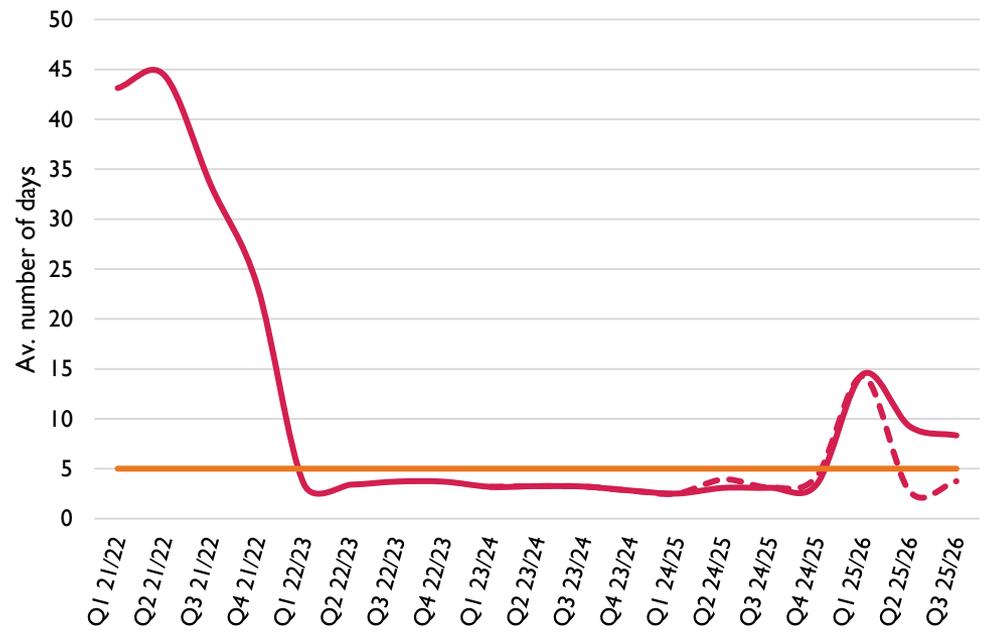
How do we compare?

Gov.uk produces tables to show a snapshot of the number of CTS claimants at the end of each financial year. The below table shows number of claimants at the end of September 2025 and the percentage change from September 2024 for each authority.

	Number of Claimants at end of Sept 2025	Percentage Change since Sept 2024
Oxford	8,430	-10.17%
Cherwell	5,904	-1.47%
West Oxfordshire	4,370	-0.70%
South Oxfordshire	4,887	-0.24%
Vale of White Horse	5,097	6.52%

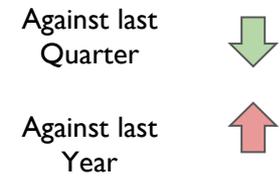
The Council remains below its target for processing times for Council Tax new claims.

Processing times for Council Tax Support Change Events



Lower is Good

Direction of Travel



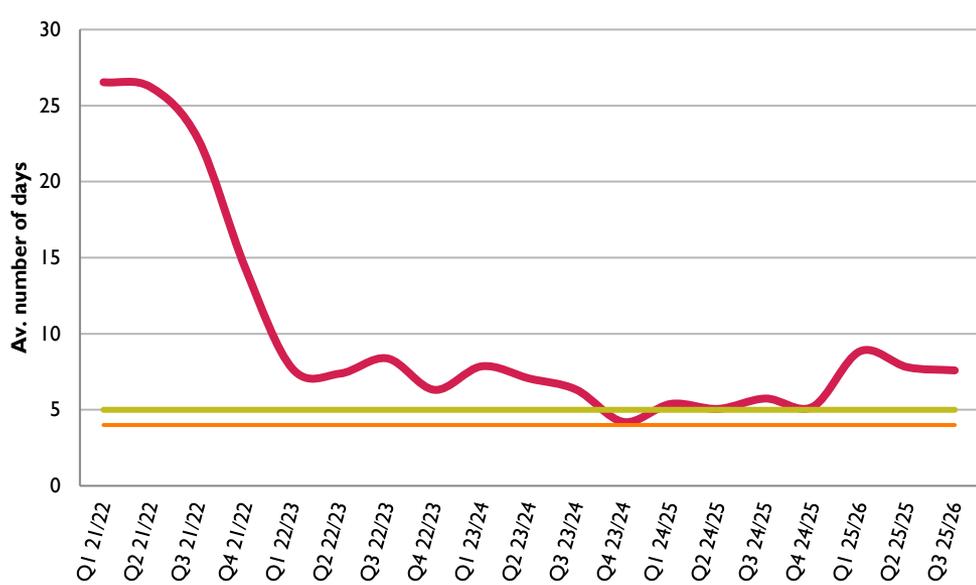
Decreased since last quarter but increased since last year

Target	5
Actual	8.33

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The cumulative processing time for Council Tax Support Change of Events remains over target, though it continued to improve through Q3. The in-quarter average from October to December was 3.74 days with the trend showing ongoing progress even as further acceleration becomes limited.

Processing times for Housing Benefit Change of Circumstances



Direction of Travel

Against last Quarter 

Against last Year 

Decreased slightly since last quarter but increased since last year

Lower is Good

Target	4
Actual	7.59

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How do we compare?

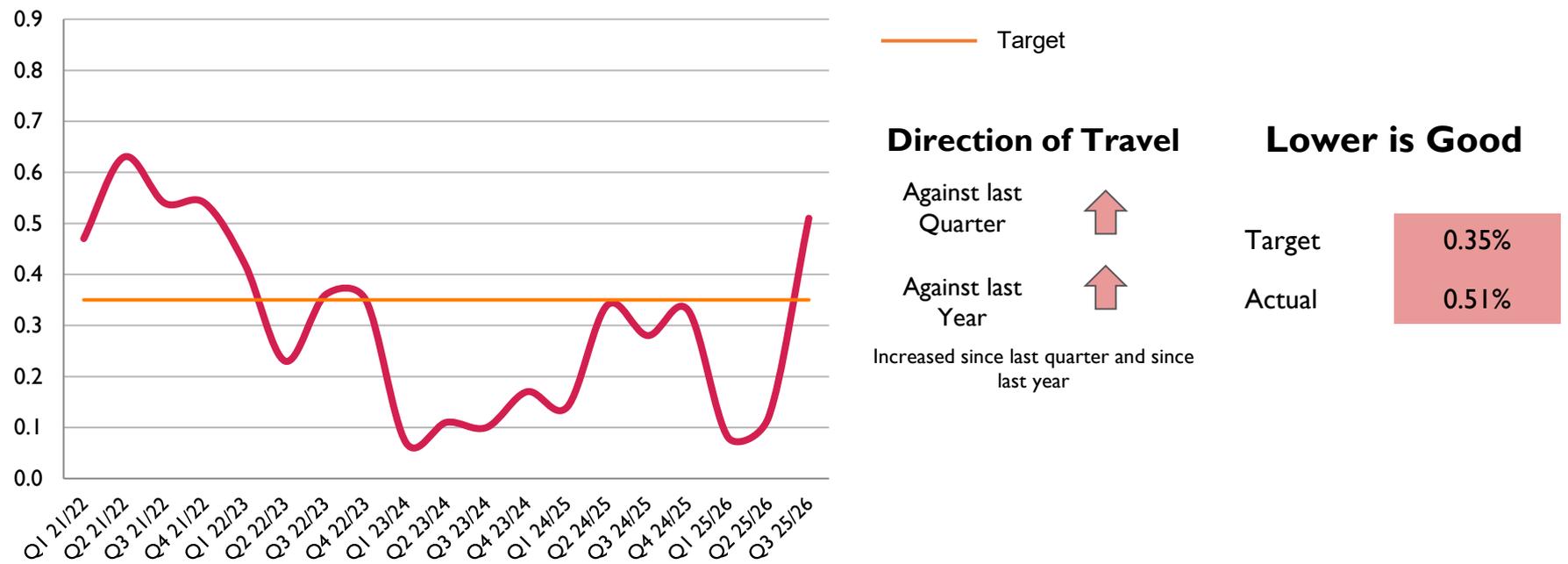
Gov.uk produces tables showing statistics on the average number of days to process a change in circumstance of an existing Housing Benefit claim. Latest Release – April – June 2025 (Q1 25-26)

Q1 25-26 Benchmark	Days	County Rank	Quartile
Cherwell	5.38	1/5	Top
South Oxfordshire	7.23	2/5	Top
Vale of White Horse	7.23	3/5	Second
West Oxfordshire	8.73	4/5	Third
Oxford	25.86	5/5	Bottom

Housing Benefit processing times remained over the cumulative target in Q3, affected by seasonal workload pressures and delays in receiving evidence for Change Events and Full Claim Reviews. The planned UC pause helped reduce parts of the backlog, with all scheduled CFU reviews completed on time and the HBAA Claims Review continuing into next year. With fewer HB change applications now coming in, any outstanding evidence has a greater impact on the cumulative metric, though the higher volume of HB changes expected in Q4 may help improve processing times toward year-end.

Percentage of Housing Benefit overpayment due to LA error/admin delay

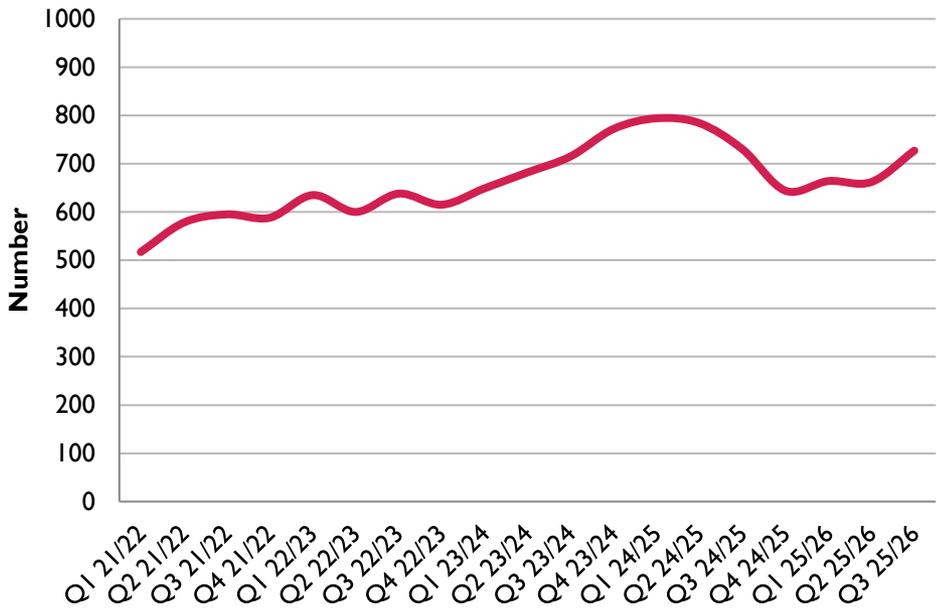
Page 405



The Council exceeded the national 0.48% target this quarter due to a significant claim overpayment identified by officers. Although the rate is steadily falling, it is unlikely to meet the service target, but is expected to return within the national threshold by the end of Q4. Any Government penalties would be based on the final year-end figure.

(Snapshot) Long Term Empty Properties

Page 406



Direction of Travel

Against last Quarter 

Against last Year 

Increased since last quarter and decreased since last year

Lower is Good

727

How do we compare?

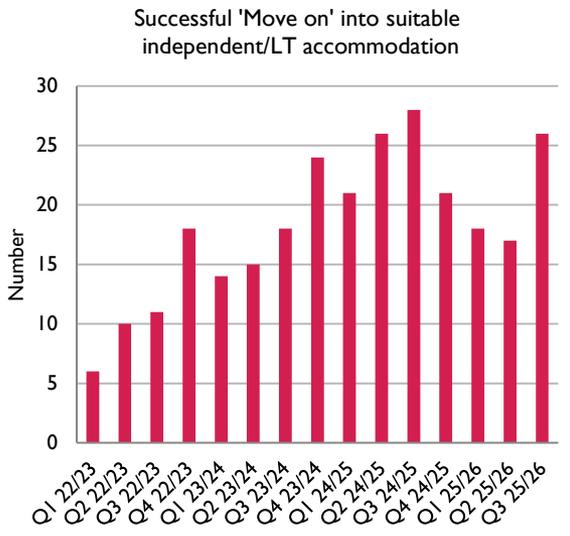
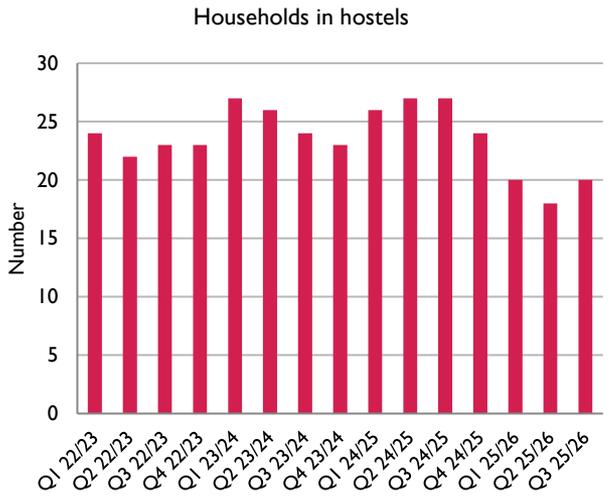
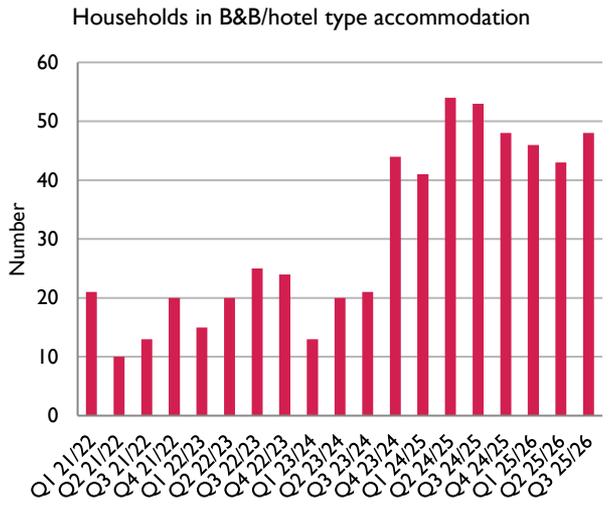
Long Term Vacant Properties within districts - Benchmarking via Gov.uk

2024 Benchmark	Days	County Rank	Quartile
South Oxfordshire	430	1/5	Top
Vale of White Horse	433	2/5	Top
Cherwell	456	3/5	Second
Oxford	712	4/5	Third
West Oxfordshire	767	5/5	Bottom

The Council saw an increase in long-term empty properties in Q3, driven primarily by improved reporting processes that provide a more accurate picture of empty homes across the district. Around 60% of these properties have been empty for less than two years; if the measure reflected only those vacant for more than two years, the total for West Oxfordshire would fall to 297.

(Snapshot) Number of households in B&B/hotel-type accommodation & Hostels (LA owned or managed); and Number of successful 'Move On' into suitable independent/long-term accommodation from B&Bs/hotels/hostels

Page 407



Direction of Travel

Against last Quarter	B&B/Hotels	↓
Against last Year	B&B/Hotels	↓
Against last Quarter	Hostels	↓
Against last Year	Hostels	↓
Against last Quarter	Move Ons	↓
Against last Year	Move Ons	↓

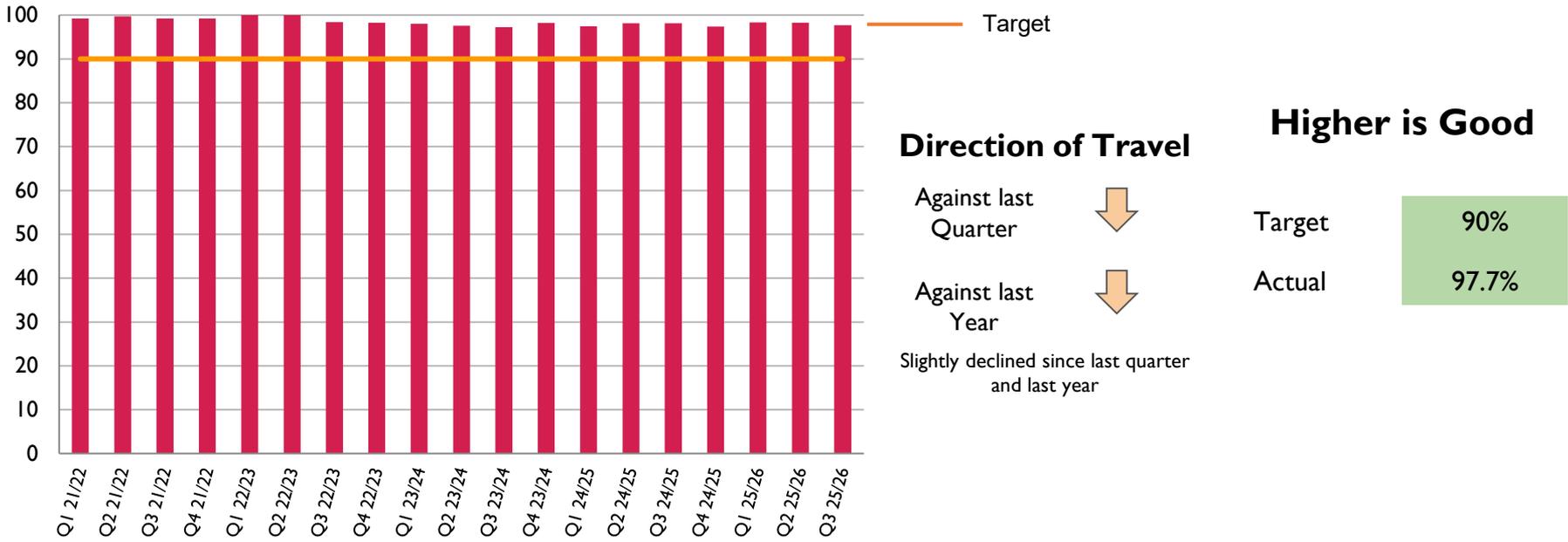
The number in temporary accommodation is gradually declining reflecting strong prevention activity and effective partnership working with local housing providers. Programmes such as the Local Authority Housing Fund (LAHF) are increasing the supply of self-contained temporary accommodation. Two hostel purchases have been completed and work is underway with the Assets Team to bring them into use, with a further four acquisitions progressing.

How do we compare?

The Institute for Government has published the Homelessness Performance Tracker, which evaluates the effectiveness of local homelessness services in England by analysing data on demand, funding, and outcomes over time. The full report is available [here](#).

Customer Satisfaction - Telephone

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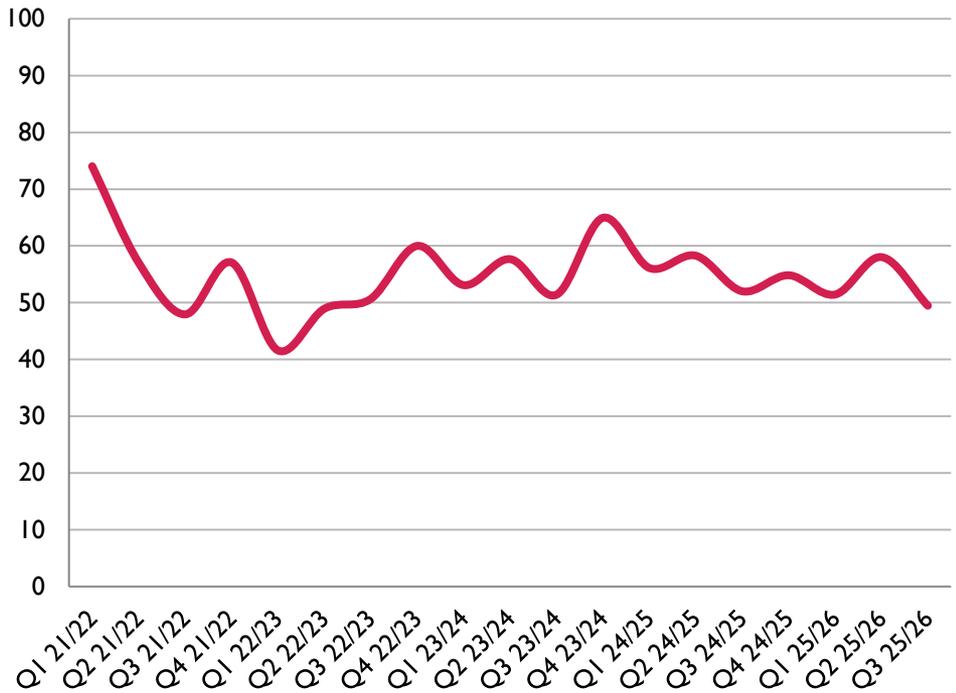
How do we compare?

The Govmetric Channel Satisfaction Index is a monthly publication of the top performing councils across the core customer access channels. At least 100 customers need to be transferred to the survey to be included in the league table so even if satisfaction is high, it may not be included.

A total of 522 residents participated in the survey, of these, 510 customers reported being satisfied with the service, reflecting a high level of overall satisfaction.

	Oct. Rank	Oct. Net Sat.	Nov. Rank	Nov. Net Sat.	Dec. Rank	Dec. Net Sat.
West Oxfordshire	4	92%	1	100%	4	94%

Customer Satisfaction - Email



Direction of Travel

Against last Quarter 

Against last Year 

Declined since last quarter and slightly declined since last year

Higher is Good

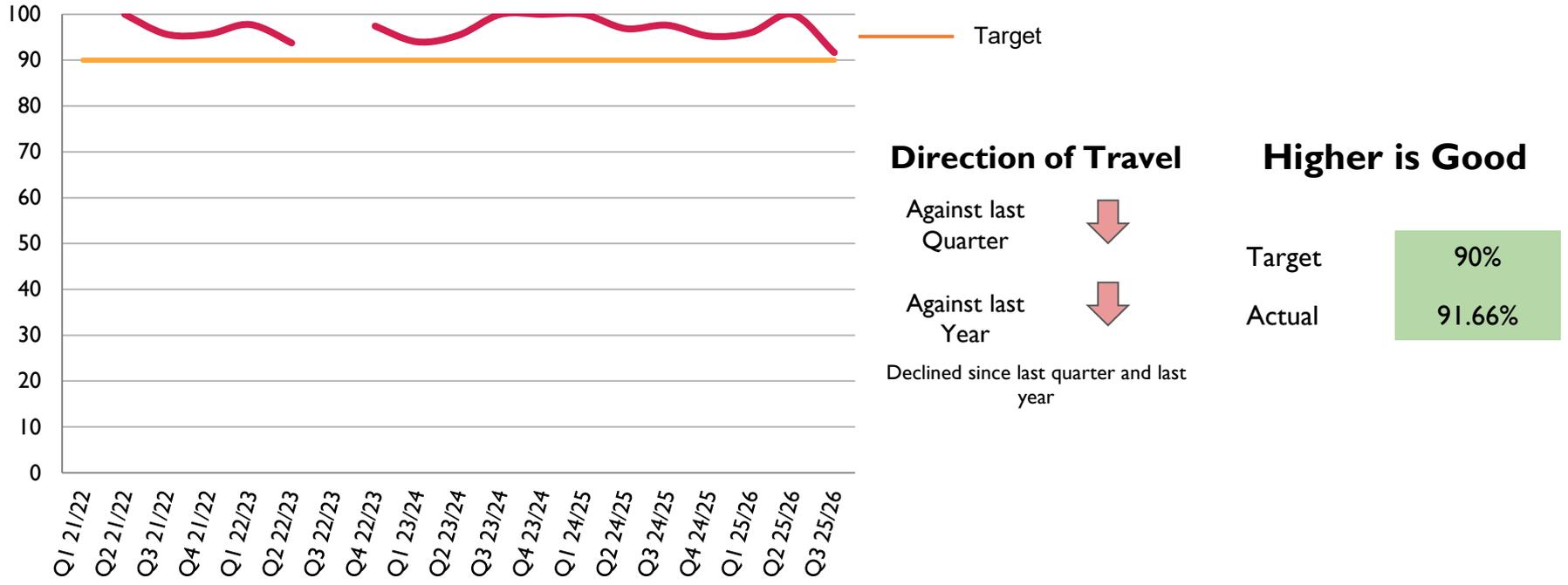
49.46%

Page 409

374 residents responded to the survey, with 185 expressing satisfaction (49.46%), down from 58.03% in Q2, with all outbound customer service emails including a survey link. The team continually monitors feedback closely and proactively seeks opportunities to enhance the overall customer experience.

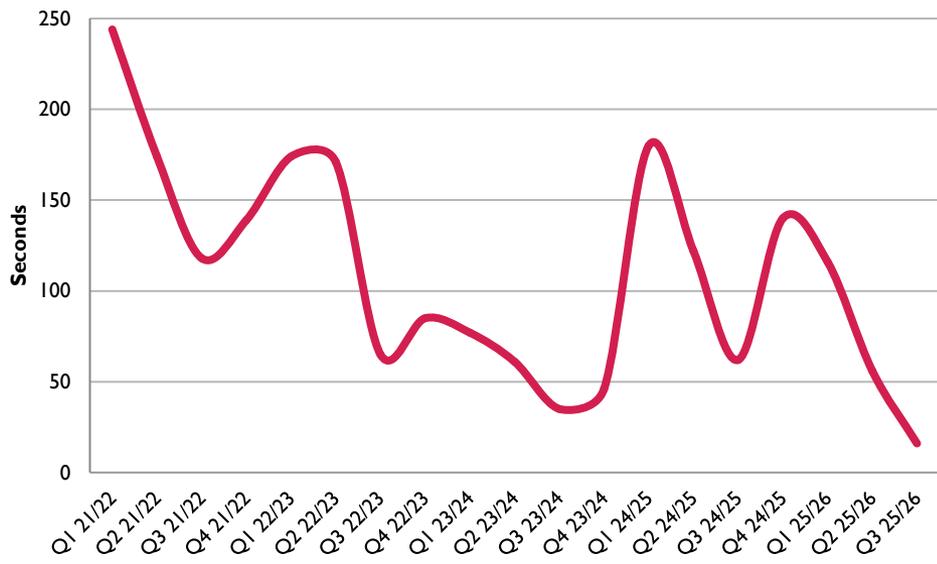
Customer Satisfaction - Face to Face

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Customer satisfaction with face-to-face interactions remains consistently strong, with 22 of 24 customers satisfied.

Customer Call Handling - Average Waiting Time



Direction of Travel

Against last Quarter 

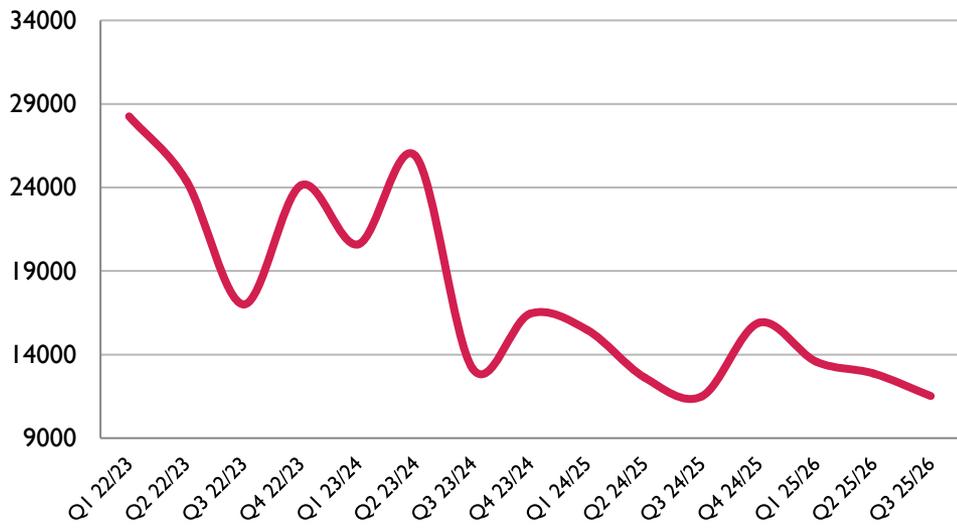
Against last Year 

Decreased since last quarter and last year

Lower is Good

16 Seconds

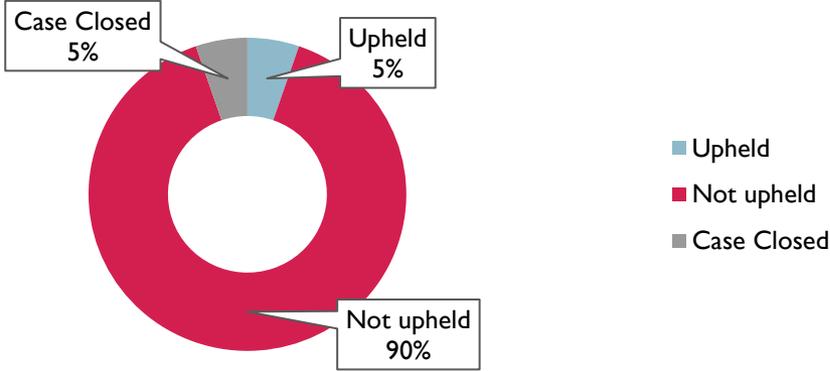
Call Volume over Time



Average call waiting times improved by around 45 seconds compared with the same period last year, when staffing pressures contributed to longer delays. Despite higher sickness levels this quarter, the team maintained strong performance, supported by ongoing training and refresher sessions that helped ensure consistent service delivery.

Number of complaints upheld

Complaints by Status



Direction of Travel

Complaints upheld or partly upheld at Stage 1

Against last Quarter 

Against last Year 

Declined since last quarter but slightly increased last year

Page 412

See the table on the following page for a breakdown of those upheld and partially upheld.

A new Customer Feedback Procedure went live on the 1st April 2025.

The new process has the following stages:

- Stage 1: A review of the complaint will be undertaken by an Operational Manager within the Service Area to which the complaint relates. A response needs to be provided within 10 working days from the date that we advised that the complaint was valid.
- Stage 2: Requests for Stage 2 will be acknowledged and logged within five working days of the escalation request being received. Upon receipt of a Stage 2 request, an investigation into the complaint will be undertaken by the Complaint Officer or a member of the Complaints Team. A response will be provided to the customer within 20 working days from receipt of the request to escalate the complaint to Stage 2. Stage 2 is the organisation's final response; the complainant can then refer their complaint to the LGO.

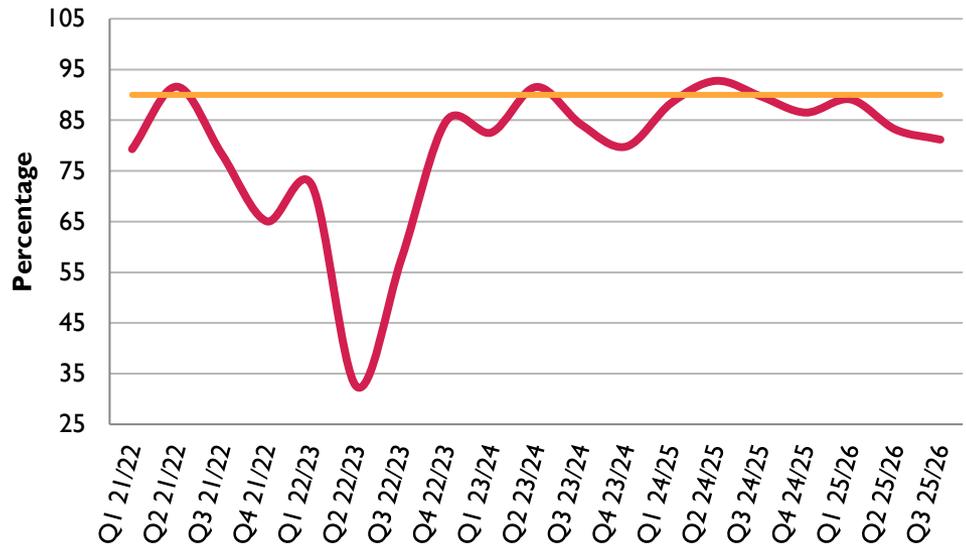
How do we compare?

There is some benchmarking available on the number of complaints received by the Ombudsman. These figures reflect cases where customers, having completed the Council's internal complaints process, feel that the matter has not been satisfactorily resolved. However, due to the very small number of Ombudsman complaints received, the data does not provide meaningful trends or insights for this period. Figures can be found [here](#).

Complaints Upheld or Partially Upheld Breakdown

Service area	Description	Outcome/learning	Decision	Response time (days)
Revenues & Benefits	A customer moved abroad, but this was not passed on to the council tax team, so bills continued to be issued to the UK address.	It was later identified that an email had been sent to Customer Services in 2024 but was not forwarded to the revenues team. An apology was given, and enforcement fees were removed from the account.	Upheld	7

Percentage of FOI requests answered within 20 days



— Target

Direction of Travel

Against last Quarter 

Against last Year 

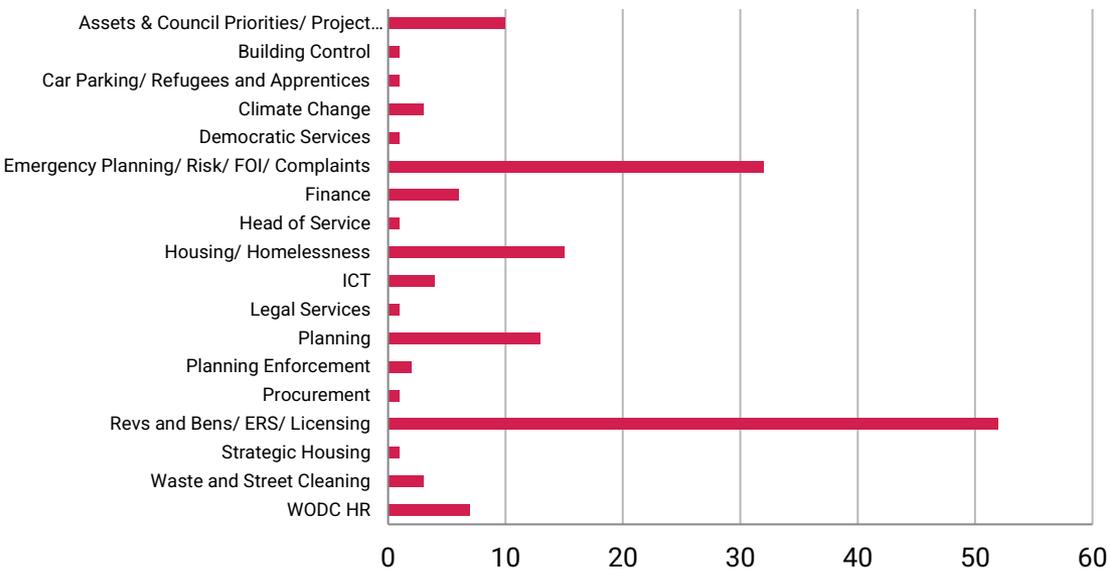
Declined since last quarter and last year

Higher is Good

Target	90%
Actual	81.17%

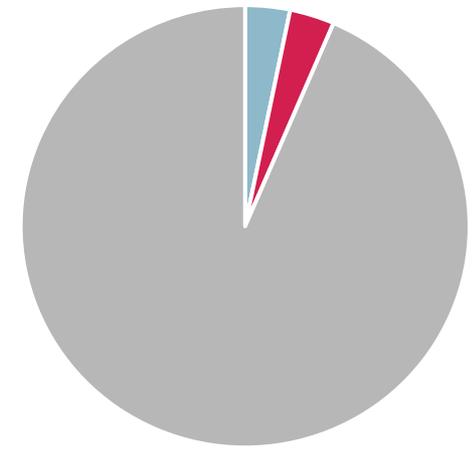
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Requests by Service Area



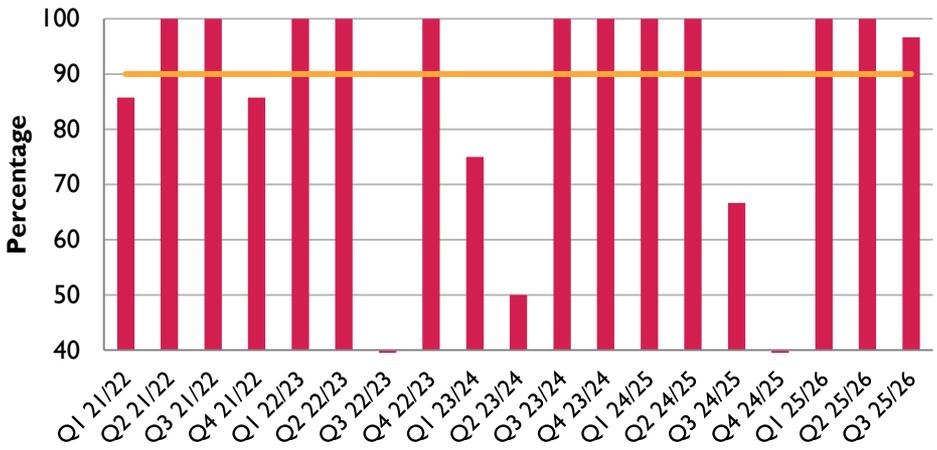
Reason FOI request was not Answered within 20 Days

-  Awaiting clarification from requester
-  FOI admin backlog
-  Service Area not provided Information in time



All Freedom of Information requests for the quarter have been addressed.

Building Control Satisfaction



Target

Direction of Travel

Against last Quarter 

Against last Year 

Slightly decreased since last quarter and last year

Higher is Good

Target	90%
Actual	96.67%

Page 415

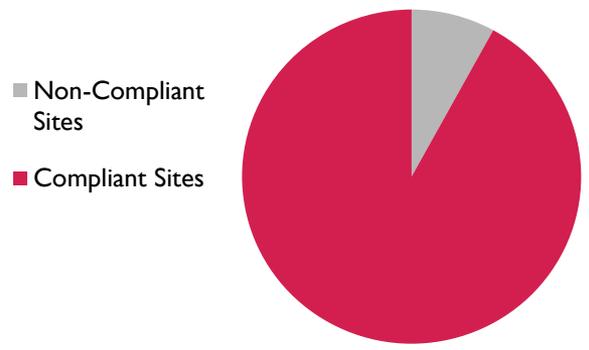
A new customer-feedback webform was introduced in October and issued with completion certificates. Early responses have been very positive, with customers praising the team’s helpful, pragmatic support and swift turnaround. Of the six responses, only one was less than 100%, noting that the requirement for a signed Declaration of Completion wasn’t made clear at the outset.

How do we compare?

Percentage of share in the market

Oct.	Nov.	Dec.	Number of Apps for Quarter
77%	73%	38%	149

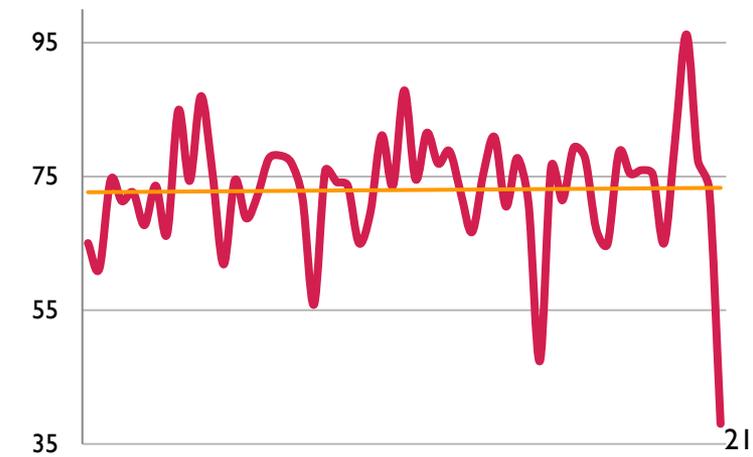
% of Sites that are Affected by Non-Compliance



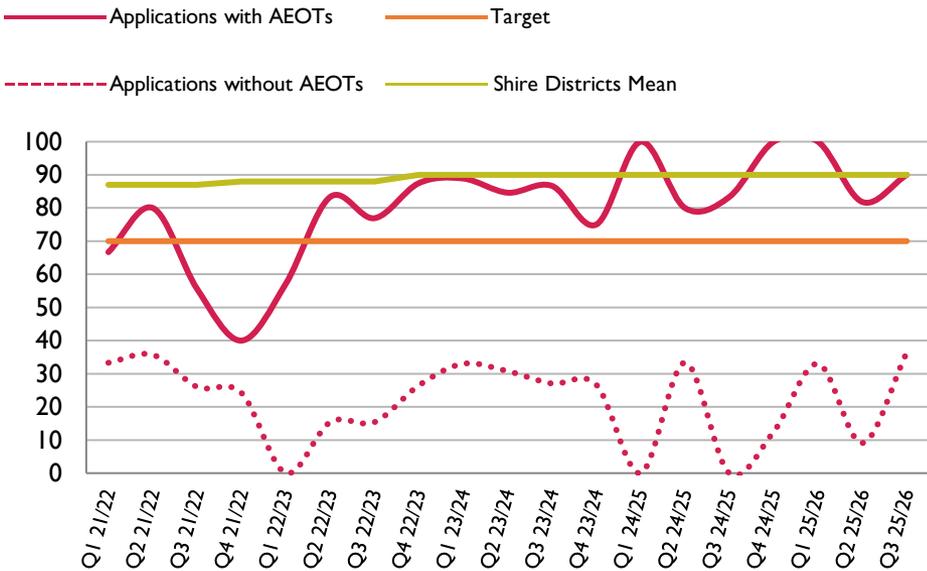
Interventions by Building Control

In Q3, the team carried out 809 site inspections, with non-compliances identified during 64 of them — 8% of all inspections. Across those 64 visits, a total of 176 non-compliances were recorded, including 16 structural issues, 30 related to fire safety, and 28 thermal issues (covering Conservation of Fuel & Power and Overheating). The Building Control service aims to guide builders and customers toward achieving compliance, but when guidance is not followed or sought, the team steps in to ensure that minimum regulatory standards are met.

The below chart shows market share over time from April 2021



Percentage of major planning applications determined within agreed timescales (including AEOT)



Direction of Travel

Against last Quarter 

Against last Year 

Increased since last quarter and last year

Higher is Good

Target **70%**

Actual **90.01%**

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How do we compare?

Major Developments - % within 13 weeks or agreed time – LG Inform

Q2 25-26 Benchmark	%	County Rank	Quartile
Oxford	92	1/5	Top
Vale of White Horse	92	1/5	Top
Cherwell	89	3/5	Second
South Oxfordshire	88	4/5	Third
West Oxfordshire	82	5/5	Bottom

The service demonstrated consistently strong performance in Q3, with ten out of eleven Major applications processed within the agreed timescales.

Percentage of minor planning applications determined within agreed timescales (including AEOT)



Direction of Travel

Against last Quarter 

Against last Year 

Decreased since last quarter but steady since last year

Higher is Good

Target 65%

Actual 93.94%

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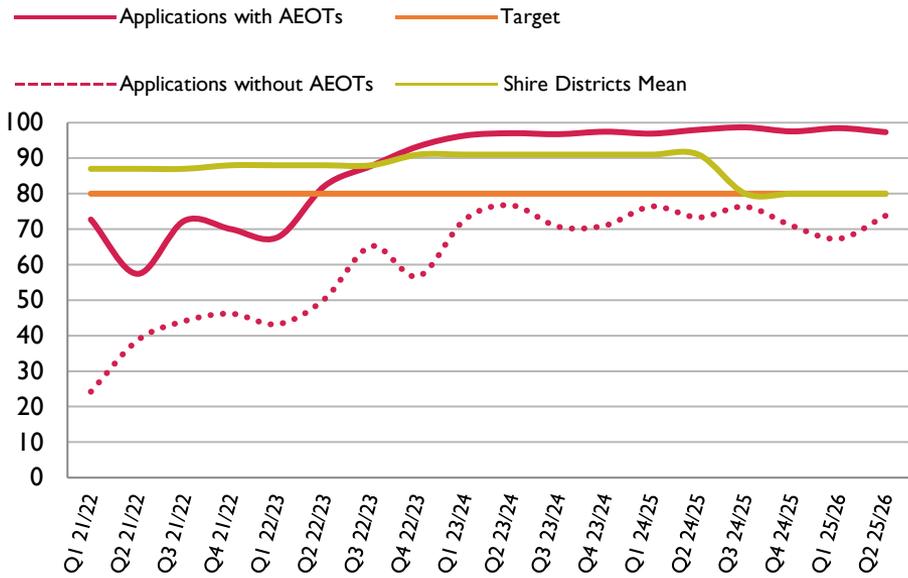
How do we compare?

Minor Developments - % within 8 weeks or agreed time – LG Inform

Q2 25-26 Benchmark	%	County Rank	Quartile
West Oxfordshire	98	1/5	Top
Vale of White Horse	91	2/5	Top
Oxford	89	3/5	Second
South Oxfordshire	82	4/5	Third
Cherwell	79	5/5	Bottom

This quarter, delays persist due to the absence of a dedicated Landscape Officer; however, recruitment has been successful, with the new officer expected to start in March. The team is also preparing for increased demand resulting from forthcoming legislative changes and the introduction of the Community Infrastructure Levy (CIL) from February.

Percentage of other planning applications determined within agreed timescales (including AEOT)



Direction of Travel

Against last Quarter 

Against last Year 

Increased since last quarter and last year

Higher is Good

Target

80%

Actual

98.99%

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How do we compare?

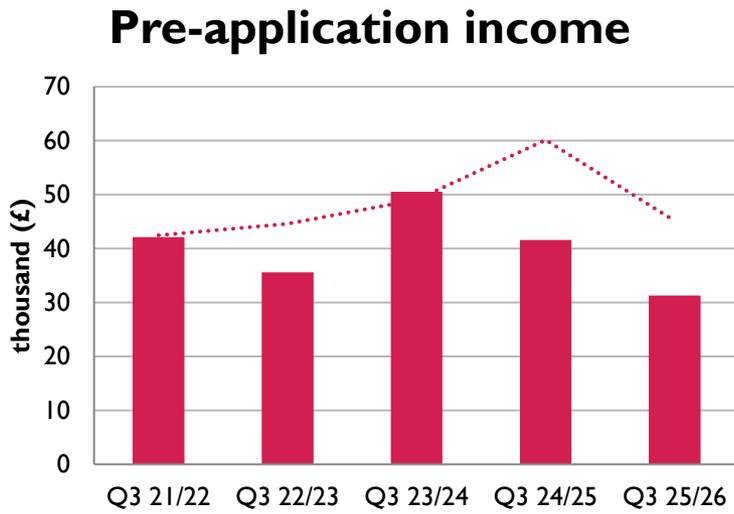
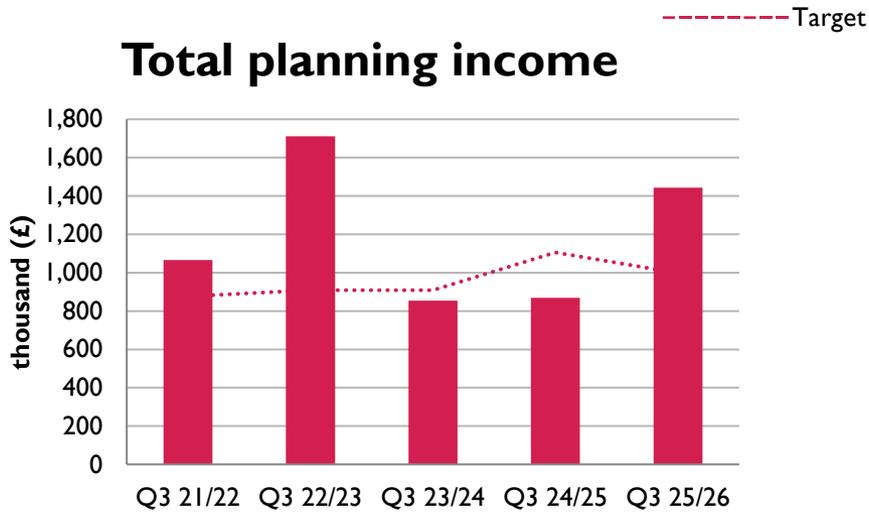
Other Developments - % within 8 weeks or agreed time – LG Inform

Q2 25-26 Benchmark	%	County Rank	Quartile
West Oxfordshire	97	1/5	Top
Vale of White Horse	96	2/5	Second
South Oxfordshire	91	3/5	Second
Oxford	89	4/5	Third
Cherwell	79	5/5	Bottom

Determination times remain high, with 199 applications processed in Q3, including 197 within agreed timescales.

Total Income achieved in Planning & Income from Pre-application advice

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Direction of Travel

- Total Planning Income
 - Against last Quarter
 - Against last Year
- Pre-Application Income
 - Against last Quarter
 - Against last Year

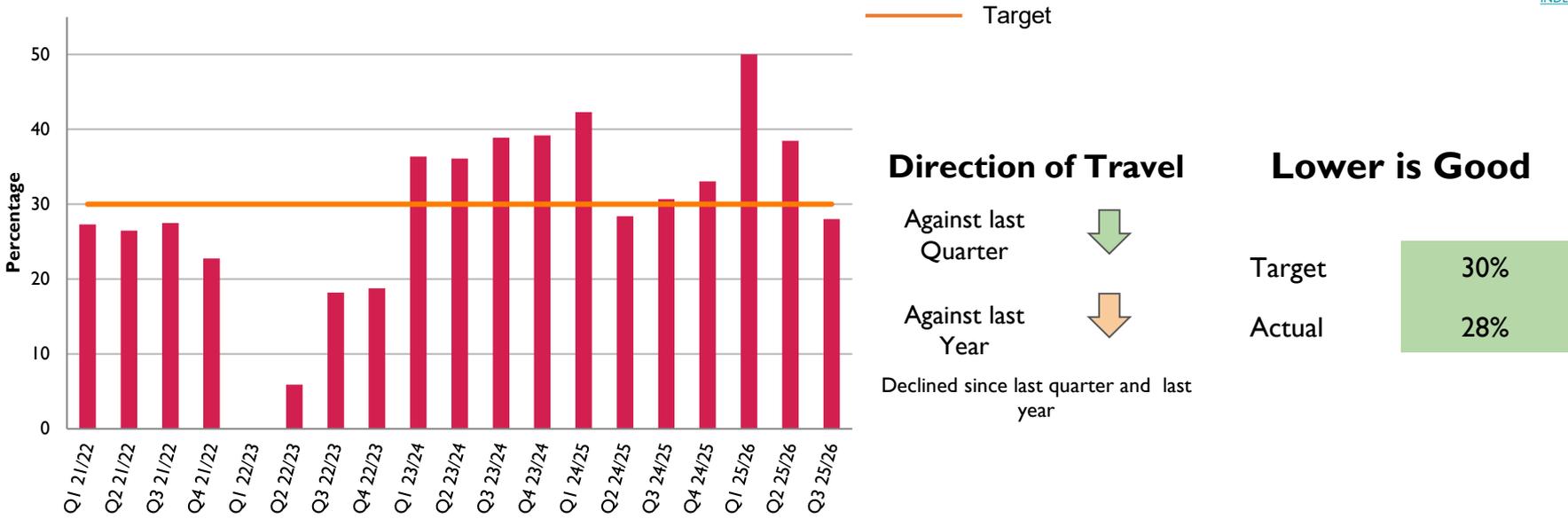
Higher is Good

Total Planning Income (£)	
Target	997,630
Actual	1,444,081
Pre-Application Income (£)	
Target	45,130
Actual	31,282

Total Income decreased since last quarter but increased since last year
 Pre-App Income increased since last quarter but decreased since last year

In Q3, the council recorded high financial performance, with strong income received during the quarter contributing positively towards the annual target. However, pre-application uptake remains low, and the team is currently exploring pricing adjustments alongside a renewed focus on Planning Performance Agreements (PPAs).

Percentage of Planning Appeals Allowed (cumulative)



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How do we compare?

Percentage of planning appeals allowed (Specifically Q2 2025-26)

Q2 25-26 Benchmark	%	County Rank	Quartile
West Oxfordshire	20	1/5	Top
Oxford	25	2/5	Top
South Oxfordshire	33	3/5	Second
Vale of White Horse	50	4/5	Third
Cherwell	53	5/5	Bottom

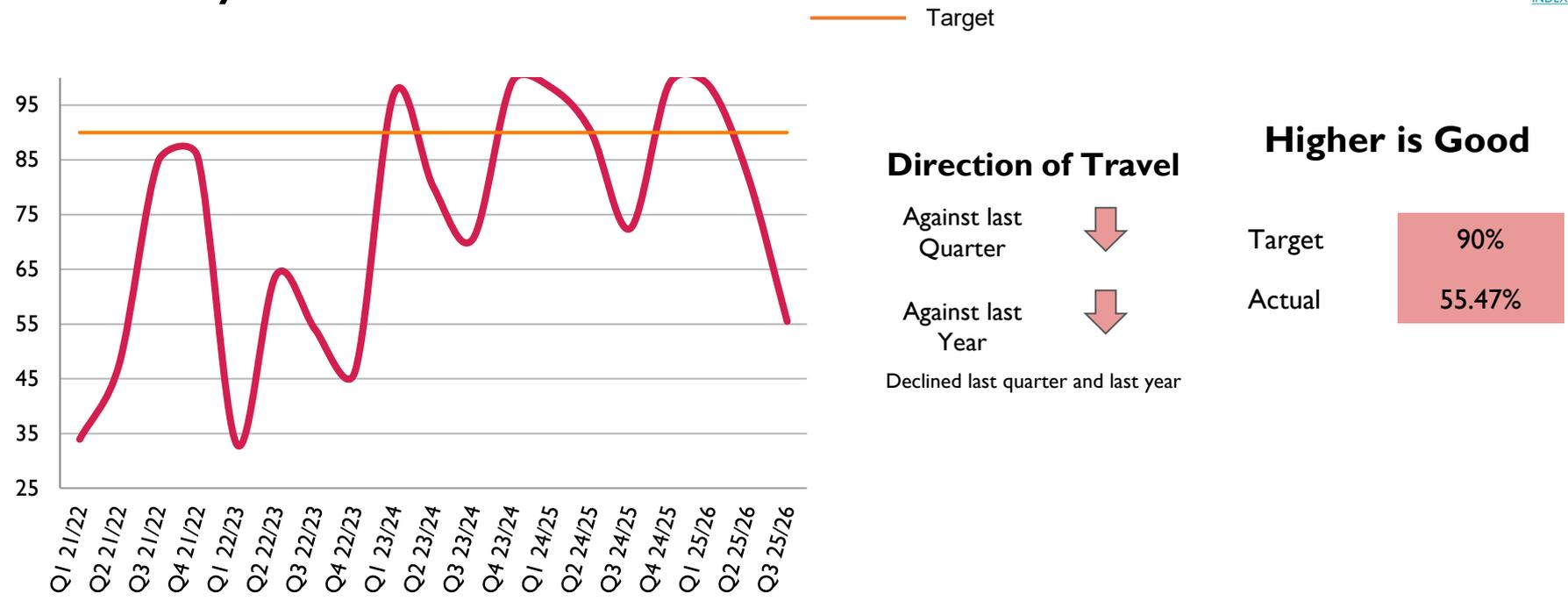
This indicator aims to ensure that no more than 30% of planning appeals are allowed in favor of the applicant, with a lower percentage being more favorable. According to the latest statistics from the Planning Inspectorate, the national average for Section 78 planning appeals granted is 28% (source: [gov.uk](https://www.gov.uk)).

The below shows the appeal split between Uplands and Lowlands applications for the year;

	Decided	Allowed	% Allowed
Uplands	12	5	41.67%
Lowlands	13	2	15.38%

Of the seven appeals allowed, none related to officer recommendations that have been overturned by planning sub-committees.

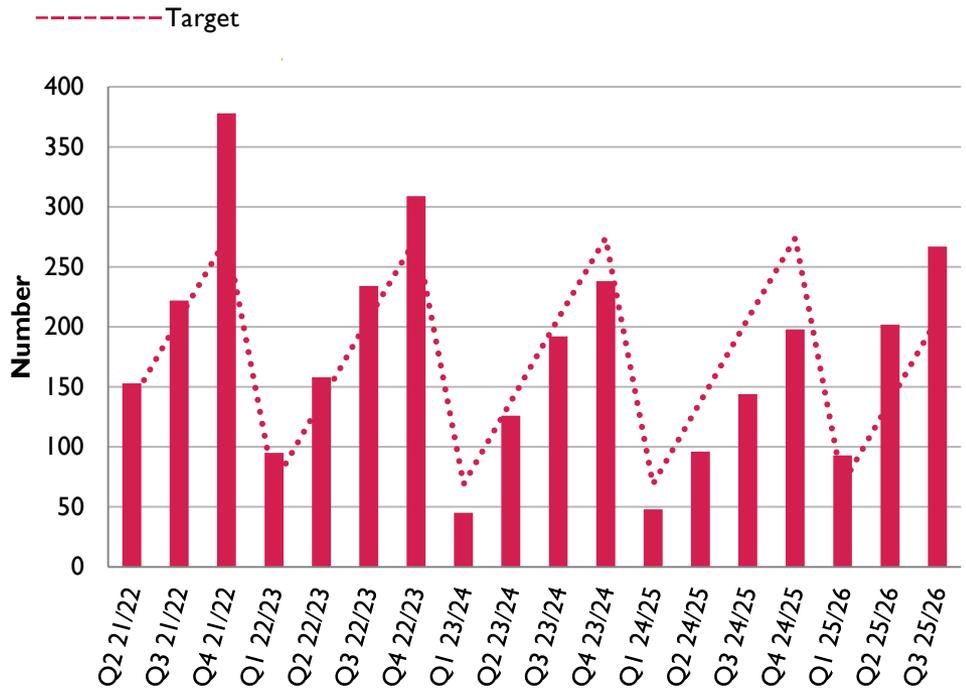
Percentage of official land charge searches completed within 10 days



Page 421

During Q3, the Council saw a drop in performance against the 10-day target for Land Charges searches after the loss of a team member in September, which created a backlog. Additional administrative support has since been brought in to help stabilise the service and clear older cases. Early signs show the approach is working and performance is beginning to recover.

Number of affordable homes delivered (cumulative)



Direction of Travel

- Against last Quarter 
- Against last Year 
- Decreased since last quarter but increased since last year

Higher is Good

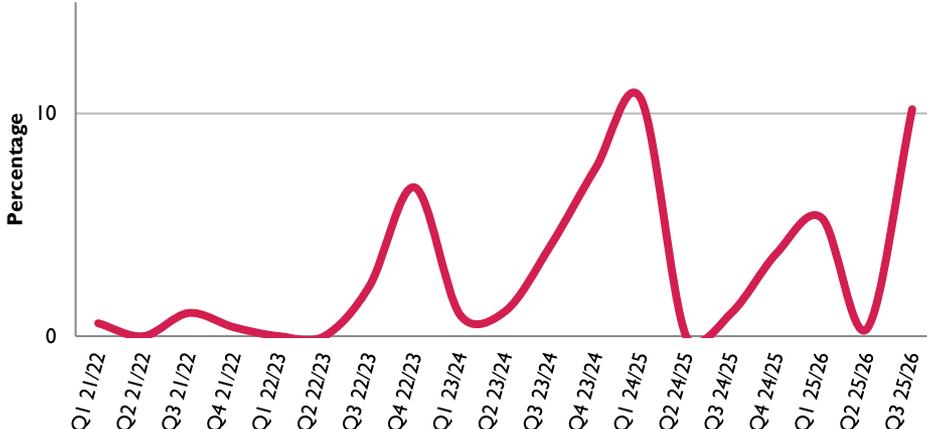
Target	207
Actual	267

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The Council delivered 65 affordable homes in Q3, bringing the year-to-date total to 267, reflecting continued strong progress across the district. A key milestone was completion of the Milestone Road development, adding a significant number of new affordable units. In addition, eight homes were acquired through grant funding in partnership with SOHA, including four designated for Temporary Housing Accommodation, boosting local capacity for households in urgent need.

Number of fly tips collected and percentage that result in an enforcement action

(defined as a warning letter, fixed penalty notice, simple caution or prosecution)



Direction of Travel

Number of Fly Tips		
Against last Quarter		Number of Fly Tips Collected
Against last Year		148
Percentage Enforcement Action		
Against last Quarter		Percentage Enforcement Action
Against last Year		10.19%

How do we compare?

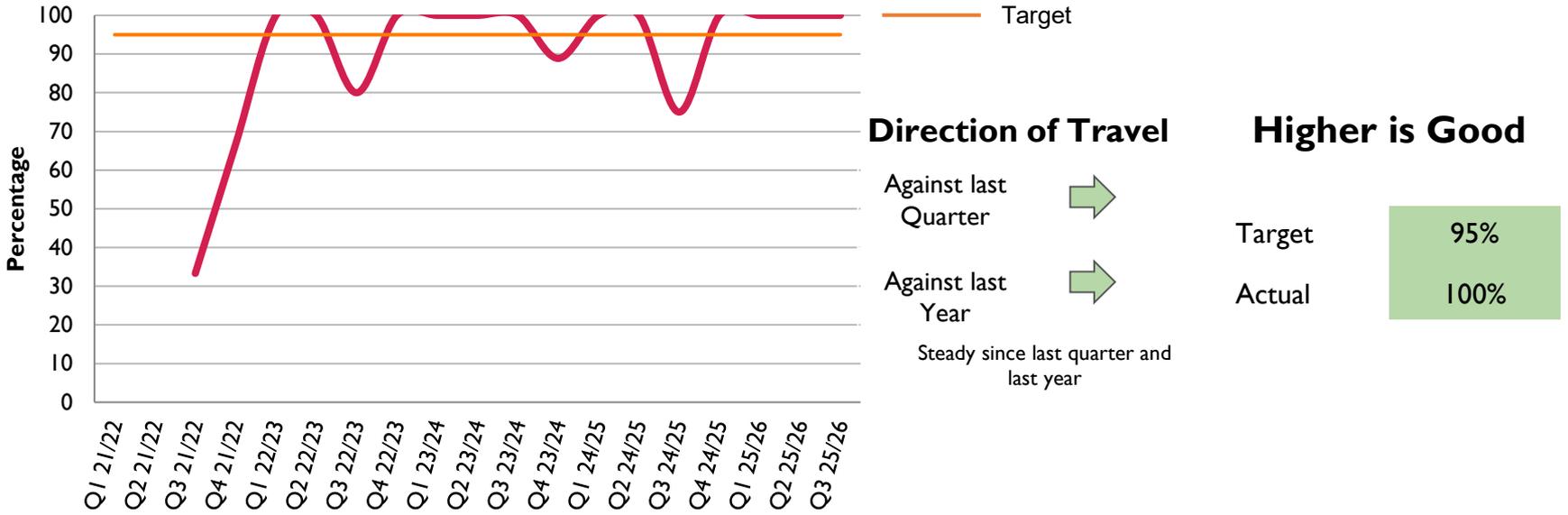
Number of Fly Tips reported for year 2023-24 for Local Authorities in England – Gov.uk. The latest dataset available is 2023-24.

	Total Fly Tips	Total FPNs	% FPNs per Fly Tip	County Rank	Quartile
Vale of White Horse	445	18	4.04%	1/5	Top
South Oxfordshire	873	21	2.41%	2/5	Top
Cherwell	1101	26	2.36%	3/5	Second
West Oxfordshire	1135	13	1.15%	4/5	Third
Oxford	4959	7	0.14%	5/5	Bottom

Fly Tips – Steady since last quarter but declined since last year
 Enforcement Action – Increased since last quarter and last year

In Q3, the team delivered its first stop-and-search with Thames Valley Police and HMRC, stopping 38 vehicles and issuing waste-carrier compliance notices, with more joint operations planned for 2026. Work has begun on a district-wide PSPO to tackle dog fouling, and the team also cleared an abandoned caravan encampment, supported rough sleeper rehoming and achieved a full reduction in fly-tipping through surveillance. Public awareness campaigns have increased, focusing on fly-tipping, Duty of Care and business waste compliance. Budget growth for an additional officer is currently awaiting member approval, which will further strengthen capacity.

Percentage of high-risk food premises inspected within target timescales

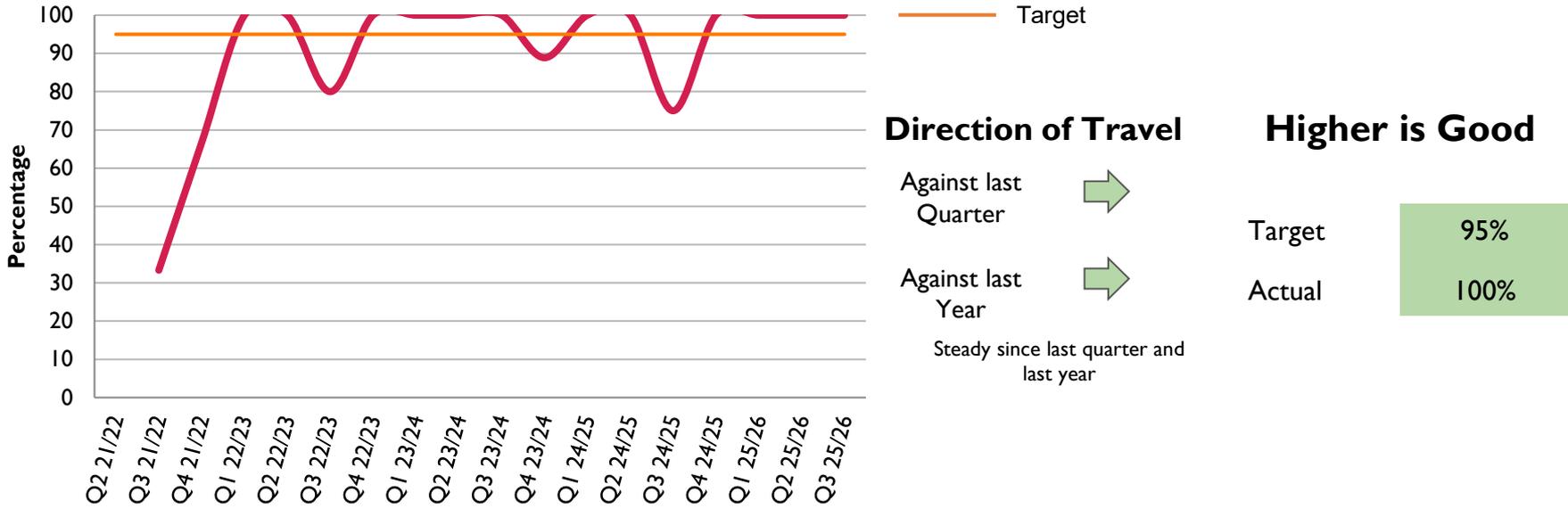


Page 424

Four High-Risk food inspection was undertaken during Q3, which were completed within the target timeframes.

% High-risk notifications risk assessed within 1 working day

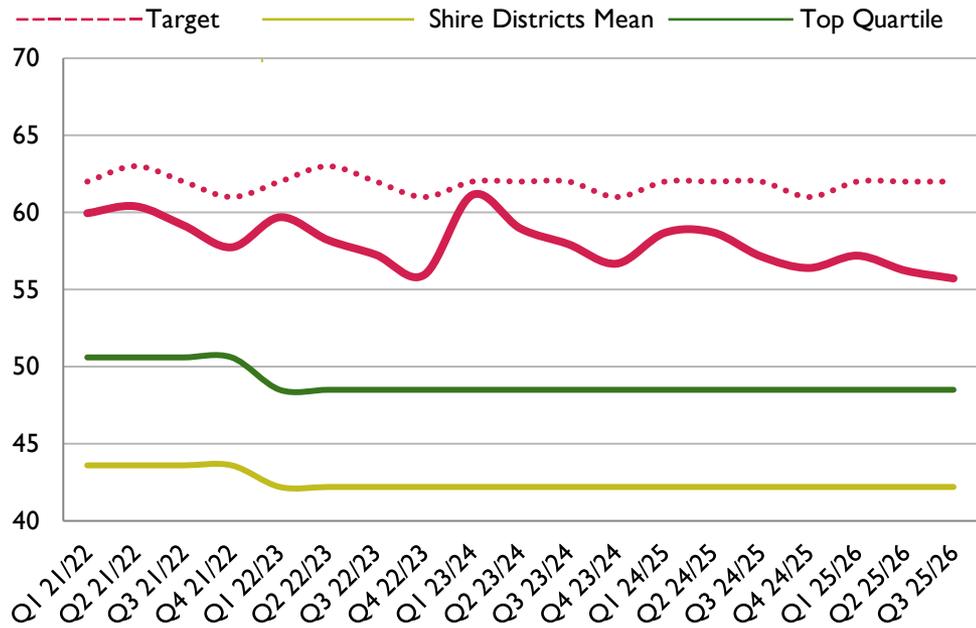
(including food poisoning outbreaks, anti-social behaviour, contaminated private water supplies, workplace fatalities or multiple serious injuries)



Page 425

Two notifications were received during Q3, both of which were assessed within one working day.

Percentage of household waste recycled



Direction of Travel

Against last Quarter 

Against last Year 

Declined since last quarter and last year

Higher is Good

Target **62%**

Actual **55.72%**

Breakdown of Recycling

Dry Recycling 23.29%

Garden Waste 23.09%

Food 9.34%

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How do we compare?

Percentage of household waste sent for reuse, recycling or composting – Gov.uk. The latest dataset available is from 2023-2024.

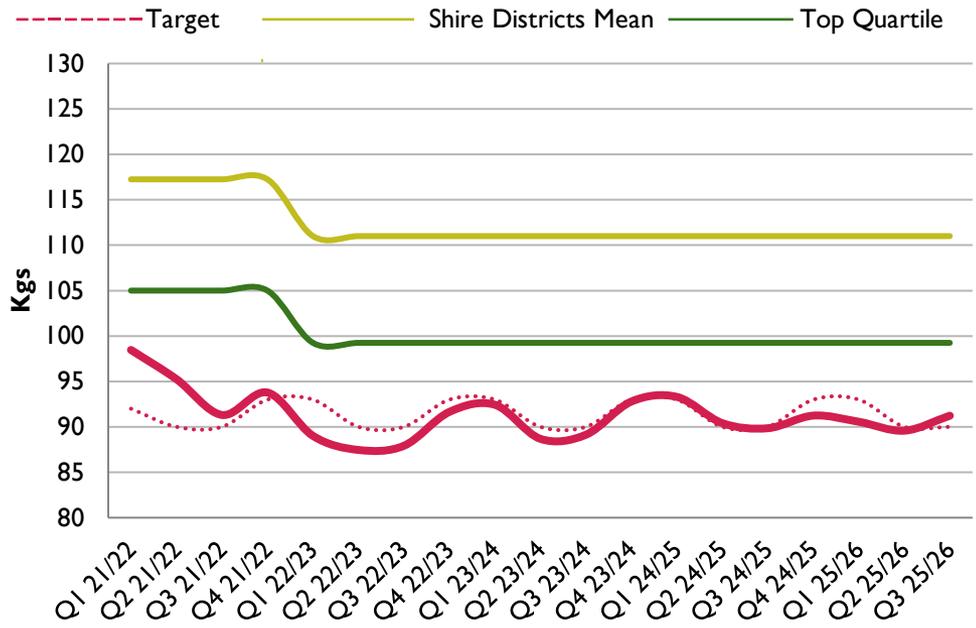
2023-24 Benchmark	%	County Rank	Quartile
South Oxfordshire	62.9%	1/5	Top
Vale of White Horse	60.7%	2/5	Top
West Oxfordshire	57.2%	3/5	Second
Cherwell	53.2%	4/5	Third
Oxford	48.3%	5/5	Bottom

During Q3, the household recycling rate fell by around 1.5% compared with the same period last year. The current performance sits at 55.72%, below the Council's 62% target.

Nationally, recycling rates vary significantly. In 2023/24, local authorities in England recorded household recycling rates ranging from 15.8% to 62.9%, with the provisional national average at 42.2%. This wider context highlights the substantial performance gap between leading and lower-performing authorities. Within this landscape, West Oxfordshire performed strongly, ranking 16th out of 197 waste collection authorities in England for 2023–2024, achieving a household recycling rate of 57.2%. This places it among the top councils nationally and reflects continued commitment to high recycling performance across Oxfordshire.

Despite being below target, the Council's current rate of 55.72% remains significantly higher than the national average and consistent with the strong regional performance across Oxfordshire, where all district councils continue to perform well above national levels.

Residual Household Waste per Household (kg)



Direction of Travel

- Against last Quarter 
- Against last Year 

Increased since last quarter and last year

Lower is Good

Target	90
Actual	91.23

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How do we compare?

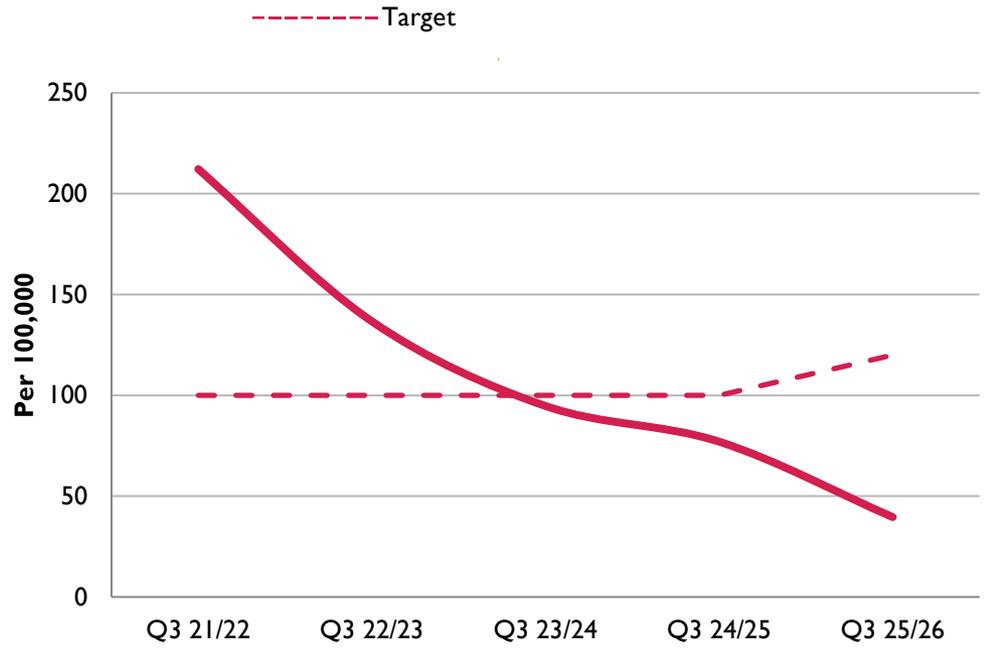
Residual household waste per household (kg/household) – Gov.uk. The latest dataset available is from 2023-2024.

2023-24 Benchmark	Kg	County Rank	Quartile
Vale of White Horse	303.2	1/5	Top
South Oxfordshire	304.8	2/5	Top
Oxford	335.7	3/5	Second
West Oxfordshire	344.7	4/5	Third
Cherwell	396.9	5/5	Bottom

Residual household waste per household is currently 91.23kg, sitting just above the 90kg target. This slight rise is expected at this point in the year, as the Christmas period typically leads to increased waste generation due to higher packaging, food waste and seasonal consumption. Despite this seasonal uplift, overall performance remains close to target, and levels are expected to stabilise as post-Christmas waste patterns normalise.

Missed bins per 100,000

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Direction of Travel

Against last Quarter 

Against last Year 

Decreased since last quarter and last year

Lower is Good

Target	120
Actual	39.62

Missed bins fell to 39.62 per 100,000, remaining comfortably within target, and overall service performance has improved following recent measures. While December saw more service failures due to ageing fleet issues with procurement of new vehicles is underway, with food waste vehicles nearly finalised. Despite these pressures, communication remains excellent, misses have continued to fall, service failures are at their lowest level in years, and recovery times have improved, with 90% of failures resolved within 24 hours.

Number of visits to the leisure centres & (Snapshot) Number of gym memberships

Direction of Travel

Gym Memberships

Against last Quarter 

Against last Year 

Leisure Visits

Against last Quarter 

Against last Year 

Higher is Good

Gym Memberships

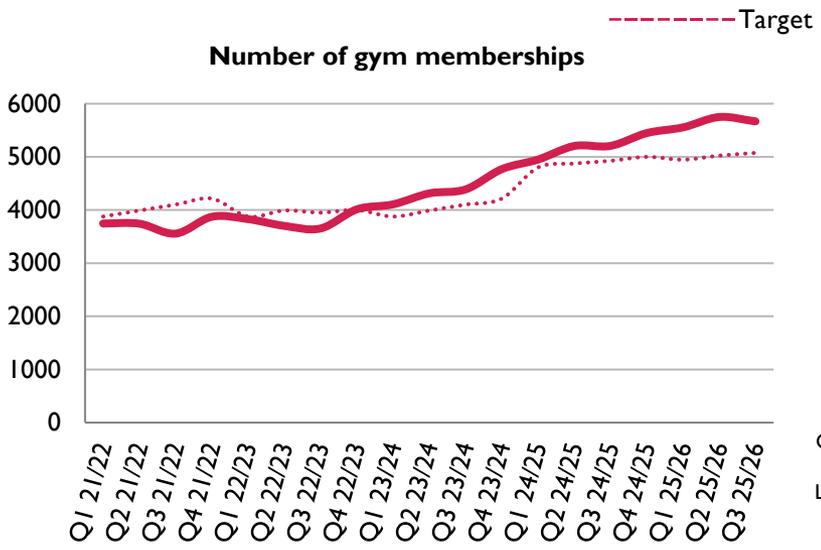
Target	5,075
Actual	5,668

Leisure Visits

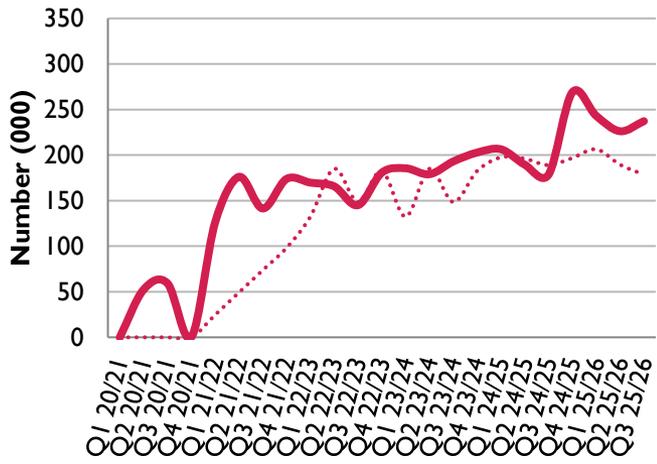
Target	178,574
Actual	237,216

Gym Memberships – Slightly declined since last quarter but increased since last year
Leisure Visits- Increased since last quarter and last year

Number of gym memberships



Visits to leisure facilities



The Council exceeded its leisure targets in Q3, achieving 11.7% above target for memberships and 32.8% above target for visits, demonstrating strong public engagement with its facilities.

Breakdown of Leisure Visits per facility:

Facility	Q1 24-25	Q2 24-25	Q3 24-25	Q4 24-25	Q1 25-26	Q2 25-26	Q3 25-26
Bartholomew Sports Centre	9,681	9,747	5,506	16,712	20,268	17,195	23,301
Carterton Artificial Turf Pitch	6,840	6,840	6,840	9,252	2796	1810	2796
Carterton Leisure Centre	70,220	62,866	57,100	64,139	57,346	63,254	62,869
Carterton Pavilion	600	600	600	600	400	320	600
Chipping Norton Leisure Centre	22,907	21,717	18,804	54,713	47,750	40,080	52,563
Windrush Leisure Centre	76,286	65,250	73,237	103,947	95,596	81,676	69,235
Witney Artificial Turf Pitch	19,320	19,320	16,487	19,640	19,557	15,724	25,852
Woodstock Open Air Pool	516	3,126	0	0	1,137	6,143	0

Where no access controls are in place, such as at Carterton Pavilion, usage is estimated by multiplying the number of pitch bookings for the quarter by the typical number of players per booking.

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 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>PROPOSED AMENDMENTS TO GOVERNANCE AGREEMENTS AND EXTENSION OF SERVICE AGREEMENTS</p>
<p>Wards affected</p>	<p>None</p>
<p>Accountable member</p>	<p>Andy Graham - Leader of the Council Email: andy.graham@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Giles Hughes - Chief Executive Email: giles.hughes@westoxon.gov.uk</p>
<p>Report author</p>	<p>Frank Wilson - Managing Director (Publica) Email: frank.wilson@publicagroup.uk</p>
<p>Summary/Purpose</p>	<p>The purpose of this report is for the Executive to consider proposals for amendments and an extension to governance arrangements following the conclusion of the Publica Review. This includes the updating of service specifications, service agreements, the members agreement and articles of association.</p>
<p>Annexes</p>	<p>NONE</p>
<p>Recommendation(s)</p>	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> 1. Approve in principle the changes to the governance agreements set out in section 3 below. 2. Delegate authority to the Chief Executive, in consultation with the Leader, to finalise and enact through appropriate legal documentation, the detailed changes to the agreements, in line with principles agreed.
<p>Corporate priorities</p>	<ul style="list-style-type: none"> • Putting Residents First • Working Together for West Oxfordshire
<p>Key Decision</p>	<p>YES</p>

Exempt	NO
Consultees/ Consultation	Publica Board Council Management Teams Shareholder Forum (Leaders) Officer Transition Board (CEO's, s.151 officers and Publica reps) Publica Transition Legal Workstream (Monitoring Officers & Legal)

1. EXECUTIVE SUMMARY

- 1.1** The arrangements for shared service provision within the Publica partnership have been subject to a significant level of change over the last two years as a consequence of the Publica Review. There has been significant change to the company board structure with new Non-Executive Directors appointed including council officer representation, and a slimmed down Publica Executive structure reflecting the reduced service provision to partners.
- 1.2** The changes set out in this report provide for an updated set of governance arrangements to support the service changes post the Publica review, clarifying roles and responsibilities, and revising service specifications to reflect current provision. The changes also provide both certainty and the necessary flexibility as we move towards local government reorganisation.
- 1.3** The approved changes will be legally enacted most efficiently through deeds of variation to the original documentation rather than requiring full replacement documentation, where possible, thereby minimising any legal costs.

2. BACKGROUND

- 2.1** The governance documents that support the delivery of services by Publica were approved prior to its launch in 2017. These documents outlined arrangements for managing the company and its service delivery for all partners. For three of the partners (Cotswold, Forest of Dean and West Oxfordshire) this included three separate service specifications relating to Support Services, General Services and Commissioning. Cheltenham only took Support Services and as such, have one service specification. These service agreements all had different timelines associated with them.
- 2.2** The Publica Review has fundamentally changed the nature of the service offering from Publica to its shareholding councils such that three separate contracts are no longer necessary. Having paused any further significant changes to the Publica service offer prior to determining Publica's future as part of Local Government Reorganisation (LGR), the shareholders requested that Publica review and update the governance documents to reflect the current position in terms of service delivery and to prepare for LGR.
- 2.3** In recognition of the changing specifications since the commencement of the Publica Review, the partners have been operating on a range of side letters to accommodate these changes and indeed, expiring service agreements timelines. It was agreed that revising the agreements at this stage was sensible to provide certainty for councils and employees whilst retaining flexibility as we move towards LGR.

2.4 Cheltenham BC have recently extended their service agreement (not impacted by the Publica Review) until 31 October 2030 as accommodated for within the original agreements.

2.5 The key agreements that have proposed changes within this report are:

- Articles of Association
- Members Agreement
- Services Agreements
- Services Specifications

3. SUMMARY OF THE MAIN CHANGES TO GOVERNANCE DOCUMENTS

3.1 The key changes required in the documents are set out below. These changes have been considered in detail by the Shareholder Forum where the council is represented by the Leader and Chief Executive.

Articles of Association

3.2 Some very minor changes are proposed to largely reflect current practice: -

- clarifying that annual distributions or surpluses are permitted and that this does not require prior shareholder approval
- removing reference to the dormant companies (now dissolved)
- removal of the requirement to annually renew the Chair of the Boards appointment (the three-year term remains unaltered as does the ability to remove the Chair within the term)

Members Agreement

3.3 Relatively minor changes are proposed reflecting current practice. It is proposed that these changes are enacted by a deed of variation.

- Clarifying that surpluses can be distributed annually
- Clarifying that members will fund the consequences of any decisions that they have made (as they did in respect of the Publica Review) subject to decision making unanimity
- Clarifying the timelines for the annual business plan – reflecting a more appropriate timeline that matches council and Publica budget processes

Services Agreement

3.4 The Services Agreement has more significant changes specifically to deal with the merging of three separate specifications into one. There is now one specification of 'services', removing Commissioning Services and General Services. There is also an amendment to create a

single agreement end date of 31 October 2030. This aligns with the date used by Cheltenham which provides continuity should any new unitary authority want to continue with the model, or undertake a phased shutdown, whilst retaining flexibility for termination earlier, if necessary, in the run up to reorganisation.

3.5 There has also been some general updating to pick up changes in legislation such as GDPR and changes to clauses to reflect how the agreement works in practice rather than originally specified.

3.6 A summary of the changes is set out below: -

- Definitions updated and a revised expiry date / extension opportunity to protect new unitary options
- updating of section on notices to reflect current addresses and methods
- updating of payments processes and timings to reflect actual practical arrangements that have been in use since Publica was formed
- updating quality control arrangements to reflect the current position
- updating of relevant insurance provisions to reflect what is procured in partnership with the councils
- clarification about what is included within the annual report
- a revised service specification (see below)
- a revised communications protocol to clarify role of Member Representative Board (Shareholder Forum) and Client Office Group (Operational Forum)

Service Specification

3.7 Revised service specifications are provided (one for each council) setting out the services now provided post phases 1 and 2 of the Publica Review. These follow the same format and level of detail in the original documents but are rewritten to reflect current service provision and there is one for each partner council. These are supported by detailed service plans for each service area which are provided to the council management teams.

3.8 The specifications will be live documents and reflect any further changes that occur should councils further amend service provision. Any such amendments will be reported through the regular quarterly financial performance reports.

4. ALTERNATIVE OPTIONS

4.1 The council could continue to operate the arrangements with Publica under side letter but this would fail to provide clarity of revisions to roles and responsibilities and the service specification after the Publica Review.

5. FINANCIAL IMPLICATIONS

- 5.1** There are no direct implications from the approval of the revised governance arrangements set out in this report.
- 5.2** The Publica budget and revised costing model outcomes have been included within the new year budget. Where any changes to service provision is made 'in year' these are subject to contract variations and budgets amended with close dialogue between the Publica and council finance teams

6. LEGAL IMPLICATIONS

- 6.1** It is anticipated that the legal execution of the changes to the documents will be conducted, where possible, by deed of variation and will be carried out by the in-house legal team. Whilst the legal team does act on behalf of both parties no conflicts of interest are anticipated as the changes have been agreed by all parties.

7. RISK ASSESSMENT

- 7.1** Updating of these agreements seeks to minimise risk to the council moving forward by providing greater clarity in roles and responsibilities moving forward.
- 7.2** The documents seek to provide certainty to the councils that service provision will continue, provides certainty to Publica and its employees that contractual arrangements remain in place, whilst providing flexibility for the council or its successor to retain or amend the arrangements as necessary.

8. EQUALITIES IMPACT

- 8.1** There are no impacts of these changes under equality legislation.

9. SUSTAINABILITY IMPLICATIONS

- 9.1** There are no impacts on sustainability matters through approval of these governance changes.

10. BACKGROUND PAPERS

- 10.1** The following documents have been identified by the author of the report in accordance with section 100D.5(a) of the Local Government Act 1972 and are listed in accordance with section 100 D.1(a) for inspection by members of the public:
 - None.

(END)

 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE - 11 MARCH 2026.</p>
<p>Subject</p>	<p>UBICO LTD SERVICE AGREEMENT</p>
<p>Wards affected</p>	<p>All</p>
<p>Accountable member</p>	<p>Andy Graham - Leader of the Council Andy.Graham@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Phil Martin - Director of Place Email: Phil.Martin@westoxon.gov.uk</p>
<p>Report author</p>	<p>Si Pocock-Cluley - Environment Services and Waste Transformation Lead Email: si.pocock-cluley@westoxon.gov.uk</p>
<p>Summary/Purpose</p>	<p>The proposal is to move to a single, common service agreement to be adopted by all Ubico shareholder councils and effective from April 2027, with council-specific service specifications appended. This approach will secure the delivery of service beyond the current contract end date on March 2027, retain local flexibility over service scope and standards and introduce consistency in legal structure, definitions, and core contractual provisions across the Ubico Shareholding partnership.</p> <p>The proposed agreement updates terminology, reflects legislative change, standardises notice periods, and includes specific provisions to ensure continuity of services in the event of local government reorganisation. Importantly, it does not change the Shareholder Agreement or the Council's role as an owner of Ubico.</p> <p>Adoption of the common Service Agreement will provide greater clarity, resilience and long-term planning certainty while retaining strong council control over service scope, cost and performance, within the existing shareholder governance framework.</p>

Annexes	Annex A - Sustainability Impact Assessment
Recommendation(s)	<p>That the Executive resolves to:</p> <ol style="list-style-type: none"> 1. Approve the Ubico Service Agreement in principle. 2. Delegate authority to Director of Place in consultation with The Leader of the Council, to: <ol style="list-style-type: none"> a. Agree and approve the final wording of the Service Agreement before the current contract expires at the end of March 2027. b. Agree and approve the final wording of the Lease Agreement c. Agree and approve the updated Service Specification
Corporate priorities	<ul style="list-style-type: none"> • Putting Residents First • A Good Quality of Life for All • A Better Environment for People and Wildlife • Responding to the Climate and Ecological Emergency • Working Together for West Oxfordshire
Key Decision	NO
Exempt	NO
Consultees/ Consultation	<p>WODC Environmental Services and Waste Team WODC Climate Team WODC Finance Legal Services Ubico Ltd</p>

1. EXECUTIVE SUMMARY

- 1.1** Each Ubico shareholder council currently operates under its own service agreement, originally derived from a 2012 template and subsequently amended at different points in time. These agreements have varying end dates and wording, creating inconsistency and unnecessary complexity across the shareholder group.
- 1.2** It is important to distinguish clearly between the Ubico Shareholder Agreement and the Ubico Service Agreement, as they serve different but complementary purposes.
- 1.3** The Shareholder Agreement governs how Ubico operates as a company: it sets out ownership, governance, voting rights, reserved matters, and the relationship between Ubico and its shareholder councils in their capacity as owners. It does not specify what services are delivered, to what standard, or at what cost.
- 1.4** By contrast, the Service Agreement governs how services are delivered to an individual council: it defines the services commissioned, performance standards, cost recovery arrangements, notice provisions, and the respective responsibilities of the Council and Ubico in relation to day-to-day service delivery. The Service Agreement therefore provides the contractual mechanism through which the Council controls what Ubico delivers on its behalf.
- 1.5** The proposal is to move to a single, common service agreement to be adopted by all Ubico shareholder councils and effective from April 2027, with West Oxfordshire District Council - specific Vehicle Leasing agreements and Service Specifications appended. This approach will secure the delivery of service beyond the current contract end date on March 2027, retain local flexibility over service scope and standards and introduce consistency in legal structure, definitions, and core contractual provisions across the Ubico Shareholding partnership.
- 1.6** The proposed agreement updates terminology, reflects legislative change, standardises notice periods, and includes specific provisions to ensure continuity of services in the event of local government reorganisation. Importantly, it does not change the Shareholder Agreement or the Council's role as an owner of Ubico.
- 1.7** Adoption of the common Service Agreement will provide greater clarity, resilience and long-term planning certainty while retaining strong council control over service scope, cost and performance, within the existing shareholder governance framework.

2. BACKGROUND

- 2.1** WODC currently receives frontline environmental services from Ubico under a service agreement that expires on 31 March 2027.
- 2.2** Similar arrangements exist across the Ubico shareholder group, although contract end dates and detailed terms vary between councils.
- 2.3** Over time, incremental amendments have resulted in divergence between agreements. Shareholders have therefore agreed to develop a modernised, common agreement that reflects current practice, updated legislation, and the strategic direction of the company and its owners.

3. Proposed Common Service Agreement

- 3.1** The proposed agreement establishes a single contractual framework governing the relationship between Ubico and each shareholder council. It confirms Ubico's role as a council-owned delivery vehicle operating on a cost-recovery basis, with no profit margin, and with services commissioned and overseen by the Council through agreed specifications and governance mechanisms.
- 3.2** Each council will continue to have its own lease agreement and service specification appended to the agreement, ensuring local flexibility within a consistent legal structure.

4. Term, Notice and Continuity

- 4.1** The current agreement has a fixed end date of March 2027, this cut-off date requires the Council to take specific additional action to either enter into a new agreement with Ubico or go to market for a new provider.
- 4.2** The proposed agreement has no fixed expiry date but instead introduces a standard provision allowing either party to terminate on not less than 24 months' notice, unless a shorter period is mutually agreed. This provides greater certainty for service planning and investment while retaining protections for breach, default or force majeure.
- 4.3** New clauses also address local government reorganisation (LGR), ensuring that any successor authority automatically inherits the rights and obligations of the Council, thereby protecting service continuity for residents.

5. Environment

- 5.1** Specific obligations are included with regard to the Environment Act 2021 and the Natural Environment and Rural Communities Act 2006, detailing how Ubico shall support the Council in fulfilling their biodiversity duty in the exercise of council functions.

6. Governance, Performance and Financial Control

- 6.1** The agreement strengthens governance through:
- Annual service planning and review
 - Transparent cost recovery and reconciliation
 - Performance monitoring against agreed specifications
 - Audit, information and inspection rights
- 6.2** These provisions ensure that WODC retains strategic control while Ubico remains responsible for operational delivery.

7. ALTERNATIVE OPTIONS

- 7.1** Do nothing – Retain the existing WODC-specific agreement.
- This would perpetuate inconsistency across shareholders and require a separate renegotiation for WODC by March 2027.
- 7.2** Re-procure services externally –
- This would introduce significant cost, risk and service disruption.

7.3 Neither option is recommended.

8. CONCLUSIONS

8.1 The proposed common Ubico Service Agreement provides a robust, modern and flexible framework for continued delivery of frontline environmental services. It improves consistency, strengthens governance, and supports long-term service resilience while retaining council control

8.2 Crucially, the agreement responds to the uncertainty linked to Local Government Reorganisation and provides WODC with the adaptable framework needed to deliver the ambitions of the Waste Transformation Programme.

8.3 Approval is recommended.

9. FINANCIAL IMPLICATIONS

9.1 The agreement does not commit the Council to fixed expenditure beyond existing service arrangements. Annual service costs will continue to be agreed through the business planning and budget setting process. There is no profit margin, and costs are transparently recharged on a full cost- recovery- basis.

10. LEGAL IMPLICATIONS

10.1 The agreement has been developed with legal input and is structured to operate as a compliant in-house (Teckal) arrangement. It reflects current legislative requirements and provides appropriate protections for the Council.

11. RISK ASSESSMENT

11.1 Key risks include service disruption at contract expiry and uncertainty arising from local government reorganisation. These risks are mitigated through the proposed common agreement, extended notice provisions, and successor authority clauses.

12. EQUALITIES IMPACT

12.1 The agreement relates to service delivery arrangements and does not introduce changes that would have a differential impact on protected groups. An Equalities Impact Assessment has been completed.

13. SUSTAINABILITY IMPLICATIONS

13.1 The agreement supports long- term planning, fleet investment and service efficiencies, contributing to reduced environmental impact and alignment with the Council's climate and environmental objectives. A Sustainability Impact Assessment has been completed as part of implementation.

13.2 The Sustainability Impact Assessment is included in Annex A

14. BACKGROUND PAPERS

14.1 The following documents have been identified by the author of the report in accordance with section 100D.5(a) of the Local Government Act 1972 and are listed in accordance with section 100 D.1(a) for inspection by members of the public:

None.

14.2 These documents will be available for inspection online at www.westoxon.gov.uk or by contacting democratic services democratic.services@westoxon.gov.uk for a period of up to 4 years from the date of the meeting.

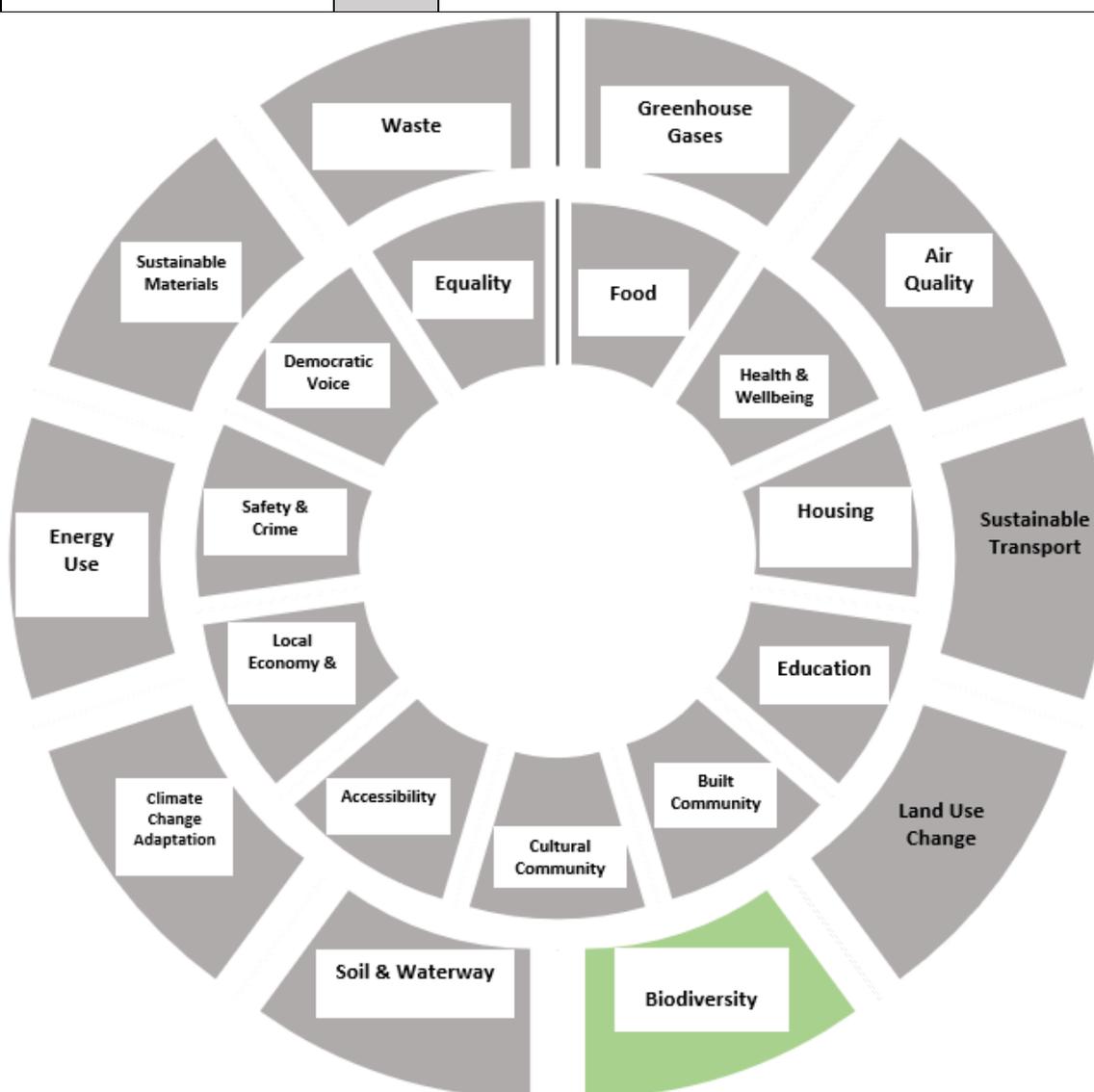
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Ubico Ltd Service Agreement SIAT

The proposal is to move to a single, common service agreement to be adopted by all shareholder councils and effective from April 2027, with council specific service specifications appended. This approach retains local flexibility over service scope and standards while introducing consistency in legal structure, definitions, and core contractual provisions. The proposed agreement updates terminology, reflects legislative change, standardises notice periods, and includes specific provisions to ensure continuity of services in the event of local government reorganisation. Importantly, it does not change the Shareholder Agreement or the Council's role as an owner of Ubico. Adoption of the common Service Agreement will provide greater clarity, resilience and -specific service specifications appended. This approach retains local flexibility over service scope and standards while introducing consistency in legal structure, definitions, and core contractual provisions. The proposed agreement updates terminology, reflects legislative change, standardises notice periods, and includes specific provisions to ensure continuity of services in the event of local government reorganisation. Importantly, it does not change the Shareholder Agreement or the Council's role as an owner of Ubico. Adoption of the common Service Agreement will provide greater clarity, resilience and long planning certainty while retaining strong council control over service scope, cost-term planning certainty while retaining strong council control over service scope, cost and performance, within the existing shareholder governance framework.

Criteria	Score	Justification
Energy Use	0	The revised service agreement will not have a direct impact on Environmental impacts.
GHGs	0	The revised service agreement will not have a direct impact on Environmental impacts.
Air quality	0	The revised service agreement will not have a direct impact on Environmental impacts.
Land use change	0	The revised service agreement will not have a direct impact on Environmental impacts.
Soil and waterway health	0	The revised service agreement will not have a direct impact on Environmental impacts.
Waste	0	The revised service agreement will not have a direct impact on Environmental impacts.
Sustainable Transport	0	The revised service agreement will not have a direct impact on Environmental impacts.
Biodiversity	2	The revised service agreement specifically supports delivery of the Council's defined Biodiversity targets and statutory commitments
Climate Change Adaptation	0	The revised service agreement will not have a direct impact on Environmental impacts.
Sustainable Materials	0	The revised service agreement will not have a direct impact on Environmental impacts.
Food	0	The revised service agreement will not have a direct impact on Social impacts.
Health	0	The revised service agreement will not have a direct impact on Social impacts.
Housing	0	The revised service agreement will not have a direct impact on Social impacts.

Education	0	The revised service agreement will not have a direct impact on Social impacts.
Built Community	0	The revised service agreement will not have a direct impact on Social impacts.
Cultural Community	0	The revised service agreement will not have a direct impact on Social impacts.
Accessibility	0	The revised service agreement will not have a direct impact on Social impacts.
Local Economy and Jobs	0	The revised service agreement will not have a direct impact on Social impacts.
Safety	0	The revised service agreement will not have a direct impact on Social impacts.
Democratic Voice	0	The revised service agreement will not have a direct impact on Social impacts.
Equity	0	No impacts on groups with protected characteristics.



 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>EXECUTIVE – 11 MARCH 2026.</p>
<p>Subject</p>	<p>LOCAL GOVERNMENT REORGANISATION STATUTORY CONSULTATION</p>
<p>Wards affected</p>	<p>All</p>
<p>Accountable member</p>	<p>Leader of the Council: Councillor Andy Graham Email: andy.graham@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Chief Executive Officer, Giles Hughes Email: giles.hughes@westoxon.gov.uk</p>
<p>Report author</p>	<p>Astrid Harvey, Senior Policy Adviser – LGR and Devolution Email: astrid.harvey@westoxon.gov.uk</p>
<p>Summary/Purpose</p>	<p>To seek delegated authority for the Chief Executive, in consultation with the Leader of the Council, to submit a response to the Government’s statutory consultation on the three proposed options submitted for Local Government Reorganisation for Oxfordshire and West Berkshire including:</p> <ul style="list-style-type: none"> - One Unitary Council covering the whole area of Oxfordshire - Two Unitary Councils: Oxford and Shires (comprising current areas of Cherwell District, Oxford City and West Oxfordshire District) and Ridgeway (comprising current areas of South Oxfordshire District, Vale of White Horse District and West Berkshire) - Three Unitary Councils which includes a request to split existing district council areas between the three proposed new councils comprising the current areas of: Greater Oxford Council (Oxford City plus 15 parishes from Cherwell, 25 parishes from South Oxfordshire and 9 parishes from Vale of White Horse), Northern Oxfordshire Council (Cherwell less 15 parishes and West Oxfordshire), and Ridgeway Council (South Oxfordshire less 25 parishes, Vale of White Horse less 9 parishes, plus West Berkshire)
<p>Annexes</p>	<p>None</p>

Recommendation(s)	<p>That the Executive resolves to:</p> <p>I. Delegate authority to the Chief Executive Officer, in consultation with the Leader of the Council, to submit a response to the Government’s statutory consultation on Local Government Reorganisation for Oxfordshire and West Berkshire on behalf of West Oxfordshire District Council.</p>
Corporate priorities	<ul style="list-style-type: none"> • Putting Residents First • A Good Quality of Life for All • A Better Environment for People and Wildlife • Responding to the Climate and Ecological Emergency • Working Together for West Oxfordshire
Key Decision	NO
Exempt	NO
Consultees/ Consultation	<p>In response to government’s request to promote the statutory consultation on Local Government Reorganisation for Oxfordshire and West Berkshire, the Council, alongside other affected authorities, has run a comprehensive campaign to encourage informed participation.</p> <p>An extensive engagement programme has invited meetings with government’s named consultees along with local stakeholder engagement (Town and Parish Councils, local businesses and community groups), a Town and Parish Forum and drop-in sessions in Witney and Chipping Norton.</p>

1. EXECUTIVE SUMMARY

- 1.1** In response to the Secretary of State's invitation to councils in Oxfordshire to submit proposals for unitary local government for Oxfordshire, three proposals for local government reorganisation for Oxfordshire and West Berkshire were submitted to the Ministry of Housing, Communities and Local Government (MHCLG) on 28 November 2025.
- 1.2** MHCLG is now seeking views on the proposals received through a statutory consultation which runs from 5 February 2026 to 26 March 2026.
- 1.3** West Oxfordshire District Council is a named consultee for the purposes of this statutory consultation and therefore is invited to submit a response on the following proposals for unitary local government for Oxfordshire and West Berkshire:

One Unitary Council covering the whole area of Oxfordshire

Two Unitary Councils: Oxford and Shires (comprising current areas of Cherwell District, Oxford City and West Oxfordshire District) and Ridgeway (comprising current areas of South Oxfordshire District, Vale of White Horse District and West Berkshire)

Three Unitary Councils which includes a request to split existing district council areas between the proposed new councils comprising the current areas of: Greater Oxford Council (Oxford City plus 15 parishes from Cherwell, 25 parishes from South Oxfordshire and 9 parishes from Vale of White Horse), Northern Oxfordshire Council (Cherwell less 15 parishes and West Oxfordshire), and Ridgeway Council (South Oxfordshire less 25 parishes, Vale of White Horse less 9 parishes, plus West Berkshire)

2. BACKGROUND

- 2.1** Council unanimously voted on 12 November 2025 (35 for, 0 against and 1 abstention) in support of the submission of a full proposal for a two unitary model based on one new unitary council covering the entire existing boundaries of West Oxfordshire and Cherwell District Councils and Oxford City Council, with a working title of 'Oxford & Shires' and a second new unitary council covering the entire existing boundaries of South Oxfordshire and Vale of White Horse District Councils and West Berkshire Council, with the working title of 'Ridgeway'.
- 2.2** Executive subsequently unanimously approved submission of the full proposal for a two unitary model and this was submitted to government on 28 November 2025.
- 2.3** MHCLG has commenced a 7 week consultation on the three proposals submitted for Oxfordshire, to close on 26 March 2026. The Council is a named consultee invited to submit a response to the consultation.
- 2.4** Consistent with the decisions by Council and Executive in November 2026, a response will be submitted in support of the two unitary model and in response to the two alternative

proposals submitted for Local Government Reorganisation for Oxfordshire and West Berkshire.

3. CONSULTATION AND ENGAGEMENT

3.1 MHCLG has also requested the Council promote the statutory consultation on Local Government Reorganisation for Oxfordshire and West Berkshire. The Council, alongside other affected authorities, has run a comprehensive campaign to encourage informed participation with a defined list of named consultees through invited discussions about the proposals under consultation.

3.2 An extensive engagement programme has promoted the consultation across a range of platforms. Local stakeholder engagement has encouraged responses from local businesses and community groups through drop-in sessions in Witney and Chipping Norton and a focussed Town and Parish Forum has supported the participation of Town and Parish Councils in the consultation.

4. ALTERNATIVE OPTIONS

4.1 The Executive could decide not to submit a consultation response to the statutory consultation for Local Government Reorganisation in Oxfordshire and West Oxfordshire.

4.2 To do so would be inconsistent with the formal decisions taken in November 2025 to support and submit the proposal for a two unitary model for Local Government Reorganisation in response to the Secretary of State's formal invitation to do so.

5. FINANCIAL IMPLICATIONS

5.1 None

6. LEGAL IMPLICATIONS

6.1 Although there is no legal obligation for the Council as a named consultee to respond to this consultation it presents a further opportunity for the Council to influence a decision of significant local effect.

7. RISK ASSESSMENT

7.1 Should the Executive decide not to submit a consultation response to the statutory consultation as a named consultee it would risk the Council's ability to influence the government's decision making process on Local Government Reorganisation for Oxfordshire and West Berkshire. This would be inconsistent with the unanimous decision at Full Council and Executive in November 2025 to support the submission of a two unitary model for Oxfordshire and West Berkshire through the government's Local Government Reorganisation programme.

8. EQUALITIES IMPACT

8.1 The statutory consultation on Local Government Reorganisation is conducted by Ministry of Communities, Housing and Local Government who are also the body responsible for risk

assessment of the consultation. They state on the consultation portal that ‘An impact assessment has not been prepared for this consultation as it will only affect local government in Oxfordshire and so there will be no direct regulatory, economic or social impacts.’

9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 9.1 The submission of a response to the statutory consultation on Local Government Reorganisation for Oxfordshire and West Oxfordshire does not in itself have a climate impact.
- 9.2 The role of the proposed two unitary model submitted and subject to the consultation has had due regard for enabling future structures for Local Government to continue taking effective action towards the climate and ecological emergency once implemented.

10. BACKGROUND PAPERS

- 10.1 None

(END)

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