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Dear Trustees of Witney Town Charity,

**22/03356/FUL: Spitfire Homes application to develop 80 residential dwellings on land east of Wroslyn Road (Chapel Field) in Freeland**

As a statutory consultee, Freeland Parish Council has recently submitted a comprehensive objection to the above planning application on a field in Freeland owned by Witney Town Charity. The points raised in the attached objection speak for themselves – this proposal is completely inappropriate for the village and the location, and would result in considerable harm being done to the biodiversity, landscape and character of the village, and the quality of life of its residents.

However, the intention of this letter is to primarily raise concerns about the conduct of Spitfire Homes as your development partner in this matter, and urge an alternative approach.

The application was prepared with scant consultation, and sought no standard pre-application advice from WODC. Had this been done, we believe the manifest deficiencies of this opportunistic and speculative proposal would have been made clear from the start. Even the promise of the village shop, which should be a huge benefit to the village, is badly conceived and offers little for residents because it is offered on a commercial basis when feasibility studies have already established that only a volunteer-run non-profit enterprise would be viable.

It is obvious the application was submitted hurriedly and opportunistically following an appeal against WODC's refusal of an adjacent site (which was later dismissed), and as a result, is highly speculative, ill-considered, badly evidenced, incongruous and poorly designed. While Witney Town Charity is highly regarded in this area for its work on improving the lives of those most in need, we fear this application risks undermining that reputation in the eyes of Freeland's residents, 180 of whom have objected independently to the application.

We fully accept the current shortfall in WODC's housing land supply, the requirement for a better affordable and commercially-priced housing supply to meet local needs, and the

benefits that some new families would bring to the pub, garden centre, village school and overall village vitality – but this is not the proposal to achieve that, and it is disappointing that Spitfire Homes has sought to capitalise on these issues. If Spitfire Homes had engaged more meaningfully throughout this application and taken the time to discuss the design for this proposed site, we might have – together – achieved something of which we could all be proud: a development that meets the needs of the village, provides a profitable venture for the developer, and enables Witney Town Charity to monetise its land asset.

Because of the situation we now find ourselves in, we have two requests.

Firstly, you will be aware that charity should be no stranger to scrutiny and accountability. Donors, stakeholders, and service users alike want to know that a charity is operating in their best interests and acting responsibly and in line with their charitable objectives. A 2022 report from the Charity Commission found that while public trust in the charity sector is higher than in most other parts of society, there remains a “stubbornly persistent scepticism regarding how charities use their money and how they behave”. This is where Environmental, Social, and Governance (ESG) reporting comes in, which is now a common requirement for the investors and boards of private and public companies.

It is the environment and social sustainability of this proposal in particular which concerns us, and we would ask whether, in the option Spitfire Homes holds for the proposed site, there are any stipulations about conduct, or acting in keeping with the charity’s aims, objectives and charitable status. If so, and these have been breached, we ask whether Witney Town Charity would consider withdrawing the option from Spitfire Homes and engaging in discussions directly with the village over how the land can be developed for the optimum benefit of all? Failing that, could Spitfire Homes be instructed to modify its conduct to take a more consultative approach from this point on, assuming the application is – as we hope – refused?

Secondly, if the above are not possibilities and the application is indeed refused, we urge you to employ all means to dissuade Spitfire Homes from pursuing a damaging and distressing appeal. The village has only just finished participating in one appeal and while it succeeded in supporting WODC in having the appeal dismissed, the experience was taxing, emotionally punitive for all, and costly for the village. Does Witney Town Charity want to inflict this experience again on Freeland? Instead, we have the opportunity to engage meaningfully with Spitfire Homes to develop a more sustainable and mutually beneficial proposal for the ‘second go’ resubmission.

We remain open to discussing a mutually beneficial development that could be supported, but will continue to vigorously fight the development as currently proposed.

Yours sincerely

Roger Faulkner

Chairman Freeland Parish Council