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URGENT BUSINESS AND SUPPLEMENTARY INFORMATION

Executive

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Agenda Item Number	Page	Title	Officer Responsible	Reason Not Included with Original Agenda
7.	(Pages 1 - 18)	Submission of the Partial Review of the Cherwell Local Plan 2011-2031- Oxford's Unmet Housing Needs Appendix 1 - Additional Representation Summaries	Deputy Manager – Planning Policy and Growth Strategy	Due to the size of this document it has been published separately

If you need any further information about the meeting please contact Natasha Clark, Democratic and Elections natasha.clark@cherwellandsouthnorthants.gov.uk, 01295 221589

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Appendix 1

Additional Representation Summaries

Begbroke Parish Council

The main points of objection from Begbroke Parish Council are as follows:

- the plan is unsound and unjustified;
- vested interests have shaped the vision;
- previous consultation responses have been ignored;
- the Plan is not justified as Oxford's housing need will fall by over 40% and Cherwell's by 33% under new Government figures;
- student numbers should be excluded from housing need;
- the reduction in the area of Green Belt does not reflect the real change in affected areas such as Begbroke, Yarnton and Kidlington and the percentage change in individual parishes;
- the environment should be protected;
- sites PR9 (west of Yarnton), PR8 (east of the A44/Begbroke) and PR3e (removal of land from the Green Belt to the north, east & west of Begbroke Science Park) would collectively have a devastating effect on the Green Belt;
- concerned that the Green Belt would not be sustained;
- concerned that land adjacent to Begbroke Lane would be proposed for future development rather than than being a permanent local nature reserve;
- there is no guarantee of future Green Belt expansion;
- concerned that the provision of facilities for outdoor sport is to build an exceptional development case;
- the need for affordable housing in Oxford is exaggerated;
- there are no exceptional circumstances for development in the Green Belt;
- 'Brexit' will lower the demand for housing;
- no guarantee that the housing would be for the longer term benefit of Oxford;
- people from outside Oxfordshire could buy the properties / commute to London
- many people would not be able to afford affordable housing at 80% of market rents;
- Oxford is not doing enough to build more houses e.g.. increasing densities, compulsory purchase. It has dismissed sites too easily. Sites are available (examples given);
- Oxford's pledges to deliver affordable homes might reduce the number of homes needed;
- Oxford's business activity should not be encouraged without the ability to house more people;
- there are other suitable sites including sites within Oxford and its part of the Green Belt which is being preserved while Cherwell's is built on and sites nearer to Oxford;
- housing in Oxford will not be sustainable nor affordable due to its high cost;
- empty homes are available;
- there are only some limited opportunities for small developments in the Begbroke area (examples given);
- Begbroke Science Park, London-Oxford Airport and the Langford Lane area create housing need for Cherwell not Oxford;

- people travel from further afield in Oxfordshire to work in Oxford including Banbury and Bicester;
- question the 'place shaping potential' of the area and what this means;
- developing meadows and agricultural land would not be an improvement nor is an exceptional reason for building in the Green Belt;
- development would have an adverse effect on the Green Belt;
- the suggested 'cautious' approach at Woodstock due to international/national heritage assets is not a valid reason not to build around the town. The palace views would not be affected;
- exacerbation of traffic problems / congestion / air pollution in the north Oxford/A44/A4260 corridor;
- question how transport infrastructure would be funded;
- question what is meant by the strengthening of Kidlington village centre;
- there are too many buses running at the same time in Kidlington. Journey times are poor - better transport policy is needed;
- the public open space / green infrastructure / recreation case is not justified - there is already access;
- a 'joined-up vision' for the whole area is contrary to Green Belt policy;
- the Plan would result in urban sprawl and the merging / coalescence of three villages with Oxford leading to their destruction and loss of identity;
- section 106 contributions would not be sufficient to meet the huge infrastructure costs;
- the proposals do not meet the NPPF's tests for appropriate development in the Green Belt;
- national policy attaches great importance to Green Belts;
- concerned about the impact on flooding including in the Rowel Brook / Begbroke area;
- closure of Sandy Lane would have a major impact on Begbroke and local roads and could conflict with the plan to reduce traffic on the A4260;
- the proposed Park and Ride on Campsfield Road would exacerbate problems;
- diverting traffic from the A4260 to the A44 would create problems crossing the A44, worsen existing congestion/traffic problems/delays. The housing would exacerbate this;
- the permitted Oxford Technology Park, bus lanes and bus stops would lead to further queues / delays / impacts in the Langford Lane area;
- Commuter routes into north Oxford (Sunderland Avenue/Banbury Road/Woodstock Road and parts of the A40) have traffic issues despite recent highway improvements;
- there are wider traffic issues and other planned growth to consider;
- the discounting of areas of search (options C-I) further away from Oxford is unfounded;
- Begbroke Science Park would become over-developed;
- question the need for the expansion of the Science Park and what is meant by 'land reserved';
- the Science Park and its access road should not be used to justify the developments;
- Begbroke Lane should not be shown as a strategic cycle route;
- question the achievability and funding of a bus lane/rapid transit route along the A44;
- loss of wildlife habitat;
- loss of views;
- increased pressure on existing services;

- the local centre would be distant from Begbroke;
- pressure on the Oxford Canal;
- the Plan would bring no benefits for Begbroke;
- further Green Belt erosion would occur in the future.

Gosford and Water Eaton Parish Council

The main points of objection from Gosford and Water Eaton Parish Council are as follows:

- the Plan and supporting documents are not sound;
- the 4400 figure is a working assumption to be tested. It is not a given and not justified;
- concerned about the impact of 32 per cent (1,410) of the homes being in Gosford and Water Eaton Parish with 676 existing dwellings in the Parish (208% increase);
- impact needs to be fully tested – on existing communities, the environment, transport infrastructure and Kidlington centre. The impacts would be substantial;
- 4400 is not the true need and should be continually reviewed in light of Oxford's ability to accommodate its own needs which will change over time and affect what is provided within Gosford and Water Eaton Parish;
- housing need should be based on up to date economic forecasting;
- Brexit will lower housing need;
- the vision gives insufficient consideration to the impact of the proposals on existing communities and the environment;
- the needs of the existing villages need to be taken into account;
- existing services and infrastructure are under strain (e.g.. education, health, transport, parking and water supply);
- at peak times, the Kidlington roundabout is very congested making travelling into and out of Oxford very difficult;
- committed growth in the district is making congestion worse and would be exacerbated by an additional 4400 homes;
- land required to provide additional transport infrastructure would lead to further development and urbanisation and impact on Green Belt and green spaces;
- difficult to see how new development on the scale proposed could "enhance and conserve the natural environment";
- 100 hectares / 12% of the Green Belt in the parish would be removed and the narrowest gap between Gosford and Water Eaton, Kidlington and Oxford would be significantly eroded;
- welcome the transport improvements proposed but not convinced that the negative effects on the road network can be adequately mitigated;
- insufficient evidence that transport and other infrastructure improvements can be delivered / funded;
- there is insufficient capacity at the Oxford Park and Rides;
- additional parking demand would affect local areas;
- would be increased traffic through villages to get to Oxford which would have a direct impact on Gosford and Water Eaton. Existing congestion and delays would be made worse;
- concerned about the impact of traffic on Kidlington centre;
- concern that there would not be the space for bus lanes;
- additional buses closer to dwellings would exacerbate problems of vibration;

- would be substantial loss of countryside;
- would be increased levels of pollution / adverse impact on air quality and Air Quality Management Areas;
- greater impact on recreational facilities;
- greater impact on the landscape, wildlife and historic environment;
- spatial strategy is not the most appropriate;
- not convinced that the proposed level of development could be delivered with the necessary transport and other infrastructure without detrimental impacts;
- development should not go ahead until critical infrastructure is in place (especially community & health);
- inconsistency with adopted Local Plan policies - notably Policy ESD 13 (landscape). ESD15 (built and historic environment);
- the scale of growth proposed at 4400 dwellings is too high and needs to be reduced to better achieve sustainable development;
- if development has to be accepted then growth should be restricted to no more than 25% of the existing number of dwellings within the parish;
- do not consider that Green Belt sites in the parish should be released;
- concerned how affordable housing would be defined / secured so that it is truly affordable;
- the Plan should ensure that new affordable housing is equally available to residents in Gosford and Water Eaton;
- it is important that affordable housing is delivered in accordance with the policy and not watered down as a result of developer pressure;
- appropriate mechanisms need to be in place to secure the affordable housing in perpetuity;
- how provision would be made for key workers is unclear;
- an appropriate mix of market housing is needed not just executive homes;
- the Plan would result in the urbanisation of Gosford and Water Eaton Parish;
- the proposed site allocations were identified in the Green Belt study as being “High” or “Moderate High” in terms of harm to the Green Belt;
- releasing land would lead to the coalescence or near coalescence of Kidlington, Gosford and Water Eaton and Oxford;
- the remaining Green Belt gap is heavily dominated by transport infrastructure (railways and major roads) and therefore does very little to preserve any real sense of openness;
- release of land would make it much more difficult to retain any real sense of separate identity for Gosford and Water Eaton and for Kidlington;
- the release of Green Belt land conflicts with national policy, guidance and the purposes of the Green Belt. It would lead to further sprawl, urbanisation, settlements merging, encroachment into countryside and damage to the setting of Oxford through development within the Cherwell Valley;
- inconsistency between CDC's and Oxford's approach to the review of the Green Belt despite using the same consultants and the same methodology; Oxford is ruling out sites where there would be 'high' or 'moderate high harm' to the Green Belt. There is therefore doubt about the housing potential of Oxford and the appropriateness of the proposals for Gosford and Water Eaton;
- all references to land east of Oxford Road as being in the 'north Oxford' area should be credited to Gosford and Water Eaton Parish;
- the impact of site PR6a on the Green Belt would be compounded by the release of the Water Eaton Park and Ride;
- there would be no readily definable Green Belt boundary to the east of site PR6a making it difficult to contain development;

- the proposed public open space/wildlife habitats needs to be protected from future development;
- Policy PR6a should be deleted;
- object to development of the golf course (PR6b) - a valued, historic leisure facility;
- with other sites, site PR6b would result in significant erosion of the Green Belt
- many protected trees on site PR6b could be impacted;
- note the proposed lower density of development to protect trees but, due to this, sceptical about the delivery of 50% affordable housing;
- object to the replacement site for the golf course (PR6c). The viability and practicality of moving the golf course (PR6c) is questioned given the considerable expense and disruption;
- not clear how site PR6c would be accessed / the constraints for a Development Brief
- if residential development does need to go ahead, site PR6c is suggested as an alternative due to links to Northern Gateway (Oxford), existing road infrastructure and support for the Stratfield Brake recreational facility;
- opposed to the development of site PR7a (south east Kidlington) which would weaken the Green Belt gap and lead to traffic problems. There is no scope for extra traffic on Water Eaton Lane;
- cemetery provision should be made on site PR7a for future development in Kidlington and Gosford & Water Eaton and could be reserved in the form of allotments. Additional land for allotments should be provided;
- concerns about managing surface water run-off the area of site PR7a to avoid flooding which already occurs in some places;
- the recreational open space on site PR7a should however remain open in perpetuity;
- Policy PR11 does not provide reassurance that infrastructure will actually be delivered
- concerned about the prospect of unallocated sites coming forward under Policy PR12b;
- question how local community support would be demonstrated under Policy PR12b;
- Policy PR12b should not allow for any additional release of Green Belt land;
- concerned that the Sustainability Appraisal understates the negative effects of development;
- agree with commentary in the Transport Assessment (TA) about existing issues but state that the TA should be reviewed in view of the uncertainties about infrastructure delivery.

Kidlington Parish Council

The main points of objection raised by Kidlington Parish Council are as follows:

- Oxford's local plan needs to be completed to determine the level of housing need;
- both Oxford and Cherwell (CDC) plans will be subject to new national guidance (following the Government consultation document *'Planning for the Right Homes in the Right Places*). The Strategic Housing Market Assessment may need to be updated to reflect the new guidance. It is premature to make decisions on the Partial Review;

- Oxford & CDC have significantly over-estimated the level of new housing required;
- Oxford is not giving sufficient priority to accommodating additional housing;
- the Oxfordshire Growth Board's apportionment is a working figure to be tested in local plans. The apportionment to CDC is not reasonable in scale;
- need to protect the separation of settlements close to the Oxford boundary;
- unacceptable harm to the integrity, functions, scale of the Green Belt. The Green Belt study shows that all of the proposed sites include land of moderate/high importance
- Oxford City is rejecting 'high' grades of Green Belt in considering options for its new local plan;
- the development of Green Belt land of 'high' importance is unacceptable in principle;
- 'exceptional circumstances' for development in the Green Belt have not been demonstrated;
- inconsistencies between the CDC & Oxford Green Belt studies;
- delete references to removal of the following sites from the Green Belt PR3c (land south of the A34 and west of the railway), PR3d (Oxford Parkway and Water Eaton Park and Ride), PR6a (east of Oxford Road), PR6b (west of Oxford Road), PR8 (east of the A44) from the Green Belt;
- removal of land at PR3c might make the site capable of development in the future bringing Oxford unacceptably closer to Kidlington;
- removal of Green Belt designation for Water Eaton Park and Ride could pave the way for additional buildings, further weakening the Oxford/Kidlington gap;
- unacceptable traffic congestion and worsening of air quality;
- unacceptable damage to the individual character of local settlements;
- unacceptable loss of valued open land;
- the Plan does not represent sustainable development;
- conflict with adopted Local Plan policies;
- detrimental effects on community & the environment;
- if development has to be accepted, the quantum should be reduced;
- needs to be more account taken of the Kidlington Masterplan in Policy PR1;
- Policy PR1 needs to refer to adequate infrastructure provision;
- development should not procced until off-site infrastructure is provided;
- 50% affordable housing requirements should also apply to any unallocated sites that come forward (Policy PR12b);
- need clarity on how the housing allocation of affordable homes will work;
- need more certainty on the delivery of affordable housing for CDC residents employed in Oxford;
- concern about potential displacements of people on CDC housing register by people from the Oxford housing register especially by University key workers to the detriment of other key workers in wider community services;
- Policy PR4a should be extended to require substantial investment in off-site infrastructure;
- Policy PR4b (Kidlington Centre) would not achieve any of the investment necessary and needs to extend beyond transport and movement issues;
- need to study the impact of the Plan on Kidlington centre;
- developments should contribute to enhancing movement in Kidlington centre;
- object to Policies PR6a and PR6b (East & West of Oxford Road) due to significant narrowing of the important open countryside gap between Oxford & Kidlington;

- agricultural land east of Oxford Road is an important part of the setting of Oxford;
- the golf course to the west of Oxford Road (PR6b) is long established and well treed requiring lower density development and meaning inefficient use of land and potential viability issues. Net benefits do not outweigh harm;
- loss of golf course unlikely to be offset by new course at Frieze Farm (PR6c);
- Policy PR6c conflicts with national Green Belt and recreation policy;
- delivery & deliverability of a golf course at Frieze Farm is questioned;
- Policy PR7a (south-east of Kidlington) should require a footbridge;
- Policies PR7a and PR7b (Stratfield Farm) should contribute to improved access to Stratfield Brake wildlife site - a new spur from the roundabout;
- Policy PR8 (east of A44, Begbroke) would have a major adverse impact on the identity of Kidlington, eradicating open landscape character and the setting of Begbroke and Kidlington;
- Policy PR8 would result in the Green Belt being meaningless in this area;
- Policy PR8's separation distance (Kidlington/Begbroke) would not prevent intervisibility and perception of coalescence;
- site PR8 would not be well integrated with Kidlington or be a genuinely freestanding village;
- PR8's local centre would compete with / affect Kidlington village centre;
- concerned about the closure of Sandy Lane and loss of a valued link from Kidlington to Begbroke. More detailed assessment needed;
- infrastructure schedule lacks information on programmed delivery;
- uncertain whether higher levels of affordable housing can be viably delivered;
- Concerned about unallocated sites from the Housing & Economic Land Availability Assessment (HELAA) coming forward under Policy PR12b;
- there is no need for the contingency provided by Policy PR12b as the examination would confirm the deliverability of the Plan's sites;
- concerned as to how demonstrable support of the local community under Policy PR12b would be defined. Should include reference to the support of the affected Parish Council.

Woodstock Town Council

The main points of objection raised by Woodstock Town Council are as follows:

- housing allocation plans published by Cherwell and West Oxfordshire District Councils would add a further 1080 houses on the south-east, east and northern edges of the town, all on prominent gateway sites;
- substantial impact on the historic town (e.g.. traffic, infrastructure and services);
- *Heritage Impact Review* provided - the proposed developments either would cause or have the potential to cause moderate impacts individually on Woodstock and its heritage assets. In a few cases impacts would be moderate to high;
- The cumulative impact (including West Oxfordshire's proposals or combinations of them) would be moderate to high. This amounts to substantial harm as defined in the National Planning Policy Framework (para's. 132-3). Specific points of concern include:
  - any one of the sites, if developed as planned, would represent a substantial increase on current housing provision in Woodstock, and

would involve the permanent loss of green space and agricultural land outside of the current settlement limits. This would harm the character and heritage significance of the town;
  - the cumulative harm of any more than one site being developed would be exponentially greater than any individual impact;
  - the combined effects of CDC site PR10 and the adjacent site within West Oxfordshire are a particular concern, as they would represent a very substantial development extending well beyond the current limits of the town. This would represent the loss of a crucial buffer zone between Woodstock and London Oxford Airport. The effect would be a virtual merger with Kidlington;
- housing development would create a new hard edge instead of green space and will be particularly damaging on the A44 approaches;
- the fields either contain known archaeological sites or have such sites in their immediate vicinity. Further important remains may exist within the fields and this has not been addressed adequately;
- Blenheim Roman Villa, a Scheduled Monument has been excluded from the PR10 development area, but new housing within the field would harm its setting. It is known that associated Roman remains extend well beyond the Scheduled area into other parts of the field including within the area currently identified for development;
- there does not appear to have been any coordination between the two district councils over their development proposals, thereby exacerbating cumulative impacts;
- a *Traffic Congestion and Local Plan Policy Proposals Review/Assessment* is provided;
- the proposals are not compliant / do not demonstrate compliance with national or local policy;
- the Plan does not adopt a sustainable approach;
- there would be extreme congestion on the A40, A44, A4095 & A4260;
- local highway links via the A44/A4095/A4260 interchanges close to and including Woodstock are already at 85%-95% of full operational capacity at peak times;
- CDC has not provided any up-to-date evidence which examines the impact on residents and businesses using the A44 transport corridor;
- additional traffic likely to be generated has not been factored into the plan;
- based on trip rate traffic assessments, the existing highway infrastructure cannot be expected to cope with any significant new development without substantial expenditure;
- the development would not be located close to town centres or efficient public transport facilities and would be reliant on the private car;
- the development would not help reduce emissions and would further degenerate air quality;
- the location of the proposed developments would not reduce the number of car trips as there is no promotion of sustainable modes of travel even though public transport services in this area are particularly good;
- there is no clearly defined timetable or delivery mechanism for a sustainable transport solution. Provision needs to be made with realistic policies;
- the predicted modal shift of around 15% (Connecting Oxfordshire) is optimistic and unsubstantiated;
- the policy approach of CDC, WODC and the County Council is not joined-up

- no real consideration has been given to the effects of the West Oxfordshire Local Plan;
- there is a significant funding gap to deliver required infrastructure;
- a cohesive, well-connected approach is needed;
- there are conflicts between the Partial Review and the adopted Local Plan 2011-2031;
- the proposed new methodology for assessing housing needs in the 'Right Homes in the Right Places' Government consultation document would lower housing need and make the inclusion of site PR10 unnecessary;
- the proposed site for 300 homes adjacent to PR10 within West Oxfordshire may include ransom strips affecting the viability of the Cherwell site;
- Policy PR10 would result in an isolated commuter village;
- the delivery of 50% affordable housing cannot be guaranteed;
- site PR10's detachment means that it would be less practicable for unemployed or lower income people due to the lack of public transport and the cost of travel;
- site PR10 would result in at least a further 1,025 people in addition to Woodstock's 2011 population of 3,100. The possible 670 homes from the new West Oxfordshire plan would increase this to 2,700 additional people (an 83.7% increase);
- education and health provision in Woodstock is not adequate to cope with the population increase;
- traffic congestion and lack of parking would discourage spending in Woodstock and trade would be displaced to other centres;
- site PR10 is not within reasonable walking distance of the centre of Woodstock;
- site PR10's situation in open countryside and in proximity to Blenheim Palace World Heritage Site, Blenheim Villa Scheduled Ancient Monument and Woodstock Conservation Area should have been considered;
- Policy PR10's proposals for woodland/wildlife conflict with bird/wildlife restrictions associated with London-Oxford Airport;
- part of the development area would be affected by noise from the operation of the airport;
- there is no clear indication of how traffic congestion, associated pressure on the built and natural environments, air pollution (including Air Quality Management Areas), including from growth committed in the adopted Cherwell Local Plan, would be managed;
- there are questions about the capacity of the existing foul drainage network as evidenced by Environment Agency comments on planning applications for site PR10 and the adjoining site in West Oxfordshire;
- with regard to the Sustainability Appraisal (SA):
  - no [permission] for the adjacent site in West Oxfordshire has been given and so it cannot be relied upon;
  - site PR10 would not integrate with the existing urban area;
  - the site does not score highly against many of the SA's objectives;
- the plan is not cohesive and fails to recognise in any detail/substance the need to have regard to sustainable travel measures;
- concerned that there would be no separate bus lanes, thereby causing delay and discouragement of use;
- the plan provides no indication of what the traffic congestion levels are at present;
- the plan does not clearly demonstrate potential cycle accessibility;

- sustainable transport relief measures are not clearly identified;
- measures for those with mobility impairments are not clearly defined.

Begbroke and Yarnton Green Belt Campaign (BYG)

The main points of objection raised by the Begbroke and Yarnton Green Belt Campaign are:

- the Plan is not sound and based on an unlawful process of plan preparation
- concern that the Council's consultation did not comply with statutory requirements;
- insufficient time to comment in view of the number of documents;
- poor timing of the consultation over the summer holiday season;
- Important documents missing from the evidence base including a Housing and Economic Land Availability Assessment (HELAA) and appendices to the A44/A4260 Corridor Study (affecting their inclusion in the Transport Assessment);
- no proper justification for altering Green Belt boundaries;
- object to removal of sites PR8 (east of A44) and PR9 (west of Yarnton) from the Green Belt due to impact on villages and villagers;
- object to removal of sites PR6a (east of Oxford Road), PR6b (west of Oxford Road), PR7a (south east Kidlington) and PR7b (Stratfield Farm) from the Green Belt due to the importance of those sites in maintaining the gap between Begbroke, Yarnton and Kidlington to Oxford;
- object to site PR10 (south east of Woodstock) due to the impact on the A44 corridor;
- believe that the Sustainability Appraisal (SA) was published before the Transport Assessment and cannot have taken into account its results;
- the SA fails to report the adverse traffic congestion impact around Begbroke and Yarnton;
- transport evidence base and associated environmental assessment work is fundamentally unsound (a critique of the Transport Assessment is attached);
- the 'exceptional circumstances' for release of the Green Belt are 'general planning concepts' and therefore contrary to case law (cited);
- the necessary 'high bar' for the alteration of Green Belt boundaries - in respect of the quantum and quality of evidence – gathered through technical analysis and consultation – has not been met;
- the Plan is based on insufficient evidence to justify the extent and location of Green Belt release proposed;
- every unit of harm to the Green Belt must be justified through consultation and technical analysis and must be compared and contrasted to alternatives involving different and potentially less severe impacts;
- there has been insufficient consideration of reasonable alternatives;
- the rationale behind the housing figures is flawed;
- the SHMA is 'long in the tooth' being based on 2011-based Household Projections and 2012 Mid-Year Population Estimates. This starting point has a 'shelf life' of just twelve months;
- given the Government's publication of a draft uniform methodology for calculating housing need and the forthcoming publication of Oxford's own housing figures, it is premature for the Council to be proceeding;

- for Oxford, the proposed methodology leads to a housing need figure that is 61% lower (1,400 to 746 dwellings per annum) and, for Cherwell, 50% lower (1,142 to 762). The Plan could result in an oversupply of housing;
- other Councils (e.g.. Leeds) have delayed their plan-making in the expectation of a new methodology for assessing housing need;
- para. B.95 of the adopted Local Plan [the provision for the Partial Review] is predicated on joint work assessing the additional need for Oxford. This has not been finished. Oxford's specific needs have not been defined;
- the Council's professed obligation derives only from the agreement of the Oxfordshire Growth Board in September 2016 to share the putative in met housing need. There is no policy trigger to compel the Council to pursue the 4,400 homes;
- land use decisions as important as the boundaries of the Green Belt should not be dictated by decisions made by bodies outside of the plan making process. This further undermines the exceptional circumstances;
- failure to ensure lawful consultation;
- only a high level options paper was published at 'Regulation 18' stage [the previous informative stage of plan-making];
- at this Proposed Submission stage it has not been made sufficiently clear that any comments will only be considered as part of the Inspector's examination process rather than a revised plan. This is misleading and contrary to para. B.95 of the adopted Plan which states, *'Full public consultation will be central to a 'sound' process and outcome*';
- for consultation to be lawful, it must take place when proposals are still at a formative stage and consultees must be given sufficient information (case law cited);
- it is unlawful for residents to be invited to a consultation where the options are already decided;
- the Inspector who examined the adopted Local Plan did not require that the Council commit to meet Oxford's need as assessed in the 2014 SHMA. No local policy requires this and neither does the NPPF. The Council is misleading the consequences of pausing this process to justify pressing ahead despite the serious implications of altering Green Belt boundaries;
- the Submission Plan should become a 'Regulation 18' draft Plan, take fully the consultation responses into account and reassess the draft in light of the proposed standardised approach to assessing housing need and the determination of Oxford's housing figures;
- Oxford is progressing its Local Plan and a final figure for its housing capacity/potential is on the horizon;
- CDC should follow South Oxfordshire's approach where its Proposed Submission Local Plan is to set out "*an appropriate and reasonable response to this matter pending completion of the Oxford City Local Plan*" (SODC Scrutiny Committee report cited – 13 Sept. 2017, para. 50);
- to release land from the Green Belt there needs to be unquestionable need
- the Oxfordshire Growth Board's apportionment figure is based on a rudimentary process and its limitations should have been communicated.
- the fact that the Plan's sites are not the same as those relied upon by the Growth Board to arrive at the apportionment highlights the weakness of the methodology;
- CDC has accepted the apportionment without question suggesting a degree of precision over the apportionment that does not exist

- the Growth Board's housing figure was arrived at without any Sustainability Appraisal or Habitats Regulations Assessment
- the in-combination effects of Local Plans on traffic and in turn nitrogen deposition needs to be taken into account with regard to internationally important habitat;
- the Council's sustainability appraisal of alternative housing figures is too high level/meaningless. There has been no consideration given to their spatial implications and the effects on the sustainability baseline;
- the report to the Council's Executive of 19 June 2017 suggests that the exceptional circumstances test for development in the Green Belt is met once it has been demonstrated that Green Belt release is necessary to achieve an overarching planning gain. This is not the case;
- the exceptional circumstances test must be applied to every Green Belt parcel recognising that each is not equal (reference made to Redbridge Local Plan Examination);
- the Council is relying a tallying of Sustainability Appraisal scores for the selection of its Areas of Search. However, it cannot be assumed that each of the SA criteria has equal weight;
- as the Council did not produce a 'draft Plan' ahead of 'Regulation 19' publications stage (Proposed Submission, it is suggested that it did not meet the requirements of the SEA Directive and Aarhus Convention providing for participation when all options are open;
- the Council does not need to rush the Plan to meet the two year deadline referred to in para. B.95 of the adopted Local Plan. This has already passed with no ill effects;
- at 'Regulation 18' Options stage, the Council failed to appropriately communicate the fact that preferred areas of search had been identified (Areas A and B) and that detailed work had been undertaken to assess sites within these two areas of search only;
- following the 'Regulation 18' Options stage, the Council failed to take the next logical step of refining the options. The Proposed Submission Sustainability Appraisal presents an appraisal of the same nine areas of search which was unhelpful. The other seven Areas of Search were unreasonable, 'straw man' options;
- the Council's examination of options further afield should have been accompanied by an appraisal of sites from a Housing and Economic Land Availability Assessment in isolation as an interim step to inform genuine reasonable alternatives;
- to discharge the legal requirement to examine 'reasonable alternatives' there is a need to examine mutually exclusive alternative packages of site options where each package would provide for a quantum of Oxford's unmet needs [i.e. alternatives to the Council's proposed package of sites];
- the site options appraised are not mutually exclusive and so the Council has not fully grappled with 'reasonable alternatives' prior to preparing the Plan and consultees were not presented with a genuine choice;
- the Council did take the step of defining a discrete range of (three) alternative combinations of sites in its Transport Assessment, so it is inexplicable why it has not sought to examine (through technical analysis and consultation) genuine reasonable alternatives in terms of the full range of issues/objectives
- it is not clear that suitably detailed consideration has been given to a spatial strategy option involving a focus/degree of focus at Shipton-on-Cherwell Quarry;

- with regard to the SA (para. 10.102): (1) Shipton-on-Cherwell is not an 'active minerals site' when quarrying operations have ceased. Only an aggregate recycling facility remains; (2) Its ecological and landscape importance has been conflated; (3) there is no suggestion in evidence that the site contributes to the setting of any conservation area;
- some of the evidence relied upon by the Council is of questionable quality and there is a need to question the timeliness of its gathering. The Council is not able to demonstrate it was in place well in time to inform consideration of options/formulation of the preferred strategy;
- the Housing and Economic Land Availability Assessment (HELAA) has not been uses as an initial step to inform site selection, but instead as the site selection process itself. There is no confidence that is has been applied as an objective piece of analysis examining all site options on a level playing field;
- confusion caused by the HELAA being published as draft during the consultation;
- the role of the HELAA has not been communicated well;
- the website link to evidence document PR50 – Village Analysis study is broken. There are other broken links (Appendix E of the Landscape Study)
- the evidence document PR51- Landscape Character Sensitivity and Capacity Assessment is inaccessible and highly questionable. The quality of the 'Ecological Assessment' element of the report is questioned. All ecological sensitivity ratings are based purely on on-site biodiversity with no account of nearby sensitivities;
- evidence document PR53 – Sequential Test and Exception Test - is fundamentally flawed. It does not demonstrate why site PR8 (partly within Flood Zone 3) is sequentially preferable to other options;
- evidence document PR52 – Transport Assessment – was completed in July 2017 (with missing appendices to Appendix 6 added in August 2017). There is a lack of evidence that it was available in time to inform the considerations of options/formulation of strategy. The SA report does not draw upon its analysis and conclusions;
- evidence document PR44 – Habitats Regulations Assessment – does not provide explanation of why the proposed allocations would not lead to an impact on the Oxford Meadows Special Area of Conservation (SAC);
- evidence document PR40 – Cherwell Green Belt Study and Addendum – there is a serious question mark regarding the treatment of Shipton-on-Cherwell Quarry. On one hand it is given 'high' sensitivity. On the other it proposes the quarry to be removed from the Green Belt. The Addendum, used to justify the precise extent of the proposed allocations, lacks systematic analysis and is not referenced within the consultation materials;
- evidence document PR32 – Level 2 Strategic Flood Risk Assessment (Level 2 SFRA) – it is not clear it was completed in time to inform consideration of options/formulation of strategy. There is inconsistency, comparatively, between the conclusions for Begbroke and Islip in this document and the Sustainability Appraisal which references only the Level 1 SFRA;
- evidence document PR71 – Draft Water Cycle Study – not clear it was completed in time to inform the consideration of options/formulation of strategy. The conclusion that certain Waste Water Treatment Works are more constrained than others is not taken into account in the Sustainability Appraisal;
- evidence document PR34 – Ecological Advice – Cumulative Impacts – with regard to the recommendation;

- evidence document PR39 – National Infrastructure Commission response – Cambridge, Milton Keynes, Oxford Corridor – despite the reference in the Plan, little or no weight is given to it in other consultation materials;
- evidence document PR38 – Oxford-Cambridge Expressway Strategic Study – Stage 3 Report – the implications for the Partial Review are not drawn out. There is a 1 in 3 chance the route would be between Bicester and Oxford;
- evidence document PR48 – Equalities Impact Assessment Screening – does not reference proposed allocations or a location within Cherwell;
- there are the following additional concerns with the Sustainability Appraisal (SA)
- the analysis is overly mechanistic with a lack of qualitative assessment / professional judgment
- due to its length, the main report is impenetrable
- the 2017 report repeats analysis from 2016. Options were not refined taking into account new evidence/understanding
- sites at Islip are appraised as being 'within 2.5km of a train station' even where they are adjacent
- it fails to differentiate between the merits of sites in respect of the quality of agricultural land to be lost
- no consideration is given to the location of Air Quality Management Areas (AQMAs) meaning that there is no distinction between sites options that would/wouldn't lead to more traffic through the AQMAs
- no weight is given to the importance of supporting economic growth objectives within the Oxford to Cambridge corridor
- the Plan fails to differentiate between the merits of sites in respect of flood risk (affects site PR8 in particular)
- there is no basis for the conclusion that growth within Area of Search B is more likely to lead to significant adverse effects on landscape character of the wider countryside because its small, rural settlements are considered to have less urbanising influences on the countryside;
- Shipton-on-Cherwell & Whitehill Farm Quarries is a geological SSSI. There is no reason to suggest that its designation reflects any ecological importance;
- the non-technical summary: does not conclude that the effects would result from the Partial Review but instead from the adopted Local Plan Part 1 and the Partial Review; concludes that an outcome would be significant positive air quality effects; concludes that an outcome would be significant positive effects in respect of biodiversity due to the mitigation of the impacts of growth; concludes with a discussion of baseline issues with very limited relevance to the Partial Review (e.g. HS2); does not present suggested recommendations for mitigation measures as required by SEA regulations; does not justify the statement (para. 1.200) that those options and policy approaches that have been taken forward are those that perform more positively, or at least as well, against the SA objectives than the rejected options; and its conclusions (para. 202) include only a one sentence mention of negative effects;
- the lack of any serious engagement process including a comprehensive package of consultation events and activities. The Council has not taken any such steps to spark discussions on the issues and options;
- there is a lack of explanation in the Regulation 19 Proposed Submission documents of where the Council was in the plan-making process at the time of the consultation, nor discussion of next steps, other than in the guidance for making representations.

Kidlington Development Watch

The main points of objection raised by Kidlington Development Watch are:

- the plan is uncompliant and unsound because it does not seriously take into account the public consultation response at the options stage and the content of the plan was predetermined in advance of that consultation and carried through to the consultation on the draft submission plan;
- the Statement of Consultation misleading and inadequate. It gives the impression that responses can be ignored;
- the Statement of Consultation notes that overwhelmingly the representations objected to the suggested 4,400 figure. The Council has not made any change in response to that overwhelming response;
- at a public meeting (attended by around 300 residents) in Kidlington on 4th January [2017], the Council's representatives stated that the 4,400 houses figure was fixed and would not be changed, thereby predetermining the outcome of consultation;
- the options consultation had no question about the acceptability of development in the Green Belt, denying the opportunity to give views on this major issue and the Council denied itself the opportunity to assess these views;
- contrary to an assertion in the Statement of Consultation, the 2014 SHMA is not sound 1.11;
- the Statement of Consultation failed to acknowledge that the 470 “postcard type representations” organised by KDW and another local group included individual handwritten, personal objections to the plan and did not say how these were addressed;
- the large number of documents produced in consultations were difficult to access and the response forms long and complicated;
- both consultations were scheduled to occur over holiday periods (at Christmas and in the Summer);
- the Council has discouraged public comment on the plan;
- the plan should be withdrawn or substantially rewritten;
- the Council has failed in its duty to cooperate;
- the level of housing need is much lower than the estimate based on the assumptions of high job growth in Oxfordshire requiring many people to move into the county;
- projections of jobs growth are exaggerated in order to support funding bids from the Local Enterprise Partnership;
- the growth that does occur can continue to be directed away from Oxford as under the past ‘country towns’ approach;
- a cooperative, alternative strategy would will help to protect Oxford from over development, would be consistent with the fundamental purpose of the Green Belt, and would be sustainable;
- the expansion of Oxford is unsustainable and would lead to damage to the historic city. The Green Belt would gradually disappear;
- more housing needs to be provided within Oxford with a reduction in the number of sites identified for employment purposes. Economic growth needs to be dispersed;
- Cherwell has not satisfactorily worked with other Oxfordshire authorities and, in particular, Oxford City Council on the scale and location of sites allocated for employment purposes (e.g. Northern Gateway);

- the Oxfordshire Growth Board has not been transparent in its operation. Cooperation has not been effective;
- should be effective and more than a token process;
- projected economic growth is overestimated, exaggerated and unnecessary;
- the actual 'housing need' of both authorities is much lower than identified in the SHMA as has now been made clear from the Government consultation "Planning for the right homes in the right places" (September 2017). This results in an annual housing need for Cherwell of 762 (compared with 1142 in the SHMA) and for Oxford City a figure of 746 (compared with a range of 1200-1600 in the SHMA);
- economic considerations have been over-emphasised at the expense of social and environmental considerations;
- the 4,400 figure is not justified because it is based on the discredited calculations of the Oxfordshire SHMA;
- the existence of Green Belt is a reason not to meet assessed need;
- Oxford's need and its ability to accommodate it, has not yet been tested through a local plan examination. Its local plan is under preparation and is due to be submitted in December 2018;
- the new DCLG methodology for assessing housing need is intended to apply to plans submitted after March 2018, so should apply to Oxford's local plan;
- it would be premature for Cherwell to plan now to meet Oxford's unmet need for any number higher than 746 per annum;
- to plan for more would run the serious risks of over-allocating land and unnecessarily damaging the Green Belt;
- the specific level of help required by Oxford has not yet been "fully and accurately defined" as required by the adopted Local Plan Inspector
- traffic problems would get much worse;
- public services and other infrastructure would be even more stretched
- open countryside in the green belt, which is intended to be permanent, would be sacrificed for ever;
- countryside walks and views would be lost;
- natural habitats would be destroyed;
- the suggested net increase in biodiversity is implausible and not supported by evidence;
- environmental quality and quality of life will suffer as air noise and light pollution would increase;
- the submission document does not sufficiently take into account the recently adopted Kidlington Masterplan SPD;
- unmet housing need is not a reason for building in the Green Belt;
- exceptional circumstances for release of Green Belt have not been demonstrated because (1) the 'unmet housing need' for Oxford has not been proved (2) nor has the inability of Oxford to meet its own needs and (3) realistic alternatives to building in the Green Belt exist;
- the locations chosen for the 4,400 new houses are close to the most congested roads in Oxfordshire;
- the Local Transport Plan shows that all four roads meeting at the Peartree intersection are at or over capacity (page 27, figure 10);
- the suggestion that 4,400 new houses "would increase car journeys by 1.3-1.4%" is a meaningless statement as it does not specify where and when
- the 2013 base-date for the transport work is now out of date and, presumably, does not take into account additional traffic arising from the housing

allocations in other Districts, from allocations made in Local Plan Pt 1 and other schemes;

- the increase in car journeys would be far higher than the Council states;
- the infrastructure schedule lacks costings and funding sources;
- there is no information to show that the transport projects can be afforded;
- there is no analysis to give any confidence that the public transport improvements will meet the extra demand or achieve significant modal shift;
- the proposed housing sites are located at the other side of the city from two of its three major employment areas in Headington and Cowley;
- the transport improvements may cause considerable harm to the natural environment and to local air quality;
- object to the allocations in Policies PR6a, 6b,7a,7b,8 and 9 due to Green Belt release;
- object to Policy PR10 (Woodstock) as it would impact on the openness of the Green Belt and be an excessive and disproportionate extension to the small historic town;
- a heritage impact assessment of site PR10 should be undertaken given its proximity to a World Heritage site;
- land areas for residential development in the allocations are inconsistent with density and number of houses specified. Concern about the possible over-allocation of land for housing;
- the definition of net density is not specified;
- no projects are identified to improve the already congested highway;
- the plan appears to deny people the opportunity to use their cars and relies wholly on people using public transport, cycling and walking;
- a proper infrastructure plan and schedule should be drawn up to overcome existing problems;
- unclear about the purpose of Policy 12b in relation to sites within the Green Belt. A Green Belt site should never be supported for development in principle.

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