

Charlbury Neighbourhood Plan 2031

Response to Consultation Representation by West Oxfordshire District Council

We acknowledge the representation made by West Oxfordshire District Council (WODC) in response to the Regulation 14 consultation on the Charlbury Neighbourhood Plan 2031 (CNP). We thank WODC for their engagement with the consultation process. We welcome the overall support for the plan and also the many constructive comments made which were all given careful consideration and have been extremely helpful in the revision of the draft plan ahead of submission to WODC for examination.

In response to specific comments:

General

The wording of the vision statement has revised to improve clarity and to recognise the declared climate emergency. This has addressed the unclear reference to biodiversity.

Paragraph numbering has been included throughout the main “policy” sections of the draft plan (sections 5 to 8).

Housing

Sections 5.1 has been restructured to provide greater clarity with the detailed analysis leading to the conclusions set out in Appendix A. We believe that sections 5.1 and 5.2 now provide a clear link between the housing objectives and the evidence behind them.

The support for the criteria based approach is welcomed and in particular confirmation that where the West Oxfordshire Local Plan 2031 (WOLP) requires new residential development should be determined on a case by case basis with no windfall allowance, that the neighbourhood plan provides further detail on what would be considered ‘development of an appropriate scale and type’ in this area.

The issues raised regarding Policy CH1 were carefully considered and this policy, together with its supporting text have been revised accordingly. Firstly, the policy now includes further clarification of the requirements for support for proposed developments within or adjoining the built-up area. Secondly, addressing stated concerns of inconsistency with WOLP policy H2 for proposed development within the built-up area, the policy now makes clear that such development would be assist in meeting the plan’s housing objectives stated at paragraph 5.2 and if it is convincingly demonstrated that the scheme would give rise to benefits to the town which would clearly outweigh any likely harms. This is believed to be in line with the “more restrictive approach to new housing development in the Burford-Charlbury sub-area” identified in paragraph 9.6.28 of the WOLP. Thirdly, the concern that the requirement for developments to generally comprise affordable housing is too restrictive and not in line with WOLP policy H3 is not considered to be appropriate as policy CH1 allows for “Lower-cost” Housing as defined in policy CH3 and the purpose of a neighbourhood plan is to ensure that the particular needs of a community are met alongside those of the district and area, a requirement that is of particular relevance to locations within an AONB. It is also clear that this requirement truly reflects the wishes of the community in Charlbury. Further clarification of Policies CH2 and CH3 has been provided through rewording of the policies and supporting text. It is not considered that these policies are overly

restrictive. However, it is recognised that the evidence base does not cover the entire plan period and therefore that there may be a need to carry out an interim review and reassessment.

The comment relating to the term “social rent” is acknowledged and wording throughout the plan has been amended to “affordable rent” to bring the Neighbourhood Plan in line with the WOLP.

Comments on “Right to Buy” are acknowledged. This has been removed from policy CH4 as it is covered in CH5 as noted. Reference to “Right to Buy” exemption in policy CH5 has also been qualified to be “subject to statutory constraints”.

Policy CH6 has been reworded to take account of comments made regarding housing mix and aims to provide greater clarity of this as well as addressing inconsistency with the Local Plan. The mix of at least 40% 1-2 bedrooms; approximately 40% 3 bedroom homes and no more than 20% 4+bedroom homes laid down is now in accordance with the local plan. The policy now seeks efficient use of space in keeping with the immediate surroundings.

Policy CH7 now refers to “affordable rented housing” and includes a reference to the local plan as the basis for housing mix.

Comments on Policy CH8 are noted.

Policy CH10 and supporting text has been amended to make it clear that the purpose of this policy is to provide for and support those with existing local connections (e.g. existing residents or elderly relatives of people already living in Charlbury). It is not intended to encourage development more suited to larger population centres. This is now in line with objective of providing a demographically balanced community.

Economy Community and Transport

The comments and general support for policies in this section are welcomed.

After consideration, no changes have been made to policy ECT1 to set out specific employment uses as this was felt to be over-restrictive and could have unintended consequences.

Policy ECT2 has been amended in line with these and other comments. Firstly, the policy requirements are qualified as “subject to permitted development rights”. Secondly, the policy now recognises other changes of use that would support the vitality and viability of the town centre (e.g. community facilities or projects). Thirdly, reference in supporting text to the ability to revert buildings back to retail use has been removed as unrealistic.

We welcome the support of policy ECT3 Home Working and recognise that this complements the WOLP’s general principle that requires all development to be supported by necessary infrastructure including that which is needed to enable access to superfast broadband.

We welcome the endorsement of Policy ECT4 as compliant with WOLP Policy E4 and have enhanced this policy as suggested by indicating ways in which modest developments may demonstrate that they meet the requirements of the policy.

Policy ECT5 has been modified in line with WOLP policy E5. We have also clarified Community Aspiration 2 to make it clear that designation of an Asset of Community Value does not guarantee protection against change of use but that it serves to demonstrate the importance of the facility to the community and provides an opportunity for a local group or organisation to acquire the asset for the benefit of the community.

Policy ECT6 has been expanded to provide additional clarification.

It is felt that the approach to parking taken in Policy ECT7 is justified considering the extreme pressure on parking in the Town but appreciate that this will need to be approved by OCC as the highway authority.

The support for policy ECT8 is particularly welcomed.

We also welcome acceptance of Community Aspiration 3 as reasonable and acknowledge the need to work this up to provide deliverable detail. As a Community Aspiration, this also features in the Infrastructure Delivery Plan (see Appendix B) and will be considered by the Town Council in due course in collaboration with OCC Highways.

Policy ECT9 has been amended as suggested to make it clear that proposals have to be compliant with LTP4 policies 19 & 34. We recognise that the Local Plan T1 and T3 require all developments to maximise opportunities for safe walking and cycling to facilities in the Town.

Considering the importance of safety at Charlbury Primary School and the dangers associated with parking it is felt that a separate Policy ECT14 to ensure safe walking access is appropriate and justified.

Comments on other traffic related policies are noted.

Natural Environment and Green Space

The support for the need to enhance the natural environment and green spaces within the town with specific reference to its importance within the Cotswolds Area of Outstanding Natural Beauty is welcomed and careful note has been taken of the comments on this section. Agreement that views from and within the Town should be protected is an endorsement of an important aim of this section. In light of these and other comments from organisations and individuals, substantial revision of this section has been undertaken.

Policy NE3 has been revised in light of these comments to require robust demonstration that consequent public benefit from any development beyond the existing building line to the west of the town must outweigh any harm to the landscape, that a similar benefit cannot be achieved elsewhere and that any detriment has been minimised and mitigated.

The support for Policies NE5 and NE6 is most welcome as these are seen to play a key role in protecting wildlife and promoting biodiversity. Substantially more detail is now included in these policies and their supporting text in response to these and other comments to further enhance this role. As suggested further information on the significance aims and objectives of Conservation Target Areas has now been added.

The suggestion of detailed maps and photographs of proposed corridors is noted. This level of detail is included in the supporting "Charlbury Parish Character Assessment" and appendices. Also, as many proposed Local Green Space (LGS) sites lie along these corridors, considerable detail and many photographs are available within the supporting "Local Green Space Assessments" document.

Further attention has been paid in the maps of the green spaces laid down in Policy NE7 to ensure that the boundaries are clear and not open to misinterpretation. Note that detailed maps for each site are included in Appendix E (was Appendix F) and at a larger scale within the supporting document "Local Green Space Assessments). We have also reviewed the criteria for designation against the NPPF for each proposed LGS site taking account of comments from WODC and others. As a result, four sites have been removed from policy NE7 and we remain confident that the criteria are met for all other sites.

The wording of Policy NE8 has been revised as recommended and also in line with other comments received. The policy has been extended to cover the need for water quality management within the Evenlode Catchment Area and to call for an integrated approach to Rural SuDS.

Policy NE9 has been revised and strengthened to provide more detail on expected environmental design standards and also to recognise the declared climate emergency by placing great weight on the need for homes to be made carbon neutral by increasing their energy efficiency.

Historic Environment and Locally Appropriate Design

Comments on policies HE1, HE2 and HE3 are noted.

Policy HE1 does in fact seek to establish a Local List of the non-designated assets as listed in Appendix D. Descriptions explaining the reasons for inclusion of assets within the local list have been added to Appendix D in a new section D.3.

Article 4 Direction

We note and accept your comments regarding an Article 4 Direction and consequently all reference to this measure has been removed from the revised plan. This includes section 8.7 and Appendix E.