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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 three separate public consultations to date:
- I.4 In August 2022, an initial scoping consultation took place, seeking general views on the potential areas of focus for the new Local Plan.
- I.5 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.
- I.6 Recently, we undertook a third consultation, seeking views and opinions on the draft 'Preferred Policy Options Paper'.
- I.7 The purpose of this report is to provide a detailed overview of the third consultation including how and when it took place and the main messages arising from the responses that we received.
- I.8 The responses to all three previous consultation stages will be taken into account by Officers as they prepare the final Regulation 19 draft version of the Local Plan in early 2026.

Consultation Overview

- 2.1 The Preferred Policy Options Consultation was held over a 6-week period from 26th June – 8th August 2025.
- 2.2 We asked for your views on:
 - **The overall structure and content of the emerging Local Plan**
 - **The proposed vision and objectives**
 - **The preferred policy options**
- 2.3 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.
- 2.4 Public Exhibitions:
 - Bampton Public Exhibition – 1st July 2025
 - Long Hanborough Public Exhibition – 2nd July 2025
 - Chipping Norton Public Exhibition – 7th July 2025
 - Carterton Public Exhibition – 8th July 2025
 - Burford Public Exhibition – 14th July
 - Woodstock Public Exhibition – 15th July 2025
 - Eynsham Public Exhibition – 16th July 2025
 - Witney Public Exhibition – 22nd July 2025
 - Charlbury public Exhibition – 23rd July 2025
- 2.5 The consultation generated a total of almost 1,500 comments from around 400 individuals and organisations.
- 2.6 The sections below summarise the comments that we received in relation to each aspect of the draft Preferred Policy Options Paper.

Draft Preferred Policies

Introduction

- 3.1 Comments suggest broad support for the six revised objectives, especially those focused on climate action, community wellbeing, and protecting the natural environment, however, many respondents feel the vision is vague, lacks realism, and is not backed by clear implementation plans with calls for a full viability assessment to ensure policies are realistic and enforceable. Comments suggest worries that developer-led assessments may be inadequate or misleading.
- 3.2 Concerns are raised that the 268-page document is seen as too long and complex for meaningful public engagement and there are suggestions for a clear executive summary and simplified language. Many feel the process is confusing, inaccessible, and not transparent, especially for elderly or digitally excluded residents.
- 3.3 Recommendations include improving consultation tools and accessibility and clarifying definitions (e.g. “major development”, “medium-scale”) and success metrics. Calls are made for proactive outreach to businesses, communities, and residents.
- 3.4 Comments suggest frustration over the lack of site-specific information in the current consultation and call for the preferred development sites to be published before finalising policies.
- 3.5 Comments indicate strong opposition to placing villages like Combe, Ascott-under-Wychwood, Fulbrook, and Filkins in Tier 3, which allows for medium-scale development (up to 300 homes) with many arguing that these villages lack the infrastructure and services to support such growth and are often within protected landscapes (CNL).
- 3.6 Linked to this, other comments highlight concerns that development in rural areas will increase car dependency, undermining climate goals.
- 3.7 There are mixed views about the feasibility of rail proposals (e.g. Carterton–Oxford line) with some calls for a focus on better bus services instead.
- 3.8 There are repeated concerns about sewage, roads, public transport, and healthcare being overstretched, with calls for infrastructure to be legally secured or delivered before housing and not after. Specific issues have been highlighted in Aston, South Leigh, and Witney, where promised upgrades have not materialised.
- 3.9 Calls for housing to be genuinely affordable, linked to local incomes and not market rates have been made, with support for rural exception sites and public housebuilding to meet local needs.
- 3.10 Concerns are raised over second homes and Airbnbs reducing housing availability.

- 3.11 There is strong support for protecting the Cotswolds National Landscape, ancient woodlands (e.g. Pinsley Wood), and river systems (e.g. Windrush, Evenlode) with requests for stronger wording in policies to ensure actual protection and enhancement, not just aspiration.
- 3.12 Some concerns are expressed that in relation to smaller sites, the amount of documentation/studies that is required, particularly at the outline application stage, is likely to significantly hinder new developments coming forward.
- 3.13 **Key matters arising from feedback:**
- **Many comments indicate that medium scale development (up to 300 houses) is not appropriate in Tier 3 settlements, particularly in the smaller villages**
 - **Many comments indicate concern that infrastructure cannot support more growth in many areas and there are calls for infrastructure to come before housing**

Background context

- 3.14 Comments suggest a number of concerns and recommendations for change in the Local Plan.
- 3.15 It is noted by some comments that the plan is behind schedule and adoption likely delayed to 2027. There are therefore calls to extend the plan period to 2043 to meet the required 15-year post-adoption horizon.
- 3.16 It is suggested by some comments that the plan's vision is seen as vague and overly general, making it hard for residents to engage meaningfully and, while the six objectives are broadly supported, there is frustration that they are not backed by clear implementation strategies or funding. This is highlighted in other comments which note that key supporting documents (e.g. Viability Assessment, Housing Land Availability) are still in progress and stress the need for viability testing to ensure policies are deliverable, not just aspirational.
- 3.17 This also relates to concerns about lack of cross-boundary coordination with other Oxfordshire councils.
- 3.18 Comments highlight a strong opposition to development in Tier 3 villages (e.g. Combe, Fulbrook, Ascott-under-Wychwood) with concerns that building too many new homes in these villages would overwhelm local infrastructure, increase car dependency (contradicting climate goals) and erode rural character and community wellbeing.
- 3.19 Many commenters noted a growing sense of frustration that residents' viewpoints and objections are being disregarded. They highlighted how planning processes lack meaningful engagement opportunities, which worsens perceptions of exclusion and undemocratic decision-making. Objections relate to the prioritisation of developers' interests over local concerns, lack of consultation on site allocations, and minimal involvement of elected representatives in community settings.

- 3.20 Comments suggest that this uncertainty around housing is having a negative impact on the mental health of residents and the community, with people reporting a sense of disruption, anxiety, and loss, not just resistance to change.
- 3.21 Many comments criticise infrastructure lagging behind development, particularly in regard to sewage systems, roads, and public transport being overstretched
- 3.22 LTCP5 goals (e.g. reducing car use) are seen as unrealistic in rural areas with poor public transport and cycling and walking are impractical in winter or hilly terrain. It is felt that residents feel pressured to use public transport that doesn't exist or isn't accessible.
- 3.23 Comments call for an emphasis on focusing development in sustainable locations (main service centres) rather than new settlements or small villages, with frustration with both strategic site selection and developers' slow delivery timelines and calls for a "use it or lose it" policy to prevent developers from land banking.
- 3.24 A comment from English Rural Housing Association (ERHA) highlights that rural areas need 50% more affordable homes than urban areas, citing that only 9% of housing in small villages is social housing (vs. 17% in urban areas). It is also suggested that planning policy must better support rural exception sites for local needs.
- 3.25 **Key matters arising from feedback:**
- **Comments note that the plan is behind schedule and adoption is likely to be delayed until 2027. There are therefore calls to extend the plan period to 2043 to meet the required 15-year post-adoption horizon**
 - **It is noted throughout of the plan that key documents, such as viability assessments, are not yet available yet are needed to ensure that development is deliverable**
 - **Comments suggest that residents are frustrated by the perception that their viewpoints and objections are being disregarded, with the planning process lacking meaningful engagement opportunities**
 - **There are many concerns that infrastructure is lagging behind development**

District Profile

- 3.26 Comments regarding the Climate and the Environment suggest strong support for WODC's declaration of a climate and ecological emergency. However, there are worries that central government's growth agenda may undermine local environmental goals.
- 3.27 Comments highlight criticism of sewage pollution in rivers like the Windrush, Evenlode, and Shill Brook, largely due to Thames Water's operations.
- 3.28 There are calls for greater protection and restoration of natural assets like Pinsley Wood, with a suggestion that it is given conservation status, and the Evenlode Valley, which are under threat from development and poor management. Comments suggest that the Evenlode Valley deserves equal protection to the Windrush Valley.

- 3.29 A recommendation to Include heritage and ecological protections in the Local Plan is made by one comment.
- 3.30 Comments suggest that air quality issues in Witney and Chipping Norton due to traffic congestion are underacknowledged.
- 3.31 Comments regarding housing and development suggest strong preference for brownfield development over greenfield sites. It is thought that green spaces are declining, especially in overdeveloped areas like Long Hanborough and that the mental and physical health benefits of nature must be valued and preserved.
- 3.32 There is some scepticism about developers delivering genuinely affordable housing and concerns about empty homes and properties used for Airbnb, reducing availability for residents.
- 3.33 A specific comment suggests that South Leigh should remain a Tier 4 village to avoid inappropriate development.
- 3.34 One comment highlights a criticism of “transactional” planning that overlooks ecological and community values.
- 3.35 Comments regarding infrastructure and services suggest that existing infrastructure (roads, sewers, traffic, public transport) is inadequate and overstretched. It is thought that further development without addressing these issues is seen as unsustainable.
- 3.36 A comment highlights that Salt Cross is cited as a potentially good model, but concerns remain about employment, education, and leisure provision.
- 3.37 Comments about transport suggest that rail services are overstated in the plan in that most towns lack direct access and that rail stations are oversubscribed, and many journeys still rely on cars.
- 3.38 There is a reflection that bus services are more relevant for local mobility and have improved post-COVID, with more frequent routes such as the Stagecoach S7 (Witney-Woodstock-Oxford Parkway) and the Pulhams H2 (Witney - Oxford Hospitals). Comments reflect the need to prioritise public transport investment to reduce car dependency.
- 3.39 **Key matters arising from feedback:**
- **Improve sustainable travel by improving bus services and cost and recognise the limitations of rail services**
 - **Prioritise environmental protection, such as protecting the county’s river from pollution, preserving woodland, such as Pinsley Wood and addressing air quality issues caused by traffic congestion**
 - **Build genuinely affordable and social housing, rescinding right to buy schemes and prioritising brownfield land**

- **Acknowledge infrastructure limitations**

Challenges and Opportunities for the Local Plan 2041

- 3.40 There is strong support for planned growth however deep concerns are highlighted regarding mass housebuilding over infrastructure and environmental concerns.
- 3.41 It is thought by many respondents that infrastructure (roads, sewage, public transport) is already inadequate in many areas like Witney, South Leigh, and Ascott-under-Wychwood and there are calls for infrastructure upgrades before any new development, especially sewage systems, which are currently overwhelmed and sometimes operating illegally. It is recommended that no development should proceed unless sewage treatment works are upgraded and legally compliant.
- 3.42 Some comments discuss doubts about the capacity of local councils (OCC and WODC) to deliver necessary infrastructure, citing the A40 improvements being negated by surrounding development and Salt Cross Garden Village's Park and ride being built without integrated road planning as being examples of poor planning coordination.
- 3.43 Comments suggest objections to Tier 3 village designations (e.g. Combe), which could lead to medium-scale developments (up to 300 units) in areas with historic and conservation significance with concerns that such growth would damage village character, overwhelm local services, and erode community wellbeing.
- 3.44 Concerns are also highlighted regarding environmental protection. There is widespread concern about the impact of development on the natural environment, especially the Cotswolds National Landscape (CNL) with the CNL Board supporting the plan but urging a shift from mere "protection" to active improvement of the natural environment.
- 3.45 There is criticism from some comments of solar farms on greenfield land with preference for rooftop solar panels on existing and new buildings and an emphasis on water quality and sewage management as key environmental priorities.
- 3.46 **Key matters arising from feedback:**
- **There are concerns that infrastructure is already inadequate in places, particularly the sewage system, and there are calls for infrastructure upgrades before new development**
 - **Genuinely affordable housing is called for**
 - **There is a suggestion that 'cycling and pedestrian' is changed to 'walking, wheeling and cycling' throughout the document (also in place of active travel).**

West Oxfordshire in 2041 – Our Vision

- 3.47 While many comments support the aspiration of the vision, praising it for its ambition, many feel it lacks realism and practicality, with scepticism about whether the vision will be upheld when pressured to meet housing targets (900+ homes/year).
- 3.48 There is widespread concern about overdevelopment, especially in villages where large housing projects are seen as disproportionate (e.g. 300 homes = 20.5% increase) with comments highlighting strained NHS services, poor public transport and cycling infrastructure and frustration regarding a lack of promised infrastructure, such as doctor's surgeries in new developments.
- 3.49 Comments suggest more emphasis is needed on ensuring adequate healthcare and care services before approving large-scale housing and a focus on current problems (roads, healthcare, water) to build trust and engagement.
- 3.50 There is also a desire for clearer, achievable goals and community services to accompany housing developments.
- 3.51 There are mixed views on climate action with some comments feeling that local efforts are futile without global cooperation (e.g. from the US, China, India).
- 3.52 Others suggest there is a strong sentiment that actions must be taken to combat global warming and support green initiatives but stress the need for realistic goals and government investment.
- 3.53 Strong support for protecting rivers, especially the River Windrush, with suggestions to adopt the Universal Declaration on the Rights of Rivers, following examples from Lewes and Hampshire.
- 3.54 **Key matters arising from feedback:**
- **There are many concerns about overdevelopment in the villages and inadequate infrastructure to support large developments.**
 - **There is strong support for protecting rivers, particularly the River Windrush**

Revised Draft Plan Objectives

- 3.55 Comments demonstrate that the revised draft Plan is widely supported, especially the six clear objectives, which are seen as an improvement over the previous thirty. Some commenters particularly emphasise the importance of objective 5.
- 3.56 There's a suggestion to include a statement of core values, such as evidence-based planning and decision-making, sustainable development (social, environmental, economic), community engagement and empowerment and equality of opportunity.

- 3.57 One comment suggests that given 33.9% of West Oxfordshire falls within the CNL, Objective 3 should explicitly reference the CNL. A proposed addition to Objective 3 is “Furthering the purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape.” The comment states that this aligns with the statutory duty of local authorities to protect the CNL.
- 3.58 **Key matters arising from feedback:**
- **The 6 objectives are seen as clear and widely supported, with comments preferring fewer objectives than previously suggested**
 - **Reference to the CNL is recommended in Objective 3 – see CNL Board comments for more detail**
 - **Further recommendations are suggested such as a Statement of Core Values**
- 3.59 **Objective 1 – To take local action and tackle the climate and ecological emergency ‘head-on’ for the benefit of current and future generations.**
- 3.60 Comments suggest broad support for the inclusion of climate change as a top strategic objective, with it being recognised as the most important issue facing communities.
- 3.61 There is acknowledgement that the UK is not on track to meet Paris Agreement goals and a strong call for adaptation measures is made for coping with extreme heat, drought, rainfall, and storms, such as retrofitting existing homes and villages.
- 3.62 One comment, however, suggests that there should be a stronger emphasis on the ecological emergency, not just climate, with amended bullet points under Objective 1 to better reflect this.
- 3.63 Comments also highlight strong support for protecting biodiversity, tree planting, flood control using natural systems and prioritising brownfield development. There is a suggestion that protecting nature will inherently support climate goals.
- 3.64 There is some concern around the objective in regard to large-scale housing development. It is suggested that such sites damage the environment and rural character, increases traffic, resource use, and infrastructure pressure and conflicts with climate goals, especially in Tier 3 villages with poor public transport.
- 3.65 It is also suggested that flood management is improved before approving further large-scale housing.
- 3.66 In regard to Digital and Carbon Reduction Support, a request is made for WODC guidance on carbon-reducing strategies for homes and businesses. Difficulty navigating commercial advice without bias is noted.
- 3.67 **Key matters arising from feedback:**
- **BBWOT suggest some changes to the bullet points**

3.68 Objective 2 – To foster healthier and happier communities across West Oxfordshire

- 3.69 It is highlighted that current cycling infrastructure is described as poor and unsafe, with roads like the A40, A361, and B4020 being considered dangerous for cyclists, especially children.
- 3.70 There is therefore strong support for safe cycle paths to connect villages and towns, with an example cited in other areas where cycle paths run along field edges. It is highlighted that safer routes would encourage cycling for all ages, including commuting and family use and a potential for cycle hire businesses.
- 3.71 There is also support for high-quality green spaces that prioritise wildlife and biodiversity, avoid pesticide use, include native plants and flowers and that avoid mowing during April–July to protect habitats.
- 3.72 Comments show encouragement for local food production and distribution, however there is some concern that large-scale housing developments on agricultural land undermine food security. It is highlighted that there should be an emphasis on the need to balance development with geopolitical food supply concerns.
- 3.73 **Key matters arising from feedback:**
- **A suggested change to Objective 3, bullet point 2: Establishing a healthier food environment by enabling the growing, distribution and consumption of local food, and enabling more diverse food choices**

3.74 Objective 3 – To protect, support and enhance the quality and resilience of West Oxfordshire’s built, historic and natural environments.

- 3.75 There is some concern that there are too many types of certain businesses, particularly in Witney, such as barber shops, and there is a suggestion to encourage a wider variety of businesses by offering low rents/rates for 2–3 years to help them establish.
- 3.76 There is a strong call to end biodiversity destruction and pollution, with WODC urged to take responsibility and act locally, even if global efforts are lacking. There is support for nature recovery objectives, but concern over the Council’s ecological expertise to enforce biodiversity net gain. There is a suggestion to collaborate with BBOWT and university experts for better ecological oversight.

- 3.77 One comment expresses criticism of top-down planning approaches stating that residents feel disconnected.
- 3.78 There is specific objection to Combe being designated as a Tier 3 village for development, despite its protected status in the Cotswolds National Landscape.
- 3.79 There is general support for more affordable housing, but with a preference for brownfield sites or infill development, with an emphasis on protecting green spaces for future generations.
- 3.80 **Key matters arising from feedback:**
- It is suggested that the second two bullets in Objective 4 should be the first 2 - there is too much of a top-down approach
 - For Objective 3 to be successful, villages like Combe which has been designated for "special landscape protection, conservation and enhancement" as part of the Cotswolds CNL, should not be designated as a Tier 3 village for development
- 3.81 **Objective 4 – To allow West Oxfordshire’s resident communities and businesses to thrive within a network of attractive, vibrant, and well-connected market towns and villages.**
- 3.82 One comment suggested that local communities should be consulted, and the feedback from such consultations be given significant weight, before planning permission is given for large scale or 'out of character' housing developments, stating that few will want a continuous conurbation stretching from Oxford to Witney.
- 3.83 **Objective 5 – To make sure that all of our residents are able to meet their housing needs.**
- 3.84 Comments suggest strong support for bringing empty housing and business premises back into use.
- 3.85 There is concern over properties used as second homes or Airbnbs, which reduce availability for local residents and alter the village character and economy. Suggestions relating to this include the licensing of all Airbnbs to ensure safety and oversight, restricting holiday rentals to a set percentage of housing stock, especially in areas like Burford where 1–3 bed homes are scarce and introducing a main residence clause for new homes, similar to policies in Cornwall.
- 3.86 The need for a balanced housing approach to support families, schools, and elderly care is highlighted, with a call for genuinely affordable and social housing to be a key focus and homes being built in appropriate locations to meet actual needs. There is also some concern that small homes are being bought to build extensions.

3.87 Comments also suggest criticism of developers holding onto land banks without building, with a suggested proposal for a policy requiring construction to begin within 18 months of planning approval, with clear intent to complete, otherwise permission should be revoked.

3.88 Key matters arising from feedback:

- **Suggestions regarding concerns about ‘Air BNBs’ include restricting the number to a percentage of a town’s housing stock and the licensing of all Air BNBs, with a main residence clause for new homes**
- **There is a suggestion that commencement of building should begin within 18 months of achieving planning permission or planning permission to be revoked**

3.89 Objective 6 – To foster a thriving, diverse and resilient economy in West Oxfordshire, leveraging its strengths and future growth potential.

3.90 One comment notes that the road infrastructure around Witney is poor, congested, and probably a barrier to entry for some businesses that might otherwise want to operate from the area.

3.91 Another comment supports this objective but questions how it will be resourced.

Core Policies

3.92 There is a suggestion for the addition of a Community-Led Stewardship policy, with the recommendation that major developments involving community assets and planning applications should include a Stewardship Strategy which should be supported by Section 106 agreements and include asset management options (e.g. local authority, parish council, community management organisation).

3.93 One comment calls for the clarification of the proposed definition of major development (residential schemes of 10+ units and non-residential developments with 1,000 sqm+ floorspace to avoid confusion with minerals and waste applications, which may also fall under this category.

3.94 Key matters arising from feedback:

- **Suggestion for a Community-Led Stewardship Policy – see comments**
- **Request for major development to be defined as above**

3.95 Core Policy 1 – Climate change

3.96 Many respondents support the inclusion of climate change as a central theme in the Local Plan, with a strong backing for net-zero carbon goals, energy efficiency, and nature-based solutions.

- 3.97 There is also strong support for integrating nature-based solutions into development, with suggestions including enhancing riparian buffer zones, restoring floodplain capacity, using natural materials (e.g. hemp) in construction and promoting biodiversity net gain and ecological resilience.
- 3.98 Many comments indicate that flooding is a major concern across West Oxfordshire, especially in villages like Bampton, Standlake and Ascott-under-Wychwood. There are calls for avoiding development on floodplains, enhancing natural flood defences, improving sewage infrastructure and recognising current flood risks, not just future climate impacts.
- 3.99 There is criticism that transport emissions are under-addressed in CPI, with comments citing that transport accounts for nearly half of local emissions, yet the policy focuses mainly on buildings. Recommendations that have been suggested are to align development with public transport corridors, reduce car dependency, support rail infrastructure (e.g. Carterton – Witney - Oxford link) and to improve bus networks and active travel options.
- 3.100 Comments indicate support for solar panels, heat pumps, and green roofs on new buildings, however some developers argue that local standards exceed national policy, risking viability. Requests for flexibility in applying renewable energy requirements, especially for small sites, are made.
- 3.101 One comment highlights that the volume of required reports for small, but still classed as 'major' (10+) sites is unduly burdensome, particularly at the outline stage, and could lead to delays in development. There is a call for raising the threshold of 'major development' to ensure the delivery of smaller scale sites.
- 3.102 **Key matters arising from feedback:**
- **Flooding is a major concern throughout West Oxfordshire, particularly in some of the villages.**
 - **Transport emissions should feature more prominently in the policy.**
 - **It is recognised that Policy CPI rightly recognises the importance of nature-based solutions, however it is suggested there is currently no reference to the specific need for climate resilience in the freshwater environment.**
 - **Climate Impact Assessments are welcomed for major developments but it is asserted that in areas that have a history of flood risk or additional environmental concerns such as within the Cotswold Natural Landscape, these should be more widely mandated.**
 -
- 3.103 **Core Policy 2 – Settlement Hierarchy**
- 3.104 Several comments express dissatisfaction with the consultation process itself. Issues highlighted include the lack of transparency regarding preferred sites and questions over the decision-making process, suggesting that it does not adequately reflect local resident concerns.

- 3.105 Multiple comments indicate that there is strong, widespread opposition to the classification of many small villages as Tier 3. In many cases, this concern is based on the proposed Tier 3 criteria, allowing medium-scale development (up to 300 homes), which could double or triple the size of small villages. Comments from residents of villages such as Combe, Fulbrook, Ascott-under-Wychwood, Filkins & Broughton Poggs, Langford, and Churchill argue they lack the infrastructure and services to be considered hubs.
- 3.106 Many comments call for subdividing Tier 3 into two tiers - Tier 3A for larger, better-connected villages and Tier 3B for smaller, less sustainable villages.
- 3.107 Comments indicate that Bampton is the focus of strong objections to its proposed Tier 2 status. Residents and stakeholders argue it lacks adequate public transport, sufficient employment opportunities, reliable sewerage and flood protection and healthcare and school capacity
- 3.108 There are strong concerns that Tier 2 status would lead to unsustainable growth and damage village character.
- 3.109 Additionally, comments indicate that there is a strong objection to Long Hanborough being included as a Tier 2 settlement, citing inadequate infrastructure to support planned growth.
- 3.110 There is a strong emphasis on protecting the Cotswolds National Landscape (CNL), with development in CNL villages seen as non-compliant with national policy (NPPF). Requests to re-classify CNL villages into Tier 4 or a new Tier 5 to prevent major development are made.
- 3.111 Comments suggest that many residents feel the plan does not reflect local realities, with concerns that the Settlement Sustainability Report (2016) is outdated and lacks transparency. There are calls for updated evidence, local engagement, and respect for Neighbourhood Plans.
- 3.112 Through comments, it is noted that many villages report poor road conditions, limited bus services, flooding and inadequate sewage systems and there are calls for the reassessment of village classifications based on current infrastructure and services.
- 3.113 **Key matters arising from feedback:**
- **There is strong opposition to smaller villages being placed into Tier 3, with the suggestion of a Tier 3A and 3B.**
 - **There is strong opposition to Bampton and Long Hanborough being Tier 2 settlements.**
 - **Comments suggest that overburdened and inadequate infrastructure (particularly sewers/health facilities/schools) are found in many villages.**

3.114 Core Policy 3 – Spatial Strategy

- 3.115 There are recommendations to extend the plan period to 2043 to meet NPPF requirements.
- 3.116 Comments indicate criticism of vague terms like “reasonable level of services” and there are requests for clearer definitions of development scales, an updated Settlement Sustainability Report and transparent site selection criteria
- 3.117 Strong opposition is made to classifying small villages (e.g. Ascott-under-Wychwood, Fulbrook, Combe) as Tier 3. There is concern that medium-scale development (up to 300 homes) is inappropriate and would double village size, harming character and infrastructure with calls to split Tier 3 into two - Tier 3A for larger, more sustainable villages and Tier 3B for smaller, less suitable villages.
- 3.118 Bampton’s Tier 2 status is strongly contested due to limited services and infrastructure.
- 3.119 There are suggestions to reclassify some Tier 2 villages or limit their growth to protect heritage and character.
- 3.120 Comments express concern about infrastructure lagging behind development, especially in the case of sewage systems, roads and traffic congestion and public transport.
- 3.121 However, some comments point out that a reasonable level of development can sustain existing services or even reverse declines in service availability.
- 3.122 There are mixed views on the Carterton – Witney - Oxford rail link, with some comments seeing it as essential for sustainable growth while others argue that it is speculative and shouldn’t underpin policy, instead emphasising bus services.
- 3.123 There are calls to prioritise development near existing public transport hubs (e.g. Hanborough, Charlbury, Kingham stations) and suggestions to expand cycle routes, especially along the A40 corridor.
- 3.124 Comments suggest that Carterton is identified as the most suitable for large-scale growth due to fewer constraints, with Witney and Chipping Norton facing challenges due to infrastructure and landscape limitations.
- 3.125 There is general support for new settlements if they are well-planned and infrastructure led.
- 3.126 There is strong support for protecting the Cotswolds National Landscape (CNL), with requests for stricter limits on development within and near the CNL, use of a 5% growth

threshold to define “major development” and greater emphasis on natural beauty and tranquillity.

3.127 Comments suggest support for small and medium-sized sites to improve delivery rates. There are concerns about housing affordability, especially in rural areas, with a call for more rural exception sites, affordable housing linked to local incomes and balanced growth across all tiers.

3.128 Acknowledgement is requested that Oxford’s unmet housing need will likely require additional allocations in West Oxfordshire.

3.129 **Key matters arising from feedback:**

- **There is strong opposition to smaller villages being placed into Tier 3, with the suggestion of a Tier 3A and 3B.**
- **There are concerns about infrastructure lagging behind development, placing pressure on existing services.**
- **There is a recommendation to extend the plan period to 2043 to meet NPPF requirements.**

3.130 **Core Policy 4 – Delivering New Homes**

3.131 It is noted that the current intention is for the new local plan to have an end date of 2041, but that adoption may not occur until 2027 or later. To comply with national policy, a number of comments recommend that the plan period be extended to 2043, thereby increasing the housing requirement.

3.132 Some comments support growth to address housing shortages, while others fear overdevelopment, especially in smaller, rural villages.

3.133 There are calls for realistic targets, better data, and more community-led planning.

3.134 The plan identifies a housing requirement of 14,480 new homes across the plan period, with a 10% buffer, raising the proposed housing supply total to 16,000. Many comments suggest that this figure should be higher, especially to account for Oxford’s unmet housing need, economic growth and affordable housing shortfalls.

3.135 West Oxfordshire previously committed to 2,750 homes to help meet Oxford’s unmet need and comments suggest that there is uncertainty about how much unmet need remains and how it should be distributed. There are calls for clear agreements with Oxford City Council, inclusion of unmet need in the housing requirement and avoiding reliance on speculative assumptions or deferring decisions.

3.136 Several comments challenge the underlying methodology for calculating housing targets, saying metrics like the 2014 SHMA or HENA inflate growth predictions. Commenters urge a review of assumptions and demand estimation with realism about population trends,

economic activity, and migration. Concerns about speculative development and developer stockpiling add scepticism about implementing housing strategies effectively.

- 3.137 Comments have highlighted that strategic sites like Salt Cross Garden Village, West Eynsham SDA, and North Witney SDA have not delivered as expected and there are concerns about infrastructure delays, multiple land ownership issues and an over-reliance on large sites.
- 3.138 There is strong support for allocating small and medium-sized sites, especially in Tier 3 villages, as it is stated that these sites are faster to deliver, more flexible and better suited to local needs.
- 3.139 Concerns about the environmental impact of housing developments permeate multiple comments. Developers are urged to avoid harming the rural character and protected landscapes, particularly the Cotswold National Landscape, Green Belt, and conservation areas. Several commenters express opposition to large-scale developments in Tier 3 villages and other ecologically sensitive areas, recommending prioritisation of brownfield sites and smaller, sustainable housing solutions. Biodiversity preservation, climate considerations, and retaining the unique character of villages are highlighted as priorities.
- 3.140 Comments note that West Oxfordshire has a high affordability ratio (10.89), indicating severe housing cost pressures and that the majority of affordable housing need is for 1–2-bedroom homes. Suggestions include to alleviate the pressure include building upwards, subdividing homes, using brownfield sites and creating homes for the elderly to free up larger properties.
- 3.141 Concerns regarding infrastructure (particularly roads, sewage and healthcare) are raised, with it being recommended that new infrastructure must be delivered in step with housing.
- 3.142 **Key matters arising from feedback:**
- **The plan period should be extended to 2043.**
 - **There are concerns about meeting Oxford's unmet housing needs, including the need to have a clear agreement with Oxford City Council.**
 - **There is a challenge to the 905 homes/year target with many contributors question the robustness of the housing need figure, suggesting it may be too high and based on flawed or outdated data.**
 - **Comments suggest reducing the reliance on large strategic sites and increasing small and medium-sized site allocations for faster delivery.**
- 3.143 **Core Policy 5 – Supporting Economic Growth and Local Prosperity**
- 3.144 There is strong support for rural business growth, including farm diversification and small enterprises and an emphasis on supporting SMEs, green industries, and tourism (e.g. Cotswolds, Blenheim Palace).
- 3.145 Comments suggest support for mixed-use developments to reduce travel and support local economies, with a need for diverse employment types, not just traditional B-class uses.

- 3.146 Specific sites like Enstone Business Park are identified for mid-tech and R&D sectors.
- 3.147 Comments suggest frustration over lack of visibility of preferred development sites with concerns that this limits meaningful public engagement and informed feedback.
- 3.148 There are calls for more employment land, especially near housing developments to reduce commuting. The Economic Needs Assessment by AECOM informs employment land needs but is seen as too conservative, with other studies (e.g. HENA, Savills) suggesting higher demand for employment land. As such, there are calls for flexibility and site allocations to reflect suppressed demand and future growth.
- 3.149 Comments highlight disagreement with absorbing Oxford's unmet housing need due to environmental constraints (CNL, floodplains). There are calls for brownfield development and small-scale rural housing only where needed.
- 3.150 Comments express frustrations over infrastructure and transport issues affecting economic and community vitality. Suggestions include re-opening High Streets and improving transport options in new estates to make living and working more feasible.
- 3.151 It is strongly suggested that infrastructure must be legally secured before development, not promised afterward. Grampian conditions (requiring infrastructure before occupation) are supported in principle, but seen as ineffective in practice.
- 3.152 Sewage treatment is a major concern, especially in South Leigh and Aston with Thames Water delays and lack of accountability being highlighted. There is a suggestion to include WASP (Windrush Against Sewage Pollution) as consultees.
- 3.153 Chronic congestion and car dependency are seen as major issues along the A40 corridor. Park & Ride schemes are underused due to poor planning (e.g. no bus lanes) and rail proposals are considered to lack detail, costings, and feasibility which risks making the plan unsound.
- 3.154 Comments suggest mixed view for the rail proposals. Some see it as essential for long-term growth while others argue it is speculative, costly, and lacks deliverability, with bus infrastructure is seen as more immediate and viable, especially along the A40 corridor. Suggestions for improvements include High Occupancy Vehicle lanes and better bus depot infrastructure, with new depots in Carterton and Witney recommended.
- 3.155 South Leigh & High Cogges Parish Council strongly supports maintaining Tier 4 status to protect rural character. There is concern over infrastructure strain and lack of clarity on how tiers might change.
- 3.156 **Key matters arising from feedback:**
- **There are strong suggestions that infrastructure must be legally secured before development and not promised afterwards**

- There is a suggestion to include **WASP (Windrush Against Sewage Pollution)** as a consultee with sewage treatment capacity a major concern
- There are mixed views regarding rail proposals with concerns about feasibility and cost and some comments suggesting a focus on bus transport instead
- A need to avoid vague language like “work in partnership”; instead, require formal consideration of local plans.

3.157 **Core Policy 6 – Delivering Infrastructure In-step with New Development**

- 3.158 Comments highlight widespread support for the principle that no housing should be built without adequate infrastructure (roads, sewage, schools, healthcare). Numerous examples are cited where infrastructure has lagged behind development, causing environmental, social, and logistical issues.
- 3.159 Such examples include villages like Stanton Harcourt, Sutton, Combe, and South Leigh express strong opposition to new development due to existing infrastructure failures such as sewage flooding, poor water pressure, lack of public transport, and overburdened roads.
- 3.160 There is a desire for thoughtful planning to ensure sustainable, connected, and vibrant communities rather than isolated housing estates.
- 3.161 Comments acknowledge the challenges faced by the Council in coordinating infrastructure delivery, particularly where responsibilities lie with other bodies such as utility providers and healthcare services. Issues such as the economic dependency of healthcare facilities and the Council's ability to collaborate with external providers were raised.
- 3.162 There are calls for stronger enforcement and clearer mechanisms to ensure infrastructure delivery, with concerns that vague language (e.g., “timely manner”) allows for developer evasion. Requests for monitoring and accountability are made.
- 3.163 Support is shown for Community Infrastructure Levy (CIL) and Section 106 (s106) contributions, with a preference for pooled funding across developments to support district-wide infrastructure (e.g., rail, sewage upgrades). There are calls for clawback mechanisms for forward-funded infrastructure.
- 3.164 There are mixed views regarding Infrastructure Delivery Plans, with some comments supporting IDPs for large strategic sites and others suggesting that the 10-unit threshold is too low, suggesting 50+ units as more appropriate. Comments indicate concerns about administrative burden, especially for small and medium-sized developments.
- 3.165 Developers and planning consultants assert that infrastructure requirements must be proportionate, outline applications should not require full assessments and that flexibility is needed in planning obligations and delivery mechanisms.

- 3.166 Comments suggest strong support for using Grampian planning conditions to prevent development until infrastructure is in place, although some comments argue that these should restrict commencement, not just occupation. However, others caution that Grampian clauses can be ineffective or manipulated by developers.
- 3.167 Sewage and water infrastructure are repeatedly cited as overwhelmed or inadequate. Thames Water and others stress the need for early engagement and long lead times for upgrades. Suggestions include to help improve these include greywater recycling, permeable paving, green roofs and rainwater harvesting.
- 3.168 There is support for digital connectivity, especially in rural areas.
- 3.169 Environmental issues, such as avoiding developments on flood plains and taking action to mitigate increased flooding risks due to climate change, are frequently noted. Green infrastructure and environmentally conscious development practices are highlighted as priorities.
- 3.170 Comments from the NHS and others stress the need for health infrastructure to be treated as essential, with proposals for dedicated sections in the Local Plan outlining healthcare contributions.
- 3.171 Comments highlight that education infrastructure must be phased and aligned with development.
- 3.172 **Key matters arising from feedback:**
- **There is huge concern regarding infrastructure (particularly water/sewage/public transport/schools/healthcare) lagging behind development and there are calls for infrastructure to be in place first/Grampian Conditions applied, particularly in Tier 3 settlements.**
 - **Comments insist that developers must be held accountable for delivering promised infrastructure.**
 - **There are calls for stronger enforcement of infrastructure, with clear expectations for delivery and tighter policy wording to avoid developer evasion.**
 - **There are suggestions for policy wording changes to 5.88, 5.92, 5.93 and 5.100 – see comments**
 - **Guidance could be provided to secure take up of Oxfordshire County Council's Digital Infrastructure Programme to enable start up and SME development across West Oxfordshire, not just in towns and larger villages.**
- 3.173 **Core Policy 7 – Water Environment**
- 3.174 There is strong support for the intent of CP7, especially around sustainable water management, however there are urgent calls for more detailed, enforceable, and realistic policies and frustration with current infrastructure and scepticism about future capacity.

- 3.175 Comments suggest a widespread concern about building homes in flood-prone areas, especially Tier 3 villages, with an emphasis on the cumulative impact of small developments on flood risk. There are calls for a standalone flood risk policy to avoid dilution of its importance.
- 3.176 There is a recognition of the role of Catchment Partnerships in managing water environments and calls for WODC to work more closely with Oxfordshire County Council, Thames Water, and neighbouring authorities.
- 3.177 There is strong support for robust flood mitigation, including future-proofed Sustainable Drainage Systems (SuDS), monitoring and maintenance of drainage infrastructure, avoiding development on or near floodplains and the use of nature-based solutions.
- 3.178 Many comments suggest that Thames Water's capacity is questioned with many believing that it cannot support new developments, with numerous reports of sewage overflows, poor maintenance, and illegal discharges.
- 3.179 There is strong support for the "polluter pays" principle and suggestions to use Grampian conditions to prevent development until infrastructure is improved.
- 3.180 One comment suggests that CP7 lacks recognition of rivers as ecological assets and its recommendations include buffer zones of at least 10m, restrictions on artificial lighting near rivers, de-culverting and restoration of natural river features and avoiding hard engineering solutions.
- 3.181 There are mixed reactions to CP7's proposal of 90 litres/person/day water usage target. Some support it due to water stress in the Thames region, while others argue it exceeds national standards (110 l/p/d) and lacks viability evidence. There is a suggestion to align with Building Regulations Part G and future national standards.
- 3.182 One comment highlights concerns about the burden of documentation required for even small developments, with a recommendation that requirements should be scaled to development size, some reports should be deferred to later planning stages and that outline applications should not require full assessments.
- 3.183 **Key matters arising from feedback:**
- **Many comments relate to Thames Water's capacity to support new developments, with concerns about sewage overflow and illegal discharges.**
 - **Grampian conditions are supported in principle, but comments suggest stricter enforcement.**
 - **There are comments that suggest that the proposed water usage target per person/per day exceeds national standards and lacks viability evidence.**
 - **There are calls for a standalone flood risk policy.**
 - **Other recommendations are made by individual commenters – see comments.**

3.184 Core Policy 8 – High Quality and Sustainable Design

- 3.185 Strong support is shown for design that reflects local character, especially in villages and conservation areas.
- 3.186 There is criticism of uniform, mass-produced housing that lacks architectural distinction and calls for greater use of local materials (e.g. stone, limited red brick) and integration with landscape with an emphasis on contextual sensitivity—designs should complement surroundings, not dominate them.
- 3.187 Comments suggest mixed views in relation to the use of Design Review Panels. Some support panels to improve design quality and enforce standards while others worry about delays and lack of clarity on how and when panels would be used. A suggestion is made to use panels selectively for large or sensitive developments.
- 3.188 There is a strong desire for local consultation and community input into design and layout, with support for Neighbourhood Plans and Village Design Guides as material considerations and proposals for community forums to influence large developments.
- 3.189 There is support for alignment with the West Oxfordshire Design Guide, National Design Guide and Oxfordshire Street Design Guide with suggestions to include future adaptability indicators (e.g. spatial flexibility, lifecycle carbon), innovation Plans for major developments and modular housing as part of site allocations.
- 3.190 Concerns are raised about the potential for policy duplications or challenges in achieving high-quality and affordable housing simultaneously. This includes mentions of overlapping national policy and scepticism about achieving dual goals of affordability and quality in development practices.
- 3.191 The importance of preserving views, especially in the Cotswolds National Landscape and Blenheim World Heritage Site is highlighted.
- 3.192 Requests are made to clarify the distinction between amenity views and heritage significance with a recommendation to use terms like “conserve and enhance” rather than “protect and preserve” and there are suggestions to strengthen policy language from “should” to “must”.
- 3.193 Comments indicate broad support for renewable energy, SuDS, EV infrastructure, and low-carbon construction. However, there are concerns about heat pump viability and solar farms on agricultural land.
- 3.194 **Key matters arising from feedback:**
- **A change of language from “should” to “must” to ensure enforceability regarding for example solar panels, EV chargers, and sustainable drainage systems (SuDS)**

- **There are requests to clarify what constitutes ‘important views’: Multiple comments ask for clearer definitions and distinctions between amenity views and heritage significance.**
- **There are repeated concerns about large-scale developments lacking architectural variety and sensitivity to landscape, with requests to avoid uniform housing estates**

3.195 Core Policy 9 – Healthy Place Shaping

3.196 Comments indicate a desire for more targeted, inclusive, and flexible approaches to healthy place shaping. There are concerns about practicality, proportionality, and clarity.

3.197 A clarification of the definition of ‘major development’ has been requested.

3.198 Comments suggest mixed views on requiring a Health Impact Assessment (HIA) for all major developments, with some supporting them as essential for embedding health in planning, while others argue they duplicate work already done in the Local Plan. It is suggested that HIAs are only required for strategic or unallocated sites.

3.199 One comment expresses concerns about the volume of reports required for even small developments, such as HIAs, and suggests raising thresholds and deferring some reports to later planning stages.

3.200 There are concerns about post-development reviews which are seen as unclear and hard to implement.

3.201 Comments highlight that failure to meet affordable housing needs has severe health impacts, especially for children and young people and that building in remote locations can worsen access to jobs, education, and social networks, affecting wellbeing.

3.202 Local residents raised concerns about housing developments in rural areas, particularly Tier 3 villages, and their disruptive nature. These concerns included the blighting of rural landscapes, disruption to the daily lives of existing residents, and potential compromises to mental and physical well-being. Stress from urbanisation was highlighted as a significant challenge.

3.203 Comments suggest a lack of focus on young people’s needs and there are calls for youth centres, multi-Use Games Areas (MUGAs) and recreational spaces. It is recommended that community centres should be required in larger developments.

3.204 There is strong support for walking, cycling, and public transport as health-promoting with initiatives like Oxford Bus Group’s “chatty bus” praised for tackling loneliness.

3.205 There is support for walking maps, play areas, and communal food growing and an emphasis on the need for accessible green spaces for mental and physical health. There are calls for biophilic design and nature-based solutions.

3.206 It is suggested that art and culture projects should be integrated early in planning with a need for intergenerational planning to support both older and younger residents and support for social prescribing and community development funding.

3.207 Key matters arising from feedback:

- **More focus on young people's needs is needed such as MUGAs, youth centres and recreational areas**
- **Many comments suggest that HIAs should not be required for all major developments with suggestions that they are restricted to strategic-scale or unallocated sites, provide clear thresholds (e.g. 50+ dwellings or 1,000 sqm commercial space), use standard templates (e.g. HUDU guidance) to ensure consistency and remove or clarify the post-development review requirement**

3.208 Core Policy 10 – Sustainable Transport

3.209 While there is broad support for sustainable transport goals, many comments demonstrate a belief that CPI0 is idealistic and urban-centric, ignoring rural realities.

3.210 It is suggested that CPI0 needs to recognise differences between urban and rural areas (as per NPPF), be flexible in application and avoid one-size-fits-all requirements.

3.211 Several commenters highlight the importance of tailoring sustainable transport policies to the specific characteristics of each locality, recognizing that urban and rural areas require different approaches. Suggestions include referencing Neighbourhood Plans, phased infrastructure improvements, and addressing site-specific needs within transportation planning.

3.212 Comments also suggest criticism of outdated or incomplete transport data, a lack of deliverable infrastructure plans and an over-reliance on aspirational schemes (e.g. rail corridor).

3.213 Phased infrastructure improvements with realistic funding and timelines is called for.

3.214 Comments suggest that there is a strong consensus that private cars remain essential in rural West Oxfordshire due to poor public transport coverage, long distances to services and inadequate cycling infrastructure.

3.215 It is noted that bus services are often infrequent, unreliable, or non-existent in villages and there are concerns about lack of investment and delays in infrastructure delivery (e.g. A40 corridor, Witney rail link). Comments also highlight that roads are unsafe for cyclists and that cycling is impractical for older or less fit residents.

- 3.216 Recommendations for public transport service improvements include cross-county bus integration (e.g. with Gloucestershire), Demand-responsive transport (DRT) like “The Robin” and better rail connectivity, especially to Oxford and London along with giving free bus travel to under-25s
- 3.217 Suggestions for improved active travel include safe cycle routes between villages, bridleway maintenance and walking maps and public realm improvements.
- 3.218 Comments show support for reducing car use due to air pollution, road safety concerns and mental and physical health benefits of active travel.
- 3.219 There are suggestions for Environmental Impact Assessments where traffic increases significantly.
- 3.220 Comments note that urban design alone cannot reduce car use without viable alternatives with the suggestion that development should be located near transport hubs.
- 3.221 Compact, mixed-use communities are supported but must be context-sensitive.
- 3.222 **Key matters arising from feedback:**
- **It is suggested that more consideration is given to the differences between rural and urban areas, with rural areas often having poor public transport services and unsafe, inadequate walking and cycling infrastructure making car use essential. It is requested that policies should not penalise car users without viable alternatives**
 - **There are requests to use Oxfordshire County Council’s “Decide and Provide” transport assessment guidance, Oxfordshire Parking Standards, Oxfordshire Street Design Guide and the National Design Code and Healthy Streets Approach**
- 3.223 **Core Policy II – Historic Environment**
- 3.224 There is broad support for the aims of CPI I. There is an emphasis on heritage as central to identity, character, and sense of place in West Oxfordshire
- 3.225 There is strong support for protecting designated heritage assets (e.g. listed buildings, conservation areas, World Heritage Sites).
- 3.226 However, there is concern that non-designated heritage assets (e.g. historic landscapes, vernacular buildings) are not given enough protection and many call for Heritage Impact Assessments (HIAs) to be required for developments affecting non-designated assets.
- 3.227 Comments indicate criticism of phrases like “impact on heritage assets” and “significant weight to value” of non-designated assets, with suggested rewording to align with National Planning Policy Framework (NPPF). Comments suggest a preference for terms like “harm to significance” and “balanced judgement”.

- 3.228 There are also concerns that CPI I duplicates national policy and may be redundant without stronger local mechanisms.
- 3.229 Comments indicate additional concerns about the lack of enforcement of existing protections with calls for clear mechanisms, evidential requirements, and planning conditions to ensure compliance. There is a desire for real action, not just statements of intent.
- 3.230 Many parish councils (e.g. Minster Lovell, Shipton, Charlbury) support CPI I but request specific protections for local heritage features, recognition of unique village characteristics and integration of local design statements and neighbourhood plans.
- 3.231 There is support for updating and adopting Conservation Area Appraisals, especially in Tier 2 and Tier 3 villages. There are also requests for consistent application of appraisals to guide development, due to a frustration over lack of enforcement and maintenance in existing conservation areas.
- 3.232 There are calls to protect historic landscapes, including ridge and furrow fields, ancient woodlands and meadows and historic settlement patterns (e.g. Chartist plots in Minster Lovell). Suggestions are made to use landscape character assessments and Cotswolds CNL guidelines to inform planning.
- 3.233 There is support for preserving and investigating archaeological sites, with a highlighted example being the Romano-British site in Chipping Norton with potential national significance. Comments emphasise early consultation with Oxfordshire County Archaeological Service (OCAS).
- 3.234 Comments make a recommendation to clarify that the outstanding universal value (OUV) of Blenheim Palace is synonymous with significance under the Levelling Up and Regeneration Act. There is concern over developments (e.g. Botley West Solar Farm) impacting the setting of Blenheim WHS.
- 3.235 **Key matters arising from feedback:**
- **There is concern that non-designated heritage assets (e.g. historic landscapes, vernacular buildings) are not given enough protection and many call for Heritage Impact Assessments (HIAs) to be required for developments affecting non-designated assets**
 - **There are many suggestions to reword phrases like “impact on heritage assets” to “harm to significance” to better reflect national policy, to avoid vague or misleading terms such as “historic character” when “significance” already encompasses this and to ensure consistency with NPPF paragraphs 214, 216, and 207**
 - **There are strong objections to giving “significant weight” to non-designated assets, as this contradicts national policy which calls for a balanced judgement.**

- It is suggested to replace “value” with “significance” to align with established terminology and to include clearer criteria for identifying and assessing non-designated assets.
- In the recognition of Outstanding Universal Value (OUV) of World Heritage Sites, comments suggest that it should be clarified that OUV and significance are synonymous, especially for Blenheim Palace and the policy should avoid wording that implies they are separate concepts.
- It should be ensured that archaeological sites are clearly included in the definition of heritage assets.

3.236 Core Policy 12 – Natural Environment

- 3.237 Comments indicate broad support for the policy’s intent to protect and enhance biodiversity. It is understood that the UK is one of the most biodiversity-depleted countries and that urgent action is needed.
- 3.238 Suggestions for improvement include integrating wildlife-friendly features in developments (e.g. swift bricks, hedgehog highways, wildflower areas) and a strong emphasis on protecting irreplaceable habitats like Pinsley Wood, an ancient woodland with high ecological and cultural value, with protection for SACs, SSSIs, ancient hedgerows, and veteran trees.
- 3.239 Some comments propose giving parts of nature (e.g. rivers) non-human entity status for legal protection.
- 3.240 However, there is some criticism that the policy lacks clarity, enforceability, and flexibility. It is recommended that it should also apply to minor developments, should explicitly reference Biodiversity Net Gain (BNG) and irreplaceable habitats and should include landscape character considerations.
- 3.241 There is also some concern over the feasibility of delivering 20% BNG, which exceeds national requirements.
- 3.242 Comments also suggest that the policy needs stronger wording (e.g. “will not harm” vs. “prevent harm”) and there are concerns about a lack of enforcement and post-development monitoring with suggestions for structured maintenance plans and regular inspections.
- 3.243 Improved collaboration with local councils, NGOs, and landowners is also suggested.
- 3.244 There are calls for more areas to be designated as Local Green Spaces, especially in Witney (e.g. The Leys, Ducklington Lake) with the Local Plan being seen as a “once-in-a-generation” opportunity to protect these spaces.
- 3.245 Comments suggest strong support for aligning the Local Plan with the Oxfordshire Local Nature Recovery Strategy (LNRS).

- 3.246 Some comments suggest that the volume of required reports (such as an Ecological Impact Assessment and Mitigation and an Ecological Post-development Management and Monitoring Plan) is excessive for small developments and calls for simplification and flexibility, especially at the outline planning stage.
- 3.247 Concerns about development encroaching on wildlife corridors and habitats for protected species (e.g. bats, badgers, roe deer).
- 3.248 **Key matters arising from feedback:**
- **Multiple comments suggest concern that the required 20% BNG exceeds national requirements and is not compliant with the NPPF**
 - **Ensure that development aligns with Oxfordshire's Local Nature Recovery Strategy**
 - **Many calls for the protection of Pinsley Wood**

Place-Based Policies

3.249 Policy PL1 – Cotswold National Landscape

- 3.250 Comments appreciate that WODC acknowledges the importance of preserving the scenic beauty, tranquility, and biodiversity of the CNL, with the National Planning Policy Framework (NPPF) giving the highest protection status to National Landscapes, which is reflected in the Local Plan.
- 3.251 There is strong support for requiring Heritage Impact Assessments for locally significant assets.
- 3.252 Comments recommend some changes to the policy. These are that the policy should reference NPPF paragraph 190 (not 183) regarding major development, there are calls for clearer definitions (e.g., “active contribution”) and more streamlined wording and suggestions to proactively reduce existing harms (e.g., light pollution, traffic) to the landscape.
- 3.253 Additionally, the policy must not hinder mineral extraction near the CNL, especially limestone quarrying, which is supported by the CNL Management Plan. There is a recommendation to align wording with national policy by stating “give great weight to conserving and enhancing” rather than “must conserve and enhance.”
- 3.254 Comments highlight confusion regarding naming conventions, such as the shift from 'Area of Outstanding Natural Beauty' to 'National Landscape,' which some argue undermines the descriptive value of the designation. Clarifications are requested for terminology such as 'active contribution' and inconsistencies in referencing within policies.

- 3.255 Comments place an emphasis on the need to protect views both within and from outside the CNL and it is recommended that development should be sensitive to existing landscape patterns and include mitigation like planting and landscaping.
- 3.256 Many comments strongly believe that medium-scale developments (up to 300 units) in Tier 3 villages like Combe and Fulbrook are inappropriate and contradict the aims of PLI. There are suggestions to reclassify villages within the CNL to a lower tier to limit development.
- 3.257 There is also concern that government proposals allowing developers to pay environmental fees could undermine protections.
- 3.258 There are, however, suggestions that affordable housing is urgently needed in areas like Charlbury and Ascott under Wychwood, and that this need may justify development within the CNL. Public interest, supporting local services and local housing shortages are cited as reasons to allow proportionate growth.
- 3.259 Comments note that rural residents often rely on cars due to limited public transport, which conflicts with climate and sustainability goals. Development in areas without adequate transport infrastructure is therefore seen as problematic.
- 3.260 **Key matters arising from feedback:**
- **To strengthen the protection of the CNL - Policy changes suggested by the CNL Board – see comments**
 - **To reclassify villages in the CNL, such as Fulbrook and Combe, from Tier 3 to Tier 4 to avoid development pressures**
- 3.261 **Policy PL2 – Oxford Green Belt**
- 3.262 There is strong public sentiment that the Green Belt should be “sacred” and not gradually eroded. Comments suggest that it is seen as essential for maintaining the identity and separation of towns and villages and that development should focus on brownfield sites, not Green Belt land.
- 3.263 There are some comments expressing concern about vague terms like “previously developed land” and “land not contributing to the Green Belt,” which could be exploited by developers. It is suggested that there is an emphasis on the need for clear definitions, especially around the emerging concept of ‘Grey Belt’, to avoid misinterpretation.
- 3.264 Comments suggest support for a collaborative review of the Green Belt, as the previous review was in 2015. Comments advocate for stakeholder consultation and council-led definitions.
- 3.265 While comments recognise Oxford’s housing pressures, there is strong belief that West Oxfordshire’s landscapes are equally as valuable. Recommendations include Oxford sharing its underused green spaces, like college sports fields, before West Oxfordshire sacrifices its Green Belt.

- 3.266 There is opposition to placing large solar farms on Green Belt land, with preference for affordable housing schemes where homes can invest in solar panels individually and there is a call for a policy guiding the location of solar and wind farms, ideally along transport corridors.
- 3.267 Comments highlight that Policy PL2, which promotes growth in Tier 3 villages, is seen as contradictory to Green Belt protection.
- 3.268 There are concerns that medium-scale developments on arable land around villages lack evidence and conflict with local values.
- 3.269 **Key matters arising from feedback:**
- **Development should focus on brownfield sites and clearly define 'grey belt' and 'previously developed land' to avoid legal loopholes**
 - **Comments suggest that the Green Belt is important for separating areas to ensure the protection of villages from merging and maintain their distinct identities.**
- 3.270 **Policy PL3 – Conservation and Management of the Windrush Valley**
- 3.271 There are calls for robust planning conditions linking development to infrastructure upgrades, with scepticism about relying on stakeholder collaboration (e.g. Thames Water) without enforceable policy mechanisms. Comments stress the urgent need to address poor water quality, especially from sewage discharges.
- 3.272 Comments suggest rewording the policy language for clarity and enforceability, especially around long-term ecological management, the application of the mitigation hierarchy and the explicit requirements for nature recovery, habitat restoration, and ecological connectivity.
- 3.273 The CNL Board supports Policy PL3 but recommends that explicit reference to the CNL Landscape Character Assessment is made, protection of Landscape Character Type 16 – Broad Floodplain Valley and the inclusion of the Evenlode Valley under the same policy framework.
- 3.274 Comments emphasise the importance of recognising and enforcing designations such as the Cotswolds National Landscape (CNL) in planning decisions. A concern was raised over development proposals ignoring these designations and the need for them to have appropriate weight in decision-making.
- 3.275 Developers support the policy but make a request for clear mapping of the Windrush Valley, evidence-based criteria for conservation and green infrastructure and an acknowledgement of Mineral Safeguarding Areas and alignment with county-level mineral planning.

- 3.276 There is strong support for creating a separate policy for the Evenlode Valley, which shares similar ecological and landscape characteristics with the Windrush Valley with an emphasis on its environmental fragility and the importance of catchment-wide flood mitigation and biodiversity strategies.
- 3.277 Comments suggest recognition of sand and gravel quarrying in the Lower Windrush Valley as a key land use and that restoration of these sites presents opportunities for wetland creation, species recovery, and landscape-scale conservation. There are requests to include Gill Mill Quarry and other restored areas in the policy, with support for tourism and recreation alongside conservation.
- 3.278 Stanton Harcourt and Sutton residents object to proposed developments that threaten their Conservation Area status. There are concerns regarding visual impact and loss of historic views, the scale of development being disproportionate and the loss of biodiversity due to habitat destruction.
- 3.279 **Key matters arising from feedback:**
- **A number of specific suggestions made by the CNL Board – see comments**
 - **It is suggested that the Evenlode Valley should have a Place Based Policy, either as a part of this policy or its own policy**
- 3.280 **Policy PL4 – Wychwood Forest**
- 3.281 Comments suggest strong support for Policy PL4 and the policy is praised for its focus on landscape and biodiversity conservation.
- 3.282 There is enthusiasm for creating a green network linking woodland blocks like Pinsley Wood, Vincents Wood, Burleigh Wood, and Bladon Heath.
- 3.283 Comments make a request for clearer wording to ensure the policy applies to development within or adjacent to the Wychwood Forest with a need for maps and detailed boundaries to guide planning decisions.
- 3.284 All of the Wychwood Forest lies within the CNL, specifically Landscape Character Area 9E – Wychwood Forest. Recommendations are made to explicitly reference CNL designations in the policy, align with the CNL Landscape Strategy & Guidelines and require development to conserve and enhance key features of Landscape Character Type 9 – High Wold Dip Slope are made.
- 3.285 Comments note that Shipton-under-Wychwood and the surrounding villages are historically tied to the Royal Hunting Forest. Suggestions to preserve and make accessible historic sites like the Royal Hunting Lodge at Langley Farm are made.
- 3.286 There are concerns about the proposed settlement hierarchy leading to unsustainable development in villages like Ascott-under-Wychwood.

- 3.287 There are calls for ecological corridors to connect remnant woodlands and extend across the district and an emphasis on protecting watercourses (not just wetlands) as vital biodiversity and cultural resources.
- 3.288 Comments suggest recognition of Wychwood Forest Trusts' key role in site management, education, and outreach and support for nature-related education and community engagement.
- 3.289 There is strong opposition to development on greenfield sites near the forest, which serve as wildlife corridors and habitats.
- 3.290 **Key matters arising from feedback:**
- **Include the Windrush and Evenlode rivers in the policy wording as key biodiversity and landscape features and add "watercourses" to the first paragraph of Policy PL4 to reflect their ecological significance**
 - **Acknowledge the role of the Evenlode Catchment Partnership in nature-related education and outreach**
 - **Recommendations from the CNL Board are made – see comments**
 - **Maps showing boundaries, nature reserves, and protected areas are suggested**
- 3.291 **Policy PL5 – Carterton – Witney – Oxford Rail Corridor (CWORC)**
- 3.292 Comments suggest mixed views on the merits of this policy.
- 3.293 Supportive comments suggest there will be environmental and congestion benefits, by reducing car dependency, improving air quality and easing traffic on the A40.
- 3.294 Also that it will help to boost local economies, improve access to jobs and support growth in the Oxford-Cambridge Arc.
- 3.295 Additionally, commenters believe that it will improve access to education, healthcare and employment for residents, especially those with access to a car.
- 3.296 There is also support for safeguarding the corridor now, to enable future deliver and integration with other transport plans.
- 3.297 However, other comments are less supportive of the policy.
- 3.298 Some suggest that the rail link is a costly project, with uncertain deliverability and exaggerated benefits with no clear route, station locations, or costings provided. Some comments call for maps and feasibility studies before prematurely safeguarding land that could hinder other development.
- 3.299 There are also concerns about relying on housing development to fund the railway, potentially leading to overdevelopment without infrastructure.

- 3.300 Some comments also highlight potential harm to wildlife habitats, especially in South Leigh and surrounding green spaces.
- 3.301 It has been recommended that alternative solutions such as improving bus services, park-and-ride schemes, and local employment would be more suitable.
- 3.302 Other recommendations suggest the inclusion of target dates for feasibility and construction, clarifying funding mechanisms and developer contribution rules and ensuring integration with wider transport and housing plans.
- 3.303 **Key matters arising from feedback:**
- **There are requests for greater clarity and evidence in the policy, including providing maps of the safeguarded rail corridor, defining station locations and alignment, including delivery timelines, feasibility studies, and funding mechanisms and ensuring legal and planning soundness under CIL regulations**
 - **Alternative suggestions include investing in frequent, reliable bus services as a more flexible and cost-effective alternative and creating local jobs to reduce commuting needs**
- 3.304 **Policy PL6 – Blenheim Palace World Heritage Site (WHS)**
- 3.305 It is recommended that early consultation with Historic England, WHS Steering Group, and local communities is required.
- 3.306 Historic England suggests some clarification of the term “setting” and emphasise that only elements contributing to the outstanding universal value (OUV) should be considered, avoiding vague or overly broad definitions.
- 3.307 They also suggest avoiding duplication - OUV and significance are synonymous in WHS context and there is a need to avoid repeating both. They also suggest replacing vague terms like “visual setting” and “broader environmental context” and using precise language to align with national planning policy (e.g. NPPF).
- 3.308 Further suggestions include avoiding overly negative or ambiguous phrases like “exceptional circumstances” or “demonstrably necessary” and encouraging enhancements rather than mandating them to avoid legal issues.
- 3.309 Finally, to clarify that WHS obligations are met through UK planning law, not separate international policies.
- 3.310 Commenters are worried about Blenheim Palace's significant control as a major landowner, highlighting that communities need more than heritage to thrive. They call for reducing Blenheim's commercial impact on local communities.
- 3.311 Commenters object to development plans by Blenheim developers in nearby areas, specifically Combe. They argue that developments should be restricted due to the area's

inclusion in protected zones such as the CNL and the Wychwood Project, and its visual connection to Blenheim Palace.

- 3.312 There are specific concerns over large-scale development and its impact on the WHS's setting, including housing and energy infrastructure. Suggested amendments focus on avoiding harm to the WHS's OUV while making practical adjustments to policy language around major development. This includes refining criteria for such development and discouraging overly negative or ambiguous phrasing that may lead to subjective decision-making.
- 3.313 Concerns are raised about cumulative impacts of existing, committed, and prospective development near the WHS. Commenters recommend clearer language to articulate these impacts and suggest improved consistency with Environmental Impact Assessment (EIA) regulations. This would ensure appropriate evaluation while avoiding unnecessary confusion or inflated assessments.
- 3.314 **Key matters arising from feedback:**
- **There are significant comments with policy wording change suggestions from Historic England and other commenters – see individual comments**

Settlement Strategies

- 3.315 There is criticism that the plan lacks a clear, evidence-based spatial strategy, especially in Core Policy 3 (CP3).
- 3.316 Some comments highlight a perceived lack of strategic clarity, with no clear indication of development scale or direction and “transformational” growth opportunities are vague or unsupported.
- 3.317 Additionally, there are comments which suggest that the plan is not consistent with the National Planning Policy Framework (NPPF), lacks justification and effectiveness and needs sequential testing for flood risk and infrastructure capacity.
- 3.318 While some comments support the vision, they would like more detail on site impacts. There are also calls for clearer, outcome-focused strategies and an emphasis on demographic balance and sustainability across all settlements.
- 3.319 Concerns are raised about transport, sewage infrastructure, flood risk, and groundwater protection.
- 3.320 In regard to transport infrastructure, comments highlight chronic congestion, especially affecting bus services, with a need for robust transport modelling and mitigation strategies.

There is support for a new A-road link between Carterton and the A40 and a future rail link.

- 3.321 Comments about environmental constraints suggest groundwater vulnerability across settlements and historic contamination in many areas. These comments highlight the need for risk assessments and remediation plans for development sites.
- 3.322 Comments regarding sewage and water infrastructure highlight concerns about Thames Water's delays and financial instability and note that sewage treatment capacity is a limiting factor for development, especially in areas like Bampton, Carterton, and Church Hanborough.
- 3.323 Concerns about flood risk make recommendations that Strategic Flood Risk Assessment (SFRA) should be required, with development being directed to Flood Zone 1. SuDS (Sustainable Drainage Systems) must also be carefully planned.
- 3.324 Suggestions also include creating subsets of settlement tiers based on infrastructure availability and development constraints. Areas like Charlbury, Long Hanborough, and Eynsham could be grouped as having good transport infrastructure, whereas historic locations like Burford and Woodstock should be prioritized for conservation and limited development.

3.325 Settlement-Specific Highlights

3.326 Witney:

- Mix of aquifers; shallow groundwater.
- Focus on reusing brownfield land.
- Transport congestion is a major issue.
- Need for updated contamination studies.

3.327 Carterton

- Strategic mixed-use development proposed north of Brize Norton.
- Includes housing, employment, schools, health centre, and shopping.
- Potential relocation of Crocodiles of the World.
- Safeguarding land for rail and road links.

3.328 Chipping Norton

- Sensitive groundwater due to aquifers and faults.
- Historic contamination risks.
- Growth constrained by landscape and archaeology.

3.329 Burford

- Historic bridge and traffic issues.

- Groundwater protection critical.
- Limited development potential due to heritage constraints.

3.330 **Bampton, Charlbury, Eynsham, Long Hanborough**

- Varying geological and hydrological conditions.
- Groundwater and contamination concerns.
- SuDS and flood mitigation needed.

3.331 **A Policy for Witney**

- 3.332 Supportive comments agree that Witney should be identified as West Oxfordshire's principal town for strategic growth, with the town offering strong infrastructure, employment and services.
- 3.333 Comments also suggest support for development on the fringes of Witney, especially to the west and southwest, where transport links and employment hubs are seen to be strong.
- 3.334 Comments regarding transport infrastructure highlight severe congestion on the A40 and within Witney, especially around Bridge Street.
- 3.335 Comments suggest that there is a lack of commitment to rail connectivity, with concerns about feasibility and timelines (it is not expected until the late 2030s). A recommendation is made to strengthen rail commitments and provide a clear delivery timeline and to integrate rail into new developments.
- 3.336 Comments also suggest that the West End Link Road (WEL2) is ineffective and should be removed.
- 3.337 An absence of a Witney Area Transport Strategy and no reference to the County Council's A40 strategy is also noted.
- 3.338 Regarding sustainable transport, comments suggest that active travel improvements (such as walking/cycling) are underrepresented.
- 3.339 It is also suggested that Demand-Responsive Transport (DRT) is seen as ineffective and not within the plan's remit.
- 3.340 Recommendations to include specific transport policies supporting rail, bus priority, and active travel are made.
- 3.341 Comments show support for affordable housing, but there are concerns about vague terminology like "genuinely affordable". A need for diverse site sizes to support early housing delivery is also called for.

- 3.342 Several developers and other commenters support new housing allocations, including sites at Burford Road, Barnard Gate, Curbridge Downs Farm and West of Downs Road. However, there is a call to improve transparency and public engagement in site allocation decisions.
- 3.343 Comments also suggest that infrastructure delivery must be proportionate and justified.
- 3.344 One comment expresses concerns about the slow decline of the High Street in Witney and warns that unless action is taken, the town risks losing its central heart and becoming like other towns without a strong centre.
- 3.345 Comments also highlight the lack of nightlife options in Witney, suggesting that young people are traveling to Oxford for entertainment because of limited local options. It questions the validity of statements about the town's nightlife, as there seems to be little recent evidence of it.
- 3.346 The Cotswold National Landscape Board raise concerns about light pollution, increased traffic through the CNL and the impact on dark skies and views.
- 3.347 Recommendations to address environmental impacts explicitly in the strategy are made.
- 3.348 There is a call to retain key services (e.g., healthcare) in the town centre to support accessibility. A risk of losing the town centre's role in sustainable movement due to repurposing for leisure/events is suggested.
- 3.349 **Key matters arising from feedback:**
- **There are frequent suggestions regarding the need for stronger, more specific, and deliverable transport solutions for Witney, especially regarding rail, bus, and active travel infrastructure, including calls for more explicit policies on bus priority, zero-emission buses, and improved walking/cycling infrastructure and a clearer rail strategy**
 - **Comments highlight the need to reference the County Council's A40 strategy and the Witney Area Transport Strategy**
 - **There are recommendations to explicitly address impacts on the Cotswolds National Landscape, including dark skies, views, and traffic through sensitive areas**
- 3.350 **Witney Town Centre**
- 3.351 There is support for regeneration of Witney Town Centre but comments suggest concerns about lack of detail on delivery mechanisms for public realm improvements and how housing development can support these improvements.
- 3.352 Some minor editorial issues are noted, for example repeated bullet numbers and typos in paragraph 7.2.29).

- 3.353 Comments suggest that the plan is seen as overly reliant on rail, which Oxfordshire County Council believes is unrealistic within the plan period. If rail is delivered in the long term, it is thought that it could disrupt existing travel patterns, especially bus routes, and increase congestion without a strong supporting transport strategy.
- 3.354 Comments also suggest that there is a limited focus on internal movement within Witney, with more emphasis needed on local transport solutions and reducing reliance on external routes like the A40.
- 3.355 Adding “high quality walking/wheeling environments” to improve accessibility is recommended, as is including Welch Way in the list of key town centre areas.
- 3.356 Archaeology Considerations have been noted, for East Witney SDA where archaeological remains have been found and mitigation required before development, and for North Witney SDA where partial evaluation has been done, with further trenching and mitigation needed before development approval.
- 3.357 **Key matters arising from feedback:**
- **There is repeated feedback that the current plan is too focused on rail and solutions outside Witney (like the A40), rather than on improving movement and accessibility within the town itself**
 - **Multiple comments suggest the need for a greater focus on local walking, cycling, and bus infrastructure to support growth and daily access to facilities. Suggestions include adding “high quality walking/wheeling environments” to the town centre accessibility list and providing more detail on how public realm improvements will be delivered.**
- 3.358 **A Strategy for Carterton**
- 3.359 There are mixed views related to Carterton's development and housing strategy.
- 3.360 Some comments focus on maximising opportunities within the town centre and REEMA sites while avoiding greenfield expansions to protect the landscape and ecology. There is strong emphasis on ensuring housing affordability, high-quality construction, and the alignment of housing strategies with infrastructure improvements.
- 3.361 Comments note that the environmental impacts on nearby villages and protected landscapes must be addressed.
- 3.362 There is widespread concern about the inadequate infrastructure, particularly around transportation and accessibility. Comments discuss issues such as the long commuting times between Carterton and Oxford via the A40, challenges posed by the proposed railway corridor, limited accessibility to the Country Park, and the need for better cycling and walking paths.

- 3.363 A focus on walking, wheeling, and cycling infrastructure is recommended.
- 3.364 Enhancements to public transport, including new bus services and faster connections, are suggested as critical for sustainable growth. It is suggested that the bus services in Carterton have declined significantly, leading to excessive travel times for short distances.
- 3.365 Commenters also raise concerns about preserving Carterton's green infrastructure, wildlife habitats, and landscape settings. Several comments highlight the importance of protecting areas such as the Shill Brook Valley and Alvescot Downs, avoiding development with ecological designations, and exploring connections between natural spaces to create a greenbelt or protected zone around Carterton.
- 3.366 A rail link to Oxford is central to the vision of Carterton, however comments widely question the feasibility and cost and see it as unrealistic within the plan period. Alternative proposals that are made include rapid transit, EV shuttle services, and enhanced bus routes.
- 3.367 A recommendation for a relief road for Brize Norton village, to reduce traffic and improve environmental quality, is made.
- 3.368 The Cotswold National Landscape calls for protection of views, dark skies, and ecological assets near the Cotswolds National Landscape.
- 3.369 There is a recognition of deprivation in northern wards and need for targeted regeneration, with a proposal for a Carterton Community Hub to address food insecurity, isolation, and advice services.
- 3.370 Public engagement and clarity on site allocations are needed in the next consultation phase.
- 3.371 **Key matters arising from feedback:**
- **Prioritisation of realistic, deliverable transport improvements - especially focusing on sustainable and active travel (walking, cycling, and bus transport) over an over-reliance on a new rail link, which many respondents consider unrealistic within the plan period.**
 - **It is suggested that “Walking, wheeling, cycling, public transport, supporting homeworking and car sharing should be discussed first and less weight placed on the railway link so that it does not distract from more realistic and deliverable measures.**
 - **Suggestions include using the term “rapid transit” instead of “rail” to keep options open and to focus on solutions that can be delivered in the short to medium term**
 - **There is support for Carterton as a focus for growth, but with strong recommendations that new development must be well-integrated, protect the identity of surrounding villages, and be supported by necessary infrastructure and community facilities.**

3.372 Carterton Town Centre

3.373 A comment welcomes the adoption of a proper strategic plan for the town centre which they consider to be long overdue.

3.374 The policy outlines a priority for redevelopment of older, low-density MOD housing to boost housing supply in Carterton. A comment suggests that the Local Plan must ensure that any housing delivery for such sites is a realistic part of the planned supply, if they are to rely upon it.

3.375 One comment recommends referring to walking, wheeling and cycling rather than active travel, cyclists, pedestrians and walkers, suggesting more inclusive language.

3.376 Key matters arising from feedback:

- The following amendments to the policy are recommended:
 - a. d)i. Needs to be amended to remove 'local' in front of mobility hub, as this is a specific type of mobility hub, and it not what is being provided as part of the mobility hub trail in Carterton.
 - d)i. when talking about travel modes they should be listed in accordance with the Transport User Hierarchy:
 - d)iii. consider adding reference to OCC's Parking Standard

3.377 A Strategy for Chipping Norton

3.378 A suggestion for Policy CN1 is that it should allow for flexible, sustainable growth, not just "modest" extensions.

3.379 The CNL Board supports the vision but urges stronger commitments to conserve and enhance natural beauty, noting that the town lies entirely within or adjacent to the CNL, limiting expansion. It is recommended that development must avoid sensitive landscapes, minimise light pollution and respect dark skies and key views and that environmental assessments should guide all development within or near the CNL.

3.380 Comments note that bus services have improved in Chipping Norton, however it lacks a rail station and that shuttle services to Kingham have failed. Therefore, there are calls for better bus infrastructure in the town centre and integration with rail services.

3.381 It is also suggested that the town centre faces parking and accessibility challenges. There is support for enhancing active travel routes and improving bus stops and terminals.

3.382 Comments highlight that HGV traffic remains a concern and that rerouting proposals are controversial due to safety and heritage impacts.

- 3.383 Healthcare and education are noted as being under pressure, with comments suggesting that the GP Health Centre needs expansion and that a new primary school may be required.
- 3.384 Comment also suggest that water and sewage infrastructure is strained and that stronger policy wording is needed to ensure delivery.
- 3.385 The lack of local opportunities for youth in terms of education, vocational training, and employment is a major concern. Comments suggest allocating business and employment land and tailoring policies to retain skills and employment locally. This is seen as crucial for sustainable growth and community development.
- 3.386 The need for improved sports, leisure, and community facilities is highlighted. Specific proposals include a football pitch, sports pavilion, and social/community centre. There is criticism of insufficient allocation of land for these purposes in master planning documents and current housing developments.
- 3.387 In regard to tourism, comments suggest that the town centre requires upgrading, with comments emphasising improved pedestrian environments, tourism promotion, and reducing traffic. Suggestions include creating shaded seating, spaces for cafes, and a staffed Tourist Information Point.
- 3.388 There are some concerns regarding over-reliance on large developments and the need for diverse, smaller sites along with concerns about overdevelopment and loss of character. It is suggested that the War Memorial Hospital is underused and could be repurposed.
- 3.389 There is a proposal for Land West of Burford Road, a 31.7 ha site promoted for up to 270 homes.
- 3.390 Multiple comments emphasise the need for increased provision of affordable housing with robust policies to ensure long-term affordability. Additionally, there is a call for more sustainable development practices, including environmental requirements like EV chargers, solar panels, and water conservation features in new housing projects. Ensuring sustainability in retrofits and future developments is seen as critical.
- 3.391 **Key matters arising from feedback:**
- **The most frequent suggestion is to improve and expand public transport - especially bus services – with more frequent and direct routes to nearby towns and rail stations**
 - **To ensure that any new development is supported by strong, sustainable transport links and infrastructure and to enhance walking and cycling routes**

3.392 Chipping Norton Town Centre

3.393 Concerns raised about Chipping Norton Town Centre include safety issues, such as poor air quality, noise, and pedestrian safety, especially in the Horsefair area. Here it is highlighted that the 20-mph speed limit is often ignored and there is a lack of safe crossing points, particularly at New Street and West Street near the Town Hall.

3.394 Recommendations that have been suggested are to adopt a “pedestrian-first” approach to town centre design, improve crossing points on the A44 and enhance public spaces to support walking, cycling, and accessible transport and to implement traffic calming and human-focused design measures.

3.395 It is noted that a bypass road was discussed many years ago and it is suggested that it again be considered.

3.396 It is noted that there is no mention of a parking strategy, which is seen as a gap in the CN2 policy.

3.397 There are some specific recommendations for changes or clarifications to the policy.

3.398 It is suggested to clarify road references as West Street is the A361, not the A44.

3.399 It is also suggested that footfall data (14% decline from January to August 2024) needs clearer sourcing and context and it is recommended that New Street is added to the list of streets needing improvement.

3.400 It has been suggested that the town centre could be enhanced in the following ways:

- Paving improvements
- Clearer signage
- More litter bins
- Better flower beds and green spaces
- Visitor information
- Strategically placed pedestrian crossings
- Improved junction markings and signage
- Better enforcement of speed limits
- Seating and social spaces

3.401 There is support for Chipping Norton Theatre as a cultural anchor for the town and comments encourage collaboration with Theatres Trust for future development.

3.402 A Policy for Bampton

3.403 Comments suggest concerns regarding an ‘infrastructure overload’ in Bampton, including the sewage system being under capacity, causing frequent spills, primary school and GP services are overstretched, poor public transport with high car dependency and issues with traffic and parking.

- 3.404 There are suggestions for improved evening/Sunday services and active travel infrastructure.
- 3.405 There is opposition to large-scale development due to infrastructure strain and heritage concerns, with comments suggesting that only small windfall sites (up to 20 homes) be allowed, with a focus on affordable housing and tenure mix for younger and ageing populations.
- 3.406 Residents express concern over recent growth (~320 homes added outside of the plan-led system). There are fears that further development will “ruin” the village’s character and overwhelm services.
- 3.407 A Neighbourhood Plan partnership would be welcomed to guide future growth.
- 3.408 It is noted that the southern and western fringes fall within Flood Zone 3 and comments highlight that development must avoid high-risk areas and include SuDS (Sustainable Drainage Systems).
- 3.409 Heritage protection is commented on, noting strong conservation constraints and that development must be heritage-led, contextually appropriate, and minimally intrusive.
- 3.410 Developers support medium-scale development (e.g. 200 homes) and claim proposals meet policy criteria of being flood-safe, heritage-sensitive, infrastructure-supportive and emphasise economic, social, and environmental benefits.
- 3.411 **Key matters arising from feedback:**
- **It is frequently suggested that any new development in Bampton must be proportionate to the village’s size and character, and must not overburden existing infrastructure and services, which should be in place before development**
 - **There are repeated calls for new development to respect the historic character, conservation area, and flood risk constraints**
 - **Poor public transport and high car dependency is noted**
- 3.412 **A Policy for Burford**
- 3.413 Some comments suggest that the categorisation is too broad for Tier 2 settlements. It recommends that towns that have good public transport (e.g. a train station and/or public buses and coaches) need to be grouped above other towns like Burford that have limited public transport.
- 3.414 Many comments suggest that Burford’s infrastructure cannot support further large developments. An example includes the Cotswold Gate development, which has already increased housing by 11%, with no corresponding infrastructure improvements.

- 3.415 There are concerns regarding schools and medical facilities, with the suggestion that they are full capacity, with residents being unable to register at the local GP or enrol their children in the local schools, with new development straining these services even further.
- 3.416 Additionally, there are concerns with transport infrastructure. It is suggested that congestion is a major issue, especially on Sheep Street, Tanners Lane, Priory Lane, and the High Street and traffic safety risks are highlighted due to narrow roads, lack of pavements, and increased vehicle movements. Concerns also mention that the River Windrush crossing is dangerous.
- 3.417 Comments note that public transport has improved, however coach and HGV traffic remains problematic and parking is seen as insufficient and poorly managed, with concerns about the impact of a proposed coach/car park.
- 3.418 Some comments acknowledge the importance of improving sustainable transport options, such as walking and cycling links, low-carbon transport solutions, public transport infrastructure, and better wayfinding for visitors. The draft policy BURI suggests enhancements to address these issues, with commenters
- 3.419 recognising the challenges and costs associated with implementing these strategies.
- 3.420 Comments highlight that Burford lies within the CNL and there are concerns about light pollution, loss of dark skies, and impact on biodiversity.
- 3.421 The CNL Board recommends more explicit commitments to conserving the natural beauty of the area.
- 3.422 Many comments argue the proposal contradicts WODC's own policies on sensitive greenfield expansion, sustainability, and heritage protection and the town's historic and architectural legacy is seen as incompatible with large-scale development.
- 3.423 The comments reflect widespread strong opposition to the proposed large-scale development in Burford, particularly on Sheep Street. Residents, local authorities, and conservation bodies emphasise the need for small-scale, sensitive development that aligns with Burford's historic character, environmental constraints, and limited infrastructure capacity.
- 3.424 There is some support for some small-scale development south of the A40, outside of the CNL, if well-integrated, which respects the town's historic character and CNL status. Other comments recommend re-purposing existing buildings and brownfield sites rather than expanding into greenfield areas.
- 3.425 **Key matters arising from feedback:**
- **To limit new development in Burford to small-scale, sensitive projects that respect the town's historic character, tourism, existing infrastructure, and**

the constraints of the Cotswolds National Landscape, limiting development to 10 homes per site, preferably using brownfield land or through infilling

- **Calls for pressure on infrastructure, including roads, GP services, schools and parking to be improved before any more development is allowed to take place**

3.426 Burford Town Centre

3.427 There are concerns about infrastructure in Burford Town Centre.

3.428 Comments note that schools, healthcare and sewage infrastructure are all at maximum capacity and that there are no dentist facilities.

3.429 In regard to transport infrastructure, it is highlighted that congestion is severe, especially on Sheep Street, Tanners Lane, Priory Lane, Witney Street, and the A361.

3.430 It is suggested that coach and HGV traffic pose safety risks, especially near schools and that illegal coach parking is common, with a lack of enforcement due to no traffic warden. Pedestrian safety is also major concern, especially along the A40 and near schools.

3.431 Comments suggest that public transport is poor and there are calls for a rail link or improved bus services.

3.432 Green infrastructure and low-carbon transport (EV charging, community buses) are supported but underfunded.

3.433 Comments suggest that Burford's historic character and CNL status are threatened by overdevelopment. It is noted that the town's heritage sites (e.g., the Priory, Tolsey Building) need preservation and funding with the Town Council criticising WODC and OCC for a lack of funding for key projects and strategic collaboration.

3.434 There are calls for more festivals and cultural events, requiring funding and staff. Some comments suggest that Burford is a short-stay tourist destination but that longer stays need to be encouraged. Comments suggest that indoor leisure facilities are also needed.

3.435 A new community hub is proposed at the recreation ground to replace the unsafe pavilion and there are calls for better wayfinding within the town.

3.436 Key matters arising from feedback:

- **To address traffic congestion, parking, and transport connectivity in Burford—especially through strategic, enforceable solutions that protect residents, improve safety, and support the town's infrastructure before allowing further development**
- **Calls for better collaboration between the Town Council, District, and County Councils to address these issues.**

3.437 **A strategy for Charlbury**

- 3.438 Comments from Charlbury Town Council (CTC) demonstrate support for the draft vision for 2041 and the strategy CHAI, which align with the Charlbury Neighbourhood Plan (CNP). It also welcomes WODC's commitment to work with CTC and the community, but feels the strategy understates Charlbury's importance and challenges.
- 3.439 Charlbury lies entirely within the Cotswolds National Landscape and comments note that development must avoid harm to the landscape and dark skies, include visual impact assessments and respect heritage and conservation areas.
- 3.440 Comments note that Charlbury Rail Station is the busiest station in the district, serving Charlbury, Chipping Norton, and nearby villages and requires better support, including, improved parking, bus connections and walking and cycling access. Suggestions also include contributions from developments to rail infrastructure improvements (e.g. redoubling the North Cotswold Line).
- 3.441 While rail connections are praised, comments suggest that bus services have declined due to their popularity.
- 3.442 There is a recommendation for the vision to reflect walking, wheeling, and cycling and to reference Oxfordshire County Council's Movement and Place Plans.
- 3.443 Comments also suggest that Charlbury's national and international profile is rising. While comments acknowledge that tourism boosts the economy, it also highlights that it places a strain on parking, historic streets and local services and recommends that the Local Plan should reflect these pressures.
- 3.444 There is a call for more for affordable housing and protection of mixed communities with a suggestion that there has been a loss of smaller homes due to extensions and conversion to short-term lets. Comments suggest that it should be ensured that development contributes to sustainable, inclusive growth. Scope for modest growth is acknowledged.
- 3.445 Concerns are raised that there has been a significant loss of retail units to residential use and recommend robust policies to protect retail and allocate employment land.
- 3.446 Comments highlight that Charlbury Community Centre and Nine Acres Recreation Ground host a wide range of sports and activities. These facilities are locally managed but serve a regional audience and there is a recommendation for recognition and support.
- 3.447 **Key matters arising from feedback:**
- **A frequent suggestion is to better support and manage Charlbury's transport infrastructure - especially the rail station (including addressing parking**

challenges and improving bus and active travel connections), bus services, and active travel (walking, cycling)

- **Any growth should be modest, sustainable, and sensitive to the Cotswolds National Landscape**
- **Suggestions to address issues like loss of smaller homes to extensions or short-term lets, and to manage the impact of increased tourism and popularity**
- **See specific comments from the CNL Board**
- **Consider adding reference to OCC's Movement and Place Plans.**

3.448 **A strategy for Eynsham**

3.449 Comments stress the importance of improvements to transport infrastructure but there are concerns regarding this.

3.450 Comments note that the A40 improvement scheme is critical but has been pared back due to cost pressures and that the delivery of bus lanes, Park & Ride, and walking/cycling infrastructure is delayed and lacks transparency. There is support for the re-introduction of the Carterton - Oxford railway but comments highlight that funding and routing remain unclear.

3.451 Comments request measures to safeguard and enhance public transportation infrastructure in Eynsham, including protecting current bus stop locations and frequencies, ensuring new developments do not impair existing transport accessibility, and requiring developer contributions for maintaining or improving bus services.

3.452 There is a strong emphasis from comments on retaining GP services and library in the village centre, rather than re-locating them to Salt Cross. There are also calls for the protection of existing retail, ensuring new developments don't undermine village shops and reflecting aspirations for a vibrant village centre.

3.453 Comments support strategic growth in Eynsham, but insist it must be balanced, sustainable, and community-focused with recommendations that infrastructure must precede housing, and the village's character and services must be preserved.

3.454 There is support for the West Eynsham SDA and Salt Cross Garden Village, which together could deliver 950 homes at West Eynsham by 2041 and 2200 homes at Salt Cross. Oxfordshire County Council (OCC) supports both developments and confirms land availability.

3.455 However, comments also suggest concerns regarding overdevelopment. There are fears of ribbon development along the A40 that could merge Eynsham and Witney, threatening the identity of Barnard Gate and South Leigh. It is thought that large-scale development could damage biodiversity, historic communities, and open countryside.

- 3.456 Several comments express concerns about the impact of additional housing developments on existing environmental constraints, particularly floodplains and standing water issues. There is a call to preserve floodplains as an essential mitigation for the effects of climate change and heavy rainfall. Commenters highlight existing issues with water management in areas near proposed developments.
- 3.457 Some comments suggest specific opposition to development west of Abbey Green, citing flooding risks, infrastructure strain and traffic congestion.
- 3.458 Reference to Oxfordshire's Movement and Place Plans and LCWIP is recommended.
- 3.459 **Key matters arising from feedback:**
- **The most frequent suggestion is to protect Eynsham's village centre services and character and ensure that infrastructure and public transport improvements are delivered before or alongside new development**
 - **To avoid large-scale or ribbon development that would threaten the identity and sustainability of the community**
 - **Reference to Oxfordshire's Movement and Place Plans and LCWIP is recommended**
- 3.460 **A Strategy for Long Hanborough**
- 3.461 The draft vision for Long Hanborough in 2041 is broadly supported, emphasising infrastructure-led, sustainable growth, an enhanced transport connectivity, especially around Hanborough Station and improved active travel options (walking, cycling).
- 3.462 Comments suggest mixed reactions, with some supporting the vision and development for its sustainability and transport benefits.
- 3.463 As a Tier 2 Service Centre, Long Hanborough is seen by some comments as capable of supporting growth due to proximity to Oxford and Witney, with strong rail and bus links and access to employment and services
- 3.464 However, there is strong local resistance to large-scale development without clear infrastructure commitments and protections for the village's character and environment, with many residents opposing Tier 2 classification, citing overdevelopment (33–56% population growth since 2011), strained infrastructure (sewage, roads, parking, GP, school), a loss of village identity and valued landscapes and inadequate public transport and rail capacity. Additionally, concerns about the inadequacy of public transport, especially bus services (S7 and connections to surrounding areas like Eynsham), have been raised.
- 3.465 Comments suggest a risk of losing Long Hanborough's identity, rural character, and separation from the urban sprawl of Oxford.

- 3.466 There are calls for a clear definition of “proportionate growth” and infrastructure improvements before further development.
- 3.467 Supportive comments emphasise the significant transport infrastructure advantages of Long Hanborough, highlighting the range of sustainable transport links to Oxford and London, improved bus services, and Hanborough Station's role as a public transport hub. Discussions include the station's prospects for further enhancements, including the development of a ‘Mobility Hub,’ and the potential for better integration with active travel accessibility and new road/link connections to surrounding areas.
- 3.468 There are also calls for the protection of Pinsley Wood, a local wildlife site, and wildlife corridors with recommendations requiring buffer zones, ecological management and Biodiversity Net Gain commitments.
- 3.469 Recommendations made regarding the strategy for Long Hanborough include an amendment of Policy LHI to allow well-integrated edge-of-settlement development where it delivers community benefits.
- 3.470 An additional recommendation is to ensure development aligns with Salt Cross Garden Village goals and supports active travel links.
- 3.471 It is also suggested that concerns about light pollution, traffic, and ecological impact on the Cotswolds National Landscape are addressed.
- 3.472 Proposed development is suggested on land at Hanborough Station for up to 300 new homes, including affordable housing and potentially a new primary school. The site is 22 hectares, adjacent to existing residential areas, free from major environmental constraints (Flood Zone I, not in Green Belt or National Landscape) and near key services and facilities (schools, GP, pharmacy, shops, churches, business park).
- 3.473 **Key matters arising from feedback:**
- **Any further development in Long Hanborough should be strictly “proportionate” to the village’s existing size and character, with clear limits defined, and must not proceed unless essential infrastructure and services (such as sewage, schools, GP, parking, and public transport) are improved first**
 - **Reconsider or justify the Tier 2 classification for Hanborough as the facilities do not match the status**
 - **Clearly define, numerically, what “proportionate” means**
- 3.476 **Salt Cross Garden Village Settlement Strategy**
- 3.477 There is support for the Salt Cross development, especially its potential to deliver integrated infrastructure (transport, utilities, education, healthcare) and community amenities (leisure, retail, nature, employment). The development is seen as an opportunity to plan holistically from the outset, although there are some frustrations regarding the delays in development.

- 3.478 However, there are concerns about access and movement, especially for sustainable transport modes, for example, Stagecoach have raised issues with the original application's bus strategy.
- 3.479 Additionally, a rail link between Carterton, Witney, and Oxford is considered unfeasible by 2041 and it is suggested that alternative transport solutions are needed.
- 3.480 There is strong support for walking, cycling, and bus links to Hanborough Station, avoiding the A4095 bridge.
- 3.481 It is noted that the development is heavily reliant on the A40 "Smart Corridor" scheme, expected by 2030, though delays are possible.
- 3.482 Comments suggest that geophysical surveys have identified archaeological anomalies, mainly in the southern part of the site. Some areas have undergone evaluation and mitigation excavation (e.g., Park & Ride site) however it is suggested that further archaeological work will be needed as development plans progress.
- 3.483 It is noted that outline planning permission is expected by 2026, with the first homes anticipated by 2030, and 1,800 of 2,200 homes delivered by 2041. It is highlighted that the remaining homes would be built after the plan period.
- 3.484 It is also noted by comments that Salt Cross is intended to meet Oxford's housing needs, not just local demand, with the original plan aiming to deliver 2,200 homes by 2031, but this is now unlikely even by 2041. Therefore, urgent calls for WODC to secure deliverable plots elsewhere to meet Oxford's housing requirements.
- 3.485 Some alternative suggestions from comments include building a new Salt Cross community near Tackley Station, which may offer better rail access than Hanborough and an emphasis on a holistic transport strategy that reflects realistic travel patterns and previous infrastructure planning.
- 3.486 One comment notes that Salt Cross is expected to contribute significantly to employment land supply, which should not be overlooked.
- 3.487 **Key matters arising from feedback:**
- **To ensure that new development at Salt Cross Garden Village (and the wider area) is supported by strong, deliverable infrastructure - especially sustainable transport links (walking, cycling, and bus connections), which is planned and delivered alongside housing**
 - **An emphasis on the need for direct, easy access by pedestrians, cyclists, and buses to Hanborough station, avoiding indirect or unsafe routes**
 - **There are calls to secure deliverable plots to meet Oxford City's unmet needs by 2041, and preferably by 2031**

3.488 A strategy for Woodstock

- 3.489 There are comments about housing growth in Woodstock, noting that Woodstock has already absorbed significant growth, with WOLP3I allocating 600 dwellings, which has now increased to 715 due to appeals and expanded permissions. This represents a 48% increase in housing since WOLP3I which could rise to 72% if Cherwell District Council (CDC) approves a further 500 homes at Perdiswell Farm.
- 3.490 Recommendations are therefore made that no new housing allocations be included in the WOLP4I, focussing instead on integrating existing commitments with development limited to small infill and replacement dwellings.
- 3.491 There are suggestions for better resident involvement in planning through settlement-specific policies and calls for realistic, deliverable policies with dedicated officer resources to monitor and implement them.
- 3.492 Comments suggest concerns about Blenheim Estate's control over development pace and priorities, with slow delivery and commercial interests dominating.
- 3.493 It is also noted that Woodstock is adjacent to Blenheim Palace World Heritage Site (WHS). Comments suggest that further development risks adverse impacts on the WHS's Outstanding Universal Value (OUV), with the ICOMOS Technical Review (2024) raising concerns about development near the WHS.
- 3.494 It is suggested that clearer policy wording is needed to protect OUV through impacts on contributing elements of the setting.
- 3.495 A combined policy for Woodstock and Blenheim to manage shared impacts and responsibilities is suggested.
- 3.496 There is support for active travel infrastructure and reference to Oxfordshire County Council's Movement and Place Plans and an emphasis on sustainable transport and avoiding car-dependent development.
- 3.497 There are also concerns regarding infrastructure deficiencies. Comments suggest that the local GP surgery is "unfit for purpose", with no new facilities proposed and that schools are under pressure with no clear plans for expansion.
- 3.498 Additionally, comments note that no new parking spaces have been added despite a 2016 strategy identifying the need for 150 more and that there is poor maintenance of roads, pavements, and street furniture.
- 3.499 There are recommendations to prioritise infrastructure improvements over expansion.

- 3.500 Comments suggest a criticism of current listed building consent processes, seeing them as barriers to sustainability. A proposal for a Conservation Area policy is made, to manage historic buildings and encourage low-carbon retrofitting.
- 3.501 A recommendation to clarify Woodstock's role beyond a "service centre" to reflect its national and international significance was also made.
- 3.502 **Key matters arising from feedback:**
- **To pause any further large-scale housing allocations for Woodstock and instead focus on integrating and supporting the significant number of homes already allocated but not yet built - by prioritizing improvements to local infrastructure and services (especially health, schools, and parking) before considering any additional development**
 - **Suggestions include creating a "Woodstock Area Policy" to coordinate all aspects of growth, infrastructure, and community needs, rather than treating the town as just another "service centre"**
 - **There are calls for a combined policy for Woodstock and Blenheim to better manage the impacts of both housing and leisure/tourism growth**
 - **The need to protect Woodstock's historic character, its setting next to Blenheim Palace World Heritage Site, and the surrounding landscape**
- 3.503 **Rural Area Strategy**
- 3.504 Comments indicate that there is inadequate consultation and community engagement for development proposals, particularly failure to account for local wishes and existing neighbourhood plans. They call for more proactive engagement with local communities and Parish Councils to ensure development proposals align with their needs.
- 3.505 There are many comments expressing concerns about the classification of tiers.
- 3.506 Tier 3 villages are seen as too varied in size and capacity to be grouped together. There are calls to reclassify smaller Tier 3 villages (e.g., Combe, Ascott-under-Wychwood) as Tier 4 due to limited services and infrastructure.
- 3.507 Tier 4 villages (e.g., South Leigh, Brighthampton) are considered unsuitable for strategic development and it is considered by commenters that it should be protected from speculative proposals.
- 3.508 Many comments highlight overarching concerns. These include infrastructure inadequacy, with suggestions that many villages lack the capacity to support large-scale development, especially in terms of sewage, water, roads, schools, and healthcare.
- 3.509 Additionally, comments indicate that numerous sites are on floodplains or areas with high water tables, raising concerns about surface water runoff, sewage overflow, and property damage.

- 3.510 Transport limitations are also highlighted, with rural roads identified as narrow and congested and public transport is minimal or non-existent, increasing car dependency.
- 3.511 There are many comments regarding the loss of rural character with concerns that developments threaten the historic identity, landscape, and community cohesion of villages.
- 3.512 Other concerns relate to environmental degradation, with worries that development risks biodiversity loss, habitat fragmentation, and light pollution, especially in areas within the Cotswolds National Landscape.
- 3.513 Comments regarding specific villages are noted.
- 3.514 In Standlake, Stanton Harcourt, Sutton and Brighthampton there is strong opposition to proposed developments due to sewage system failures, flooding, traffic congestion, loss of agricultural land and environmental and heritage impacts.
- 3.515 Commenters from Ascott-under-Wychwood have strongly expressed opposition to being classified as Tier 3, citing a lack of basic services and regular flooding.
- 3.516 Comments from residents in South Leigh have emphasised its Tier 4 status and lack of infrastructure however, there are fears of urban sprawl from nearby developments.
- 3.517 Concerns about traffic on the A361 and pressure on Burford's services have been highlighted by commenters from Fulbrook.
- 3.518 Comments further call for clarifications of "local need", with many highlighting that it should mean needs of the specific village, not district wide.
- 3.519 Calls are also made to strengthen protection for Conservation Areas, prioritising brownfield sites, focussing development in areas with existing infrastructure and supporting Neighbourhood Plans, with requests for stronger legal recognition and integration into planning decisions.
- 3.520 The Cotswolds National Landscape Board recommends stronger commitments to conserving natural beauty, with calls for landscape impact assessments, dark skies protection, and biodiversity net gain.
- 3.521 Historic villages like Stanton Harcourt and Sutton are seen by comments as inappropriate for large-scale development due to their listed buildings, views, and ecological value.
- 3.522 Overall feedback reflects widespread opposition to large-scale rural development in West Oxfordshire's villages. Residents and councils urge WODC to focus on sustainable, infrastructure-led growth; protect rural character and heritage; avoid speculative development in Tier 3 and Tier 4 settlements and ensure community-led planning and environmental stewardship.

3.523 Key matters arising from feedback:

- **There is overwhelming objection to large-scale or disproportionate development in rural villages (especially Tier 3 and Tier 4 settlements) unless and until essential infrastructure - particularly sewage, drainage, roads, schools, and healthcare - is demonstrably improved and in place first**
- **Strong opposition to medium or large-scale developments (e.g. 100+ homes) in small villages with frequent concerns about loss of rural identity, landscape, biodiversity, and agricultural land**
- **Requests for clearer definitions of “local need” and “proportionate growth”**

Development Management Policies

3.524 The need for the Local Plan to be based on robust, up to date evidence is highlighted, with the suggestion that the plan period is extended to 2043, to accommodate housing needs, including unmet needs from Oxford City Council.

3.525 One commentor suggests that the Development Management Policies should align with National Development Management Policies, once they have been published. It is also noted that there is a need for consistency with national policy to avoid unnecessarily burdening development delivery.

3.526 The importance of ensuring that Development Management Policies are informed by a Viability Assessment, which has yet to be published, is also noted.

3.527 Additional suggestions include introducing a Public Transport Policy to ensure accessibility and to encourage developers to include an Innovation Plan, aligned with Oxfordshire County Council's Innovation Framework.

3.528 Key matters arising from feedback:

- **To extend the plan to 2043 to accommodate housing needs, including unmet needs from Oxford City Council**

3.529 Policy DMI – Key Principles for New Development

3.530 Many comments express support for the principles of Policy DMI which aim to ensure that new developments are contextually appropriate, respectful of local character and settlement identity and are supportive of sustainability, amenity, landscape and open space.

3.531 Some comments, while supporting the provision of open space, highlight the importance of the role of Neighbourhood Plans in defining Local Green Spaces and emphasise that they should be recognised in this policy.

- 3.532 Comments indicate strong support for preserving settlement identity and protecting local landscapes with the suggestion that local landscapes must be protected with development occurring only in truly exceptional cases.
- 3.533 Several comments indicate that changes be made to strengthen the policy language by removing 'as far as is reasonably possible' from the wording.
- 3.534 There is concern noted regarding some of the terminology and policy clarity used in this policy. It is suggested that the term 'settlement' is too vague, and it is recommended that it is replaced with 'towns and villages' as defined in the settlement hierarchy. It is also considered that the word 'must' is too overly prescriptive for a policy document.
- 3.535 Reference to some elements are thought to be too vague, referencing undefined 'appropriate assessments and plans.'
- 3.536 Comments express strong disagreement in regard to the proposal in section 8.1.9 to remove reference to flood risk, conservation and infrastructure. These issues are seen as critical and should remain central to the Local Plan.
- 3.537 Additionally, recommendations are made to strengthen the focus on these areas, rather than diminish their emphasis in the policy.
- 3.538 Concern is expressed about the cumulative impact of development, with concerns regarding for example, noise, congestion and sewage, particularly in section 8.1.10, where a lack of specific focus is noted. Comments suggest that reference to cumulative impact was included in Policy OS2 of the current Local Plan (2031) and should also be reinstated in the new Local Plan.
- 3.539 It is suggested that there be clearer guidance on developments near sewage infrastructure, with the recommendation that Odour Impact Assessments be required.
- 3.540 Thames Water recommends early engagement to assess infrastructure capacity and avoid adverse impacts on residents and highlights its 'pre-planning service'.
- 3.541 There is some concern that the plan lacks strong reference to safety and accessibility for active travel users with a recommendation that there should be an emphasis on active travel, with policies prioritising walking, wheeling and cycling and that developments should integrate with off-site routes and be accessible by sustainable transport.
- 3.542 One comment supports the policy's acknowledgment of cumulative impacts but refers to concern over developers using sequential small applications to avoid obligations like affordable housing.
- 3.543 Concern is raised about the duplication of this policy with policies on landscape, transport and amenity.

3.544 Key matters arising from feedback:

- **Objection to proposals to delete references to flood risk, landscape, and infrastructure from the policy, arguing these are fundamental to the plan's vision and should be emphasised, not removed**
- **Explicitly address the cumulative impact of successive development (e.g., congestion, noise, sewage, loss of green space), as this is a recurring problem in the area.**
- **Policy wording is too vague or “woolly,” and there are urges for more precise, enforceable language, such removing phrases like “where possible” and “as far as is reasonably possible” to make requirements stronger.**
- **Frequent suggestions to ensure that new development is only permitted where infrastructure (especially sewage, drainage, roads, and services) can support it, and that technical assessments (e.g., odour, flood risk) are required near sensitive sites.**

3.545 Policy DM2 – Green Infrastructure

3.546 Several comments support the principles of this policy, recognising it as comprehensive and ambitious.

3.547 It is noted that the Policy is named ‘Green Infrastructure’ but omits ‘Blue Infrastructure’ and there is a suggestion that the policy should be renamed ‘Green and Blue Infrastructure’ to reflect the environmental importance of water-based ecosystems, particularly in flood prone areas.

3.548 Concern is raised in regard to the policy requirement that around 50% of strategic sites should be dedicated to green infrastructure with several comments indicating that this is too rigid and may conflict with National Policy, housing delivery targets, reduce land efficiency and require viability testing and flexibility based on site-specific constraints. Suggestions are made that more flexibility and site-specific assessments are more suitable than rigid targets.

3.549 Some respondents question the requirement for all major development (10+ houses) to provide a Green Infrastructure Strategy, especially at the outline stage, highlighting that this is ‘overly burdensome’ for smaller ‘major sites’, and suggesting that the threshold should be raised for this requirement.

3.550 It is suggested the requirements of this policy should be extended to employment sites and other large-scale developments using floorspace thresholds and not just residential sites.

3.551 Comments suggest that the current wording of this policy is vague and lacking enforceability. It is suggested that clear and accountable language is used to ensure developers meet green infrastructure goals. An example that is given is that strategic developments must allocate a minimum percentage of site area to high quality, multifunctional green infrastructure, with flexibility only in exceptional cases.

- 3.552 A comment noted that terms such as ‘Strategic Development’ and ‘Green Infrastructure Network’ are not clearly defined. A suggestion is made to provide maps or strategies to guide implementation and clarify expectations.
- 3.553 It is suggested that green infrastructure should be designed to maximise biodiversity and support climate adaptation. A recommendation to include planting plans suited to future climate conditions (hotter summers, wetter winters) is made.
- 3.554 **Key matters arising from feedback:**
- **There are suggestions to include ‘Blue Infrastructure’ in the title**
 - **Comments suggest concern in regard to the policy requirement that around 50% of strategic sites should be dedicated to green infrastructure with several comments indicating that this is too rigid and may conflict with National Policy, housing delivery targets, reduce land efficiency and require viability testing and flexibility based on site-specific constraints. Suggestions are made that more flexibility and site-specific assessments are better than rigid targets.**
 - **Other suggestions for the policy are made**
- 3.555 **Policy DM3 – Sport, Recreation and Play**
- 3.556 Multiple comments emphasise the importance of protecting various sports and recreational facilities, including playing fields, playgrounds, pavilions, ancillary facilities, and car parks, from development.
- 3.557 Comments also stress that policies should provide clarity to protect facilities both indoors and outdoors, regardless of ownership. Additionally, there are recommendations to update strategies to assess current and future needs, taking into account new housing developments and changing demographics, while incorporating guidance from Sport England to ensure alignment with national frameworks.
- 3.558 One comment highlights that SOPM 24 underrepresents the importance of Woodstock Swimming Pool and it is not adequately acknowledged in the policy.
- 3.559 Sports England request that pavilions and ancillary facilities be added to paragraph 1 to ensure, for example that pavilions and car parks on playing field sites are also protected.
- 3.560 It is also suggested that large sites, which have been allocated, are exempt from CIL and instead require Section 106, meaning that contributions can be sought from the developer either on or off sites to invest in meeting the open space, sport and recreation needs from the development on site or providing a contribution to an off-site facility linked to the development.
- 3.561 One comment criticises reliance on the Strategic Outcomes Planning Model (SOPM), which is not suitable for assessing current and future needs and recommends referencing the West

Oxfordshire Indoor Built Facilities Strategy and Sport England's ANOG guidance for proper needs assessment.

3.562 Another comment suggests adding a requirement that facilities be designed in line with Sport England or relevant governing body guidance.

3.563 It is noted that the Indoor Built Facilities Strategy (2022) lacks data on future housing growth and the comment urges updates once housing allocations are finalised to ensure accurate planning for sports and recreation needs.

3.564 One comment suggests that the policy should only refer to open spaces which are accessible to the public and not private uses which the public cannot use.

3.565 It is suggested that requirement 3(c) should be expanded to include all ages, genders, and abilities, ensuring inclusivity in recreational and play facilities.

3.566 One respondent suggests when planning new play areas or recreational spaces, proximity to family homes and existing community facilities should be considered. The comment further suggests that, in densely populated areas with a shortage of nearby facilities, priority should be given to addressing the deficit, even if it means bending standard rules for on-site provision.

3.567 **Key matters arising from feedback:**

- **Sport England request that they are contacted regarding support for the development of this policy**
- **Reference up-to-date needs assessments and strategies (such as the West Oxfordshire Indoor Built Facilities Strategy and Sport England's guidance) to ensure planning decisions are based on current and future needs.**
- **Expand protection to include all types of sports and recreation facilities (indoor and outdoor, regardless of ownership, including pavilions, car parks, and ancillary facilities)**
- **Prioritise addressing deficits in provision - especially in highly populated areas - even if this means flexibility in normal rules for on-site provision**

3.568 **Policy DM4 – A Healthy Food Environment**

3.569 One comment indicates that the policy aligns with the Oxfordshire Food Strategy, which aims to improve public health, tackle climate change, support local jobs and food security and promote circular economy principles.

3.570 Comments highlight the importance of promoting sustainable and local food systems through initiatives like supporting peri-urban farms, local food-growing enterprises, and market gardens.

3.571 Several comments emphasise the importance of community participation in food-growing activities, such as allotments, community gardens, and edible planting in public spaces.

- 3.572 There is a call for strengthening allotment provisions in the policy. Full-size allotments are considered essential for meeting growing demand and supporting food resilience, whereas community gardens are seen as a complementary but insufficient substitute for allotment spaces.
- 3.573 There are some concerns about the requirement for allotments in developments of 50+ homes, with comments indicating that this is seen as too rigid and not always feasible. A suggestion is made to tailor requirements based on local need, site constraints and existing provision.
- 3.574 Another comment suggests that in smaller communities, such as Tier 3 and 4 settlements, where large developments may not arise, no benefit will be provided. A suggestion is made that community garden and/or allotments should be considered or a limited release of council owned land.
- 3.575 Private garden food-growing requirements are viewed as unenforceable and outside of planning control.
- 3.576 Likewise, several respondents argue that some aspirations (e.g., food types sold in stores) are not enforceable through planning. A suggestion is made that focus should be on what planning can control, like space provision and infrastructure support.
- 3.577 There is strong support for working with local farms, peri-urban farms, and small food-growing businesses to engage and educate children.
- 3.578 A comment questions the policy's aim for developments to be within a 10-minute walk of healthy food outlets. It suggests that there is a lack of evidence for the 10-minute standard, it overlooks other access modes such as public transport or cycling and there are some commercial viability concerns.
- 3.579 Comments discuss the need for investment in infrastructure, skills, and people to support sustainable food production. Proposals include food waste processing facilities, abattoir waste recycling, and localised food production systems to tackle climate change and boost food security while supporting good jobs and community well-being.
- 3.580 **Key matters arising from feedback:**
- **Make the policy's requirements for allotments, community gardens, and food-growing spaces more flexible, evidence-based, and practical - focusing on local need, site suitability, and what can actually be delivered through planning.**

3.581 **Policy DM5 – Achieving Net-zero Carbon Development**

- 3.582 Many comments support the overall aim and ambition of achieving net-zero carbon development, with the recognition of the importance of embodied carbon and energy performance and the endorsement of thermal comfort and adaptation measures.
- 3.583 Some comments commend the Council's commitment to ambitious targets for climate resilience and low-carbon development. However, some suggest a phased or flexible approach that considers the supply chain, skills development, and design challenges instead of rigid standards.
- 3.584 Several comments express concern that the targets and methodologies outlined in Policy DM5 introduce unnecessary complexity, exceed national policies, and risk making the policy unworkable.
- 3.585 Consistency with National Policy is questioned, as the Written Ministerial Statement (WMS) from Dec 2023 advises against setting local standards beyond national building regulations. It is suggested that there is a risk of fragmentation and increased costs due to varied local standards.
- 3.586 Other comments raise concerns about the viability of smaller, but still major sites, with concerns that requirements may make developments financially unviable. There is question about the practicality of meeting targets, especially at the outline stage.
- 3.587 An additional comment notes that post-occupancy monitoring every five years is seen as impractical and unenforceable.
- 3.588 Unregulated energy is highlighted and it is noted that developers can't control plug-in loads and targets should focus on regulated energy only.
- 3.589 Specific amendments that are suggested for this policy include the alignment with Future Homes Standard and national regulations, a focus on regulated emissions only, removal or revision of energy intensity targets and carbon offsetting provisions, providing transitional arrangements and phased implementation and the clarification of definitions and applicability (e.g., what qualifies as "major development").
- 3.590 One comment suggests integrating solar photovoltaics (PV) into all new housing developments, indicating the importance of renewable energy sources as part of housing construction to align with sustainability goals.
- 3.591 **Key matters arising from feedback:**
- **Do not set local energy/carbon standards that go beyond national Building Regulations or the Future Homes Standard unless there is robust, costed evidence that it is viable and deliverable. There is strong reference to the December 2023 Written Ministerial Statement (WMS), which says local plans should not set higher energy efficiency standards than national policy unless fully justified. Requests for viability testing and evidence to justify any requirements that go beyond national standards**

- **Many respondents (especially developers and industry bodies) argue that local requirements for net-zero operational carbon, specific energy use targets, and embodied carbon reduction, risk making development unviable or undeliverable, add complexity, cost, and delays, especially if they differ from national standards, should be “stepped” in line with government targets, not imposed immediately**
- **Calls for the policy to focus on “regulated” energy only (not unregulated energy use, which is outside developer control).**

3.592 **Policy DM6 – Renewable and Low Carbon Energy Development**

3.593 Comments indicate broad support for the policy’s goals.

3.594 There is support for dual land use (e.g. agrivoltaics, pollinator-friendly planting) and integrating biodiversity outcomes within renewable energy projects, for example solar farms and other facilities can simultaneously serve as havens for wildlife through features like wildflower meadows, species-rich hedgerows, wetlands, and margins. It is noted that policies should aim to minimise negative impacts on biodiversity while maximising positive outcomes.

3.595 There is support for promoting community-based renewable energy solutions. These comments advocate for smaller, locally managed energy projects, such as local Community Power Stations using renewable energy, as opposed to relying solely on the National Grid. Examples include references to Southill Community Energy and CAPZero.

3.596 It is suggested that the Council must ensure that systems are in place to support a shift from fossil fuels to renewable energy. Comments suggest that policies should adopt a flexible approach to renewable energy development, allowing for site-specific factors, cumulative impacts, and demonstrable benefits to be assessed. One comment stresses that rigid or outdated spatial approaches could hinder West Oxfordshire's net zero goals.

3.597 Several comments emphasise the need to update the Council's evidence base for renewable energy planning, especially the 2016 Renewable Energy and Low Carbon Energy Assessment, which is thought to be no longer reflective of current technology and policy and risks constraining delivery of new renewable energy opportunities. Similarly, other comments suggest the evidence base should be updated to reflect changes in technology, environmental dynamics, and policy priorities. UNESCO has also provided updated guidance that could be utilised in this context.

3.598 A comment suggests that a tiered assessment approach is considered to avoid delays.

3.599 Some comments highlight a perceived lack of clarity within the policy wording. A call is made for clarification of what constitutes “more suitable” vs. “less suitable” areas for development and ‘local benefit’ and a need for clearer mapping and criteria to guide developers and landowners.

- 3.600 Comments stress the importance of protecting high-quality agricultural land when developing solar energy projects. One comment advocates for banning solar panels on Grade 1 and 2 'Best and Most Versatile' agricultural land and for clarification of terminology surrounding 'suitable' land.
- 3.601 One comment points out that the current draft of policy wording does not accurately reflect the National Planning Policy Framework (NPPF). Specifically, it incorrectly states that all renewable generation schemes are inappropriate, whereas the NPPF indicates that many, but not all, could be inappropriate.
- 3.602 Another comment encourages the incorporation of global guidance documents, specifically UNESCO's renewable energy guidelines, to ensure that renewable energy planning aligns with conservation of the historic environment and broader cultural policies.
- 3.603 A comment from the Cotswolds National Landscape Board supports small-scale projects and careful scrutiny in sensitive areas.
- 3.604 **Key matters arising from feedback:**
- **Many respondents say the policy relies too heavily on the 2016 Renewable and Low Carbon Energy Assessment, which is now outdated. They suggest the Council should update its evidence base to reflect current technology, policy, and environmental priorities**
 - **There are repeated calls for clearer definitions of "more suitable" and "less suitable" areas for renewable energy, with transparent mapping and justification so developers and communities understand how decisions are made**
 - **There are frequent suggestions to allow more flexibility, enabling site-specific factors (landscape, cumulative impacts, community benefit) to be weighed, rather than relying on blanket designations**
- 3.605 **Policy DM7 – Retrofitting for energy efficiency, carbon reduction and climate resilience**
- 3.606 Comments indicate broad support for the Council's ambition to promote sustainable retrofitting with a positive reception to the idea of whole building assessments and reuse of materials to reduce embodied carbon.
- 3.607 Some concerns are raised in regard to major developments on the basis that the requirement for site-wide retrofit strategies may hinder phased delivery of projects. A suggestion is made to simplify and make the policy more flexible for developers.
- 3.608 Questions are raised about the lack of evidence base, collaboration, and design guidance promised by the Council.
- 3.609 Concerns are also highlighted in regard to retrofitting in listed buildings. Comments suggest that the current draft may discourage retrofitting due to costly and complex requirements.

- 3.610 Comments express concerns that raised regarding the necessity and practicality of requiring extensive 'whole building' surveys and energy reports for retrofitting projects. Doubts are expressed about the ability of authorities to validate energy predictions and enforce compliance effectively. This process is feared to add additional financial and procedural burdens without offering clear benefits.
- 3.611 A call for a shift from a restrictive to a supportive approach for heritage buildings is made with suggestions of using tools like Local Listed Building Consent Orders to simplify processes and clear guidance on acceptable technologies (e.g. air source heat pumps).
- 3.612 Other suggestions include encouraging innovative retrofit solutions that protect heritage significance and including retrofit measures in redevelopment proposals, supporting those that significantly improve energy efficiency.
- 3.613 **Key matters arising from feedback:**
- **Make the policy more flexible, practical, and supportive - especially for complex sites and listed buildings - by simplifying requirements, providing clear guidance, and enabling innovative, sustainable retrofitting.**
- 3.614 **Policy DM8 – Biodiversity Net Gain (BNG) and Nature Recovery**
- 3.615 Many comments support the vision for biodiversity enhancement and alignment with the Oxfordshire Local Nature Recovery Strategy along with the emphasis on green infrastructure, ecological assessments and nature-based solutions.
- 3.616 There is some perceived ambiguity around what constitutes “ecologically meaningful” and how nature recovery contributions are calculated. Clarification of definitions and implementation mechanisms is also called for.
- 3.617 Comments welcome the prioritisation of the mitigation hierarchy and emphasise the importance of tailoring BNG to local habitats and species, including adherence to strategies like the Local Nature Recovery Strategy. Some suggest expanding the scope to include freshwater habitats and providing clearer definitions of biodiversity impacts.
- 3.618 While some comments welcome the 20% BNG target as ambitious and ecologically meaningful, stressing the long-term benefits of BNG in improving the living environment for residents while benefiting mental and physical health and making communities more pleasant places to live, many strongly oppose the increase from the statutory 10%.
- 3.619 Comments against the increase cite a lack of robust evidence to justify the higher target and highlight viability concerns that higher BNG may reduce developable land, increase costs, and hinder housing delivery, particularly for small and medium sites.

- 3.620 Calls to revert to a statutory 10% BNG target have been made, unless strong local justification is provided or to introduce flexibility, allowing a reduction to 10% if 20% affects viability.
- 3.621 Certain comments support using District Licensing schemes for great crested newts but suggest more clarity and flexibility. Others criticise the mandatory nature of such requirements, proposing alternative approaches for assessing impacts based on specific site conditions. It is perceived that an over-reliance on NatureSpace for newt licensing could create bottlenecks.
- 3.622 One comment highlights that smaller, 'major sites' having to produce reports for smaller sites, such as District Licensing for great crested newts, is excessive and unduly burdensome of sites for example, of 10 or more houses, especially if it must do so in its outline application.
- 3.623 A recommendation to ensure viability testing is completed before finalising the policy is made.
- 3.624 **Key matters arising from feedback:**
- **Many comments strongly oppose an increase of BNG from 10% to 20%, citing a lack of robust evidence to justify the higher target and highlighting viability concerns that higher BNG may reduce developable land, increase costs, and hinder housing delivery, particularly for small and medium sites.**
 - **Clarify which developments must contribute to nature recovery projects, and to allow alternative approaches for great crested newt mitigation, not just the District Licensing Scheme.**

3.625 **Policy DM9 – Waste and the Circular Economy**

- 3.626 Comments suggest general support for the circular economy principles and waste minimisation goals and the inclusion of Construction and Operational Waste Management Plans. Promotion of community involvement (e.g. repair hubs, shared tools) is also supported.
- 3.627 One comment demonstrates support for repair and re-use facilities, expressing strong support for the policy and highlighting the value of repair and re-use facilities, particularly if they include apprenticeships designed to assist young people who are not currently in employment, education, or training (NEETs).
- 3.628 One comment suggests that URS systems are better suited to high-density housing; less practical for low-density areas like West Oxfordshire with the recommendation to remove or revise the requirement for URS in low-density areas.
- 3.629 More clarity and evidence is called for in relation to design and cost implications, compatibility with existing waste collection services and the need for alternative collection

vehicles. Clarification is also requested on reporting expectations, including duration and format.

3.630 An additional concern is regarding the annual reporting requirements for operational waste plans, which are seen as unreasonable and costly.

3.631 Other recommendations include renaming “Waste Management Infrastructure” to “Managing Waste on New Developments” to avoid confusion in addition to treating advanced waste systems as optional, not mandatory, unless justified.

3.632 Including the County Council’s role as Waste Planning and Disposal Authority in supporting text is also recommended as well as ensuring flexibility in implementation based on feasibility and viability.

3.633 **Key matters arising from feedback:**

- **Many responses recommend deleting or softening the requirement for advanced waste collection systems (like underground refuse storage) in strategic developments, which are seen as impractical for low-density housing and may not be used by residents if walking distances are too great. It is suggested that these systems are “encouraged” rather than required, and only where feasible.**
- **There is strong opposition to the policy’s requirement for annual reviews or reports on waste management after occupation.**
- **Several comments suggest the policy should clearly state that Oxfordshire County Council is responsible for waste disposal infrastructure, while the District Council handles collection.**

3.634 **An Enhanced Natural, Historic and Built Environment**

3.635 **Policy DM10 – Conserving and Enhancing Landscape**

3.636 Many comments including the CNL Board and local trustees, support the policy’s goals, with praise for contextual design, protection of key landscape features (e.g. trees, hedgerows, watercourses), use of native planting and green infrastructure, long-term Landscape Management Plans (LMPs) and encouragement of local distinctiveness and historic landscape conservation.

3.637 There are some comments regarding the language of the policy. Suggestions include using clearer, more honest language to avoid “developer doublespeak”. Phrases such as “conserving and enhancing landscape character through new development” are seen as confusing or misleading.

3.638 Some concern is raised that the policy only applies to major developments with a recommendation that requirements be extended to smaller developments that could impact landscape character.

- 3.639 One comment highlights that smaller, 'major sites' having to produce reports such as a Landscape Character Assessment and a Landscape Management Plan, is excessive and unduly burdensome, especially if it must do so in its outline application.
- 3.640 In regard to design expectations, comments suggest that development should integrate with local scale, form, and materials; avoid dominating views or skylines; include contextual analysis (e.g. Constraints & Opportunities Plans) and use native planting and retain existing landscape features.
- 3.641 There is some dissatisfaction with developers failing to build homes that conform to local character, leading to oversized, overpriced houses that remain empty.
- 3.642 There is a strong call for robust enforcement of the policy, including developers being held accountable for design failures and required to correct mistakes.
- 3.643 One comment suggests using LVIA for major developments and LVA for smaller ones, depending on location and impact.
- 3.644 An explanation of the distinction between LCA, LVIA, and Landscape and Visual Appraisal (LVA) is called for.
- 3.645 In regard to infrastructure, it has been highlighted that any development increasing traffic must address pedestrian safety, vehicle congestion, and speeding risks.
- 3.646 A request has been made to include specific references to neighbourhood plans (NPs) in policies to ensure alignment with localized needs and strategies.
- 3.647 **Key matters arising from feedback:**
- **Clearer policy wording and clarification of the differences between documents are requested**
 - **There is a strong call for robust enforcement of the policy with developers being held accountable for design and required to correct mistakes**
- 3.648 **Policy DM11 – Trees and Hedgerow**
- 3.649 Supporters of this policy appreciate the focus on tree and hedgerow integration in development design, biodiversity gain, long-term management, and connectivity
- 3.650 One comment raises concerns about the practicality and feasibility of implementing the tree and hedgerow replacement policy. It argues that the mandated replacement ratios (2:1 for trees and 3:1 for hedgerows) may not be viable, especially for small brownfield sites, and could compromise sustainable development. It suggests the policy goes beyond NPPF requirements and calls for more flexibility or deletion of this element. It is suggested that ratios and biodiversity requirements are not well justified or supported by data.

- 3.651 Additionally, it is highlighted that trees gain biodiversity value over time, making immediate replacement equivalence difficult.
- 3.652 Duplication with existing Biodiversity Net Gain (BNG) legislation is noted which is thought may cause confusion or redundancy.
- 3.653 One comment critiques the alignment of Policy DMI I with the NPPF. While the NPPF emphasises the importance of trees in urban environments and calls for their integration into developments, it stresses deliverability and realistic policies. The comment indicates that the current tree and hedgerow replacement requirements are overly stringent and exceed NPPF expectations.
- 3.654 Individual comments have noted some recommendations for this policy. These include introducing flexibility or considering off-site compensatory planting, the use of CAVAT (Capital Asset Value for Amenity Trees) for high-value trees, expanding scope to include all habitats, aligning with the Local Nature Recovery Strategy (LNRS), the inclusion of ancient woodland and veteran tree protections, referencing NPPF para 193c, encouraging native species, climate resilience, and biosecure UK sources and considering green roofs and tree canopy growth projections for long-term planning.
- 3.655 **Key matters arising from feedback:**
- **Several comments suggest that the policy exceeds the requirements of the NPPF**
 - **It is considered that this policy is a duplication with existing BNG legislation which is thought may cause confusion**
- 3.656 **Policy DM12 - Light Pollution and Dark Skies**
- 3.657 Many comments express support for policies that protect dark skies, such as the Cotswolds National Landscape initiative to create a Dark Skies Reserve.
- 3.658 One comment welcomes the text in Policy DM12, with particular enthusiasm for provisions that aim to minimise the impact on biodiversity. This indicates strong support for ensuring environmental protections are central to the policy.
- 3.659 There is a call to support local town and parish level dark sky designations to ensure the policy aligns with localized aspirations, with Parish Councils advocating for stronger protections and clearer implementation.
- 3.660 The comments emphasise the importance of protecting river corridors and watercourses as dark ecological networks. These linear habitats support nocturnal species like bats and are highly vulnerable to light intrusion, which can result in ecological fragmentation and behavioural disruption. The recommendation includes explicit reference to river corridors within policy frameworks and proposes standards for outdoor lighting to preserve nighttime conditions.

- 3.661 Comments highlight that the policy refers to “designated dark sky areas” but lacks clarity on their location or mapping. A suggestion to include a Dark Skies Map and support Dark Skies Reserve initiatives (e.g., Cotswolds National Landscape) is made.
- 3.662 There are some comments which suggest that policy lacks clarity on definitions (e.g., “significant light pollution” and “dark sky areas”) which are considered undefined, and vague language such as 'near' creates difficulties for implementation. Suggestions include using recognized mapping to define protected areas and adding explanatory paragraphs to provide clarity on reducing light pollution and enhancing natural beauty.
- 3.663 One comment suggests that there is duplication and repetition across the sections of the policy and call for it to be simplified.
- 3.664 Another comment calls for the need for proactive measures to reduce existing light pollution, not just prevent new sources.
- 3.665 Sport England objects to the policy, arguing that it does not adequately address the needs for sports lighting, particularly in rural districts, to enable outdoor sport and physical activity during winter months. They emphasise that lighting is essential for safety and accessibility, including for individuals with visual impairments. The comment highlights a potential conflict between the Council's commitment to dark sky preservation and its objectives to support active lifestyles.
- 3.666 **Key matters arising from feedback:**
- **Significant feedback is given from the CNL Board and Sport England – see specific comments**
 - **Specific definitions of wording have been requested**
- 3.667 **Policy DM13 – Air Quality and Pollution**
- 3.668 There is broad support for this policy, with one comment ‘greatly welcoming the text.’
- 3.669 A specific change which was suggested by one comment is to add ‘Zero-emission transport (buses, trains etc.)’ to Policy text – 3b.
- 3.670 An additional suggestion relates to the section where the policy states that “all new development in West Oxfordshire must be designed and located to ensure it does not cause or contribute to poor air quality and is not at risk from existing sources of air pollution”. It is suggested that this wording should be amended to refer to unacceptable or significant adverse impacts on air quality.

3.671 One comment highlights the unduly burdensome effect that the information required has on smaller sites which are classed as 'major' (10+). They indicate that the requirement to complete an Air Quality Impact Assessment, in addition to a Construction Environmental Management Plan, particularly during the outline stage of the application and could hinder development.

3.672 Key matters arising from feedback:

- **Policy wording changes are suggested**

3.673 Policy DM14 – Listed Buildings

3.674 The policy is broadly supported by the CNL.

3.675 Comments suggest the wording of the policy is inconsistent with the National Planning Policy Framework (NPPF). It states that the NPPF requires consideration of the extent of harm (substantial or less than substantial) and a weighing of harm against benefits.

3.676 The balancing approach is not clearly provided for in part I of Policy DM14, leading to potential internal inconsistency. The recommendation is for the Council to revise the policy to align more closely with national guidance and avoid contradictions.

3.677 Key matters arising from feedback:

- **Changes are suggested to ensure that it complies with the NPPF**

3.678 Policy DM15 – Conservation Areas

3.679 The CNL broadly supports this policy.

3.680 Comments note that Policy DM15 concerns development affecting the significance of Conservation Areas, including their setting and appearance. The comments believe that Part I of DM15 is inconsistent with the National Planning Policy Framework (NPPF), which requires assessing the extent of harm (substantial or less than substantial) and weighing harm against public benefits. It is perceived that this balancing approach is missing in Part I of DM15, though it appears elsewhere in the policy and the comments recommend that the Council revise DM15 to avoid internal inconsistency and align with national policy.

3.681 It is noted that no Conservation Area appraisal exists for Charlbury, and there is a call for its imminent production. Due to this absence, the Charlbury Town Council (CTC) had to commission its own Parish Character Assessment, which it invites the West Oxfordshire District Council (WODC) to use.

3.682 Key matters arising from feedback:

- **Several respondents highlight that part I of Policy DM15 refers to setting and appearance, but does not explicitly require the “weighing of harm against benefits” as set out in the National Planning Policy Framework (NPPF)**
- **There are suggestions for the need for up-to-date Conservation Area appraisals to support decision-making.**

3.683 DM16 – Archaeology and Scheduled Monuments

3.684 Minerals and Waste - This comment suggests that it should be made clear it applies to District applications only. Mineral workings may affect archaeological remains and therefore “conserve” is too strong and restrictive for this type of development. If it is to apply to all developments then the comment advises that it should be amended to “Development proposals affecting archaeological remains must give great weight to conserving or enhancing...”in accordance with the NPPF.

3.685 With regard to the draft policy wording, one comment suggests that loss or substantial harm to a designated heritage asset, or a non-designated heritage asset of equivalent significance to a scheduled monument should be wholly exceptional. Such assets would need to be preserved in situ as standard and substantial public benefits would need to be clearly set out to justify such a loss. This should be highlighted within this policy rather than preserving in situ where possible.

3.686 The comment additionally suggests that for Mitigation and Publication – b) the programme of archaeological investigation should also be covered by a written scheme of investigation (WSI), and it is this WSI that will need to be submitted to and approved by the LPA and this policy should make this clear to avoid any confusion or delays in the planning system.

3.687 Key matters arising from feedback:

- **Several changes are suggested, including to ensure that it is compliant with the NPPF**

3.688 Policy DM17 – Registered Historic Parks and Gardens

3.689 The CNL supports this policy.

3.690 One comment suggests that it should be made clear it applies to District applications only. Minerals and waste applications may impact registered historic parks and gardens and their setting and therefore “conserve” in bullet I is too strong and restrictive for this type of development and could prevent or hinder the future working of mineral resource. This is not in accordance with the NPPF or Minerals and Waste Local Plan Core Strategy.

3.691 Key matters arising from feedback:

- **Suggested changes are made to ensure that the policy is in accordance with the NPPF and the Minerals and Waste Local Plan Core Strategy**

3.692 DM18 – Conversion, Extension and Alteration of Traditional Buildings

3.693 The CNL supports this policy.

3.694 One comment suggests that the proposed policy wording does not explain what is meant by a ‘traditional’ building and so has the potential to be misapplied.

3.695 A further comment suggests integrating this policy with DM19 by supporting the creation of local lists of non-designated assets, referencing Charlbury Neighbourhood Plan’s approach.

3.696 Key matters arising from feedback:

- **The definition of ‘traditional building’ is requested**
- **A comment suggests integrating this policy with DM19**

3.697 DM19 – Non-Designated Heritage Assets

3.698 The CNL supports this policy.

3.699 Support is given by one comment that there is a policy specifically for non-designated assets.

3.700 Another comment suggests that care should be taken to ensure that non-designated heritage assets are not elevated to the same status as designated heritage assets and it is suggested that the policy wording should be clearer on this point.

3.701 A further response asked if it could it be made clear that where an application being submitted affects non-designated remains, any archaeological investigation must be in line with a Written Scheme of Investigation approved by the OCAS.

3.702 Key matters arising from feedback:

- **As above**

3.703 Policy DM20 – Town Centres

3.704 The CNL broadly support this policy, in particular the aspiration to promote and protect the long-term vitality, viability, and resilience of the CNL towns of Chipping Norton and Burford. It is suggested that this should be done in a way that is compatible with the purpose of conserving and enhancing the natural beauty of the CNL.

3.705 One comment suggests that that Charlbury town centre should now be included as a result of the recent rapid expansion of Charlbury’s tourist role, due to its rapid desirability to visit and stay, increasing pressures on Charlbury. The commenter believes that the increase in

tourism warrants the inclusion of Charlbury within this proposed Town Centres policy to ensure that the town can continue to serve the increased tourism need.

3.706 A further comment highlights the importance of rail accessibility for maintaining town centre vitality. It suggests that challenges identified include parking constraints, car dependency undermining sustainability.

3.707 **Key matters arising from feedback:**

- **To improve town centre vitality by prioritising sustainable transport access - especially rail connectivity - and to ensure that new transport links (like rail stations) are directly integrated with pedestrian and cycle routes to the town centre.**

3.708 **Policy DM 21 – Previously Developed Land and Development Densities**

3.709 Comments support the principles of Policy DM21.

3.710 One supports prioritising brownfield (previously developed) land for new development and encourages efficient land use with sustainable housing density. A suggestion is made to introduce density targets of 70 - 100 dwellings per hectare, which they believe to be achievable with good design.

3.711 Comments suggest that the policy and its supporting text do not mention re-use of brownfield land in rural areas, showing a lack of proactive planning for rural communities. It further suggests that failure to reuse such land may lead to unnecessary allocation of greenfield sites, especially given the 6,500 housing shortfall.

3.712 Proposed improvements to the policy include adding a paragraph after 8.4.13 prioritising brownfield land reuse in rural areas if it benefits the rural economy and infrastructure. Additional proposals for improvement suggest adding a new clause to Policy DM21 supporting rural brownfield reuse if it:

- Avoids significant environmental harm.
- Supports regeneration and sustainable communities.
- Improves rural infrastructure.
- Follows a 'cluster village' approach.

3.713 **Key matters arising from feedback:**

- **Priority of the reuse of brownfield sites in rural areas is suggested**
- **Proposed improvements are suggested**

3.714 **Policy DM22 – Re-use of Residential Buildings**

3.715 The CNL supports this policy.

3.716 **Policy DM23 – Protection and Provision of Community Facilities**

- 3.717 There is broad support for this policy, particularly for protecting community facilities such as pubs, churches, healthcare centres, libraries, and shops, along with the sequential approach to alternative uses.
- 3.718 One comment strongly supports the inclusion of places of worship in the list of protected facilities, with a recommendation to amend supporting text to explicitly mention “churches and buildings for faith and worship.”
- 3.719 Some comments call for clearer clarification of elements of the draft policy, to avoid contentious interpretations.
- 3.720 These include clearer criteria for assessing the economic viability of pubs, clarification of the sequential approach and its impact on statutory duties, for terms like “larger strategic-scale developments” to be defined, to ensure Community Infrastructure Statements are proportionate and evidence-led and the rewording of the requirement for replacement facilities to be operational before closure.
- 3.721 Further clarification is sought by a comment that certain provisions (e.g., bullet 5) do not apply to minerals and waste applications.
- 3.722 Comments stress the need to refine policy DM23 to address issues like economic viability, community-owned enterprises, and unethical practices by owners. Specifically, suggestions include requiring longer trading accounts to avoid misuse and enhancing provisions for community-run enterprises and the Community Right to Bid process.
- 3.723 A further comment calls for flexibility in marketing and viability evidence requirements.
- 3.724 A comment from NHS Property Services (NHSPS) indicates support for community facilities but raises the following concerns:
- 3.725 Policy may delay NHS estate disposal, affecting reinvestment in healthcare.
- 3.726 Requests flexibility for surplus NHS sites to be repurposed without needing community use retention.
- 3.727 Proposes specific policy wording to reflect NHS operational needs.
- 3.728 **Key matters arising from feedback:**
- **Multiple respondents suggest that the policy should allow for different types of evidence (not just marketing) to demonstrate that a facility is no longer viable, necessary, or in active use**
 - **There are repeated calls for more flexibility in the timing and requirements for providing replacement facilities, rather than insisting they must be operational before the existing facility is lost**

- **Several comments recommend clearer criteria for the sequential approach to alternative uses, and suggest prioritising reversible or compatible uses to allow for future return to original community use**
- **Explicitly include places of worship and faith buildings in the list of protected community facilities.**

3.729 **Policy DM 24 – Active and Healthy Travel**

- 3.730 Comments show strong support for promoting walking, cycling, and active travel, with some comments indicating that it also aligns with local Neighbourhood Plans. This includes securing walking and cycling routes and enhancing connections between communities and service centres. It is noted that any requirements to meet this policy should be proportionate and viability tested.
- 3.731 One comment suggests a change of policy wording, with the requirement for all developments to meet criteria (a) - (e) seen as too rigid. The suggested change is “New development proposals should, **where possible**,” to allow flexibility based on site constraints.
- 3.732 The addition of “wheeling” (e.g., for wheelchair users) between walking and cycling in relevant sections is also recommended.
- 3.733 A further comment requests that it is ensured that section 2 applies only to District Applications, not minerals and waste sites.
- 3.734 The integration of active travel with railway stations has been recommended with suggestions for secure cycle parking (minimum 100 spaces per station), safe walking/cycling routes to residential areas, integration with bus services and car clubs and direct connections from developments within 2km of planned rail routes.
- 3.735 A comment notes that the current wording of the policy conflicts with Paragraph 110 of the NPPF, which acknowledges that sustainable transport solutions vary between urban and rural areas. It concludes that the policy must be amended to be considered sound at the Regulation 19 stage.
- 3.736 Additional recommendations that are suggested include reference to LCWIPs, SATN, and Movement and Place Plans, inclusion of alternative bike parking (e.g., for cargo bikes and tricycles) and consideration of School Streets, Park and Stride, and deprivation reduction measures.
- 3.737 Concern is raised regarding active travel in rural areas with safe walking/cycling routes between villages noted as often non-existent or unsafe. It is suggested that external connections may be undeliverable due to third-party land ownership.

3.738 Key matters arising from feedback:

- **Many respondents support the overall aim of promoting active and healthy travel (walking, cycling, etc.), but repeatedly suggest that the policy is too rigid. The most common recommendation is to amend the policy wording so that new developments should meet the criteria for integrating active travel networks “where possible” or “where achievable and appropriate to the context of the site” rather than requiring every development to meet all criteria regardless of site-specific constraints**
- **The policy should recognise that sustainable transport solutions will vary between urban and rural areas (as per national policy)**

3.739 Policy DM25 – Parking Standards (Car and Cycle Parking)

3.740 Comments indicate general support for this policy.

3.741 Comments also indicate several recommendations for this policy.

3.742 The first recommendation relates to Part 6 of the policy which is deemed unnecessary as this is set out in Part S of the Building Regulations. It is also thought un-sound for the plan to require development to be in accordance with policies set out in documents that are not development plan documents.

3.743 These are not prepared in the same way and as such can be changed without the level of scrutiny that is afforded to a local plan policy, and it is inappropriate for development to be required to meet these standards. It is therefore recommended that part 6 of the policy is deleted.

3.744 A link is suggested to be added to OCCs Parking Standards for New Development document in the parking strategies section. The commenter also suggests that it may also be worth discussing the ‘Oxfordshire Street Design Guide’ as a future revision of the Oxfordshire Street Design Guide which will also include a kerbside strategy, touch on loading, servicing etc.

3.745 One comment suggests that the policy requirements at 7) and 8) are unclear and that the wording should be reviewed to provide clarification.

3.746 Another comment suggests that cycle parking for new development should always incorporate e-bike charging facilities.

3.747 A further comment notes that overly restrictive parking standards could impact marketability and delivery of housing.

3.748 Key matters arising from feedback:

- **Multiple comments request that the wording of the policy (especially requirements 7 and 8) should be reviewed and clarified to avoid confusion**

- **There are repeated suggestions to avoid overly restrictive or prescriptive standards, particularly regarding parking requirements, as these could impact the marketability and delivery of housing**
- **Several comments highlight concerns about requiring compliance with standards set out in documents that are not part of the formal development plan, as these can change without proper scrutiny.**

3.749 Policy DM26 – Windfall Housing

- 3.750 Many comments support the proactive approach to windfall housing, especially its role in meeting housing supply targets. The policy’s “brownfield first” principle is widely welcomed.
- 3.751 There is also support for integrating affordable housing into windfall developments, especially in areas with high need.
- 3.752 The CNL supports the requirement for evidence of local housing need in Tier 3 villages and within the CNL. Multiple comments express their concerns over speculative planning applications related to windfall housing on unallocated sites. Some believe the policy opens loopholes for speculative development, particularly in smaller settlements (Tier 3 and Tier 4 villages) like Ascott Under Wychwood and Aston. Others feel that Tier 3 settlements should adopt more restrictive approaches, similar to Tier 4 settlements, to prevent speculative planning issues.
- 3.753 However, other comments indicate that requiring evidence of local housing need in Tier 3 villages and the CNL is too restrictive and that not all Tier 3 villages have Neighbourhood Plans, making it difficult to demonstrate need. A suggested revision is to apply the requirement only to undeveloped land adjoining built-up areas, not to brownfield or infill sites. Calls for more flexibility in policy wording to allow small-scale developments in villages without excessive restrictions are also made and an emphasis on supporting smaller housebuilders.
- 3.754 Comments stress that windfall housing developments, whether on Brown/Grey field sites or for infill, should align with the character of the local area and be sensitive to the unique needs of smaller villages and landscapes.
- 3.755 Some respondents find the policy language vague or contradictory, especially around the treatment of brownfield vs greenfield sites. Requests for clearer definitions and more consistent application of criteria are made. It is felt that placing all sites under the 'windfall' banner leads to concerns about vague, contradictory language that could be exploited.
- 3.756 Concerns are raised that the policy lacks a strategic sequential test for flood risk, making it inconsistent with the NPPF. A Strategic Flood Risk Assessment (SFRA) is therefore recommended to justify the development strategy.

3.757 Some object to the phrase “will be supported positively,” fearing it encourages speculative applications. A suggested recommendation is to clarify or remove this wording to ensure all proposals are assessed on merit and suitability.

3.758 Parish councils stress the need to consider local infrastructure capacity and public transport links. A suggestion is to prioritise housing for local people and ensure developments are sustainable.

3.759 Key matters arising from feedback:

- **Many respondents request that the wording of Policy DM26 be clarified, especially regarding when and where windfall housing will be supported, and what evidence is required for local housing need**
- **Multiple comments object to the phrase that windfall housing “will be supported positively,” arguing that this could encourage speculative applications and make it harder for the council to refuse inappropriate developments.**
- **There are repeated suggestions to either remove or clarify the requirement for evidence of specific local housing need in Tier 3 villages and the Cotswolds National Landscape, as not all villages have Neighbourhood Plans or clear ways to demonstrate need**

3.760 Policy DM27 – Creating Mixed and Balanced Communities

3.761 Comments indicate broad support for the objective of delivering a mix of housing types, sizes, and tenures to meet local needs and the indicative nature of housing mix requirements is welcomed, allowing flexibility based on site-specific factors.

3.762 Some concern is raised regarding standards M4(2) and M4(3), firstly regarding the ambiguity in wording, with a suggestion that it is unclear how developers should respond to the “subject to negotiation” clause.

3.763 Comments also suggest some viability concerns, with M4(3) homes requiring more land and cost, potentially reducing overall housing delivery and it is felt that there is no clear justification for the 5% requirement or for applying M4(2) universally, proposing 'up to 5%' instead. Calls for more flexibility are made, especially for developments where M4(2) is not technically feasible (e.g., upper-floor flats without lifts).

3.764 It is noted that the Local Housing Needs Assessment (2025) identifies 340 households needing to move to more suitable homes and 4,753 households potentially needing adaptations, but with many who may prefer modifying existing homes. Some comments argue that this does not justify requiring all new homes to meet M4(2) standards.

3.765 Commenters also discuss the broader implications of requiring adaptable housing standards for older persons, noting that universal adaptable standards like M4(3) may not fully address specific housing needs for the elderly. They argue that overly institutionalised housing standards could reduce independence for older adults and request careful consideration of the policy's impact on this demographic.

- 3.766 Multiple comments stress the need for robust viability testing of accessibility standards. Reference is made NPPF Paragraph 58 and PPG guidance on ensuring policies are realistic and deliverable.
- 3.767 Comments suggest that developers object to fixed market housing mix as these are not justified by evidence and not responsive to market or site-specific conditions. A suggestion is made to cap large (4-5 bed) homes instead of a prescribed mix.
- 3.768 In Tier 3 communities, where major developments are rare, it is suggested to apply housing mix and accessibility requirements to smaller developments (e.g., 5+ homes).
- 3.769 An emphasis on smaller 1–3-bedroom homes is also suggested to counter home extensions skewing stock toward larger homes and the conversion of small homes to holiday lets, reducing availability.
- 3.770 **Key matters arising from feedback:**
- **Many respondents request that the policy wording - especially around the requirement for all new homes to meet Part M4(2) (accessible and adaptable dwellings) and at least 5% to meet M4(3) (wheelchair adaptable) - should be clearer and less ambiguous. There is confusion about what is required, when, and how much flexibility exists**
 - **There are repeated calls for the policy to allow for exceptions where it is not viable, technically achievable, or appropriate to require all homes to meet these standards. Respondents want the policy to recognise site-specific constraints and viability issues**
 - **Several comments question whether the evidence justifies the proposed requirements, especially the increase from previous standards. They suggest the policy should be based on up-to-date local needs and viability testing.**
- 3.771 **Policy DM28 – Affordable Housing**
- 3.772 Comments indicate broad support for the principle of increasing affordable housing in West Oxfordshire, with many agreeing with the 40% benchmark for affordable housing in market-led schemes.
- 3.773 However, other comments suggest that the 40% requirement may not be viable across all areas, noting that no viability assessment has been published yet, making it difficult to judge whether the policy is justified. Comments suggest a review the 40% target once viability evidence is available or reintroduce a zonal approach (e.g., 50% in high-value areas, 35% in low-value areas like Carterton). They also suggest amending policy language to say proposals that “meet or exceed” the 40% requirement will be positively considered.
- 3.774 One comment suggests increasing affordable housing requirement to 50% in the CNL and a stronger aspiration for 100% affordable housing on rural exception sites.

- 3.775 There are calls for a clearer definition of “affordable housing”, especially distinguishing it from social housing.
- 3.776 Comments indicate a strong recommendation to separately assess viability for older persons housing, suggesting that generic affordable housing targets may not be appropriate for specialist schemes with communal facilities. A suggestion for exemptions or tailored policies for older persons housing is made.
- 3.777 There is some support for flexibility in allowing off-site contributions or financial payments where on-site provision is unfeasible and a request for clearer guidance on what constitutes “unfeasible.”
- 3.778 One comment calls for affordability to be based on income ratios, not just market discounts, citing that ONS data shows house prices are nearly 11x average earnings in West Oxfordshire with over 2,100 households are on the housing register.
- 3.779 Several comments express strong support for rural exception sites as a mechanism for delivering affordable housing in rural areas. They recommend flexible wording and modifications to better align policies with local needs and national frameworks, as well as ensuring rural exception sites serve closely related communities. Concerns are raised about the financial viability of smaller schemes and restrictive requirements (e.g., proximity to primary schools), which could block housing provision in rural communities.
- 3.780 However, comments express concern regarding ambiguity between RES and Community-Led Housing (DM31) with confusion about the difference between the two.
- 3.781 Environmental concerns such as flooding and constraints related to the CNL are raised in the context of allocating homes in certain tiers. Comments also express concerns about anticipated strain on infrastructure, such as increased congestion due to meeting housing needs for neighbouring cities.
- 3.782 A comment emphasises factoring in affordable housing for NHS and care staff and suggests collaboration with Integrated Care Boards (ICBs) and NHS Trusts to identify housing needs near healthcare facilities.
- 3.783 **Key matters arising from feedback:**
- **Viability assessments are called for, with a review of targets when these are available, particularly in areas like the CNL**
 - **Several other recommendations for policy changes are made**
- 3.784 **Policy DM29 – Specialist Housing for Older People**
- 3.785 Comments indicate support for this policy, recognising the importance of meeting older people's housing needs in line with NPPF paragraph 63, acknowledging the role of such housing in enabling downsizing, freeing up homes for younger families and emphasising integration, social inclusion, and affordability.

- 3.786 However, other comments suggest that the policy is not fully justified or supported by viability evidence. They indicate that the 300-dwelling threshold lacks viability testing and that large care facilities may make sites unviable.
- 3.787 Comments highlight that Policy DM27 already requires all new homes to be accessible/adaptable (Part M(4) Cat 2), which may reduce the need for separate specialist housing. A suggestion is made that bungalows or ground-floor apartments are suitable alternatives for older people.
- 3.788 Another comment suggests that the policy overlooks care villages and a recommendation is made to recognise these as a valid model.
- 3.789 Other comments suggest that this policy needs clearer links to the Specialist and Supported Housing Needs Assessment and other policies (DM26, DM27, DM28, DM31, DM34). A clarification of what constitutes “valid reasons” for not including specialist housing is also requested.
- 3.790 One comment calls for an explicit reference to conformity with policies in Neighbourhood Plans.
- 3.791 **Key matters arising from feedback:**
- **There is support for this policy, with recognition of the importance of meeting older people’s needs**
 - **However, viability evidence is requested and other policy changes are suggested**
- 3.792 **Policy DM30 – Custom and Self-build Housing**
- 3.793 Support for this policy highlights its alignment with the National Planning Policy Framework (NPPF), which encourages opportunities for self-build and community-led housing.
- 3.794 However, some comments raise concerns about the policy.
- 3.795 It is suggested that there is no clear evidence in the Local Plan to justify the 5% requirement. Additionally, comments suggest that the Council’s self-build register is not means-tested and lacks detail on genuine intent or ability to build. It is suggested that this may overprovide for self-build housing relative to actual demand and calls are made for the need for the requirement to be tested for viability and feasibility, especially on large sites. A revision or removal of the blanket 5% requirement is recommended.
- 3.796 It is also suggested that it is unclear if self-builders want plots within large volume housebuilder sites and that it would be better suited to dedicated small sites or windfall sites.
- 3.797 Comments also suggest concerns that the requirement could affect delivery of market and affordable housing and may compromise design cohesion and infrastructure planning.

3.798 Comments highlight the challenges of self-build housing, citing that it is difficult to manage self-build plots within large developments due to health and safety risks, construction phasing conflicts and potential delays or incomplete plots. It is suggested that the 12-month marketing period for self-build plots is too long and that a shorter period would reduce delays and allow quicker reallocation if no interest.

3.799 Other suggestions include the use of Council-owned land, allocating specific sites for self-build or supporting market-led supply on windfall sites.

3.800 One commenter highlights the need for the policy to explicitly align with relevant Neighbourhood Plans, suggesting a specific reference to these Neighbourhood Plans to ensure conformity.

3.801 **Key matters arising from feedback:**

- **Policy changes are recommended, particularly in regard to a revision or removal of the blanket 5% requirement.**
- **Comments question whether the requirement will have an impact on market/affordable housing and would be better suited to windfall/smaller sites**

3.802 **Policy DM31 – Community-Led Housing**

3.803 There is support for this policy and the concept of community led housing.

3.804 However, comments call for more clarity on how community-led sites differ from rural exception sites, particularly regarding what makes a site suitable for one scheme but not the other. It suggests that current wording introduces ambiguity and proposes that subsequent versions of the Local Plan address this issue.

3.805 One comment suggests that the policy should explicitly commit to consulting local communities and parish councils and take into account existing Neighbourhood Plans, which reflect resident input.

3.806 Viability challenges have been identified by some comments such as success being dependent on landowners willing to release land at affordable prices. It is suggested that the inclusion of lower-cost homes for sale (e.g., First Homes) may help viability and that affordability must be secured in perpetuity via legal agreements.

3.807 **Key matters arising from feedback:**

- **Policy wording changes are suggested**
- **Clarification is required regarding the difference between community-led sites and rural exception sites**

3.808 Policy DM32 – Meeting the needs of Travelling Communities

- 3.809 Supportive comments for this policy suggest that it recognises the distinct housing needs of travelling communities and encourages integration into planning to ensure access to healthcare, education, and essential services.
- 3.810 Other comments suggest that there is no evidence provided to support the requirement for strategic sites to include traveller accommodation. It further states that the Gypsy and Traveller Accommodation Assessment (Dec 2024) identifies a need for 28 pitches, with a residual requirement of 19 and critics argue this need should be met through specific site allocations, not blanket requirements on strategic sites.
- 3.811 It is suggested that DM32's approach may conflict with National Policy by placing responsibility on developers rather than the planning authority.
- 3.812 Additionally, it is commented on that requiring evidence from developers to justify exclusion is seen as burdensome and potentially ineffective and that strategic sites may not be suitable or desired by travelling communities.
- 3.813 It is therefore recommended to include specific allocations in the Local Plan.
- 3.814 A further comment highlights that current wording ("avoid areas at risk of flooding") is vague. Clearer criteria, it is suggested, would be that sites should be outside 1% AEP flood zones, with safe access/escape routes.
- 3.815 Explicit reference to Neighbourhood Plan is also recommended.
- 3.816 **Key matters arising from feedback:**
- **It is suggested that DM32's approach may conflict with National Policy by placing responsibility on developers rather than the planning authority**
 - **Comments suggest that there is no evidence provided to support the requirement for strategic sites to include traveller accommodation and that strategic sites may not be suitable or desired by travelling communities.**
 - **Policy wording changes are suggested**

3.817 Policy DM33 – Loss, Replacement and Sub-Division of Existing Dwellings

- 3.818 There is general support for this policy.
- 3.819 One comment welcomes support for the sub-division of large homes to create a number of smaller, more affordable dwellings for long-term occupation and indicates that sub-division purely for short-term holiday lets should require a much greater level of scrutiny and justification.
- 3.820 Another commenter highlights that there must be priority for action on empty homes, rather than building new ones.

3.821 Vibrant, Resilient and Diverse Local Economy

- 3.822 Wootton PC supports the development of the “Green Industry” to create jobs but are concerned that the scale of impact may not meet expectations.
- 3.823 They encourage West Oxfordshire District Council (WODC) to explore history and heritage-based tourism and the hospitality sector growth.
- 3.824 Initiatives that they propose include establishing a Cotswold Hub of Excellence for education, training, and apprenticeships and disciplines like hospitality, artisan skills (e.g., dry stone walling, gilding) and heritage building maintenance.
- 3.825 They also have concerns about the care industry with labour shortages in social care and health services, with challenges including low wages and poor public transport. Wootton PC urges action to address these issues.

3.826 DM34 - Provision and Protection of Land for Employment

- 3.827 There is support for this policy but there are several suggested changes.
- 3.828 One comment asks for clarification on what marketing evidence is needed for loss of employment land, a clear definition of employment use classes (e.g. B2, B8, Class E), recognition that permitted development rights allow changes without planning permission and proportionality: not all proposals should require 12 months of marketing evidence.
- 3.829 The last of these clarification supports the comment which suggests that the policy should align with the NPPF, which supports brownfield redevelopment without requiring marketing evidence.
- 3.830 There is a request for a change to the policy wording, suggesting that there needs to be consistency between sections on new employment development and the expansion/intensification of existing site and that it should be clarified that both apply across all settlement tiers.
- 3.831 Reference is made to Windfall Employment Sites, with concern that the current policy is too restrictive by limiting to only Tier 1–3 settlements. Suggestions to allow sites “within, adjacent or well-related” to built-up areas are made and that greenfield sites near sustainable settlements (e.g. Witney) may be also be appropriate.
- 3.832 Comments also suggest that the policy should allow for more appropriate employment uses and enhancements to existing employment provision.

3.833 Key matters arising from feedback:

- **Clarification regarding marketing evidence is required**
- **Policy wording changes are suggested**

3.834 Policy DM35 – Supporting the Rural Economy

3.835 Comments demonstrate an understanding of the challenges of the rural economy such as agricultural uncertainty, poor infrastructure, changing work patterns and a lack of affordable housing for workers.

3.836 Some comments express that the policy should explicitly support sites outside of the tiered settlements, with development assessed on site attributes, not just its countryside classification.

3.837 Other comments suggest that support be given for new/replacement buildings for employment in Tier 4 settlements there is a specific rural business need and/or development is compatible with the countryside.

3.838 A third suggestion regarding the tiers of settlements suggests applying the same criteria for previously developed land to Tier 1–3 settlements as used in Tier 4.

3.839 Comments call for a clarity in policy wording. It is suggested that the farm diversification clause needs clarification as its current wording may contradict viability aims. Additionally, comments recommend that the rural worker's dwellings clause should include 'reasonably available' to clarify expectations.

3.840 One comment criticises the Local Plan for lacking in effective rural growth policies and calls for a re-balancing between urban and rural planning.

3.841 Another comment recommends the explicit inclusion of reference to Neighbourhood Plans in this policy.

3.842 Key matters arising from feedback:

- **Expand the scope of DM35 to explicitly support employment development outside tiered settlements, not just within or adjacent to them**
- **Align criteria across settlement tiers (e.g., applying Tier 4 flexibility to Tiers 1–3).**
- **Clarify and adjust criteria for rural business needs, especially around the use of previously developed land over greenfield sites and ensuring development is contextual to site attributes, not just its countryside classification.**

3.843 Policy DM36 – Learning, Skills and Training Opportunities

- 3.844 One comment supports the emphasis on apprenticeships, volunteering opportunities and partnerships with social enterprises and suggests that this should also include early years and lifelong learning.
- 3.845 The comment further underscores the need to focus on skill development for building trades. Specifically, skills for delivering low carbon energy generation, energy-efficient homes, and quality retrofit are essential to support proposed policies CPI, DM18, and DM9, as well as local economy growth and environmental innovation.
- 3.846 Another comment highlights that the draft policy requires “Where appropriate and supported by evidence, major developments will be expected to make provision for education infrastructure on-site or through appropriate financial contributions, secured via a Section 106 legal agreement or other appropriate mechanism”. It is suggested that this needs to be clear that any contribution would need to meet the relevant tests out in Regulation 122(2) of the Community Infrastructure Levy.
- 3.847 One comment notes that Policy DM36 stipulates that ‘Major developments (defined as 10 or more dwellings or 1,000 sqm non-residential floorspace) will be encouraged to submit a Community Employment Plan (CEP) with the scope and detail of each CEP should be proportionate to the scale of development. The comment suggests that the amount of information required by this policy is enormous. Requiring such an extensive range of comprehensive studies even at outline stage on relatively small sites is likely to significantly hinder new developments coming forward, just at the time when the Government is seeking to reduce red tape in order to encourage more development to come forward.

3.848 Policy DM37 – Sustainable Tourism

- 3.849 Comments suggest general support for the policy’s aim to promote tourism and acknowledge its key drivers, bringing in over £282.5 million annually and attracting millions of visitors.
- 3.850 There is some suggestion that current focus on Tier 1–3 settlements may not align with tourism needs. It is highlighted that tourism sites often differ from ideal housing locations and there is a recommendation of clearer support for sites within settlements, previously developed land and open countryside proposals (with safeguards).
- 3.851 Some policy wording changes have been suggested. One is a recommendation to change “avoid adverse impacts” to “avoid significant adverse impacts” and the second suggests softening “must conserve and enhance” to “should, where possible, conserve and enhance”.

- 3.852 One comment suggests that Neighbourhood Plans should be explicitly referenced in this policy.
- 3.853 There is some concern regarding short-term holiday lets, suggesting that rising numbers are reducing affordable housing stock, which is affecting local businesses' ability to recruit staff. It is suggested that WODC explore measures to mitigate this issue, possibly via planning controls.
- 3.854 In regard to Camping and Permitted Development Rights, one comment suggests that new Class BC rights for temporary campsites (2023) may harm sensitive environments and recommends that WODC consider Article 4 Directions to restrict these rights in vulnerable areas.
- 3.855 It has been suggested that Witney should be recognised as a visitor destination with an inclusion of provision for coach and motorhome parking to improve accessibility.
- 3.856 **Key matters arising from feedback:**
- **There are concerns about the impact of short-term holiday lets reducing affordable housing stock**
 - **Policy wording changes are suggested**
- 3.857 **DM38 – Supporting digital infrastructure for home and co-working**
- 3.858 One comment suggests that the policy should not place the burden of utility provision on developers and that statutory undertakers (e.g. utility companies) are responsible for providing infrastructure to support development.
- 3.859 Another comment considers that the policy lacks recognition that mobile infrastructure (e.g. towers, monopoles) is essential and may need to be sited in protected areas (e.g. Cotswolds, conservation areas) and that all references to digital infrastructure should be updated to “fixed and mobile infrastructure/connectivity.”
- 3.860 A further comment notes that NPPF paragraph 119 highlights the importance of supporting the expansion of electronic communications networks and prioritising full fibre and next-gen mobile (e.g. 5G). It is suggested that local policy should reflect this by giving great weight to digital connectivity benefits.
- 3.861 Policy wording changes that are suggested regarding ‘Minimising Environmental Impacts’ are needed to show support for siting equipment in these areas whilst recognising that there is a duty upon companies to act responsibly when designing the site.
- 3.862 One comment highlights that the UK lags behind other EU countries in 5G infrastructure and suggests that planning restrictions are cited as a major barrier.
- 3.863 A concern raised by a comment is that policy requirements to minimise visual impact conflict with the need to improve connectivity in rural areas. It highlights that Mobile

infrastructure is often the only viable solution for remote communities and that refusing planning permission for towers risks leaving communities digitally excluded.

3.864 Key matters arising from feedback:

- **Policy wording changes are suggested**