

**Preliminary Draft Charging Schedule
Consultation Report
Regulation 15(7) Statement
February 2015**

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1. Introduction

What is the Community Infrastructure Levy?

- 1.1 The Community Infrastructure Levy (CIL) is a new levy that local authorities can choose to charge on new developments in their area. The money can be used to support development by helping to fund strategic local infrastructure that the council, local community and neighbourhoods want.
- 1.2 CIL is a fixed, transparent charge which means developers have more certainty regarding what they have to contribute from the very start of the development process. Because the purpose of CIL is to support growth rather than mitigate impacts of specific developments, it can be used more strategically than s106 contributions.
- 1.3 Under the Community Infrastructure Levy Regulations (2010) (as amended), the amount of CIL to be paid has to be explained in a formal document called a Charging Schedule. The Charging Schedule needs to be examined by an independent inspector to ensure we have met the legal requirements. Once the Council have adopted the Charging Schedule, it will sit alongside the New Local Plan 2031 Part 1, and help us deliver our development objectives.
- 1.4 The process of developing and preparing the Charging Schedule needs to meet the statutory consultation requirements. In preparing the CIL Charging Schedule we need to prepare two iterations, and undertake two rounds of public consultation on these documents. The Charging Schedule must be supported by evidence, which includes the economic viability of new development and the area's infrastructure needs.
- 1.5 We have consulted on our Preliminary Draft CIL Charging Schedule and are now consulting on the Draft Charging Schedule.

What is this consultation report?

- 1.6 The purpose of this consultation report is to summarise the consultation that has taken place, the comments that have been submitted, our responses to these comments, and overall, the ways in which we have met the requirements set out in the CIL Regulations.
- 1.7 Appendix 2 sets out our comments on all of the responses we received at the Preliminary Draft stage stating whether we have made changes to reflect the response, and our reasoning for why we have/have not made amendments.

How to find your way around this document?

- 1.8 Within this consultation report we set out the following:
 - Section 1: Introduction to the CIL Charging Schedule and this consultation report.
 - Section 2: The stages of consultation we have carried out so far and what happens next
 - Section 3: The consultation we carried out on the Preliminary Draft CIL Charging schedule and a summary of comments we received.

- Appendices: We set out a copy of consultation material including our consultation leaflet, and all the responses and our officer comments received on the Preliminary Draft Charging Schedule. [to be added]

Where to get more information

- 1.9 The revised Draft CIL Charging Schedule and all the documents that support the proposed charging schedule can be viewed on our website:

www.whitehorsedc.gov.uk/cil

Copies are also available by contacting the planning policy team at:

Email: planning.policy@whitehorsedc.gov.uk or telephone (to be confirmed)

2. Stages of consultation

What are the stages of consultation?

STAGE OF CONSULTATION	DATES
Consultation on the Preliminary Draft CIL Charging Schedule	7 November 2014 – 19 December 2014
Consultation on the Draft CIL Charging Schedule	23 February 2015 – 23 March 2015

What was consulted on at the Preliminary Draft Charging Schedule stage?

- 2.1 Draft CIL Charging Schedule: To charge CIL the Council must prepare, consult and adopt a Charging Schedule setting out the levy rates.
- 2.2 The CIL Viability Study (October 2014): Explains the development viability evidence on which the CIL rates are based.
- 2.3 The Infrastructure Funding Assessment (2014): Provides a list of the projects or types of infrastructure that are needed to support the growth which is planned over the emerging Local Plan 2031 Part 1 plan period. The total indicative cost of these projects, where known, has then been compared with the funds that are known or are expected to be available from other sources including the Local Enterprise Partnership (LEP) funding. The Funding Assessment reveals a funding gap which CIL could make a significant contribution towards. The Funding Assessment is required to demonstrate the need to levy CIL.
- 2.4 The CIL Charging Schedule background document: Provides background to the Draft CIL charging schedule explaining the general principles of CIL, the evidence base and the methods used to arrive at the proposed rates.

What happens next?

- 2.5 We are now consulting on the Draft CIL Charging Schedule. Once we have finished consulting we will collate all the responses we receive and see whether we need to make any further modifications to the Draft Charging Schedule. Where any modifications are proposed, the CIL Regulations (19) and (21) (as amended) requires us to produce a 'Statement of Modifications' and allow a period of four weeks for consultees to submit a request to be heard by the examiner in relation to those modifications, beginning on the day which the Draft Charging Schedule is submitted to the Examiner.
- 2.6 We will submit the revised Draft CIL Charging Schedule to the CIL Examiner along with a consultation statement, which will set out our officer comments on all the responses we received at each successive stage of consultation, and our evidence base.
- 2.7 The Draft CIL Charging Schedule will then be examined by an independent inspector, at a public hearing, and this person will determine whether the Charging Schedule has met the requirements of the CIL Regulations (2010) (as amended).

- 2.8 The format for the CIL examination hearings will be similar to those for development plan documents and the independent inspector may determine the examination procedures and set time limits for those wishing to be heard to ensure that the examination is conducted in an efficient and effective manner.

STAGE	WHEN WILL IT OCCUR?
Consultation on the revised Draft CIL Charging Schedule	23 February 2015 to 23 March 2015
Submit to the Planning Inspectorate	March 2015
Pre-hearing meeting if required	Tbc
Examination in Public	Provisionally July/August 2015
Receive Inspector's report	October 2015
Adoption	December 2015

How many comments were received on the Preliminary Draft CIL Charging Schedule?

- 2.9 We received 51 responses to the consultation from landowners / developers / groups and individuals. The responses focused on a range of issues including the Draft Charging Schedule, Infrastructure Delivery Plan, CIL Viability Study and general comments. A full list of respondents can be found in Appendix 1.
- 2.10 Of the 48 responses 13 were from local residents, 14 from the development industry, 11 from town and parish council and 13 from other consultees such as Oxfordshire County Council.

3. Summary of responses

- 3.1 The responses we received on the Preliminary Draft Charging Schedule are set out in full with our officer comments in Appendix 2. The comments received have informed the preparation of the Draft Charging Schedule. We have set out a summary of the responses received and our officer response to the issues raised below.

Infrastructure

- 3.2 With regard to the supporting Infrastructure Delivery Plan (IDP) document and Infrastructure Funding Assessment, some respondents highlighted concerns about the absence of certain infrastructure requirements within these documents including infrastructure requirements for health and funding arrangements for items such as health facilities.
- 3.3 A number residents were concerned by an apparent lack of comprehensive funding details for certain infrastructure required towards the end of the plan period. Concerns were raised by some residents and parishes that there was a 'funding gap' and the council should provide additional details on the other funding sources.
- 3.4 A number of responses including English Heritage, Natural England and Wantage Deanery suggested items for inclusion on the Regulation 123 list.
- 3.5 Harwell Parish Council noted that the Regulation 123 list should include named infrastructure projects, citing that at present projects were mentioned as exclusions to be covered by S106 only.
- 3.6 It was also suggested that the rates should directly relate to the infrastructure needed. In this regard, reference to Faringdon was made as an area seeing significant growth but with a lower CIL rate for residential development than elsewhere in the district.
- 3.7 Others commented on the draft Regulation 123 list and raised concern over the appropriateness of infrastructure items included, namely the New Thames River Crossing as part of the Science Vale Transport Package.

Comments

- 3.8 In determining the size of our total or aggregate infrastructure funding gap, we have considered known and expected infrastructure costs and the other sources of possible funding available to meet those costs. This process has identified a CIL infrastructure funding target. This target has been informed by a selection of infrastructure projects or types (drawn from our infrastructure planning of the district) which have been identified as necessary to enable the delivery of planned growth within the district, and which could be funded through CIL in whole or in part. The Government has recognised that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. The focus should be on providing evidence of an aggregate funding gap that demonstrates the need to levy the Community Infrastructure Levy. It is stated in the IDP that when further certainty on funding sources is known the infrastructure funding gap will

reduce. The IDP will be updated in response to the Preliminary Draft Charging Schedule consultation and the pre-submission consultation on the Local Plan 2031 Part 1. The IDP will include additional items, and review some of the indicative cost assumptions.

- 3.9 A charging authority is required to use an area-based approach, involving a broad test of viability across their area, as the evidence base to underpin their CIL charges. Unlike Section 106 agreements, the CIL Regulations require CIL rates to be set within the context of development viability as opposed to infrastructure need. It would therefore not be within the scope of the CIL Regulations to pro-rotate the total cost of infrastructure across all development.
- 3.10 CIL Regulation 123 requires charging authorities to set out a list of projects or types of infrastructure that it intends to fund through CIL, and therefore many of the infrastructure costs for which cover had been sought through Section 106 planning obligations will be paid through CIL. Section 106 planning obligation requirements will be scaled back to those matters directly related to a specific site, and these infrastructure areas have been clearly excluded from the Regulation 123 list. Additional information on the council's approach to the use of S106 following the adoption of CIL has been included within this document and the council will produce a Planning Obligations Supplementary Planning Document (SPD) in due course.

Viability assumptions

- 3.11 A series of specific responses were made with regard to the various assumptions used in the viability modelling. These comments were mainly, although not exclusively made by the development industry.
- 3.12 In its response Asda Stores Ltd stated that the proposed retail CIL rates would discourage larger retail development and would put at risk the range, variety and choice of retailing. They also stated that the Viability Study contains retail development assumptions that may not make sufficient allowances for the costs involved in obtaining planning permission for a development scheme. If allowances applied for Section 278 and Section 106 were set too low then the CIL rates would be artificially inflated.
- 3.13 There was a suggestion by some residents and parishes that the level of developer profit of 20% was excessive and not a true representation of development within Vale. It was also suggested that a reduced developer profit would allow for a greater CIL receipt. Conversely, a series of developers suggested that the level of developer profit is insufficient and does not reflect the costs of development within Vale.
- 3.14 In its response the Harwell Campus Partnership cited the National Planning Policy Guidance in that *“Different types of residential development, such as those wanting to build their own homes and private rented sector housing, are funded and delivered in different ways. This should be reflected in viability assessments.”* The response went on to state that Private Rented Sector (PRS) housing development was not considered or tested in isolation from other residential tenures. In considering residential development, the assessment differentiates only between market and affordable. PRS should not support the levels of CIL proposed.

- 3.15 The marketing, disposal costs, interest rate and contingency costs were cited as being too low (Home Builders Consortium, Gladman Development). Gladman Development commented that the increase in build costs since the viability work was carried out should factored into the appraisal.
- 3.16 Gladman Development stated that landowners would require an land value uplift of 30% as opposed to 20% to bring forward sites for development
- 3.17 Details on the modelling assumptions for Retirement/Sheltered Housing were required by McCarthy & Stone and Blue Cedar Homes
- 3.18 Two developers queried the assumed level of Section 106 contributions following the adoption of CIL, citing an example site where Section 106 contributions are currently being negotiated at a higher level than that assumed in the IDP and CIOL viability study.

Comments

- 3.19 The CIL Viability Assessment is a broad assessment on viability across the district informed by realistic cost assumptions, including developer profit. The National Planning Policy Framework states that viability should consider “competitive returns to a willing landowner and willing developer to enable the development to be deliverable.” The NPPF recognised that this return will vary significantly between projects to reflect the size and risk profile of the development and the risks to the project. A developer profit of 20% is an appropriate balance across the district for the assessment of CIL viability, rather than that of any individual scheme. The council, within the Regulations and the broad terms of the assessments required, has sought to maximise levy returns to support the delivery of infrastructure whilst also ensuring that the rate set does not jeopardise development.
- 3.20 The council does not have evidence which points to differential values for rental and for-sale sectors. The council considers that the viability of the private rental sector is adequately covered through assessment of the viability of market housing.
- 3.21 The viability assumptions are the result of a combination of local evidence, agreement with developers at a developer workshop and professional judgement. The assumptions used including the level of land value uplift necessary to bring forward sites for development are considered appropriate on balance across the district for the assessment of CIL viability, rather than that of any individual scheme.
- 3.22 The council recognises that development costs vary over time, the CIL rates as consulted upon within the Preliminary Draft Charging Schedule were based on the best available evidence at the time of preparation, and the key assumptions were also sensitivity tested. Prior to submission or examination the council may seek to refresh development scenarios within the viability study. The council is aware of the increase in build costs, any future refresh of specific elements of the viability study prior to submission or examination will take into consideration revised build costs and other costs and values which may have also varied as a result. In setting the CIL rates the council has taken account of the CIL Regulations and guidance and has not set rates on the margins of viability.

- 3.23 Following the adoption of CIL, the use of Section 106 will be scaled back in accordance with the Regulation 123 list. Further information on the proposed relationship between CIL and Section 106 is provided in the CIL Draft Charging Schedule Background Document. Current Section 106 negotiations seek contributions towards infrastructure which will in future be funded through CIL, and are therefore higher than the amount of Section 106 that would be sought post-CIL adoption on the same site.

Section 106 and CIL

- 3.24 Several respondents highlighted concern that CIL was less financially onerous on developers than Section 106 agreements, and that CIL will not meet the infrastructure demands of the new development within the emerging Local Plan.
- 3.25 A number of respondents noted that the current use of Section 106 agreements provides adequate provision for the infrastructure required. Specific reference was made to Section 106 being the most suitable means of securing education contributions.
- 3.26 It was stated in one representation that further information on the relationship between CIL and S106 was required.
- 3.27 One response (Blue Cedar Homes) cited the during the consultation period the Government has issued guidance set out in the National Planning Policy Guidance (NPPG) document, dated 28 November 2014, and that as such, this very recent guidance should be taken into account in the Council's CIL Charging Schedule and be added to the list of 'Exemptions'.

Comments

- 3.28 CIL is a fixed non-negotiable cost of development where as S106 agreements are often subject to viability assessments. The NPPF (para. 2051) requires that where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations. With consideration to the National Policy and Guidance the council has considered the most appropriate mechanisms available for securing developer contribution. Further details on the infrastructure delivery can be found within the Delivering Infrastructure Strategy.
- 3.29 Nationally from April 2015, the regulations restrict the use of pooled section 106 contributions towards items that may be funded via the levy. At that point, no more may be collected in respect of a specific infrastructure project or a type of infrastructure through a section 106 agreement, if five or more obligations for that project or type of infrastructure have already been entered into since 6 April 2010, and it is a type of infrastructure that is capable of being funded by the levy. The approach to CIL/S106 has been informed by an assessment of the most suitable mechanisms for securing developer

¹ National Planning Policy Framework (2012) 205.

contributions, further details of this assessment can be found in the Delivering Infrastructure Strategy².

- 3.30 The CIL Draft Charging Schedule will be examined alongside the Local Plan 2031 Part 1. The NPPG supports this approach and recognises that relevant local policy changes should be implemented at the same time that the charging schedule is introduced, and integrated as soon as practical into the relevant Local Plan.
- 3.31 For residential schemes, the application of CIL at the rates proposed is unlikely to be an overriding factor in determining whether or not a scheme is viable. When considered in context of total scheme costs, the proposed rates of CIL will account for a very modest proportion of costs (typically less than 5% of total development costs, ie no more than a developer's contingency). Some schemes would be unviable even if a zero CIL were adopted.
- 3.32 The council is aware of the Government issued guidance set out in the National Planning Policy Guidance (NPPG) document, dated 28 November 2014, with regard to affordable housing and pooled s106 thresholds. Further details on the implications of the change for CIL is outlined in the Draft Charging Schedule Background document.

Level of CIL rates

- 3.33 With regard to the proposed residential £85 CIL rate for Wantage, Grove and Faringdon, there was a view by a few respondents that the rate in these locations should be higher. It was suggested in one response that the rates should be increased to £100 in Wantage, Grove and Faringdon and to £140 for the rest of the district.
- 3.34 In their response Chilton Parish Council identified that by not levying a CIL on industrial/commercial/office development this unfairly reduces the funding towards necessary infrastructure and equates to a subsidy from residential development for infrastructure.
- 3.35 Several respondents highlighted concerns that CIL was less financially onerous on developers than Section 106 agreements, and that CIL will not meet the infrastructure demands of the new development within the emerging Local Plan.
- 3.36 It was suggested by one developer that a nil/zero rate should be applied to all strategic sites, an approach similar to other districts. Several other developers have queried the level of CIL that will be sought on sites where significant infrastructure is being delivered through Section 106.
- 3.37 It was suggested by Oxfordshire County Council and Blue Cedar Homes that Retirement/Sheltered accommodation within use Class C3 should be exempt from CIL

Comments

² Delivering Infrastructure Strategy, accessed as: www.whitehorsedc.gov.uk/localplan

- 3.38 The viability assessment has identified that there is evidence to support differentiated residential CIL rate based on geography. Sites in and adjacent to Faringdon, Grove, Wantage could support a CIL of between £85/m² and £100/m² with all other areas could support a CIL between £120/m² and £140/m². All strategic sites have been subject to individual viability assessments taking into account the Section 106 obligations that will be sought on site, and the viability assessment supports the rates proposed.
- 3.39 While the CIL Regulations and Guidance advise of the importance of not setting the CIL rates up to the margin of viability there is no prescribed discount or viability cushion that should be applied to CIL rates. However, as more authorities progress to CIL examination, Examiner's Reports provide additional insight. Of particular interest is the Examiner's Report³ for the Greater Norwich Development Partnership which highlights: "The need for a substantial 'cushion' is particularly important on Greenfield sites where, as the Harman advice notes⁴, prospective sellers are often making a once in a lifetime decision and are rarely distressed or forced sellers. Although there are no defined 'tests' to demonstrate the suitability of a viability cushion, CIL Examinations including the Greater Norwich Examination examined by Keith Holland, have identified guidance and good practice. The Greater Norwich Examination provides guidance that CIL rates which are less than 25% of residual value are an indication of the appropriateness of the rates. Additionally, it has been advised by our viability consultant that CIL rates which are less than 3% of Gross Development Value (GDV) are another indication of appropriateness.
- 3.40 Opportunities to maximise CIL income has been explored, including as suggested by a respondent, a district wide rate of £140 and Faringdon, Grove and Wantage rate of £100. While this option would result in the higher CIL income there are risks associated with setting rates with a reduced viability cushion and challenges demonstrating that the rates will put the delivery of the plan at risk. The higher rates would achieve approximately £91m over the plan period to 2031 as opposed to £78m with the rates as proposed. However, at the higher rates some sites would exceed the best practice upper limits of 25% of residual value and 3% of Gross Development Value (GDV).
- 3.41 In addition to a residential viability assessment, separate assessments of the viability of and non-residential development in the District have been undertaken, using different models that take into account different uses. In the current market business uses (including offices, industrial and distribution) were found not to be able to support a CIL in the short or medium term, this is not uncommon with many other charging authorities. Where appropriate such uses will contribute towards infrastructure through S106. There are many other types of uses which may get developed over the plan period, including agriculture, community use, surgeries, day nurseries, hospitals, cinemas, leisure centres, petrol stations etc. For the most part such uses do not in produce revenue which outweighs the costs at a level which would enable a

³ Planning Inspectorate report to the Greater Norwich Development Partnership – for Broadland District Council, Norwich City Council and South Norfolk Council.

⁴ Viability Testing Local Plans Advice for planning practitioners, Local Housing Delivery Group

CIL to be included whilst the schemes remain viable, this is because they are often not built to generate profit, but to facilitate a service. Such uses may warrant further analysis in a later CIL charging review.

- 3.42 The viability assessment has tested the extra-care and retirement sectors separately and found that extra-care housing (use class C2/C2A) cannot support a CIL charge. However, sheltered housing, which falls within the C3 category, was found to be viable with the current CIL rates. The Council has excluded extra-care housing from the levy.

Instalments Policy, Exemptions and Exceptional Relief

- 3.43 The majority of respondents submitting representations in relation to the draft Instalment Policy supported and welcomed its inclusion with most respondents claiming this to be a critical factor in terms of viability of development when CIL is imposed. One respondent raised concerns that the trigger points were too extended, and favourable to developers at the expense of the local community. Conversely, it was reported by some developers that the instalment trigger points do not account for phased development and will result negatively on development and should be extended (Gladman Development, Ptarmigan Land).
- 3.44 Alternative instalment policies were suggested by both developers (Gladman Development, Ptarmigan Land) and by Wantage and Grove Campaign Group.
- 3.45 The application of an exceptional relief policy was considered to be appropriate by several respondents, including the NFU for agricultural residential development, English Heritage and Asda Ltd.

Comments

- 3.46 The CIL Regulations 2014 treat each phase of a phased planning permission as a separate chargeable development. The Instalment Policy has been updated to clarify how phasing will be dealt with, and provide greater clarity for developers. The proposed Instalment Policy is considered appropriate. The council will monitor the effectiveness of the instalment policy and we will review this over time, as set out in the CIL Regulations revisions to the instalment policy will be subject to consultation.
- 3.47 In proposing the CIL rates, we have had regard to the CIL Viability Study, which has examined the potential to set a CIL rate whilst still delivering site specific mitigation measures (under section 106 and section 278), and meeting Local Plan requirements for affordable housing. This evidence, together with the limitations for CIL relief set out in the CIL regulations, has led to the conclusion that it is not necessary to introduce an exceptional circumstances relief policy at this time, however the impact of the introduction of CIL and the potential benefits or otherwise of introducing an Exceptional Circumstances Relief Policy should be kept under review.

Other issues

- 3.48 In their response Chilton Parish Council stated that they do agree with the council's interpretation of the CIL regulations that use it as lever to force on parishes a Neighbourhood Plan through increasing its "meaningful proportion" from 15% to 25%. They believe that all parishes should receive the same

25% share of revenue. For the same reason, the £100/dwelling cap was considered unacceptable.

- 3.49 Asda Stores Ltd in its response raises concerns that there will be EU State Aid issues arising out of the setting of differential rates for different types of commercial entity within the same use class. Specifically that introducing such differential rates confers a selective economic advantage on certain retailers depending on the size of shop they operate out of, or their type of business.
- 3.50 It was suggested by two respondents that the council should adopt a flat levy rate for comparable sectors of the economy/use classes. One of the respondents stated that the total cost of infrastructure should be taken and applied across all development in the form of a rate.
- 3.51 One respondent suggested that further definitions, in particular of self-building, residential annexes and lawful use, should be included in the charging schedule.
- 3.52 It was suggested by Abingdon Town Council that the neighbourhood/localised proportion of CIL should go to the town or parish council where the will be pressures on services and facilities not the parish where development occurs.
- 3.53 Abingdon Town Council request a parish boundary review prior to development and it was noted by Stevenson Parish Council that the material was not easily understood.

Comments

- 3.54 The council will administer CIL in accordance with the CIL Regulations 2010 (as amended) and will use the definitions as set out within, or in future revisions. The allocation of CIL to Town and Parishes councils, as outlined in the note prepared for the November 2014 Town and Parish Forum, is in accordance with the CIL Regulations 2010 (as amended 2013) 59A – Duty to Pass CIL to Local Councils⁵. The council is not using CIL as a means of encouraging or dissuading the preparation of a neighbourhood plan.
- 3.55 The CIL Regulations are clear that where there are viability differences, differential rates can be applied. There are no state aid implications for charging different retail uses at different rates, or for charging different rates in different zones, as long as the differences are based on robust and credible viability evidence in line with the requirements of the CIL regulations.
- 3.56 The Charging Authority is required by the CIL Regulations to derive rates based on viability evidence, it is therefore considered that a flat rate applied across all uses would not be in accordance with the CIL Regulations.

⁵ CIL Regulations 2010 (as amended 2013) Regulation 59A Duty to pass CIL to local councils, accessed at: <http://www.legislation.gov.uk/uksi/2013/982/regulation/8/made>

Appendix 1: List of respondents

#	Respondent	Comment ID
1	Ms Gene Webb (Consultee ID: 729356)	CILP8
2	Mrs Vivienne Illingworth (Consultee ID: 868096)	CILP9
3	Mrs Morris Chilton Parish Council (Consultee ID: 730242)	CILP10
4	Ms Amanda Jacobs Oxfordshire County Council (Consultee ID: 729057)	CLIP12
5	ASDA stores Ltd (Consultee ID: 865740) c/o Mr Rory Bennett Thomas Eggar LLP (Consultee ID: 865745)	CILP13
6	Mr Chris Henderson (Consultee ID: 872084)	CILP14
7	Dr David Illingworth (Consultee ID: 821371)	CILP18
8	Mrs Angela Einon Steventon Parish Council (Consultee ID: 730283)	CILP19
9	Mrs Elizabeth Jenkins Letcombe Regis Parish Council (Consultee ID: 730266)	CILP15
10	Ellie Henderson Woodland Trust (Consultee ID: 725048)	CILP26
11	Mr Tom Ormesher NFU South East (Consultee ID: 850741)	CILP27
12	Mr Robert Gaskell Gladman Developments (Consultee ID: 841391) c/o Mr Richard Heathcote GL Hearn Ltd (Consultee ID: 873714)	CILP35
13	Mr John Attree (Consultee ID: 823359)	CILP34
14	Mr Craig Neilson Ptarmigan Land (Consultee ID: 856306) c/o Mr Robin Shepherd (Consultee ID: 873607)	CILP33
15	Ms Tina Brock Cumnor Parish Council (Consultee ID: 730245)	CILP32

16	Mr Simon Tofts Blue Cedar Homes (Consultee ID: 783140)	CILP31
17	Mrs Taylor Harwell Parish Council (Consultee ID: 730260)	CILP43
18	Berks, Bucks and Oxon Wildlife Trust (BBOWT) (Consultee ID: 725023)	CILP44
19	John Martin (Consultee ID: 758920)	CILP45
20	Ms Julia Evans East Challow Parish Council (Consultee ID: 756629)	CILP30
21	HallamLand Management (Didcot) (Consultee ID: 757670) c/o Mr Nick Laister RPS Planning (Consultee ID: 724475)	CILP47
22	Mr Hugh Rees Wantage Deanery (Oxford Diocese) (Consultee ID: 782835)	CILP29
23	McCarthy and Stone Retirement Lifestyles Ltd (Consultee ID: 751493) c/o Mr Ziyad Thomas The Planning Bureau Ltd (Consultee ID: 751488)	CILP28
24	Mr Clive Manvell (Consultee ID: 829424)	CILP24
25	Mrs Philippa Manvell (Consultee ID: 829463)	CILP23
26	Mr Nigel Warner Abingdon Town Council (Consultee ID: 730229)	CILP22
27	Marcham Parish Council Clerk Marcham Parish Council (Consultee ID: 769602)	CILP21
28	Mr Ross Anthony Planning Adviser The Theatres Trust (Consultee ID: 856633)	CILP20
29	Radley Parish Council (Consultee ID: 872105) c/o Mrs Jane Dymock Parish Clerk Radley Parish Council (Consultee ID: 872103)	CILP17
30	Keith and Margaret Eddey (Consultee ID: 831878)	CILP16
31	Harwell Oxford Campus Partnership (Consultee ID: 872225) c/o Ms Charlotte Mitchell Planner Quod (Consultee ID: 872215)	CILP15

32	Mr Alistair Buckley (Consultee ID: 756490)	CILP7
33	Mrs Desiree Correia (Consultee ID: 869840)	CILP6
34	Mr Martin Small Historic Environment Planning English Heritage (Consultee ID: 634166)	CILP5
35	Piotr Behnke Natural England (Consultee ID: 864657)	CILP4
36	Maria Dopazo Planning Officer (Consultee ID: 869662)	CILP3
37	Mr A Greatbanks (Consultee ID: 826276)	CILP1
38	Graftongate and ClowesDevelopmentsLtd (Consultee ID: 831547) c/o Mr Gary Lees Pegasus Group (Consultee ID: 831550)	CILP39
39	Commercial Estates Group (CEG) (Consultee ID: 852837) c/o Mr Gillespie Carter Jonas LLP (Consultee ID: 724293)	CILP38
40	Radley College (Consultee ID: 741313) c/o Mr Gillespie Carter Jonas LLP (Consultee ID: 724293)	CILP37
41	Julie Maberley Campaign Manager Wantage and Grove Campaign Group (Consultee ID: 827932)	CILP36
42	David Wilson Homes Southern (Consultee ID: 741327) c/o Ms Donna Palmer Boyer Planning Ltd (Consultee ID: 873720)	CILP40
43	Ms Julie Evans East Hendred Parish Council (Consultee ID: 730250)	CILP30
44	Councillor Judy Roberts Councillor Vale of White Horse District Council (Consultee ID: 730216)	CILP35
45	National Housebuilder and Landowner Consortium (Consultee ID: 866553) c/o Ms Elizabeth Foulkes Savills (Consultee ID: 866557)	CILP46

46	Mr Jack Moeran Environment Agency (Consultee ID: 725115)	CILP50
47	Macktaggart and Mickel and Mr and Mrs Carlisle (Consultee IDs: 829895 & 831681) c/o Mr Nathan McLoughlin McLoughlin Planning (Consultee ID: 737353)	CILP51
48	Mr Peter Evens Hinton Waldritc Parish Council (Consultee ID: 755329)	CILP52
49	Welbeck Strategic Land (Consultee ID: 737200) c/o Mr Nathan McLoughlin (Consultee ID: 737353)	CILP55
50	Daniel Scharf MA MRTPI (Consultee ID: 756808)	CILP57
51	Paul Appleby (Consultee ID: 758000)	CILP58
52	Cherwell District Council (Consultee ID: 725166)	CILP59
53	Fraser Old (Consultee ID: 749047)	CILP60
54	Faringdon Town Council (Consultee ID: 730252)	CILP61

Appendix 2: Consultation responses

- Available on request -