

Community Infrastructure Levy Draft Charging Schedule Consultation

List of responses (Surname / Organisation name beginning A - C)

This document sets out responses submitted to the consultation on the Community Infrastructure Levy Draft Charging Schedule, which was undertaken between 10 July and 21 August 2020.

You can scroll through the responses or click on a name below to view a particular response.

Personal details including postal address, signatures and email addresses of individual respondents have been removed.

Allen, Stuart	Broadhurst, Neil
Anon	Brooks, Frederick
Aston, Cote Shifford and Chimney Parish Council	Brown, John
Avis, Jane	Brown, Patricia
Ayers, Sue	Browne, Mo
Bailey, Jill	Bryant, Roger & Elizabeth
Bailey, Tony	Burden, Margaret
Barry, Claire	Burton, D. G.
Baynton, Margaret	Bywater, Rev Stephen
Bean, Chris	Carbonero, Sharon and Evans, John
Beaumont, Yvonne	Catling, Jeremy
Bennett, Penny	CEG
Berkeley Strategic	Chamberlain, Hugh
Bicât, Jenny	Charlbury Town Council
Bicât, Tony	Chipping Norton Town Council
Bird, Charlotte	Cliffe, Janice
Bland, Jonathan	Clinch, Christine
Blenheim Estate	Coates, Francis
Blue Cedar Homes	Coleman, Sandra
Bone, Ruth and Edwin	Cookson, Katherine
Bourne Leisure Limited	Cooper, Michael
Brize Norton Parish Council	

[REDACTED]

From: Stuart Allan [REDACTED]
Sent: 17 August 2020 09:57
To: Planning Policy (WODC)
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

While I am in favour of increasing the country's housing stock, and support this local development plan, the East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

I firmly believe that the developers should make a contribution to help the local community address the resultant increase in pollution levels, increased road traffic, additional demand for access to health services, community services and recreation facilities. It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come.

Given the impact of Covid-19 on of the country's finances at both national and local level, local authorities are unlikely to be in a strong position to invest in these areas. It is therefore reasonable to expect a contribution from the developers in line with the existing requirements under CIL.

Yours sincerely

Stuart Allan

[REDACTED]

Tel: [REDACTED]

17th August 2020

Mr Chris Hargraves
Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

WODC Planning SVC

Date 24 AUG 2020

Passed to _____

Dear Mr Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 12 August 2020 10:08
To: Planning Policy (WODC)
Cc: [REDACTED]
Subject: Consultation on WODC Draft CIL Charging Schedule 2020 - Parish Council Comment

Dear Sir/Madam

CONSULTATION ON WODC DRAFT CIL CHARGING SCHEDULE 2020 – COMMENTS FROM ASTON, COTE, SHIFFORD AND CHIMNEY PARISH COUNCIL

Thank you for the opportunity to comment upon your draft CIL charging schedule 2020.

Before turning specifically to your proposals, they need to be seen in the broader context of recent announcements by the Government indicating an imminent major overhaul of the planning system, as detailed in last week's White Paper - 'Planning for the Future'. Needless to say, we as a parish council are alarmed at the clear potential in these proposals to undermine the democratic voice of the communities most affected by the developments in question. Indeed, some have termed the proposals a 'Developer's Charter', and we are minded to agree. We would be grateful for more clarity accordingly, including the WODC position and intent with regard to these proposals. Regarding the CIL, the Government's proposals include the potential scrapping of both CIL and Section 106, to be replaced by a single infrastructure levy. With the draft charging schedule suspended/withdrawn since September 2015, we wonder whether the current work will be overtaken by events?

Notwithstanding the above, we offer 3 comments on the draft charging schedule in question, none of them very supportive, I'm afraid. Firstly, you assert that a/the major principle in determining the level of CIL rates is to ensure that that 'they are set at a level that does not hinder new development', or even threaten the viability thereof. We seriously question the underlying premise of this pivotal assertion. If media reports are to be believed, 9 out of 10 planning applications are approved nationally and more than a million homes for which planning permission has been granted, are yet to be built. More locally, we see absolutely no evidence of new development being 'hindered' across the District and County – indeed, quite the opposite is the case. To exacerbate the issue, the vast majority of this rampant rate of (over?)development is occurring on greenfield sites, with commensurate environmental concerns. In our parish for example, we are facing in excess of a 20% increase in housing stock in the space of a couple of years – much of it in the teeth of local opposition and despite woefully inadequate increases in supporting infrastructure (in our case, drainage and sewerage in particular). It is a similar story in neighbouring Bampton. We have also previously questioned why the WODC Local Plan 2011-2031 requirement for 15,950 new homes exceeds, inter alia, the predicted population growth by the Office of National Statistics.

So what? This leads us to our second point – that the proposed charging schedule is simply not ambitious enough. The proposals indicate a minimum Total (Infrastructure) Funding Gap of £198million by 2031, yet claims that the £24million raised under the proposed charging schedule will make a 'significant contribution'. Simple arithmetic would seem to belie this bizarre deduction.

Thirdly, we question in the strongest terms why the 5 strategic sites in the District will be exempt from CIL altogether, thus surrendering £40 million of potential revenue to the pockets of the developers rather than addressing the already alarming infrastructure funding gap alluded to previously. The funding for supporting infrastructure would thus fall solely upon Section 106 funding. Putting aside the inadequacy of the amount of funds thus raised, then if this is to be the case then there must be more transparency and local community input into how Section 106 contributions are calculated.

Yours sincerely

████████████████████

Chairman, Aston, Cote, Shifford and Chimney Parish Council

[REDACTED]

From: Jane Avis [REDACTED]
Sent: 19 August 2020 15:09
To: Planning Policy (WODC)
Cc: Jeff Haine; robert.courts.mp@parliament.uk
Subject: CIL consultation response/ East Chipping Norton development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

There is already a need to tackle the level of pollution and traffic in the town. This development will significantly increase demand for access to health facilities here and put pressure on community services, on access to resources such as the local allotments and community run recreational facilities.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

I would strongly urge WODC to apply the CIL to this development

Yours sincerely

Jane Avis

[REDACTED]

[REDACTED]

[REDACTED]

From: SUE AYERS [REDACTED]
Sent: 06 August 2020 21:13
To: Planning Policy (WODC)
Subject: Proposal to abolish the CIL for North Witney

Planning Policy Team, CIL Consultation

After the hours that I and many others spent consulting, explaining, presenting findings and generally complying with the regulations associated with creating a Neighbourhood Plan I am appalled to hear that the WODC has seen fit to negate all the potential associated with that Plan, depriving us of any influence on the nature of the development.

It is disingenuous to pretend that house prices in this area have so decreased as to influence the WODC calculations that they can afford to dispense with all the money generated by the CIL, particularly when it was judged to be correct by the Government Inspector.

As a matter of record according to the Halifax Building Society house prices have increased.

Why I ask myself did the Council think it correct to engage yet another consultant, paid for by local ratepayers, to dismantle all the work done by the first consultant plus the paid Council employees. It sounds quite unjustifiable and having read the spawning documents on your website a very expensive exercise.

The CIL is a fair levy that subsidises the priorities of local residents who will bear the burden of an increase in population and all that is associated with that increase.

- A high volume of traffic on already inadequate roads.
- Pressure on an already overloaded sewage system.
- An equally overloaded NHS provision.
- An inadequate provision of recreation facilities
- A poor public transport system leading to more use of cars.
- No proper cycle routes from any villages surrounding Witney.

The only increase in housing badly needed locally, is Social Housing none of which is planned in the North Witney Development. Affordable Housing in NOT Social Housing.

Building huge numbers of properties for families who will move into the area where there are no large businesses to employ them, no facilities on their doorstep for local meetings or recreation and no local transport to take them to Oxford, Banbury or Swindon to work, without the use of a car.

Everything the WODC has planned will be to create an expensive enclave and any improvements will have to be underwritten by current ratepayers and not the Landowner who is due to reap some £67 million from this sale. Explain to your local OAP's living on £7000 a year why this person cannot afford to pay the CIL when he is already a fabulously wealthy man.

I strongly object to this zero rated CIL as I think it opposes any form of local democracy.

Saturday 7 Decem



Word on the street UK house prices t
back in November despite the uncerta
around Brexit and the election, accord

[REDACTED]

From: Jill Bailey [REDACTED]
Sent: 06 August 2020 17:09
To: Planning Policy (WODC)
Subject: Objection to Zero-rated CIL

West Oxfordshire District Council

We are writing to express along with Hailey Parish Council our objection to the proposed zero-rated CIL on the grounds of flawed supporting evidence (overall house prices did not fall, they increased) and the inevitable loss of community infrastructure. We also object to the exclusion of local community involvement from infrastructure spending decisions.

Yours faithfully

Herbert Alan Bailey and Mrs Jill Bailey

[REDACTED]

[REDACTED]

From: Tony Bailey [REDACTED]
Sent: 12 August 2020 22:03
To: Planning Policy (WODC)
Subject: Zero rated CIL proposal for North and East Witney

Dear Sirs,

Tonight I have come across the following post on facebook:

https://www.facebook.com/haileyvillageoxfordshire/posts/2657126104323849?_tn=K-R

This claims that there is a proposal in WODC to reduce the Community Infrastructure Levy (CIL) for proposed new developments in North and East Witney from an originally proposed £100/sqm to zero.

I've read the relevant examination details on your website (<https://www.westoxon.gov.uk/planning-and-building/community-infrastructure-levy/community-infrastructure-levy-examination/>)

Could you please take this email as my personal objection to this change. The whole point of CIL is that the developer/landowner pays towards necessary community infrastructure that is required due to big developments instead of any costs falling on the district council and hence on the council tax payer.

Kind Regards
Anthony Bailey
[REDACTED]

From: [REDACTED]
Sent: 17 August 2020 13:03
To: Planning Policy (WODC)
Cc: jeff.haine@westoxon.uk
Subject: CIL Consultation Response/East Chipping Norton Development
Attachments: Letter to Council.pdf

Dear Mr Hargraves and Mr Haine,

Attached is my response to the 40 page Vision Document recently delivered to the people of Chipping Norton.

Very interesting reading it made but left me feeling that I was reading fantasy as all my experience of what is happening here in Chipping Norton with the building sites and houses that are appearing in this document is miles away from what builders will do.

Good luck with the ideas but I fear this is a Sisyphus endeavour and will never materialise and even more unlikely if the builders are allowed to get away with not paying the CIL.

Yours sincerely,
Claire Barry

ENC.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Email: [REDACTED]

Mr Chris Hargraves,
Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney, OX28 1PB

17th August 2020

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

In your Chipping Norton Vision Statement you mention Hook Norton Low Carbon Group of which I am a member. When the Station Road development was started HNLC group approached the builder to ask to work together to make it sustainable and they said:-

- * They supported the aims in principle but felt there would be no price premium for eco houses, so they would stick to the policy of cheapest possible build.
- * I think that any builders taking on Tank Farm will come back with exactly the same reply and do nothing for Eco housing and sustainability.

We have another builder at the moment in Chipping Norton selling houses. Bloor Homes and looking at their website it is clear that this is not an eco or sustainable development and indeed their publicity is laughable giving very little information about CN saying in one part of it "with rolling open green fields to admire through your window". Knowing the development the only way to see "open green fields from your window" would be to move the window to the roof put it up on a cherry pickier as the houses are so close together, there are no green fields around that development and it is surrounded by trees and any fields are about to be built on.

I think a complaint to the ASA would be in line with this statement as it is misleading.

CIL - this is an interesting concept that to encourage development we allow a building company not to pay the Government legislated payments because it could not possible happen without this. This is akin to not paying tax but there is history of large companies not paying tax and feeling above all laws and legislation and we, this includes you, all suffer when taxes are not paid and institutions such as the NHS, the law courts, police and education all suffer from a lack of money caused by large companies feeling that they should not be made to pay their due simply because of who they are.

When I put a budget together for the projects I work on I allow for all taxes, VAT, levies and duties due and my projects run into millions of pounds but we still pay all we are legally obliged to do.

I am beginning to think I should start saying we will not do this project unless we are exempt from paying VAT (for instance).

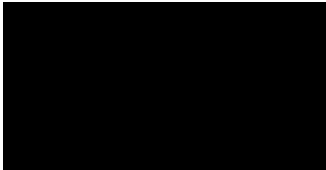
It would appear that any builders feel if they have to take less of a profit it just "isn't fair". If these companies cannot be satisfied with a very good profit then maybe they should not be in business.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come and as they pass this cost on it never comes out of their pockets so there needs to be less of the chest banging protests – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Unfortunately, I feel that this will just be another boring, cramped, car laden development mis-advertised and mis-sold to the people who do buy and they in turn will not have jobs here and probably end up commuting to Oxford but more likely London.

It would indeed be good if you could change past history but I suspect your heart is not in making a good sustainable development such as the ones you quote in the document in Cambridge, Norwich etc., I am indeed cynical about any likelihood of anything in the East Chipping Norton Vision Statement actually happening.

Yours sincerely

A solid black rectangular box used to redact the signature of Claire Barry.

Claire Barry

[REDACTED]

From: William Baynton [REDACTED]
Sent: 19 August 2020 14:37
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/East Chipping Norton Development

Dear Mr Chris Hargreaves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Increased road traffic and the resultant increased pollution levels being just two of many detrimental affects which concern me.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come, indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely,

Mrs Margaret Baynton,
[REDACTED]

Mr Chris Hargraves,
Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney,
OX28 1PB

Dear Mr Hargraves

20th August 2020

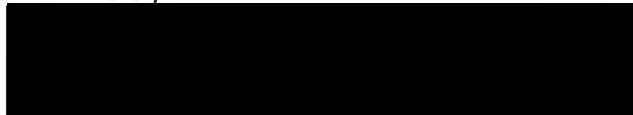
As the sole provider of Primary Healthcare to the community of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.


The health centre and our patients have repeatedly raised our concerns about the lack of a plan to address the increasing healthcare needs of the community – exacerbated by the growth in patients driven by the development. To date there has been scant acknowledgement, let alone recognition of the need. Your 'offer' to sell us land at 'residential rates' is an indication of your sole drive to make profit from the development without any regard of the medium to long term healthcare needs of the users of Primary Healthcare services. Given the latest, current, and no-doubt ongoing, crisis can you urgently re-evaluate your position – or at least make your position clear so the community and health centre staff fully understand where WODC priorities lie...

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely



Chris Bean
Practice Manager



[REDACTED]

From: [REDACTED]
Sent: 17 August 2020 18:52
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL Consultation response/E Chipping Norton development



Tel. [REDACTED]

17 August 2020

Mr Chris Hargraves
Planning Policy Team
West Oxfordshire District Council
Emfield, New Yatt Road
WITNEY OX28 1PB

Dear Mr Hargraves

CIL Consultation response/East Chipping Norton Development

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come—indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Yvonne Beaumont (Mrs)



[REDACTED]

From: Penny Bennett [REDACTED]
Sent: 16 August 2020 07:45
To: Planning Policy (WODC)
Subject: CIL North and East Witney.

To whom it may concern.

West Oxfordshire District Council are proposing to abolish the Community Infrastructure Levy on the planned estates at North and East Witney.

I object to this proposal on the grounds of flawed supporting evidence (overall house prices did not fall, they increased) and the inevitable loss of community infrastructure.

I cannot believe zero rating CIL is a good idea - Witney is short on community facilities as it is, and cramming more people into estates without the necessary leisure and recreation space, or upgrades to local infrastructure, is nothing short of insane.

Given CIL is paid by the landowner, one only has to ask who first came up with this proposal, and overturned the original estimations. Who is this going to benefit? Not the character of the town with a new bland and resource poor estate, and not the residents of these new builds. Certainly not existing people living in the town who will suffer from increased demand on existing space and infrastructure.

Yours Sincerely

Penny Bennett
[REDACTED]

Planning Policy
West Oxfordshire District Council
Elmfield Office
New Yatt Road
Witney
Oxfordshire
OX28 1PB

18th August 2020

Dear Sir

Community Infrastructure Levy, Draft Charging Schedule

Thank you for your invitation to comment on the Community Infrastructure Levy Draft Charging Schedule, which has been published for consultation until 21st August 2020.

Berkeley welcomes the opportunity to comment on this important issue, which will have a significant bearing on the delivery of the District's development and infrastructure needs in a co-ordinated and timely manner.

Berkeley control 82 acres of the West Eynsham SDA, representing approximately 40% of the overall allocation. We are currently working with the District Council, Oxfordshire County Council and other stakeholders to prepare a masterplan/Supplementary Planning Document to secure the comprehensive and co-ordinated delivery of the SDA.

Given the very significant abnormal infrastructure and s106 costs associated with the West Eynsham SDA, it is essential that this masterplan provides a clear and unambiguous framework for the equitable sharing of the site wide infrastructure costs between the parties who control this site.

As has been set out in Berkeley's previous submissions to the Council in relation to CIL, if the West Eynsham SDA was to be subject to a CIL charge, this would significantly undermine the viability of the development given the very significant abnormal infrastructure and s106 costs and 50% affordable housing requirement to which this site is subject.

Berkeley is therefore supportive of the Draft Charging Schedule setting a zero CIL charge for the local plan Strategic Site allocations, including the West Eynsham SDA. The Viability Assessment, which has been prepared on behalf of West Oxfordshire District Council to inform the Draft Charging Schedule, shows that the West Eynsham SDA is not viable. The assessment identifies a viability deficit of over £14.3M due to 'the significant site opening up costs and the site specific S106 infrastructure contribution requirements'. The Viability Assessment therefore concludes that the Strategic Sites 'will not be capable of accommodating additional CIL charges and should be treated as separate zero rated CIL zones'. Berkeley supports the zero CIL rating of the West Eynsham SDA.

Berkeley Strategic Land Limited, Berkeley House, 19 Portsmouth Road, Cobham, Surrey KT11 1JG
Tel: 01932 584 598

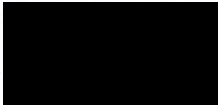
www.berkeleygroup.co.uk

Registered No. 2264097

However, it is noted that the viability appraisal prepared for the West Eynsham SDA allows for a total abnormal infrastructure and planning obligations cost of £30.6 million. This is substantially below the assessment of costs for the SDA which has been prepared by Berkeley and shared with the District Council. The inclusion of the full cost of abnormal infrastructure and planning obligations within the viability appraisal would increase the viability deficit further.

We trust that you find these comments useful and look forward to continuing to work collaboratively with the District Council in the preparation of the CIL charging schedule and the West Eynsham SPD/masterplan to ensure the comprehensive delivery of viable, high quality and sustainable development on this important site.

Yours faithfully

A solid black rectangular box used to redact the signature of Jon Lambert.

Jon Lambert
Planning Director

[REDACTED]

From: Jenny Bicât [REDACTED]
Sent: 20 August 2020 14:49
To: Planning Policy (WODC)
Subject: CIL consultation response/ East Chipping Norton Development

Dear Chris Hargraves

I have lived in Churchill for 45 years and Chipping Norton is my main town where I use all the available services. I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. The East Chipping Norton development will increase the size and population of the town considerably and will therefore put pressure on an already stretched infrastructure.

It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

The recent hiatus in traffic caused by the lockdown has shown what a terrific improvement in air quality could be made if the right infrastructure is created.

It is only right that those making substantial profits from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come—indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

When Councils give developers a free pass, as unfortunately so often happens, they are failing in their duty to the community that they claim to serve.

Yours sincerely

[REDACTED]

[REDACTED]

From: Tony Bicât [REDACTED]
Sent: 20 August 2020 09:32
To: Planning Policy (WODC)
Subject: CIL consultation response/ East Chipping Norton Development

Dear Chris Hargraves

As a resident of Churchill for whom Chipping Norton is our town. I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper. The East Chipping Norton development will increase the size and population of the town considerably and will therefore put pressure on an already stretched infrastructure.

It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

The recent hiatus in traffic caused by the lockdown has shown what a terrific improvement in air quality could be made if the right infrastructure is created.

It is only right that those making substantial profits from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come—indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

When Councils give developers a free pass, as unfortunately so often happens, they are failing in their duty to the community that they claim to serve.

Yours sincerely

Tony Bicât

From: Charlotte Bird [REDACTED]
Sent: 21 August 2020 11:12
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

The issue of traffic pollution levels is ongoing and will only deteriorate with increased traffic. The Health Centre is struggling to provide appointments that don't involve an onerous wait. Can I throw school places into the mix? All of these are extremely important issues and need addressing as a matter of extreme urgency.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Charlotte Bird
[REDACTED]



Virus-free. www.avq.com

[REDACTED]

From: Jonathan Bland [REDACTED]
Sent: 19 August 2020 14:42
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

There is already a need to tackle the level of pollution and traffic in the town. This development will significantly increase demand for access to health facilities here and put pressure on community services, on access to resources such as the local allotments and community run recreational facilities.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

I would strongly urge WODC to apply the CIL to this development

Yours sincerely

Jonathan Bland
[REDACTED]

[REDACTED]

From: Nigel McGurk [REDACTED]
Sent: 20 August 2020 13:34
To: Planning Policy (WODC)
Cc: Roger File; Matthew Neilson
Subject: CIL Draft Charging Schedule Consultation

Dear Sir or Madam

Thank you for the opportunity to comment on the proposed Community Infrastructure Levy Draft Charging Schedule (*Consultation 10 July - 21 August 2020*).

We note that the 2015 CIL charging schedule has now been formally withdrawn and that the new proposed charging schedule is that proposed via this consultation.

Whilst we are cognisant of central government's apparent proposal to move away from a locally-defined CIL schedule, as per the recent White Paper, Blenheim Estates considers a sensible, locally-set CIL charging schedule, taking local circumstances into account, to represent a positive way forward for the successful and timely delivery of sustainable development in West Oxfordshire. As such, we are pleased to see the advances made by the District Council in respect of CIL, especially during a difficult period, when available resources have been under particular pressure.

In general terms and taking into account the current planning system and current market conditions, the proposed CIL rates do appear to be set at a level that should not place an unnecessary barrier upon new development coming forward. Furthermore on this basis, the rates also appear, in general terms, to strike a careful balance between providing additional investment to support development and the potential effect on the viability of developments. We would also add that an appropriately levied CIL would have the positive potential to reduce uncertainty and negotiations around the delivery of infrastructure associated with larger development schemes in particular.

Consequently, Blenheim Estates is largely supportive of the approach to CIL as set out.

We would however, add the note of caution that, due to the economic uncertainties associated with the impact of Covid-19, we would like to see the draft charging schedule remain dynamic until it has emerged through the examination process. We don't, for example, know today what the impacts upon sustainable development might be over the ensuing 6, 12 or 24 months, let alone over the medium to long term. This necessarily has an impact in respect of knowing what a fair and appropriate charge will be in the near and more distant future.

Given this, whilst we are very supportive of the introduction of a locally-defined CIL charge and confirm that we are pleased with the positive progress made by the District Council, we would also like to take this opportunity to reserve our position in respect of the final charging schedule.

Taking all of the above into account, we would be pleased to have the opportunity to appear at examination should we consider it appropriate to do so and at this stage, we therefore request the right to be heard by the examiner. In addition, please could we also request notification (to the three email addresses above): of the submission of the Draft Charging Schedule for examination; and subsequent to the examination, notification of the publication of the recommendations of the examiner and the reasons for those recommendations; and the approval of the charging schedule by the charging authority (West Oxfordshire District Council).

Thank you in respect of all of the above and also, once again, for the opportunity to comment via this consultation process.

Kind regards

Nigel McGurk

Nigel McGurk

Head of Planning



BLenheim ESTATE

Estate Office | Blenheim Palace | Woodstock | OX20 1PP

T: [REDACTED] | M: [REDACTED] | blenheimestate.com



This email including attachments, may contain confidential information.

If you have received it in error, please notify the sender by reply and delete it immediately.

Is it necessary to print this email? If you care about the environment like we do, please refrain from printing emails.

It helps to keep the environment forested and litter-free.

For information about how Blenheim manage your information please see our Privacy Policy on www.blenheimpalace.com/privacy

Our Ref: ST/WOCIL

14 August 2020



Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

Dear Sir or Madam

Re: Representations to West Oxfordshire District Council – CIL Draft Charging Schedule, March 2020, Public Consultation

I refer to the West Oxfordshire District Council CIL Draft Charging Schedule Public Consultation and wish to make a number of representations. These Submissions are made on behalf of Blue Cedar Homes, a private retirement homes specialist operating in the South West of England. This representation follows on from previous submissions made in relation to the CIL Draft Charging Schedule, dated 8 May 2015, together with a submission on 10 November 2015 responding to the Examiner's Note and a subsequent representation on 10 March 2017.

By way of background, I thought it would be useful to recap and explain the type of retirement developments we develop. Our product is very unique and different to that offered elsewhere in the retirement marketplace. The properties are predominantly detached dwellings including bungalows and whilst we do build some flats, we do not build many schemes similar to what one might expect for a care home. We enable people to 'rightsize' into properties which can accommodate their changing lifestyle as they mature. Typically, our schemes comprise 10 to 12 retirement dwellings.

Our homes have many features which allow versatility as and when it is required or necessary. As such, I truly believe that a Blue Cedar home helps reduce the likelihood of needing to move into a residential home, due to frailty in later life. All of the properties benefit from estate maintenance – both communal and individual.

In providing this type of accommodation, our build costs are inevitably higher than the norm. However notwithstanding all of the above, we face a number of difficulties, not least that our specialist housing is considered in the same light as traditional, C3 housing. Local Planning Authorities treat our retirement schemes like they would any other residential development, without little consideration to the product, the additional features and the specialist housing stock it provides.

220 PARK AVENUE
AZTEC WEST
ALMONDSBURY
BRISTOL BS32 4SY
TEL: 01454 201166

www.bluecedarhomes.co.uk



On 26 June 2019, the Government updated its National Planning Policy Guidance (NPPG) on Housing for older and disabled people. Paragraph 001 of the guidance sets out why it is so important to plan for the housing needs of older people, noting that;

*“The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. **Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.**”*
[Emphasis added].

I note within the Proposed CIL charges set out in paragraph 3.2 on page 5, the CIL rate for residential development varies depending if a development is between 1-10 dwellings or over 11 dwellings, and in addition, if it falls within the Low, Medium or High zone. A rate of £100 per m² for extra-care housing within all of these zones is also proposed.

I strongly believe that a nil rate across the Authority should be applied to specialist accommodation such as retirement housing. It is not clear from the table on page 5 which sets out the charges whether ordinary retirement homes such as those provided by Blue Cedar Homes would be exempt from CIL. Reference to ‘**C3 Sheltered/Retirement Houses**’ should be explicitly added to the residential CIL rates in the table on page 5.

It is important to note that the Government have issued viability guidance in the section relating to Housing for older and disabled people at paragraph 015 of the NPPG (26 June 2019) stating that;

*“Viability guidance sets out how plan makers and decision takers should take account of viability, including for specialist housing for older people. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure. **Plans can set out different policy requirements for different types of development.** These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies and local and national standards, **including the cost implications of Community Infrastructure Levy and section 106.**”*
[Emphasis added].

As such, this recent guidance should be taken into account in the Council's CIL Charging Schedule.



I believe that a housing scheme which provides a real need for specialist housing, such as retirement dwellings, should be exempt from CIL or at the very least, be less than the CIL level for general open market housing. Numerous appeal decisions support this assertion. Indeed, I mentioned in my previous representation that Blue Cedar Homes were involved in a planning appeal in the Vale of White Horse District Council (Appeal reference: APP/V3120/W/15/3141368 dated 19 May 2016). At paragraphs 19 and 20 of the decision, the Inspector noted that as a result of our enhanced specifications (which include among others strengthen ceiling joists, wider staircases and treads, hidden fixings for stair lifts, oversized garages for mobility impaired) our retirement developments do have additional costs and as such it is appropriate to use the BCIS upper quartile costs. There is no sense therefore in penalising retirement housing with a high CIL rate. I enclose a copy of the appeal decision for your reference.

Furthermore, it is important to note the approach the neighbouring Authority of South Oxfordshire have taken in their CIL Charging Schedule (April 2016) – namely that 'Residential – retirement housing including extra care incorporating independent living (C3)' is subject to a nil charge. This type of housing is defined as '*all types of housing designed for older people which provides for continued independent living which is self-contained such as, but not limited to, Extra Care Housing, Enhanced Sheltered Housing in independent living within a Care Village*'. There is no reason why the same stance cannot be taken by West Oxfordshire District Council in its CIL Charging Schedule.

Finally, in the Planning White Paper which was published last week (6 August 2020) the Government is looking at a simpler national levy to replace the current system of developer contributions. This document is currently being consulted upon (until 29 October 2020) and I appreciate that in the meantime you have to progress CIL within West Oxfordshire on the basis that it will remain. However, I thought it was pertinent to mention it.

I trust the above comments can be considered in the West Oxfordshire District Council CIL Draft Charging Schedule Public Consultation. Please will you keep me notified of developments throughout the preparation process?

Yours faithfully

A solid black rectangular box redacting the signature of Simon Tofts.

Simon Tofts
Land Director

Email: A solid black rectangular box redacting the email address.

Appeal Decision

Hearing held on 13 April 2016

Site visit made on 13 April 2016

by Siobhan Watson BA(Hons) MCD MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 19 May 2016

Appeal Ref: APP/V3120/W/15/3141368

Southmoor House, Faringdon Road, Southmoor, Abingdon, OX13 5AA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr R Williams (Blue Cedar Homes) against the decision of Vale of White Horse District Council.
 - The application Ref P15/V0712/FUL, dated 25 March 2015, was refused by notice dated 16 September 2015.
 - The development proposed is the demolition of existing building (previously used as a care home) and the construction of 10 "age restricted" dwellings (including 1 bungalow) with access, car parking and other facilities.
-

Decision

1. The appeal is allowed and planning permission is granted for the demolition of existing building (previously used as a care home) and the construction of 10 "age restricted" dwellings (including 1 bungalow) with access, car parking and other facilities at Southmoor House, Faringdon Road, Southmoor, Abingdon, OX13 5AA in accordance with the terms of the application, Ref, P15/V0712/FUL dated, 25 March 2015 subject to the conditions in the attached schedule.

Main Issue

2. The main issue is whether the provision of affordable housing would be appropriate in the context of the viability of the development, the National Planning Policy Framework, development plan policy and all other material planning considerations.

Reasons

3. The appeal site is a large detached building which is currently vacant and was last used as a care home. The building stands in large grounds which contain a number of mature trees subject to a Tree Preservation Order. There is no dispute that the site is suitable for housing development. The parties also agree that there is an identified need for both affordable housing and housing for older people. Policy H17 of the Adopted Vale of White Horse District Council Local Plan 2011 (the LP) indicates that 40% of dwellings should be affordable. The Council does not have a 5 year housing land supply (HLS), and it was agreed at the hearing that its current HLS is 4.2 years.
 4. The Council's Supplementary Planning Guidance *Affordable Housing* advises that if a developer considers that the criteria in Policy H17 cannot be fulfilled,
-

evidence will need to demonstrate why the level of provision sought by the Council would make the development unviable. It also says that in some cases it may be accepted that the provision of other housing objectives may reduce the amount of affordable housing that can be reasonably provided.

5. Paragraph 173 of the National Planning Policy Framework advises that to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. The Planning Practice Guidance (PPG) says that decisions must be underpinned by an understanding of viability, ensuring realistic decisions are made to support development.
6. The PPG does not provide a single approach for assessing viability but points in the direction of sector led guidance on viability methodologies and says that **one of the principles for understanding viability is "evidence based judgement"** which is informed by relevant available facts. It requires a realistic understanding of the costs and the value of the development in the local area and an understanding of the operation of the market. It says that for older **people's housing, the specific scheme format** may be a factor in assessing viability.
7. In assessing the viability of the appeal scheme, the principal areas of disagreement between the 2 main parties are the benchmark site value and development costs.

Benchmark Site Value

8. The Council and the appellant fundamentally disagree over the market value of the land. The Council has arrived at a land value of £1m whereas the appellant is of the view that it is worth £1.35m. Central to this disagreement is whether or not the site is valued for a realistic alternative use that complies with planning policy as required by the PPG¹.
9. The appellant has worked out a site value based on evidence of land transactions on other housing sites in the area. This is in accordance with the advice in the PPG which indicates that in assessing a return to the developer comparable schemes or data sources should be reflected wherever possible. Whilst I acknowledge that the site does not have a specific housing allocation, the Council accept that the use of the site for housing would be policy compliant.
10. The Council accepted at the hearing that the **appellant's** comparable schemes were policy compliant although pointed out that 2 of them did not have to provide affordable housing and therefore were not directly comparable to the appeal site. That said, the Council did accept that the other 4 sites were relevant comparators in terms of complying with Policy H17 as they had each provided 40% affordable housing. Therefore, in using these 4 sites as comparators, the calculation of land value by the appellant has taken into account the need to provide affordable housing.
11. **However, the Council disputed the appellant's methodology of working out a value based on the size of the developable area of the site because it was of**

¹ Paragraph: 024 Reference ID: 10-024-20140306

the view that it should be worked out on a plot value basis. According to the Council, therefore, based on the plot values of the comparators, the value of the site would be lower than if worked out on a per acre value. The Council has never formally assessed if more houses could be built on the site and therefore, in its view, **the appellant is attaching a "hope value" to the land** in assuming that there was more than one scheme which the Council would allow.

12. I acknowledge that there has not been permission for a higher density scheme on the site but at the hearing the Council accepted that up to 15 units would be acceptable depending upon the exact details of the scheme. The Council did not provide any real evidence to substantiate the claim that 15 houses might not be acceptable, and therefore, based on the size of the plot and its context amongst estate housing, I disagree that the valuation of the land should be limited to 10 plots.
13. Furthermore, as the comparators were higher density developments with smaller dwellings than the appeal scheme, their plot values would be clearly lower than those of the larger appeal plots. Therefore, I consider that the **appellant's methodology in using price per acre is more realistic than using price per plot.**
14. The site has a developable area of 1.65 acres. The 4 comparators which provided 40% affordable housing achieved between £803,000 and £1.43m per net developable acre. If their values are applied to the net developable area of the appeal site, the land value would be between some £1.3m and £2.2m. In the absence of any conflicting comparable evidence from the Council, the **appellant's view that the market value of the site would be £1.5m**, with planning permission in place, does not seem unreasonable.
15. Another area of dispute is the amount of deduction from the £1.5m for planning risk. The appellants have deducted 10% from that figure to arrive at their benchmark site value of £1.35m. The Council say that a 20% risk would be more appropriate citing that this was the figure accepted by the Inspector in the Shinfield Appeal². However, I do not know the full circumstances of that case and the two proposals are vastly different: the Shinfield appeal was for up to 128 dwellings on a much larger site with very different characteristics in terms of policy and use; in a different geographical area and had other planning considerations in addition to affordable housing. Therefore, the Shinfield case is not directly comparable to the appeal scheme. Given the acceptance by the Council that housing development on the site would be policy compliant, I consider that the planning risk is minimal and therefore a 10% risk is appropriate in this particular case.
16. I therefore **consider the appellant's benchmark site value to be more convincing than the Council's which is significantly below** the values of any of the comparator sites.

Development Costs

17. Many of the development costs are agreed as set out in the Statement of Common Ground. There is, however, major disagreement about core build costs (foundations up). **The Council's position is that the core build costs would be £1,739,270 and the appellant's position is that the core build costs would be**

² APP/X0360/A12/2179141

£2,099,350. The Council is of the view that the appellants should have submitted a detailed elemental cost plan of the construction. However, the PPG says that build costs should be based on appropriate data, for example, that of the Building Cost Information Service (BCIS) and therefore I am satisfied that the appellant has taken the correct approach in basing its costings on BCIS data.

18. Another area of dispute is whether or not the appellant has used the appropriate level of BCIS data. The appellant has used the upper quartile figures whereas the Council are of the opinion that the sales price can be **achieved by using the mean average "estate housing" figures.**
19. The Council says that the core build cost should be based on the BCIS mean average estate housing figures and query whether the Blue Cedar Homes (BCH) dwellings would actually cost more to build than general estate housing. However, the BCH marketing brochure explains that the housing would have features such as disabled access paths through each scheme, level thresholds, disabled access throughout the ground floor of each property, wider staircases, hidden fixings for easy installation of a stair lift, strengthened ceiling joists for the installation of a hoist above a bedroom and bathroom, larger shower enclosures and low level shower trays and stronger bathroom and shower room walls to allow for later adaptations. It seems to me therefore, that there are additional costs in providing these enhanced specifications.
20. The BCH dwellings would have a sales price significantly greater than the mid range estate housing. I heard that the BCH scheme would cost some £19 per SqFt more to build than the estate houses which would give an enhanced value over the estate housing of some £64 per SqFt. Therefore, as the BCH dwellings are projected to sell for substantially more per SqFt than the estate housing, I consider it appropriate to use the BCIS upper quartile costs.
21. It is not disputed that in addition to the core build costs, there would be an **additional amount for "abnormal costs" and "external costs"**. There is broad agreement on the abnormal costs. However, the Council admitted at the hearing that it has not accounted for external costs, (such as estate roads, drives, patios, sewers, and the turfing of gardens) which, according to the appellant, would be in the region of £400,000 for the whole of the development.

Summary of Benchmark Site Value and Development Costs

22. The parties are £350,000 apart in terms of benchmark site value and £360,080 in terms of core build costs. **The appellant's calculations leave a negative** residual land value which means that there is no room for providing affordable housing in any form. These matters are not a precise science and involve an element of judgement. **Notwithstanding the fact that I find the appellant's** evidence convincing; even if I had accepted the Council's benchmark site value and core build costs, a big hole has been left by the Council not accounting for external works. Therefore, the external works would, in any event, wipe out the surplus indicated in **the Council's** evidence.

Other Matters

23. At the hearing the Council suggested that the appellant should have explored different forms of housing development on the site to see if it could find an alternative viable scheme. However, this approach is not supported by national planning policy and I am mindful of the advice in the PPG which says that where the viability of a development is in question, local planning authorities should look to be flexible in applying policy requirements.
24. **I note the Council's reference to an appeal decision in Islington³.** However, I explain above why I consider that the **appellant's** land value reflects policy requirements. Therefore, I consider that the **Government Legal Department's response to the Council's legal challenge to** the reasoning in that decision is consistent with my reasoning in this appeal. Furthermore, Islington Council was not granted leave to appeal.
25. I note third party comments in respect of access and parking. However, I have no material evidence that the parking arrangements or access would harm **highway safety and I note that the Council's highway engineer raised no** objections to the proposal. I consider that the distances between proposed and existing properties are satisfactory and there would be no unacceptable impact upon the living conditions of nearby occupiers. I also note neighbours' comments in respect of the loss of the existing building but I have no reason to believe that it is of any special historic or architectural interest and therefore, there is no compelling reason to retain it.

Conclusion

26. For the above reasons, I am satisfied that the scheme would not be viable if affordable housing were provided in any form. The failure to provide affordable housing would be in conflict with LP Policy H17. However, I need to take into account other material considerations: The proposal would accord with the **Council's SPG; the Framework, and the PPG;** and would provide significant benefits in terms of adding to the supply and mix of housing in the area.
27. I therefore conclude that the provision of affordable housing would not be appropriate in the context of the viability of the development, the National Planning Policy Framework, and all other material planning considerations. Therefore, taking into account all material considerations I allow the appeal subject to conditions.

Conditions

28. I have considered the conditions set out in the Statement of Common Ground in accordance with the Planning Practice Guidance. In addition to the standard implementation condition it is necessary, in the interests of precision, to define the plans with which the scheme should accord. Conditions concerning external materials, the bin store, landscaping and tree protection are required in the interests of the character and appearance of the area. A condition is required for the satisfactory drainage of the site; conditions are required in respect of visibility splays, site access, the surfacing of parking spaces/drives/road in the interest of highway safety; conditions in respect of birds and bats are necessary in the interest of biodiversity. A condition limiting

³ APP/V5570/A/14/2227656

the age of the occupiers of the dwellings is necessary in the interest of the provision of accommodation for older people in the area. Conditions 4, 3, 7, and 10 are pre-commencement conditions as these matters cannot be satisfactorily dealt with at any other time.

Siobhan Watson

INSPECTOR

Schedule

- 1) The development hereby permitted shall begin not later than three years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the approved plans listed in the schedule contained within the signed Statement of Common Ground.
- 4) No development shall take place until samples of the materials to be used in the construction of the external surfaces of the building hereby permitted have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.
- 3) Prior to the commencement of the development, a fully detailed sustainable foul and surface water drainage scheme for the development, including a management and maintenance plan, shall be submitted to, and approved in writing by the local planning authority. The approved scheme shall be implemented in accordance with the approved details before the occupation of any dwelling and shall be maintained thereafter.
- 4) The development shall be carried out in accordance with the Tree Quality Survey, Arboricultural Impact Assessment & Arboricultural Method Statement by Tyler Grange dated 20 March 2015. All the trees shown as being retained shall be protected by strong fencing as shown in this statement. The fencing shall be erected in accordance with the approved details before any equipment, machinery or materials are brought onto the site for the purposes of the development, and shall be retained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed within any fenced area, and the ground levels within those areas shall not be altered.
- 5) No dwelling shall be occupied until the vehicular access is widened and visibility splays at the site access are provided in accordance with the details set out in the Transport Statement, March 2015. The widened access and visibility splays shall be retained thereafter and remain free of structures or vegetation above 0.9m high.
- 6) No dwelling shall be occupied until the approved car parking spaces, drives and access road have been surfaced. The parking spaces shall be constructed to prevent surface water discharging onto the highway. The parking spaces, drives and access road shall be retained thereafter.
- 7) Before any dwelling is occupied, a scheme for the provision of bat and bird boxes shall be submitted to and approved by the local planning authority. The approved scheme shall be implemented before the occupation of any dwelling and shall be retained thereafter.

8) Any tree or hedge removal connected with the implementation of this planning permission shall be carried out outside of the bird nesting season (March to August inclusive).

9) The bin store shown on the approved plans shall be provided before the occupation of any dwelling and shall be retained thereafter.

10) All hard and soft landscaping shall be carried out in accordance with approved plan 677-01B. The works shall be carried out in accordance with a programme to be agreed in writing with the local planning authority. The written programme shall be submitted to the local planning authority before the commencement of development. Any trees or shrubs which die or become seriously damaged or diseased within 5 years of planting shall be replaced by trees and shrubs of a similar size and species to those originally planted.

11) The dwellings hereby permitted shall be occupied only by:

i) persons aged 60 or over;

ii) persons living as part of a single household with such a person or persons;

iii) persons who were living as part of a single household with such a person or persons who have since died.

APPEARANCES

FOR THE APPELLANT:

Sarah Reid	Counsel
Andrew Cullen	Alder King LLP
Anthony Allen	Allen Planning Ltd
Mr Simon Toft	Blue Cedar Homes
Richard Williams	Blue Cedar Homes
David Millar	Blue Cedar Homes

FOR THE LOCAL PLANNING AUTHORITY:

Andrew Jones	BPS Chartered Surveyors
Elise Parish	BPS Chartered Surveyors
Helen Novelle	Vale of White Horse District Council
Jacqui Evans	Vale of White Horse District Council
Sarah Green	Vale of White Horse District Council

Brett Leahy

Vale of White Horse District Council

INTERESTED PERSON:

Peter Evans

Local Resident

DOCUMENTS SUBMITTED AT THE HEARING:

Appeal Decision Ref: APP/V5570/A/14/2227656

Letter to the London Borough of Islington from Government Legal Department,
dated 23 October 2015

[REDACTED]

From: [REDACTED]
Sent: 20 August 2020 22:00
To: Planning Policy (WODC)
Cc: [REDACTED]
Subject: Objection to Zero-rated CIL for North and East Witney

Dear Planning Policy team

We are writing to object to the WODC proposal to Zero-rate the Community Infrastructure Levy (CIL) in relation to the North and East Witney development schemes.

In summary, we support Hailey Parish Council's objection to the proposal to zero rate CIL on the grounds of:

- 1. Flawed supporting evidence (assumption of falling house prices when they actually increased); and**
- 2. Inevitable loss of community infrastructure in the parish of Hailey and in the area generally.**

We also support their objection to the exclusion of local community involvement from infrastructure spending decisions. Our reasons are set out in more detail below.

Having followed closely the consultation, examination and approval processes that led to the 2016 West Oxfordshire Local Plan, especially the arguments and outline designs for the North Witney development (which is in the Parish of Hailey), we are totally baffled and outraged by this proposal. Not only will Hailey Village miss out on infrastructure funding for local improvements to help us integrate the North Witney development with the existing settlements in our parish, but WODC appears to be giving up on much needed social and leisure infrastructure funding, despite there being no provisions in the Local Plan for it – this looks like shooting themselves and Council Tax payers in West Oxfordshire in both feet! **The proposal (and its evidential basis) smacks of incompetence and/or undue weight being given to the interests of landowners and developers who will profit from the scheme to the detriment of the current and future residents of Witney.**

The residents of Hailey voted by a huge majority to accept a Neighbourhood Plan which incorporated carefully thought out provisions for welcoming and integrating the additional population of Hailey when North Witney is finished; these included imaginative and prudent use of our anticipated portion of the CIL to achieve this successfully. The prospect of a huge housing estate in our parish with little or no community infrastructure (e.g. community, sports and health centres, parks and green spaces, safe cycle routes, new footpaths etc etc) is deeply depressing and not what is envisaged or promised in the Local Plan, which took so many years to pass through the planning system.

During the public consultation and the Local Plan Inquiry, we know that viability of the North and East Witney schemes was a hot topic, subject to adjustments following public consultation. The North Witney scheme proposals were declared to be viable by WODC's consultants assuming a CIL of £100 per m². The Planning Inspector who approved the Local Plan accepted the viability of both schemes on the basis of the WODC consultants' viability assessment (which was tested rigorously during the Inquiry and challenged robustly by objectors to the schemes).

We understand that, in 2019, WODC employed a different consultant who has declared that the CIL is not affordable after all, and advises that, even after stripping CIL out, both schemes are 'marginally non-viable'. This was a total shock and surprise and the Parish Council in Hailey has investigated how this new advice could possibly have come about; how could WODC and the Planning Inspector have got the viability assessment so wrong in 2016? The results of the Hailey investigation are really clear – the latest calculation has assumed a reduction in Gross Development Value (of all housing) that is 13% (£77M) lower than that calculated in 2016, whilst actual house prices overall **increased** by 2.5% in the period 2016 to 2019. At the same time, we understand that the North Witney landowners are projected to receive 9% (5.5M) more than in the 2016 models. The changes in the valuation assumptions (and the apparent acceptance of the new calculations by WODC) smack of incompetence, corruption or both.

Please acknowledge safe receipt of this objection.

Yours faithfully

Ruth and Edwin Bone



Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

Via email: planning.policy@westoxon.gov.uk

Date: 21 August 2020
Our ref: 04051/78/NT/MLa/18702473v5

Dear Sir/Madam

West Oxfordshire District Council – Community Infrastructure Levy Draft Charging Schedule

On behalf of our client, Bourne Leisure Limited (“Bourne Leisure”), we submit this representation to the **Council’s** Community Infrastructure Levy (CIL) Draft Charging Schedule consultation.

By way of background, Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within West Oxfordshire District, Bourne Leisure operates Heythrop Park Resort.

The focus of our representation is on how the Council proposes to apply CIL to hotel and other holiday accommodation uses.

Commentary on Draft CIL Charging Schedule

The West Oxfordshire District Council CIL Viability Assessment (January 2020), prepared by NCS, provides the evidence to demonstrate that of the commercial uses, only food supermarket retail development has a viability margin capable of accommodating CIL charges (Para. 6.9). The assessment recommends that all other non-residential categories are zero rated and should not pay CIL. This recommendation forms the basis of the consultation.

We endorse the conclusion of the CIL Viability Assessment that clearly shows there is no basis for a CIL charge on hotels.

However, we consider that the zero rate should also apply to other forms of holiday accommodation such as lodges, static caravans and purpose-self catering accommodation within holiday resorts that are not a main place of residence. This is because there is a clear distinction between accommodation within holiday resorts and residential dwellings. Holiday resort accommodation is also not comparable to other types of seasonal holiday lets that could also be used as dwellings.

Holiday resort accommodation is restricted to holiday use and can only be occupied while holiday parks and resorts are open. The units are used for short term lets of typically three, four or seven days at a time, by any family or group. As commercial premises, they are subject to payments of business rates, rather than council

tax. Accordingly, they **would not fall under the definition of a “dwelling” contained** in the Local Government Finance Act 1992, cross-referenced by the CIL Regulations (2010, as amended).

We therefore request that residential uses are defined in the CIL Charging Schedule and it is made explicit that caravans and other purpose built self-catering units within holiday resorts fall outside the definition and **are therefore ‘zero rated’ in CIL terms as a non-residential use.**

We trust that this representation is helpful and will assist the Council in finalising the CIL Charging Schedule and applying it once adopted. Please do not hesitate to contact my colleague Maddie Lane or me should you require any clarification of the points made. We would be grateful if you would keep us informed of progress on the development of the CIL Charging Schedule and other emerging policy documents in West Oxfordshire.

Yours faithfully



Ian York
Associate Director

Copy Ian Gyte, Bourne Leisure
 Stuart Billington, Bourne Leisure



A Doomsday Village

BRIZE NORTON PARISH COUNCIL

20th August 2020

Planning Policy Team,
Elmfield,
New Yatt Road,
Woodgreen
Witney.
Oxon
OX28 1PD

CONSULTATION ON COMMUNITY INFRASTRUCTURE LEVY (CIL) DRAFT CHARGING SCHEDULE

Dear Sirs,

Brize Norton Parish Council has reviewed the draft Charging Schedule for CIL and Councillors have the following comments:

The purpose of the CIL payments is to provide funding for the infrastructure necessary to support the residential development that it is funding.

The proposed charging structure is to charge the lowest CIL in the areas of lowest property value and the highest in the area of highest property value.

This seems wrong, as it will promote development where house values are lowest.

House prices are typically lowest where there is a lack of employment opportunities and where the local infrastructure is poorly developed for new housing.

Brize Norton Parish Council therefore argue that CIL charges should be highest in low value areas, rather than the lowest as this will:

- a) provide funding that is required for local infrastructure development needed for future expansion in post codes OX18 1... and OX18 3..
- b) provide an incentive for developers to concentrate development in high value areas where low cost housing is required to meet local needs.
- c) provide an incentive for developers to concentrate new development in areas where local infrastructure requires less investment to support new development.

Brize Norton Parish Council would be grateful if West Oxfordshire District Council could reconsider their CIL charging strategy such that it will promote sustainable development close to employment areas, rather than forcing more development in the lowest value areas, with poorest supporting infrastructure and lower employment opportunities exist.

In addition, Brize Norton Parish Council respectfully remind West Oxfordshire District Council, that a significant area of RAF Brize Norton (42%) lies within the Brize Norton Parish Boundary. This land area occupies 16% of the Parish of Brize Norton. Any CIL charges forthcoming from developments on the air base that lie within the Parish of Brize Norton should be assigned to Brize Norton Parish Council.



Yours sincerely



Mrs Alison Riseley
On behalf of Brize Norton Parish Council

[REDACTED]

From: Neil Broadhurst [REDACTED]
Sent: 15 August 2020 15:33
To: Planning Policy (WODC)
Subject: Community Infrastructure Levy for Chipping Norton

Dear Mr Chris Hargraves,

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Over the past 3 years there has been development on the A361 Burford Road, the redevelopment of the Penhurst estate to retirement homes. More retirement provisions on both sides of the London road. Finally a housing development on the Banbury road. With these various developments which will attract people from both ends of the housing spectrum, where is the necessary support infrastructure to deal with the growing population of Chipping Norton. Also, how are these developments going to best support local people, young and old and more importantly those at the poorest end of the wealth spectrum?

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Neil Broadhurst
[REDACTED]
[REDACTED]
[REDACTED]

Phone: [REDACTED]

24 August 2020

Mr Chris Hargraves,
Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney, OX28 1PB

Dear Mr Hargraves,

Community Infrastructure Levy (CIL) urgently needed

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already infrastructure. It is essential that improvements in infrastructure and community facilities are made to accommodate such growth in the town.

Surely it is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this major development was originally proposed (imposed?).

I appreciate that I have missed a deadline (21 August) quoted in the Town Council's glossy on this development, but so important is the CIL money to this hard-pressed town that there really should be no deadline. Please ensure that this and any other such letters that are "late" are properly taken into account and that you have any developers pay their appropriate dues.

Yours sincerely,

[REDACTED]

F C Brooks (Mr)
(Frederick Charles Brooks)

[REDACTED]

From: pat brown [REDACTED]
Sent: 21 August 2020 10:25
To: Planning Policy (WODC)
Subject: CIL

Dear Planning Policy Team

ZERO RATED COMMUNITY INFRASTRUCTURE LEVY

Hailey Parish Council have informed local residents of WODC's consultation on their proposal to abolish the CIL from N and W Witney. This levy has always been used, we are informed, to help deliver infrastructure 'such as community, sports or health centres, parks and green spaces etc.'

I am writing to express my very strong objection to this proposal to zero-rate CIL. I cannot understand this proposal in view of the fact that WODC has apparently 'identified a huge infrastructure funding gap across West Oxfordshire of nearly £200m'.

The development of large areas of housing without essential supporting facilities leads to badly overstretched local services and barren, unrelieved expanses of housing.

It is also essential that local councils are able to prioritise CIL spending money in their area.

On addition, the basis of WODC's calculations on housing values would seem to be questionable as Hailey Parish Council has independently identified an overall increase in values.

I would ask that this very strong objection be noted.

Yours faithfully,

John Brown

Oliver Murray

From: pat brown [REDACTED]
Sent: 21 August 2020 10:31
To: Planning Policy (WODC)
Subject: CIL Consultation

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

ZERO RATED COMMUNITY INFRASTRUCTURE LEVY

Dear Planning Policy Team

Hailey Parish Council have informed local residents of WODC's consultation on their proposal to abolish the CIL from N and W Witney. This levy has always been used, we are informed, to help deliver infrastructure 'such as community, sports or health centres, parks and green spaces etc.'

I am writing to express my very strong objection to this proposal to zero-rate CIL. I cannot understand this proposal in view of the fact that WODC has apparently 'identified a huge infrastructure funding gap across West Oxfordshire of nearly £200m'.

The development of large areas of housing without essential supporting facilities leads to badly overstretched local services and barren, unrelieved expanses of housing.

It is also essential that local councils are able to prioritise CIL spending money in their area. In addition, the basis of WODC's calculations on housing values would seem to be questionable as Hailey Parish Council has independently identified an overall increase in values.

I would ask that this very strong objection be noted.

Yours faithfully,

Patricia Brown

tel. [REDACTED]; mobile [REDACTED]
email: [REDACTED]

Chris Hargraves
Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX2S 1PB

19 August 2020

Dear Chris Hargreaves

CIL consultation response/East Chipping Norton Development

I am a resident of Chipping Norton and, as such, very concerned that you have proposed to waive the Community Infrastructure Levy (CIL).

The East Chipping Norton development will have a huge impact on the town and could overwhelm an infrastructure that is already under great pressure. It is very important that the CIL remain so that the town can improve and sustain its support systems, accessibility and community facilities.

Without CIL it is unlikely that traffic and pollution levels, already a problem in our town, can be curbed or that ecological sustainability can be achieved; community services will need investment, as will the maintenance of open spaces for recreation and sport. Equally important, the town's health service and surrounding area needs urgent funding to cope with an enlarged population.

If care is not taken, Chipping Norton's community will not achieve the quality of life promised at the time of the development's proposal. I feel strongly that this promise won't be achieved unless adequate funding is available. I hope that consideration of quality of life, in its many facets, will be a top priority, to ensure that Chipping Norton will remain a place in which people of varied walks of life want to be able to live and work.

Those who make huge profits from developments don't often have to live in the projects they impose on communities but nevertheless should be required to ensure that those who **do** have the sort of life they would wish for themselves.

Yours sincerely
Mo Browne
(MM Browne)

[REDACTED]

From: [REDACTED]
Sent: 08 August 2020 17:13
To: Planning Policy (WODC)
Subject: CIL Examination

Dear Sir

We wish to object to the WODC proposal to abolish the Community Structure Levy for North and East Witney Housing development based on incorrect flawed supporting evidence. The current rate of house price inflation is, according to several sources, between 1.7 and 2 per cent increase in West Oxfordshire. Talk to estate agents and they will tell you that at the moment house prices are rising.

If the development at North and East Witney takes place it will require significant new local infrastructure such as school, health and highway improvements etc. and the proposed change in the CIL will transfer the burden of funding the infrastructure, from the land owners, who will be made rich by the development, to the Community Charge payer. Surely such a move cannot in all conscience be defended.

We would therefore object very strongly to this proposed move.

Yours

Roger & Elizabeth Bryant

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

From: Margaret Burden [REDACTED]
Sent: 18 August 2020 08:56
To: Planning Policy (WODC)
Subject: CIL funding for East Chipping Norton Development

Good morning,

I was most concerned to learn that WODC do not intend to raise a Community Investment Levy from the developers of the above site on the grounds that this would make the development financially unviable for the developer.

This very much feels like a renegeing on the plans proposed to the town some time ago which included a CIL, and it was against the proposed development with the CIL that the town in general agreed to accept this disproportionately large development. At that time we were promised an improvement, enhancement, extension and strengthening of the town's facilities and infrastructure through this Levy to help cope with the increased demand put on our facilities and services. This feels a real let down, not to mention deceitful. I am really disappointed and would ask you to reconsider your decision.

Yours sincerely,

Margaret Burden

[REDACTED]

From: D BURTON [REDACTED]
Sent: 11 August 2020 10:18
To: Planning Policy (WODC)
Subject: Objection to zero-rated CIL for the proposed North and East Witney developments

Dear Sir,

I strongly object to zero rated CIL for the proposed North and East Witney developments on the grounds of flawed supporting evidence (overall house prices did not fall, they increased) and the inevitable loss of community infrastructure. I also object to to the exclusion of local community involvement from infrastructure spending decisions

Yours faithfully,

D.G. Burton, [REDACTED]



21 08 2020

Dear Mr Chris Hargraves.

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

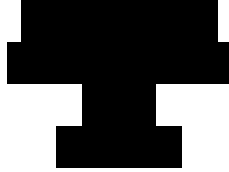
For example, the sewerage system is already at full stretch, as is the health centre and the schools.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those of us living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely.

Rev Stephen Bywater.





17 April 2020

Mr Chris Hargraves
Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

Dear Mr Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come - indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Sharon Carbonero and John Evans

[REDACTED]

From: Jeremy Catling [REDACTED]
Sent: 21 August 2020 17:49
To: Planning Policy (WODC)
Subject: re: CIL non requirement Chipping Norton query

Dear Sirs,

After reading about this payment which seems to be a pretty standard thing and accepted, I wonder what the mathematical basis is for the thought of the payment making the whole thing a non viable entity and furthermore I wonder if there is a mathematical basis and if it has been scrutinised? I mean this is a 1200 property site and if one developer feels it is unviable then is this the same for all contractors or just the one presumably being awarded the contract?

So are the local council supposed to weather the storm and continue with the same backing that they continue with now and if not the local council, would not WODC be able to liaise with the Town Council to begin and continue work to what is likely to be regarded as Old Chippy Town to cater for the increased burden of New Town atop the the hill?

I'm a businessman in the town but I'm not writing in relation to that business which is hardly likely to be affected but more for the people who might want to visit the town and comment on a couple of just many things... first with the minimal parking available. The Town Plan a few years ago reduced the car parking in the town and the The Fox Hotel took back its parking in Cattle Market that locals used which was no doubt teased out to help this. The long term car parks didn't change and after a while The Coop were able to reduce the originally agreed quantity of parking to aid the town. All these things are detrimental for an ever increasing population of Chipping Norton. There is a thought for a low 2nd story of the car park in New Street to aid the ability for more parking, likely to increase by more local housing and required by ever increasing visitors to the town. Where could maybe the money come from or be helped from to do this?

That's quite an obvious thing that stands out but there's smaller issues like the general maintenance of the paths in the town centre and beyond which again would fall under the jurisdiction of WODC but all they appear to be able to do is patch and repair with indeed, patches of tarmac. How many more people are going to have to be helped until the ambulance arrives, or patched up locally until something is done about the paths and indeed what about the drain offs of all the listed buildings in the high street having water come to an abrupt stop where the contractor for WODC failed in this work and covered all up with slabs that lift under deluges of rain?

There is so many things that need paying for, that could be paid for or could simply be done with this money helping the town centre to remain viable and safe for all or to all.

I don't believe about anything not being viable and it should be more that their bluff is called but I'm sure there's a plan. There's always a plan. There's a plan for now and a plan for the future and whatever the little man has to say there will be a plan to ignore what the little man says and the little man and his broken lip and blood spattered pavements will be collateral damage to a bigger picture where cutting into profits is not part of a plan.

Regards,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

Thames Valley
5th Floor,
Thames Tower,
Station Road,
Reading, RG1 1LX,

nexusplanning.co.uk

21 August 2020

Dear Sir / Madam

West Oxfordshire – CIL Draft Charging Schedule Consultation

On behalf of our client, CEG, we write to make formal representations to the Community Infrastructure Levy (CIL) Draft Charging Schedule (“**the DCS**”) that is published for consultation.

CEG’s has land interests in West Oxfordshire, specifically adjacent to Hanborough Station, which it is promoting through the emerging Oxfordshire Plan as well as continuing to do so at District level.

For major residential development in the ‘high value zone’ areas of the District, the DCS proposes a CIL rate of £150 per sq m, which for any scheme poses a significant financial cost.

Despite this, the DCS is unclear as to precisely what CIL will be used to fund and how it will operate alongside contributions that may still be sought under s.106 obligations.

It is recognised that since the Government amended the CIL Regulations to remove Regulation 123, which previously prevented s.106 contributions being sought towards infrastructure that is to be funded by CIL (a practice of ‘double dipping’) and limited the pooling of s.106 contributions, there is greater scope for the two systems to operate together.

However, planning obligations are still subject to the legal restrictions of CIL Regulation 122, which require any obligation to be ‘necessary to make the development acceptable in planning terms’; ‘directly related to the development’; and ‘fairly and reasonably related in scale and kind to the development’. It is therefore important that this greater scope for the two systems to work together does not then bring sought obligations into conflict with Regulation 122.

To avoid a situation where a planning obligation may be unlawful in being ‘unnecessary’ as it is simply duplicating CIL, it is essential that the Council is clear and precise as to what CIL would be spent on. This is especially important given the DCS states that CIL would help fund local transport, education, greenspace and community infrastructure – all items for which the Council has previously sought contributions through planning obligations.

CIL by its nature is a predetermined tax based on floorspace, but one that does not take account of site-specific circumstances or site-specific viability. With reference to the Council's 'CIL Viability Assessment' (January 2020), the DCS proposes a nil CIL rate on the five strategic sites allocated in its adopted Local Plan, as each is shown to have marginal negative viability with a likely level of s.106 obligations. The Council should therefore expect other major sites of similar sizes, whether or not a strategic allocation, to have similar viability challenges that would only be compounded should CIL be introduced as an additional charge.

This blunt and unresponsive nature of CIL is recognised by Government in its White Paper: Planning for the Future currently out for consultation. The Government proposes here to scrap both planning obligations and CIL in favour of a new Infrastructure Levy. This Levy would be a value-based charge, capturing an uplift in land value achieved through the grant of planning permission, above a specific threshold. Unlike the current CIL, such an approach would be sensitive and responsive to economic downturns, and through the abolishment of planning obligations any duplication would be avoided.

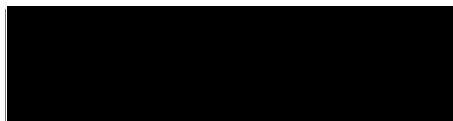
Given that legislation for the Infrastructure Levy will be making its way through Parliament next year, there is opportunity for the Council to wait and instead work with that new and hopefully improved system.

Overall

CEG is supportive of the Council in seeking to provide the necessary levels of infrastructure required across the District. However, it would be concerned if CIL was to (i) duplicate what can already be provided for under planning obligations, potentially bringing planning obligations into conflict with CIL R122 and/or (ii) prejudice the viability of major development sites, especially given the Council's evidence in respect of its current strategic allocations.

I trust that you will take these representations into account, and would be grateful if you could keep me informed as to the progression of the emerging CIL.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Andrew Somerville
Associate Director

cc. CEG

[REDACTED]

From: Hugh Chamberlain [REDACTED]
Sent: 17 August 2020 12:38
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: FAO Mr Chris Hargraves Re: CIL

Dear Mr Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Hugh Chamberlain
[REDACTED]



Charlbury Town Council

Town Clerk: Roger Clarke, [REDACTED]

21 August 2020

Consultation on draft charging schedule for Community Infrastructure Levy

Thank you for the opportunity to respond to this consultation.

Charlbury Town Council does not support the proposal to exempt the five strategic sites from Community Infrastructure Levy. We believe that the sites will place demands on West Oxfordshire's infrastructure that cannot be adequately funded unless CIL is charged.

Importance of CIL contributions to Charlbury

Charlbury serves an important role as the rail hub for much of West Oxfordshire, and continues to be the busiest station on the Cotswold Line. Town facilities such as the Charlbury Community Centre are regularly used by residents of other towns, including Chipping Norton and Witney, and have plans to expand.

The strategic sites will place significant extra demands on Charlbury's infrastructure. In particular, we expect heavy use by East Chipping Norton residents of Charlbury railway station, given that fares and total travel time are lower than at Kingham. The station car park was frequently full (pre-Covid19) resulting in overspill onto residential streets, but GWR has been unable to fund a further expansion appropriate for the AONB setting. Increased station traffic may also require traffic measures on the B4026 from East Chipping Norton to Charlbury.

CIL's district-wide scope is more suitable for funding wider infrastructure requirements like this. We do not have any confidence that such projects would be funded by S106 and there is no consistent track record of this happening.

CIL viability assessment

We have serious concerns about the evidence used in the CIL viability assessment. The £0 output is chiefly a product of three inputs: site opening up costs, S106 infrastructure allowances, and property sales values. All three are problematic.

The site opening up costs appear to be estimates with no clear evidence base. For example, in the Garden Village, a round £20m is allocated for "A40 crossings". We find this very hard to justify given that Worcestershire County Council is funding three crossings of the dual carriageway Worcester Southern Bypass (Crookbarrow Way, Broomhall Way, Upper Battenhall Farm) for £7m. The West End Link Road, though clearly a complex project, also appears high at £23.2m for 500m compared to the Hoobrook Link Road across the Stour valley in Kidderminster (£16m for 1.2km). We also question whether the link road for East Chipping Norton (£8m) has been overspecified, or is even necessary in that form, now that the Burford weight limit has removed the A361's role as an HGV through route.

No justification has been given for the £15,000 S106 figure. Given that several local authorities have chosen to fund infrastructure chiefly through CIL rather than S106, we would expect a clear explanation for WODC's policy choice. In practice, the preference for S106 means that more spending decisions will be made at county level and fewer at local level – which is hard to justify when parishes have been encouraged to draw up Neighbourhood Plans.

Finally, we believe that the forecast property sales values may be underestimated. They are significantly lower than those in the CIL schedule proposed in 2016, and the discrepancy is not backed up by market trends. The surveyors are an East Midlands firm with no apparent West Oxfordshire base, and we believe engaging those with knowledge of the local market could result in a more accurate forecast.

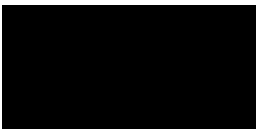
Conclusion

We cannot support the proposal for a £0 CIL on strategic sites. We request that WODC revisits both the evidence in the viability assessment, and the policy decision to favour S106 over CIL, to arrive at a solution able to properly fund consequential infrastructure needs in Charlbury and across the district.

We further endorse the statement we have signed with several town and parish councils, including Witney, Chipping Norton, Eynsham and Hanborough, opposing the CIL exemption for strategic sites.

We have no comment to make on the other aspects of the charging schedule.

Yours faithfully



Richard Fairhurst
chair, Charlbury Town Council

Planning Policy Team
West Oxfordshire District Council
Elmfield
New Yatt Road
Witney
OX28 1PB

By email to: planning.policy@westoxon.gov.uk
From: The Mayor, Chipping Norton Town Council

21 August 2020

Dear Sirs,

Consultation on CIL Charging Schedule

Chipping Norton Town Council have been considering the **Draft CIL Charging Schedule** and strongly object to the proposed *Zero-Rating* of the **East Chipping Norton Strategic Development Area (SDA)** in that Schedule.

The reasons for the Town Council's views on this are set out in this letter.

Chipping Norton's infrastructure needs

Although a development of this size was unpopular with the vast majority of local residents, the town was assured that the *East Chipping Norton SDA* would provide a once in a generation opportunity to provide major infrastructure benefits for the town and local community. The promised delivery mechanism for these benefits was CIL. (I refer you to page 209 of the adopted 2031 Local Plan on Infrastructure required for Chipping Norton relating to the Strategic Development Area and I quote: *The IDP seeks to quantify the infrastructure improvements that will be needed to support the planned level and distribution of growth set out in the Local Plan. This will form the basis upon which future decisions regarding the provision of new or improved infrastructure will be made along with the Council's CIL regulation 123 list once introduced*).

Moreover, with a neighbourhood plan in place 25% of CIL proceeds could be spent by the Town Council on projects close to the local community.

Chipping Norton faces substantial infrastructure issues. Amongst other issues:

- The town is choked by HGVs passing through the centre of town, leading to unlawful levels of air pollution as well as creating an unpleasant environment for shopping and socialising. The Town Council has long advocated the desirability of an HGV weight limit on the A44 in the centre of town as well as other traffic calming measures and projects to reduce air pollution.
- Businesses and residents suffer from a lack of adequate off-street parking which could strangle the vitality of the town.
- There is a lack of local employment opportunities.

These are not, of course, the only issues that need attention in Chipping Norton but all of these issues will be strongly exacerbated as the town grows by about a third with the addition of **1,200** new homes and their attendant cars and families on the *East Chipping Norton SDA*.

This large development needs to be properly integrated with the rest of the town and, to achieve that integration, funds will be needed to improve the town's infrastructure and community facilities.

The role that CIL could play in meeting those needs

In the lead up to the decision regarding the **1,200** homes for Chipping Norton, the Town Council were told that CIL receipts from the *East Chipping Norton SDA* could be used to fund a wide range of infrastructure including transport, schools, green space and community and cultural facilities and, because an adopted Neighbourhood Plan is in place, WODC would have to pass **25%** of CIL receipts in Chipping Norton to the Town Council.

As set out in paragraph 6.5 on page 8 of the CIL Draft Charging Schedule (March 2020), the Town Council could then use the CIL receipts passed to it to support "*the development of the (Town) Council's area by funding the provision, improvement, replacement, operation or maintenance of infrastructure; or anything else that is concerned with addressing the demands that development places on the area*". In other words, the Town Council would have funds to help address some of the infrastructure issues set out above and set its own agenda.

This means that for the first time a great many spending decisions could be taken at the level of democratic decision making closest to the local community. The Town Council could decide what would best support town growth and could, for example, itself apply funds towards issues such as traffic calming, parking improvements and limiting HGV traffic through town, not to mention children's play equipment, new public seating areas and open space maintenance – all projects ideal for CIL Receipts. The Town Council would not have to be making the financial case to WODC or OCC for such projects.

With *zero rated* CIL for the *East Chipping Norton SDA* none of this will happen. Instead we would need to rely on *developer's Section 106 contributions* for infrastructure funding.

The drawbacks of relying on Section 106 contributions

The *Draft CIL Charging Schedule* is supported by *CIL Strategic Site Viability Appraisals* and a *CIL Viability Assessment Report*. The Viability Assessment Report for the *East Chipping Norton SDA* estimates that **£15,405,000** (*i.e. 15.4 million GBP*) of *Section 106 contributions* would need to be provided by developers in respect of the *East Chipping Norton SDA* over and above the provision already factored in for a new primary school and a new Link Road.

It needs to be recognised; however, that planning legislation dictates that *Section 106 contributions* must meet the following three tests.

- Section 106 contributions must be *necessary to make the development acceptable in planning terms*; and
- Section 106 contributions *must directly relate to the development*; and
- Section 106 contributions *must fairly and reasonably relate in scale and kind to the development*.

So, in the case of the *East Chipping Norton SDA*, these tests would cover things like the proposed new primary school together with other *on-site* infrastructure required for the development to function. However, it is more difficult on the basis of these tests to get developers to fund projects that *benefit the wider town and district*.

To get such "*wider*" funding, we would be relying upon the negotiating skills and the questionable bargaining position of the District and County officers who would need *before anything else* to argue how such "*wider*" community benefits could be directly connected to the development. CIL payments, on the other hand, would automatically go into a general pot that could be spent on any item of 'infrastructure'.

Moreover, the negotiation of Section 106 contributions rarely seems to us to be the open and transparent process that we would want to see. Far too often we are presented as a Town Council with an agreement that has already been agreed and negotiated with little or no input from us.

To recap, on these criteria Section 106 is likely to be *restricted to "on site" infrastructure requirements* while CIL receipts would be more expansive in scope so as to benefit *the wider Town (and District)*.

We therefore contend that *Zero-rating CIL* fails to meet the requirements of Chipping Norton as well as departing from the promises made that the *East Chipping Norton SDA* would bring infrastructure benefits to Chipping Norton through CIL.

If the necessary infrastructure funding does not come from CIL, it is difficult to see where it will come from. The stakes are high. If we get this wrong, we are compromising the whole future of this town as a vital and vibrant centre for the northern part of the District. We risk squandering the only opportunity likely to present itself in this generation for making fundamental improvements to the town's infrastructure.

Our recommendation – reinstate the original proposed CIL rate of £100 per m² on the East Chipping Norton SDA

It does not have to be like this. The initial proposed CIL charging rate for the Strategic Development Areas was set at £100 per m² and we have set out above the benefits to be gained from a CIL charging rate at this level. We would propose that such a CIL charging rate should still be what is aimed for.

WODC's consultants argue that if you charge CIL on the strategic sites, then those sites will not be viable for developers to build out and deliver. Their evidence for this is contained in the Viability Appraisals and Report referred to above that WODC have commissioned from their consultants. We disagree.

The Government's Practice Guidance is that a return of **15-20%** of the *Gross Development Value* of a development is a suitable profit return for a developer in order to establish viability. For East Chipping Norton, the *Gross Development Value* calculated in *the CIL Strategic Site Viability Appraisal* is £247,758,665 and the development profit to make the scheme viable is calculated at £38,849,131 (i.e. about 16% on our calculation). This guidance will have governed the approach taken by WODC's Consultants.

We would suggest that a close look is taken at a number of elements in the Viability Appraisals, where we think unsupported assumptions abound.

- ***The eastern Link Road:*** We consider that the estimated cost of £8 million for building the eastern Link Road may be an exaggerated figure. We also continue to seriously question the necessity of the Link Road as an essential element in the first place since the development could be quite easily served by a spine road which would be a cheaper and more usual option. We would like you to scrutinise this again in order to make a convincing case.
- ***The land costs:*** We are concerned that the estimated land costs are higher than they should be. In the viability calculations these *appear* to be based on *generic land value calculations* rather than *actual costs*. Moreover, the County Council (OCC) is the owner of much of the land and so one flexible element of the viability calculation is what it chooses to charge the developers for that land. While generally obliged to obtain best price, there is scope for OCC to invoke the General Disposal Consent (England) 2003 (or to request the specific consent of the Secretary of State) to dispose of land at less than the best price if such a disposal is likely to contribute locally to the promotion or improvement of economic and/or social and/or environmental well-being. There is no evidence that this possibility has been factored into the viability calculations.
- ***House prices.*** It appears that the viability assessment factors in a drop in house prices which we believe to be inaccurate. From the report submitted by Hailey Parish Council to WODC the

calculations from the Land Registry show that house prices have risen across West Oxfordshire by 9.3% and by 6.3% in Chipping Norton.

- **Projected costs of “other” section 106 contributions calculated at £15.4 million.** There is no indication in the viability assessments as to what the “Other” essential infrastructure spending might include. Moreover, looking at the calculations for the other strategic sites it is clear that this figure in the viability calculations is just a mathematical figure reached by multiplying the number of dwellings by a seemingly random figure of £15,000. It does not therefore appear to be linked to any actual identified spending needs. If this figure for essential *on-site* infrastructure contributions could be reduced it provides adequate scope for a CIL contribution.

If the original proposed CIL charging rate for the Strategic Development Areas was set at £100 per m² we have calculated that total CIL receipts on the *East Chipping Norton SDA* would be just in excess of **£5 million** (of which just under £1.3 million would be passed to the Town Council). Our calculation is set out in the Schedule at the end of this letter.

For a CIL charge to be viable at the original proposed rate of £100 per m² we are therefore looking at developers being able to fund **£5 million** on a scheme with a gross development value projected at close to **£250 million**. This is just 2% of the gross development value. We have indicated in the above bullet-pointed sections some areas where development costs may not be as high as suggested (*the link road, land costs and projected on site infrastructure costs*) and where revenue might be greater (*house prices*).

We also note that the February 2017 Report by the Department for Communities and Local Government reviewed the operation of CIL and concluded that on average a typical residential CIL charge approximated to 2% to 3% of the house price and that the impact on development viability of charging CIL was often negligible, certainly in a rising housing market.

This is a prime housing development location with the principle of development already established and we do not accept that a CIL charge £100 per m² as originally proposed would tip the development into unviability.

It follows that the presumption that charging a CIL rate would in itself make the *East Chipping Norton SDA* unviable remains a flawed and untested argument.

Summary

There are two important issues here.

1. It is above all essential that the *East Chipping Norton SDA* provides sufficient funding for the necessary infrastructure investment that the town needs in order to mitigate the impact of such a large development. It is a CIL charge that is most appropriate to fund such projects that *benefit the wider town and district*; and
2. The local community should be able to determine priorities. Again, it is a CIL charge that best enables responsive local decision making with an element of spending being routed through the Town Council.

We therefore need WODC to rethink their proposals and set a CIL charging rate on the *East Chipping Norton SDA* at or close to the original proposed CIL charging rate for the Strategic Development Areas of £100 per m².

A zero-rated CIL charge would be unacceptable to this Council in terms of the potentially unmitigated impact of an extra 1,200 homes on Chipping Norton and the breach of frequent promises in respect of the benefits that the *East Chipping Norton SDA* was supposed to bring to the Town.

Yours faithfully,

Mayor
Chipping Norton Town Council

Schedule
Possible CIL receipts on the East Chipping Norton SDA

For these purposes we have applied the originally proposed rate of **£100 per m²** to the remaining 1,000 dwellings that remain to be built on the East Chipping Norton Strategic Development Area and made the following assumptions:

1. that 400 of the dwellings will not be chargeable to CIL because they will be *affordable housing*;
2. that a further 50 homes will be exempt from CIL because they are self-build dwellings;
3. that the remaining 600 homes will be built roughly in the proportions set out in the Local Plan for mix of properties, namely 5% 1 bed, 28% 2 bed, 43% 3 bed and 24% 4 bed.

Dwelling size	No. of dwellings	CIL payable per property	Total CIL payable per class of dwelling	Share of CIL due to Town Council per property (25%)	Share of Total CIL due to Town Council per class of dwelling (25%)
Apartment: 50sqm	26	£5,000	£130,000	£1,250.00	£32,500
2 Bed House: 75 sqm	153	£7,500	£1,147,500	£1,875.00	£286,875
3 Bed House:90 sqm	238	£9,000	£2,142,000	£2,250.00	£535,500
4 Bed House: 130 sqm	131	£13,000	£1,703,000	£3,250.00	£425,750
Total			£5,122,500		£1,280,625

Accordingly, if charged at the originally proposed rate of **£100 per m²** developers would have to pay on this calculation just over **£5 million** in CIL charges, of which just under **£1.3 million** would come to Chipping Norton Town Council.

**West Oxfordshire District Council
East Chipping Norton Strategic Development
Area Supplementary Planning Document – Issues
Paper**

**Response to consultation on behalf of Chipping
Norton Health Centre**

**By
David Lock Associates**

6th March 2019



Introduction

West Oxfordshire District Council (WODC) is in the process of preparing a Supplementary Planning Document (SPD) in the form of a Development Framework setting out the key principles and parameters for the development of the East Chipping Norton Strategic Development Area (SDA). Once adopted, this will be a material consideration in the determination of any planning application submitted for the site.

The first stage of this process is the publication by WODC of an “Issues Paper”, which is subject to consultation until 5pm on the 8th March 2019. The Issues Paper includes a series of questions that need to be responded to specifically, and WODC has further confirmed that it will welcome any more general comments which respondents wish to make.

This document contains the response of David Lock Associates on behalf of Chipping Norton Health Centre (CNHC) to the matters raised in the Issues Paper and sets out the position of the Health Centre in relation to the additional demand on its services that will be generated by the development of the SDA.

Background

The Health Centre opened in April 2015 when the town’s previous two GP practices merged to form the current practice. It lies immediately north-east of Chipping Norton War Memorial Community Hospital Out-Patient and Maternity Unit. The practice currently has eight partners along with five/six salaried GPs, with an on-site 100-hour community pharmacy; it is also a training and teaching practice for trainee GPs and medical students. The practice serves the town of Chipping Norton and surrounding villages, currently serving some 15,637 patients.

The three-storey health centre building, which is owned by the practice, has 33 consulting rooms, some of which are used by allied health services (citizens’ advice, counselling services and community specialist services), which includes four treatment rooms and a minor operations room. It also provides local enhanced services to seven care and nursing homes and the adjacent Community Hospital, including those supporting people with dementia, and to three schools, including one for children with social, emotional or behavioural difficulties.



The CNHC is designed to be a “health hub” which accommodates not only a critical mass of GP’s but also a range of therapies provided both privately and under contract to the NHS. These collectively offer a concentrated service aimed at taking pressure away from already stressed hospitals and A&E

departments. The range of services provided includes Citizens Advice, mental healthcare counselling, musculoskeletal advice, podiatry, opticians and cardiology among others. These services enable the surrounding population to access support that would otherwise have to be provided by hospitals. They therefore reduce waiting times and offer a more sustainable and community based approach to healthcare, in line with government direction of travel and NHS service delivery plans.

During the autumn of 2018, an endoscopy unit was accommodated in the car park for a period of some 5 weeks to provide the required cancer prevention screening programme that forms part of healthcare policy. This saw over 140 patients from existing hospital waiting lists, thus reducing waiting times and improving the service for Oxfordshire residents. Whilst this was an inconvenience to users of CNHC because of the impact on parking, there were no complaints as it was recognised that this is a necessary service that cannot be accommodated within the building.

There is a growing list of other therapists who also see the benefit of the community health provision offered by CNHC, and who wish to take space at the centre. These include NHS dentists, who are currently oversubscribed in Chipping Norton, Physiotherapists, and self-help organisations that offer preventative services. None of these can currently be accommodated as there is no space within the existing centre for additional healthcare providers.

The 10 year NHS plan and GP contract promotes Primary Care Networks, where health provision is joined up across an area. The CNHC forms part of the North Oxfordshire cluster. It represents the **only** site in the network which has the potential for physical expansion, and therefore the capability to provide a wider range of service in accordance with the NHS hub principles. All other surgeries in the cluster are landlocked and constrained. To address demand they are having to subdivide rooms to meet basic local needs, which is impacting negatively on the quality of local healthcare provision. CNHC is very keen to increase the services on offer to the local community, but the incremental increase in space required is not considered to be a fully fundable investment at residential land values.

Based on the issues paper setting out the principles for the SPD for East Chipping Norton SDA, it is not clear what the Council's aspirations are for facilitating the right level and quality of healthcare for the future of the north Oxfordshire NHS area. If there is no plan in place to enable expansion at Chipping Norton, then we would like to understand what is proposed to meet the healthcare need, and how this will be delivered.

History of representations

Representations were previously made on behalf of the Chipping Norton Health Centre in relation to the West Oxfordshire Local Plan Examination in July 2017 supporting the need for the additional housing but setting out in detail the need for this to be balanced with enabling appropriate additional healthcare provision to be developed adjacent to the Health Centre to meet the growing local need, including from the new homes to be built at the SDA.

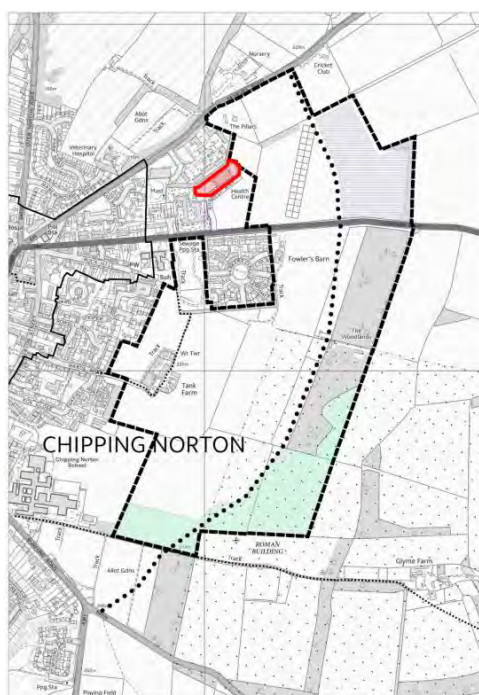
The adopted Local Plan recognised this need, but fell short of making any provision, thus putting at risk the ability for this need to be suitably met at the Health Centre. This presents a significant risk to future healthcare provision for the new SDA and other residential development in the area.

The Chipping Norton Health Centre is now the only Doctors' Surgery in Chipping Norton, and provides services to the surrounding settlements of Charlbury, Enstone, Chadlington, Kingham, Wiggington, Hook Norton, Oddington, Kitebrook, Chastleton, Adlestrop, Little Compton, Long Compton, Whichford and Ascott.

Scope of Representations

Whilst a modern state of the art facility, the existing Health Centre now accommodates some 15,637 patients, and **will not provide** sufficient capacity to support planned growth arising from the 1200 homes planned at the proposed SDA to the east of the town, let alone other developments across its catchment area.

The Site of the CNHC (edged red) is surrounded by the SDA (broken black boundary), as shown on Plan 1 below:



The only land adjacent that is not either fully developed or within the SDA has been purchased for development and is planned to provide another local care home. It is not available for health centre expansion, and in any event is separated from the CNHC site by Russell Way.

The ability for the CNHC to accommodate growing demand is therefore dependant upon its ability to expand, which unless specific provision is made, will be directly and physically constrained by the development of the SDA.

These representations therefore seek to ensure that adequate and specific provision is made within the development of the SDA, via the principles to be set out in the SPD so as to enable the expansion of the CNHC to meet the identified growth from this and other developments in the Chipping Norton catchment area. **We are of the firm opinion that this is a key priority to be addressed through the SPD.**

This Statement seeks to reaffirm our clients' position in relation to these issues, to assist WODC in ensuring that delivery of the infrastructure required to deliver future health needs is adequately addressed in the SPD.

This Statement should be read in conjunction with the representations made by the NHS Oxfordshire Clinical Commissioning Group (OCCG) which are included at Appendix 1. This clearly states that additional capacity will be required in Chipping Norton, and that it expects future primary medical care needs for the area to be provided from a single healthcare campus at Chipping Norton, building on the good facilities already in place. It recognises the leading role that the CNHC has in providing integrated services of scale to the community.

It should also be considered in conjunction with the list of signatures at Appendix 2, extending to over 190, and rising daily. These signatures do not constitute a petition but represent the views of those who independently support the need for clarity in the planning process as to the provision of health care in Chipping Norton to meet extra patient demand. Each signatory therefore represents an objection/representation to the published documentation, which fails to provide this clarity, and should be treated as such. For GDPR reasons we have redacted the document to remove personal data. The original sheets are available for inspection at CNHC if required.

Issues Paper and Questions

Section 1 - Introduction

No reference is made to the need for healthcare provision in this section, which is an important omission that should be rectified.

Section 2 – Background Context

No reference is made to the need for healthcare provision in this section. References are made to infrastructure including education and transport, but despite the case made at the Local Plan stage, the need to cater for healthcare needs is not mentioned.

In terms of background context to the healthcare need, since the representations to the Local Plan Examination, the number of patients being cared for by the CNHC has risen from 15,136 to 15,637 representing growth of over 3% in patient numbers alone since July 2017. This does not reflect the disproportionate demand on healthcare services from a rapidly ageing population which is looked at in more detail later.

Nationally, in the 12 months to July 2018 a staggering 263 doctors surgeries closed¹ representing a 285% increase in the number of closures in 2016. The BMA has warned that by 2022, as many as 1 in 10 GP practices could close. Locally, the Deer Park Medical Centre in Witney closed at the end of March 2017. In the North Oxfordshire locality alone (in which CNHC is located) there were 11.3 full time equivalent GP vacancies as at January 2018²

The model for providing primary healthcare nationally continues to rapidly evolve into a far more multidisciplinary community-based service delivery model, as confirmed above. This is based on the development of hubs offering access to multiple specialisms, like those offered at CNHC.

With an average household size of 2.4 people in West Oxfordshire (2011 Census) an additional 1,807 (over and above those already delivered in to 2017) homes in the Sub-Area will generate around 4,337 additional residents requiring healthcare services over the next 14 years, which is a 28.25% increase

¹ NHS Digital

² OCCG North Oxfordshire locality based plan

on the existing patient list of the Centre. The proposed 1200 homes on the SDA alone will generate an additional 2,880 residents, representing an increase in demand of almost 19%.

Unless specific provision is made for the growth of the CNHC to meet this demand in the SPD for the SDA there is a significant risk that the land-locked Centre will become physically constrained with no capacity or capability of expanding to meet these needs.

Oxfordshire CCG has previously indicated to the Council (in the Infrastructure Delivery Plan, 2016) that the Health Centre is unable to accommodate such growth and is likely to require expansion of the premises, and its associated parking provision. This cannot be achieved if additional land adjacent to the current site is not made available and/or reserved for such a purpose.

Without making a specific policy allowance for this in the SPD, we believe that the SDA will not meet the stated Local Plan policy to provide “a new sustainable and integrated community that forms a positive addition to Chipping Norton”, as set out at paragraph 2.7 of section 2.

We are particularly disappointed to observe that the reference in paragraph 2.8 of the document regarding the requirements for supporting infrastructure mentions transport, landscaping, biodiversity, green infrastructure, heritage, drainage and sustainability, but despite its national and local priority, makes no reference to healthcare.

At paragraph 2.20 the document goes on to highlight the identification of 5 hectares of the SDA to meet local employment needs, which will themselves generate additional healthcare demand. It does not however identify any land safeguarded for healthcare delivery.

Paragraph 2.24 identifies other potential benefits of the proposed development including the provision of supporting infrastructure such as formal and informal greenspace, allotments, enhancements to the Glyme and Dorn Conservation Target Area, new pedestrian and cycle links, local convenience shopping, and community and leisure facilities but makes no reference to healthcare facilities. This appears to demonstrate either that this is an omission, or that it is considered by WODC to be a very low priority. This can surely not be the case and should be remedied in the final document.

This is reinforced by the contents of Table 1 on pages 8-11 which sets out the Vision, Objectives and Implications for the East Chipping Norton SDA. Again, there is not a single mention of either health or healthcare provision.

Section 3 – The East Chipping Norton Strategic Development Area (SDA)

The first mention of the CNHC in the document is at paragraph 3.9 on page 14, where it is simply described as an adjacent use.

Section 4 – Site Constraints

Paragraph 4.8 on page 18 refers to the proposed development on the former Parker Knoll Factory site, for which planning permission has already been granted. This highlights that the approved scheme for this part of the SDA will include both assisted living (extra care) and retirement living accommodation. Such uses exacerbate the additional healthcare demand generated by the overall SDA, due to the increase in surgery visits and special care needs associated with an ageing population.

During the last year, the average number of interventions required for patients using the surgery who are over the age of 85 was 17³, that is more than one per month.

Section 4 of the document includes specific sub sections dedicated to Transport and Air Quality, Landscape, Cotswold AONB, Biodiversity, Heritage, Public Rights of Way, Geology, Hydrology and Soil Conditions, Infrastructure Capacity, Open Space and Employment Land.

The section on Infrastructure Capacity makes the first meaningful reference to healthcare in the document: P 27 para 4.58 states that *“Development of the scale proposed has the potential to create a significant impact on local services and facilities such as schools, healthcare and community facilities.”*

Paragraph 4.61 on page 28 identifies healthcare as a “key consideration”, which is welcomed.

Paragraph 4.62 on the same page goes on to recognise that the proposed development will create additional pressure on the Health Centre.

However, rather than reinforcing the need for this to be properly addressed by the development this and the next paragraph (4.63) concentrate on undermining the ability to address this need locally. These paragraphs highlight that the Local Plan Inspector concluded that there was not the evidence to indicate that the only feasible way of providing the facilities was by way of setting aside land for expansion. This section seems to be more concerned with safeguarding land for the landowners for value generating development rather than addressing the clear, convincing and immediately adjacent healthcare need.

To do this will require physical extension of the Centre, which cannot be achieved without additional land, as the site is currently developed to capacity.

The only alternative option could be to develop upwards or to lose existing car parking, however, this would not enable the Centre to continue to function safely or effectively during any build period and would therefore have too great a negative impact and social cost on both existing and future patients. If feasible its delivery would represent an unacceptable risk to patients whose needs could not be accommodated during the period of the works. In addition, it has been confirmed that the existing building was only specified to accommodate the height and weight of structure currently in place, and does not have adequate foundations to support an additional floor. Such an option is not therefore realistically feasible or financially viable. As demand grows, so the demand for car parking will increase.

In terms of other nearby land, all land surrounding the CNHC other than the SDA is already identified for specific development, including the provision of an additional care facility for the elderly, which whilst well located on the other side of Russell Way, will only add to the demands on the CNHC. **Other than the SDA, there is no expansion land available.**

To further reinforce this point, the West Oxfordshire Clinical Commissioning Group has confirmed in their representations (see Appendix 1) that, in accordance with the NHS long term plan published in January 2019, **this is the only location in which healthcare facilities can realistically be expanded for Chipping Norton and the surrounding area.**

³ Statistics in usage by over 85's from CNHC

Furthermore, Department of Health policy for GP practices to work together at scale across geographical areas means that the CNHC is expected to develop its Hub practice further⁴, through which more services will be transferred from the hospitals to the local community. This will serve a rural cluster of some 41,000 patients, incorporating even greater demand from the surrounding villages.

Whilst paragraph 4.62 states that the Local Plan Inspector concluded that it was not necessary for the soundness of the plan to designate a specific piece of land to provide for healthcare, it does confirm the need for the issue of healthcare provision to be taken into account as part of any masterplan for the site. This is not unusual and normal practice when the such details can be examined and incorporated into a Supplementary Planning Document related to the Local Plan.

We are firmly of the view that adequate capacity can only be provided through the SPD if this reflects the need for expansion, and now recognises that this cannot be delivered other than adjacent to the existing CNHC. The safeguarding of appropriate land will therefore be required, or the delivery of appropriate healthcare will be frustrated.

Table 2, Summary of constraints, then identifies Infrastructure Capacity as an issue on page 33:

Infrastructure Capacity	
<p>Primary school capacity constrained with existing schools unable to absorb sufficient pupil numbers. Secondary school capacity understood to be adequate.</p> <p>Additional pressure on existing healthcare provision arising as a result of increased patient numbers.</p> <p>Car parking capacity in the Town Centre known to be constrained particularly at peak times.</p>	<ul style="list-style-type: none"> - To ensure the provision of an appropriately sized new primary school at a suitable location within the SDA phased in accordance with likely delivery timescales for the new housing. - To ensure that further consideration is given to the issue of primary healthcare provision in accordance with Local Plan policy. - To explore the potential for development to contribute towards increasing the capacity of Town Centre parking.

The first specific consultation question then relates to Site Constraints, as follows:

Q1a Have we adequately described the key site constraints relevant to the East Chipping Norton SDA?

Our response to this in respect of healthcare is no. The “Site Constraints” do not identify the impact of the SDA on healthcare provision either in isolation, or cumulatively with other proposed developments across Chipping Norton and the wider catchment for the CNHC. The need to be able to accommodate future capacity is not identified as a site constraint, and more words are used trying to prevent the capacity from being provided in the only suitable location than in trying to ensure that the future health needs are adequately met, which is misleading and unacceptable.

Q1b Are there any important issues that we have not mentioned that you think should be taken into account through the SPD?

⁴ In accordance with NHS England/DoH Strategy

Yes. We would like the safeguarding land to enable growth to meet local healthcare needs identified in the SPD and taken into account throughout the SPD. There is only one opportunity to get this right for Chipping Norton, and to provide a balanced development that is sustainable in terms of healthcare to the same extent as it is for biodiversity and all the other priorities on which greater emphasis has been placed in the document. Once the land is developed, if there is no expansion space for the Health Centre, then ultimately the service will be over stretched and unable to meet local needs. The implications of this affect not only the SDA, but all residents of Chipping Norton, and beyond to the wider catchment for the Health Centre. **It would be irresponsible, unreasonable and unsustainable for this to be given inadequate priority through the planning process.**

Section 5 – Key Issues and Priorities for East Chipping Norton SDA

In paragraph 5.1 the document welcomes views on a wide range of issues, but whilst specifically identifying transport, landscaping, biodiversity, open space, the proposed local centre and school provisions makes no specific reference to healthcare. We can only therefore assume this is covered by the final bullet point referring to other supporting infrastructure requirements. Yet again, this indicates a lack of priority for healthcare which we feel is wholly inappropriate to the largest development proposed for Chipping Norton, a location with an ageing population and known demands on its healthcare provision.

Paragraph 5.2 identifies relevant considerations, including Evidence to the Local Plan Examination in 2017 made by the site promoter, but fails to reflect the evidence provided by other attendees including the Health Centre. It also refers to the aims and aspirations of the Chipping Norton Neighbourhood Plan (2016), which includes a specific aspiration as follows:

“Provide additional car parking within or adjacent to the London Road healthcare complex to meet the future needs of people accessing these facilities.”

We wish to point out that we fully support the aspiration of the Local Plan, which incidentally makes 19 references to health and wellbeing. We also want to make it clear that there is no additional land available within the existing CNHC site. The car park is already at capacity, with visitors to the Centre regularly having to park in the access road, and there is no additional space available for development. Without an expansion of the site into adjacent land, no additional parking or healthcare capacity can be delivered.

Paragraph 5.11 on page 35 and 5.17 on page 36 of the document identify a particular need for the SDA to accommodate housing aimed specifically at the elderly and disabled, and at young families. We welcome the addressing of these needs but recognise that this will again add further pressure on the healthcare facilities in the immediate locality.

Having a high-quality health centre on the doorstep will represent a major advantage to residents, but only if it has the capacity to provide them with services. The majority of demand for healthcare comes from those under 5 and over 85 years of age. At CNHC, over 45% of the patients are over the age of 50. Catering for the needs of these future residents cannot be guaranteed during the entire delivery period of the SDA if no additional capacity can be created at the Health Centre. This must be avoided.

Q2d Do you have any other views on the type of new homes that should be built at East Chipping Norton SDA?

Yes. We welcome that the proposed mix caters specifically for elderly, disabled and young families, but only if adequate healthcare provision for such future residents can be suitably accommodated on a suitable site (i.e. the Health Centre).

Q3c Should there be a particular emphasis on meeting the needs of essential local workers (i.e. those who provide front line services in areas including health, education and community safety)? How can this best be achieved?

Yes. For the CNHC and nearby Community Hospital to continue to attract staff there needs to be an adequate provision of affordable local housing nearby. With the concentration of healthcare facilities for Chipping Norton and the surrounding areas located adjacent to the SDA it will be both effective, particularly in cases of emergency or increased demand on healthcare (such as Flu epidemics), and sustainable for staff to be located within the immediate vicinity. This can best be achieved through the provision of affordable housing specifically available to key workers serving the local catchment.

Paragraph 5.30 offers an opportunity to consider the provision of specialist accommodation for the elderly and disabled and seeks views on whether further provision is desirable in terms of maintaining a balanced demographic in the town.

Our view is that this is not a matter of maintaining a balanced demographic but recognising the existing profile of Chipping Norton and ensuring that this is adequately catered for going forward. This is already a reality for the provision of healthcare. According to the City Population Index, as at 2017, the percentage of Chipping Norton residents over 65 was already 22.9% compared to 18% across the UK. Looking in a bit more detail at Chipping Norton, the position is as follows:

- 16% of the population is over 70
- 26.5% of the population is aged between 50 and 69
- Oxfordshire County Council population forecasts 2015-2030 more than double the growth of the previous 15-year period, with people aged 85+ expected to increase by 92%.
- 96% more people over 65 are moving into Chipping Norton than moving out⁵

This clearly signals both the need for appropriate housing to accommodate this rapidly ageing population, and recognition of the impact this will have on healthcare capacity. It is anticipated that within the next 10 years over 45% of the local population will be over 65. With the SDA in isolation representing an increase of around 43.7% of the town's current population⁶, and the significant additional catchment that the CNHC already serves, it is apparent that a service already at capacity will not be able to cater for the needs of such significant age related and population growth without additional capacity.

Q4b Should the site provide specialist accommodation for the elderly and/or those with a disability or do you think there is already sufficient existing provision locally?

In our opinion the demographics demonstrate that the demand for all types of provision for elderly people is going to expand exponentially in the foreseeable future. It is therefore prudent to provide suitable housing for this group, who are inherently likely to include a significant percentage of less able people.

This needs to be part of a co-ordinated approach that also provides adequate services for older and less mobile residents, including healthcare, transport, and local community services. If the housing is

⁵ ONS

⁶ ONS mid year estimated 2016 total population of 6,590

provided in isolation of adequate supporting infrastructure, in particular healthcare, then the identified population going forward will be inadequately served by this planning process.

Q5 Business land provision:

No Comment

Q6 Character and Form of Development

No Comment

Q7 Vehicular access including the eastern link road

No Comment

Q8 Active Travel

Q8a Do you agree that the development of the East Chipping Norton SDA should place a strong emphasis on “active travel” (Walking, cycling, riding etc.)?

Yes. Anything which positively encourages a healthy lifestyle is welcomed.

Q9 Mitigation of impacts on the landscape

No Comment

Q10 Achieving a net gain in biodiversity

Q10c Do you have views on how developer contributions could potentially be used to improve biodiversity within the site and the wider area? Do you for example support the development of a corridor enhancement project to direct developer money towards a “linear biodiversity conservation corridor” between Chipping Norton and Enstone (i.e. Glyme and Dorn CTA, nearby SSSIs and BBOWT reserves)?

We note the proposal for developer contributions to be used to improve biodiversity within the site and the wider area. Whilst we recognise this as a matter of importance, we feel that it should not take priority over the need to ensure that adequate healthcare facilities are available to those who will live on the site and in the wider area. We therefore feel strongly that the allocation of any available developer contributions should be considered in the light of the local healthcare need and capacity constraints, and that contributions to ensuring healthcare sustainability should be actively considered alongside other priorities identified in the document.

Q11 Open Space Provision

Overall, we support the provision of active open space within the SDA to promote healthy activity and wellbeing.

Q12 A new local centre

No Comment

Q13 School Provision

No Comment

Other supporting infrastructure

Paragraph 5.127 on page 63 confirms that Local Plan Policy CN1 requires that consideration is to be given to the issue of healthcare provision including the capacity of CNHC to absorb additional patient numbers. **We are somewhat dismayed to see that this requirement is buried in a paragraph of the document that relates primarily to sewerage connections and groundwater.** It is disappointing that the issue of healthcare does not appear to merit a paragraph of its own. This indicates to us and others that the issue is considered to be a low priority for the SPD and the SDA. This is clearly wrong for all the foregoing reasons.

In terms of the issue of capacity, since the evidence was put forward in July 2017, patient numbers have increased by over 3% (some 464 additional patients) and appointment waiting times are now typically 3-4 weeks. The car park is operating at capacity, and on many occasions, patients have no option but to park in the access road to the centre. This is recognised in the aspirations of the Neighbourhood Plan, as listed at paragraph 5.128. The site of the CNHC is fully utilised.

In the wider context, the number of GP partners available to provide services in the North Oxfordshire area (in which CNHC operates) has fallen significantly, with losses from practices in Sibford, Wychwood, Bloxham and Cropredy. Whilst the affected practices can use the services of Locum GP's to meet immediate demand, they are unable to recruit locally. The offer of a small rural practice does not appeal to a large number of Doctors who are seeking careers in the wider skills base of a multi-disciplinary environment such as CNHC. It should also be noted that the use of Locums, whilst valuable, offers a somewhat disjointed and less personal service to local people and is very expensive. It is not therefore offering value for money to the public purse. This can better be achieved via a developing and expanding Hub.

CNHC is the only practice operating in the town of Chipping Norton, and the primary Hub for the North Oxfordshire CCG area.

An increase of over 40% of the town's population is anticipated as a direct result of the development of the SDA. Demand on services will further be stretched by other planned developments in and around Chipping Norton. Neither other practices within the wider area nor the CNHC will be able to accommodate the healthcare needs of all the residents of the SDA. The only deliverable option is to increase capacity at the Chipping Norton site. This cannot be done within the existing site area. The matter of capacity in health care provision is therefore fundamental to the sustainability of the development, and to the health and wellbeing of those who will move into it and require such facilities.

Q14 Supporting Infrastructure

Q14a What in your opinion are the key pieces of infrastructure that are needed to support East Chipping Norton SDA? Is there anything we have not already mentioned that needs to be delivered?

The key piece of infrastructure needed to support the East Chipping Norton SDA is adequate healthcare capacity.

Land needs to be safeguarded adjacent to the existing CNHC to enable additional capacity to be provided to meet the healthcare needs of the future residents of the SDA. This point is not made in the Issues Paper, and no priority appears to have been given to the essential provision of adequate healthcare.

Furthermore, developer contributions should be prioritised to meet the needs of people, and consideration should be given to the ring-fencing and allocation of such funds for healthcare provision.

Q14c Do you support any of the “aspirational” projects identified in the Chipping Norton Neighbourhood Plan? If so, do you think they should be addressed through the East Chipping Norton SDA?

Yes. We support the aspiration to “provide additional car parking within (not possible) or adjacent to (possible) the London Road healthcare complex to meet the future needs of people accessing these facilities”. We suggest this should be extended to include land to enable the capacity of the health centre to be expanded to meet the demand that will be generated by the SDA, and wider developments in Chipping Norton. With no other doctor’s surgery in the town, both the capacity of the service and its car park need to be addressed.

Q14d Do you have any other general comments or observations on this issue?

Yes. **We are strongly of the opinion that healthcare capacity should be positively addressed through the East Chipping Norton SDA.** It would represent a failure of the planning system if something as important as the provision of healthcare facilities to support the future population of a development of the magnitude planned for the SDA is not addressed as a matter of priority. If not adequately addressed, there will be a measurable negative impact on both the existing and future residents of Chipping Norton and the surrounding areas.

Concluding summary:

- To ensure a sustainable development at the SDA, the SPD needs to positively address the issue of healthcare capacity.
- The CNHC is the only feasible location in which additional effective capacity can be provided. Whilst built to accommodate growth, the increase in demand and patient numbers, and the erosion of services in the surrounding area has meant that the planned capacity is no longer available to address the needs of future residents of the SDA, or wider planned development.
- The CNHC site is at capacity in terms of built form and car parking provision. It will not be practical or possible to increase capacity on the existing site whilst maintaining an effective service, and without significant risk to existing patients.
- Additional, available and adjacent expansion land is therefore required to be safeguarded to enable a suitable healthcare service to be provided to the growing and ageing population, and to cater directly for the needs of the SDA.
- If healthcare capacity is not adequately addressed through the SPD for the East Chipping Norton SDA there will be a measurable negative impact on both the existing and future residents of Chipping Norton and the surrounding areas.

Prepared by:

Duncan Chadwick, MRTPI, Partner, David Lock Associates

Val Conway, MRICS, Senior Associate, David Lock Associates

Appendix 1: Representations from NHS Oxfordshire CCG:

BEAN, Chris (CHIPPING NORTON HEALTH CENTRE)

From: CAMPBELL, Fergus (NHS OXFORDSHIRE CCG)
Sent: 28 February 2019 15:31
To: planning.policy@westoxon.gov.uk
Cc: BEAN, Chris (CHIPPING NORTON HEALTH CENTRE); FISHER-OCCG, Neil (NHS OXFORDSHIRE CCG)
Subject: East Chipping Norton SPD consultation - response

Chipping Norton SPD – response from NHS Oxfordshire Clinical Commissioning Group

OCCG anticipates that population growth in Chipping Norton will require additional primary medical infrastructure in the local area which should be supported by developer contributions. The proposed development of 1,200 homes will require additional capacity to provide sufficient primary medical care. Based on WODC advised occupancy estimates of 2.4 people per new dwelling such a development is likely to lead to a population increase of around 2,880. The need to support health care infrastructure for a growing population should be made explicit within the SPD.

Chipping Norton Health Centre is a new, and well-specified primary care building opened in 2015. It is co-located with Chipping Norton Community Hospital and Henry Cornish Care Centre forming a health campus which provides a wide range of health and social care services. It is very conveniently located for the proposed East Chipping Norton development. Expansion of buildings may require re-location of the some of the existing car parking plus additional parking in proportion to the building growth. The GP practice are keen to ensure that space for future development is safeguarded in any proposed scheme.

OCCG expects that future primary medical care needs for Chipping Norton and surrounds will be provided from the single health campus site, building on the good facilities already in place. Exceptions might include ICT infrastructure needed to support integrated care, or facilities supporting medical care to be delivered in care and nursing homes, or extra-care facilities.

The [NHS Long Term Plan](#) published in January 2019, and the subsequent [five-year framework for GP contract reform](#) set out plans to set up Primary Care Networks and set out their future development. This builds on existing patterns of integrated working at scale and providing services closer to home in which the Chipping Norton Health Centre practice has taken a leading role in the local area. These developing models of care will have an impact on primary care infrastructure requirements in future with a wider range of services delivered through primary care, and more integration across practices in the local area.

Do contact me if you need further information or clarification.

Fergus Campbell | Locality Co-ordinator – North & West | NHS Oxfordshire Clinical Commissioning Group
Jubilee House 5510 John Smith Drive Oxford Business Park South Oxford OX4 2LH | Tel: 01865 336828 | Mobile: 07798 693940
Email: fergus.campbell@nhs.net | Web: www.oxfordshireccg.nhs.uk

Appendix 2: Signature representations from users of the CNHC

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Pauline Jackson	[REDACTED]		27.2.19	
KAREN MURPHY			27.2.19	KOR M.10
VALERIE FLETCHER			27.2.19	Valerie Fletcher
Ries Swales			27.2.19	
Elaine Parsons			1-3-19	E. Parsons
Sheila Mountain			1.3.19.	S. Mountain
Hilary Barber				
Wendy Busby			4/3/19	W Busby
Emily Alga			4/3/19	





Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
SARA FORBES	[REDACTED]		28.07.19	Sara Forbes
ANN PEET			28.2.19	[Signature]
Catherine Salmer			28.2.19	[Signature]
ELOISE RUX-BURTAN			21/3/19	[Signature]
ELLIOT RUX-BURTAN			1/3/19	[Signature]
D. Stevens			1/3/19	D Stevens
Poppa de Villeneuve			01/3/19	[Signature]
D. Harrold			01/3/19	[Signature]
P. Smart			1/3/19	P Smart

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Sue Harris	[REDACTED]		26 FEB 2019	
PETER SINKLEY			26/02	
CAROL STRAUB			26/02/19	C. Straub
JACQUES STRAUB			27/2/19	J. Straub
Roy Burden			27/2/19	R.W. Burden
PAULINE RITCHIE			28/2/18	P Ritchie
ANNE PRICE			28/2/18	Anne Price
WILL PRICE			28/2/18	w a p
JACQUE MAHON				








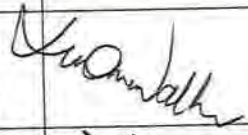
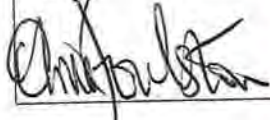

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
P.S. Aylmer	[REDACTED]		25/2/19	[Signature]
D. Goodall			26/2/19	DAGoodall
S. Versi			26/2/19	S. Versi
J. Kinon			26/2/19	John
J. Sheppard			26/2/19	[Signature]
N.D. Rose			26/2/19	[Signature]
S. Kennedy			26/2/19	[Signature]
Ann Davidson			27/2/19	AD
S. Keen			27.2.19	Keen

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
M COMPTON	[REDACTED]		21.02.18	
J. Compton			24.02.18	
A. BAKER-HADSI			22.02.18.	
RICHARD COLLINGS			22.02.19	
Jan Armstrong			22.02.19	
Jennie Houlahan			25.2.19	
Sandy Macmillan			25.2.19	
Lizanne Walker			25/2/19	
			25 /2	

0

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
DAR HAWLEY	[REDACTED]		22-2-19	
Gretel M'EWEN			25-2-19	
David M'EWEN			25-2-19	
L. Natchemui				
NCP Phillips			25/2/19	NCP Phillips
Sarah ABER			25/2	
			25/2	M. ABER
Diamond VERSI			26/2/19	
R+S TOZER			26/2/19	TOZER

Housing Development at Chipping Norton



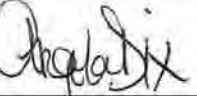

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Linda Morgan	[REDACTED]		19.2.19	
C. Hazell			19.2.19	
D. Chapman			19-2-19	
C. GREFNO			19-2-19	
Judith Walters			20.2.19	SA Walters
Ewan Caws			20th Feb. 2019	
Jane Sweet			20/2/19	Jane
B.P.			20/2/19	B.Price
Sue Pearman			20/2/19	

OUT 504





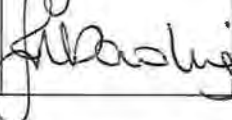
Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
BEN DAVINE	[REDACTED]		20.2.19	
JOHN DAVINE			20.2.19	
ADAM ARZBERGER			20/2/19	
Nina Sty				
DASWICK WOOD			21.2.19.	
HUGH ROBERTSON			21/2/19.	
ANGELA ANGELA DIX			21-2-19	
BENJAMIN SMITH			21.2-19	
Robin Howard			20.2	

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed	
Donna Shuime	[REDACTED]		15/2/19		
TAMZIN STALLARD			15/2/19		
HAWES. Henry				15/2/19	HAWES
P. ASBOTS				18/2/19	
G. Dean				19/2/19	
E. SHEPHERD				19.12.19	E. Shepherd
S. COLLINS				20.2.19	S. Collins
J. Watts				20.2.19	J. Watts
J. BOWLING				20.2.19	







Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Kelly Sanders.	[REDACTED]		14/2/19,	Duffy Jones
Christine Wilson			14/2/19	[Signature]
Mark Harrison			15/2/19	M. Harris
J. Mills			15/2/19	J. Mills
J. Smith (JO SMITH)			15/2/19	to [Signature]
CARR [Signature]			15/2/19	[Signature]
HARRIET BALDWIN			15.2.15	[Signature]
REBECCA ROBERTSON			15/2/19	[Signature]
LUCINDA WOOD			15/2/19.	[Signature]

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Mrs J Harris	[REDACTED]		18 th Feb	
Mrs Edwards			18 Feb	
P. Hart			18 Feb	
DAISY Stannard			18 Feb	
DAN BIRD			18 Feb	
Mrs A Burden			18 Feb.	A Burden AI Burden
A. PINGLO			19 th Feb	

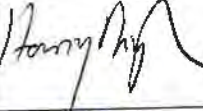


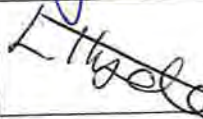





Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
MARTIN ELSON	[REDACTED]		13. 2. 19	MJEV
S. CARPENTER			13. 2. 19	S. Carpenter
R Alderman			14. 2. 19	R Alderman
J. Ryman			14/2/2019 RYMAN.COM	J Ryman
K Ridge.			14/2/2019	K Ridge
Joan Sweeten Smith			14/2/19	Joan Sweeten Smith
Derek Sweeten-Smith			"	Derek Sweeten-Smith
Mr A CLIFTON			17/2/19	A Clifton
Susan Fane			15/2/19	S Fane


Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
HARRY + NINA DINGHAM	[REDACTED]		13/2/19	
Wendy Willoughby			13/2/19	
Bob Johnston			13/2/19	
LISA HYDE			14-2-19	
Sarah Kettwell			14-2-19	
Lorne Sprou GILMORE			,	
Jackie Tinkler				
Jeremy CATLING			14-2-19	
			14/02/19	

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
PAUL GOWERS	[REDACTED]		11/2/2019	Paul Gowers
ROBERT MCCOY			12/2/2014	
EMMA KENNEDY			12/2/2019	Emma Kennedy
LOU DUMBLETON			12/2/2019	L Dumbleton
KYLIE URWIN			12.2.19	Kylie Urwin
Linda Johnson			12/2/2019	L.M. Johnson
Laetisia Carter			12/2	Laetisia Carter
Zoë Thornburgh			12/02/19	Zoë Thornburgh




Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
YVONNE PERROTT	[REDACTED]		6/2/19	
KEVIN PERROTT			6/2/19	
Chris Perrott			7/2/19	
Be Perrott			10/02/19	
Rose Perrott			10/02/19	
Pam Wilton			12/2/19	
A. Huxley			12/2/19	
R. CHARE			12/2 2019	

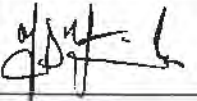




Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Pat Corbett	[REDACTED]		09/02/19	
Louise Appleton			08/02/19	
Michael Anderson			8/2/19	
Paul			8/2/19	
Sally Bishop			11/2/19	
Jenny Bodica			11/2/19	
Gemma North			11/2/19	
Chris Knowles			11/2/19	










Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
J. D. Finch	[REDACTED]		6/2/2019	
M. Packer			6/2/19	M Packer
A. BUNO.			6/2/19	
L HERBY			6/2/19	
S. Scarbrock			6/2/19	S.M. Scarbrock
S. WILKES			6/2/19	
E. Douglas			6/2/19	ED
S. MINCE			6/12/19	S Mince
C. LEECIAN			6/2/19	

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
G. CHESTER	[REDACTED]		6.2.19	
G.L. CHESTER			6.2.19	
B.C. Salmon			com 7.2.2019	
C. HARRISON			7.2.19	
C. Chappell			7.2.19	
K. Houlton			7/2/19	
H.C. BRADY			7/2/19	
G. Thomas			8/2/19	
A. WATKINS			08-02-19	


Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Deeta Keegan	[REDACTED]		06.02.19	Kea
Nicola			06.02.19	N. Mott
Yusef Mehmud			06.02.	YJP
Elaine Gardner			7/2/19	EG
Emily Awad			7/2/19	Emily Awad
Christine Dowd			7/2/19	C Dowd
Elizabeth Birchall			7-2-19	Elizabeth Birchall
GERALD FAZACKERLEY			7-2-19	Gerald

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Kara Cudge			4/2/19	
Monica Tysoe			4/2/19	M Tysoe
DAVID WHATNEY			4.2.19	D Whatney
BYBACUMONT			4.2.19	B/Bacumont
A. BOWMAN			5/2/19	
D Burgess			5/2/19	
P. Hickman			5/2/19	P. Hickman
J. Rutherford			5-2-19	J. Rutherford
L. M. ...			5-2-19	L. M. ...

Housing Development at Chipping Norton

I would like to raise my objection due to a lack of clarity in the plan in regard
of provision of primary health care to meet extra patient demand

Name	Address	Contact email or telephone	Date	Signed
Susan MacConnell- MASON				
MARGARET BISHOP			5-2-19	MARGP
JONATHAN HAWTIN			5/2/19	<i>[Signature]</i>
Pauline MOSEY			6/2/19	<i>[Signature]</i>
Jane Louise LITTLEDALE			6/2/19	J. Louise Littledale
Sue Hemp			6/2/19	Sue
EWAN WOLHART SAC			06/02/19	<i>[Signature]</i>
Cooper Harris				<i>[Signature]</i>
Margaret Baynton			6/2/19	Margaret

Healthcare Facilities

As previously discussed throughout this report, healthcare provision is a key issue raised that should be treated as a priority. To address healthcare capacity, the SPD should use stronger language that ensures adequate space is safeguarded to enable the expansion of the Chipping Norton Health Centre and /or require appropriate healthcare provision (including suitable parking) as part of the overall development. Given the addition of older people's housing both presently and in the future, and population projections, providing adequate healthcare infrastructure is essential.

.....

[REDACTED]

From: Jan Cliffe [REDACTED]
Sent: 19 August 2020 11:55
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: East Chipping Norton development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

Chipping Norton already services a large hinterland of surrounding village communities and, whilst welcoming new development to allow our town to continue thriving, there are issues of particular concern to me for which the CIL would be vital.

1. increased road traffic leading to increased pollution levels already caused by the large amount of heavy lorries etc. passing through narrow roads in town centre
2. Health Centre building and staff already stretched to over-capacity would need to be enlarged considerably
3. drainage issues and water pressure problems already an issue in the whole of this area would need to be addressed for the proposed development
4. extra car parking now becoming necessary as there are so many older properties in town with no vehicular access, and people coming into town from elsewhere

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Janice Cliffe

[REDACTED]

From: Christine Clinch [REDACTED]
Sent: 20 August 2020 15:23
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town. As an interested member of the public, I have already spoken to the Chipping Norton Town Council about the pollution and traffic in the centre of town from the A44 traffic. Similarly, the Health Centre, even pre-Covid, was struggling to cope with the number of patients living in the town and the situation will be much worse with the increased population resulting from this development.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Mrs Christine Clinch
[REDACTED]
[REDACTED]
[REDACTED]



Virus-free. www.avast.com

To: West Oxon District Council

RE: East Chipping Norton

Dear Sir/Ms

Regarding East Chipping Norton, I am writing to strongly urge you to let the Town Council have the full community infrastructure levy as the enormity of the new town will require so much in the way of planning and pre-planning in order to help design this development in a way which will make it a credit to the whole area over which you have some control.

The Council will need every penny to properly oversee East Chipping Norton.

Yours faithfully: a long-time resident

Francis Coates

From: Coleman Family [REDACTED]
Sent: 21 August 2020 16:08
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a resident of Chipping Norton I am very concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The East Chipping Norton development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

At this time when other towns have cafe tables spilling out over the pavements, Chipping Norton still has two A roads- the A44 and A361 - running straight through the main shopping street complete with large heavy goods vehicles. This needs to change- and expanding the town was supposed to bring infrastructure investment to tackle this problem.

There is also a need for more car parking provision for the town centre and better public transport links.

Chipping Norton is now a growing town but has no town park- only a recreation ground on rented land which limits the facilities that can be provided and has no car park or public toilets. This is another project that requires infrastructure and investment. Access to open space has been important to all communities during the current pandemic and will continue to be so.

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

Yours sincerely

Sandra Coleman
[REDACTED]

Oliver Murray

From: Katharine Cookson [REDACTED]
Sent: 18 August 2020 14:19
To: Planning Policy (WODC)
Cc: Jeff Haine
Subject: CIL consultation response/ East Chipping Norton Development

Dear Mr Chris Hargraves

As a local resident I am deeply concerned that the East Chipping Norton development could be exempt from the Community Infrastructure Levy (CIL) if this is set at a zero rate as proposed in your consultation paper.

The development will increase the size and population of our town considerably and will therefore put pressure on our already stretched infrastructure. It is important that improvements in infrastructure and community facilities are made to accommodate this growth in the town.

All too often financial greed overtakes local issues that particularly concern me, such as:

- *pollution levels*
- *increased road traffic - regretfully, this has increased enormously since I moved into the area just 4 years ago*
- *the need for improved access to already overstretched health services*
- *worryingly underfunded community services*
- *access to open space and recreation facilities which have a direct impact on our threatened wildlife and increasing mental health and obesity issues*

It is only right that those profiting from house building should be asked to invest properly in the infrastructure and services which will affect the quality of life in our town for many generations to come – indeed this is what those living in Chipping Norton were promised when this significant development was originally proposed.

I am all for the development of affordable housing - what we don't need is more expensive 4 bedroom houses.

Please help us to protect this beautiful area and the many vulnerable people in our community rather than property developers' financial greed.

Yours sincerely

Katharine Cookson

Chipping Norton
[REDACTED]

[REDACTED]

From: Michael Cooper [REDACTED]
Sent: 17 August 2020 11:58
To: Planning Policy (WODC)
Subject: East Chipping Norton Development Vision. FAO Chris Hargreaves

Dear Sir,

As a long standing local resident I am concerned at the suggested plan not to impose a CIL on the developers by giving it a zero rating.

Whilst broadly understanding the need to increase the housing stock it is only fair and reasonable that the developer should contribute to the increased need for appropriate infrastructure. The road infrastructure amongst others has been an issue in Chipping Norton for some considerable time.

Too often developments take place seemingly without adequate provision or planning for this. It is only right that the developers should contribute to the increased need for transport, schools and health care provision. An appropriate contribution via a CIL would help and the justification for its omission is unclear.

Can you please advise me what CIL contributions have been made to W.O.D.C. for all the other significant developments in West Oxfordshire in the last 3 years?

Yours Faithfully

M.N. Cooper

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]