

**CHERWELL LOCAL PLAN 2011-2031 PARTIAL REVIEW
OXFORD'S UNMET HOUSING NEED**

**SUBMISSION PLAN
STATEMENT OF CONSULTATION
FEBRUARY 2018**

**PART 1
CONSULTATION ON THE ISSUES PAPER
NOVEMBER 2016**



1.0 Introduction

- 1.1 This Statement of Consultation describes the consultation undertaken in progressing the Partial Review of the adopted Cherwell Local Plan 2011-2031 (Part 1). It will be updated as the Council proceeds through the statutory stages of plan-making.
- 1.2 This statement has been prepared to support a formal 'Options' consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It reports on public consultation, engagement and co-operation undertaken in reaching this Options Stage.
- 1.3 The Council has a statutory duty to consult and seek representations in preparing a Local Plan. It must also ensure that there is on-going co-operation with prescribed bodies under a 'Duty to Co-operate'.
- 1.4 The Council's policy on how it engages in plan-making is described in its Statement of Community Involvement 2016. The SCI is available on-line at www.cherwell.gov.uk/planningpolicy

2.0 The 'Duty to Cooperate'

- 2.1 Section 33A (1) and (3) of the Planning and Compulsory Purchase Act 2004 (as amended) places a duty on a local planning authority to co-operate with other local planning authorities and other prescribed bodies when it undertakes certain activities, including the preparation of development plan documents, activities that can reasonably be considered to prepare the way for such preparation and activities that support such preparation so far as they relate to a strategic matter. This is to maximise the effectiveness with which those activities are undertaken.
- 2.2 Section 33A (4) states that a strategic matter is: *“sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for, or in connection with, infrastructure that is strategic and has or would have a significant impact on at least two planning areas.”*
- 2.3 Section 33A (2) requires a local planning authority *“to engage constructively, actively and on an on-going basis”* in respect of the activities that are subject to the duty.
- 2.4 The local planning authorities that border Cherwell District are:
- Aylesbury Vale District Council
 - Buckinghamshire County Council
 - Northamptonshire County Council*
 - Oxford City Council
 - Oxfordshire County Council
 - South Northamptonshire Council*
 - South Oxfordshire District Council
 - Stratford-on-Avon District Council
 - Vale of White Horse District Council
 - Warwickshire County Council
 - West Oxfordshire District Council

* Daventry District Council, Northampton Borough Council, South Northamptonshire Council and Northamptonshire County Council have established the West Northamptonshire Joint Planning Unit to prepare joint development plan documents, including the Joint Core Strategy and other joint Supplementary Planning Documents.

2.5 The Oxfordshire Councils are assisted in meeting the Duty to Co-operate by an 'Oxfordshire Growth Board' (a joint committee) which includes the local authorities within the Oxfordshire Local Enterprise Partnership (LEP) comprising, Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council and Oxfordshire County Council. It also includes co-opted non-voting named members from the following organisations:

- LEP: Chairman
- Oxford Universities
- Skills Board
- Harwell/Diamond Light Source
- LEP Business Representative
- LEP Oxford City Business Representative
- Homes and Communities Agency

2.6 In addition, when considering matters that sit under the purview of the Local Transport Board then Network Rail and the Highways England have the right to attend the Growth Board as non-voting investment partners.

2.7 The Growth Board is supported by officer and working groups as required.

2.8 Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the other prescribed bodies for the purposes of implementing Section 33A of the 2004 Act. Of those bodies listed in the Regulation it is considered that the following bodies are relevant to Cherwell District:

- The Environment Agency
- Historic Buildings and Monuments Commission for England (Historic England)
- Natural England
- The Civil Aviation Authority
- The Homes and Communities Agency
- The NHS Oxfordshire
- The Office of Rail Regulation
- The Highway Authority – Section 1 of the Highways Act 1980:
 - Oxfordshire County Council (Highways)
 - The Highways Agency (Highways England)
- Local Enterprise Partnerships:
 - The Oxfordshire Local Enterprise Partnership (OxLEP)
 - The South East Midlands Local Enterprise Partnership (SEMLEP)
- The Oxfordshire Local Nature Partnership

2.9 The application of the 'Duty to Co-operate' is also informed by the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

3.0 Consultation and Engagement

Oxfordshire Growth Board

- 3.1 In 2013, the Oxfordshire Local Planning Authorities (LPA) commissioned a new Strategic Housing Market Assessment (SHMA), supported by joint working on economic forecasting to establish the appropriate level of planned growth across the Oxfordshire Housing Market Area and the level of housing need arising in each District.
- 3.2 Officers from all Oxfordshire Authorities met on 17 May 2013 to discuss how the results of the SHMA should be considered, incorporated into emerging plans where possible and used as the basis for further joint working between the Councils. The purpose was to reach agreement and formalise joint working, provide a common basis on which to progress the SHMA and avoiding unnecessary delay to Local Plan preparation.
- 3.3 In April 2014 the Oxfordshire Local Authorities, published the SHMA for Oxfordshire.
- 3.4 In November 2014, the Oxfordshire Growth Board, a Joint Committee which, on behalf of the Oxfordshire Local Enterprise Partnership or 'OxLEP' is charged with the delivery of projects agreed in the 'Oxford and Oxfordshire City Deal' and 'Local Growth Deals, agreed a programme of work for addressing the unmet need arising from the SHMA which would help the Local Planning Authorities meet the Duty to Cooperate whilst protecting the 'sovereignty' of individual councils over their Local Plans.
- 3.5 A Project Team was established for progressing the work, co-ordinated by the Growth Board's Programme Manager and reporting to an Executive Officer Group which in turn reports to the Growth Board. Meetings of the Project Team and Executive Group have occurred regularly and been attended by officer representatives of the six Oxfordshire council. The members of the formal Growth Board comprise the Leaders of each council who were presented with periodic updates and took key decisions at scheduled public meetings.
- 3.6 From January 2015 to September 2016, the Project Team generally met on a fortnightly basis to progress, on a co-operative basis, the following projects:
- An understanding of the urban capacity of Oxford and the level of unmet housing need
 - Oxford Green Belt Study
 - Oxford Spatial Options Assessment
 - High Level Transport Assessment of Spatial Options
 - Education Assessment of Spatial Options
- 3.7 This programme of work culminated in a decision of the Growth Board on 26 September 2016 on the apportionment of Oxford's unmet housing need to the individual district and city Councils. The programme of work and the Growth Board's decision has informed the early stage of the Partial Review of the Local Plan and the Options Paper (November 2016).
- 3.8 The Councils continue to cooperate on other strategic and joint matters.
- Meetings / Discussions with Statutory and Non-Statutory Bodies***
- 3.9 In addition to meeting with bodies through the Oxfordshire Growth Board, Council officers have so far separately engaged with statutory and non-statutory bodies as follows:

- regular liaison meetings with officers at Oxfordshire County Council
- meetings with Oxford City Council and West Oxfordshire District Council
- on-going joint management arrangements with South Northamptonshire Council
- engagement with bodies on evidence gathering including Highways England and the Environment Agency
- formal consultation as part of the statutory Sustainability Appraisal process with Natural England, the Environment Agency and Historic England
- Parish and Town Council workshops (described later in this statement)
- Meeting with Oxford Neighbourhood Forums (described later in this statement)

Cherwell Local Plan 2011 – 2031 (Part 1) Partial Review – Oxford’s Unmet Housing Need, Issues Consultation: 29 January to 11 March 2016

Consultation Arrangements

- 3.10 On 29 January 2016 the Council published an Issues Paper for consultation. The Paper was prepared to engage with local communities, partners and stakeholders in the early stages of the partial review of Cherwell Local Plan Part 1, specifically to help meet Oxford’s unmet housing need. A copy of the Public Notice is attached at Appendix 1.

How did we consult?

- 3.11 The formal consultation ran for six weeks from 29 January 2016 – 11 March 2016.

Distribution

- 3.12 The consultees listed in the Statement of Community Involvement and anyone who had registered on the Council’s database were notified by letter or email and were asked to comment on the Issues Paper generally and answer specific questions.
- 3.13 Hard copies were also placed at deposit locations across the district including libraries and Council offices. In addition hard copies were placed at some locations in Oxford (Oxford City Council offices, Oxford Central Library, Old Marston Library and Summertown Library). A consultation summary leaflet and poster were also produced and were made available at these locations as well as the Council’s website. These are included in Appendix 2 and 3.
- 3.14 The document was available to view online on the Council’s website. The consultation arrangements were discussed in advance with officers from Oxford City Council and publicity material provided to the City Council to enable it to advertise the consultation as it preferred.

Press Coverage

- 3.15 A statutory notice was placed in the Oxford Times, Bicester Advertiser and Banbury Guardian to advertise the commencement of the consultation (see Appendix 1).

Social Media

- 3.16 A press release regarding the consultation was published on the Council’s Facebook and Twitter pages. The press release explained the purpose of the consultation document and provided details of the consultation including dates and locations where the documents are available to view.

Representations

- 3.17 A total of 148 representations were received which generated a total of 955 comments. A table setting out each representation in full is attached at Appendix 8.

Sustainability Appraisal

- 3.18 An initial Sustainability Scoping Report was produced for consultation to accompany the Issues Paper. All comments made are set out in Appendix 8.

Call for Sites

- 3.19 The consultation was also accompanied by a 'call for sites'. The call for sites site submission form is available at Appendix 5. A list of sites promoted through the consultation is available at Appendix 7.

Representations - Summary of Issues Raised and How They Have Been Considered

- 3.20 Set out below are summaries of the representations received in response to the Issues consultation. We also explain how they have been taken into account. The representations will be considered further as we progress to developing specific proposals.

Cherwell's Contribution to Oxford's Housing Needs

Question 1: Is 3,500 homes a reasonable working assumption for Cherwell in seeking to meet Oxford's unmet housing need?

3,500 IS TOO HIGH

- Strong objection to the obligation to meet Oxford's unmet needs. CDC has the discretion to examine whether that need can be fully met.
- CDC should challenge the accuracy of Oxford's own assessments
- The figure of 3,500 is too high because it will not commit Oxford City to finding more opportunities for growth.
- There is additional housing capacity in Oxford City; Oxford City should provide more housing/review their planning policies to encourage additional development before relying on neighbouring councils. It should be Oxford City's obligation to demonstrate that it cannot meet the target. Considerable undeveloped areas within the city which should be aggressively investigated.
- Oxford City should use more brownfield land and green belt land, as well as private college owned land, accommodating as much housing as it can, before allowing the spread of its requirements to other areas.
- Oxford needs to make more of a contribution in light of its past low delivery rates.
- CDC should challenge the SHMA because: the Oxfordshire figures as a whole reflect London overspill; the SHMA has not been subject to independent scrutiny or Examination; its figures are too high and unrealistic; it is light on

evidence; hypothetical; produced by consultants with close connections to the development industry; it is based on economic growth forecasts and not housing needs; SHMA methodology is flawed because the Universities do not need to be accommodated in or near Oxford; it does not accurately represent either Cherwell or Oxford's housing needs. There should be a critical review of the SHMA and its forecasts as part of the Partial Review.

- Cherwell has already increased its housing requirement to an excessive amount during the Local Plan Examination (by 36% from that originally proposed)
- The priority must be to ensure that the Council will meet in full the housing need for the district identified in the Local Plan Part 1 and delivering on the spatial strategy and objectives set out in the Local Plan Part 1.
- Question whether a significant uplift in housing can be delivered given the scale of growth proposed at Banbury and Bicester and in light of actual completions recorded over the five year period preceding the start of the Local Plan period (2006-2011).
- Growth allocated for in the Local Plan Part 1 already reflects a higher amount of population change than 'natural increase' and therefore Oxford's housing needs are already allowed for.
- Concern regarding the impact accommodating this amount of development would have on the aspirations and objectives of communities in the District i.e. through the Neighbourhood Planning process.
- Building more houses will only make traffic congestion worse and no new building should occur until transport problems are solved.
- 3,500 is too high given transport and traffic constraints, and other infrastructure
- The 3,500 figure should be a ceiling.
- The sites chosen should be 'non-strategic' in scale.

3,500 IS TOO LOW

- 3,500 is too low given limited capacity in Oxford City
- The true figure for Oxford's capacity is lower than the working assumption, hence the overall shortfall is actually greater and the ultimate figure is likely to be higher than 3,500.
- Oxford City has reviewed its capacity subject to a thorough check and challenge process, process was found compliant with government policy by an independent Critical Friend.
- The role of Cherwell in meeting the longer term needs of Oxford City has been underestimated.
- The 3,500 should be a floor not a ceiling
- The 3,500 is based on the midpoint of the SHMA's estimates whereas to accord with the NPPF's requirements relating to the need to 'boost significantly' the supply of housing, and to be 'positively prepared', the upper limits should be used which equates to 32,000 dwellings, rather than 28,000.

- Cherwell should provide for whatever capacity it should deliver, potentially more than 3,500.
- The uplift of 500 dwellings to take into account differences in sustainability between the districts is too low. Cherwell is the least constrained district and capable of accommodating more.
- The figure is more likely to be between 3,500 and 4,000.
- Cherwell's share of the unmet need may be proportionately higher given the strong transport, economic, social, historic and geographic links and other relationships Cherwell has with Oxford, in comparison to the other districts. 3,500 is unreasonably low.
- 3,500 is a minimum and should only be considered as an intermediate working assumption pending the outcome of the ongoing joint work. The final apportionment is likely to be higher.
- The unmet housing need relates only to Oxfordshire's HMA whereas Oxfordshire & in particular, Cherwell, might be required to meet unmet housing needs arising from London where there is a significant residual shortfall.
- A figure of 6,000 is more appropriate
- A figure of 7,000 is more appropriate
- The Partial Review needs to address in full Cherwell's contribution to Oxford's unmet needs, it should not be 'light touch'.

METHODOLOGY – NOT REASONABLE AT THIS POINT

- More should have been done to establish an evidenced working figure prior to the consultation.
- The 3,500 figure has not been consulted on
- Too early to say whether the figure is appropriate, it will be informed by evidence but 3,500 is likely to be the lower end of the possible range
- The figure of 3,500 is premature and lacks an evidence base, and precedes the Oxfordshire Growth Board's Memorandum of Understanding scheduled for August/September 2016. It should not predetermine the outcome of a sustainability appraisal process.
- Until the scale of unmet need has been identified and scrutinised through and examination, no working figure should be applied.
- Premature ahead of production of Oxford City's Local Plan.
- It is not simply a case of evenly distributing need across authorities. It is a question of capacity and contribution to strategic priorities and spatial strategy.
- The distribution of need across Oxfordshire has yet to be determined. All other authorities are awaiting the Oxfordshire Growth Board evidence base.
- Opportunities and constraints of each local authority will inform how the unmet need is distributed across the County. Some districts are more constrained than Cherwell including in terms of the Green Belt, AONB, Ancient Woodlands, SSSIs, Areas of Landscape Value, Special Areas of Conservation, Scheduled Ancient Monuments, etc. Cherwell must take a

greater share of at least 5000+ homes in order to reflect the nature and extent of constraints to development within other 'partner' authorities and to negate potential shortfalls in other districts.

- An equal split is not justified given the differing constraints in the local authority areas (Cherwell being relatively unconstrained; Vale of White Horse and West Oxfordshire Districts being the most constrained in terms of landscape designations and having inferior transport connections to Oxford). A figure of 6,000 is more appropriate for Cherwell.
- Capacity – large allocations at Didcot and Wantage/Grove are in the process of being delivered but this will take 20 years to achieve and so there is limited capacity in other districts.
- Oxford should take a higher share than other districts in order to reduce the burden on those other areas. Oxford already has more jobs than people.
- 3,500 is an unsatisfactory approach as it fails to take account of technical and environmental factors that will ultimately determine the appropriate division. Infrastructure constraints, policy constraints & ability to deliver growth should also be considered.
- The figure should be informed by capacity within Cherwell
- Cherwell has a compelling advantage in Bicester in terms of relations to Oxford, a primary focus for growth in the Local Plan Part 1 and excluded from the Green Belt, and so Cherwell should accommodate more growth than neighbouring districts.
- The size and nature of Cherwell relative to other authorities indicates that its proportion should be higher, not equal. Cherwell has two of the largest towns in Oxfordshire and the largest village in the UK at Kidlington.
- The evidence base needs to be more sophisticated than a simple mathematical calculation. A study is required to assess capacity with options tested through Sustainability Appraisal and viability testing.
- The evidence base from which the figure is derived (SHMA) has not been produced independently of the construction industry (and it is therefore biased) and was not consulted upon. The SHMA should be reviewed.
- The process is biased too much towards development (concerns over the make-up of the Oxfordshire Growth Board, its countywide housing predictions, working arrangements, and the Oxford Green Belt Study).
- Duty to Cooperate is not a duty to agree and the Council only needs to consider the extent to which unmet need arising from Oxford City may be accommodated within the District.
- Instead of using one working figure of 3,500, which is too specific, the Council should use a range of 2,500-4,500 with reasonable indicative lower and upper figures (Oxfordshire County Council).
- Options should be tested above 3,500 given that the shortfall is likely to be higher than estimated. The emerging spatial strategy should be responsive and flexible rather than capacity being fettered by the imposition of an indicative threshold based on equal apportionment.
- 3,500 is not a reasonable assumption; the calculation should be 15,000 divided by 4 not by 5 because Oxford City should not be included in the distribution, as it is their unmet need that needs to be accommodated. If

Oxford were able to meet its own unmet needs this would, by definition, not be an unmet need. The 3,500 is therefore too low. Dividing the 15,000 figure by 4 gives 3,750 units. A working assumption should therefore be made of 4,250 homes. The public interest is better served by an over provision of housing through the Plan process than an under provision at this stage in the Plan making process.

- The apportionment of additional dwellings to the Districts should await decisions on the unitary authority proposal.

METHODOLOGY – REASONABLE AT THIS POINT

- The figure of 3,500 is a reasonable assumption at this stage although it should be a minimum target to reflect tighter landscape constraints in other local authority areas.
- Even if there is no county-wide apportionment agreed by September 2016, by this time the jointly prepared evidence should allow a reasonable degree of precision and steer to identify strategic sites for meeting Oxford's unmet needs.
- Support for proceeding on this basis ahead of the Oxfordshire Growth Board's conclusions
- Support for splitting the housing requirement equally across all districts

How the identified issues have been taken into account

- The Options Paper explains the conclusions of the Oxfordshire Strategic Housing Market Assessment (2014), how the SHMA was prepared and how the level of Oxford's unmet need was identified. It also explains how the unmet housing need has been apportioned as a result of the Oxfordshire Growth Board's decision on 26 September 2016.
- The Options Paper seeks views on whether the apportioned 4,400 homes would be an appropriate housing requirement.
- The potential housing requirement has been considered in the Initial Sustainability Appraisal.

Providing for Employment

Question 2: Should additional housing in Cherwell to meet Oxford's needs be supported by additional employment generating development?

YES

- Various site specific promotions made for allocation for employment use within the Partial Review.
- Various strategies promoted i.e. supporting more employment in villages/Banbury
- Opportunities do exist for any new housing to be supported by employment development.

- Yes. What economic attractors are there in Banbury?
- Yes, this is essential; there is important future demand for logistics and manufacturing in Cherwell. The economic benefits offered by logistics should be pursued through the Partial Review.
- There is sufficient evidence to justify the allocation of additional employment sites which will assist in sustaining the planning additional housing growth.
- Yes, to do so would minimise journey lengths and provide a good balance of land uses in accordance with the NPPF and would contribute to the creation of sustainable mixed communities.
- Yes, there is a clear link between housing need and employment growth
- Yes, to reduce the need to travel
- Yes, employment generating development can include a wide variety of uses including schools, shops, community facilities as well as office and industrial space.
- Working far from home creates traffic and transport problems
- Need to avoid creating dormitory residential zones which lead to commuting for work and activities/recreation/shopping etc.
- Sustainability benefits and to reduce long distance commuting.
- Sustainable communities need a mix of uses
- Yes housing should be considered as part of a joined up strategy in order to ensure proper planning
- Yes, the NPPF has a central focus on delivering sustainable development and supporting economic growth. This means new housing should be delivered in locations that are well served by employment and community uses and infrastructure.
- Yes, para B.95 of the Local Plan notes that the 'joint work will need to comprehensively consider how spatial options could be supported by necessary infrastructure to ensure an integrated approach to the delivery of housing, jobs and services.'
- The Partial Review offers the opportunity to realise economic benefits that would otherwise have been unachievable (in accommodating what would have been Oxford's resident population). More ambitious economic development can be achieved. As Oxford's unmet need in respect of Cherwell will be concentrated around North Oxford, it would be appropriate to take advantage of the opportunity created by the cluster of world class economic assets i.e. high value employment.
- Given that the need for housing arises in part through the forecast employment growth, there is a need to align policies and provision for housing and employment generating development in the partial review. There are also benefits to doing so in terms of transport and infrastructure.
- Yes as per the aims of OCC's LTP4 (colocation).
- Yes there is already an under provision of employment opportunities in Cherwell i.e. Banbury.
- Yes, local planning authorities need to consider all development requirements (not just homes) when fulfilling their duty to cooperate. It is important that

sufficient employment land is also allocated to support the growth of Oxford and this should be in an area with a strong relationship to the City.

- There is no employment land supply issue in Oxford City which needs to be resolved in Cherwell through this review. However there may be specific employment needs to be accommodated alongside housing through mixed uses. Consideration could also be given to collocating expanding employment uses with options for meeting Cherwell's local employment needs (Oxfordshire County Council).

NO

- Oxford is the main driver of economic growth and housing need in the area and it is not therefore necessary to plan for additional employment development.
- Cherwell's own jobs need has been accommodated in the Local Plan Part 1. Additional employment provision would not meet Cherwell's own needs and so would contravene the Local Plan.
- There is low unemployment in this area; the provision of additional employment will increase the need for housing.
- New housing should not be accompanied by employment development; this would result in out-commuting from Oxford and would not be seeking to meet Cherwell's own needs.
- The housing figures are already based on unrealistic forecasts of growth in employment, to provide for more employment is creating a vicious circle.
- No, the suspect assumptions leading to the overstated housing needs in the SHMA were based on employment growth already
- More employment would generate more demand for housing, exacerbating the problem & creating a cycle of continuing growth pressure
- It makes no sense to supply new housing in Cherwell to meet Oxford's needs, if the additional employment is created in Cherwell to serve those homes. That would result in both housing and employment having nothing to do with Oxford where the need is, as Oxford already has more jobs than people to fill them.
- No, it would be inappropriate to create more jobs in Cherwell to employ people already required for jobs being created in Oxford
- No, flawed concept. If employment is identified for Oxford City's growth then the housing to support it should also be within Oxford City.
- A review of the empty employment buildings in Oxford should be undertaken first.
- If the root cause of the housing need is from those employed in Oxford, London, Reading, etc then no, similarly if it relates to those commuting into Cherwell then the answer is no.
- There is plenty of employment in Oxford/close to Oxford already (such as Begbroke, the Airport etc). There is an excessive amount of employment already.
- No, this would prejudice Cherwell's own strategy. An exception would be to relocate some of the higher technology business planned for Oxford to

Bicester, where employment opportunities otherwise may not match housing growth.

- No because there is no evidence to support a housing need at all so therefore no employment need either.
- The purpose of the Partial Review is to accommodate Oxford's housing needs.
- This would damage other areas of the UK which have more housing stock but few employment opportunities.
- Need not greed. Use a rigorous method of assessing need by reassessing the baseline figure.

MAYBE/OTHER

- The two issues can be joined up by providing the necessary housing on the appropriate sites near to existing employment locations.
- Oxford is already a major employment hub so it is questionable if additional employment is required. Any new employment should be sustainably located with access by public transport, positioned along the Oxford-Bicester railway line or the A34 corridor. New employment, particularly B8 uses, should be located on transport corridors or where public transport can be utilised, not in rural areas.
- Wherever possible employment should be local to housing. This may mean moving some major sources of employment outside Oxford.
- Should refer to the NPPF's guidance on sustainability. Careful thought must be given to economic links with Oxford City and existing centres. Consideration should be given to economic links within Cherwell and suitable locations to deliver new homes and employment (i.e. Bicester)
- Any employment provided should be ancillary to the housing being planned for or responding to a specific need arising from one of Oxford's key sectors. Overprovision would create further pressure on the housing stock and require a greater level of housing growth required.
- Additional employment development must be consistent with the economic objectives established for Oxford and should not undermine the strategies and objectives for Cherwell. Any new employment must not dilute the value of existing employment provision i.e. RAF Upper Heyford.
- Presumably Oxford's identified housing need is based partly on that needed to support economic growth. If that economic growth was then to be provided outside of Oxford, it would be reasonable to expect the overall housing need of Oxford to be reduced accordingly (Historic England).

How the identified issues have been taken into account

- Cherwell's employment needs are provided for by the adopted Local Plan Part 1. The purpose of the Partial Review is to contribute in meeting Oxford's unmet housing need. The SHMA's projection of need is based on a committed economic growth scenario. The Options Paper considers the responses received to the question including the views of Oxford City Council in relation to the need for additional employment development.

- Paragraph 3.37 refers to Oxford City Council's advice that support will be given to the provision of further employment that is either ancillary to the housing being planned for, to support the principles of sustainable mixed-use development, or responds to a specific need arising from one of Oxford's key sectors.

Oxford's Key Issues

Question 3: What are Oxford's key issues that we need to consider in making a significant contribution to meeting the City's unmet housing need?

- Specific sites/locations for growth promoted or suggested.
- CDC must consider Oxford City Council's adopted vision; development patterns within Oxford; employment provision within Oxford; the employment needs/opportunities of Oxford and how these relate to Cherwell; transport connections with Oxford City which can be utilised; infrastructure provision; constraints such as Green Belt and flood risk; housing need; and social and historic connections.
- Agree with the summary of housing issues in the consultation document
- Need to retain large green spaces particularly the Kidlington Gap
- The relationship of new housing to the City itself
- Development potential of / protection of Green Belt land and demonstration of exceptional circumstances (housing need, homes/jobs imbalances, affordability, traffic congestion, recruitment issues, housing capacity in the City, lack of alternatives).
- Need to consider land beyond the Green Belt.
- CDC should consult with developers in a Developers Forum and also run a 'Constraints & Opportunities workshop to help define strategic inputs to the new spatial plan.
- Is the housing target figure correct/evidence base concerns
- What is the capacity in Oxford City (spare space and empty premises)
- Additional documents highlighted for review which summarise the key issues
- Housing location is the key issue and that should be defined by transport and infrastructure availability
- Housing affordability (various including Oxfordshire County Council) / Starter Homes
- Difficulties in staff recruitment caused by poor affordability and housing choice as well as overcrowding, homelessness and poor living conditions. New housing should provide a very wide mix of housing types and tenures
- Need to review the City boundaries to ensure the level and type of housing is consistent with the economic requirements of the growing city
- Maintaining the historic environment
- Flood risk
- Other environmental constraints

- Growth should be diverted away from Oxford across the County and beyond i.e. Oxford Brookes University could be relocated to Bicester
- Oxford requires improved public transport infrastructure i.e. use of a tram system and improving access from Kidlington & Witney, and improved cycle routes into the city. Congestion charging should be introduced.
- The need for sites to have good accessibility by fast and frequent public transport; cycling and walking into the City Centre and to other key employment locations in Oxford (Oxfordshire County Council)
- Traffic movements in and out of the city; the need to minimise travel demand (Historic England)
- Opportunities to improve sustainable transport infrastructure including investment in high quality public transport corridors
- New housing should focus on existing transport corridors, or corridors which could be enhanced through additional funding.
- Relationships between new housing sites and the Oxford Transport Strategy should be considered i.e. locating housing near to Park & Rides of a Rapid Transport Route. Sites should support such infrastructure and not prejudice the delivery of these measures (Oxfordshire County Council).
- Quality and design of new housing is key
- Oxford aims to be a Low Carbon City
- Key issue is to accommodate needs as close to possible as to where it arises, sustainability benefits of doing so.
- Scarcity of previously developed land in Oxford City.
- Protection and enhancement of the built and natural environment.
- Need to not destroy what makes Oxford special
- Views into and over the city, including those identified in the Oxford Viewcones Study, and how they contribute to the significance of the city (Historic England)
- Whether land has historic significance – check the Historic Environment Record and the Historic Landscape Characterisation (Historic England)
- The need to avoid adverse effects on the character, appearance and special interest of the Conservation Area (Historic England)
- Nature conservation assets
- Protection of open areas within the City which contribute to its character.
- Extensive open areas which are not in public use which should be considered for housing
- It is up to Oxford City to define its own issues
- It will never be possible to accommodate all of Oxford's needs within the City boundary
- The City Council needs to re-examine its priorities to achieve a better balance between housing and employment.
- Constraints assessments of the designations affecting all the local authority areas surrounding Oxford will inform capacity.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 of the Options Paper.

Question 4: What are the key principles or goals that the additional growth in the District should be aiming to achieve?

- Site specific promotions made
- To make the best use of existing and planned infrastructure and to minimise the need for new infrastructure (Oxfordshire County Council)
- Should consider issues such as quality of life, prosperity, happiness and health of existing residents.
- Protect Cherwell
- The key goal is to limit impact of development on Cherwell, and its inherent infrastructure impacts.
- Bicester needs more local employment and an improved town centre.
- Maintaining the vitality of Kidlington and its ability to serve its hinterland
- Maximising the regeneration of Banbury
- New communities should be balanced and not impose unreasonably on established settlements.
- Development should be sensitive to the setting context of its existing surroundings.
- To preserve the relationships between villages in terms of size and access to services
- Too early to comment upon this until the evidence base is complete as well as the strategic work of the Growth Board, which should be reflected in the vision.
- Until the spatial strategy is set, the apportionment of unmet need cannot be determined.
- Should not compromise the existing vision for growth/objectives in Cherwell Local Plan Part 1
- Additional growth at the locations focused upon in the Local Plan Part 1 would support the foundations laid by the Part 1.
- Growth should be distributed around some parts of Cherwell in stages, monitored and reduced downwards if necessary.
- The unmet need should be met in full across the Oxfordshire HMA in a sustainable, deliverable and transparent manner.
- Should reflect existing strategies including the adopted Local Plan Part 1 and LTP4.
- Making the most of existing exceptional transport links

- Bringing forward development in areas with transport links to Oxford.
- The most sustainable locations should be identified and given greater weight including consideration of infrastructure and sustainable transport links.
- Due consideration should be given to locations that meet local needs, but also to the identification of locations that accommodate sustainable transport opportunities to Oxford.
- New housing should have ready access to public transport/allow for travel to Oxford and beyond in an environmentally friendly way.
- Providing for better public transport, safer cycling and eliminating congestion.
- Considering car free or low car use development
- Meeting housing need as close as possible to where it arises
- As per the three aspects of sustainable development defined in the NPPF (economic, social, environmental)
- Consideration should be given to the NPPF, NPPG, the Oxford Core Strategy and Local Plan Part 1.
- Secure high quality yet affordable design, exemplar high quality developments.
- Key aim should be to provide affordable accommodation for those who are employed in Oxford
- People should have access to suitable and affordable accommodation which they cannot attain within Oxford City.
- Provision of key worker housing
- Development should be truly sustainable, well designed and planned
- Secure a good living environment
- Development should promote healthy living
- Creating sustainable, inclusive, mixed communities
- New development to be physically and socially integrated with Oxford's existing communities
- Bringing forward housing in locations with socio-economic links to Oxford
- Achieve an enhancement to Oxfordshire's economy
- Any additional growth should have excellent access to existing and future employment sites
- Development should foster research and development to boost the local economy
- Facilitating economic growth to support housing which compliments Oxford City and Cherwell's economies
- Harnessing the value generated by new strategic development to deliver economic benefits
- Retaining a skilled labour force within the district
- Providing new development close to, and providing for investment in, existing centres.

- Providing services, facilities, and infrastructure or providing for good access to these
- Deliver infrastructure before not after housing
- Contribution to providing improvements to infrastructure to benefit existing residents and visitors
- Twinning the provision of housing and infrastructure
- Planning new development in such a way as to facilitate new infrastructure i.e. a concentration of 1,000 homes needed to make a new primary school viable (Oxfordshire County Council).
- Sites on strong public transport corridors (both bus and rail) should be considered for low car or car free development (Oxfordshire County Council).
- Providing sufficient facilities on sites to serve the needs of future residents
- Planning at the neighbourhood level to deliver services necessary to support day-to-day needs within walking distance
- Limiting growth in rural settlements
- Avoiding sprawl
- Avoiding coalescence
- Retention of the Green Belt
- Protecting the environments
- Need to avoid development in protected areas including AONB and other areas protected for their inherent qualities or constraints (such as floodplain)
- Unused sites of lesser environmental value need to be brought forward
- Maintain, enhance and protect biodiversity
- Addressing climate change.
- Meeting Oxford's needs in a sustainable manner
- Minimising the use of non-renewable resources
- Making efficient use of land
- Achieve the conservation and enhancement of the District's historic environment and the heritage assets therein (Historic England)
- Looking beyond the plan period, as the need from Oxford is likely to continue well beyond then
- Housing to be deliverable in the medium term (by 2031) and supported by a clear delivery plan.
- Cooperation and communication between the Oxfordshire local authorities
- Making a significant contribution to Oxford's unmet housing need.

How the identified issues have been taken into account

- The issues were taken into account in considering the draft Vision and Objectives for meeting Oxford's unmet housing needs in Cherwell in Section 5 of the Options Paper.

Question 5: What should the focused Vision for meeting Oxford's unmet need contain?

- Since the Partial Review is only an Addendum to the Adopted Local Plan, it must contain the same vision, aims, objectives and spatial strategy of the Local Plan Part 1. To alter the directions of growth would undermine a clear vision or direction for the Local Plan.
- To achieve additional growth without adversely impacting Cherwell's own growth strategy
- It should accord with the existing Vision for Cherwell District Council if it is to be considered as an Addendum.
- It is not possible for there to be an 'Addendum' vision or strategy as the whole basis of the Local Plan would have to be rethought as neither of the two major towns have any additional capacity.
- Too early to comment upon this until the evidence base is complete as well as the strategic work of the Growth Board, which should be reflected in the vision.
- Emphasise the need for better road, rail & cycling infrastructure. Cherwell needs a focal point in the south of the district (economic and leisure activity) to reduce pressure on Oxford i.e. comparable to Abingdon.
- The focused vision should build on the existing vision and seek to provide balanced housing supply in locations which are sustainable and meet the needs of Oxford City Council. This should be addressed through strategic allocations at established settlements with strong transport and socio-economic links to Oxford City, i.e. Bicester.
- New development should ensure significant investment in open space, sport and recreation provision, and the enhancement of biodiversity, and full infrastructure which is easiest to achieve on larger sites
- New allocations should take local character and the enhancement of heritage assets into account
- Development should be delivered without unacceptably affecting Cherwell's natural, built and historic environment (Historic England).
- It should promote sustainability
- Additional documents listed for review to inform the new Vision including LTP4 and the Oxford Transport Strategy (Oxfordshire County Council)
- There is a danger of Cherwell's communities, particularly Banbury, becoming dormitory/commuter towns which would be a complete negation of the County Council's transport strategy.
- To provide new balanced communities that form part of Oxford
- Exemplar design requirements
- Provide for a range of household types and incomes. Good quality, realistically priced, low cost housing for purchase and rent must be prioritised.

- Ensure sustainable, affordable and convenient access to Oxford employment opportunities
- The Vision should deliver the key principles and use them to Masterplan high quality neighbourhoods that enhance the District and offset the loss of Green Belt.
- Make a clear commitment to meeting unmet housing needs in the most sustainable way
- Achieve a review of the Green Belt VS Protection of the Green Belt.
- Allow for the colocation of jobs and homes on an area wide basis
- Ensure that the day to day requirements of new residents in terms of facilities and services are met
- The most sustainable solution may not be Cherwell or indeed Oxfordshire. Consideration should be given to areas of the country with vacant employment land and less expensive housing
- Promoting the prosperity of the Oxford region as a whole
- Oxford's international ties and recognition should be a key focus of the vision.
- There must be provision of a range of employment opportunities suitable for a wide spread of abilities and skills
- Need to consider the Duty to Cooperate with other authorities not just Oxford.

How the identified issues have been taken into account

- The issues were taken into account in considering the draft Vision and Objectives for meeting Oxford's unmet housing needs in Cherwell in Section 5 of the Options Paper.

Defining an 'Area of Search' or Plan Area

Question 6: Do you agree that the 'area of search' or plan area for the Partial Review document should be well related to Oxford City?

YES

- Support for this, particularly where access to Oxford is sustainable.
- Yes, since the options are to meet Oxford's unmet need; anything else would not be sustainable development (Oxfordshire County Council)
- Yes, the relationship should be geographical, taking into account connectivity and accessibility to the city centre.
- The area of search should be well related to Oxford City and this means land closest to the City, but outside of the Green Belt, with excellent transport links and access to day to day services and facilities without significant travel (i.e. on the edge of existing settlements).
- The housing should be well related to Oxford City in a location that is well connected to the strategic transport network.

- The area of search should be within 5 miles of Oxford or within easy reach of frequent public transport with plenty of parking
- Yes this would enable development of the areas being served by the new Oxford Parkway mainline station.
- Meeting the need close to where it arises would be most sustainable
- There are transport and sustainability concerns in accommodating development at a distance from Oxford (i.e. Banbury). The focus should not be around Banbury but closer to Oxford.
- Yes, consistent with sustainable development (in terms of reducing commuter traffic) and minimising contributions to climate change
- Yes, to reflect economic links to Oxford and significant employment provision in Oxford.
- Yes, to avoid longer distance commuting
- Yes, with areas directly accessible to rail services into Oxford from either existing or potential new stations
- Yes, the scale of the housing need and the social and economic problems which would arise by not making provision close to Oxford provides an exceptional reason to review the Green Belt.
- District wide would be an irrelevance, the issue is to accommodate the large number of people who work in Oxford but cannot afford to live there. Otherwise the housing provision would not be likely to meet Oxford's housing need
- Yes, to do otherwise would run counter to the objectives of sustainability and risk undermining social cohesion by directing housing to some distance away from where needs are being generated.
- Yes, but Green Belt loss should be entirely justified.
- Yes, with Green Belt land swaps considered
- Yes, well related in terms of functional relationship and with connectivity and accessibility in terms of infrastructure and transport
- Yes but other considerations need to be taken into account, including the potential effects on the historic environment (Historic England).
- Yes, to reflect the catchment orders of higher order services at Oxford
- Yes, the new housing locations should have a strong relationship with Oxford and be on the knowledge spine, so as not to undermine the existing plans and strategies for Oxfordshire.
- Yes, and in particular, the Oxford Gateway could accommodate more housing, rather than eating further into Green Belt land.
- Yes, and more housing can be accommodated within Oxford.
- Yes, and a sieved approach undertaken with all sites considered but more constrained sites sieved out.
- The potential for an urban extension to Oxford or new garden village close to Oxford should be examined (accommodating the housing need in one location for ease of infrastructure provision).

- There are major infrastructure constraints at Bicester limiting future development potential.

NO

- It is not always possible, practicable or environmentally sustainable to concentrate the unmet need close to its source.
- Oxford is the major employment hub for the whole region; the area of search should include the whole district.
- Oxford should not be the sole driver
- Adjoining SHMA areas have also identified the pressures for additional development.
- The most sustainable settlements in Cherwell are located further away from Oxford City.
- New development should be located far from Oxford, but with highly efficient public transport links.
- Closer settlements i.e. Kidlington are constrained by the Green Belt

MAYBE/OTHER

- The existing Spatial Strategy is the most appropriate model
- Given that Cherwell are undertaking only a partial review it is important that the area of search is consistent with the adopted plan strategy which was found sound only last year.
- The tests should be how well different areas relate to Oxford. Accessibility to Oxford should be a key criterion
- Not necessarily, there will be different priorities in different areas i.e. protecting the Green Belt.
- No area of search needed. There is a single Housing Market Area within Oxfordshire. The entire Oxfordshire HMA is therefore well related to Oxford City.
- The area of search should be well related to Oxford City but not necessarily the area in closest proximity.
- Areas in close proximity to the City will not necessarily perform better than other areas which may be more conducive to sustainable travel
- Constraints should also be considered
- Close proximity but in combination with other sustainability factors
- No, growth should be directed beyond the County altogether
- Area of search should not rule out Green Belt release
- The Council should establish an effective, continuous ring fence policy area
- Meeting the needs of Oxford in Cherwell should deliver benefits to both the district and the City. There should therefore be the delivery of significant infrastructure.

- Concerns at potential conurbations being created in the south western part of the district around Oxford.
- Location/Site specific promotions made.

How the identified issues have been taken into account

- Section 6 of the Options Paper sets out the options identified for meeting Oxford's unmet housing needs which there are nine areas of search being considered.

Question 7: What factors should influence the 'area of search' or plan area for the Partial Review document?

- Site/location specific promotions made
- It should focus on existing settlements.
- Need to protect rural areas in Cherwell.
- The sheer number of homes required means an extensive area of search is required.
- Oxford is the major employment hub for the whole region; the area of search should include the whole district.
- The area of search should not be overly prescriptive
- Assessment of capacity within Oxford itself
- Sustainability of the location
- Opportunities to create new freestanding communities
- Proximity to Oxford (using Green Belt if required) (various including Historic England)
- Connectivity to Oxford.
- Provision of sustainable transport options particularly in terms of providing sustainable access to Oxford.
- Transport links to Oxford and key employment locations within the City (public transport, also walking, cycling)/transport corridors and the need to address existing connectivity issues (various including Historic England and Oxfordshire County Council)
- Existing commuting patterns
- Supporting the County's transport strategies
- Ability to deliver new (transport) infrastructure
- Cuts to bus services in rural areas should be taken into account, combined with a lack of road improvements to roads in the north of the County.
- Proximity to sources of employment and 'travel time', ensuring that economic efficiencies & quality of life are not affected by commuting.
- Local employment

- Economic links to Oxford, access to the employment market of Oxford
- Consideration should be given in defining the Area of Search to how housing growth could complement/support existing strategic employment locations and support economic growth as a direct benefit.
- The plan review should also consider unmet employment needs from the City.
- If employment generating development is provided alongside the new housing, then area of search could be wider (Historic England).
- Access to services and facilities
- Capacity
- The opportunities to deliver new housing including proposed infrastructure improvements.
- Accepting additional development is unlikely to be popular and it is important to address political opinion for example there may be opportunities for development to provide solutions to longstanding issues including through the delivery of 'game changing' infrastructure. Including the delivery of a regional scale sport and leisure facility.
- Proximity to existing allocations
- Functional relationship with Oxford
- Availability of unused brownfield land
- Potential for high density development
- Equitable growth across rural areas
- Environmental efficiency
- Planning policy considerations
- Green belt protection VS. using areas of the Green Belt that do not meet the five Green Belt purposes
- Housing affordability
- Physical constraints
- Environmental issues
- SEA
- Landscape value
- Social connections to Oxford
- Social and community facilities/ services such as education and catchment areas
- Cherwell settlement hierarchy
- Flood Risk
- Impact on heritage/historic environment (Historic England)
- Contribution to existing strategic priorities and the spatial strategy as well as other strategies such as the Oxfordshire Strategic Economic Plan, LTP4, Growth Deal, and City Deal which requires supporting connectivity along the knowledge spine.

How the identified issues have been taken into account

- Section 6 of the Options Paper sets out the options identified for meeting Oxford's unmet housing needs for which there are nine areas of search being considered.
- A list of identified sites is also provided in Section 6 of the Options Paper.
- The consideration of the areas of search is included in Section 7 of the Options Paper.

Question 8: Would a district-wide area be appropriate?

YES

- Support for and against this question
- Oxford is the major employment hub for the whole region; the area of search should include the whole district.
- The whole district should be considered but strategic allocations will be required, particularly in locations with the closest relationship to Oxford.
- The most sustainable settlements are not necessarily those closest to Oxford.
- Yes and as per the existing spatial strategy in terms of distributing growth to the most sustainable locations and protecting important areas.
- Yes and the Adopted Local Plan Part 1 provides an appropriate starting point and basis for considering the most appropriate distribution of sites across the District as per the established settlement hierarchy. A District wide approach will enable the potential for additional housing development to assist in providing other investment across the District in accordance with the hierarchy.
- Yes as one of the most sustainable locations in Oxfordshire (Banbury) is in the northern part of the district
- Yes, the District as a whole forms part of the Oxfordshire HMA and there is no specific requirement to identify sites that relate well to Oxford in order to deliver the additional housing required within the HMA. Proximity to Oxford must be weighed in the balance amongst many other economic, social and environmental factors including deliverability.
- The imposition of areas of search might close off options/locations within which growth can be sustainable accommodated and would be unduly limiting. Assessments of accessibility and connectivity should be considered.
- Yes, if employment generating development and other facilities and services are provided alongside the new housing (Historic England).

NO

- No, some areas of Cherwell do not relate well to Oxford (Oxfordshire County Council)

- No, access to Oxford from rural areas in the north of the County is difficult (with cuts to train and bus services and improvements needed to the road network).
- No, this would effectively increase the Local Plan Part 1 housing requirement still further, to levels which are unlikely to be achievable within the current spatial strategy.
- A district wide approach would displace the population
- It would increase potentially unsustainable transport journeys/commuting patterns back into Oxford
- No, the existing Local Plan seeks to reduce out commuting so development should be as close to Oxford as possible.
- It should reflect accessibility to Oxford as an employment centre.
- It would conflict with the Local Plan policy of restricting development in the rural areas
- Parts of the district have no great economic connection to Oxford
- This would put all parts of the district, at every tier of the settlement hierarchy, at risk of speculative development.
- Need should be met where it arises i.e. Oxford/close to Oxford.
- In locations already proposed for significant growth i.e. Banbury, Bicester, Upper Heyford, the market is unlikely to deliver significant additional housing to meet Oxford's unmet needs.
- Only if all suitable and deliverable sites close to Oxford have been appraised, and allocated where appropriate, should sites further from Oxford be considered.
- A district wide area of search would include the Green Belt, the boundaries of which should only be amended in exceptional circumstances.
- Parts of the district lie on the very periphery of the strategic housing market area.
- No, the area of search should be influenced by seeking to reduce commuting and protecting the rural areas of Cherwell.
- The Area of Search should concentrate on the Oxford Fringe where infrastructure is more readily available in order to ensure that rural infrastructure does not become overstretched.
- An Area of Search approach would provide a more pragmatic and manageable solution as well as providing certainty to the areas that will be subject to additional development pressures and so that the established spatial strategy of the Local Plan Part 1 can be preserved.

MAYBE/OTHER

- The potential for an urban extension to Oxford or new garden village close to Oxford should be examined (accommodating the housing need in one location for ease of infrastructure provision).
- Sites should be suggested anywhere in Cherwell, but priority should be given to locations within 5 miles of Oxford City

- A District wide area of search is appropriate however an initial sieve map approach will quickly rule out certain areas due to environmental constraints or the lack of infrastructure
- There should be a focus on utilising brownfield land
- Although a district wide area may not be appropriate, there is justification for an area of search wider than the southern part of the district.
- Only if improvements to road infrastructure are made and the modal shift detailed in LTP4 achieved.
- To be determined by the Sustainability Appraisal
- Scope for further allocations around Banbury and Bicester is limited and questionable in terms of actual deliverability. The alternative is other strategic locations, lower tier settlements, or sites located in the Green Belt.
- In the locations already proposed for significant growth – Banbury, Bicester, Upper Heyford – the market is unlikely to be able to deliver significant additional housing to meet Oxford's unmet needs (Oxfordshire County Council)
- A variety of sites in the widest possible range of locations will meet the widest possible demand and therefore maximise delivery. The extent of the unmet need and the immediate urgency of doing so means sites must be deliverable in the short term.
- It may well be the case that multiple Areas of Search are identified, responding to appropriate development opportunities.
- Site specific promotions made.

How the identified issues have been taken into account

- Section 6 of the Options Paper sets out the options identified for meeting Oxford's unmet housing needs for which there are nine areas of search being considered.
- A list of identified sites is also provided in Section 6 of the Options Paper.
- The consideration of the areas of search is included in Section 7 of the Options Paper.

Question 9: Should an area based on the Oxford Green Belt be considered?

YES

- Yes, site/location specific promotions made.
- Yes, re-evaluate what is set aside to produce a better mix of open spaces and urban edges.
- Yes, far more environment harm is being created by commuting into Oxford than any benefits of keeping the Green Belt particularly land which no longer fulfils the purposes of designation. Instead, rural belts should be defined around the rural settlements in the district.

- Yes, the Green Belt has been one of the principal inhibitors of the natural growth of a dynamic city.
- Incursion into the Green Belt is required to deal with housing shortages and traffic congestion.
- Yes, the Green Belt continues to restrict the location of development in what is the most sustainable and logical location i.e. close to Oxford City
- Yes to reduce commuting distances from Oxford – proximity and transport links and promote sustainable patterns of development.
- Yes, the Green Belt land in Cherwell is well situated to provide new homes for workers at Oxford's key employment hubs along the Knowledge Spine.
- Yes, the Green Belt in the Kidlington area is a major transport interchange particularly with the new development of Oxford Parkway station which has been constructed with sufficient capacity to support growth in the local area.
- Yes but only to the extent that siting development in the Green Belt does not lead to significant and demonstrable harm which undermines the very purpose of designating land as Green belt – prevention of urban sprawl.
- Yes following Cambridge's successful examples.
- Yes with a focus on linear development in existing corridors which already impact on the Green Belt.
- Yes with potentially the use of Green Belt land swaps/replacement elsewhere to maintain its function in restricting urban sprawl
- Parts of the Green Belt have lost their green nature over time and development in these areas would be better than in more rural parts of Oxfordshire.
- Yes, certain parts of the Green Belt contribute less to its functions and purpose than others.
- Green Belt boundaries are due a review, it is 40 years since designation.
- Yes, LUC's Green Belt Study identified where locations make limited contributions to some of the Green Belt purposes. A more refined study of the Green Belt is now required.
- Yes the Green Belt is a clearly defined geographic area, close to Oxford, and is the obvious 'area of search'.
- Yes, there are clear exceptional circumstances for Green Belt Review.
- Yes, with a focus on the inner boundaries adjoining the built edge of Oxford City
- Yes as per the Inspector's recommendations
- Yes, in order to accommodate the growth required and for the Partial Review to be 'positively prepared' and therefore sound.
- Yes particularly where growth could help to support the sustainability of a settlement within the Green Belt.
- Yes, protection of the 'Kidlington Gap' is no more important than preventing coalescence between other settlements in the district (which is not always achieved). Prevention of coalescence should be applied to all Category 1 villages.

- Yes, as a preference over development at villages being consumed by towns i.e. Bodicote/Banbury.

NO

- Oxford is the major employment hub for the whole region; the area of search should include the whole district.
- No. Individual small scale housing supported in small Green Belt villages but not large scale estates in the Green Belt. Woodeaton Quarry should be restored as agricultural land and not used for housing. Any mass building on the Oxford Green Belt will make transport problems in and around the city worse.
- Development in southern Cherwell could impact the Green Belt so there should be clear justification for this.
- Strong objection to any development on the Oxford Green Belt: the Green Belt has a very special function, in Cherwell as elsewhere, to protect the countryside and open and green spaces and to act as a buffer against the spread of urban development and coalescence between settlements. In Kidlington, the Green Belt surrounding the village is precious and highly cherished by the community for its health, environmental, visual, and recreational value.
- Development around Kidlington would be unsustainable particularly in the Kidlington gap.
- The Kidlington gap serves to prevent coalescence
- This would open the door for further encroachments on the Green Belt
- Undermines the permanence of the Green Belt
- National policy says that housing need is not a reason to build on the Green Belt
- The Government has made a commitment to protect the Green Belt
- If there are opportunities to jump the Green Belt to deliver the necessary housing and associated development, these should be explored before the Green Belt is reviewed.
- No, there should be more review of the housing potential within Oxford before Green Belt is considered for housing.
- All Green Belt parcels contribute to the purposes of the Green Belt therefore justifying its original designation.
- An area of search based on the Green Belt would not necessarily lead to options which have good accessibility to public transport services to Oxford Centre and key employment locations within the city. The area of search should include Green Belt land within transport corridors through the Green Belt but should not be contiguous with the Green Belt boundary (Oxfordshire County Council).
- No, the area of search should be district wide and in conformity with the existing spatial strategy i.e. Banbury and Bicester. An 'addendum' to the Local Plan Part 1 should be in conformity with that plan, and a full strategic review of the Green Belt could result in an entirely new vision and strategy and be unsound.

- No, ample opportunities exist for housing in areas beyond the Green Belt.
- No, eroding the Green Belt would take benefits away from future generations that they would otherwise have enjoyed hence unsustainable.
- Green Belt land around Kidlington is used for recreation; loss of this land to housing would increase obesity.
- No, because the housing need arising is not Oxford specific, it arises from hypothetical future jobs which could be realised anywhere.
- No, this would lead to unrestricted sprawl, contrary to national policy
- No as per the Local Plan Inspector, he did not indicate that the Partial Review should be focused only the Oxford Green Belt.
- No, the area of search should take in the whole District and the Green Belt should ideally be excluded from the search areas altogether. The importance of the Green Belt particularly in terms of preventing settlement coalescence (and linked to this the protection of village identity) is noted in the consultation paper.

MAYBE/OTHER

- Green Belt land could be considered, informed by a review, but not where development would be using best and most versatile agricultural soils (Natural England)
- It should be ensured that any options put forward within existing Green belt land are in fact viable options for development in order to accord with the NPPF (Natural England)
- It is clearly important to maintain the Green Belt to ensure that urban sprawl is controlled and coalescence does not occur, but a Green Belt review must be undertaken to consider if the designation is fit for purpose.
- Continued work should be undertaken by the Oxfordshire Growth Board to determine the potential release of some of the designated Green Belt land. Await further progress of the Oxfordshire Growth Board work first prior to use of Green Belt land for housing.
- The Oxfordshire authorities should take a closer look at the submarkets within the Oxfordshire HMA and define the 'area of search' or plan area from this.
- Oxford Green Belt constrains the potential to meet the 'objectively assessed needs' and this is a valid constraint.
- Green Belt is not the only reasonable alternative to consider.
- Green Belt locations should not be automatically excluded from consideration; this must be weighed in the balance of all relevant factors. Green Belt releases should only be considered where alternatives have been exhausted including brownfield sites, which should be prioritised over greenfield land, and which are shown to be suitable, deliverable and achievable.
- Concern that the Oxford Green Belt Study by LUC categorises parcels of the Green Belt surrounding Oxford with an OX prefix rather than a Gosford and Water Eaton/Cherwell District prefix (Gosford & Water Eaton Parish Council).
- Historic England should have been consulted on the Oxford Green Belt Study given their remit & the purposes of the Green Belt which includes preserving

the setting and special character of historic towns. The consideration of impacts on the historic environment should inform the allocation of sites (references made to sources of further information) (Historic England).

- The Area of Search shouldn't be narrowed too far; broad areas should be considered initially even if later discounted based on constraints (Natural England).
- The Partial Review needs to give weight to the Government's position on protecting the Green Belt, on the NPPF presumption against development of the Green Belt, on the recommendations of the Oxford Green Belt Study regarding minimising harm to the Green belt, and the Inspector's view that Kidlington's housing need can be addressed without Green Belt review, and to the Local Plan's spatial strategy and objectives.
- If an area based on the Green Belt is selected then the contribution of a site to the purposes of the Green Belt will obviously be a major issue (Historic England).
- Site specific promotions made.

How the identified issues have been taken into account

- Section 6 of the Options Paper sets out the options identified for meeting Oxford's unmet housing needs for which there are nine areas of search being considered.
- A list of identified sites is also provided in Section 6 of the Options Paper.
- Section 6 explains that the starting point is the whole district which falls wholly within the Oxfordshire Housing Market Area.
- The consideration of the areas of search is included in Section 7 of the Options Paper.
- Paragraph 7.29 and 7.30 states that all areas of search should proceed as reasonable options and that options in the Green Belt must be considered to be reasonable due to their proximity to Oxford but noting the national test of 'exceptional circumstances' in order to release land from the Green Belt through a Local Plan.

Key Themes:

Housing

Identifying a Deliverable and Developable Supply of Land

Question 10: Should a specific housing supply be identified for meeting Oxford's needs with its own five year supply of deliverable sites?

YES

- Essential for accountability

- Yes in accordance with the NPPF
- Yes to avoid prejudicing Cherwell's own five year supply. In the event of no 5 year land supply, it would be inappropriate for the unmet need to then be met in areas within a poorer relationship with Oxford.
- Yes, a ring fenced approach should be taken as per South Oxfordshire District Council and the Vale of White Horse for housing growth in Science Vale. In order to operate a ring fence, the homes should be located in as few locations as possible.
- A specific housing supply approach should be followed, and this must be limited to the geographical area of search identified as having a strong relationship with Oxford. Sites close to Oxford have a good prospect of delivery
- Oxford City's need cannot be allowed to influence Cherwell's five year supply. The priority for Cherwell should be meeting its own identified housing needs.
- Failure to distinguish will put all settlements at risk from more development and result in a free for all
- This would enable developments aimed at meeting the distinct housing needs of Oxford and Cherwell District to be effectively monitored
- Yes, given that new specific sites are being identified to meet the need then a specific housing supply calculation is required
- Yes, and met in an area outside of Cherwell.
- Yes, but only for monitoring purposes.

NO

- Examples given of similar situations elsewhere (appeal decisions in Devon and Leicester) where the Inspector has made no argument for disaggregation of housing supply into sub areas.
- Once the apportionment has been agreed, CDC should review its housing target in the Local Plan to reflect the additional need, & there should be a single housing target for Cherwell. The 5 year housing supply calculation would be reviewed and the unmet need would become CDC's responsibility to deliver.
- Both Cherwell's housing need and its proportion of Oxford's unmet need are to be met within Cherwell's administrative boundary and the need figures should be combined and planned comprehensively through a single approach over the Plan period.
- The NPPF does not set out any justification for anything other than a district wide 5 year supply calculation. Housing needs must be met in full across the housing market area. The additional requirement arising from the Duty to Cooperate forms part of the full objectively assessed need and should not be treated differently from other housing need.
- Given that Cherwell lies within the Oxfordshire HMA in its entirety then the delivery of units across the whole of Cherwell District will contribute to meeting Oxford's unmet housing need.
- Cherwell and Oxford's housing needs are not distinct but are overlapping.

- A separate housing land supply figure would delay housing delivery.
- Essential to ensure the land supply calculation is a comprehensive figure
- This would be a simplistic and unrealistic approach to a complex matter
- This would not be appropriate, housing should be delivered on an overall basis
- The partial review period is the same as the plan period (to 2031).
- Overall District delivery level should be increased
- Any split would be artificial and difficult to monitor in terms of the need they are addressing; sites in the District are likely to contribute to both housing needs at a District level and those in the wider Housing Market Area.
- It cannot be known which houses have been occupied by whom.
- Housing need is housing need whether it is Cherwell or Oxford generated; it would not be appropriate to limit occupation of the 3,500 houses to those that have a local/familial/economic link to Oxford.
- One housing market area has been identified. Both authorities form part of the same market area and the need of Oxford is already affecting the availability and affordability of housing in Cherwell District.
- Existing allocations could contribute towards Oxford's unmet housing need and additional sites identified could in fact contribute towards Cherwell need
- Particularly difficult to monitor a split housing supply calculation for windfall sites.
- Would require strict regulations to avoid double counting
- A comprehensive approach is required to support the assessment, planning, funding and delivery of infrastructure.

MAYBE/OTHER

- Even if combined into one housing requirement, it is quite possible that sites will come forward early in the plan period and enable a good supply of deliverable and developable sites (Oxfordshire County Council). Build rates could exceed those identified within the Housing Trajectory of the Local Plan Part 1.
- No specific supply should be identified until a 'need' has been properly demonstrated and all other solutions investigated and found unachievable.
- All of the 15,000 homes required to meet Oxford's unmet housing need should be allocated to a separate Oxford Fringe requirement. The Oxford Fringe should be a geographically defined, cross boundary area around the current boundary of Oxford (across authority boundaries).
- The housing land requirement would be set across the districts, based on a spatial strategy, with a shortfall in one being addressed in the policy areas.
- Conversely another representation considers that this would new additional housing need area 'ghettoise' one particular area around Oxford.
- The formulation of a separate land supply would need to be consistent with the evidence base underlying the SHLAA.

- Oxford is the major employment hub for the whole region; the area of search should include the whole district. The potential for an urban extension to Oxford or new garden village close to Oxford should be examined (accommodating the housing need in one location for ease of infrastructure provision).
- Need additional information to be fully clear on the exact detail of Oxford's unmet need. Also need more information on whether infrastructure costs would be associated with the city council or the district. Cherwell should be flexible at this stage.
- There should be one figure for housing land supply purposes- one higher OAN number including Oxford's unmet need, and Cherwell's housing requirement with a 20% buffer.
- The overall housing target for Cherwell should also be reviewed to ensure it is up to date and spans a 15 year time horizon as per the NPPF.
- Would prefer integrating housing and employment land that is allocated into the approved Cherwell Local Plan in stages.

How the identified issues have been taken into account

- These responses were considered in preparing Section 8 of the Options Paper which sets out the delivery options for meeting Oxford's unmet housing needs including the implications of the five year housing land supply.

Question 11: How could Cherwell ensure that a five year supply for Oxford is managed without the existing Cherwell strategy and its housing requirements being adversely affected?

RING FENCE/DISAGGREGATE etc

- Adopt a ring fenced approach (various including Oxfordshire County Council) and limit it to the area of search or plan area. This would avoid impinging on the existing strategy.
- Example given of the ring fencing of one spatial area in South Oxfordshire.
- A clear separation would avoid a free for all across the district.
- Cherwell should remain in control of its own destiny especially its five year land supply. Essential that Cherwell's own strategy is insulated from the separate needs of Oxford.
- The most important thing is that Cherwell's ability to meet its own five year obligations is not undermined. One combined requirement could make meeting the supply requirements so onerous such that the ability to demonstrate a five year housing land supply cannot be achieved. This puts all settlements at risk from speculative developments.
- A separate, ring fenced approach limited to one geographical area would be complementary to the implementation of the Local Plan Part 1 with its proposed growth and Banbury and Bicester.

- The area of search approach may provide a geographically separate area within which requirements relating to Oxford's unmet need can be applied and an appropriate and separate land supply calculation established.
- The separate monitoring of land supply in relation to Oxford's needs could tie in with the geographical area of the Green Belt as currently this contributes little to meeting housing needs.
- A separate housing land supply calculation will prevent meeting the needs of Oxford from adversely affecting the existing Cherwell strategy.
- Cherwell must ensure that it can demonstrate a five year land supply for both housing needs – Cherwell's and Oxford's unmet needs. This requires a range of sites across the plan period.
- A pragmatic approach to delivering development must be undertaken, there should be no delays to delivering housing whilst the Partial Review progresses.
- To ensure that a five year supply for Oxford can be managed without conflict with the Cherwell strategy, sites would need to be identified as separate to those already allocated

COMBINE INTO ONE HOUSING REQUIREMENT etc

- Once the apportionment has been agreed, CDC should review its housing target in the Local Plan to reflect the additional need, & there would be a single housing target for Cherwell. The 5 year housing supply calculation would be reviewed and the unmet need would become CDC's responsibility to deliver.
- If not combined into one housing delivery target, the integration of new housing and communities will not be satisfactory
- Disaggregation is unrealistic
- By adopting an integrated strategic approach, linked to effective delivery, to meeting both needs.
- Aggregation is required to achieve NPPF objectives to encourage sustainable development to boost housing supply and address current supply failings.
- The urgent need for new housing relating to Oxford City is already affecting Cherwell and the surrounding areas in terms of affordability.
- The point of the Partial Review is to integrate the extra housing provision to become a part of the Cherwell strategy.
- There are no separate housing market areas within Cherwell.

OTHER

- Site promotions made.
- Disagreement with the question
- The potential for an urban extension to Oxford or new garden village close to Oxford should be examined (accommodating the housing need in one location for ease of infrastructure provision). Development in the Bicester area should

be limited for infrastructure reasons (Highways, Power supply and Foul water capacity).

- Alternatively the housing land requirement would be set across districts, based on a spatial strategy, with a shortfall in one being addressed in the policy areas.
- Any increase in the rate of development around Oxford will only worsen the infrastructure situation.
- Duty to cooperate is not obligation to accept housing. Cherwell should say no.
- If an area of search with Oxford City is identified then it should meet Oxford City's need only.
- Only allow development in parts of Oxford's Green Belt with sites close to Oxford prioritised.
- To assist the housing land supply, CDC should allow for flexibility in changes of use from employment to residential. This will reduce pressure on greenfield land. There is sufficient protection of employment land.
- Development should be directed to where the services and infrastructure are
- The Green Belt should be built on and replaced elsewhere
- Consider building on some of the open spaces around Oxford.
- The best strategy is to delay until more detail on the housing need is established. i.e. meeting unmet housing needs should be phased to the final 10 years of the plan.
- Evidence – More evidence required. Cherwell can, through the Oxford Growth Board, determine more objectively the locations within which job growth might occur and therefore where housing will be needed. The implications for five year housing land supply should be carefully considered after the Oxfordshire Growth Board's recommendations in September 2016.
- There should be flexibility to allow for districts to make contributions to the unmet housing need when they have the availability to do so.
- The range in a choice and sizes and types of sites will enable Cherwell to bring sites forward earlier in the plan period to address housing land supply issues. Smaller sites are not subject to long lead in times. The potential to expand upon existing strategic allocations should not be overlooked.
- Given the high level of housing need it is unlikely that the existing Cherwell strategy will be adversely affected by ensuring that there is also a five year housing land supply for Oxford's unmet need.
- It is important that a range of sites receive full and proper consideration, recognising the contribution of smaller sites to the early delivery of homes which address short term housing need in combination with larger strategic/mixed use sites.
- Site specific promotions made.

How the identified issues have been taken into account

- These responses were considered in preparing Section 8 of the Options Paper which sets out the delivery options for meeting Oxford's unmet housing needs including the implications of the five year housing land supply.

Housing Issues

Question 12: Do you have any comments on the housing issues identified above?

- Oxford Brookes University supports the proposals which would provide a partial solution to Oxford's chronic shortage of affordable housing.
- The scale of unmet housing needs still has to be justified.
- Villages that have experienced new housing development recently should not be asked to take any additional housing intended to cover Oxford's needs.
- The NPPF highlights that new housing can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns. This should apply to Oxford.
- New housing will not necessarily meet Oxford's needs; there is already competition for housing stock in the area from commuters to London, Birmingham and places inbetween.
- Transportation infrastructure is already inadequate and more housing can only make it worse.
- There should be more explicit emphasis on access by public transport (Oxfordshire County Council).
- All the housing issues identified in the consultation paper should be taken into account. Planning policies should be based on robust evidence and meet housing needs in full, in a sustainable manner.
- There is no shortage of brownfield sites ripe for development in Oxford.
- It is likely that there will be more vacant retail units in future given changes to shopping patterns which could be used for housing
- There is an increased need for more sheltered housing for older people to free up homes for families. Such developments must be near public transport.
- It is inescapable that locations with good transport links and close to Oxford need to be pursued.
- Affordable housing needs to be planned as part of a balanced mix of housing. The severity and long standing nature of the affordable housing crisis in Oxford, and the impact this has on the local economy, needs to be recognised.
- The shortage of housing in Oxford is constraining its economic potential.
- The Council should pursue Starter Homes alongside the other traditional forms of affordable housing. The unaffordable nature of Oxford is acting as a barrier to the retaining and recruiting of workers.

- Oxford's housing requirements (i.e. mix, tenure) are different from the needs of Cherwell residents. Research quoted on household types in Oxford. It will be a challenge to replicate this range of housing in the more rural environment.
- Particular agreement with the key housing issues for rural areas as identified in the consultation paper.
- There should be no deviation from the Local Plan Part 1.
- Housing need should be met close to where it arises. The housing demand pressures are greatest in Oxford.
- The potential for an urban extension to Oxford or new garden village close to Oxford should be examined (accommodating the housing need in one location for ease of infrastructure provision).
- Conversely, wider areas of the district have good public transport links and high levels of sustainability and warrant consideration for new housing.
- There are infrastructure constraints in the area immediately surrounding Oxford.
- More sustainable settlements elsewhere in the district are less constrained by the Green Belt.
- Category A villages which are the focus for development in the rural areas under the Local Plan Part 1 do not necessarily have capacity to accommodate additional development. This risks undermining the Local Plan strategy.
- A flexible approach should be taken to changes of use from employment to residential use.
- The use of Green Belt land for housing should be avoided. Green Belt land designated to prevent coalescence.
- Avoid a piecemeal approach to development.
- If housing is the issue, focus on housing development and limit employment development.
- The use of the word 'sprawl' is ambiguous and should be avoided, given that well planned extensions to settlements can be designed to cause minimal impact on, and potential enhancement to, the setting of affected settlements.
- Paragraph 5.34 in this section states that the Former RAF Upper Heyford is not situated on an A road, but this does not acknowledge that it is well located for access onto the A43 from the east and the A4260 from the west and therefore the primary highway network for the main part of any journey to Oxford, as well as being in proximity to the rail station at Lower Heyford.
- Site/location promotions made.

How the identified issues have been taken into account

- These issues were considered when developing the draft Vision and Objectives in Section 5 and identifying the areas of search in Section 6 of the Options Paper.

Question 13: Are there any additional issues that Cherwell District Council needs to consider?

- The consideration of issues is heavily focused on existing issues but consideration needs to be given to future issues at the point of adoption of the partial review as well as beyond the plan period, when the need for housing near the Oxford City boundary will be increased.
- All the housing issues identified in the consultation paper should be taken into account. Planning policies should be based on robust evidence and meet housing needs in full, in a sustainable manner.
- If Cherwell is having to accommodate housing for Oxford, a financial contribution should be made towards additional costs incurred in the process and infrastructure
- Residents feel let down by planning/District Councillors.
- CDC should promote design codes and emphasise the importance of making development sites/area attractive in terms of design. An independent design review panel should be created.
- Higher density housing should be provided in the vicinity of transport hubs.
- Provide less expensive/starter housing at higher densities.
- The consultation document makes no reference to Neighbourhood Plans and the potential for the Oxford overspill to render existing plans out of date/undermined.
- More community engagement needed.
- Increase the standard of new development to create exemplar development
- The impacts of the use of greenfield land for housing can be mitigated through efficient use of land, and good design and masterplanning.
- Cherwell and Oxford's housing needs are so different (i.e. in terms of student population) so is it likely that providing housing away from Oxford will actually help to address the housing shortfall in the City?
- The Partial Review must build upon what is good and sound in the adopted Plan. Consistency with the adopted plan should be key.
- Oxford's relationship with London should be considered in terms of the amount of housing required and where it should be accommodated. An increase in out migration from London is already very likely.
- The summary of housing issues does not recognise the transport corridors to which the Kidlington, Yarnton and Begbroke area are related including the railway, canal and A44 as well as the good public transport links.
- The conservation of the historic environment and heritage assets (Historic England).
- Concerns that accommodating additional housing will cause coalescence and cause villages to lose their identity, district wide, but particularly in the south of the District.
- Housing provision should be informed by wider transport issues and the strategy set out in the LTP.

How the identified issues have been taken into account

- These issues were considered when developing the draft Vision and Objectives in Section 5 and identifying the areas of search in Section 6 of the Options Paper.

Housing Objectives

Question 14: What are the specific housing objectives for meeting Oxford's unmet needs within Cherwell that we need to consider?

- CDC should receive funding from Oxford to create the infrastructure required.
- Detailed representation proposing a number of housing objectives including promoting mixed communities, improving affordability, bringing forward new housing in areas with good socio-economic and transport links to Oxford City, and providing sufficient infrastructure.
- Affordability a key issue
- High densities are required
- Flats are appropriate for some housing needs
- Housing mix needs to be appropriate taking Oxford and the relevant areas of Cherwell together, not just replicating the housing mix within Oxford. Housing market in Oxford different to Cherwell.
- The type of housing to be provided can be controlled through planning applications rather than through a separate policy category which reflects Oxford's differing housing needs.
- Housing mix should accord with the findings of the SHMA
- Proximity to (sustainable) transport links
- Proximity to sources of employment
- Proximity to services and facilities
- Disagreement with housing needs figures
- Oxford needs to consider all reasonable options to accommodate its own needs
- Objectives as per the Local Plan Part 1
- Need to ensure that travelling and carbon footprints are kept to a minimum.
- Improve public transport
- New housing should be of exemplar design which integrates well with Oxford, ensures convenient sustainable access to the whole of Oxford, with a balanced housing mix, significant affordable housing, and incorporation of low carbon technologies.
- New housing to meet accessibility standards
- New housing to meet internal space standards
- Include provision for super-fast broadband

- Include provision for vehicle charging points for all new dwellings where parking is provided.
- Housing sites should be well related to Oxford
- Increased commuting to Oxford would result from distributing additional housing and employment across the District.
- Key objectives should focus on not making existing traffic problems worse
- Housing sites should offer opportunities to preserve and enhance key environmental and heritage assets
- Sustainability of location in terms of capacity
- Maintenance of the Green Belt and preventing urban sprawl of Oxford.
- Housing development should provide funds for new services and facilities/improvements to existing.
- Need to not unacceptably affect Cherwell's natural, built and historic environment (Historic England).

How the identified issues have been taken into account

- These issues were considered in preparing Section 5 of the Options Paper which sets out the draft Vision and Objectives for meeting Oxford's unmet housing needs in Cherwell.

Housing Locations

Question 15: What locations should the Council be considering for the identification of strategic housing sites to meet Oxford's unmet needs?

- Full list of sites submitted as representations to the Partial Review consultation is available at Appendix 7.

GENERAL COMMENTS

- Promote the creation of sustainable new communities and avoid dormitory locations.
- Linkages to the growth locations within the adopted strategy (Local Plan Part 1)
- What is meant by strategic sites?
- Sites for the Partial Review should adhere to the Local Plan Part 2's maximum of 99 dwellings. All strategic sites form part of the Local Plan Part 1.
- The Council should not rely on strategic sites of a significant size but should instead distribute growth to distribute impacts.
- Sustainability of the housing location should be considered including its location in the settlement hierarchy

- Locations must accord with the strategy and the settlement hierarchy set out in the Local Plan Part 1.
- Availability (ownership) and deliverability of sites.
- Ability of the local housing market to absorb higher build rates
- The potential for an urban extension to Oxford or new garden village close to Oxford should be examined (accommodating the housing need in one location for ease of infrastructure provision). Development in the Bicester area should be limited for infrastructure reasons (Highways, Power supply and Foul water capacity).
- Suggest locating new housing as far from Oxford as possible to discourage commuting/travelling into Oxford city.
- Conversely, housing need should be accommodated as close as possible to where it arises
- No site should be in an unsustainable location. All should be within easy reach of public transport links which should have adequate parking spaces, or should have physical proximity to Oxford (walking, cycling). Aim should be to reduce the need for travel and to improve air quality.
- Accessibility not just to the centre of Oxford but to a range of locations within Oxford.
- Proximity to employment and provision of employment
- Proximity to existing transport infrastructure including Oxford Parkway station.
- Proximity to Oxford.
- Oxford should look to its own Colleges to supply land for housing within its own boundaries.
- As per sources of evidence which have not yet been completed.
- Wherever adequate infrastructure is available or can be provided. Bus services are not secure.
- Locations must take account of existing infrastructure and capacity for improvements.
- Provision of new infrastructure and facilities
- Sites of low agricultural land value
- Sites with no major constraints for example in terms of flooding
- Constraints in terms of ecology
- Opportunities presented by natural resources i.e. Oxford Canal
- Historic environment constraints
- Growth areas should be identified across the district, focusing on key settlements as identified in the settlement hierarchy. The growth areas should have good links to Oxford City, such as Bicester
- Sites should be adjacent to existing larger settlements
- Sites & locations informed by a review of the Green Belt according to the purposes of including land in Green Belt. Sites/land closest to Oxford should

be prioritised. Conversely, locations should be determined by protection of the Green Belt.

- Sites should be located along transport corridors which have existing, planned or potential fast and frequent public transport services to Oxford City Centre and to key employment locations within the City and locations which would encourage cycling and walking as a mode of travel to and/or within Oxford (Oxfordshire County Council)
- Should take into account safeguarding of sites for minerals resources and infrastructure and waste management infrastructure (Oxfordshire County Council)
- Growth should be directed to the main towns in Cherwell where substantial infrastructure investment is already planned, and to villages with due consideration afforded to their size, service provision and relative connectivity/accessibility to Oxford.
- Banbury and Bicester are already the focus of growth in the Local Plan Part 1 and locating additional development there is not appropriate as they will not be delivered in the short term. Kidlington offers scope for new development. Sites on the edge of the sustainable larger villages can complement the large scale sites allocated in the adopted Local Plan. They are often free from constraints, can be delivered quickly, and without major investment in new infrastructure.
- Locations which would not unacceptably affect the District's natural, built and historic environment.

How the identified issues have been taken into account

- These issues have been considered in preparing Section 6 of the Options Paper which sets out the options identified for meeting Oxford's unmet housing needs including the nine areas of search being considered.
- A list of potential sites is also provided in Section 6 of the Options Paper.
- Sections 6 and 7 explain that the starting point is the whole district which falls wholly within the Oxfordshire Housing Market Area. The Paper explains that it is reasonable to consider the Oxford Green Belt due to its proximity to Oxford.

Transport

Question 16: Are there any transport issues you would like to raise?

- Capacity improvements needed for A43 and improved access to Junction 9 of M40
- Suggest upgrading the A34 and the Oxford ring road to 3 lanes
- There should be improved access from the ringroad to Oxford City at key points i.e. to serve the JR hospital.
- Support for the provision of a new junction on the M40 to the south of Junction 9.

- Sustainable travel could be enhanced by a station on HS2 on A43 between Bicester and Brackley.
- No development should commence until the Oxford-Bicester train line is operational.
- Additional development should be located along the Cambridge-Oxford Expressway.
- Sustainability issues can be addressed via policies in the Local Plan (Pt1 & 2) and SPDs.
- Recent transport improvements i.e. Oxford Parkway have made traffic congestion worse with more people trying to get through Kidlington in rush hour.
- Additional housing will only make Oxford's traffic problems worse.
- Propose introducing congestion charging in Oxford
- Need to promote more and safer cycle routes
- Promote the use of trams in Oxford
- Reinstate rail links from Witney, Thame & Abingdon and rail links between Banbury & Kidlington.
- Some commercial operations at Oxford London airport would support the local economy.
- Do not support distribution hubs at motorway junctions.
- There is a need for public transport improvement across the district including closer working across a range of stakeholders
- Public transport improvements in areas accommodating Oxford's housing overspill must be funded by Oxford
- Relief Road required for Banbury
- Concerns that rail electrification will temporarily increase traffic problems at Banbury
- Additional housing in and around Kidlington will exacerbate traffic problems in Kidlington.
- Additional housing to serve Oxford's employment needs outside of Oxford would worsen commuting pressures.
- New housing development should not take place without improved sustainable transport capacity including improvements to bus networks, improving links between residential areas, key employment, leisure and retail destinations and rail stations.
- It is inevitable that residents of the new housing will commute into Oxford so the focus should be on improving bus & train capacity & parking outside of Oxford.
- Support new Park & Ride sites but do not support moving existing sites away from Oxford. The loss of Water Eaton would be a retrograde step.
- To help reduce commuting, new housing development should be accompanied by employment development.

- To help reduce journeys, new development should be located as close to Oxford as possible
- To alleviate traffic problems it is essential that additional housing is located to allow sustainable access to a range of key facilities and services.
- The area surrounding Oxford gives much better prospects for acceptability and deliverability in transport terms, compared with more remote locations where transport mitigation would be far more costly and would do less to encourage private car use for travel into Oxford and elsewhere.
- Concerns there are no specific clear proposals for transport improvements
- Predicted transport impacts are not based on correct evidence
- Updates to the evidence base documents listed are highlighted i.e. the County Council's Park & Ride Study is now underway; the East West rail connection with Milton Keynes is now due to open from 2019 (Oxfordshire County Council).
- LTP4 requires review in light of the increase in housing numbers
- Not clear how the Partial Review fits with County Council transport strategies.
- Concerns at cuts to bus services
- Transport opportunities should be recognised i.e. at Upper Heyford
- Rail services should be supported over bus services which are too slow and expensive for commuters
- Space needs to be reserved for high quality rapid transit
- The provision of safe, segregated cycle lanes should be designated from the outset.
- There is no reference in the consultation paper to freight and distribution related transport, there is a sole focus on the movement of people and this should not be at the expense of also considering the needs for transport connectivity to enable the movement and storage of goods and materials. There is also a need for sites for such uses.
- Transport infrastructure in and around Bicester is due to be upgraded significantly.
- Good accessibility is essential for staff retention and recruitment
- Dispersed housing at a distance from Oxford, generating car borne trips, will have negative impacts on congestion, carbon and air quality.
- The location of housing at settlements around Oxford could transform the transport accessibility of these settlements including improving the quality and availability of public transport options with potentially a new Park & Ride at Begbroke; facilitating the delivery of Mass Transit on the A44 by increasing the travel demand generated by a fully built out Begbroke Masterplan; a new railway station at Begbroke, and upgrading traffic-free cycle routes into the city centre.
- There should not be reliance on the measures in LTP4 (Bus Rapid Transit system and proposed new Park & Ride sites) coming forward. Even if these do come forward, they are unlikely to substitute the need for new housing to be located close to Oxford.

- Concern about the accuracy of traffic modelling techniques
- Want more information on the proposed transport improvements particularly regarding Junction 10
- Concern at the transport impact of new development (commuting) on towns and rural villages and high levels of traffic through small villages.
- Concern that transport projects are not thought through i.e. Oxford Parkway causing parking problems within the centre of Kidlington by commuters seeking to avoid paying for parking by using free parking in the centre.
- Developer funding should be used to improve amenities for passengers at railway stations particularly at Bicester North and Banbury stations.
- Transport improvements required across the district with Government funding.

How the identified issues have been taken into account

- Transport issues are considered in the Initial Transport Assessment and in the Initial Sustainability Appraisal, October 2016 (PR22 & PR23) and in the consideration of Areas of Search and potential strategic development sites.

Question 17: How do these issues affect the potential development locations to meet Oxford's unmet needs?

- Existing problems on the A40, A34 and A34 highlight the need to plan new development close to existing infrastructure and services in order to reduce the need for travel. Sites in proximity to Oxford City Centre and its associated road and rail network are highly favourable development locations.
- The residents of the new homes will commute into Oxford; it is essential to protect existing residents from the intrusion and pollution of this commute by providing extra bus and train capacity and sufficient extra parking outside Oxford.
- The issues emphasise the need to locate development close to Oxford/Kidlington and sustainable transport infrastructure
- Housing should be built within walking distance of railway stations to connect new residents to employment, education and leisure opportunities within the wider region.
- Where housing is not served by railway stations, new housing should be accompanied by bus links, cycle paths and pedestrian access from houses to stations.
- Should take the opportunities presented to improve public transport services i.e. the critical mass of demand to justify commercial investment in mass transit.
- The root cause of Oxford's unmet need requires careful consideration, and locations and density of dwellings determined
- Kidlington should play a greater part with housing in Bicester limited due to poor transport infrastructure

- Housing pressures at Kidlington cannot be accommodated within the existing boundaries.
- Growth should take place at Bicester as it is far superior in transport terms.
- Growth at Banbury should be limited due to transport constraints.
- Growth should take place at Banbury due to proposed transport improvements and connections with Oxford.
- Locations in the southern half of the district that are well connected by public transport are the most sustainable locations for future development.
- Cycling needs to be made safer which cannot happen while additional traffic is being generated around Oxford.
- The development of 'commuter hubs' with rail facilities should be encouraged
- Conversely too much reliance should not be placed on commuter hubs due to the resulting lack of housing type variety as high density schemes become the main type of development.
- A range of housing types is required.
- There must be clarity on how development would affect access to services for existing residents
- Unless there is a reappraisal of the location of employment developments then Oxford will cease to be an attractive place to do business.
- Although road improvements may be physically possible in some cases, this should not be at the expense of established rural communities.
- The Partial Review will need to take account of the conclusions and recommendations of the Park & Ride Study (Oxfordshire County Council)
- The vision and strategy of the Adopted Local Plan Part 1 should be followed
- Locations in the southern half of the district that are well connected by public transport are the most sustainable locations for future development.
- Support for the measures proposed in LTP4, which should be considered when considering potential development locations.

How the identified issues have been taken into account

- Transport issues are considered in the Initial Transport Assessment and in the Initial Sustainability Appraisal, October 2016 (PR22 & PR23) and in the consideration of Areas of Search and potential strategic development sites.

Infrastructure

Question 18: Are there any infrastructure issues you would like to raise?

- Cherwell's infrastructure is already stressed by the amount of development required in the Local Plan Part 1.
- Infrastructure is located at Banbury, Bicester and Kidlington

- Infrastructure is being provided at Heyford Park which serves the new community and the surrounding settlements
- Existing transport infrastructure provides opportunities for locating housing at sustainable locations (i.e. rail station at Lower Heyford).
- Linkages to employment areas in the south and southeast of the City should be provided i.e. a shuttle bus service between Oxford rail station and those destinations.
- Highways, power supply and foul water capacity infrastructure limited at Bicester
- Bicester is already failing to provide appropriate required infrastructure and the needs of existing local residents are not provided for.
- Growth should be focused in locations such as Bicester, with strong socio-economic links with Oxford City and opportunities to utilise existing infrastructure and capacity to deliver further infrastructure.
- There are major infrastructure constraints at Bicester limiting future development potential.
- Further information is required on allocations for infrastructure providers to comment in detail (Scottish & Southern Energy & Thames Water). Happy to work closely with the Council as the site allocations process progresses (Thames Water).
- Infrastructure, with the exception of transport, can be adapted as necessary
- Traffic congestion is already a problem
- Need to improve road access to Oxford from north of the County.
- New housing estates need the whole range of social and educational infrastructure to minimise car travel
- Concerns that arterial routes and junctions in and around Banbury are at or over their capacity. Requirement for a South East link road.
- Requirement for better transport linkages within Banbury including in and around Tramway and Canalside areas
- Opportunities posed by Bicester Town railway station in terms of links to Oxford.
- Shuttle bus service required between Oxford train station and the science parks and employment areas in the south and southeast of the City.
- A network of easily accessible pedestrian and cycle routes should be developed to encourage non car travel.
- OCC has not sought a primary school at Drayton Lodge Farm (Oxfordshire County Council).
- Concerns regarding primary school capacity in rural areas
- Concerns with flooding and drainage infrastructure as well as water supply
- Important to consider the availability of water recycling infrastructure
- Water supply and water treatment infrastructure concerns particularly in rural areas
- Cherwell District is in an area of water stress (Environment Agency)

- A Water Cycle Study should support the Sustainability Appraisal (Environment Agency)
- Suitable foul drainage capacity/water supply capacity is required to support any additional growth (Environment Agency).
- Electricity supply concerns
- Electricity connections for new developments from existing infrastructure can be provided subject to cost and time-scale. Any upgrades required can be funded between developer and Distribution Network Operator within a 2 year period therefore not impeding delivery of any proposed housing. (Scottish and Southern Energy).
- Overhead power lines on development sites should be accommodated by a considered layout with open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Otherwise, agreement will need to be reached in terms of identifying alternative routing for the circuits prior to planning permission being granted without burdening the existing customer base with any costs arising (Scottish and Southern Energy)..
- Concerns at cuts to bus services
- Requirement for additional burial grounds
- Concerns about mobile phone coverage in rural areas
- Concerns about health care provision in rural areas
- Concerns about local/community policing
- In order for development to be sustainable, it should not exacerbate existing infrastructure problems and demonstrate real improvements to existing infrastructure to be betterment of existing and new residents
- Infrastructure must be located in proximity to new homes to promote sustainable living patterns.
- The likely infrastructure requirements arising from the additional housing should be investigated, as should existing infrastructure/infrastructure shortfalls/capacity for infrastructure expansion. This should consider both Cherwell and Oxford City and should inform the options for growth.
- Lack of confidence that adequate infrastructure will be provided. Onsite infrastructure provision must be addressed at an early stage of plan making.
- Concerns that service sector infrastructure (health/education) struggle to find employees because they find it too expensive to live in Oxford City or travel to it.
- Opportunities for making efficient use of existing infrastructure is essential
- New development should be of a scale to provide for its own local needs. Spreading smaller development sites to meet housing needs would be inappropriate as it would be difficult to deliver new schools, health facilities etc. Conversely the concentration of larger scale developments provides the opportunity for focused delivery of all necessary infrastructure.
- As well as education, health, community infrastructure, there should be a strong policy steer on green infrastructure

- The Partial Review does not appear to consider the impact of increased housing provision on open space, sports and recreation facilities. An up to date playing pitch strategy and built facilities strategy should be produced to ensure the Partial Review is robust.
- There is a lack of sports and leisure infrastructure across Oxfordshire particularly a 'regional' scale facility. A development of around 4,000 homes could enable the delivery of such a facility which would act as a regional attraction, bring visitors into the district, whilst still addressing an unmet need of the County as a whole.
- There is already a need to address a funding gap for strategic infrastructure required to support planning growth. Options for meeting Oxford's unmet need should not significantly increase the infrastructure funding shortfall (Oxfordshire County Council).
- Impacts on existing infrastructure must be thoroughly assessed and careful consideration given to the phasing of new infrastructure with development. The planning and delivery of infrastructure requires a comprehensive approach to planning for growth i.e. rather than developing a separate housing requirement and strategy for accommodating Oxford's unmet need (Oxfordshire County Council).
- Concerns that existing infrastructure deficiencies will not be addressed by new development. No confidence that proposed improvements will be delivered (Thames Water)
- An infrastructure delivery vehicle is required
- Suggest delaying work on the Council's CIL (Regulation 123 list) until after the unmet needs of Oxford have been allocated to ensure a more accurate list can be produced.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Question 19: How do these issues affect the potential development locations to meet Oxford's unmet needs?

- In general water supply terms there are no major concerns about supporting an additional 3,500 properties. The preference would be for additional growth to be focused in either Banbury or Kidlington and to a lesser extent Bicester (Thames Water)
- Thames Water is currently delivering a reinforcement main to Banbury to secure supplies to the area for the next 40 years. Local reinforcements may still be required, and the storage capacity of the Bretch Hill reservoir will need to be reviewed. In terms of waste water at Banbury, there is an existing scheme being design to relieve existing pressures on sewer network capacity and to prevent sewage flooding (Thames Water).

- Kidlington has adequate strategic water supply infrastructure and any proposed development in this area would only require local reinforcements (Thames Water).
- If growth is greater than previously predicted for Bicester, additional water supply upgrades may be required and the capacity of the Ardley reservoirs reviewed. Upgrades to the existing sewerage infrastructure and drainage infrastructure are likely to be required (Thames Water).
- Additional housing in the rural areas will require a case by case review in terms of water supply capacity. If any strategic upgrades are required, these could take significant time to implement due to the distances involved in the networks (Thames Water).
- At the Former RAF Upper Heyford, both sewerage network and waste water treatment capacity will need to be upgraded to cater for the scale of development envisaged. A strategic wastewater infrastructure solution will be required to serve the scale of development proposed (Thames Water).
- Careful consideration should be given to the phasing of new infrastructure with development (Oxfordshire County Council).
- Infrastructure must be located in proximity to new homes to promote sustainable living patterns.
- Lack of infrastructure provision will limit growth
- Infrastructure must be provided before development commences
- Infrastructure, with the exception of transport, can be adapted as necessary
- Consideration should be given to spatial options which can take advantage of planned investment in strategic infrastructure, or which might strengthen the business case for new or improved strategic infrastructure (Oxfordshire County Council)
- Development should either be located where existing services/infrastructure would benefit from additional population, or where infrastructure could be expanded cost effectively, or clustered in such a way as to make the creation of new infrastructure viable.
- Employment development locations should be sited to ensure that there is affordable access to them
- Locating significant additional growth in the District will make existing infrastructure problems worse
- Locations for growth should be selected which take advantage of existing and planned investment in strategic infrastructure or which might strengthen the business case for new or improved strategic infrastructure
- The ability to provide infrastructure onsite as well as links to existing infrastructure should be considered
- An infrastructure delivery vehicle is required to deliver future development quickly and efficiently.
- The most appropriate locations are Bicester and Banbury, in accordance with the vision and spatial strategy of the Local Plan Part 1. This will ensure that Cherwell has a clear vision, rather than creating a different vision for the delivery of the additional housing which would conflict with the aims of the Local Plan Part 1 and also confuse matters.

- Growth should be focused in locations such as Bicester, with strong socio-economic links with Oxford City and opportunities to utilise existing infrastructure and capacity to deliver further infrastructure.
- Bicester is receiving funding associated with the Eco Town and Garden Town designations and is therefore able to accommodate additional development.
- Bicester is the most appropriate when considered against the reasonable alternatives.
- Additional growth in Bicester should be limited by the capacity of the rail and road infrastructure linking it to Oxford, and other infrastructure required to support housing.
- The infrastructure capacity at Banbury is uncertain
- In comparison with other settlements in the District, Banbury contains the infrastructure to support development
- Kidlington will offer the best solution given the factors listed in the consultation document's section on infrastructure, having significant services and facilities
- Existing infrastructure provision at Oxford is a strong positive factor in considering options for growth, particularly in the north of Oxford area.
- Growth locations should be in the south of the county and closer to Oxford and the knowledge spine
- Site specific promotions made

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Transport Assessment's (PR22) and Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Economy

Question 20: Are there any economic issues you would like to raise?

- Full list of sites submitted as representations to the Partial Review consultation is attached.
- Employment development should be located next to transport hubs & should consist of different uses.
- Tourism should be promoted.
- Tourism is a key part of Cherwell's economy, particularly associated with Bicester Village. Through integrating Bicester town centre with Bicester Village, Bicester will be able to harness the status that Bicester Village has brought to the area and tourism will become a greater element of the District's economy. As such the existing tourism assets of Cherwell should be supported.
- The waste management industry is not adequately accommodated in Oxford.
- A thriving local economy does not need to be synonymous with more people, more traffic and more housing.

- It should be recognised that as well as being the economic centre of the County, the Oxford economy is of national and international significance.
- The diversity of employment types in Oxford should be more clearly recognised including manual based work (BMW & Unipart).
- Concerns raised about the economic impact of providing housing which is supposed to help alleviate Oxford's shortfall in locations that are not well related to Oxford or its employment hubs.
- Additional housing is intended to house workers based in Oxford so it is important that housing sites are located along established or proposed public transport corridors. References made to additional documents for the Partial Review to consider (Oxfordshire Creative Cultural Heritage and Tourism Investment Plan (Oxfordshire County Council)).
- Housing and economic issues are closely linked; the Partial Review should consider both.
- It needs to be ensured that job growth in Bicester matches housing growth. There is no mention made of the role of the Eco Business Centre in supporting environmental business growth.
- Bicester needs high tech/high skills employment commensurate with the Oxfordshire Knowledge Spine rather than warehousing.
- In Banbury there is a need to increase skills (not necessarily academic achievement) including vocational/apprenticeship training.
- Banbury needs smaller high tech industries not only manufacturing jobs.
- Upper Heyford is a major employment location and can be utilised to create a dynamic third major settlement in the District
- Acknowledgement should be given to the Knowledge Spine. Concentrating development along the knowledge spine will help to secure the economic growth aspirations of the City Deal as well as meeting the needs of residents of the additional housing.
- The lack of affordable housing to workers in Oxford is a drag on the economic development of the City and the County (recruitment and retention problems particularly in key local services as well as the universities and associated research industries).
- Oxford Gateway will increase the housing pressures, it is indicative of the lack of balance between housing and employment uses.
- It may be difficult to limit Oxford's future growth.
- The housing needs are based on aspirational projections of Oxford's housing employment growth
- If Oxford is restricted in its ability to expand its boundaries then eventually it will cease to be an attractive investment opportunity and economic growth will be constrained.
- Issues identified for the Partial Review should involve scoping the cooperation between Cherwell and Oxford City regarding strategic employment sites considered alongside accommodating housing needs.
- The issue of accommodating strategic large scale logistics sites should be addressed in the Partial Review; the partial review provides a logical

opportunity to broaden the debate to include employment land issues. Delaying would be unsound.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Question 21: How do these issues affect the potential development locations to meet Oxford's unmet needs?

- There is a need to provide additional land for employment as well as for housing.
- New housing should be located near to where employment exists/could be expanded.
- Economic growth can be supported by locating housing in the right place where trips can be made by sustainable modes.
- In terms of acknowledging the role of the waste business sector in Oxford, this means requiring appropriate sites (B2 use) close to Oxford.
- No evidence that if the additional housing is built, whether residents would actually work in Oxford
- Firms in Oxford should relocate to Cherwell to occupy vacant buildings.
- Economic considerations include viability, land ownership, and capturing value uplift to help fund infrastructure. Any site that is identified should be deliverable.
- The Local Plan Part 1 over allocates employment land which should now be used for housing to avoid new large greenfield housing allocations on the edge of towns.
- Employment allocations should be flexible in the uses they accommodate and they should be reviewed to assess their potential to contribute to housing land supply.
- Employment land is not needed (the area is one of full employment); more employment land will increase the need for housing.
- The contributions that any allocated site can make to increasing spend in the local economy, to easing housing affordability, and enhancing public transport viability, should be considered.
- The Council should use the association and relationship with the city of Oxford to help grow Cherwell's economy. This can be accelerated through a greater provision of employment. This would allow for a range of companies to base in Cherwell, potentially attracting Oxford habitants.
- Accommodating the infrastructure required to support the housing and business development will require support funding from the Government and County Council which is unlikely to be available due to finance cuts.

- Development locations should be remote from Oxford to avoid exacerbating Oxford's traffic problems
- Proximity to Oxford is important as the main economic centre of the County.
- Locating new housing close to Oxford will reduce travel distances and limit negative impacts on economic efficiencies and output/productivity.
- Locating significant new housing close to Oxford is vital to support Oxford's long term economic well-being and competitiveness. It is also vital to provide housing for key workers etc to sustain the world class clinical and research activities
- Locating new housing immediately north of Oxford would support significant proposed economic growth at existing sites to the north of Oxford, to the benefit of Cherwell and Oxford's spatial strategies.
- The City needs to expand its boundaries
- It needs to be ensured that job growth in Bicester matches housing growth. There is no mention made of the role of the Eco Business Centre in supporting environmental business growth.
- In order to provide for a balance between housing and employment, land should be allocated for additional employment, preferably in locations that support other sustainability objectives, such as in Bicester.
- Cherwell should be aiming to support Bicester (and Cherwell's) residents, not Oxford's future residents.
- At Banbury, there should be a diversification of the town's economic base and for current and future residents to live and work sustainably within the town.
- Reflecting existing commuting patterns, Banbury has a strong economic relationship with Oxford and would be an appropriate location to accommodate the additional housing.
- Site promotions made.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Transport Assessment's (PR22) and Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Sustainability

Question 22: Are there any sustainability issues you would like to raise?

- Sustainability is a key principle in determining growth locations (Oxfordshire County Council).
- The approach to sustainability in the Partial Review should reflect the NPPF in terms of the broad consideration of a range of issues within the three dimensions of sustainable development. The delivery of housing to meet the

needs of present and future generations is a key part of sustainable development & underpins soundness.

- The conservation and enhancement of the historic environment is an integral part of sustainable development as defined in the NPPF (Historic England).
- Sustainable travel could be enhanced by a station on HS2 on A43 between Bicester and Brackley. No development should commence until the Oxford-Bicester train line is operational. Additional development should be located along the Cambridge-Oxford Expressway. Other sustainability issues can be addressed via policies in the Local Plan (Pt1 & 2) and SPDs.
- Highly efficient houses close to where the housing need arises will provide sustainability
- The additional housing will undermine sustainability through strains on infrastructure and environment. Additional housing is inherently unsustainable.
- It is unsustainable (as per the NPPF) to release Green Belt or AONB land for housing. This removes a benefit from future generations which they otherwise would have enjoyed.
- It is unsustainable to locate housing far from Oxford in North Oxfordshire villages and towns as this would increase commuting. Support staff in hospitals and other vital services need to live close to the workplace, as do all lower paid workers and shift workers.
- Oxford's sustainability standards should apply to the Oxford related housing.
- Support for high sustainability standards, references to Healthy New Towns.
- Examples given of unsustainable development in Bicester (biodiversity concerns)
- Existing roads around Banbury are considered inadequate for current housing needs with insufficient parking provided
- Heyford Park is being developed as a sustainable development and community and this should be expanded upon.
- The Local Plan Part 1 seeks to avoid coalescence between settlements; and further residential development between Kidlington and Oxford would be contrary to this objective.
- The provision of infrastructure is essential to deliver sustainable development.
- The Council should explore eco-friendly transport methods whilst also promoting public transport services, encouraging cycling, introducing road pricing, and building good (not bus) public transport links.
- More housing and more people will add to more air and noise pollution, road congestion, and loss of open countryside and rural areas.
- Need to consider issues of community identity, reducing crime, increasing social cohesion and harmony. Recent developments around Kidlington and Gosford are threatening the appeal of the villages.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Transport Assessment's (PR22) and Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Question 23: How do these issues affect the potential development locations to meet Oxford's unmet needs?

- The need to conserve and enhance the significance of heritage assets and their settings should be considered, both as a constraint and an opportunity (Historic England).
- There is a need to tackle sustainability issues. Otherwise, additional housing should be a long way from Oxford.
- New housing should be spatially closely related to Oxford.
- A sustainable urban extension to Oxford, and development in the southern areas of the District in proximity to Oxford, offers the greatest opportunity for sustainable modes of travel.
- There is scope for mitigation if additional development is located close to Oxford.
- The City needs to expand its boundaries
- Development in designated areas such as Green Belt and AONB should be avoided
- There needs to be more certainty that the housing need is real and that it has to be met in Cherwell
- Cherwell should be aiming to support Bicester's and Cherwell's residents, not future Oxford's residents
- Better management required of the relationships between road users and other users of the space particularly residents, users of open spaces/play areas. Need to reduce the amount of straight roads in new developments and use more 'sleeping policemen'.
- The release of greenfield land for housing should not be seen as an unsustainable approach. Natural environment assets should be protected and where protection is not possible, impacts mitigated, but there are areas of greenfield land that are not protected assets.
- Onsite sustainability standards should not be restrictive or unnecessary as this can lead to long delays/non delivery.
- The Local Plan Part 1 strategy to control development in the open countryside should be adhered to and such proposals rejected.
- European examples given of considering sustainability issues in a unified way along with economic issues and financial viability.
- Sustainability is not just about the environmental aspects. All economic, social and environmental factors carry equal weight and should be considered through Sustainability Appraisal to pursue the most appropriate strategy.

- The key sustainability issue of air quality relates primarily to transport, which in turn is directly influenced by the location of development to achieve a modal shift away from the car.
- Bicester is a sustainable location for more development.
- Banbury is a sustainable location for more development, where the need to travel can be minimised and the use of sustainable travel options can be encouraged.
- Locating the growth in larger settlements such as Kidlington will ensure that residents have good access to a range of facilities without the need to travel.
- There is the opportunity to join up the two issues of accommodating Oxford's unmet housing needs, and accommodating Oxford's overflow business needs within Kidlington's hinterland by developing sites at Kidlington.
- Site specific promotions made and the sustainability credentials emphasised.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Transport Assessment's (PR22) and Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Natural Environment

Question 24: Are there any natural environment issues you would like to raise?

- Additional housing and traffic will damage the natural environment and generate air pollution.
- Need to protect the countryside for its amenity and biodiversity value and value to existing and future generations.
- Should protect flood plain to reduce flooding & designate & protect green spaces
- Areas close to Oxford are at risk of flooding (and across the district), which will be exacerbated by increased surface water run-off.
- Flooding could be alleviated by better undergrowth control and dredging of the Rivers Ray & Cherwell
- Flood risk areas should be avoided as per the NPPF. Cherwell District has significant areas of land at the lowest risk of flooding (Flood Zone 1) and there is no reason to allocate any additional housing in Flood Zones 2 or 3 (Environment Agency).
- CIL and New Homes Bonus should be used to provide funding for flood defence schemes in the areas downstream of large developments.
- The District is in an area of water stress, which will be exacerbated by additional development.
- The Oxford Meadows SAC should be protected.

- All potential allocations should be subject to ecological assessment to ensure there will be no significant negative impacts on biodiversity in accordance with policy ESD 10.
- The cumulative ecological impact of the additional development, including any development along the District's boundaries, should be considered for sensitive receptors particularly in terms of impacts on the SAC but also SSSIs and Local Wildlife Sites (various including Oxfordshire County Council). Direct and indirect impacts (including hydrology, air quality and recreational pressure) should be assessed.
- Conservation Target Areas and other Green Infrastructure linkages should be maintained/protected (various including Oxfordshire County Council).
- Minimise disturbance to nature conservation sites and areas including SSSIs and BBOWT nature reserves, habitats and species.
- The principles of the Oxford City policies on biodiversity should be applied to the new housing being planned for.
- Need to protect the biological value of water meadows and other environmental habitats.
- The Council should designate additional nature reserves and designated green spaces which must not be developed.
- Development should be restricted to areas of low value environmental importance
- Green Belt is a major component of the District's natural capital.
- Green Belt is not a natural environment constraint but relates to the setting of Oxford.
- Green Belt land is a high quality landscape which is also important for farming and wildlife habitats, where a network of footpaths serves as a recreational facility.
- The Green Belt is not sacrosanct; it should not be protected at the expense of other spaces within the District.
- Consideration required of the impact on the District's rural character of house building.
- More could be done to promote recreational use of Cherwell's countryside including improving footpaths.
- Need to tackle littering in the countryside.
- There is a need for appropriate planting on development sites in terms of appropriate location and limited ongoing maintenance particularly with maintenance budgets shrinking.
- As per the NPPF guidance in paragraphs 109 to 125 and paragraph 113's distinction between the hierarchy of protected sites. Landscape designations outside of those specifically mentioned in the NPPF footnote 9 are not absolute constraints.
- Development should be accommodated without impacting on the Cotswolds AONB (Natural England).
- Consideration should be given to the natural environment constraints in the local authorities around Oxford. CDC could accommodate a higher level of

housing than other Oxfordshire authorities as it has a lower amount of Green Belt. Areas with strong socio-economic links with Oxford City should be the focus for growth areas.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Question 25: How do these issues affect the potential development locations to meet Oxford's unmet needs?

- Impacts on the natural environment should be taken into account.
- A balanced view should be taken between environmental constraints and the need for development.
- The large areas of land close to Oxford are protected by natural environment designations means that there are only limited development locations to meet Oxford's unmet need. The least restricted areas are Green Belt, which are not subject to natural environment restriction.
- Some areas will be 'no go's' for development and development should be directed to locations which minimise the loss of important and valued natural assets/landscapes.
- Oxford City is unable to meet its housing need because of policy and environmental constraints, such as flood risk. The same approach should apply in Cherwell i.e. development should not be located in areas of flood risk (Flood Zone 2 or 3) or nature conservation value (Environment Agency).
- Less housing will mean less litter
- Consideration should be given to the natural environment constraints. CDC could accommodate a higher level of housing than other Oxfordshire authorities. It has a lower amount of Green Belt and fewer natural environment constraints. Areas with strong socio-economic links with Oxford City should be the focus for growth areas.
- There is scope for mitigation if additional development is located close to Oxford.
- Development should not be at the expense of Cherwell's natural environment whilst allowing Oxford to protect its areas that may be of lesser environmental importance.
- Realistic reappraisal of the Green Belt is required.
- Housing opportunities around Kidlington are limited by flood risk.
- There is some flood plain land north of Oxford, but there is also much land outside of the flood plain.
- The Oxford Meadows SAC is already compromised by traffic. Additional housing close to Oxford could help to alleviate this when compared with other alternatives more likely to generate additional traffic on the A34.

- The area around the Oxford Meadows SAC is particularly sensitive with development potentially leading to changes in hydrology, increases in air pollution, or recreational pressure on the site.
- The issue of cumulative impact on the SAC could affect locations for growth particularly in terms of the air pollution generated by additional traffic (Oxfordshire County Council)
- Options for growth in the more rural areas away from Oxford are likely to have a greater impact on the character of the open countryside.
- Cherwell should be aiming to support Bicester's and Cherwell's residents, not future residents of Oxford.
- Site specific promotions made.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Built and Historic Environment

Question 26: Are there any built and historic environment issues you would like to raise?

- Updates required to the number of Scheduled Ancient Monuments, Registered Parks & Gardens, and non-designated archaeological heritage assets (Oxfordshire County Council)
- The District's traditional rural villages and rural agricultural landscapes are already threatened by the amount of development required.
- Recent development around Cherwell's villages has damaged local distinctiveness and rural nature of approaches to the village/local views.
- Development as part of the Local Plan Part 1 has already had a substantial and detrimental effect on Banbury's attractiveness as a historic market town, including impacts on Salt Way, Crouch Hill and Banbury Circular Walk, and increasing coalescence. Development has also compromised the historic integrity and tourism potential of the former RAF Upper Heyford.
- Additional development threatens the integrity of the built and historic environment and heritage assets.
- Little value to the built environment in Cherwell in central towns, with some exceptions as noted in the consultation paper.
- Kidlington has a historic centre, recognised by the Conservation Area designation.
- There is potential for careful redevelopment in the urban areas of Bicester or Kidlington.

- A key issue is the protection and enhancement of the historic setting of the City, which is particularly relevant to the areas of open countryside around Oxford i.e. green wedges/green lungs.
- The rural character of the landscape immediately surrounding Oxford is an asset
- Internationally renowned sites within Oxford must be protected.
- Views into and over the city, including those identified in the Oxford Viewcones Study, contribute to the significance of the city and that significance.
- Evidence base sources suggested include the Historic Environment Record & the Historic Landscape Characterisation
- Developments of over 10 houses should not be located in or next to Conservation Areas
- Factual updates to the number of historic assets in the District as listed in the consultation paper.
- CDC should have a positive strategy for the conservation & enjoyment of the historic environment as per the NPPF. New development should be sympathetic to and complement the built and historic environment of Cherwell District (Historic England).
- Protection of designated and undesignated assets can extend to their settings. A development that affects Heritage Assets should however not be excluded from the site selection process, it should be considered whether harm does arise, whether the harm arises can be mitigated and whether there are reasonable alternatives. Also, heritage assets can in some cases be enhanced by development.
- Need to protect ridge and furrow landscapes.
- The NPPF requires Local Plans to contain a clear strategy for enhancing the built and historic environment and to identify land where development would be inappropriate.
- The possibility of retaining the outer shell of historic buildings and bringing premises back into use should be considered before building new houses.
- Regard should be had to the Statutory List of Buildings of Special Architectural or Historic Interest and Designated Conservation Areas.
- As per the guidance in the NPPF paragraphs 126 to 141, historic assets should not be considered as absolute constraints.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Question 27: How do these issues affect the potential development locations to meet Oxford's unmet needs?

- Impacts on heritage assets should be taken into account including 'showstoppers'
- Development within Conservation Areas or close to other historic assets is acceptable to meet Oxford's needs, provided historic settings are respected.
- Heritage assets should be viewed both as potential constraints and also potential opportunities in terms of securing the future of historic buildings or to better reveal their significance. This should include the contribution of a site to the purpose of the Green belt to preserve the setting and special character of Oxford (Historic England).
- Growth options should take into account the likely impacts on Green Belt purposes but also consider the exceptional circumstances which justify a review of the Green Belt boundary.
- Promote higher density development in Oxford including on specific redevelopment sites.
- CDC should have a positive strategy for the conservation & enjoyment of the historic environment. New development should be sympathetic to and complement the built and historic environment of Cherwell District.
- The issues identified limit future growth and it is necessary to recognise the limits of what can sensibly be achieved.
- New development should be directed to locations which protect and enhance the District's heritage assets.
- There is scope for mitigation if additional development is located close to Oxford.
- No justification to build over historic landscapes/historically sensitive locations and towns, instead of the Green Belt of Oxford.
- Need to improve the attractiveness of Bicester in its own right to alleviate Oxford's traffic problems
- Further developments around Banbury would threaten the separate identities of the surrounding villages. There are far more sustainable locations for growth which are within shorter travelling distance of the City and which have fewer constraints and where built development has already impacted upon character.
- Further development at RAF Upper Heyford would erode its remaining Cold War ambiance.
- Site specific promotions made.

How the identified issues have been taken into account

- The issues were considered when developing the draft Vision and Objectives in Section 5 and through the Initial Sustainability Appraisal's (PR23) examination of Areas of Search and potential strategic development sites.

Call for Sites

Question 28: Do you wish to submit details of sites to deliver housing development to meet Oxford's unmet housing needs within Cherwell?

- Full list of sites submitted as representations to the Partial Review consultation is available at Appendix 7.
- Cross reference made to sites proposed as part of representations on the Local Plan Part 2 consultation.

How the identified issues have been taken into account

- Promoted sites that meet the minimum size criterion for considering strategic development (two hectares) in order to identify sites that potentially could accommodate at least 100 homes are identified in Section 6 of the Options Paper.

General Comments

- No reference is made specifically to Parish Meetings. Where a meeting is in place, everybody on the electoral roll is a member and PMs are therefore the most democratic form of government. PMs are often confused with Parish Councils which have different legislation.
- Oxford City Council, South of Oxfordshire & Vale of White Horse District Councils and other Duty to Cooperate bodies look forward to continuing to work positively with Cherwell District Council and the other Oxfordshire authorities to assist with post SHMA work programme for the Oxfordshire Growth Board.
- Support for the building of individual houses in small rural communities on carefully chosen sites to support the sustainability of the community.
- No building supported in some villages.
- There is a need to have regard to potential impacts on the historic environment when considering potential housing sites. This includes the impacts of any sites proposed in the Oxford Green Belt on its function to preserve the setting and special character of Oxford. Policies should be based on an adequate, up to date and relevant evidence based as regards the historic environment. Links to information on heritage assets provided. Historic Environment would be pleased to offer comments on potential sites in terms of the impact on the significance of designated heritage assets (Historic England)

How the identified issues have been taken into account

- Reflected in work since the issues consultation and in the Options Paper.
- Issues are considered by the Initial Sustainability Appraisal (PR23) and Interim Transport Assessment (PR22) as described in Section 7 of the Options Paper.

Town and Parish Council/Meeting Workshops

- 3.21 Town and Parish Councils/Meetings were invited to a consultation workshop as part of the issues consultation on the Cherwell Local Plan Part 2 and the Partial Review of the Cherwell Local Plan Part 1 during January – March 2016. Consultation on the Community Infrastructure Levy was also highlighted at the workshop although this was not the focus of the workshops. The workshops took the form of group discussions on the agenda items set out below (the agenda was circulated in advance to the parishes). On arrival, parishes were split into groups and each group discussed each agenda item. The group discussions were facilitated by a member of the Planning Policy Team with support from other officers.
- 3.22 Two workshops took place for parishes in the north and south of the district on 23 and 24 February respectively. The issues arising from the workshops insofar as they relate to the Partial Review of the Local Plan are summarised below.

23 February 2016

Table 1

- Concerns that the Green Belt in Cherwell should be protected
- The focus for new development should be in the south of the district where there are better transportation links, although this will depend on site availability
- Roads in the south of the district can better accommodate HGVs
- Jobs already existing Oxford so no employment should be provided.
- Employment provision would cause additional issues (mainly in relation to transport)
- There is a lack of thought in planning in general (i.e. layout of M40) although there was some positive discussion of recent transport improvements
- Concerns about additional housing and impacts on village coalescence

Table 2

- Development should be located at Kidlington or Bicester and it would not be sensible to locate development in the north of the district so far from Oxford.
- Upper Heyford former airbase was raised as an option.
- Infrastructure should be provided as well as dwellings and transport will be a major consideration.
- The Green Belt should be protected and more sites should be considered in Oxford but the importance of the skyline should be recognised.

Table 3

- Need more information on why Cherwell needs to accommodate Oxford's needs.
- Obvious opportunities for accommodating Oxford's needs that are not in Cherwell i.e. Grenoble Road.

- If Oxford didn't keep attracting new employment growth, then there would be ample land supply for housing within the City boundaries – they can redress the balance within their own area.
- Query whether the housing is actually for people who will join the Oxford/south of Cherwell community – it is for London commuters or Birmingham commuters.
- A 'hierarchy' of preferred responses was discussed: Firstly – not accepted that there is an unmet housing need, either that Oxford cannot meet its own needs or that Cherwell should be accepted this. Secondly – any provision in Cherwell to meet Oxford needs should be as close to Oxford as possible, well linked in transport terms. Kidlington is an obvious candidate given size of settlement, ability to accommodate development and links to Oxford. New train station linking to Oxford & beyond. Thirdly – development in the Green Belt, as long as there is replacement Green Belt designation elsewhere i.e. no overall loss in quantity.
- All agreed that Green Belt itself is not sacrosanct; it can be replaced elsewhere (not like a wildlife designation for example).
- Area of Search should be in the south of the district.
- No implications for 5 year housing supply in the rest of the district, there should be a north of Cherwell 5 year supply calculation, and a south of Cherwell 5 year supply calculation.

Table 4

- Houses to meet Oxford's housing need should be located where people want to buy them
- Development should be located close to Oxford but there are constraints e.g. biodiversity
- The need should be met in Oxford
- Green Belt land should be used to ensure development is close to Oxford
- Concern at even more development in the district to meet Oxford's unmet need- where does it stop?

Table 5

- Apprehensive about how the excess Oxford city demand would be divided up per village
- Should the villages closer to Oxford take proportionately more
- Would the housing need of Oxford's overflow displace Cherwell's own housing need
- Where possible, should concentrate new development around the Transport Hubs
- Concerned about the increase in traffic, and the knock-on effects of developments not just in their villages, but also in nearby villages

24 February 2016

Table 1

- Concern was expressed that the gap between Kidlington and Oxford could be lost and other areas including a site to the south of Oxford would be preferable.
- Oxford is pursuing employment land and won't allow it to be re-developed. This should be examined. There is an opportunity to bring employment from Oxford to Bicester.
- Transport should be a major consideration for the location of development. The railway crossing at London Road will need addressing if there is continued growth at Bicester.
- Bicester is the right location for housing and employment but links need to be improved between Bicester and Oxford.
- Concern was expressed that villages will have to accommodate Oxford's needs.

Table 2

- New infrastructure development is concentrated from Bicester to Kidlington/Oxford; it would make sense for development to be located towards Oxford.
- Better to review the Green Belt for development rather than targeting villages being consumed by towns.
- Loss of Green Belt could be replaced by new Green Belt/buffers around villages.
- Oxford should meet its own needs, including employment.
- There are already problems in Kidlington with the new station; parking at the station and park and ride is causing overspills into the village free parking areas.

Table 3

- Shared view that Oxford should accommodate its own needs, and if it cannot, then the housing should just not be provided, rather than provided elsewhere.
- Wherever the housing is located, if it is meeting Oxford's needs (i.e. to support employment growth in Oxford), then it will increase commuting into Oxford. This is not sustainable development, even if locations close to Oxford are used.
- Want Oxford to look again at its capacity and if necessary use large areas of private green space.
- Would not support Green Belt land being lost to housing development. Concerns that there is already high out commuting in the district i.e. to Oxford and out from Bicester, more housing in the south of the District will worsen this. Why not focus on more jobs in Cherwell.
- Shared concern about impact of accommodating Oxford's housing needs on the Cherwell housing land supply.

Table 4

- Questioned whether or not new areas could be designated as Green Belt if other areas are being removed from the Green Belt in order to meet Oxford's unmet housing need.
- Questioned if a new SHMA will be prepared in light of Oxford's unmet housing need and Oxford's Local Plan Review.
- Questioned if Cherwell is speaking with other Oxfordshire authorities regarding the additional 15,000 dwellings in Oxfordshire.
- Questioned if employment will be considered.
- Parishes agree with the Government's priority on the use of brownfield land before greenfield land
- Raised concerns over the planning process – Cherwell has prepared a new Local Plan which was adopted last year and now seeking changes to the Plan due to changes in circumstances. Communities will lose interest and things could further change.
- Questioned the status of the Garden Town application and the strategy, how will the funding received be used.
- Future residents at the Eco-Town development at Bicester should be encouraged to live and work within the development.

How the identified issues have been taken into account

- The issues raised have been considered in preparing the draft Vision and Objectives, in identifying the Areas of Search and in the initial consideration of Areas of Search and potential strategic development sites.

Meeting with Wolvercote & Cutteslowe, and Summertown & St Margarets Neighbourhood Forums, 2 March 2016

- 3.23 On 2 March 2016, a meeting was held with the two Neighbourhood Forums representing communities in the north of Oxford. An officer from Oxford City Council also attended the meeting.
- 3.24 The purpose of the Partial Review was explained including the background to the Examination of the now adopted Cherwell Local Plan, the Strategic Housing Market Assessment, the Duty to Co-operate, the Oxfordshire Growth Board, and the process of preparing the Partial Review.
- 3.25 Cherwell officers took the Members of the Forums through the Issues consultation paper prompting discussion on the issues raised. The main issues were as follows:
- Relationship between housing needs for housing/economic reasons is confusing

- Concern that more housing will produce more traffic. The impacts will be significant for Oxford wherever the growth is located
- need better cycle links between Oxford and areas to the north of Oxford i.e. Kidlington.
- Air quality is a particular issue and has a direct impact on what can be considered 'sustainable'
- People will commute not just to Oxford but to Birmingham and London
- will the sites being promoted around the edge of Oxford make any difference to the sites being promoted within Oxford?
- There could be coalescence issues around Kidlington
- concern that a strategic approach to meeting the housing need is not being considered (i.e. sites of 3,000 dwellings)
- is the Green Belt still important? Still protected?
- what happens if it is determined that the housing cannot be accommodated in Cherwell?
- Will affordable housing and key worker housing be provided for?

How the identified issues have been taken into account

- The issues raised have been considered in preparing the draft Vision and Objectives, in identifying the Areas of Search and in the initial consideration of Areas of Search and potential strategic development sites.

Appendix 1 – Public Notice



PLANNING POLICY CONSULTATIONS 29 JANUARY 2016 TO 11 MARCH 2016

1. Partial Review of the Cherwell Local Plan (Part 1): Oxford's Unmet Housing Need – Issues Paper

The Cherwell Local Plan Part 1 was adopted in July 2015 and includes plans to fully meet the District's development needs to 2031. Consultation is now being undertaken to inform a partial review of Local Plan Part 1, specifically to help meet Oxford's unmet housing need. An Issues Consultation Paper is being published and comments are invited. The issues paper and related documents, including a Sustainability Appraisal Scoping Report and representation forms, are available to view on line at www.cherwell.gov.uk/policypublicconsultation or at the locations listed.

2. Cherwell Local Plan 2011-2031 (Part 2): Development Management Policies and Sites – Issues Paper

An Issues Consultation Paper is being published for Part 2 of the Cherwell Local Plan. Part 2 will contain more detailed planning policies and smaller, non-strategic development sites for housing, employment, open space and recreation, travelling communities and other land uses. It must conform with and build upon the strategy within the adopted Local Plan Part 1. Comments are invited. The Issues Paper and related documents, including a Sustainability Appraisal Scoping Report and representation forms, are available to view on line at www.cherwell.gov.uk/policypublicconsultation or from the locations listed.

Call for Sites

Both Issues Consultations are accompanied by a "Call for Sites". If you wish to promote a site for development please complete a form at www.cherwell.gov.uk/policypublicconsultation, or request one from the Planning Policy Team at planning.policy@cherwell-dc.gov.uk.

3. Draft Statement of Community Involvement

The Council has revised its Statement of Community Involvement (SCI). The SCI sets out who the Council will engage with on the preparation of Local Development Documents and in carrying out development management, and how and when they will be engaged. The draft SCI is available to view at www.cherwell.gov.uk/policypublicconsultation and your comments are invited as part of this consultation.

Document Locations

On-line at: www.cherwell.gov.uk/policypublicconsultation

Hard copies at the locations below during opening hours:

Cherwell District Council Offices, Bodicote House, Bodicote, Banbury, OX15 4AA
8.45am - 5.15pm Monday –Friday

Banbury Town Council, the Town Hall, Bridge Street, Banbury, OX16 5QB
Monday to Thursday 9am- 4.45pm, Friday 9am- 4pm

Banbury Library, Marlborough Road, Banbury, OX16 5DB
Monday 9am – 1pm, Tuesday 9am-7pm, Wednesday 9am – 8pm, Thurs and Friday 9am – 7pm, Saturday 9am – 4.30pm, closed Sunday

Neithrop Library, Community Centre, Woodgreen Avenue, Banbury, OX16 0AT
Monday 10am – 7pm, Tuesday Closed, Wednesday 2pm – 5pm, Thursday 10am – 1pm, Friday 10am- 5pm, Saturday 9.30am – 1pm, closed Sunday

Bicester Town Council, The Garth, Launton Road, Bicester, OX26 6PS
Monday – Thursday 9am – 5pm, Friday 9am – 4pm

Bicester Library, Old Place Yard, Bicester, OX26 6AU
Monday 9.30am – 7pm, Tuesday 9.30-5pm, Wednesday and Thursday 9.30am – 7pm, Friday 9.30am – 5pm, Saturday 9am-4.30pm, closed Sunday

Kidlington Library, Ron Groves House, 23 Oxford Road, Kidlington, OX5 2BP
Monday 9.30am – 5pm, Tuesday 9.30am – 7pm, Wednesday 9.30am – 1pm, Thursday 9.30am – 5pm, Friday 9.30am – 7pm, Saturday 9.00am – 4.30pm, closed Sunday

Adderbury Library, Church House, High Street, Adderbury, OX17 3LS
Tuesday: 10 am –12 noon & 3 – 7pm, Thursday: 2pm – 5pm & 6 – 7pm, Friday: 10am – 12 noon & 2 pm – 5pm, Saturday: 9.30 am –1pm, closed Monday, Wednesday & Sunday

Deddington Library, The Old Court House, Horse Fair, Deddington, Oxon. OX15 0SH
Monday 2pm - 5pm, 5.30pm - 7pm, Tuesday Closed Wednesday 9.30am - 1pm, Thursday 2pm - 5pm, 5.30pm - 7pm Friday Closed Saturday 9.30am - 1pm, closed Sunday

Hook Norton Library, High Street, Hook Norton, Banbury, Oxon, OX15 5NH
Monday 2pm - 5pm, 6pm - 7pm, Tuesday Closed, Wednesday 2pm - 5pm, Thursday Closed, Friday 2pm - 5pm, 6pm - 7pm, Saturday 9.30am - 12.30pm, closed Sunday

Copies will be available on the North, Central and West Mobile Library Services.
For details of locations and times of the mobile library visit www.oxfordshire.gov.uk or phone 01865 810240

Banbury LinkPoint, 43 Castle Quay, Banbury, Oxfordshire, OX15 5UW
8.45am (10am Wednesday) to 5.15pm Monday to Friday

Bicester LinkPoint, 38 Market Square, Bicester, Oxfordshire, OX26 6AL
8.45am (10am Wednesday) to 5.15pm Monday to Friday

Kidlington LinkPoint, Exeter Hall, Oxford Road, Kidlington, Oxon, OX5 1AB
8.45am (10am Wednesday) to 5.15pm Monday to Friday

Additional Locations for the Partial Review of Cherwell Local Plan Part 1: Oxford's Unmet Housing Need. Documents are available to view during opening hours:

Oxford City Council, St Aldate's Chambers, 109 St Aldates, Oxford, OX1 1DS
Monday to Thursday 9am-5pm, Friday 9am- 4.30pm

Oxford Central Library, Westgate, Oxford OX1 1DJ
Monday- Thursday 9am- 7pm, Friday and Saturday 9am- 5.30pm

Old Marston Library, Mortimer Hall, Oxford Road, Old Marsden, Oxford, OX3 0PH
Monday Closed, Tuesday 2pm- 5pm, 5.30pm- 7pm, Wednesday Closed, Thursday 2pm- 5pm and 5.30pm- 7pm, Friday 10am- 12pm and 2pm- 5pm, Saturday 9.30am- 12.30pm

Summertown Library, South Parade, Summertown, Oxford, OX27JN Monday 9am- 5.30pm,
Tuesday 9.30am- 7pm, Wednesday Closed, Thursday 9.30am- 7pm, Friday 9.30am- 5.30pm, Saturday 9am- 4.30pm

Submitting Comments

Comments on the Issues Papers, Sustainability Appraisal Scoping Reports, or draft Statement of Community Involvement should be sent to:

By email to planning.policy@cherwell-dc.gov.uk

Or by post to:

Planning Policy Team
Strategic Planning and the Economy
Cherwell District Council
Bodicote House
Bodicote
Banbury, OX15 4AA.

Comments should be received no later than Friday 11 March 2016.

S SMITH, CHIEF EXECUTIVE

Appendix 2 – Consultation summary leaflet

Cherwell Local Plan 2011 – 2031 (Part 1)

Partial Review – Oxford's Unmet Housing Need

your place • your space • your say



Issues Consultation - Summary Leaflet

January 2016

Cherwell

DISTRICT COUNCIL
NORTH OXFORDSHIRE

Cherwell District Council recently adopted the Cherwell Local Plan Part 1 (July 2015) which plans for growth to fully meet Cherwell's development needs to 2031. Consultation is now being undertaken to inform a partial review of the Local Plan Part 1. It relates specifically to addressing the unmet housing needs from Oxford City.

The Cherwell Local Plan 2011-2031 (Part 1) was published in July 2015. It meets Cherwell's identified development needs. It also commits to helping Oxford meet its housing need, in accordance with Government policy and with the findings of the Local Plan 'public examination'. This requires a 'Partial Review' of Local Plan Part 1.

A consultation paper has been prepared outlining the key issues that the Partial Review may need to address.

This leaflet explains some of the key issues and questions asked in the consultation paper. It is only a summary and we recommend that the full consultation paper is read. It can be viewed at: www.cherwell.gov.uk/policypublicconsultation and at Cherwell District Council offices and public libraries

throughout the district, and selected locations in Oxford City (see page 13)

This leaflet includes information on:

- The background to the Partial Review
- The context – for Cherwell District and Oxford City
- The "Area of Search"
- Establishing a vision
- Key themes
- The "Call for Sites"

Some planning terms shown in ***bold italics*** are explained at the end of this booklet.

We would like your views on the issues raised and how we contribute in meeting Oxford's unmet housing need.

Background to the Partial Review

The ***Oxfordshire Strategic Housing Market Assessment*** (2014) indicates that there is a very high level of housing need to be met across the County. The Cherwell Local Plan makes allocations for growth to meet the level of housing need identified for the Cherwell District. The Government's ***National Planning Policy Framework*** and the statutory ***Duty to Cooperate*** require local authorities to work together to meet development requirements which cannot be met within their own areas.

Paragraph B.95 of the Local Plan

Part 1 commits the council to seeking to address the unmet housing needs arising from elsewhere in the ***Oxfordshire Housing Market Area***, particularly Oxford City. A consultation paper has been prepared as part of the early stages of a 'partial review' of the Local Plan 1.

The Partial Review of the Local Plan will effectively be an Addendum to the Local Plan Part 1. The Partial Review will sit alongside the Part 1 document and form part of the statutory Development Plan for the district. It must be supported by robust evidence, thorough community and stakeholder engagement and detailed assessments.



The Partial Review is not a wholesale review of the Local Plan Part 1. The Partial Review focuses specifically on how to accommodate additional housing and associated infrastructure within Cherwell in order to help meet Oxford's housing need.



The Oxfordshire local authorities are working together through the **Oxfordshire Growth Board** to identify how and where the unmet housing need might best be distributed across Oxfordshire.



We are asking for your views on the issues that need to be considered in meeting Oxford's unmet housing need, whether they be environmental, economic or social matters. No sites are being proposed yet although we are inviting the submission of site details for consideration. At this stage we have not determined what size of site might be suitable but promoted sites must be for over 10 dwellings

If you wish to promote a site for consideration please use the Site Submission form available at www.cherwell.gov.uk/policypublicconsultation

The context – Cherwell District and Oxford City

Oxford has a high level of housing need. As a relatively compact, historic city, Oxford has some characteristics which constrain its ability to accommodate new development including the Oxford Green Belt, which encircles and extends into the city, a tightly drawn administrative boundary, flooding, areas of nature conservation, and historic assets.

The Cherwell District adjoins the Oxford City boundary and there are geographic, social, economic and historic relationships between the two.

The Area of Search

We need to consider whether we should define a particular area of the district for meeting Oxford's unmet development needs, for example, based on proximity to Oxford, or key transport corridors. Parts of Cherwell District have a more direct relationship with Oxford for different reasons.

Do you consider that the 'area of search', or plan area, for the Partial Review should be well related to Oxford City?

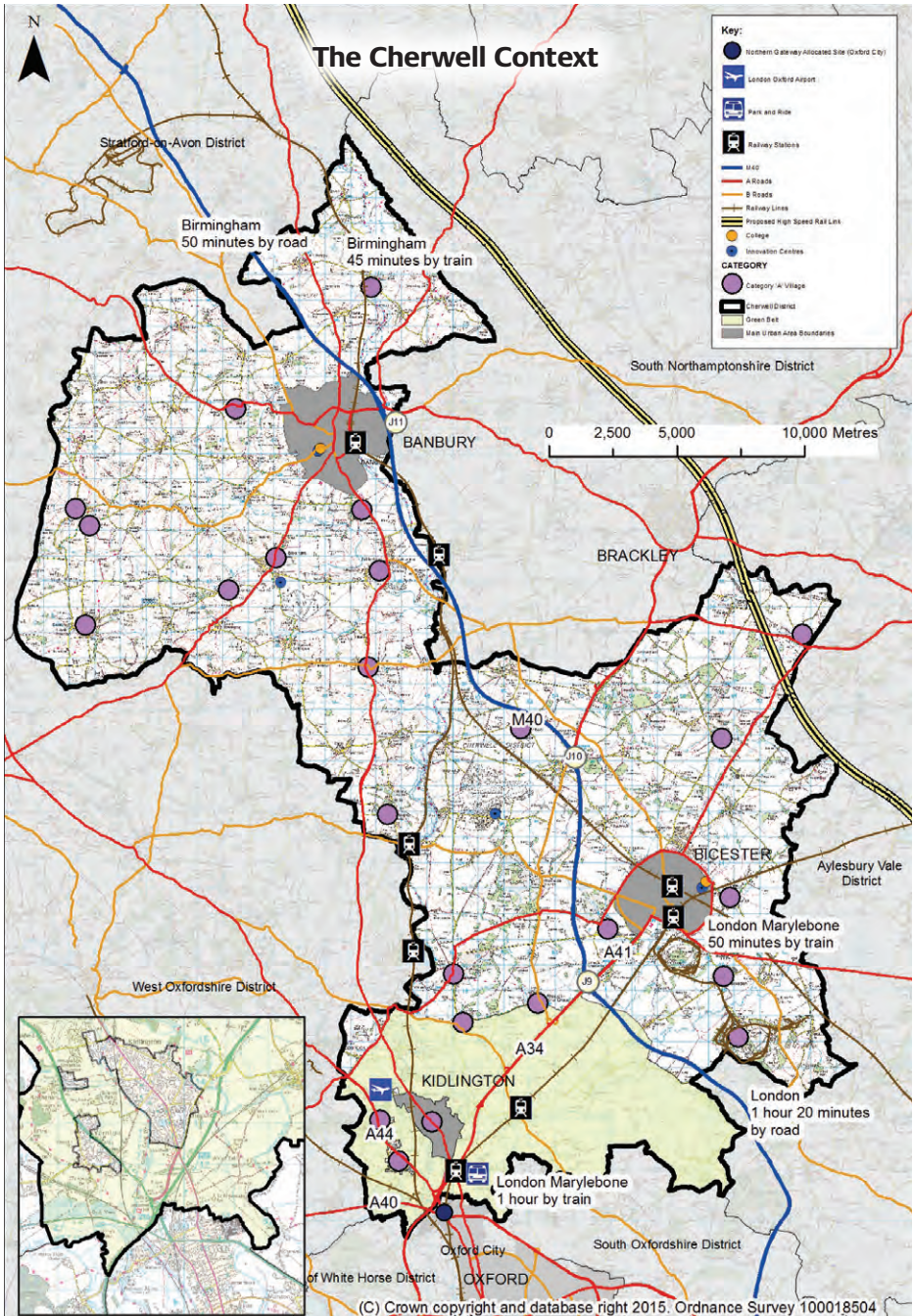
The Oxford Green Belt

The Oxford Green Belt surrounds Oxford City, and covers the southern part of the Cherwell District. It is different from green fields which refer to undeveloped countryside beyond our towns and villages and from 'greenfield land' which refers to all land that has not been previously developed.

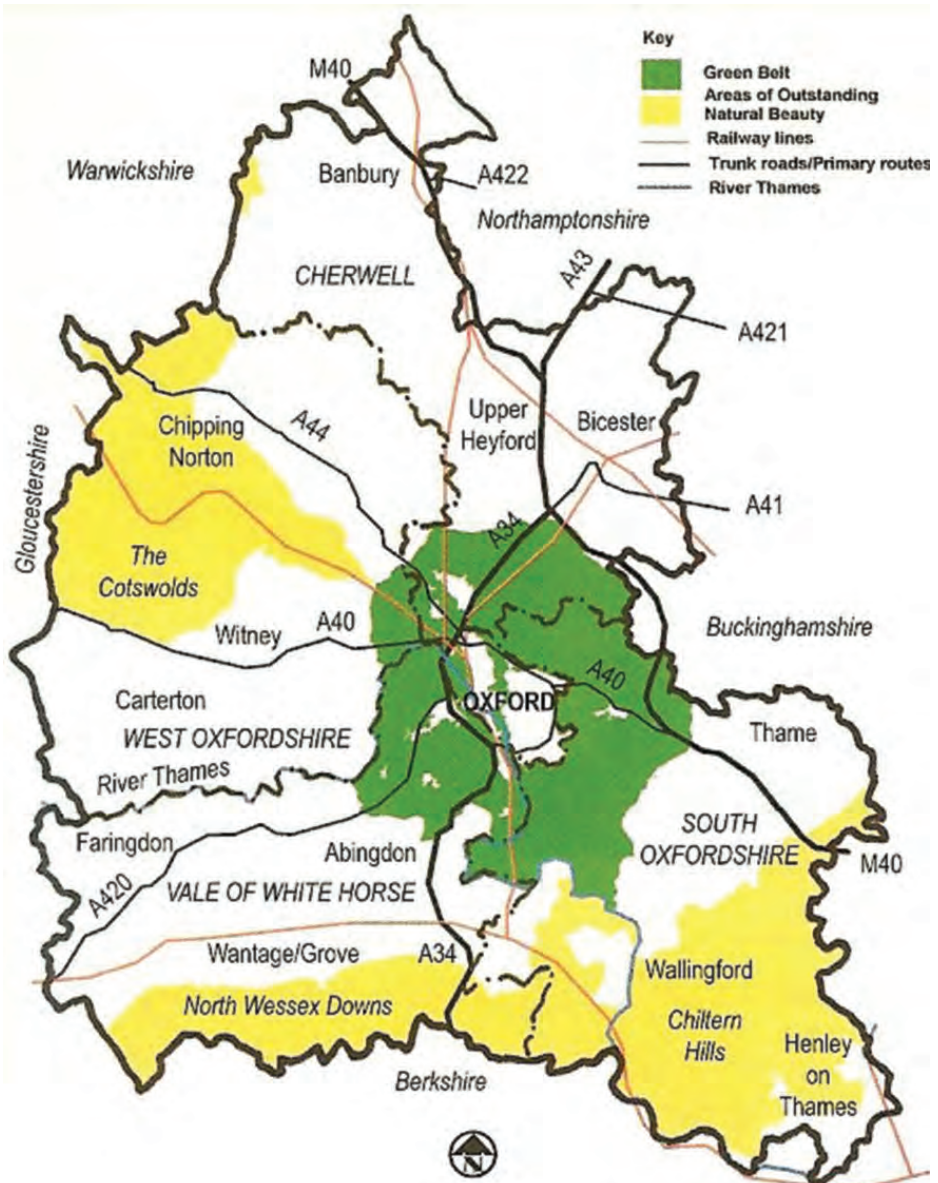
Government policy restricts development in the Green Belt and Green Belt boundaries should only be altered through the Local Plan making process in exceptional circumstances.

A strategic review of the Oxford Green Belt boundaries may be necessary to meet the unmet housing needs in Oxfordshire. A Green Belt Study has been carried out on behalf of the Oxfordshire Growth Board (available on the council's website) and it will be used as one source of information in considering potential locations for growth.





The Oxford Green Belt



Establishing a Vision

By 2031, Cherwell District will be an area where all residents enjoy a good quality of life. It will be more prosperous than it is today. Those who live and work here will be happier, healthier and safer.

The Vision for Cherwell District (above) established in the Local Plan Part 1 must form the starting point for this partial review, but we also need to establish a vision and strategy for meeting Oxford's unmet housing needs in the Cherwell District.

What are the key goals that any additional growth in the District should be aiming to achieve?

What do you think?

Key themes

Housing

How much housing?



The working figure for Oxford's unmet housing need is 15,000 homes (2011-2031). Were these to be distributed evenly across the local authorities this would result in 3,000 homes per authority area. Allowing for some flexibility might suggest approximately 3,500 homes. This remains a working figure until the **Oxfordshire Growth Board** completes its countywide work in Summer 2016. To deliver sustainable development, housing will need to be accompanied by the necessary infrastructure, including services and facilities, and possibly some employment development.

The consultation paper highlights the key housing issues facing both Cherwell District and Oxford City, including housing affordability and a need to provide an appropriate housing mix to meet the different needs of all communities.

Transport



Cherwell District has good transport links and a number of transport improvements have recently been completed including to Junctions 9 & 10 of the M40, to rail transport at Bicester and a new station has recently opened at 'Oxford Parkway' south of Kidlington. The adopted Cherwell Local Plan locates the majority of new development at Bicester and Banbury where good road, rail and public transport infrastructure can provide access to employment, services and facilities. Significant further improvements to the transport infrastructure at Banbury, Bicester and Kidlington, and for Oxford City, are contained in Oxfordshire County Council's fourth Local Transport Plan (LTP4).

Infrastructure

There will be investment in infrastructure across the Cherwell District to 2031 and this is detailed in the Infrastructure Delivery Plan accompanying the Local Plan. Similarly, planning policies in Oxford seek to ensure that new development is supported by all necessary physical, social, economic and green infrastructure. The availability of infrastructure such as schools, healthcare, and utilities will all influence the location of additional growth. It is also important that the additional growth does not worsen any existing infrastructure challenges.

What do you think are the main infrastructure issues we should consider?

How do these issues affect the location of new development?

What do you think are the main transport issues we should consider? How do these issues affect the location of new development?

Economy

The adopted Cherwell Local Plan supports economic growth and competitiveness, and seeks to reduce the level of out-commuting and to provide a more locally self-sufficient and sustainable economy. Oxford, as the only City in Oxfordshire and with its universities and history, is the economic centre of the county. There are a number of shared economic influences for Cherwell and Oxford City including commuting patterns; the proximity of Kidlington, London-Oxford Airport and Begbroke Science Park to Oxford; Bicester's growing influence; and the international tourism draw of both Oxford City and Bicester Village.

What do you think are the main economic issues we should consider? How do these issues affect the location of new development?

Sustainability

The Cherwell Local Plan Part 1 seeks to deliver sustainable development, to ensure that the need to travel is reduced and sustainable travel is promoted, and to ensure that resources such as energy, water and waste are managed more efficiently. The development of the North West Bicester Eco-Town, a 'zero



carbon' development, is central to this strategy. Identifying additional locations for growth to meet Oxford's unmet housing needs will need to support the sustainable Cherwell strategy.

How do these issues affect the location of new development?

Similarly in Oxford City, sustainable development is promoted including low and zero carbon development that demonstrates the efficient use of natural resources. In Oxford City air pollution and traffic noise are particular issues.

What do you think are the main sustainability issues we need to consider

The Natural Environment

Cherwell is a rural district with attractive and high quality built and natural environments. Cherwell has dispersed rural settlements and the countryside surrounding the towns and villages plays an important part in the open and agricultural setting and identity of these places. The adopted Local Plan seeks to strictly control development in the



open countryside and directs most of the growth to the urban areas. The constraints and opportunities presented by the District's natural environment will need to be a key consideration in determining where to locate new growth. For example, both Cherwell and Oxford have areas at risk of flooding.

What do you think are the main natural environment issues we need to consider?

How do these issues affect the location of new development?



Built and Historic Environment

Cherwell District has a high quality and distinctive built and historic environment. It includes many designated heritage assets and Conservation Areas. Banbury, Bicester and Kidlington each display their own unique character, and in the rural areas the wider countryside setting of Cherwell's villages plays an important role in their identity. Oxford is a world-renowned historic city with important designated and undesignated heritage assets. The Oxford Green Belt plays a particular role in preserving the setting and

special character of historic Oxford. Protecting and improving the built and historic environments will be essential in identifying locations for additional development.

What do you think are the main built and historic environment issues we need to consider?

How do these issues affect the location of new development?

Call for Sites

The consultation paper does not propose any development sites. We are inviting the submission of sites with potential to deliver housing development in the Cherwell District in the interest of meeting some of Oxford's unmet housing needs. Promoted sites must be for over 10 dwellings. We are also consulting on the size of the strategic sites that should ultimately be included in the Partial Review document.

Do you wish to promote a site for development? Please provide details using the form at www.cherwell.gov.uk/policypublicconsultation

Have Your Say

Where can you find out more about the Partial Review of the Local Plan?

The Partial Review – Issues Consultation and related documents, including representation form, are available to view online at www.cherwell.gov.uk/policypublicconsultation

The consultation paper is accompanied by a Sustainability Appraisal Scoping Report, on which comments are also invited. Sustainability Appraisal will assess the social, economic and environmental effects of the Partial Review's proposals. A Scoping Report has been produced which sets out the proposed scope and level and detail of the appraisal process.

Copies of the consultation documents are available to view at public libraries across the Cherwell District, at the council's Linkpoints at Banbury, Bicester and Kidlington, at Banbury and Bicester Town Councils and Cherwell District Council's main office at Bodicote House, Bodicote, Banbury. In Oxford, hard copies are available at the Oxford City Council offices at St Aldate's Chambers, at Oxford Central Library (Westgate Centre), at Old Marston Library and at Summertown Library.

How can you get involved?

Consultation is taking place from Friday 29 January to Friday 11 March 2016.

The responses received to this consultation will inform preparation of the next stage, consultation on the spatial options, currently

timetabled for late Summer 2016.

Please complete a representation form at www.cherwell.gov.uk/policypublicconsultation

Alternatively pick up a representation form from one of the locations listed.



Email or postal representations should be headed 'Partial Review of the Cherwell Local Plan' and sent to:

Planning Policy Team,
Strategic Planning and the Economy,
Cherwell District Council,
Bodicote House,
Bodicote,
Banbury,
OX15 4AA

Planning.policy@cherwell-dc.gov.uk

Representations should be received no later than
Friday 11 March 2016.

Glossary of Terms

Duty to Cooperate – a legal duty introduced by the Localism Act 2011. In preparing Local Plans, Local Authorities must engage constructively, actively and on an on-going basis.

National Planning Policy Framework – national guidance produced by the Government to be followed in preparing Local Plans and determining planning applications.

Oxfordshire Growth Board – a joint committee including local authorities in Oxfordshire and other non-voting members including the Environment Agency, Network Rail & Highways England. Through the Oxfordshire Growth Board the Oxfordshire authorities are working together under the legal ‘Duty to Cooperate’.

Oxfordshire Housing Market Area – the subregional housing market that Cherwell falls within. It includes the whole of the county of Oxfordshire.

Oxfordshire Strategic Housing Market Assessment – a study produced in 2014 by consultants on behalf of the Oxfordshire local authorities which contains an ‘objective’ assessment of housing needs across Oxfordshire. It is objective in that it does not apply constraints to the level of need.

For further information about this consultation, please contact the council's Planning Policy Team:

Planning Policy Team
Strategic Planning and the Economy
Cherwell District Council
Bodicote House
Bodicote
Banbury
OX15 4AA

Email: planning.policy@cherwell-dc.gov.uk
Call: 01295 227985

Appendix 3 – Consultation poster

Cherwell Local Plan 2011 – 2031 (Part 1) Partial Review - Oxford's Unmet Housing Need

Issues and Scoping Consultations



Your chance to comment

How might
Cherwell District Council
help meet Oxford's unmet
housing needs?

What are the
issues and sites that
need to be
considered?

The Cherwell Local Plan Part 1 provides for Cherwell District's development needs to 2031. The Oxfordshire Councils are working together to determine how Oxford's unmet housing need might be addressed.

Cherwell District Council is consulting on the issues it needs to consider in making its contribution.

View the consultation documents and give the council your comments.

Draft Statement of Community Involvement Consultation

View the Council's Draft Statement of Community Involvement and provide your comments.

How should Cherwell
District Council involve local
communities in preparing
its future planning policy
documents?

Making your comments

View the consultation documents on-line at www.cherwell.gov.uk/policypublicconsultation

Fill in a consultation form and send your comments to: planning.policy@cherwell-dc.gov.uk

Or by post to: Planning Policy Team, Strategic Planning and the Economy, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA



For more information call: 01295 227985

Cherwell

DISTRICT COUNCIL
NORTH OXFORDSHIRE

Appendix 4 – Representation Form

THE CHERWELL LOCAL PLAN 2011 – 2031 (PART 1)
PARTIAL REVIEW – OXFORD’S UNMET HOUSING NEED
ISSUES AND SCOPING CONSULTATION JANUARY 2016
DRAFT STATEMENT OF COMMUNITY INVOLVEMENT JANUARY 2016

Representation Form

Cherwell District Council is currently consulting on a Partial Review of the Cherwell Local Plan Part 1. The Partial Review is not a wholesale review of the Local Plan Part 1, which was adopted by the Council on 20 July 2015. It focuses specifically on how to accommodate additional housing and supporting infrastructure within Cherwell in order to help meet Oxford’s unmet housing needs.

It will be available to view and comment on from 29 January – 11 March 2016.

To view and comment on the document, and to view the accompanying Sustainability Appraisal Scoping Report and a summary leaflet visit www.cherwell.gov.uk/policypublicconsultation. The documents are also available to view at public libraries across the Cherwell District, at the Council’s Linkpoints at Banbury, Bicester and Kidlington, at Banbury and Bicester Town Councils and Cherwell District Council’s main office at Bodicote House, Bodicote, Banbury. In Oxford, hard copies are available at the Oxford City Council offices at St Aldate’s Chambers, at Oxford Central Library (Westgate Centre), at Old Marston Library and at Summertown library.

We are also consulting on a Draft Statement of Community Involvement at the same time.

Please use this representation form to make your comments. **This representation form is available to complete and submit online** at www.cherwell.gov.uk/policypublicconsultation

Please note that all comments received will be made publicly available.

Please complete one box/sheet per question.

Comments are invited on:

- 1. The Cherwell Local Plan 2011 – 2031 (Part 1) Partial Review – Oxford’s Unmet Housing Need**
- 2. The Cherwell Local Plan Part 1 Partial Review – Sustainability Appraisal Scoping Report**
- 3. The Draft Statement of Community Involvement**

All documents are available to view at www.cherwell.gov.uk/policypublicconsultation

Visit www.cherwell.gov.uk/policypublicconsultation

Post completed forms to Planning Policy Team, Strategic Planning and the Economy, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA or email to planning.policy@cherwell-dc.gov.uk

THE CHERWELL LOCAL PLAN 2011 – 2031 (PART 1) PARTIAL REVIEW – OXFORD’S UNMET HOUSING NEED ISSUES AND SCOPING CONSULTATION JANUARY 2016 – Representation Form

Please provide the following details:

NAME:

ADDRESS:

.....

.....

EMAIL:

AGENT

NAME:

AGENT

ADDRESS:

.....

.....

AGENT

EMAIL:

Your details will be added to our mailing list and you will be kept informed of future progress of this document and other Local Plan documents. If you wish to be removed from this mailing list please contact the Planning Policy team. Details are at the bottom of this representation form.

1. The Cherwell Local Plan 2011 – 2031 (Part 1) Partial Review – Oxford’s Unmet Housing Need

LOCAL PLAN PART 1 PARTIAL REVIEW – ISSUES CONSULTATION PAPER

To which question does your comment relate? (Please refer to the question number)	
--	--

Please use this space to enter your comments. Please use one response box per question:

Please continue on another sheet if necessary.

Visit www.cherwell.gov.uk/policypublicconsultation

Post completed forms to Planning Policy Team, Strategic Planning and the Economy, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA or email to planning.policy@cherwell-dc.gov.uk

2. The Cherwell Local Plan Part 1 Partial Review – Sustainability Appraisal Scoping Report

Sustainability Appraisal Scoping Report

Do you have any comments on the Sustainability Appraisal Scoping Report accompanying the Local Plan Part 1 Partial Review consultation?

Please make it clear to which part of the Sustainability Appraisal your comments relate.

3. The Draft Statement of Community Involvement

Draft Statement of Community Involvement (2016) / Approach to this Consultation

Do you have any comments on the draft Statement of Community Involvement (2016) or the approach to this consultation on the Local Plan Part 1 Partial Review in particular?

(If commenting on the draft Statement of Community Involvement please indicate the section to which your comments relate)

Thank you for taking the time to respond to this consultation. Please ensure your comments are submitted by Friday 11 March 2016.

Visit www.cherwell.gov.uk/policypublicconsultation

Post completed forms to Planning Policy Team, Strategic Planning and the Economy, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA or email to planning.policy@cherwell-dc.gov.uk

Appendix 5 – Call for Sites Site Submission Form

Call for Sites January 2016

Cherwell Local Plan Part 1 Partial Review and Cherwell Local Plan Part 2

Site Submission Form

Please return this Site Submission Form with a site plan by 11 March 2016.

Submissions should be sent to:

**Planning Policy Team, Strategic Planning and the Economy, Cherwell District Council,
Bodicote House, Bodicote, Banbury, OX15 4AA.
Or by e-mail to planning.policy@cherwell-dc.gov.uk**

If you have any queries in completing this form please contact the Planning Policy Team on 01295 227985.

The Local Plan Part 1 Partial Review will make strategic site allocations in the interest of meeting Cherwell's contribution to Oxford's unmet housing needs. The Local Plan Part 1 applies a minimum threshold of 100 dwellings for strategic residential or mixed use sites. However, the Council will need to determine the appropriate threshold for the allocation of sites in the Partial Review of the Local Plan Part 1.

The Local Plan Part 2 will provide for non-strategic site allocations in accordance with Local Plan Part 1. Non-strategic housing sites are considered to be sites for up to 100 dwellings. There is no threshold for sites for the travelling communities. Non-strategic employment sites are considered to be sites of about 3 hectares or less. We will also consider sites to meet other identified needs such as for leisure, open space and community needs.

Sites promoted for residential development must be capable of accommodating at least 10 dwellings.

Site submissions will be made publicly available and will be considered in preparing the Council's plan-making evidence base.

Please indicate whether you wish to promote a site for consideration in the Cherwell Local Plan Part 1 Partial Review, the Cherwell Local Plan Part 2 document, or both. Please complete a separate form for each site you are promoting.

Reason for Site Submission
Cherwell Local Plan Part 1 Partial Review
Cherwell Local Plan Part 2

<i>Please tick ✓</i>

Site Plan

This form should be accompanied by a site plan at a recognised OS base. **The Council regrets that representations received with no associated plan cannot be considered further.** The site plan should clearly illustrate the following information:

- The exact boundary details (**coloured red**) of the site that is to be included
- The area of the site considered to be developable (**coloured brown**)
- Potential access points (*vehicular and non-vehicular*)

1. Contact Details

	Agent	Site Owner
Name:		
Address:		
Tel:		
Email:		

Is there a developer option on the site which can be disclosed? (*please provide details*)

Does the site include any land for which the owner is not presently known? If so, please indicate on the site plan.	Yes/No

2. Site Details

Site Name / Description	
Address / Location	
Total Area (hectares)	
Brownfield (hectares)	
Greenfield (hectares)	
Developable site area (hectares) <i>(the area of the site capable of being developed. Please indicate on a plan).</i>	
OS Grid Ref.	
Current use of the site	

Current planning status <i>(e.g. planning permission, current planning application, allocated in Local Plan, no planning permission)</i>	
Relevant planning history	
What are the surrounding land uses?	

3. Development Opportunities

Please summarise the proposed development and the opportunities presented by the site:

4. Proposed Use of Land

Residential

Total number of dwellings
Affordable units
Self-Build homes

Employment

Type of Employment Proposed (hectares)
Business (offices) – Use Class B1
General Industrial – Use Class B2
Storage or Distribution – Use Class B8)

Indicative floorspace by use class (sq. m)
Business (offices) – Use Class B1
General Industrial – Use Class B2
Storage or Distribution – Use Class B8

Retail / Leisure

Use Proposed
Indicative floorspace by use class (sq.m)

Open Space, Sport & Recreation

Hectares by type

5. Constraints Affecting the Site **Please tick** **Comments**

	✓	
Flood Zone 2 or 3		
Green Belt		
Area of Outstanding Natural Beauty		
Site of Special Scientific Interest		
Ecological Interest		
Agricultural Land		
Site is of amenity value		
Tree Preservation Orders		
Contamination likely to be present		
Conservation Area		
Historic Park and Garden		
Listed Building on or adjacent to the site		
Registered Battlefield		
Other Historic Interest		
Other		

6. Accessibility

	Comments
Public transport accessibility (e.g.	

range of means of transport and frequency of service)	
Access to services and facilities (e.g. employment, retail, leisure, health, school, post office)	
Access to the site (vehicle and pedestrian access)	

7. Delivery/Availability

Please describe how the site will be made available and could be delivered

Expectation for delivery	Please tick ✓	Comments
2015 – 2020		
2020 – 2025		
2025 – 2031		

8. Site Designation as Local Green Space

Are you putting land forward for designation as Local Green Space?

Yes/No

If you are putting land forward for designation as Local Green Space, please explain how this land meets the requirements for Local Green Space designation (as per the National Planning Policy Framework and the National Planning Practice Guidance)¹

¹ See paragraph 77 of the NPPF at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) and guidance in the NPPG at <http://planningguidance.communities.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

9. Other Supporting Information

Please include any further supporting information for the site.

Thank you for completing this form. Please ensure that it is submitted with your plan to the Council no later than 11 March 2016.

Appendix 6 – List of Attendees: Town and Parish Council/Meeting Workshops

Cherwell Local Plan 2011-2031 (Part 2 and Cherwell 2011-2031 Local Plan (Part 1) Partial Review – Oxford’s Unmet Housing Need

Parish Council Workshops 23rd – 24th February 2016

List of Attendees

- Ambrosden Parish Council
- Ardley with Fewcott Parish Council
- Banbury Town Council
- Bicester Town Council
- Bletchingdon Parish Council
- Bloxham Parish Council
- Bodicote Parish Council
- Bourton Parish Council
- Bucknell Parish Council
- Caversfield Parish Council
- Chesterton Parish Council
- Claydon with Clattercote Parish Council
- Cropredy Parish Council
- Duns Tew Parish Council
- Fringford Parish Council
- Fritwell Parish Council
- Hook Norton Parish Council
- Horley Parish Council
- Kidlington Parish Council
- Kirtlington Parish Council
- Launton Parish Council
- Lower Heyford Parish Council
- Middleton Stoney Parish Council
- Milcombe Parish Council
- Mollington Parish Council
- Noke Parish Council
- North Newington Parish Council
- Sibford Ferris Parish Council
- Souldern Parish Council
- South Newington Parish Council
- Stoke Lyne Parish Council
- Stratton Audley Parish Council
- Upper Heyford Parish Council
- Wardington Parish Council
- Wendlebury Parish Council
- Weston-on-the-Green Parish Council
- CDC Councillor K. Atack
- CDC Councillor D. Webb

Appendix 7 – Representations Promoting Sites

Representations to the Partial Review Issues Consultation January 2016

Representations Proposing Sites

	Rep ID	Promoted Site Address	Promoted Site Location (*)	Main Proposed Use
1	PR-A-072	Land at South Adderbury	Adderbury	Residential
2	PR-A-072	Land at Berry Hill Road	Adderbury	Residential
3	PR-A-123	The Paddock, Berry Hill Road	Adderbury	Residential
4	PR-A-130	Land West of Banbury Road	Adderbury	Residential
5	PR-A-047	Land East of Banbury Business Park	Adderbury	Residential & Employment
6	PR-A-107	Land Adjoining Playing Field, Fewcott	Ardley	Residential
7	PR-A-107	Land Adjoining Southern Edge of Village	Ardley	Residential
8	PR-A-027	Junction 10 M40	Ardley & Stoke Lyne	Employment
9	PR-A-086	Land off Warwick Road	Banbury	Residential
10	PR-A-064	Land at Wykham Park Farm, North of Wykham Lane	Banbury	Residential
11	PR-A-006	Land West of Southam Road	Banbury	Residential
12	PR-A-070	Land at Southam Road	Banbury	Residential
13	PR-A-102	Bretch Farm, Broughton Road	Banbury	Residential
14	PR-A-120	Banbury Academy, Ruskin Road	Banbury	Residential
15	PR-A-122	Land Adjoining Dover Avenue and Thornbury Drive	Banbury	Residential
16	PR-A-124	Land to the North of Broughton Road	Banbury	Residential
17	PR-A-128	Land to the South of Crouch Farm	Banbury	Residential
18	PR-A-135	Lower Cherwell Street Industrial Estate	Banbury	Residential
19	PR-A-145	Land off Dukes Meadow Drive	Banbury	Residential
20	PR-A-009	Land at Junction of Langford Lane/A44	Begbroke	Residential & Employment
21	PR-A-009	Begbroke Lane, North East Field	Begbroke	Residential

22	PR-A-051	Land South of Solid State Logic HQ, Spring Hill Road	Begbroke	Residential
23	PR-A-111	Land at No. 40 and Rear Of 30-40 Woodstock Road East	Begbroke	Residential
24	PR-A-140	South of Sandy Lane	Begbroke	Residential
25	PR-A-074	Begbroke Science Park	Begbroke & Yarnton	Residential
26	PR-A-097	North West Bicester Eco-Town	Bicester	Residential (mixed use)
27	PR-A-089	Land at Skimmingdish Lane	Bicester	Residential
28	PR-A-133	Land at Little Chesterton	Bicester (Chesterton)	Residential
29	PR-A-134	Land to West of Himley Village, Middleton Stoney Road	Bicester	Residential
30	PR-A-135	McKay Trading Estate, Station Approach	Bicester	Residential
31	PR-A-138	The Plain, Land East of B4100	Bicester	Residential
32	PR-A-144	Land at North West Bicester	Bicester	Residential
33	PR-A-052	Land North and South of Milton Road	Bloxham	Residential
34	PR-A-090	Land East of South Newington Road	Bloxham	Residential
35	PR-A-115	Newlands Caravan Site, Milton Road	Bloxham	Residential
36	PR-A-105	Land South of Wards Crescent	Bodicote	Residential
37	PR-A-113	Newlands/Caulcott Farm/Greenway, South Street	Caulcott	Residential
38	PR-A-126	Dymock Farm, Buckingham Road	Caversfield	Flexible
39	PR-A-136	South Lodge, Fringford Road	Caversfield	Residential
40	PR-A-139	Land North of Rau Court	Caversfield	Residential
41	PR-A-139	Land South of Springfield Road	Caversfield	Residential
42	PR-A-127	Land at Lodge Farm	Chesterton	Residential & Employment
43	PR-A-114	Oxford Road	Deddington	Residential
44	PR-A-119	Durrants Gravel	Finmere	Residential
45	PR-A-057	Land North of Oxford	Gosford and Water Eaton	Residential

46	PR-A-131	Land to the East of Kidlington and West of the A34	Gosford and Water Eaton	Residential
47	PR-A-141	Land Adjacent Oxfordshire Inn	Heathfield	Residential
48	PR-A-110	Hornton Hill Farm, Quarry Road	Hornton	Residential
49	PR-A-118	Land at Bell Street	Hornton	Residential
50	PR-A-096	Land off Bletchindon Road and Kidlington Road	Islip	Residential
51	PR-A-096	Land off Mill Lane/Kidlington Road North of the Railway Line	Islip	Residential
52	PR-A-109	Oil Storage Depot, Bletchingdon Road	Islip	Residential
53	PR-A-004	Land North of The Moors and East of Banbury Road	Kidlington	Residential
54	PR-A-019	Land North of The Moors	Kidlington	Residential
55	PR-A-041	Land off Langford Lane	Kidlington	Employment
56	PR-A-053	London Oxford Airport	Kidlington	Mixed use (aviation, employment, transport, housing)
57	PR-A-067	North Oxford Triangle	Kidlington (Gosford & Water Eaton)	Mixed use
58	PR-A-080	Land at Webbs Way	Kidlington	Residential
59	PR-A-080	Land Adjoining 26 & 33 Webbs Way	Kidlington	Residential
60	PR-A-080	Langford Locks (Station Field Industrial Park)	Kidlington	Employment
61	PR-A-103	Land East of Hampden Farm	Kidlington	Residential
62	PR-A-137	Land at Stratfield Farm, Oxford Road	Kidlington	Residential
63	PR-A-071	Land at Grange Farm	Launton	Residential
64	PR-A-143	Land South East of Lower Heyford	Lower Heyford	Mixed use
65	PR-A-108	Oak View	Milcombe	Residential
66	PR-A-142	Land and Buildings at 12 Heath Close	Milcombe	Residential
67	PR-A-009	Land North West of Oxford Airport	Nr Woodstock (Shipton on Cherwell)	Residential, employment, retail
68	PR-A-117	Site to East of M40	Overthorpe (Banbury)	Employment

69	PR-A-014	Land at Drinkwater	Oxford (Gosford & Water Eaton)	Residential & Leisure
70	PR-A-062	Frieze Farm, Woodstock Road	Oxford (Gosford & Water Eaton)	Mixed use
71	PR-A-104	Land at Bunkers Hill	Shipton on Cherwell	Residential
72	PR-A-104	Land at Shipton on Cherwell	Shipton on Cherwell	Infrastructure
73	PR-A-106	Shipton on Cherwell Quarry	Shipton on Cherwell	Residential (mixed use)
74	PR-A-124	Land at Lower End	Shutford	Residential
75	PR-A-124	Land to the North of Banbury Road	Shutford	Residential
76	PR-A-125	Land West of Hook Norton Road	Sibford Ferris	Residential
77	PR-A-022	Land South of Upper Heyford Airfield	Upper Heyford	Residential
78	PR-A-148	Letchmere Farm, Camp Road	Upper Heyford	Residential
79	PR-A-132	Land West of Chilgrove Drive and North of Camp Road	Upper Heyford	Residential
80	PR-A-141	Heyford Leys Camping Park, Camp Road	Upper Heyford	Residential
81	PR-A-083	Land East of Wendlebury	Wendlebury	Residential & Leisure
82	PR-A-112	Church Field, Wendlebury Road	Wendlebury	Residential
83	PR-A-088	Land North and South of A34/West of M40 Junction 9	Weston on the Green	Residential (mixed use)
84	PR-A-116	Field known as Baby Ben, adjoining Northampton Road	Weston on the Green	Residential
85	PR-A-116	Land adjoining Caerleon, Northampton Road	Weston on the Green	Residential
86	PR-A-116	Land opposite Staplehurst Farm, Church Road	Weston on the Green	Residential
87	PR-A-061	Land to South of A34, north of Linkside Avenue	Wolvercote (Gosford & Water Eaton)	Residential & Employment
88	PR-A-061	Land to South of A34, adjacent to Woodstock Road	Wolvercote (Gosford & Water Eaton)	Residential & Employment
89	PR-A-061	Land to West of A44, north of A40	Wolvercote (Gosford & Water Eaton)	Residential & Employment
90	PR-A-009	Land East of Marlborough School	Woodstock (Shipton on Cherwell)	Residential

91	PR-A-121	Land to the North of Stratford Road (1)	Wroxton	Residential
92	PR-A-121	Land to the North of Stratford Road (2)	Wroxton	Residential
93	PR-A-121	Land to the North of Stratford Road (3)	Wroxton	Residential
94	PR-A-121	Land to the North of Stratford Road and West of The Firs	Wroxton	Residential
95	PR-A-061	Land West of A44/Rutten Lane, North of Cassington Road, surrounding Begbroke Wood	Yarnton	Residential
96	PR-A-129	Knightsbridge Farm	Yarnton	Residential

(*) Location is as per stated in the representation unless this refers to the site as being outside of Cherwell District in which case a check has been made against GIS and the correct CDC parish boundary stated in brackets. Amendments have been proposed to the stated location of two sites (in brackets) (North Oxford Triangle and Little Chesterton) but no other sites have been checked as to the actual parish in which the site is located.

Appendix 8 – Representations to the Issues Consultation

Rep No.	Representative Respondent	Question No.	Question number assigned to in summary	Comments	Sustainability Appraisal Scoping Report - Comments
PR-A-001	R E Everitt		13	<p>This particularly deals with planning some of the housing that should not be placed in Oxford City is to be placed in Cherwell District. The majority will end in Banbury, Bicester and Kidlington. All three cases it is essential that the accomodation as such does not cause abutting onto nearby villages so losing their village identity. This is already in danger with Banbury and Bodicote.</p> <p>Employment possibilities must be considered to account for this extra population. This overflow would indicate very serious consideration as to how after 2031 with Oxford City unable to take any more housing, the four districts will cope with any planned expansions.</p>	
PR-A-002	Godington Parish Meeting		General & SCI	<p>Parish meetings were set up under the 1972 Local Government Act as an organisation to take part in local government. Where a meeting is in place everybody on the electoral roll is a member. PMs are in fact the most democratic form of local government and should certainly be consulted on relevant matters in a plan. Why are parish meetings not mentioned in the proposed local plan? PMs are often confused with Parish Councils which in fact have quite different legislation.</p>	
PR-A-003	T Snow		3	<p>Oxford's housing needs are well described. It is hard to exaggerate the effect of high house prices and rents in Oxford. Employers in the public and private sectors find it impossible to recruit and retain the staff they need. I see this in schools in Blackbird Leys. Good staff are desperately wanted but those few who join find they cannot afford to stay.</p>	
PR-A-003	T Snow		6	<p>Yes, the area should be close to Oxford to try to accommodate the large number of people who work in Oxford but cannot afford to live there. District wide would be an irrelevance.</p>	
PR-A-003	T Snow		7	<p>Houses should be within the affordable range of those on average incomes. They should be near to public transport links. 'Development gains' must be recaptured to provide infrastructure.</p>	
PR-A-003	T Snow		9	<p>Yes, Green Belt building should indeed be considered. The Green Belt is a thick tight corset around Oxford and has been one of the principal inhibitors of the natural growth of a dynamic city. Sites have been identified of no great landscape value to allow major construction. It has always been accepted that incursion to the Green Belt would have to be made to deal with housing shortage and traffic congestion and we have both of these in spades.</p>	
PR-A-003	T Snow		14	<p>Affordability and near transport links as I have said already. Also consider flats - perfectly ok for singles, families with no children and old people who are going to be increasing by numbers.</p>	
PR-A-004	Strutt & Parker LLP / Dairystock Limited		1	<p>It is considered that the working figure of 3,500 homes is a reasonable assumption at this stage in the process. However, it is recommended that this figure is set as a minimum target for Cherwell District to meet because neighbouring authorities, most notably West Oxfordshire, may not be able to accommodate a similar number of houses due to the environmental constraints within those authorities, such as the proportion of the district that is designated an Area of Outstanding Natural Beauty (AONB). Because Cherwell has less areas of 'protected landscape' it is considered that it could meet somewhere between 4,000 and 5,000 new homes.</p>	
PR-A-004	Strutt & Parker LLP / Dairystock Limited		2	<p>While it is not considered essential for the additional housing to be supported by additional employment generating development, it is apparent that opportunities exist for the housing growth to be complimented by further employment development within the district. Our client's site to the north of Kidlington (as shown on the attached location plan) is in close proximity to essential services and facilities and is well linked to the future expansion of Begbroke Science Park set out in Policy Kidlington 1 (Accommodating High Value Employment Needs) of the Council's adopted Local Plan. The construction of new homes near to jobs and employment would minimise journey lengths and provide a good balance of land uses, as encouraged by paragraph 37 of the National Planning Policy Framework (NPPF). The site would therefore contribute to the creation of a sustainable, mixed community. The prospect of further expansion at the Science Park will be improved by providing new housing on our client's land as it will create a larger workforce in the local area.</p>	

PR-A-004 Strutt & Parker LLP / Dairystock Limited	4	<p>The additional growth in the district should aim to fulfil the three aspects of sustainable development as defined by the National Planning Policy Framework (NPPF): economic, environmental and social. By locating development in the most sustainable location – near to existing services, facilities and employment opportunities – will ensure that these three aims are met. Development on our client’s land would result in the release of some Green Belt land to the north of Kidlington and, in turn, would result in some landscape change. However, the logical and sustainable location of this land and the economic and social benefits that would be gained from developing the site would outweigh any environmental harm. In any case, suitable landscaping could be planted along the northern boundary of the site to reinforce the edge of the development and a substantial area of the site could remain undeveloped so that it could be used as recreational/amenity space with the potential of creating a country park for the benefit of the wider Kidlington community.</p>
PR-A-004 Strutt & Parker LLP / Dairystock Limited	8	<p>It is considered that the whole district may need to contribute towards meeting Oxford’s unmet housing need, but that due to the scale of the additional housing need (at least 3,000 new homes) it is submitted that strategic allocations will need to be made in order to meet this need. The housing market within Banbury and Bicester will be saturated if a significant number of additional large scale allocations are proposed for these towns. As such, it is considered that allocations should be made in and adjoining the larger villages and, in particular, Kidlington which has the closest relationship with the city. Our client’s land is suitable for a strategic development and is available now.</p>
PR-A-004 Strutt & Parker LLP / Dairystock Limited	9	<p>The Oxford Green Belt continues to restrict the ability of new development for the city to be located in the most sustainable and logical location, i.e. closest to the city. It is clearly important to maintain the Green Belt to ensure that urban sprawl is controlled and that coalescence between settlements does not occur. However, a detailed review of the Oxford Green Belt must be undertaken to consider whether the designation is still fit for purpose given the county’s current housing needs. In particular, the potential for new housing to be located within the Green Belt – potentially on the edges of Kidlington – must be properly assessed. The ‘Area for Search’ should therefore include the Green Belt.</p>
PR-A-004 Strutt & Parker LLP / Dairystock Limited	15	<p>Site submission - Land North of Kidlington. Sites that can form part of strategic scale sustainable urban extensions should be considered. Oxford’s unmet housing need will only be fully met if sites of a strategic scale are allocated and the most logical way of achieving this is by extending the existing larger settlements that are well related to the city.</p> <p>The site extends to 37 hectares approx with a potential developable site area of around 20 hectares. Such a site area has a capacity for of up to 500 dwellings assuming a density of 25 dwellings per hectare. Potentially a country park on the site.</p> <p>It would be possible to develop the site in conjunction with the land immediately to the south, which has previously been submitted to Cherwell District Council for consideration under site reference KI104 (Land North of The Moors). According to the Council’s most recent SHLAA Update 2014, this adjoining land has been identified as a site outside of an existing settlement with future potential for development.</p> <p>It is submitted that a combination of our client’s land and SHLAA site KI104 provides a logical opportunity for a strategic scale urban extension to the north of Kidlington, which would help meet the significant unmet housing need of Oxford City. Another advantage of development to the north of Kidlington is that it would avoid the coalescence issue that potential extensions south of Kidlington and north of Oxford would create (if approved).</p> <p>Site information provided.</p>
PR-A-004 Strutt & Parker LLP / Dairystock Limited	28	<p>Site Submission - Land North of The Moors and East of Banbury Road, Kidlington. We wish to submit a site on behalf of our client. This site has been submitted as part of the current ‘Call for Sites’ consultation and is described as ‘Land north of Kidlington’ (OS Grid Ref. E: 448807 N: 215187).</p>

<p>PR-A-004 Strutt & Parker LLP 16 and 17 / Dairystock Limited</p>	<p>The existing strategic highway network, particularly the A40, A34 and A44, are functioning at close to capacity, which adversely affects travel times and in turn the economic productivity and success of the county. While infrastructure improvements may help to alleviate these issues, it is clear that the projected housing growth both in Cherwell District and across the county will place an increased pressure on this network.</p>
<p>It is considered that some of these problems could be solved by locating new housing development close to the strategic transport links that already exist. Our client's site is in close proximity to Oxford, as well as the recently opened Oxford Parkway railway station. Housing development in this location would therefore have excellent connectivity with public transport into and out of the city, while also allowing residents to travel north to Bicester or south to London from the new railway station. This approach of planning new development close to existing infrastructure and services accords with the sustainable development objectives of the adopted Local Plan and the NPPF.</p>	
<p>PR-A-004 Strutt & Parker LLP 6 and 7 / Dairystock Limited</p>	<p>We agree that the 'area of search' should be well related to Oxford City. It would be best to deliver the city's unmet housing need in a location that is well connected to the strategic transport network and in close proximity to the city boundary so that access to the services, facilities and jobs within the city can be obtained quickly and without the need for extended journeys to be undertaken.</p>
<p>PR-A-005 D Pratt</p>	<p>16 Infrastructure-On the roads question, you plonk down 10,000 houses in Bicester by 2031 plus another 3000 yet to come creating another 20,000 cars or so. But there is no thought on the routes these incomers will take to get in and out of Bicester to get elsewhere and the surrounding villages just have to accept ever increasing traffic particularly rush hour. You mention that there is more work to be done on Exit 10 on the M40 but do not say what it is. I only hope that they are going to re route the Westbound traffic coming off to bypass coming thru Ardley, Middleton Stoney (a B road) and Kirtlington et al.</p> <p>The peripheral damage that housebuilding and employment places brings to the rural villages is not even considered by the planners and it should be. Right from the beginning when Govt dictates so much building to be done by DCs, the first reply should be a demand for outlying/bypass road funds from the Govt. (cont...)</p>
<p>PR-A-005 D Pratt</p>	<p>18 (cont...) Sewerage - I expect that TW supply this facility to most of Cherwell and they should be forefront of the Utilities that you should constantly be badgering for improvements. Kirtlington, like other villages nearby, suffer from an old fashioned pre war system of using underground fibre pipes that are blistering which have long since been unfit for purpose but CDC does not seem to be pro-active in getting TW to update their system in the areas where development is known to be forthcoming. The National Planning Policy Guidance states that development can be phased to allow time for this to be corrected but if it is not working properly now, it won't be working in the first phase of the buildout so that comment is only a sop to avoid facing the problem up front. We spoke with Mr Atherton at CDC's Environmental Health Department when this was part of his remit but he has since moved elsewhere so nothing has been done to get TW off its backside to fix the overflow problem this Village has had for years. When the villagers call TW they are fobbed off with a reply such as it is your fault for putting fat down the drains or similar. Calls are frequently not returned. (cont..)</p>
<p>PR-A-005 D Pratt</p>	<p>1&6 Oxford City Overspill - I see from your LP1 Partial Review that Kidlington is going to expand its employment positions which includes the expansion of Begbroke for Oxford's Scientific Park and yet on page 12 of the LP2 Issues Paper, at 3.5 you state that there is to be NO strategic housebuilding at Kidlington. This surprises me immensely because at numerous CDC - run talks/occasions they have stated that the main areas for building in Cherwell will be B, B and Kidlington. This means it is going to be Oxford and Kidlington's overspill that will dump even more houses in the south western part of Cherwell District and I think CDC must try and put a stop to this part of Oxfordshire being conurbated. If Oxford wants or has to expand it should look to its own Colleges to supply land of which they own a lot in and close around Oxford itself. (cont...)</p>

PR-A-005	D Pratt		<p>16 (cont...) With the new Oxford Parkway Rail station, it is obvious to those that live, work and visit Kidlington, the free parking spaces available along the main route through Kidlington are all taken up by 7.30 am by train commuters who wish to avoid parking fees at the station and then bus in or walk to the station. This is extremely difficult for those that drive into Kidlington to get to work by 9 am to find no all day free spots and are forced to use the 3 hour car parks and move their cars at three hourly intervals. Again plonking some large venture in a small town without thinking about the knock on effect - I realise this is probably OCC's doing and not yours but it goes to show the lack of forethought by district councils.</p>
PR-A-006	Rapleys / Pandora Trading Ltd	15+28	<p>Site submission - Land West of Southam Road, Banbury. Bearing in mind the above, my client is the sole owner of a 17.79 ha site known as 'Land West of Southam Road' on the northern edge of Banbury. Approximately 6 ha of our client's land benefits from an extant outline planning permission for "Development of up to 90 residential (Use Class 3/extra care housing), Class A uses, Class D1 use with associated access, landscaping/open space, parking and related works" (LPA Ref: 14/01767/OUT). This same area of land also forms part of a wider site allocation within the adopted Cherwell Local Plan 2011-2031 Part 1 (July 2015) under 'Policy Banbury 2: Hardwick Farm, Southam Road (East and West)' which seeks to deliver approximately 600 dwellings.</p> <p>As part of this current 'Call for Sites' consultation exercise, the remaining 11.5 ha of our client's land is being promoted for up to 150 homes. A Site Location Plan is enclosed.</p> <p>The site is well connected to a number of established services and facilities, including:</p> <ul style="list-style-type: none"> - A multi-functional playing field and recreational facility to the west; - A Tesco food store approximately 1 km to the south; - Banbury Town Centre circa 2 km to the south; - Employment sites including Hardwick Business Park and Banbury Cross. <p>The site will also benefit in its proximity to 500 sqm of retail and 500 sqm of community facilities, once built, being provided as part of the outline permission development immediately to the south. It will also be within easy walking distance to the new primary school being built to the east of Southam Road under planning permission 13/00158/OUT. (cont.....)</p>
PR-A-006	Rapleys / Pandora Trading Ltd	15+28	<p>(cont....) In terms of site accessibility, two multi-functional points of access will be available off Dukes Meadow Drive and Southam Road to the east to accommodate both vehicles and pedestrians. The site benefits from existing public transport provision, including two existing bus stops located on Dukes Meadow Drive approximately 200 m walking distance away, and Banbury Railway Station, circa 3km to the south of the site.</p> <p>In summary, my client is fully committed to pursuing development on the remainder of the site which falls under single ownership, is unfettered and immediately available for development. As such, my client's site represents an established sustainable location to assist Cherwell in their commitment to addressing the housing need from elsewhere in the Oxfordshire Housing Market Area, particularly Oxford City. Further details are provided on the accompanying form.</p>

PR-A-006 Rapleys / Pandora Trading Ltd	4&6	<p>The proportion of Oxford City's unmet needs that have been identified for Cherwell to accommodate is 3,500 dwellings. At this stage we have no specific observations to make with regard to this potential figure. Irrespective of the figure, the vision and principles for accommodating that need should follow and reflect the sustainable and balanced strategy already established for Cherwell in its adopted Local Plan (Part 1) – i.e., concentration of development at the main settlements of Banbury and Bicester, subject to environmental considerations. It is an anathema to suggest that the provision of an adjacent district's unmet housing need should warrant a different planning strategy from that employed within its own boundaries.</p> <p>Whilst on the one hand it might appear appropriate to concentrate the unmet need close to its source, this is not always possible, practicable or environmentally sustainable. Thus we consider that the accommodation of this need should be approached on a district-wide basis in accordance with the existing strategy. This concentration of housing at the main settlements provides opportunities to live and work in close proximity and reduce the level of out commuting to Oxford. However, an increase in housing needs to be supported by an increase in employment opportunities and other infrastructure improvements, including bus and rail corridors, if sustainable and balanced communities are to be created. (cont.....)</p>
PR-A-006 Rapleys / Pandora Trading Ltd	10	<p>(cont....) We consider that in monitoring housing provision and delivery, there should be some mechanism which distinguishes between Cherwell's own needs and that of Oxford City. The type of housing to be provided can be controlled through the planning application process rather than through a separate policy category reflecting Oxford's apparent need for more 2 and 3 bed houses. However, we do not consider it necessary or appropriate to identify specific criteria to restrict the occupation of the '3,500 or so' houses to those that have a local/familial/economic link to Oxford (in the same way that local affordable housing may be qualified). Housing need is housing need whether it is Cherwell or Oxford generated.</p>
PR-A-007 G Doucas	6	<p>No, I do not think that the 'area of search' should necessarily be 'well related' to Oxford.</p>
PR-A-007 G Doucas	8	<p>Yes</p>
PR-A-007 G Doucas	9	<p>No. This would be a very bad solution that would open the door for further future encroachments on the Green Belt. I fear that the Green Belt study is the first attempt at the gradual 'nibbling' of this valuable asset and the soothing phrases in the report are hardly convincing. There is bound to be strong opposition to any such move. In the same context, I think that it would be wrong for the District Council to allow the University to encroach on the Green Belt at Begbroke. I do not know what they propose to build there (laboratory space, offices?) but I am sure they could find space a bit further away from Oxford. After all, they do bring the Bodleian books back and forth from Swindon.</p>
PR-A-007 G Doucas	16	<p>The idea of creating additional P&R sites may have some merit, but moving existing sites away from Oxford is not a good one. If some Park and Ride sites were to be moved away from Oxford while the new housing is placed very close to the city, people who need to use their cars would have to drive away from the centre before they can get on the P&R. This is unlikely to be a successful solution.</p> <p>The loss of the Water Eaton site would be a retrograde step because it has provided an excellent service to people like me who live near (but not in) Kidlington but who do not have the bus services available to Kidlington</p> <p>The congestion on the main access roads to Oxford (A34, A44, A40) is well documented. What I have not seen is any mention on the ever increasing volume of traffic going through the centre of small villages. Our part of Yarnton, which is what is left of the old village, is a 'small' village and we have seen a huge increase in the traffic on the Yarnton-Cassington Road. I am sure that other villages must have had similar, or worse experiences. We need some protection.</p>
PR-A-007 G Doucas	26	<p>One of the most attractive features of Oxfordshire in general and of S. Cherwell in particular is the rural character of the landscape, which becomes evident at a rather short distance from the city centre. This has been commented upon by numerous visitors and is an asset worth preserving in any future planning decisions.</p>

PR-A-007	G Doucas	N/A	My comments are obviously based on my experience living in Yarnton for 16.5 years and on my understanding on what is being proposed for this area. I believe, however, that they are of more general applicability.
PR-A-008	Suzi Coyne Planning / Sheehan Haulage and Plant Hire Ltd	2	<p>Paragraph 2.19 of the Local Plan Part 1 Partial Review - Issues Consultation Paper ("the Partial Review") confirms that there is a clear link between housing need and employment growth, as well as other supporting infrastructure. Furthermore the quotations from the Oxford City Core Strategy (after paragraph 2.24 of the Partial Review) clarify that in the city there is a scarcity of available land; development is restricted by policy constraints; that it will never be possible to meet all of the city's housing and employment needs; and more particularly that housing need and demand far exceeds the amount of available and suitable land within Oxford, and employment uses struggle to compete against housing developers.</p> <p>Given this position in Oxford it is considered that the proposed additional housing in Cherwell to meet Oxford's needs must also be supported by additional employment generating development, and that land needs to be allocated for this purpose in Cherwell.</p>
PR-A-008	Suzi Coyne Planning / Sheehan Haulage and Plant Hire Ltd	20	<p>Paragraph 5.79 of the Partial Review confirms that the NPPF expects local planning authorities to support existing business sectors, and paragraph 5.81 states that the adopted Cherwell Local Plan supports economic growth and seeks to provide a more locally selfsufficient and sustainable economy.</p> <p>The waste management industry is a business sector and is one that is scarcely accommodated in Oxford at all. The Oxfordshire Minerals and Waste Local Plan Part 1 - Core Strategy Submission Document records at Table 10 that Oxford has 5 waste sites managing only 19,750 tonnes per annum of waste. This capacity amounts to a miniscule 0.8% of the County's total waste management capacity, yet with the highest population of all the Districts (at 23%) and a major economic and cultural centre Oxford is the main generator of waste within the county. The supporting text to Table 10 accepts that Oxford is unlikely to be able to provide for the waste management capacity to meet its needs. The issue therefore arises as to where and how this waste management - and economic - need should be satisfied.</p>
PR-A-008	Suzi Coyne Planning / Sheehan Haulage and Plant Hire Ltd	21	<p>The issue identified at Question 20 of the waste business sector not remotely being provided for in the city affects the potential development locations to meet Oxford's unmet needs, because the nearest existing employment sites in the Cherwell Local Plan Part 1, at Kidlington and Begbroke, are specifically for high value employment needs (paragraph 5.98 of the Partial Review). Waste management facilities are generally of the heavier industrial B2 type use and would therefore not be compatible with this locaiton. The only other employment sites that have been allocated for compatible type uses are at Bicester and Banbury, but are too far away to meet Oxford's needs and would not meet the Cherwell Local Plan objective of providing "a more locally self-sufficient and sustainable economy" (paragraph 5.81 of the Partial Review) in respect of the waste management business sector.</p> <p>The potential development locations to meet Oxford's unmet needs must therefore include employment sites which provide also for heavier industrial B2 type uses, where the waste management business sector could also locate.</p>

- PR-A-009 Blenheim Estates 1
- It is considered essential that the Area of Search should be focused on locations that are wellrelated to Oxford City. Oxford is an economicdriver, meeting the City’s unmet housing needs means that it is inevitable that many people moving into the new homes will have strong links with the City, whether for employment, leisure, family or other reasons.
- Given the above, it makes sense to ensure that housing land to meet Oxford City’s unmet need is wellrelated to the City. This means that land closest to Oxford City, but outside the Green Belt, with excellent transport links, should be considered for development first.
- In Cherwell, the main towns, Bicester and Banbury, have seen rapid growth and have significant land allocations for new housing. There is no need to allocate further land around these two towns. By way of contrast, there is a need to allocated new housing land to provide for the sustainable growth of Oxford City, within appropriate locations close to and wellconnected with, the City. Preferably, new housing allocations should also be capable of accessing daytoday services and facilities – such as local shops, schools, doctors surgery, pubs and cafes – without significant travel distances. Ideally then, the Area of Search should also focus on locations on the edge of, or very close to, existing settlements with services and facilities. In this way, meeting the needs of Oxford City can also help to boost the sustainability of existing settlements, by supporting local services and businesses and investing in infrastructure.
- PR-A-009 Blenheim Estates 2
- The key goal for additional growth in Cherwell to meet Oxford City’s unmet need should be sustainable development. This means investing in and providing for necessary infrastructure and services alongside new homes. It means providing a broad range of homes – from affordable housing through to high quality, even expensive homes, and everything in between. The best places provide for variety, and don’t simply comprise estates of the same type of housing throughout. Sustainable development means investing in high quality design – creating places that are distinctive, establish a sense of place and enhance local character.
- There should be plenty of scope for a broad range of travel options. Some parts of Cherwell closest to Oxford have some of the best transport links in the country: there is an exceptional bus link running from Woodstock to Oxford ; there are two train stations (Oxford Parkway and Long Hanborough) with fast, direct links into central London ; there is a growing international airport. Meeting Oxford’s unmet need in a sustainable manner means making the most of these exceptional transport links by associating new development with them.
- As per 1) above, to be sustainable, allocations to meet Oxford’s unmet need should have good access to services and facilities. The sites should be close to, and provide for investment in, existing centres. This is in line with national planning policy, which supports the vitality and viability of town centres.
- To achieve all of the above, it is essential that the development sites are of sufficient scale to achieve all of the above. Smaller schemes will simply be incapable of providing for the major investment needed to provide new, and invest in existing, infrastructure. By way of contrast, large developments, by their very nature, can bring major benefits in the form of direct investment in necessary infrastructure, facilities, jobs and housing for today and into the future. Ideally, each housing allocation should be for around 1,000 dwellings.
- PR-A-009 Blenheim Estates 3
- Housing allocations to meet Oxford’s unmet need should focus on existing transport corridors, preferably adjacent to major sustainable transport infrastructure – including bus corridors, Park and Ride sites and good access to railway stations; as well as excellent access to the road network, given that the majority of workers in Oxfordshire drive a car.

PR-A-009	Blenheim Estates	4	Allocations should have excellent access to existing and future employment sites. Millions of square feet of employment space exists, or has planning permission, along the North Oxford corridor, between the outskirts of the city and Woodstock. This corridor includes regionally significant science parks, an airport and rapidly growing employment areas. It is not sufficiently supported by new housing, meaning that workers need to travel from afar. New housing should be located within the same corridor. This would also have the advantage of excellent public transport access to Oxford in a transport corridor which has received £millions of investment.
PR-A-009	Blenheim Estates	5	New development should ensure significant investment in open space, sport and recreation provision, and the enhancement of biodiversity. This is easiest to achieve on large development sites, providing space to plan and sufficient returns to fund major investment in social and environmental infrastructure. Allocations should take this, local character and the preservation and where possible, enhancement of heritage assets into account.
PR-A-009	Blenheim Estates	28	Site submissions - Land at junction of Langford Lane/A44, Begbroke; Land North West of Oxford Airport, nr Woodstock; Begbroke Lane, North East Field, Begbroke; Land East of Marlborough School, Woodstock
PR-A-010	Anglian Water Services Limited	18	<p>At this stage the District Council has yet to determine whether the area of search for meeting Oxford's housing needs would be limited to the Oxford Green Belt within Cherwell District or it would be district wide. Therefore it is difficult to comment further on the implications for Anglian Water's existing infrastructure at this stage.</p> <p>However it is important that the availability of water recycling infrastructure within Anglian Water's area of responsibility is considered further by the Council when determining the distribution of housing within the district. Please note that Anglian Water would wish to comment further on any housing allocation sites identified by the District Council within our area of responsibility.</p>
PR-A-011	Sport England	18	<p>As Cherwell District Council considers increased housing provision with the implications on transport economic development, natural environment, with the partial review, it does not appear to consider the impact on open space, sports and recreation facilities as per paragraph 73 of the NPPF.</p> <p>Therefore Sport England would strongly urge CDC to prepare a robust and up to date playing pitch strategy and built facilities strategy to ensure healthy sustainable communities are created.</p> <p>Without up to date robust strategies, It is difficult to see how the partial review of the local plan could be considered to be robust.</p>
PR-A-012	Gosford and Water Eaton Parish Council	1	This amount is of concern and is questioned about there being a possibility about a hidden agenda over Oxfordshire housing with good transport connects being able to accommodate London overspill.
PR-A-012	Gosford and Water Eaton Parish Council	2	Under the principles of keeping the home to work journey distances down to a minimum, could lead to much larger developed areas. Where people may still work long way from home, which creates traffic and transport problems.
PR-A-012	Gosford and Water Eaton Parish Council	3	To keep large green spaces particularly in the Green Belt Gap between the City and Kidlington. It is considered that much of Oxford's home and business needs can be met away from the City.
PR-A-012	Gosford and Water Eaton Parish Council	28	There are no sites within the Parish which the Parish Council wishes to propose for meeting Oxford's unmet housing needs.

PR-A-012	Gosford and Water Eaton Parish Council	10-15	Would prefer integrating housing and employment that is allocated into the approved Cherwell Local Plan in stages. It is noted Gosford & Water Eaton does not appear mentioned by CDC. Under an earlier village search assessment for housing, the Parish Council accepted that in very a worst case scenario and last resort a development might become inevitable on the field sandwiched between Beagles Close and the recent Kidlington burial ground/temporary allotment site.
PR-A-012	Gosford and Water Eaton Parish Council	4-5	It should be distributed around some parts of Cherwell in stages, monitor and reduce downwards if necessary.
PR-A-012	Gosford and Water Eaton Parish Council	6-9	Should be considered on a Cherwell wide basis. CDC is reminded that the Peartree area used to be part of the Green Belt, which is now being developed as the North Oxford Gateway. Therefore Oxford City has already taken a large chunk of land out of the Green Belt, which is considered could take more housing, rather than eating further into Green Belt land. It is also considered that more housing could be accommodated within Oxford.
PR-A-012	Gosford and Water Eaton Parish Council	16-17	There is concern about the accuracy of predictions produced from the OCC national/countywide traffic modelling techniques and over input data from traffic surveys undertaken for proposed development projects. For instance from comparing peak traffic counts between results produced by consultants commissioned by Chiltern Railways, TVP HQ development & Northern Gateway development produced significant variances and after development predictions.
PR-A-012	Gosford and Water Eaton Parish Council	18-19	Concern over unsuitability of education establishments, water sewerage, medical centres, the road network and public transport to accommodate such further development. It is considered that these provisions are likely to not be met along from developer funding. It is considered that CDC's Community Infrastructure Levy (CIL) used to support infrastructure should also be used for flood prevention from developments located up stream in a watercourse catchment, for protecting existing downstream properties by funding the provision and maintenance of flood defences and watercourse maintenance.
PR-A-012	Gosford and Water Eaton Parish Council	20-21	It is considered that to accommodate the required infrastructure to support the housing and business development problems and issues generated will also require support funding from the Government and County Council which is unlikely to be available due the continually cut back of public finance.
PR-A-012	Gosford and Water Eaton Parish Council	22-23	More housing and people in Cherwell will add to more air and noise pollution, road congestion and loss of open countryside and rural areas. It is hoped CDC's Cherwell Local Plan policies can address this.
PR-A-012	Gosford and Water Eaton Parish Council	24-25	<p>The Green Belt area between Kidlington and Oxford in Parish of Gosford & Water Eaton needs protecting as it is of a high quality landscape, being important for farming & wildlife habitats, where a network of footpaths serve as a recreational facility for people living in bordering urban areas.</p> <p>The Parish Council request that in plan making and consultation involvement CIL, along with New Homes Bonus contributions should be used to provide funding for flood defences schemes. This being under the concept that surface water runoff from large developments upstream of this Parish such as Banbury, Bicester, & Upper Heyford drain one way, or another into the River Cherwell, or River Ray and that the Environment Agency has confirming that their flood alleviation scheme north of Banbury will not have any effect on flooding in this Parish. Therefore there is concern about increasing flood risk in this Parish due to the impact from upstream developments taking place. It should therefore be accepted by CDC under their involvement consultation process, that it is fair and reasonable that such developments contribute towards the cost of maintaining, upgrading and providing additional flood defences. Contributions should also be used towards EA and riparian landowner to remove fallen trees and other obstructions from out of watercourses & maintain them.</p>
PR-A-012	Gosford and Water Eaton Parish Council	26-27	There are a number of listed building in the Parish of Gosford & Water Eaton which need protecting, such as St Fridewides farm, Water Eaton Manor, Gosford House and Kings Arms (Harvester).

PR-A-012	Gosford and Water Eaton Parish Council		<p>1 The introduction is clear into why this partial review is taking place and about meeting the housing needs for Oxford by the District Councils, which is under a "Duty to Co-operate". However, there has been much criticism, especially by amenity groups over the make up representatives on the Oxfordshire Growth Board, its countywide housing predictions, green belt study and working arrangements. The Parish Council has some sympathy over these criticisms which are levelled that the process seems biased towards too much development and concerns over the future of the Oxford Green Belt and villages in Oxfordshire.</p> <p>The Parish Council has answered CDC's questions to the best of its ability about issues which have a direct, or indirect affect on the Parish and local community, as follows.</p>
PR-A-012	Gosford and Water Eaton Parish Council		<p>9 Regarding issues over meeting Oxford's unmet housing needs in Cherwell. The Parish Council is concerned enough to point out from the Oxfordshire Green Belt Study, that is deceptive and gives the general public a false impression when the Land Use Consultants identify and analyse parcels of land in the green belt which are located in this Parish by referring to them as OX(no.), as if they are associated with Oxford City. Whereas these parcels of land are in the Gosford and Water Eaton and District of Cherwell. The Parish Council request Cherwell District Council to point this out to the Oxfordshire Growth Board and press them to amend this referencing accordingly, as EWE(No)</p>
PR-A-013	R Turner		<p>1 Fundamentally the question must be asked is 3,500 homes a reasonable working assumption for Cherwell. The reasoning behind this figure is based on little real time, robust evidence. In addition the production of this data should be made independently and not by parties who are connected in anyway shape or form connected to the construction industry. The drivers of suggested growth appear to be out of line with the UK's expected growth as a whole.</p>
PR-A-014	Simply Land (Oxford) Ltd	1	<p>3,500 homes is not a reasonable working assumption. If 15,000 homes is the 'working figure' for Oxford's unmet housing need then why would Oxford City be included within the distribution. At this time, we agree it prudent for the adjoining Oxfordshire Authorities to contemplate an even distribution until such time that more detailed work has been undertaken to determine their own abilities to accommodate the unmet need. However, including Oxford City within this distribution is irrational. We consider that Cherwell along with the other Oxfordshire Authorities should plan for an additional 3,750 homes (15,000 divided by 4).</p>
PR-A-014	Simply Land (Oxford) Ltd	3	<p>A key issue for consideration is the relationship of any new housing to the City itself. Other key issues include the release of Green Belt land; and locating development along existing sustainable transport corridors or corridors which could be enhanced through development funding initiatives and grants.</p>
PR-A-014	Simply Land (Oxford) Ltd	4	<p>Development that is truly sustainable, well designed and planned. Economic, environmental and social goals will need to be identified in order to satisfy the true meaning of sustainable development.</p>
PR-A-014	Simply Land (Oxford) Ltd	6	<p>Yes</p>
PR-A-014	Simply Land (Oxford) Ltd	7	<p>Transport links/corridors, access to services and facilities and the ability of new development delivering new transport infrastructure.</p>
PR-A-014	Simply Land (Oxford) Ltd	8	<p>No. Providing for Oxford City's unmet need on a districtwide approach would displace the population and led to an increase in potentially unsustainable transport journeys back into Oxford.</p>
PR-A-014	Simply Land (Oxford) Ltd	9	<p>Yes, but only to the extent that siting development within the Green Belt does not led to 'significant' and 'demonstrable' harm which undermines the very purpose of designating land as Green Belt – prevention of urban sprawl. In my opinion, the Oxfordshire Authorities should take a closer look at the submarkets within the Oxfordshire HMA and define the 'area of search' or plan area from this.</p>
PR-A-014	Simply Land (Oxford) Ltd	10	<p>Yes, it would be prudent to do so.</p>
PR-A-014	Simply Land (Oxford) Ltd	11	<p>Adopt a ringfenced approach and limit it to the area of search' or plan area.</p>

PR-A-014	Simply Land (Oxford) Ltd	15	The Council should be looking at the Green Belt land to the east of the Oxford Road all the way up to the Water Eaton Park & Ride as well as the land north of the A34 bounded by the A40 and A44 and Oxford canal. Concentrating development in both these locations could yield circa 2,600 new homes and would be consistent with the rest of the Oxford's urban for.
PR-A-014	Simply Land (Oxford) Ltd	28	Site submission - Land at Drinkwater, Oxford
PR-A-015	P Kavanagh	1	No. It is derived from the Oxfordshire SHMA which has simply been accepted by the Council and not subjected to serious independent scrutiny. The SHMA was drawn up by private consultants who largely work for the development industry and therefore have a conflict of interest. Its figures are much too high, far in excess of previous trends and clearly unrealistic. I do not accept that the SHMA figures represent either Cherwell's or Oxford's needs.
PR-A-015	P Kavanagh	2	No. The excessive housing figures are already based on unrealistic forecasts of growth in employment. To provide for yet more employment generating development is simply creating a vicious circle.
PR-A-015	P Kavanagh	9	No. Green Belt is a permanent designation. The Green Belt around Kidlington is much valued. National Policy says that housing need is not a reason to build on the Green Belt. The Government, in its manifesto, made a commitment to protect the Green Belt.
PR-A-015	P Kavanagh	16	Transport networks in this area are already overloaded. I do not believe that current proposals will solve existing problems, let alone those caused by additional growth in Cherwell and elsewhere in the County. The Highway Authority's vision and objectives, that you quote, are vague aspirations and without substance.
PR-A-015	P Kavanagh	24	Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will further damage the natural environment of Cherwell.
PR-A-016	R Prince	1	No. The figure comes from the Oxfordshire SHMA which was prepared without any public consultation and contains many questionable assumptions. It was put together by private consultants working on behalf of property developers so I do not think it is unreasonable to take the view that figures are likely to be biased in favour of the developers. The SHMA was not subjected to any independent validation although an independent planning expert has concluded that the estimated figures in the SHMA are likely to be "grossly overstated". Consequently, I cannot accept that the SHMA reflects the housing needs of either Oxford City or Cherwell.
PR-A-016	R Prince	2	No. One of the suspect assumptions on which the overstated housing needs were arrived at in the SHMA was the level by which employment would grow. Providing more jobs would simply lead to more pressure from the developers and put a strain on local services. In the Kidlington area, we already have the example of the developers of the Technology Park in Langford Lane offering to provide 450 dwellings in the Green Belt north of The Moors to "help" to satisfy the expected demand for housing from an anticipated new workforce of 1200.
PR-A-016	R Prince	9	No. The Green Belt was put in place for a very good purpose and the increasing pressure from developers makes the reasons for doing so are even more important today than when it was first designated. The Government's own guidance states that unmet housing need is not a reason for building in the Green Belt and this has been reinforced in the manifesto of the current administration where there is a commitment to protect the Green Belt.

PR-A-016	R Prince	16	<p>Generally, I am aware of the proposals made recently to try to improve the whole transport situation in the area but they lack clarity and I am not convinced that they will solve the current problems in the long term, especially if there is to be further substantial development on top of what has already been designated for Cherwell. On a more local and specific basis, road transport is a particular issue in Kidlington. I have lived here since August 1975 and in all that time, the volume of traffic in the village and surrounding roads has increased considerably, not least because there has been widespread residential development within the village, as well as increased commercial activity, without any additional access roads being built. The congestion will now be made worse by the development of the Technology Park in Langford lane as this will bring in a new workforce of up to 1200 to the area. It is obvious, therefore, that the matter will only be exacerbated if sites in and around Kidlington are given over to providing some of the extra 3500 houses for Oxford.</p>
PR-A-016	R Prince	24	<p>The extent of development required under the local plan for Cherwell can only have a detrimental effect on the natural environment. The situation will only be made much worse if Cherwell has to find another 3500 homes for Oxford.</p>
PR-A-017	Oxford Green Belt Network	2, 8+9	<p>As the Planning Policy Team will appreciate, it is difficult for us to respond to the Consultation except in broad terms since we are in the dark over what the Oxfordshire Growth Board are likely to come up with in the summer. Since our primary concern is with the Oxford Green Belt, our comments are largely confined to those parts of the Consultation which have most bearing on the Green Belt. For us the key issue in this matter of unmet need is the future of the Green Belt.</p> <p>We are pleased to note that the Consultation recognizes the purposes of the Green Belt and it is clear to us that the main issue facing the District Council is that of balancing the role of the Green Belt against the pressure that you will be under, not least from the City Council, to locate as much of the unmet housing need as close to Oxford as possible. This being so, we urge you not to confine your area of search to the Green Belt, but to allow your search to take in the whole of Cherwell District (Question 8). Ideally, of course, we would like to see the Green Belt excluded from this area of search (Question 9), although we acknowledge that you may feel obliged to look there too.</p> <p>We have a number of observations that relate to particular parts of the Green Belt and we examine these below in the context of what the Oxfordshire Green Belt Study of 2015 has to say about them. (cont....)</p>
PR-A-017	Oxford Green Belt Network	2, 8+9	<p>(cont....) Figure 4.1 of that Study looks at the performance of the land parcels against the Green Belt purpose of checking unrestricted urban sprawl and the need to protect open land from such urban sprawl. Map Issue 1a shows parcels between Oxford and Kidlington all scoring High on this purpose (OX1, OX22, K16) and Medium in the case of OX2. This area constitutes the main portion of the 'Kidlington Gap' to which you refer in paragraph 5.28 of the Consultation, and is an area under pressure, not least from the knock-on effect from the new Oxford Parkway rail station. We hope that the High scores attributed to this area in terms of potential urban sprawl will assist you in protecting this particular part of the Green Belt, where otherwise the possibility of Oxford and Kidlington joining up, both physically and administratively, is a very real possibility in the years ahead.</p> <p>Figure 4.3 of the Green Belt Study looks at the performance of the land parcels against the Green Belt purpose of preventing settlements from merging into one another. Here the parcels that score High are those which separate the villages of Kidlington, Yarnton and Begbroke (OX1, OX22, K15-18, YA1, BB1) whilst OX2 and YA2 score Medium. The future of this area, which includes the attractive canal corridor, but also the science park at Begbroke, is critical if this purpose of the Green Belt is to be upheld. We were pleased, therefore, to note in paragraph 3.24 of your Consultation that you consider prevention of coalescence of settlements to be a key function of the Oxford Green Belt. We commend, also, your observation in paragraph 3.26 that any further housing growth at Kidlington and nearby villages to accommodate unmet housing need would have to be considered against the purposes of the Green Belt, presumably having prevention of coalescence in mind. (cont....)</p>

PR-A-017 Oxford Green Belt Network 2, 8+9

(cont...) Additionally, we fully endorse your observation in paragraph 5.136 of the Natural Environment section of the Consultation that the countryside immediately adjacent to Kidlington and Yarnton comprises part of the setting of the two villages and helps to retain their separate identity, We trust that this intention to protect village identity will carry weight in whatever you propose to do next. We hope, too, that you will bear it in mind when the small-scale review of the Green Belt at Begbroke science park takes place. Otherwise the latter is likely to act as the 'cuckoo in the nest' that will lead to the total merging of Kidlington, Yarnton and Begbroke, defeating that good intention.

Figure 4.4 of the Green Belt Study looks at the performance of the land parcels against the Green Belt purpose of assisting in safeguarding the countryside from encroachment. Understandably the areas that score High are the outer parts of the Green Belt that frame Yarnton to the west (YA2, YA3) and Kidlington to the north and east (K1-13), The latter fields, to the north of The Moors, are particularly pressured from developers keen to exploit this attractive and much enjoyed countryside towards the River Cherwell and beyond. Again, what you say in paragraph 5.136 about the need to protect the countryside adjacent to Kidlington and Yarnton applies to this area. (cont...)

PR-A-017 Oxford Green Belt Network 2, 8+9

(cont...) Figure 4.5 of the Green Belt Study looks at the performance of the land parcels against the Green Belt purpose of preserving the setting and special character of an historic town, in this case Oxford. The map indicates several areas that score Medium in this respect and we note with approval what you say in the Consultation in paragraph 5.146 that the Green Belt in the south of the (Cherwell) District plays a part in preserving the setting and special character of Oxford. It does this, in part at least, by preventing excessive levels of development that would otherwise undermine the wider aims of the Green Belt in providing open space for public enjoyment close to both the City and to nearby settlements. For this reason we reject the suggestion put forward in your **Question 2** that additional housing to meet Oxford's needs might be accompanied by additional employment. Such a policy would just create a cycle of continuing growth pressure, further employment requiring more housing and so on. This is what is happening at the City's 'Northern Gateway' where the employment planned, with only a small amount of housing, will add to the unmet housing need that Districts like your own are being expected to meet.

It is evident from the findings of the Oxfordshire Green Belt Study referred to above that practically all the Green Belt land in Cherwell District rates High on at least one, and usually more than one, of the fundamental purposes of a Green Belt. This being the case, we can only agree with your comment in paragraph 5.154 of the Consultation that meeting Oxford's needs whilst constraining development in the Green Belt is a significant challenge. Without wishing to dramatise the situation, we believe that how Cherwell District Council responds to the challenge it has set itself will determine the future of the Green Belt north of Oxford.

PR-A-018 J Wainwright

1

No, I consider the figure of a further 3500 homes additional to those already projected a grossly inflated estimate of housing needs in Cherwell. I am very surprised that this figure is being taken as gospel by Cherwell D.C. when it comes from an SHMA Report produced by people with close connections to the development sector. The classic response "They would say that, wouldn't they" springs to mind. It is an exorbitant increase wildly out of keeping with previous estimates.

PR-A-018 J Wainwright

2

No. If there is already an alleged shortage of housing in Cherwell, where is the logic in encouraging more employment generating development which is obviously going to create even greater demand for housing? This would be wilfully exacerbating the problem.

PR-A-018 J Wainwright

9

No. Green Belts were a marvellous concept created to prevent the relentless expansion of towns and cities and to provide a lung for the inhabitants of those cities. For that reason they should by definition be permanent and not vulnerable to the transient needs of local councils or the interests of developers. Moreover, National Policy states that housing need is not a valid motive for building on Green Belt and the present Conservative government in its 2015 manifesto confirmed its commitment to protecting it. The Green Belt around Kidlington is particularly scenic; it is a precious asset much used for walking and a valuable habitat for wildlife. It should be protected at all costs and any attempt to encroach upon it for development for whatever reason must be resisted. Development should be on brownfield sites, of which there are many.

PR-A-018	J Wainwright	12	I would question why it is Cherwell's responsibility to solve Oxford City's housing problems and despoil its precious countryside in the process when there appears to be no shortage of brownfield sites ripe for development in Oxford.	
PR-A-018	J Wainwright	16	There is already frequent congestion, sometimes severe, on the main roads through Cherwell. In Kidlington residential roads are increasingly being used as 'rat runs', with all the dangers that implies. A massive increase in housing to the levels projected would produce intolerable congestion to the area's through roads and in the vicinity of any large housing development, to which the Highways Authority's present insubstantial objectives offer little hope of a solution.	
PR-A-018	J Wainwright	24	The number of houses being projected would be a serious threat to the rural environment of Cherwell. Once Kidlington and other villages start extending to take over precious countryside, the process would be inexorable. The countryside around us is an amenity much valued by local residents and is also essential for the conservation of wildlife. To take Kidlington alone, there is a great variety of fauna in the fields around: foxes, badgers, grass snakes, water voles, great crested newts and many species of bird. It would be irresponsible to put these habitats at risk. Ours is a small country and we must not deprive our descendants of the countryside that remains by concreting it over.	
PR-A-019	Bloombridge	3	In terms of who will be engaged, we suggest that Cherwell will receive better information on the deliverability of sites and 'market signals' by holding a "Developers' Forum", to be attended by agents, housebuilders and commercial developers. If this forum reviews the demand side, it would also be useful to run a "Constraints & Opportunities" Workshop in parallel to help define the strategic inputs to the new spatial plan. The ideal is to identify locations with high demand/need with (relatively) low environmental impact; better still if regeneration or other community opportunities can be added in as well. This 'high level' approach will help set priorities and bring early clarity to the possible options, avoiding 'analysis paralysis'.	<p>General Comment: It would be helpful for the SA to be nuanced in order fully to allow for Green Belt policy, such as the 'Strategic Gaps'. The reason for this is that SA's tend to deal with qualitative criteria, which can often understate the importance of 'Strategic Gaps', including with regard to their importance to the local community and to the resilience of the Green Belt as a whole.</p> <p>In a similar vein, Kidlington is plainly a settlement that could benefit from growth associated with Oxford, particularly in relation to the regeneration of its town/village centre. The initial work by Alan Baxter produced an interesting and widely consulted upon Master Plan, that needs to be brought out in the general themes of the SA. There are, in short, some obvious places in the district where growth needs to be harnessed.</p>
PR-A-019	Bloombridge	28	Site submission - Land North of The Moors, Kidlington	
PR-A-020	South Oxfordshire and Vale of White Horse District Councils	General	<p>Thank you for the opportunity to respond to the Partial Review of the Cherwell Local Plan (Part 1): Oxford's Unmet Housing Need – Issues Paper consultation. We note Cherwell's positive and proactive approach to working with partner authorities in Oxfordshire to consider how Oxford's unmet housing need is addressed.</p> <p>We note that Cherwell District Council is planning to publish an 'Issues and Options Consultation' in autumn 2016 following the work of the Oxford Growth Board, once the apportionment of Oxford's unmet housing need has been identified. The Vale of White Horse and South Oxfordshire District Councils look forward to continuing to work positively with Cherwell District Council and the other Oxfordshire authorities to assist with this process.</p>	
PR-A-021	J East	1	No. It is derived from the Oxfordshire SHMA which has been accepted by the Council without serious independent scrutiny. The SHMA was drawn up by private consultants who largely work for the development industry and therefore have a conflict of interest. Its figures are much too high, far in excess of previous trends and clearly unrealistic. I do not accept that the SHMA figures represent either Cherwell's or Oxford's needs.	
PR-A-021	J East	2	No. The excessive housing figures are based on unrealistic forecasts of growth in employment. To provide for yet more employment generating development is simply creating a vicious circle.	

PR-A-021	J East	9	Most definitely not. The Green Belt is a permanent designation and is much valued around Kidlington. National Policy says that housing need is not a reason to build on the Green Belt and, furthermore, the Government, in its manifesto, made a commitment to the electorate to protect the Green Belt.
PR-A-021	J East	16	Transport networks in this area are already overloaded. I do not believe that current proposals will solve existing problems, let alone those caused by additional growth in Cherwell and elsewhere in the County. The Highway Authority's vision and objectives, that you quote, are vague aspirations and without substance.
PR-A-021	J East	24	Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will unquestionably further damage the natural environment of Cherwell.
PR-A-022	Savills / New College	1	It appears to be acknowledged that there is a need for around 15,000 more dwellings to meet the housing need. As noted this equates to about 3,000 for each local authority on a simple split approach. The ability of each authority to absorb the need will vary but if there is suitable land at Cherwell to meet its share or an increased share such as 3,500 (or possibly more) then provided it can be provided in a sustainable way Cherwell should provide for the capacity it could deliver.
PR-A-022	Savills / New College	2	In providing a sustainable community there has to be a mix of uses. It is not appropriate merely to provide dormitory residential zones which merely lead to extensive commuting for work, recreation and normal living activities such as shopping and schools. New development should be directed to areas where there are suitable communities and amenities, including employment opportunities, where possible.
PR-A-022	Savills / New College	4	The creation of balanced new communities over the period of the plan (to 2031) that do not impose unreasonably on established settlements.
PR-A-022	Savills / New College	6	Whilst the focus is inevitably Oxford with its scale and importance as a regional centre due to the major M40 corridor through the District and other key communication links such as the rail corridors and other major settlements from London to Birmingham and Milton Keynes etc the Oxford focus should not be the sole driver in the search for sites. There is a regional issue and the adjoining SHMA areas have also identified the pressures for additional development.
PR-A-022	Savills / New College	8	A District wide area of search is appropriate however an initial sieve map approach will no doubt quickly rule out certain areas due to environmental constraints or the lack of infrastructure.
PR-A-022	Savills / New College	9	Green Belt is merely a planning imposed constraint however over many decades the Green Belt has provided a useful function in containing sprawl and ensuring protection for the environment within the designations. If there are opportunities to jump the green belt to help deliver the necessary housing and associated development these should be explored before the Green Belt is reviewed.
PR-A-022	Savills / New College	10	The partial review is for the period to 2031 and the delivery of housing should be assimilated with the delivery identified in the recently adopted plan to deliver housing on an overall basis. It is not appropriate to separately identify the need arising from the Oxford unmet need in a separate way. The overall District delivery level has to be increased to reflect the need.
PR-A-022	Savills / New College	11	The overall housing delivery target should be managed as one. If not the integration of the new housing and communities will not be satisfactory. It is not realistic to separately define housing being developed to meet the Oxford issue and separately that for the Cherwell Local Plan.

PR-A-022	Savills / New College	12	<p>My client owns land at Upper Heyford within and adjoining the existing allocation. This site has been a major focus of employment for the local community in the centre of the District since it was developed as the major strategic cold war airbase. It has extensive employment opportunities. Also it has the benefit of Lower Heyford station close by which could be developed to enhanced links to Oxford. Also with very limited highway improvements a prime link to the M40 (Junction 10) and A34 to Oxford can be created with only minimal disturbance to the community as the current road passes along the eastern edge of Ardley on the B430.</p> <p>The growth potential of this location has already been noted and this can easily be expanded without significant further impact to make best use of the infrastructure already being built for the allocated community. An additional allocation would merely be an extension of the scheme already being brought forward creating a desirable new community.</p>
PR-A-022	Savills / New College	15	<p>The environmental assessment for the adopted Local Plan identified that there was scope for further expansion to the south of the Upper Heyford allocation and this was further acknowledged by the expansion of the allocation into part of this land. Attached hereto is a plan showing coloured pink and blue which can be integrated with the Dorchester Land promotion of the current allocation and well landscaped into the new Heyford Park community whilst providing a significant development area to help meet the need.</p>
PR-A-022	Savills / New College	16	<p>Upper Heyford has excellent links to Junction 10 on the M40 which can be improved without any significant impact on the rural community. It also has Lower Heyford station close by which could be enhanced to provide good links for the scheme and surrounding villages.</p>
PR-A-022	Savills / New College	18	<p>infrastructure at Heyford Park is being provided which serves not only the new community but also the surrounding rural settlements. Expanding the scale of the development over the life of the Local Plan would further enhance the local offer.</p>
PR-A-022	Savills / New College	20	<p>Upper Heyford has been a major employment location in the District for many years. This can be utilised to create a dynamic third major settlement in the District after Banbury and Bicester.</p>
PR-A-022	Savills / New College	22	<p>As a new community Heyford Park is being developed as a sustainable development and community. If it is further expanded then this attribute will only be enhanced.</p>
PR-A-022	Savills / New College	28	<p>Site submission - Land South of Upper Heyford. See site at Upper Heyford submitted separately.</p>
PR-A-023	Oxford Brookes University	12	<p>On behalf of Oxford Brookes University, I should like to express our support for these plans. The proposals seem sensible and realistic, and would provide a partial solution to Oxford's chronic shortage of affordable housing</p> <p>Therefore I am happy to express our warm support for these plans.</p>

PR-A-024 Framptons / DB
Symmetry 2 and 20

Although the document makes reference to the national policy context (paragraphs 5.77-5.80), neither the Cherwell Context, nor the Oxford Context display any comprehension of the spatial interface between manufacturing and the logistics sector. As stated in the accompanying Baker Rose report (paragraph 2.5):

2.5 The logistics industry is crucial to the economic well being of an economy. It is also crucial to the success of individual businesses and of course, the end consumer. It is not simply the movement and distribution of goods. The Supply Chain now includes the production, storage and distribution of materials, parts, sub-assemblies and completed products, as well as returns, recovery, re-use and recovery. Logistics encompasses the complete process from raw material through production, to delivery to the end consumer; and back, as returns or for recycling, recovery or re-use.

Baker Rose makes the telling point that (paragraph 2.6):

'Whilst the average consumer may be oblivious to complexity behind the receipt of a new product, this should not be the case for policy makers'.

This linkage between logistics and manufacturing is explained in the function of Tiers. Paragraph 3.2 states:

3.2 The 'tiers' referred to are the level of closeness in contract terms a supplier is to the original equipment manufacturer (OEM). Raw material is Tier 4, a supplier of individual bits, Tier 3, a supplier of the part made from bits, Tier 2 and the supplier of various parts ready assembled as a unit, Tier 1. Tier 1 suppliers will deliver direct and usually sequenced into the production line. (cont....)

PR-A-024 Framptons / DB
Symmetry 2 and 20

(cont....) In Cherwell and Oxford the interface between manufacturing and logistics is amply demonstrated through the automotive manufacturing industry. Paragraphs 7.1-7.3 state:

7.1 In practice the automotive manufacturing industry has led on destocking its supply chain to the point of manufacture (and increasingly on premium products, its stock of finished products too). Just in time and the reliance on Tier 1 suppliers with tight delivery windows and huge penalties for failure, has put pressure on demand for 'large shed' space with very good access to the OEM's centres of production.

7.2 For the Tier 1 & 2 suppliers the two major drivers for success in the UK are now the consolidation of production to increasingly efficient and larger facilities; and the development of leading edge Research & Development capacity.

7.3 We see this as a very important future demand for Cherwell. The existing concentration of very high quality R&D can and should lead to a growth in demand for Tier 1 & 2 suppliers, both to the established and growing specialist business, but also for those serving the major OEM's – with ready access to Oxford and the West Midland based OEM's. Easy access to the M40 will therefore be key.

In considering additional housing in Cherwell to meet Oxford's needs, it is therefore essential that the Partial Review also considers additional employment generating development. Paragraph 11.5 of the Baker Rose report states:

11.5. Key motorway locations will have significant economic importance for Cherwell, the wider region and indeed the UK economy, as it is rebalanced with more manufacturing, whilst also accommodating the changes in distribution caused by multi-channel retailing. (cont....)

PR-A-024 Framptons / DB
Symmetry 2 and 20

(cont....) Cherwell District is encouraged to become proactive in rapidly understanding the market demand for large scale buildings closely related to the M40 which are needed to serve the locational requirements in the manufacturing and distribution logistics industries. If this is not to be taken forward through the Part 2 Local Plan Process (as Paragraph 4.7 of the Part 2 Issues Consultation DPD suggests), then it is imperative that the economic benefits and opportunities offered by the logistics sector are pursued through a focused review of Part 1 of the Local Plan at the earliest opportunity to proactively meet the economic needs of the District.

PR-A-025	Chiltern Railways	N/A	<p>The Chiltern Railway Company Limited ("Chiltern Railways") operates franchised passenger train services between London Marylebone, Aylesbury Vale Parkway and Birmingham Moor Street, plus associated branch lines. In Cherwell District we operate Banbury, Bicester North, Bicester Village, Islip and Oxford Parkway stations. The stations on the Bicester to Oxford line were opened in October 2015 as part of a £130m investment to upgrade the line and provide the first route between a British city and London in over 100 years. The Chiltern Railways franchise is due to expire in 2021.</p>
PR-A-025	Chiltern Railways	17	<p>General - Chiltern Railways welcomes the opportunity to respond to Cherwell District Council's consultation on Oxfordshire's unmet housing needs. In particular, we are pleased to see an emphasis on locating development in sustainable locations in transportation terms and managing patterns of growth to make the fullest possible use of public transport.</p> <p>Chiltern Railways would like to see growth in Cherwell District that is sustainable and which properly takes account of the infrastructure needs of a growing population. We support a policy of building houses within walking distance of our railway stations in Cherwell District to connect new residents to employment, education and leisure opportunities within the wider region.</p>
PR-A-025	Chiltern Railways	9	<p>Specific - Whilst we agree with the principles of the Green Belt in preventing urban sprawl and the coalescence of settlements we believe there is a case for a partial review of the Oxford Green Belt in the Kidlington area. The location is a major transport interchange with the new Oxford Parkway Station as well as the Water Eaton Park and Ride and the A34. The sympathetic location of housing here would fulfil the criteria of housing being developed adjacent to sustainable transport options.</p> <p>Therefore, Chiltern Railways supports carefully considered housing in the Oxford Green Belt around Oxford Parkway and Kidlington. Oxford Parkway station has excellent links into Buckinghamshire and central London and from December 2016 will be approximately a 7 minute journey from Oxford Station. The completion of East-West Rail will provide future connectivity to Reading, Milton Keynes, Bedford, Cambridge and Norwich making Oxford Parkway one of the best connected stations of its size in the country. The station and its facilities has been constructed with sufficient capacity to support growth in the local area.</p> <p>In areas where large new housing allocations are provided which are not served by railway stations, Chiltern Railways supports the provision of bus links, cycle paths and pedestrian access from houses to stations. Chiltern is happy to engage on this subject and ensure that sufficient space is provided at these stations to accommodate these modes of transport and provide an effective transport interchange.</p> <p>At railway stations where housing growth is planned it would be wise to use developer funding to improve amenities for passengers. This would be particularly relevant at Bicester North and Banbury stations. We would suggest that it is preferable to improve infrastructure in anticipation of growth rather than after. Chiltern Railways would be happy to work with Cherwell District Council to help specify the potential upgrades that would benefit from developer funding.</p>
PR-A-025	Chiltern Railways	N/A	<p>Conclusion- We are happy to have further discussions to help Cherwell meet its duties on growth and engage on any of the matters discussed in this letter.</p>
PR-A-026	Thames Water Utilities Ltd	18	<p>General Comments - Based on the level of information provided, we are only able to provide high level comments at this stage. As the site allocation process progresses and further certainty and clarification on draft allocations is gained we would like to work more closely with the Council to understand the impact this will have on both our water and wastewater network and treatment works.</p>

PR-A-026 Thames Water Utilities Ltd	18	<p>19 Water Supply - In general terms we have no major concerns around the ability to support an additional 3,500 properties (or equivalent) over and above those previously identified within the Local Plan Part 1 and which have been previously commented on. Our preference would be for additional growth to be focused in either Banbury, Kidlington and to a lesser extent Bicester.</p> <p>Banbury - We are currently delivering a reinforcement main to Banbury. This will ensure strategic supplies to this area will be secured for at least the next 40 years. Local reinforcements may still be required, and we will need to review the storage capacity of our Bretch Hill reservoir to ensure sufficient resilience is provided to customers in the even of an asset failure.</p> <p>Kidlington - Kidlington has adequate strategic infrastructure, and as such any proposed development in this area should only require local reinforcements.</p> <p>Bicester –Thames Waters alliance partnership Eight2o are currently carrying out a study which will determine the strategic transfer requirements for the area over the next 40 years. (cont....)</p>
PR-A-026 Thames Water Utilities Ltd	18	<p>(cont...) If growth is greater than previously predicted for Bicester, additional water supply upgrades may be required to our infrastructure than previously envisaged. This work will need to be fed into and form part of the Business Planning process. We will also need to review the capacity of our Ardley reservoirs (as at Bretch) to ensure security of supply to existing and future customers can be maintained.</p> <p>Additional housing being located around the villages will require a case by case review. Villages tend to be located at the end of networks and as such if any strategic upgrades are required to supply new development, these upgrades could take significant time to implement due to the distances involved.</p>
PR-A-026 Thames Water Utilities Ltd	18	<p>Waste Water - Banbury - Our alliance partnership Eight2o have been instructed to design a scheme to deliver major infrastructure upgrades to the south of Banbury. The scheme will be designed to prevent sewage flooding and relieve existing pressures on sewer network capacity between Bodicote and Adderbury Sewer Pumping Station</p> <p>Bicester - Thames Water recognise a requirement for sewerage infrastructure upgrades to cope with the demand from new developments which are being envisaged in Bicester. As such if further development is proposed in and around Bicester, upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is available ahead of any development.</p> <p>Former RAF in Upper Heyford - Both sewerage network and waste water treatment capacity will need to be upgraded to cater for the scale of development envisaged. A strategic wastewater infrastructure solution will be required to serve the scale of development proposed.</p>
PR-A-027 Quod / Albion Land	2	<p>These Representations, with reference to the information enclosed at Appendix 2, provide conclusive evidence that the Site through its allocation within the Local Plan Part 1 Review will:</p> <ul style="list-style-type: none"> - Provide a deliverable development option capable of meeting a specific market requirement for very large scale logistics buildings that cannot be met through existing Local Plan allocations (set out in Part 1 of the Local Plan); - Provide new employment opportunities to assist in sustaining the 3,500 additional homes proposed through Local Plan Part 1 Review to help address the unmet housing need of the Oxfordshire HMA; - Be satisfactorily (both safely and within the capacity of the highway infrastructure) accessed via the existing road network; - Be appropriately accommodated without any unacceptable impact on ecology and through the application of appropriate design and landscaping treatment could deliver potential biodiversity improvements; (cont...)

PR-A-027	Quod / Albion Land	2	<p>(cont...) - Be accommodated within the surrounding landscape without unacceptable harm through the incorporation of appropriate design measures; and</p> <p>- Be sustainable in flood risk and drainage terms and can be appropriately accommodated without harm to future users from potential sources of contamination.</p> <p>The Site represents a deliverable and sustainable development option that is well placed to address a specific and unmet market requirement and will support the additional planned residential growth across the HMA.</p>
PR-A-027	Quod / Albion Land	2	<p>a) National Policy Context-</p> <p>The presumption in favour of sustainable development is central to national planning policy, being seen as a 'golden thread' that runs through plan making (NPPF, Paragraph 14).</p> <p>For Cherwell this means positively seeking opportunities through the Local Plan process to 'meet the development needs of an area' (NPPF, Paragraph 14). Through the Local Plan (Part 1 and Part 2) 'every effort should be made objectively to identify and then meet the business and other development needs of an area, (NPPF, Paragraph 17) whilst remaining 'flexible' in order to rapidly respond to changes not anticipated in the Plan (NPPF, Paragraph 21).</p> <p>The Plan should be 'aspirational but realistic' (NPPF, Paragraph 154), and the policies that it sets must be made 'deliverable' in order to achieve sustainable development (NPPF, Paragraph 173).</p> <p>There is an emphasis in the planning system on 'supporting sustainable economic growth' which should be reflected in the Local Plan Part 1 Review and through the Local plan Part 2 'affording more weight to supporting economic growth' (NPPF, Paragraph 19). (cont...)</p>
PR-A-027	Quod / Albion Land	2	<p>(cont...) The Plan should help secure economic growth to 'create jobs and prosperity' (NPPF, Paragraph 18). Cherwell should through Part 2 of the Plan 'plan proactively to meet the development needs of business and support an economy fit for the 21st century' (NPPF, Paragraph 20).</p> <p>In order to achieve sustainable development, the NPPF advises that economic, social and environmental gains should be sought jointly and simultaneously through the planning system. This means ensuring that new housing is delivered in locations that are well served by employment and community uses and infrastructure.</p> <p>Every effort should be made through the Local Plan to 'objectively identify and then meet the needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of business communities' (NPPF, paragraph 17). (cont...)</p>
PR-A-027	Quod / Albion Land	2	<p>(cont...) In accordance with paragraph 160 of the NPPF, local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area and should use this evidence base to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. 'Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land' (NPPF Paragraph 161).</p> <p>In order to be deemed 'sound' Paragraph 182 of the NPPF indicates that the Plan must be (i) positively prepared i.e. through seeking meet objectively assessed development and infrastructure requirements; (ii) justified in its strategy when considered against the alternatives and taking account of the evidence available; (iii) effective in 'delivering' development and (iv) consistent with national policy and the delivery of sustainable forms of development. (cont...)</p>

PR-A-027	Quod / Albion Land	2	<p>(cont...) b) Local Policy Context- i) Adopted Local Plan Part 1</p> <p>The Cherwell Local Plan Part 1 contains the Council’s proposed strategic planning polices and allocations and was adopted in July 2015.</p> <p>Policy SLE1 (Employment Development) was the subject of a number of modifications over the course of the Plan consultation and Examination process and was modified following the Local Plan Examination hearing sessions in December 2014 to include the following additional provision:</p> <p>‘In response to market signals for very large scale logistics buildings, which may not be suitably accommodated on the allocated sites within Part 1 of the Local Plan the Council will examine options for the release of land at Motorway junctions in the District within Part 2 of the Plan for this form of development.’</p> <p>The Inspector determined however, that there was insufficient evidence available at that stage to justify the modification to the Policy and recommended it be removed.</p> <p>The Part 1 Plan was adopted in July 2015 without the above modification. (cont...)</p>
PR-A-027	Quod / Albion Land	2	<p>(cont...) ii) Local Plan Part 1 Review</p> <p>During the Examination into the Local Plan Part 1 Cherwell acknowledged that OCC is unable to meet ‘in full’ its own housing needs and there would be a need for adjoining authorities including the Council to commit to accommodate some of the identified unmet need through an early review of the Plan.</p> <p>The Inspector appointed to carry out the Examination into the Local Plan Part 1 requested the Council commit to work jointly with the other Oxfordshire Local Authorities to address the objectively assessed need for housing across the Oxfordshire HMA and for this to be recorded within the Local Plan Part 1. As such, paragraph B.95 of the adopted Local Plan notes that the ‘joint work will need to comprehensively consider how spatial options could be supported by necessary infrastructure to ensure an integrated approach to the delivery of housing, jobs and services.’ (cont...)</p>
PR-A-027	Quod / Albion Land	2	<p>(cont...) The Oxfordshire Strategic Housing Market Assessment (SHMA) (2014) identifies a mid-point housing need for OCC of 28,000 homes over the period of 2011 – 2031. In comparison OCC’s Strategic Housing Land Availability Assessment (SHLAA) (2014) identifies sufficient land to provide just 10,212 dwellings over this Plan Period. Whilst the assessment of potential supply has not been completed and there remain conflicting views on the level of need that cannot be met by the Authority, the Oxfordshire Councils have agreed a working assumption of 15,000 homes for Oxford’s City’s unmet need.</p> <p>These representations do not comment on the appropriateness of the SHMA methodology or the scale of the identified unmet housing need.</p> <p>The Oxfordshire Councils have assumed that the unmet need should be distributed between the constituent authorities whilst taking account of their spatial characteristics. In this context a partial review of the Cherwell Local Plan Part 1 is necessary. (cont...)</p>

PR-A-027 Quod / Albion Land	2	<p>(cont...) The Council has published a consultation document (Cherwell Local Plan Part 1 Partial Review –Issues Consultation (hereon in referred to as ‘the Issues Consultation’) which represents the first stage in the Local Plan Part 1 Partial Review and requests views on the issues to be considered as part of the Review. The Council are also inviting the submission of sites with the potential to deliver housing development within the District.</p> <p>In terms of additional housing development, the Issues Consultation suggests that Cherwell will help to accommodate 3,500 of Oxford’s unmet housing need. The Issues Consultation goes onto question (‘Question 2’ of the Issues Consultation Document) whether the ‘additional housing in Cherwell to meet Oxford’s needs should be supported by additional employment generating development’.</p> <p>Whilst the Council have not requested non-residential sites be submitted through the Issues Consultation, these representations conclude that there is a need to identify new employment locations to support the proposed housing growth in Cherwell in a sustainable manner and that the land at Junction 10 of the M40 is a suitable employment development option that meets a specific and unmet market demand and is therefore ‘deliverable’.</p> <p>The Site merits allocation for employment use within the Local Plan Part 1 Review. (cont...)</p>
PR-A-027 Quod / Albion Land	2	<p>(cont...) iii) Local Plan Part 2 Issues Paper</p> <p>In addition to the Issues Consultation on the Local Plan Part 1 Review, the Council are consulting on a Local Plan Part 2 Issues Paper.</p> <p>The Local Plan Part 2 will cover the entire District and the same Plan Period as Part 1 and will conform with and build upon the Spatial Strategy of Part 1.</p> <p>The Local Plan Part 2 will contain detailed planning policies to assist the implementation of strategic policies and the development management process. It will also identify smaller, non-strategic development sites for housing, employment, open space and recreation, travelling communities and other land uses.</p> <p>Consultation on the scope of the Local Plan Part 2 was undertaken in May 2015 and the responses to that consultation informed the preparation of the Issues Paper. (cont...)</p>
PR-A-027 Quod / Albion Land	2	<p>(cont...) Albion Land provided representations in response to that consultation and a copy of the representations is provided at Appendix 2.</p> <p>The representations were submitted in response to the Council’s previous proposal for Part 2 of the Local Plan to ‘examine options for the release of land at motorway junctions for large scale logistics development’ which was at that time supported by the proposed Main Modifications to Policy SLE1 of the then draft Local Plan Part 1 (see above).</p> <p>Albion Land’s representations to the Local Plan Part 2 demonstrated a need for new land to accommodate specific very large scale logistic operator’s requirements in such locations and demonstrated that land within their control at Junction 10 of the M40 is a sustainable location capable of accommodating this need.</p> <p>However, the Inspector appointed to examine the Local Plan Part 1 concluded that it was inappropriate to deal with the requirement through the proposed modification at that moment in time. (cont...)</p>

PR-A-027 Quod / Albion Land	2	<p>(cont...) As such, the Local Plan Part 2 Issues Paper does not provide any policies to support very large scale logistics premises at motorway junctions albeit does indicate that further assessment on the requirement for such sites is being carried out.</p> <p>The Council have appointed GVA Grimley to assess this need and their report is to be published shortly.</p> <p>In the absence of the GVA report these representations draw on market evidence submitted to the Council as part of Albion Land's representations to the Local Plan Part 2 consultation (provided at Appendix 2) which demonstrate a strong need for new employment land within the District to meet the requirements of very large scale logistics operations.</p> <p>These representations demonstrate that this evidence is sufficient to justify the allocation of additional sites through the Local Plan Part 1 Partial Review which will in turn assist in sustaining the planned additional housing growth for the District.</p>
PR-A-027 Quod / Albion Land	2	<p>a) Policy Requirement- OCC is unable to meet 'in full' its objectively assessed housing needs.</p> <p>The Oxfordshire Strategic Housing Market Assessment (SHMA) (2014) identifies a mid-point housing need for Oxford City of 28,000 homes over the period of 2011 – 2031. In comparison OCC's Strategic Housing Land Availability Assessment (SHLAA) (2014) identifies sufficient land to provide just 10,212 dwellings over this Plan Period.</p> <p>Whilst the assessment of potential supply has not been completed and there remains conflicting views on the level of need that cannot be met by OCC, the Oxfordshire Councils have agreed a working assumption that the unmet need is in the order of 15,000 dwellings.</p> <p>The Oxfordshire Councils have assumed that the unmet need should be distributed between the constituent authorities whilst taking account of their spatial characteristics.</p> <p>In response and in accordance with the Council's commitment within their Local Plan Part 1, Cherwell have committed to a partial review of the Cherwell Local Plan Part 1. (cont...)</p>
PR-A-027 Quod / Albion Land	2	<p>(cont...) In terms of additional housing development, the Issues Consultation on the Local Plan Part 1 Review suggests that Cherwell will help to accommodate 3,500 of Oxford's unmet housing need.</p> <p>In order to ensure that the additional residential growth is sustainably accommodated, there is a need to identify additional land for infrastructure, community and employment uses to support the new population.</p> <p>In this context there is a pressing need to identify new and deliverable employment locations through the Local Plan Part 1 Review and non-strategic employment sites through the Local Plan Part 2.</p> <p>These representations demonstrate that the subject Site is both sustainable and environmentally appropriate for redevelopment and given its scale and strategic significance is appropriate for allocation through the Local Plan Part 1 Review.</p> <p>Furthermore, the Site can meet a specific and strong market requirement for very large scale logistics operations and as such is a viable and deliverable development option capable of being brought forward within the Plan Period.</p>

PR-A-027 Quod / Albion Land	2	<p>(cont...) b) Market Demand- Albion Land's representations to Cherwell Local Plan Part 2 provided market commentary from JLL on the growing demand for very large scale logistics facilities nationally as well as evidence on the limited supply of land and buildings within Cherwell to meet the need.</p> <p>This evidence remains unchanged since June 2015 and is valid for the purpose of these representations.</p> <p>The market evidence is re-provided at Appendix 2 of these representations and demonstrates the pressing needs to examine options for the release of additional sites to meet the demand. The provision of new employment sites in response to this particular identified market requirement will make a positive contribution towards sustaining the proposed additional residential growth proposed through the Local Plan Part 1 Review. (cont...)</p>
PR-A-027 Quod / Albion Land	2	<p>(cont...) The Site at Junction 10 of the M40 is well placed in market terms to attract very large scale logistics operators occupying a key location adjacent to Junction 10 of the M40. This gives the Site a truly strategic location with immediate access to the London and M25 markets south on the M40, Birmingham and the Midlands to the north and to the M1 via the A43. The Site's prominence and visibility from the M40 motorway sets it apart from other potential motorway sites in the area being an additional attraction to the larger retailers.</p> <p>Appendix 2 of the representations demonstrate that those employment sites allocated within the adopted Local Plan Part 1 are identified with the aim of meeting a specific operator or market requirement and have not sought to address the growing demand for large scale logistics buildings. In many instances the existing allocations are either too small or inappropriately located away from motorway junctions to meet the specific requirements of such operators.</p> <p>As outlined in Appendix 2, Cherwell is well placed to capitalise upon the national growth in demand for very large scale logistic buildings not least due to the M40 motorway and its excellent access to the wider motorway network and national markets. These motorway locations are sustainably located within easy commuting distance of the towns of Bicester and Banbury which, due to the presence of existing infrastructure and services are likely to be the focus of the majority of additional residential growth. (cont...)</p>
PR-A-027 Quod / Albion Land	2	<p>(cont...) The market evidence demonstrates that Cherwell is well placed for these types of facilities and that the subject Site is appropriate in market terms to help accommodate the identified need.</p> <p>c) Proposed development- The Site shown at Appendix 1 is proposed for allocation for Class B8 very large scale logistics buildings within the Local Plan Part 1 Review.</p> <p>As indicated in Albion Land's representations to the Local Plan Part 2 consultation, the Site is capable of delivering in the order of 232,258 sqm (2.5m sq ft) of Class B8 employment floorspace.</p> <p>The Site also allows for the delivery of landscape areas within and on the edges of the Site, the biodiversity benefits of which are explained within Appendix 2.</p> <p>d) Deliverability- The Site is being promoted for allocation by Albion Land via a joint venture agreement with the landowner of part of the Site and the remainder of the Site is subject to a tenancy with a rolling break option and as such does not constrain delivery. (cont...)</p>

PR-A-027	Quod / Albion Land	2	<p>(cont...) The Site is viable and deliverable and capable of being brought forward in the early phases on the Plan Period.</p> <p>There are no known constraints that will prevent the deliverability of the Site.</p> <p>e) Environmental Appropriateness- The representations provided to the Local Plan Part 2 consultation (Appendix 2) demonstrate that the subject Site is environmentally suitable to help accommodate the identified demand for very large scale logistics buildings, being characterised by land of limited ecological value.</p> <p>The Site does not present any constraints on development in relation to flood risk, drainage and ground contamination that cannot be appropriately overcome through mitigation or appropriate design.</p> <p>There is the ability through the incorporation of set-back distances and landscaping areas to effectively and appropriately accommodate development within its landscape setting. (cont...)</p>
PR-A-027	Quod / Albion Land	2	<p>(cont...) An appropriate and safe vehicular point of access from the public highway can be achieved and traffic associated with the development is capable of being accommodated within the existing highway network without significant impact upon the safe and free flow of traffic.</p> <p>There is the potential through careful consideration to design, site planning and the inclusion of boundary landscaping, to reduce potential landscape and visual impacts to an acceptable level.</p> <p>In this respect, the Site is compliant with the development management principles of the adopted Local Plan Part 1 as set out in Appendix 1.</p>
PR-A-027	Quod / Albion Land	2	<p>(cont...) These Representations demonstrate that the subject Site is suitable and deliverable for very large scale logistics buildings.</p> <p>There is a strong demand for new employment sites to help meet this specific sectoral demand which require identifying through the Local Plan process.</p> <p>The need to identify new employment sites and deliver new employment opportunities for Cherwell is all the more important in the context of the Council's Local Plan Part 1 Review and the identified need for Cherwell to accommodate in the order of 3,500 new homes across the District.</p> <p>The subject Site has the ability through its allocation within the Local Plan Part 1 Review to assist the Council in meeting the identified market demand for very large scale logistics premises and in realising the significant economic and social benefits that such development will bring. (cont...)</p>
PR-A-027	Quod / Albion Land	2	<p>(cont...) The Site occupies a sustainable location within easy access of the main population centres of Bicester and Banbury and on development will deliver a significant number of jobs for the existing and proposed local populations.</p> <p>In summary, the Site is appropriate for allocation in the Local Plan Part 1 Review given that it:</p> <ul style="list-style-type: none"> - Provides a sizeable development area which is deliverable from the start of the plan period and capable of making a meaningful contribution towards accommodating an identified need for large scale logistics buildings; - Will provide new and substantial job opportunities to help sustain the proposed increase in residential population within easy access of the existing population nodes of Bicester and Banbury; and - Can be appropriately accommodated within the existing environment without any significant adverse impact upon the highway network, existing habitats, flood risk, ground conditions and landscape character. <p>In these circumstances the Site merits allocation within the Local Plan Part 1 Review.</p>

PR-A-027	Quod / Albion Land	2	Site submission - Junction 10 of M40.
PR-A-028	V N Smith	1	To aim for a growth of almost 23,000 new houses by 2031 is very daunting task. To propose an increase of 3,500 houses is farcical. It is already apparent that the road system is inadequate for the current level of traffic. There are also concerns about the infrastructure whether in Health Services or Education. It is to the Council's credit that some roadworks are in progress and a review is intended but a major increase in highways in Cherwell and on routes to Oxford is needed now.
PR-A-028	V N Smith	2	As there are already numerous empty shops, offices and industrial units which have been unused for years there must be a case to move jobs from Oxford to Banbury to occupy the vacant buildings. The same issue doubtless applies to Oxford. Banbury is already taking steps to redevelop empty premises. What is the situation in Oxford? Before any attempt is made to force Cherwell to deal with Oxford's problems I would expect that a comprehensive review of vacant land and buildings should be undertaken in and around Oxford.
PR-A-028	V N Smith	3	Oxford's key issue is stated to be a need for more houses. The first question that should be asked is whether the target is wrong. What criteria were used to determine the figure,. Another the spare space or empty premises which exist in and around Oxford? If to build more homes in Cherwell even more green fields will have to be built on, then the 'green belt' around Oxford should be considered.
PR-A-028	V N Smith	4	Because of the existing road problems both in Cherwell and routes to Oxford any additional houses should have ready access to public transport. With that may come the need for extra parking at rail and bus stations and Park and Ride points.
PR-A-028	V N Smith	5	One suggestion to ease Oxford's problems would be to re-locate businesses to empty units elsewhere. Another to re-examine any land in Oxford not reserved for sport. The key principle to be followed must be to ensure that any new housing sites selected should be in sustainable locations. To quote the approved district plan "development in the countryside will be strictly controlled and directed towards larger more sustainable villages which offer a wide range of services and are well connected to urban areas by public transport" (para A11 page 29 refers).
PR-A-028	V N Smith	6	The area of search should be within 5 miles of Oxford or within easy reach of frequent public transport where there is plenty of parking.
PR-A-028	V N Smith	9	The Oxford green belt must be considered if green fields in Cherwell are to be built on. At least if houses are built in Oxford's green belt journey time to Oxford would be reduced.
PR-A-028	V N Smith	10	Although sites may be suggested anywhere in Cherwell priority should be given to locations within 5 miles of Oxford City boundary.
PR-A-028	V N Smith	11	As there are already severe traffic problems and doubts about infrastructure and services, such as healthcare and education, any increase in the rate of development will only worsen the situation.
PR-A-028	V N Smith	12	It is forecast that there will be continued growth in internet and out of town shopping during the next few years. Add to that the shops which are already vacant, plus offices and other premises, there will be plenty of opportunity to convert such premises to houses. Such locations could be suitable for affordable houses or flats. In addition as suggested in the planning document (page 31, para 5.15) there is a need for more sheltered housing for older people to free up homes for families. Such developments must be near public transport.
PR-A-028	V N Smith	13	If Cherwell District Council is having to build houses for Oxford a financial contribution should be made towards additional costs incurred in the process and infrastructure.
PR-A-028	V N Smith	14	Who has ruled that Oxford has unmet housing needs? Is it the same department that rejected Cherwell's plan so many times?
PR-A-028	V N Smith	15	No site should be in unsustainable location. All should be within easy reach of public transport links which should have adequate parking spaces.

PR-A-028	V N Smith	16+17	If any of Oxford's overspill is to be in Cherwell any uneconomic bus routes where building is planned must be funded by Oxford and remain open. Without adequate public transport links the severe traffic congestion will become even worse.
PR-A-028	V N Smith	18+19	Traffic congestion is already a serious issue. In the future education and the health service, especially availability of doctors in general practice will be a problem. When there is no rain for a time, Thames Water have introduced a hosepipe ban. It must therefore be established that this water company has sufficient capacity to cater for any more houses.
PR-A-028	V N Smith	20+21	Although several buildings which have been vacant for years are now being redeveloped it would help if some of the firms in Oxford could relocate to Cherwell and occupy empty offices or other vacant premises.
PR-A-028	V N Smith	22+23	Land owners in unsustainable locations will press for permission to build. Both the National guidance and the local plan are clear - "growth will be limited to sustainable villages and any development in the open countryside will be strictly controlled". Any such proposals should be rejected.
PR-A-028	V N Smith	24+25	In addition to preserving the natural environment I would expect the Planning Authority to prevent any building on flood plains near the Thames or Cherwell. I consider that to allow building is a criminal act as anyone who buys or inhabits such premises will find themselves in a position when they can neither repair, insure or sell the property. The misery so many people have suffered has been well documented in the media in recent times.
PR-A-028	V N Smith	26+27	Whilst I would expect that any building in or near historic locations should be in keeping with the surrounding environment, the possibility of retaining the outer shell and bringing such premises back into use should be considered. Before any houses are built for Oxford Council I would expect that steps will be taken to explore all possibilities to provide more homes or flats in Oxford by whatever means.
PR-A-028	V N Smith	7+8	Although a district wide search for places to build new homes should be resisted the stated need for so many new homes may make this inevitable. To achieve an increase of 22,000 houses by 2031 there must have been a very extensive search. The principle detailed in the approved local plan which are specified in the National plan should continue to be adhered to. Specifically that villages with no amenities should be excluded from any development.
PR-A-029	Astley / Gill / Jelfs / Barnes	1	Based on the information provided so far then the figure of 3500homes appears reasonable.
PR-A-029	Astley / Gill / Jelfs / Barnes	2	If the root cause is from those employed in Oxford or London, Reading or centres south of Oxford then the answer is no. If it relates to those commuting into Cherwell then again the answer is no.
PR-A-029	Astley / Gill / Jelfs / Barnes	3	Only those relating to those employed in Oxford City and wish to live there.
PR-A-029	Astley / Gill / Jelfs / Barnes	4	The key principle is to meet the needs of those who are employed in Oxford and cannot meet their affordable accommodation needs within Oxford and choose not to commute.
PR-A-029	Astley / Gill / Jelfs / Barnes	5	Similar to the vision of Cherwell but in locations sustainable close to their occupation.
PR-A-029	Astley / Gill / Jelfs / Barnes	6	Yes
PR-A-029	Astley / Gill / Jelfs / Barnes	7	How the Green Belt parcels of Land perform against the green belt criteria, environmental issues SEA, landscape value, availability of infrastructure.
PR-A-029	Astley / Gill / Jelfs / Barnes	8	We do not think that it is sustainable to contemplate making long commutes a policy.
PR-A-029	Astley / Gill / Jelfs / Barnes	9	Yes
PR-A-029	Astley / Gill / Jelfs / Barnes	10	Yes
PR-A-029	Astley / Gill / Jelfs / Barnes	11	The risk should be born by Oxford we only have a duty to co operate and the problem is theirs.

PR-A-029	Astley / Gill / Jelfs / Barnes	12	The issues set out appears reasonable and balanced. However it is inescapable that locations with good transport links and close to Oxford need to be pursued with some vigour. Consideration might be to spread the load amongst all village but some residents might have travel costs that are not sustainable.
PR-A-029	Astley / Gill / Jelfs / Barnes	13	The issue if how the residents of Cherwell react to further planning initiatives need to be born in mind because at the moment they feel let down by District Councillors.
PR-A-029	Astley / Gill / Jelfs / Barnes	14	The objectives should be the same as those for Cherwell but ensuring that travelling and its carbon footprint is kept to an absolute minimum. If further a field is considered improvements to Public Transport or greater use of the car will prevail making Oxford more inaccessible.
PR-A-029	Astley / Gill / Jelfs / Barnes	15	Clearly those location which reduce travel and keep it to a minimum.
PR-A-029	Astley / Gill / Jelfs / Barnes	16	The bus service from Banbury takes too long for commuters to Oxford and therefore the only sensible option is to improve rail services and perhaps bus services can act as feeders to stations opening more stations and using buses to call at more villages. Bus fare to Banbury from Adderbury is unrealistically high compared to the fare for Banbury to Oxford.
PR-A-029	Astley / Gill / Jelfs / Barnes	17	It is self evident that the root cause of Oxfords unmet need requires careful consideration and locations and density of dwellings suitable determined.
PR-A-029	Astley / Gill / Jelfs / Barnes	18	Schools and Health provisions need pre planning and implementation prior to development because the present crisis is a philosophy of let a problem occur then we will address it. There is a lack of confidence in planners.
PR-A-029	Astley / Gill / Jelfs / Barnes	19	Para's 5.73 to 5.73 seem balanced but we suspect that delivery of adequate infrastructure is a pipe dream that will not materialise and may limit growth.
PR-A-029	Astley / Gill / Jelfs / Barnes	20	Clearly given the difficulties of Oxford City then it may be necessary to limit its future growth.
PR-A-029	Astley / Gill / Jelfs / Barnes	21	Much in the same way as the issues above.
PR-A-029	Astley / Gill / Jelfs / Barnes	22	The issues explained in the consultation document are clearly explain and the solution in strategic terms is also simply provide highly efficient houses close to the need and that will provide sustainability.
PR-A-029	Astley / Gill / Jelfs / Barnes	23	They merely emphasise the solution.
PR-A-029	Astley / Gill / Jelfs / Barnes	24	Apart from the water meadows and environmental habitats .We are not aware of other issues.
PR-A-029	Astley / Gill / Jelfs / Barnes	25	Clearly some areas may be no go for development.
PR-A-029	Astley / Gill / Jelfs / Barnes	26	No because the document gives a clear image of the issues.
PR-A-029	Astley / Gill / Jelfs / Barnes	27	They may limit the future growth of Oxford along with the other factors and it may be necessary to recognise the limits of what can sensibly be achieved.
PR-A-029	Astley / Gill / Jelfs / Barnes	28	No comment.
PR-A-030	Oxford Civic Society	1	Oxford Civic Society welcomes this wellwritten consultation document. It is too early to say whether 3,500 or some other number is appropriate. The various sources of evidence upon which Cherwell's contribution should be determined will not be available until the studies commissioned by the Oxfordshire Growth Board have been completed later this year. It is likely that 3,500 will be at the lower end of the possible range.
PR-A-030	Oxford Civic Society	2	Oxford has a serious shortage of housing but is a huge source of employment. The need is for housing located in Cherwell but with good connectivity to Oxford. Employment generating development in Cherwell should be related to Cherwell's own housing plans. However, employment locations close to Oxford such as Begbroke, the Airport and Oxford Parkway are natural locations for additional employment.

PR-A-030	Oxford Civic Society	3	The key issues are addressed, and solutions proposed, in our publication, "Oxford Futures: Achieving smarter growth in Central Oxfordshire". See www.oxfordfutures.org.uk
PR-A-030	Oxford Civic Society	4	Key principles or goals should include delivering infrastructure (above and below ground) before and not after housing development, securing high quality yet affordable design, a good living environment, good public transport links and sustainability.
PR-A-030	Oxford Civic Society	5	Our publication, "Oxford Futures: Achieving smarter growth in Central Oxfordshire" offers a starting point for consideration of the Housing Vision. See www.oxfordfutures.org.uk
PR-A-030	Oxford Civic Society	6	Yes. Accessibility to Oxford should be a key criterion.
PR-A-030	Oxford Civic Society	7	The area of search should be determined by proximity to Oxford, good connectivity, enabling people to make convenient and safe journeys by bicycle, taking account of walking as well as public transport, environmental efficiency, infrastructure capacity and environmental impact. The more distant the locations are from Oxford, the higher will be the proportion of trips made by private car on existing inadequate roads. This will exacerbate congestion and pollution.
PR-A-030	Oxford Civic Society	8	No.
PR-A-030	Oxford Civic Society	9	Yes, following the example of the Green Belt adjustments successfully implemented in Cambridge. The focus should be on augmenting existing corridors which already impact on the Green Belt. Linear development will allow proximate access and help ensure some acoustic tranquillity for the green areas
PR-A-030	Oxford Civic Society	10	Yes, this is essential for accountability purposes.
PR-A-030	Oxford Civic Society	11	By adopting an integrated strategic approach, linked to effective delivery, to meeting both needs.
PR-A-030	Oxford Civic Society	12	More weight should be given to the potential for the growth of Kidlington on grounds of proximity and connectivity. Additional housing in Bicester should be limited by the capacity of the rail and road infrastructure linking it to Oxford. The road infrastructure in particular is already saturated. Affordable housing needs to be planned as part of a balanced mix of housing.
PR-A-030	Oxford Civic Society	13	By promoting design codes, Cherwell DC should emphasise the importance of making areas designated for growth attractive in terms of an urban design requirement, urban planning and infrastructure. An independent design review panel should be created, similar to Oxford's but with the specific addition of Urban Design and Streets Design. As proposed by the Government's current consultation on the NPPF, higher density housing should be provided in the vicinity of transport hubs.
PR-A-030	Oxford Civic Society	14	The objectives should deliver an appropriate housing mix, taking Oxford and the relevant areas of Cherwell together. This does not mean just replicating the housing mix within Oxford.
PR-A-030	Oxford Civic Society	15	See the comments in answer to previous questions about the selection criteria for locations. However, some sources of evidence for determining the locations of Cherwell's contribution will not be available until the studies commissioned by the Oxfordshire Growth Board have been completed later this year.
PR-A-030	Oxford Civic Society	16	Public transport connectivity with Oxford and proximity to Oxford will be the most important considerations. Space needs to be reserved for high quality rapid transit and given the relative proximity of such development the provision of safe, coherent segregated cycling provision should be designed in from the outset.

PR-A-030	Oxford Civic Society	17	It follows from the reply to Q16 that Kidlington should play a greater part than appears to be envisaged. Additional housing in Bicester should be limited by the capacity of the rail and road infrastructure linking it to Oxford. The road infrastructure in particular is already saturated.
PR-A-030	Oxford Civic Society	18	The whole range of social and educational infrastructure needed to support housing development should be included in the planning. Isolated housing estates built without such facilities will lead to social problems as well as adding to carborne travel.
PR-A-030	Oxford Civic Society	19	Taking account of the other factors discussed above and below, it would appear that Kidlington offers the best solution. Additional housing in Bicester should be limited by the capacity of the rail and road infrastructure linking it to Oxford. The road infrastructure in particular is already saturated.
PR-A-030	Oxford Civic Society	20+21	Economic considerations include viability, land ownership, and capturing value uplift to help fund infrastructure.
PR-A-030	Oxford Civic Society	22+23	Cities in Holland and Germany have demonstrated how to secure sustainability by considering in a unified way issues including heritage, biodiversity, environment impacts, sustainable travel provision, zero carbon and of course economic and financial viability. See our publication, "Oxford Futures: Achieving smarter growth in Central Oxfordshire", at www.oxfordfutures.o
PR-A-030	Oxford Civic Society	24+25	Care should be taken to ensure the minimum of disturbance to sensitive sites, including Special Areas of Conservation, Conservation Target Areas, Sites of Special Scientific Interest, BBOWT nature reserves and other places of nature conservation.
PR-A-030	Oxford Civic Society	26+27	We agree that protecting and improving the built and historic environments will be essential. These are identified by the Statutory List of Buildings of Special Architectural or Historic Interest and designated Conservation Areas.
PR-A-031	Oxford Preservation Trust	N/A	OPT is committed to ensuring a positive future for Oxford, preserving and enhancing the City's historic character and green setting, whilst recognising the needs of the 21st century city. OPT commented previously to highlight the need for a County-wide Green Belt study prior to any development being proposed by an Oxfordshire Local Authority in the Green Belt. The Oxfordshire Growth Board is in the process for preparing just this, an Oxford Green Belt study to be used jointly by Oxfordshire authorities who are considering a Green Belt Review. It will be an impartial resource to ensure that if it is established beyond all doubt that Green belt land is needed for development, only the poorest quality land is lost. (cont...)
PR-A-031	Oxford Preservation Trust		9 (cont...) It is therefore essential that no land is considered for release from the Green Belt until the study is available. The Council, in its consultation document is asking whether to help meet the Unmet Housing Need of Oxford, Green Belt land should be considered for a housing allocation (question 8). The Trust would urge the Council not to approach the idea of altering the Green Belt boundary until the full study is completed later in the year. It would be the Trust's view and indeed the Government's view that the Green Belt should be protected as much as is possible.

PR-A-032	L Crone		<p>9 Should the use of Green Belt land be considered? Absolutely not! The Kidlington Green Belt is a major part of the area and widely used by locals. The idea of Green Belt is to permanently protect these precious areas and National Policy says that housing need is not a reason to build on Green Belt land. If these areas are reduced any more, further problems will occur as dogs and wildlife are condensed into an even smaller area. Local people will lose the natural areas and our children will eventually not ever just "go for a walk in the fields" which will add to the unhealthy obesity problem, thus putting more pressure on the NHS.</p> <p>The Kidlington public transport is already at capacity and adding more will just bring more chaos to our roads. It's not uncommon for a journey from Kidlington to The City to take 45 minutes plus already.</p> <p>Surely building the amount of houses "needed!" will just add to the flooding that is already prevalent locally.</p>
PR-A-033	P & N Forsythe	1	<p>No. It is derived from the Oxfordshire SHMA which has simply been accepted by the Council and not subjected to serious independent scrutiny. The SHMA was drawn up by private consultants who largely work for the development industry and therefore have a conflict of interest. Its figures are much too high, far in excess of previous trends and clearly unrealistic. I do not accept that the SHMA figures represent either Cherwell's or Oxford's needs.</p>
PR-A-033	P & N Forsythe	2	<p>No. The excessive housing figures are already based on unrealistic forecasts of growth in employment. To provide for yet more employment generating development is simply creating a vicious circle.</p>
PR-A-033	P & N Forsythe	9	<p>No. Green Belt is a permanent designation. The Green Belt around Kidlington is much valued. National Policy says that housing need is not a reason to build on the Green Belt. The Government, in its manifesto, made a commitment to protect the Green Belt.</p>
PR-A-033	P & N Forsythe	16	<p>Transport networks in this area are already overloaded. I do not believe that current proposals will solve existing problems, let alone those caused by additional growth in Cherwell and elsewhere in the County. The Highway Authority's vision and objectives, that you quote, are vague aspirations and without substance.</p>
PR-A-033	P & N Forsythe	24	<p>Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will further damage the natural environment of Cherwell.</p>
PR-A-034	Deddington Development Watch	1	<p>No, this is premature. The Oxfordshire Growth Board, on which all Oxfordshire Councils are represented, is currently considering the urban capacity of Oxford City and the allocation of forecast unmet demand to individual local authorities. Its report is not due until summer 2016.</p> <p>The housing need figures produced by the Oxfordshire Local Economic Partnership are not based on a robust evidence base like the rest of the Cherwell Local Plan. The unmet housing need figures are based on the economic growth forecasts and aspirations of OxLEP rather than on objectively assessed housing need.</p>
PR-A-034	Deddington Development Watch	2	<p>No. It would be at cross-purposes with the objective of providing housing for people working in Oxford, and would risk prejudicing Cherwell's own Local Plan strategy, to seek to promote further employment generating development in the district.</p> <p>An exception might be to relocate some of the higher-technology business planned for Oxford to Bicester, which is part of the Oxford-Cambridge corridor, where employment opportunities otherwise may not match housing growth.</p>
PR-A-034	Deddington Development Watch	4	<p>The vision for Cherwell already identified is to concentrate development in Banbury, Bicester, Upper Heyford and Kidlington whilst restricting development in rural areas to the larger sustainable villages, thereby protecting the rural nature of the District and the open countryside. These principles should not be compromised whilst taking decisions about meeting Oxford's unmet housing needs.</p>

PR-A-034	Deddington Development Watch	6	<p>Yes. This will allow additional homes to be built closer to places of employment and community facilities in Oxford, and reduce traffic congestion, consistent with sustainable development.</p> <p>This may involve development in the current Green Belt. Parts of the Oxford Green Belt have lost their green nature over time (e.g. south of Kidlington around Water Eaton and south of Oxford in the Grenoble Road area). Development in these areas would be better environmentally than in more rural parts of Oxfordshire as well as much more sustainable.</p>
PR-A-034	Deddington Development Watch	7	<p>Specific criteria such as those outlined in paragraph 4.8, especially:</p> <ul style="list-style-type: none"> - distance/proximity to Oxford City; - key transport corridors; - economic links to Oxford City.
PR-A-034	Deddington Development Watch	8	<p>No. This would conflict with the national policy of reducing the need to travel and the Local Plan policy of restricting development in the rural areas.</p>
PR-A-034	Deddington Development Watch	9	<p>This is already being considered as part of the Review by the Oxfordshire Growth Board. The Review should also consider whether Green Belt land swaps would be an appropriate approach.</p> <p>Parts of the Oxford Green Belt have lost their green nature over time (e.g. south of Kidlington around Water Eaton and south of Oxford in the Grenoble Road area). Development in these areas would be better environmentally than in more rural parts of Oxfordshire as well as much more sustainable.</p>
PR-A-034	Deddington Development Watch	10	<p>To avoid prejudicing Cherwell's own five year supply, this may well be necessary.</p>
PR-A-034	Deddington Development Watch	11	<p>By being 'ring-fenced'. It is essential Cherwell's own strategy is insulated from the separate needs of Oxford and that Cherwell remains in control of its own destiny, especially its five year land supply.</p>
PR-A-034	Deddington Development Watch	12	<p>Oxford City's housing requirements (e.g. mix, tenures) are very different from the needs of Cherwell residents. It will be a challenge to replicate this range of housing in the less urban or rural environment in north Oxfordshire.</p>
PR-A-034	Deddington Development Watch	15	<p>Those closest to Oxford with high quality public transport links, where adequate infrastructure (e.g. foul drainage, water supply, mains gas, schools, community infrastructure) is available or can be provided.</p>
PR-A-034	Deddington Development Watch	16	<p>Railway travel is the most sustainable mode of public transport, whether for individuals or large numbers of people travelling short or long distances.</p>
PR-A-034	Deddington Development Watch	17	<p>The development of current or potential 'commuter hubs' (see Local Plan Part 2 Issues Paper, paragraph 4.134) with rail facilities should be encouraged where these can be expanded without negative sustainability effects.</p>
PR-A-034	Deddington Development Watch	19	<p>Adequate infrastructure (e.g. foul drainage, water supply, mains gas, schools, community infrastructure) must be available or must be provided before any development work on a site can be commenced.</p>
PR-A-034	Deddington Development Watch	20	<p>Oxford City's housing needs are based on aspirational projections of Oxford's employment growth without a robust evidence base or any public consultation.</p>
PR-A-034	Deddington Development Watch	21	<p>There is no firm evidence that this additional housing will need to be built, or, if it is, whether there would be ready purchasers or whether the new residents would actually work in Oxford.</p>

PR-A-034	Deddington Development Watch	22	This additional requirement, on top of the ambitious Cherwell Local Plan Part 1 targets, will put unprecedented strain on infrastructure, the transport system and the environment in north Oxfordshire with negative sustainability effects.
PR-A-034	Deddington Development Watch	23	There is scope for mitigation if additional development is located close to Oxford.
PR-A-034	Deddington Development Watch	24	Additional population and 'dormitory' development traffic between north Oxfordshire and Oxford will place additional pressures on the environment.
PR-A-034	Deddington Development Watch	25	There is scope for mitigation if additional development is located close to Oxford.
PR-A-034	Deddington Development Watch	26	Additional development poses further threats to the integrity of the built and historic environment and heritage assets.
PR-A-034	Deddington Development Watch	27	There is scope for mitigation if additional development is located close to Oxford.
PR-A-035	Deddington Neighbourhood Plan Steering Group	1	No, the Oxford Growth Board on which all Oxfordshire Councils are represented is currently considering inter alia the urban capacity of Oxford and the allocation of the unmet demand to individual local authorities. Their report is not due until the summer of 2016. It is therefore premature to accept the figure of 15,000 homes as the unmet demand for Oxford. The figure has not been justified to date and appears to be aspirational.
PR-A-035	Deddington Neighbourhood Plan Steering Group	2	No, it would be inappropriate to create yet more jobs in Cherwell to employ people already required for jobs anticipated to be created in Oxford. This would seem to defeat the purpose of housing people working in Oxford unless some of the "knowledge" business planned for Oxford were relocated to Bicester, where there may be a superfluity of homes compared with the employment opportunities.
PR-A-035	Deddington Neighbourhood Plan Steering Group	6	Additional housing for Oxford's anticipated employment growth should be as close to Oxford as possible, if necessary within the Green Belt, although Green Belt land swaps should be considered. This will promote sustainable transport by minimising traffic congestion and the pollution attendant on extra car journeys. Extra commuter housing scattered round the county would conflict with this aim.
PR-A-035	Deddington Neighbourhood Plan Steering Group	7	Specific criteria such as some of those outlined in paragraph 4.8: E.g. distance/proximity to Oxford City Key transport corridors Economic links to Oxford City
PR-A-035	Deddington Neighbourhood Plan Steering Group	8	No. This would conflict with the Local Plan policy of concentrating development in urban areas and national policy of reducing the need to travel.
PR-A-035	Deddington Neighbourhood Plan Steering Group	9	This is already being considered as part of the Review by the Growth Board. Each part of the Green Belt is being assessed against the original purposes of the Green Belt. Green Belt land swaps should also be considered.
PR-A-035	Deddington Neighbourhood Plan Steering Group	10	This may well be necessary to avoid prejudicing Cherwell's own five year supply.

PR-A-035	Deddington Neighbourhood Plan Steering Group	11	By being 'ring-fenced'. It is essential Cherwell's own strategy is insulated from the separate needs of Oxford.
PR-A-035	Deddington Neighbourhood Plan Steering Group	12	The housing requirements for Oxford City residents (e.g. mix, tenures) are very different from Cherwell's. It will be difficult to replicate this range of housing in the less urban or more rural environment north of Oxford City in Cherwell.
PR-A-035	Deddington Neighbourhood Plan Steering Group	15	Those closest to Oxford and having the best public transport links, on the basis that adequate infrastructure (e.g. foul drainage, water supply, mains gas, schools, community infrastructure) is available or can be provided.
PR-A-036	R Furneaux	6	Agree. Presumably, the housing that Oxford cannot provide would be wanted mainly by people who have to be in Oxford daily for work, education etc. Otherwise, they wouldn't need to live in Oxford.
PR-A-036	R Furneaux	7	The Plan Area should be one from which easy access into Oxford is possible, preferably by public transport rather than by private car.
PR-A-036	R Furneaux	8	No. Parts of the District are remote from Oxford, have poor transport links to it and have no great economic connection.
PR-A-037	Bloxham Parish Council	1	No 3,500 does not seem to be a reasonable working assumption for Cherwell as this appears to limit Oxford to 1000 additional new homes. Oxford City must take a fairer % of unmet need. A figure of 3500 might allow it to be less committed to finding more opportunity for growth in Oxford.
PR-A-037	Bloxham Parish Council	2	Yes. All the economic attractors named are close to Oxford or Bicester. What about Banbury?
PR-A-037	Bloxham Parish Council	3	Key issues to be considered should be the location of the additional houses. These should be locations: - with direct sustainable public transport links to Oxford - that avoid further congestion on rural roads - that have sufficient capacity within existing infrastructure provisions
PR-A-037	Bloxham Parish Council	4	To preserve the relationships between villages in terms of size and access to services. If the Category A villages grow disproportionately then the character of the rural area of the north of the county will be lost. To ensure real sustainability is supported.
PR-A-037	Bloxham Parish Council	5	To achieve additional growth without adversely impacting Cherwell's own growth strategy. The impact of this strategy on Category A villages will be challenging enough.
PR-A-037	Bloxham Parish Council	6	Yes the plan area should be well related to Oxford City.
PR-A-037	Bloxham Parish Council	7	Access to Oxford. Equitable distribution of growth across rural areas. Infrastructure improvement plans.
PR-A-037	Bloxham Parish Council	9	Yes.
PR-A-037	Bloxham Parish Council	10	Yes.
PR-A-037	Bloxham Parish Council	12	Key issues for rural villages are identified at paragraph 5.37. Robust measures should be required to test any potential development location against these issues.
PR-A-037	Bloxham Parish Council	15	Locations where reliance on car use will not be essential. Bus services in rural areas even those close to Banbury are not secure. Assess potential for new settlements where access by public transport to Oxford could be designed in.

PR-A-037	Bloxham Parish Council	16	Lack of public transport options direct from Bloxham to Oxford. Cuts to bus services to Banbury to use train. No plans- and little opportunity - improve traffic flow on A361.
PR-A-037	Bloxham Parish Council	17	Must be clarity on affect development location would have on access to services for existing residents.
PR-A-037	Bloxham Parish Council	18	<p>Capacity of primary schools in rural areas. New schools in Banbury will not address issue of lack of places in village schools. No development location should be pursued that would result in primary age children having to attend a school in another village.</p> <p>Water and electricity supply are under strain and no plans to increase capacity. Systems struggling to cope with current demand.</p> <p>Flooding and drainage a real issue as fields are developed reducing capability to absorb water. See A361 March 9 where new site at Salt Way has been cleared.</p> <p>No plans and no realistic possibility of improving road access to Oxford from north of the county. Access to Banbury is increasingly difficult and it is not at all clear that road improvements connected with the Salt Way developments will ease congestion on A361. Public transport to Banbury from the villages is to be cut and so no expectation of extended services to suit commuters wanting to get to Banbury station.</p>
PR-A-037	Bloxham Parish Council	19	Infrastructure issues suggest potential development locations should be in the south of the county and closer to Oxford and the knowledge spine.
PR-A-037	Bloxham Parish Council	22	All evidence gathered for BNDP shows that Bloxham residents rely heavily on car use. There is universal acknowledgement that the mini roundabout on A361 is operating above capacity. BPC have asked for an air quality survey as numbers of HGVs using A361 increase. The road is regularly at a standstill at peak times as traffic negotiates cars parked at the local shops. Diminishing numbers of children walk to school and very few cycle.
PR-A-037	Bloxham Parish Council	25	Development to meet Oxfords unmet need should not be at the expense of Cherwell's natural environment while allowing Oxford to protect areas of its green belt that may be of lesser environmental importance.
PR-A-037	Bloxham Parish Council	26	Development already planned or completed on the edges of villages around Banbury including Bloxham has already adversely impacted the distinctiveness of these villages. The weight of new development has diminished the impact of the historic core of villages like Bloxham and has affected the rural nature of all approaches to the village. Important views of Bloxham's impressive church have been affected.
PR-A-037	Bloxham Parish Council	6&8	<p>1 Allocations for growth confined to narrower geographical focus. Closer to Oxford.</p> <p>2 Access to Oxford from rural areas north of the county is difficult. Reference access to trains bus cuts and no road infrastructure improvements suggested to A362/A 4260</p> <p>3 Area of search for development sites must be confined to areas where access to Oxford is sustainable.</p>

PR-A-038	Middleton Stoney Parish Council	1	<p>No. The concept of Cherwell District (CD) providing the level of housing to meet OC need is fundamentally flawed. In obtaining approval for its own now adopted Local Plan CD has already needed to revise upwards its own housing provision to meet the requirements of the SHMA (2014) as directed by the Planning Inspectorate. To expect CD to accommodate additional housing specifically for Oxford City (OC) must be seen in the context of the very significant increase in housing already necessary to meet its own needs.</p> <p>It seems to us that the response to OC's anticipated need (28,000 to 2031) (contained within Table 2) is pitiful but, further, to date there is no evidence upon which the true extent of unmet need arising from OC can be based.</p> <p>Oxfordshire Growth Board (OGB) and Oxfordshire Councils must, within their work as outlined in Paragraphs 1.17 & 1.18, ensure that as much of the anticipated housing need for Oxford City (OC) is contained within OC boundaries utilising all brownfield areas as necessary and by the pragmatic use of greenbelt land, before allowing the spread of OC's requirements to other areas.</p> <p>Only when the work of the (OGB) has been completed can the true unmet need be established. (cont....)</p>
PR-A-038	Middleton Stoney Parish Council	1	<p>(cont....) Thus the 3500 working assumption is as yet not based on any detailed assessment and is also merely a split between 5 neighbouring authorities together with an unexplained arbitrary uplift for CD.</p> <p>Within paragraph 2.8 we note that "Oxford has a responsibility to meet its housing need as fully as it can so that neighbouring districts can be sure they are not planning to meet Oxford's housing need unnecessarily". We read from this that the general principle should be that any perceived need is met where it arises.</p> <p>The developments taking place in Cherwell District (CD) will already increase commuter traffic. The addition of a further 3500 properties specifically to meet the needs of growth in OC will add to the commuting burden and given that there are no discernible plans to improve transport infrastructure this will exacerbate an already pressured situation.</p>
PR-A-038	Middleton Stoney Parish Council	2	<p>Again this seems to be a flawed concept. The additional housing is required to support employment within OC even though there is no clear evidence that it is required. Even assuming that it is required and based upon clear evidence, is it proposed that opportunities identified within OC are simply transferred to CD? What will OC's response to this be? As indicated in our response to Q1, if employment is identified specifically for OC growth then the housing to support it should also be within OC.</p>
PR-A-038	Middleton Stoney Parish Council	3	<p>Oxford is an economically successful area and also its close proximity to London feeds greater need for housing. Type of housing must reflect the requirements of a successful economy. However, many service sector employees (e.g. healthcare education) simply cannot afford to live in close proximity to the city and commuting is both expensive and due to transport infrastructure failings, inconvenient. It is an urgent requirement that the appraisal of city boundaries is undertaken with a view to ensuring that the level and type of housing is consistent with the economic requirements of the growing city.</p>
PR-A-038	Middleton Stoney Parish Council	4	<p>Again the key principle must be to meet need as close as possible to where it arises. This means that the OC requirements should not impact on CD objectives and aims. The housing need identified for the district should compliment the CD vision. An enforced "add on" of housing for commuters to OC does not achieve this.</p>
PR-A-038	Middleton Stoney Parish Council	5	<p>As articulated in Q4 above the OC requirements should not detract from the CD vision.</p>
PR-A-038	Middleton Stoney Parish Council	6	<p>If, ultimately, a clear, evidence based, need is established for OC then the 'area of search' should relate to OC and not extended.</p>
PR-A-038	Middleton Stoney Parish Council	7	<p>Should be concentrated on unused of brownfield land (including golf courses) within OC and in conjunction with a reappraisal of greenbelt areas.</p>

PR-A-038	Middleton Stoney Parish Council	8	No.
PR-A-038	Middleton Stoney Parish Council	9	Yes. The greenbelt area should be carefully redefined. After all it is 40 years since the Oxford Green Belt was formally approved in 1975. The Grenoble Road development should be reconsidered.
PR-A-038	Middleton Stoney Parish Council	10	OC's five year housing supply should be contained within OC. It cannot be allowed to influence the five year need for CD. The clear priority for CD is to ensure that it meets its own identified housing needs.
PR-A-038	Middleton Stoney Parish Council	11	This is a technical issue but if an "area of search" within the OC is identified then it should meet the OC need only.
PR-A-038	Middleton Stoney Parish Council	12	There should be no deviation from the CD local plan. Speculative developments on the premise of meeting OC unmet need should not be permitted.
PR-A-038	Middleton Stoney Parish Council	13	No.
PR-A-038	Middleton Stoney Parish Council	14	No further comment.
PR-A-038	Middleton Stoney Parish Council	15	Not clear. Sites should be located closest to employment.
PR-A-038	Middleton Stoney Parish Council	16	Oxfordshire's transport infrastructure is already under strain due to commuting traffic. A further 3500 houses built at a distance from OC will only exacerbate already serious problems.
PR-A-038	Middleton Stoney Parish Council	17	Unless there is a reappraisal of the location of employment developments required by OC then it will cease to be an attractive place to do business.
PR-A-038	Middleton Stoney Parish Council	18	Growth increases the need for service sector support particularly health/education facilities. These services already struggle to find adequate numbers of employees. Many potential employees find it too expensive to live in OC or travel to it.
PR-A-038	Middleton Stoney Parish Council	19	Employment development locations should be sited to ensure that there is affordable access to them for those who work within them.
PR-A-038	Middleton Stoney Parish Council	20	If OC is restricted in its ability to expand its boundaries to accommodate both economic development and the housing which should support it, then eventually it will cease to be an attractive investment opportunity and economic growth will be constrained.
PR-A-038	Middleton Stoney Parish Council	21	Clearly, the city needs to expand its boundaries.
PR-A-038	Middleton Stoney Parish Council	22	Commuting to OC to service OC growth is not sustainable.
PR-A-038	Middleton Stoney Parish Council	23	Clearly, the city needs to expand its boundaries.
PR-A-038	Middleton Stoney Parish Council	24	The natural environment is important since it enhances quality of life. Development should be restricted to areas of low value environmental importance and the greenbelt appraisal must identify such areas. If there is an ultimate aim to see considerable economic growth for OC then it is not realistic to continue with the premise that all greenbelt land is sacrosanct. Further, simply to protect OC green spaces at the expense of other spaces within CD is not an answer.

PR-A-038	Middleton Stoney Parish Council	25	Realistic reappraisal of greenbelt.
PR-A-038	Middleton Stoney Parish Council	26	No, except to say that the internationally renowned sites within OC must be protected.
PR-A-038	Middleton Stoney Parish Council	27	No comment.
PR-A-038	Middleton Stoney Parish Council	28	Under no circumstances.
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	1	<p>No. To date there is no evidence upon which the true extent of unmet need arising from Oxford City can be justified. For reasons set out above the MCNPF Forum reject the basis for the estimate of need, principally the Oxfordshire Strategic Housing Market Assessment. Until such time that the actual scale of unmet need has been identified, based on an up-to-date, transparent and clearly evidence-based assessment, which has been subject to scrutiny through the Examination process, no working figure should be applied.</p> <p>The 3,500 working assumption is not based on any detailed assessment other than a simple pro-rata split between the five neighbouring authorities plus an arbitrary uplift which has no sound planning justification. It pre-dates the final assessment of the Oxfordshire Growth Board and signals to that process a scale of growth that the District Council might be willing to accept. This has been done without any consultation with local communities or proper and transparent assessment as to whether this figure is suitable in terms of actual unmet need; we also consider that Cherwell District Council should, prior to this consultation, have assessed the ability of the district to accommodate such a scale of additional growth in a sustainable manner that is consistent with the established spatial strategy set out in the recently adopted LP1.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	2	<p>This question is framed within the context of there being a justified and transparent evidence-based assessment of unmet need arising from Oxford and Cherwell District's ability to accommodate it in a sustainable manner. For reasons set out in response to Question 1 the MCNPF consider that there is no robust evidence base available at this time that justifies additional housing for Oxford City within the Cherwell District.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	3	<p>Once again the question is framed as if it is fait accompli that Cherwell will accept a 'significant' contribution in response to Oxford City's unmet need. This is in advance of the final report of the Oxfordshire Growth Board and fails to base the district's capacity to provide for growth based on a detailed assessment of what is best for Cherwell's settlements and their ability to accommodate additional development, within the context of the established requirements set out in the LP1. Requirements which in themselves require a significant uplift in housing when compared to that previously delivered.</p> <p>The key issue for Oxford City is to ensure that identified need is based on an up-to-date and evidence-based assessment and fundamentally, that a detailed and transparent assessment of capacity within Oxford City's administrative boundary is undertaken. The neighbouring authorities to Oxford City, including Cherwell, cannot and should not be the first response of Oxford City. Need arising from Oxford City should be met as far as possible within Oxford City, and this should include urban regeneration/intensification and the release of appropriate sites located within the Green Belt.</p> <p>Only when there is a full and transparent assessment of Oxford City's capacity to accommodate growth to meet its unmet needs should neighbouring authorities be expected to consider their ability to provide for additional development. Cherwell, along with West Oxfordshire, South Oxfordshire and the Vale of White Horse should not be a dumping ground for Oxford City's unmet need.</p>

PR-A-039	Mid Cherwell Neighbourhood Plan Forum	6	<p>As set out previously the MCNPF does not support the basis of this consultation, nor is it convinced at this time as to the extent of unmet need arising from Oxford City and the need for Cherwell District Council to make provision to accommodate a significant level of development in response.</p> <p>Our response to Question 6 assumes that an appropriate level of unmet needs has been identified in an open and transparent manner based on sound evidence. It is therefore a hypothetical scenario and should not be taken as an endorsement of the scale of unmet need arising from Oxford.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	7	<p>On the assumption that there is a robust and transparent evidence base to justify a scale of unmet need, which the MCNPF consider is currently lacking, the 'area of search' should be set so that need is addressed as close to Oxford City as possible. This may include areas currently located within the Green Belt. The Green Belt has remained largely unchanged since it was first designated back in the 1970s and in response to the development pressures that exist today, a comprehensive review is considered necessary in order to determine the extent to which such land continues to contribute to the purposes of Green Belt. It is only through such a detailed assessment that the capacity of land within the current Green Belt, to make a contribution to meet Oxford's unmet need can be understood.</p> <p>An area of search should also take into account the existing functional relationship of existing locations with Oxford City and the delivery of necessary infrastructure improvements to support additional development. There must be a recognition that any additional development accommodated in Cherwell will exacerbate commuting flows, not just to Oxford but also to London.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	8	<p>No. The MCNPF strongly objects to the district-wide approach. The Cherwell Local Plan Part 1 has established the housing need for the district to 2031 which, as set out previously, requires a significant and challenging uplift in housing delivery when compared with historic rates of delivery. To apply the district-wide approach effectively increases the Local Plan Part 1 requirement still further, to levels which cannot be supported. The consequence of which will be to put all settlements, at every tier in the settlement hierarchy at risk from speculative development, premised on the need to respond to Oxford City's unmet need. A district-wide approach runs counter to the principle of meeting need where it arises.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	9	<p>Yes. To proceed without a detailed and transparent assessment of the Oxford Green Belt would not be appropriate, particularly given the fact that the existing Green Belt boundary has remained unchanged since the 1970s. Where unmet need has been identified it is necessary to ensure that in the first instance, all options are considered within Oxford City's administrative boundary, this must include changes to policies on density, regeneration, and other policies that serve to restrict development. It should not be an automatic default position that neighbouring authorities, including Cherwell, will have to accommodate growth arising from Oxford City. The MCNPF is not advocating development at any cost within Oxford City, or promoting a dilution of the important function of the Green Belt, rather a detailed and meaningful review, resulting in pragmatic policy solutions so that the unmet need is minimised as far as possible.</p> <p>Furthermore, where specific locations within the existing Green Belt have been assessed and considered to no longer contribute to the purposes of the Green Belt designation, and therefore provide potential development locations, there should be a concerted effort to ensure that additional compensatory areas of land are re-classified as Green Belt. This will help to preserve the integrity of the Green Belt and maintain its vital function in terms of restricting urban sprawl.</p>

PR-A-039	Mid Cherwell Neighbourhood Plan Forum	10	<p>Yes. The first priority for Cherwell District Council must be to ensure that it meets in full its own identified housing needs. It should not be the case that unmet need arising from Oxford City makes the housing land supply requirements for the district more onerous such that the ability to demonstrate a five year housing land supply cannot be demonstrated.</p> <p>The implications of not having a five year land supply are serious and put all of the settlements across the district at risk from speculative developers. To some extent this is recognised as an appropriate incentive for Local Plans to ensure that an adequate supply of housing is maintained and we strongly urge the District Council to continue to facilitate appropriate development so that this can be achieved.</p> <p>There should be a clear separation between Cherwell’s housing requirements and those additional homes needed in response to Oxford’s unmet need. The failure to distinguish between the two elements of housing need will result in a free-for-all across the district, including those villages within the MCNPF area. This must be avoided through a clear separation of housing requirements.</p> <p>Cherwell’s five year housing land supply obligations must continue to be calculated on the housing requirements for the district as set out in the adopted Local Plan.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	11	<p>The MCNPF is not in a position to provide a detailed response to this question. As a matter of principle there must be a clear separation of the housing requirements established in the Local Plan Part 1 and any identified housing requirement to help meet the needs of Oxford City. Although we do not support the principle of accepting unmet need arising from Oxford City, the area of search approach may provide a geographically separate area within which requirements relating to Oxford’s unmet need can be applied and an appropriate and separate land supply calculation established.</p> <p>The critical concern of the MCNPF is to ensure that unmet need arising from Oxford City does not undermine Cherwell’s ability to demonstrate a sufficient supply of sites to meet its five year obligations.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	12	<p>The MCNPF supports the position set out at para 5.37 which states that the Partial Review will need to accommodate additional housing growth in a way that complements the Local Plan Part 1. We repeat our principle objection to the scale of unmet need which has yet to be scrutinised or justified through appropriate evidence, but welcome the emphasis to the established objectives set out in the adopted Local Plan.</p> <p>Reference to “all reasonable locations” at para 5.36 is vague and the MCNPF are of the view that where need is robustly identified, the response must be to address that need, as close to where that need is arising.</p> <p>Reference to Category A settlements at para 5.35 should not be read as a list of villages that, because of their classification as a Category A village, have capacity to accommodate unmet need from Oxford City. There should be recognition within the Issue document that Category A villages have made an important contribution to development and that any significant development in excess of the 750 requirement set out in LP1 Policy Villages 2, risks undermining the wider strategy of re-balancing the district by focusing development at the main urban areas.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	13	<p>The Issues consultation document makes no reference to Neighbourhood Plans and the potential for the Oxford overspill to render existing plans out-of-date and/or to undermine the ability of local communities to advance a Neighbourhood Plan for the betterment of their communities.</p>
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	14	<p>The MCNPF does not consider that it is possible to provide a detailed response to this question. The key issue for Cherwell must be to ensure that the true extent of unmet need arising from Oxford is firmly established and transparent. Cherwell District should not be a dumping ground for Oxford City’s unmet need, particularly if the City itself has not considered all reasonable options to accommodate as far as possible its own needs within its administrative area.</p>

PR-A-039	Mid Cherwell Neighbourhood Plan Forum	15	The Issues consultation document does not define what constitutes “strategic housing sites”. As a matter of principle need should be accommodated as close to where it is arising as is possible and other key considerations must take account of existing infrastructure and capacity for improvements. Critically, the established development strategy and settlement hierarchy set out in the Local Plan Part 1 should not be undermined. The Duty to Cooperate is not a Duty to agree and if the cost of accommodating unmet from Oxford is the dilution of the strategies, objectives and policies within the adopted Local Plan then it would be wholly inappropriate for Cherwell District Council to advance this process any further.
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	16	MCNPF has registered very significant concern from local communities regarding traffic volumes in these rural areas. There are already several serious congestion hot-spots, and it is inevitable that additional housing will exacerbate these and create others.
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	17	Mitigation and improvements necessary to support additional growth must be considered in the context of the communities/settlements in the locality and the potential impact that this can have in terms of making existing routes more attractive to road users and undermining the intrinsic character of our rural communities as result additional development. Although improvements may be physically possible in some cases this should not be at the expense of our established rural communities.
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	18	MCNPF is already concerned regarding the capacity of existing infrastructure, both in terms of physical infrastructure such as: drainage; electricity supply; and, mobile phone coverage which are already the source of regular complaints from our communities, but also social infrastructure including health care provision, local/community policing and cemetery provision. Any new housing will clearly have an impact on existing provision and development should only be approved where it can be demonstrated that, as a minimum, it will not exacerbate existing infrastructure provision, and in order for development to be sustainable, demonstrate real improvements to the existing infrastructure situation to the betterment of existing and new residents.
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	19	It is clear that existing infrastructure problems, in terms of quality and capacity, will be made significantly worse where it is the case that significant new homes need to be accommodated within the District. The ability of existing infrastructure to cope with additional homes should be a key consideration in determining potential locations for new homes in response to Oxford’s unmet need.
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	20-27	No response is deemed necessary in the light of comments above.
PR-A-039	Mid Cherwell Neighbourhood Plan Forum	4+5	Our response to Questions 4 and 5 should be read in conjunction with our overriding concerns expressed previously. Questions 4 and 5 are superfluous and is reliant upon an acceptance of the district accommodating a significant scale of growth to address Oxford’s unmet need.

PR-A-039 Mid Cherwell
Neighbourhood
Plan Forum

1 The starting point must be that the District has an adopted Local Plan (Part 1 - LP1) (July 2015) which sets out the need for housing and seeks to provide for 22,840 homes over the Plan period from 2011-2031. This equates to 1,140 dwellings per year over the 20 year plan period. This represents a significant increase from that originally proposed in the submitted LP1 which sought to provide housing at a rate equivalent of 670 homes per year, or 16,750 over the plan period to 2031. This significant increase was justified on the basis of the conclusions of the 2014 Oxfordshire Strategic Housing Market Assessment (SHMA).

Therefore in order to ensure soundness total housing provision proposed in the LP1 has already been increased by circa 36% from that originally proposed. The resultant annual average completion rate necessary to meet this uplift in housing amounts to a 124% increase when compared against actual completions recorded annually over the five year period preceding the start of the LP1 Plan period (i.e. 2006-2011 – average annual completions = 509dpa). Total completions over the period 2006-2015 for the district amount to 4,594 dwellings, equating to actual completion rates of 510 dwellings per annum over that 9 year period.

It is therefore clear that in order for the Cherwell District to meet its own identified need for housing it will require a very significant uplift in housing and we question whether this can be achieved given the scale of growth proposed at the district's two main towns of Banbury and Bicester. (cont....)

PR-A-039 Mid Cherwell
Neighbourhood
Plan Forum

1 (cont....) We note that the final unmet need figure arising from Oxford City is yet to be determined, but that a working assumption of 3,500 additional homes for the Cherwell District is being advanced as a working figure. If adopted within the timeframe set out in the Council's Local Development Scheme, i.e. 2018, it will require this need to be met over the remaining years of the Plan period, equating to approximately additional 269 dwellings in the district per year between 2018 and 2031.

To expect Cherwell District to accommodate this additional housing requirement must be seen in the context of the very significant increase in housing already necessary to ensure the district can meet its own housing obligations. The first priority for the District Council must be to ensure that it meets in full housing need for the district identified in the LP1.

It is the view of the MCNPF that Cherwell District Council should subject the figures of need arising from Oxford City to proper and transparent scrutiny. The National Planning Policy Framework (NPPF) states that "Local Plans should be aspirational but realistic". (NPPF, Para 154). The 2014 Oxfordshire SHMA figures are specifically aligned with forecasts of new job growth advanced by the Local Enterprise Partnership and the aspirations of individual promoters of land, whose very existence and motivation is justified on the basis of economic growth and job generation. In effect a self-fulfilling prophecy. The 'committed economic growth' scenario set out in the SHMA which has been applied to determine future housing requirements is an overly aspirational objective that does not appear to be grounded in any evidence. (cont....)

Moreover, to advance a strategy that effectively creates dormitory locations as a base for out-commuting, not just to Oxford but also to London and other sub-regional employment hotspots, will result in unsustainable patterns of development to the detriment of the district, beyond the capacity of our existing infrastructure and at the expense of the intrinsic quality of the district's landscape and rurality.

PR-A-039 Mid Cherwell
Neighbourhood
Plan Forum

1 (cont....) The implications for the Cherwell District, its established spatial strategy and the individual settlements, including those which form part of the MCNPF, will be significant. Accordingly, the MCNPF objects as a matter of principle to the premise for this consultation and the need for Cherwell District to accommodate additional growth arising from Oxford City. We recognise that the District Council has a statutory responsibility, under the Duty to Cooperate, to consider the extent to which unmet need arising from Oxford City may be accommodated within the District. However, this Duty is not a Duty to agree and in this context the working figure of 3,500 homes is regarded as without foundation and supporting evidence.

PR-A-039 Mid Cherwell Neighbourhood Plan Forum	1 Conclusion-The MCNPF is committed to working closely with the District Council as it advances the Neighbourhood Plan. The progress of the Partial Review of the Local Plan 1, although focussed on unmet need arising from Oxford, must not relegate the aspirations and objectives of communities within the district as it seeks to accommodate significant housing in addition to that established in the Local Plan Part 1.
	The comments set out above represent an accurate reflection of the views of the MCNPF and demonstrate genuine concern with both the justification for, and the potential impacts of, accommodating significant additional development arising from Oxford City.
	The primary focus for the District Council must to the spatial strategy and objectives set out in the Local Plan Part 1 and to support those communities that are committed to the Neighbourhood Planning process.
PR-A-040 T Lucas	16 Transport networks in this area are already overloaded and at peak times are barely usable. The main routes into Oxford are congested and without relief. I do not believe that current proposals will solve existing problems, let alone those caused by additional growth in Cherwell and elsewhere in the County, and am dismayed by the lack of vision or principle displayed in the planning.
PR-A-040 T Lucas	24 Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will further damage the natural environment of Cherwell. I am very concerned that the Kidlington's natural surrounds are being eroded by excessive development, and that the knock on effects of this on the flora, fauna, and animal life will be irreversible.
PR-A-041 JPPC / Oxford University Press	2 Account should be taken of the potential need for additional land for employment purposes as well as for housing. In this context, should the Council conclude that the Part 2 Plan should retain the site within the green belt, it should consider the removal of the site from the green belt in the Partial Review in order to meet the employment needs generated by the additional housing growth. In this context, the analysis of the larger parcel contained in the Oxford Green Belt Study should be taken into account: the site makes no significant contribution towards the green belt or any of its purposes.
PR-A-041 JPPC / Oxford University Press	28 Site submission - Land off Langford Lane, Kidlington
PR-A-042 J & H Maddicott	1 The figure of 3,500 homes needed to meet Oxford's housing demands is by no means a reasonable one. It derives from the Oxfordshire SHMA, which has never been properly scrutinised and which was largely drawn up by developers and their associates. The figures provided in the SHMA are based on no hard evidence and are quite unrealistically high.
PR-A-042 J & H Maddicott	2 Cherwell does not need to provide for more employment generating development. Increasing employment opportunities, in an area which currently has very low unemployment, will merely increase the need for housing.
PR-A-042 J & H Maddicott	9 The Oxford Green Belt should be regarded as an area permanently protected from development. The Green Belt around Kidlington is particularly valued, since it prevents Kidlington's merger with the city and the creation of a continuous suburban strip stretching for some seven miles north of Oxford.
PR-A-042 J & H Maddicott	17 Oxford's transport system is already near the point of breakdown, with traffic jams and delays occurring increasingly frequently. Further building can only exacerbate what is already a major problem.

PR-A-043 E & R Moore

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In the context of the necessity for this partial review of Cherwell's Local Plan (Part 1), we would first like to restate our strong objection to the obligation forced upon the Oxfordshire district local authorities to meet Oxford's estimated unmet housing needs. It is vital that CDC should challenge both the SHMA's overinflated estimate of the county's housing requirements, and the accuracy of Oxford's own estimate of its housing need. CDC has the discretion (Issues Paper 2.6) "... for Local Plans to examine whether that need can be fully met in the light of environmental or other considerations". We urge CDC in undertaking this Review to resist a proposed solution to Oxford's housing, pollution and traffic problems that merely shifts them outwards to adjacent localities in the Cherwell District. We would also express our very strong objection to any development on the Oxford Green Belt: the Green Belt has a very special function, in Cherwell as elsewhere, to protect the countryside and open and green spaces and to act as a buffer against the spread of urban development and coalescence between settlements. In Kidlington, where we are resident, the Green Belt surrounding the village is precious and highly cherished by the community for its health, environmental, visual, and recreational value. This is not nimbysm: the majority of Kidlington's residents live in an urban setting, probably a majority of them on estates, and Kidlington, although a sizeable settlement, is deficient in parks and open or green spaces, so that the countryside around the village provides the only locally accessible opportunity for enjoying open green space. (cont...)

PR-A-043 E & R Moore

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(cont...) In this context, and as Kidlington residents, we would make the following detailed comments on the Issues Paper (IP) and Sustainability Appraisal (SO):

The Issues Paper outlines development for Kidlington already set out in the Local Plan Part 1, including employment creation at Begbroke Science Park and Langford Lane (acommodated from a smallscale review of the Green Belt), an increased role for Oxford Airport, and the enhancement of Kidlington village centre. These together with additional traffic generated by proposals in the current Transport Strategy (Park & Ride at Langford Lane, rapid transit bus routes), the Northern Gateway, improvements to the A34/A40 interchanges, the planned Upper Heyford housing development, and the recently opened Oxford Parkway rail station make any consideration of major housing development on the outskirts of Kidlington unsustainable in terms of loss of green and open space, increased road and air traffic and pollution, and additional demand upon an already stressed local infrastructure, most notably health services provision. Largescale development in Kidlington is probably only possible within the Green Belt, most likely in the Kidlington gap, and we would object to this absolutely for reasons already indicated. The effects of largescale housing or employment development in or near to Kidlington can only be detrimental to the health and quality of life of Kidlington residents and to the natural environment, outcomes that are the opposite of Cherwell's 'vision' for '... an area where all residents enjoy a good quality of life [where] those who live and work here will be happier [and] healthier'. (cont....)

PR-A-043 E & R Moore	1 SA	<p>(cont...) With regards to the detail of the Sustainability Appraisal, the critical and key part of the Review process, we have concerns in relation to Kidlington in particular, since it is clearly a likely target area for largescale development about the accuracy and viability of a number of the Assumptions (expressed as positive, negative or neutral ratings) that are proposed as a short cut to measuring the Review's deliberations against Cherwell's sustainability objectives. We believe that these Assumptions are in many instances simplistic and should be modified or abandoned in favour of a more detailed and balanced methodology.</p> <ol style="list-style-type: none"> 1. Provision for affordable housing. Cherwell's existing target is for 33% affordable housing; this will not be achieved while developers have the option of 'financial contribution', which makes a nonsense of this target. 2. Health/wellbeing. Sites within/adjacent to Kidlington are rated (+) because of the adequacy of existing healthcare facilities – but the existing healthcare facilities in the village are already stretched to breaking point. 5. Create/sustain vibrant communities. Airports should be included in the list of adverse factors (). The number of flights from Kidlington airport has increased over time, causing considerable noise, air, and light pollution in and around Kidlington. More recently lengthy episodes of very loud and persistent noise from ?engine testing occur on an almost daily basis, and can be heard inside our doubleglazed house in north Kidlington and as far away as the centre of Kidlington and ShiptononCherwell. The noise is unpleasant and intrusive. Further development of the airport will increase these pollutions, to the detriment of the mental and physical health of residents. (cont...) 	SEE LEFT COLUMN
PR-A-043 E & R Moore	1 SA	<p>(cont...) 6. Improve accessibility to all services/facilities. Development within/near Kidlington is rated (++) because of proximity to a number of services/facilities, but this rating is very crude, and takes no account of the range, quality, and adequacy of the services, such as the capacity of the health and education services, the standard of retail provision, or the number and quality of urban green spaces.</p> <p>7. Conserve, enhance, create resources for biodiversity. The rating of 'may have' (-) or () is conditional upon the detailed planning application, because it is considered that potential impacts cannot be determined with certainty at this level of assessment. The conditionality attached to this critical objective is not satisfactory and should be amended: the momentum of a full planning application favours development over biodiversity interests, and green infrastructure and mitigation are dependent on developers' remediation plans which in actuality may or may not be of environmental value and may or may not be implemented and maintained. There are similar concern about the conditionality attached to the creation of new areas of open space ('likely positive effect', 'larger sites may have particularly positive effects'): this is much too vague and also begs the question of how new areas of open space are to be created in largescale developments which by their very nature actually substantially reduce existing areas of open space.</p> <p>8. Protect/enhance landscape character ... make accessible for the enjoyment of the countryside. Again, the conditionality of this rating ('may have') is unsatisfactory, leaving the burden of assessment to the planning application stage. (cont....)</p>	SEE LEFT COLUMN

PR-A-043 E & R Moore

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(cont...) 10. Reduce air pollution and road congestion. It is essential that these ratings based on distance from sustainable transport links are applied with reference to the actuality of public transport provision and cycling and walking opportunities at the time of the review and not on any planned future (but uncertain) public transport etc. improvements. The current Oxfordshire Transport Strategy itself needs careful scrutiny for its potential to increase congestion and traffic flow through Kidlington by merely moving the current congestion and traffic volume from the perimeter of Oxford to outlying areas. There are wider current or planned developments such as the Northern Gateway, Upper Heyford housing scheme, and proposed alterations to the A34/A40 intersections in the locality that will increase the type and volume of traffic through Kidlington, and these should be factored into any consideration of additional traffic pressures created by largescale housing development in or near Kidlington, especially as Kidlington already has an AQMA. A weakness in setting ratings according to the proximity of public transport provision etc. is that it inherently excludes commercial traffic with its heavy polluting and noise effects and, critically, it relies on voluntary use of public transport, making it misleading to assume that public transport provision will substantially reduce the increase in traffic resulting from largescale development. Finally, a serious omission in this section is consideration of the air pollution from air traffic over Kidlington (see 5. above), and this should be rectified.

12. Reduce flooding risk. We struggle to understand why largescale development in highrisk areas should be considered at all, and why ratings are applied based on the extent of the allocation of open space in a development when it is an inherent characteristic of largescale development that it itself consumes a large area of open space. There are sufficient examples in the county of permitting development on highand moderaterisk flood areas to demonstrate that it can precipitate flooding events that damage quality of life and the economy and necessitate highcost remedial works. Fields and open spaces around Kidlington frequently flood in periods of heavy rainfall, particularly near the river Cherwell to the east and the canal to the west. (cont....)

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PR-A-043 E & R Moore

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(cont...) 16. Ensure levels of high and stable employment so that everyone can benefit from economic growth of the district and Oxford and 17. Economic growth, competitiveness. These are very generalised aspirations that fail to take into account the disbenefits (mainly health and social) of economic growth, such as loss of green and open space and increased traffic and pollution and infrastructure pressures, nor is there any recognition that to some (currently unknown?) extent the types of employment and income levels generated could lead to greater inequalities in areas such as access to affordable housing and educational and health provision – not everyone would benefit. The outcome of largescale residential development adjacent to Cherwell's existing and planned key employment areas is problematic to forecast, and the positive ratings (++) and (+) need reconsideration since they do not reflect the complexity of possible outcomes. It is difficult to predict where people will choose or can afford to live in relation to their workplace. Housing developments adjacent to Kidlington intended to provide for Oxford's workforce risk instead being occupied by London commuters attracted by the new Oxord Parkway rail link or by commuters utilising the access to nearby trunk roads, and expansion of employment sites in the same locality can only increase pressure on housing, transport and infrastructure.

Similarly, the notion that the development of largescale employment sites always merits a positive (++) rating as a contribution to economic growth is simplistic since it does not take into account such factors as the type of employment and revenue generation and, critically, the economic benefits to the locality in which it is situated or the disbenefits to communities of loss of open space and increase in traffic and pollution. The Cherwell district already enjoys a below national average unemployment rate, and continued expansion of the labour force will exert unsustainable pressures on housing supply and on public services that are already and for the foreseeable future under massive strain from funding cuts. (cont...)

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PR-A-043	E & R Moore	1	9 (cont...) We would additionally ask that the Review process also gives due weight to the government's stated desire to conserve the Green Belt; the NPPF presumption against development of the Green Belt; the recommendation of the 2015 Green Belt study that local authorities should undertake careful master planning and development so that harm [to the Green Belt] is minimised (SA 3.15); the planning inspector's view that Kidlington's own housing needs can be addressed under PV3 rather than requiring a local review of the Green Belt (SI3.25); the NPPF requirement that local authorities should have regard to the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary (SI4.15); and to Cherwells' own stated objectives to protect and respect individual settlements (SI 3.2), strictly control development in open countryside (SI3.6), carefully consider in relation to the Green Belt and its purposes [proposals for] any further housing growth in Kidlington to accommodate unmet housing need from elsewhere (SI3.26), avoid sprawl and coalescence and harm to the identity of existing settlements and protect biodiversity in both designated and nondesignated sites (SI5.37) (SI5.113), protect the canal corridor (SI5.130) and its value as a tourism resource (SI5.87), and strictly control development in open countryside, and in floodrisk areas in Kidlington and along the canal (SI5.133/4).
PR-A-043	E & R Moore	SCI	Before setting out our comments on this planned Review, we would like to register a protest at the number of major consultations that are running consecutively or within a very short time frame of each other. These are major, lengthy and complex documents to read and comment on, and time pressures or health or other life events, and even limited IT skills, must preclude many people's participation in this consultative process. To encourage public participation and support the democratic process, please could you leave more time between major consultations, or give us a longer consultation period. The following comments are – we apologise probably not in the required format, but we found it impossible to respond to the battery of formal questions inserted in such lengthy documents that we can only scan onscreen, in the time available. Thank you.
PR-A-044	J Pilgrim	1	No. It is derived from the Oxfordshire SHMA which has simply been accepted by the Council and not subjected to serious independent scrutiny. The SHMA was drawn up by private consultants who largely work for the development industry and therefore have a conflict of interest. Its figures are much too high, far in excess of previous trends and difficult to justify. I do not accept that the SHMA figures represent either Cherwell's or Oxford's needs.
PR-A-044	J Pilgrim	2	No. The excessive housing figures are already based on unrealistic forecasts of growth in employment. To provide for yet more employment generating development is simply creating a vicious circle.
PR-A-044	J Pilgrim	9	No. Green Belt is a permanent designation. The Green Belt around Kidlington is much valued. National Policy says that housing need is not a reason to build on the Green Belt. The Government, in its manifesto, made a commitment to protect the Green Belt. There are better opportunities in Oxford itself to develop underused sites for residential use and to ensure unoccupied property is fully utilised.
PR-A-044	J Pilgrim	16	Transport networks in this area are already overloaded. I do not believe that current proposals will solve existing problems, let alone those caused by additional growth in Cherwell and elsewhere in the County. The Highway Authority's vision and objectives, that you quote, are vague aspirations and without substance. Improvements to transport networks should be the priority.
PR-A-044	J Pilgrim	24	Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will further damage the natural environment of Cherwell. There is a serious risk of flooding in areas close to Oxford already struggling to handle increased surface water run-off which will be exacerbated by this scale of development.
PR-A-045	Archstone Projects Ltd	1	An apportionment of 3,500 homes from the working assumption of 15,000 homes for Oxford City seems a reasonable approach at this stage. We support the Council's decision to push ahead with the review of the Local Plan based on these principles rather than waiting for the conclusions of the ongoing Oxfordshire Growth Board work.
PR-A-045	Archstone Projects Ltd	6	It would seem logical for the area/s of search for the unmet need to relate well to Oxford City. However, the tests for how well areas relate should be varied and also balance constraints. Areas in close proximity to the City will not necessarily perform better or as well as locations in other parts of the District, which may be less constrained and more conducive to sustainable travel (e.g. by train or Park and Ride).

PR-A-045	Archstone Projects Ltd	7	The LTP4 Oxford Transport Strategy identifies the existing problems in the City of poor air quality and traffic congestion and the challenges for mass transit for future growth. The Strategy should be a key influence in narrowing the area/s of search to focus on sustainable transport corridors and support the County's transport strategies.
PR-A-045	Archstone Projects Ltd	10	Part 1 of the Local Plan was recently adopted before the work by the Oxfordshire Growth Board was sufficiently progressed, so CDC will effectively be identifying additional housing supply specifically for meeting Oxford's needs. However, both authorities form part of the same housing market area and the need of Oxford is already affecting the availability and affordability of housing in Cherwell District. So in reality, identifying a supply of additional sites in the District and attributing them specifically to Oxford would be artificial and very difficult to monitor in terms of the need they are addressing.
PR-A-045	Archstone Projects Ltd	11	The work by the Oxfordshire Growth Board has acknowledged the extent of the unmet housing need for Oxford City. The urgent need for new housing related to Oxford City is already affecting Cherwell and the surrounding authorities in the market area in terms of affordability and where people choose to live. By helping to meet Oxford's needs, CDC will also be helping to address associated problems in the District. Cherwell is responsible for providing sufficient supply within its administrative boundary to assist Oxford City and will be the authority controlling the development plan and planning permissions. The supply should therefore be aggregated to achieve the objectives of the NPPF to encourage sustainable development to boost housing supply, and to address the current failings in the housing market area. To do otherwise would be artificial and impractical.
PR-A-045	Archstone Projects Ltd	15	Traffic and poor air quality are key planning challenges facing Oxford City. CDC should therefore consider all areas where people (either currently or through improvements to infrastructure) can travel most sustainably to Oxford to reduce traffic and improve air quality. This should include near railway stations and also along main roads which can benefit from park and ride.
PR-A-046		1	No. It is derived from the Oxfordshire SHMA which has simply been accepted by the Council and not subjected to serious independent scrutiny. The SHMA was drawn up by private consultants who largely work for the development industry and therefore have a conflict of interest. Its figures are much too high, far in excess of previous trends and clearly unrealistic. I do not accept that the SHMA figures represent either Cherwell's or Oxford's needs. I would like to see an independent group, i.e., none connected to development in any remote way, prepare a study. Results, then, might be worth considering seriously.
PR-A-046	B Seymour	2	The excessive housing figures are already based on unrealistic forecasts of growth in employment. To provide for yet more employment generating development is simply creating a vicious circle. Employment need should be natural self-generating growth, not artificially implanted.
PR-A-046	B Seymour	9	No. Green Belt is a permanent designation. The Green Belt around Kidlington is much valued. National Policy says that housing need is not a reason to build on the Green Belt. The Government, in its manifesto, made a commitment to protect the Green Belt.
PR-A-046	B Seymour	16	Transport networks in this area are already overloaded. I do not believe that current proposals will solve existing problems, let alone those caused by additional growth in Cherwell and elsewhere in the County. The Highway Authority's vision and objectives, that you quote, are vague aspirations and without substance. There are already too many private vehicles. Each house/home has 3, sometimes more, vehicles parked in front. Paved-over front gardens have become parking lots. More chaos on the roads will accompany more housing. Cyclists (and I am one) continue to be in danger and will be even more so with frustrated, nasty, ill-tempered, ill-trained drivers taking it out on us.
PR-A-046	B Seymour	24	Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will further damage the natural environment of Cherwell. Considering the increase in private vehicles that further housing will engender air pollution can only increase.

PR-A-047	JLL / Church Commissioners for England	10	<p>The formation of a specific housing land supply to meet Oxford City's needs would need to be carefully formulated and considered to ensure that it is consistent with the evidence base underlying the SHMA.</p> <p>Such a policy is also likely to be difficult to formulate, as sites in the District are likely to contribute to both housing needs at a District level and those in the wider Strategic Housing Market Area (SHMA). We will carefully monitor any future policy proposed by the Council to ensure that the practical implications for the delivery of the District's housing land supply are properly understood.</p>
PR-A-047	JLL / Church Commissioners for England	11	<p>Whilst the District has identified strategic sites to meet its own housing needs over the plan period, it has not allocated land that could provide for Oxford City's needs or smaller housing sites (the latter being considered in Part 2).</p> <p>We welcome the Council's acknowledgement at Paragraph 5.11 that the NPPF requires, amongst other things, the Council to ensure that the Partial Review meets the full, objectively assessed needs for the SHMA, and in addition, that CDC should review the supply of housing annually.</p> <p>To assist the 5 year housing land supply, CDC should ensure that there is sufficient flexibility in planning policy for sites to move from employment (where such uses cannot be attracted), and released to deliver dwellings which will contribute to the District's five year housing land supply. This flexible approach is in line with Paragraph 22 of the NPPF, and will assist CDC in accommodating the additional housing required in the District. This flexible approach will also reduce the pressure to release greenfield land to accommodate housing growth elsewhere in the District.</p>
PR-A-047	JLL / Church Commissioners for England	15	<p>Site submission - Land East of Banbury Business Park. Please see answers to Questions 10-12 and note the role that redundant or underutilised employment land could play in contributing to the District's housing supply. Such locations should be reviewed to assess their potential as potential housing sites, particularly where the demand for employment land is limited.</p> <p>We have suggested that the Land East of Banbury Business Park should be considered as a potential housing location in our Call for Sites submission.</p>
PR-A-047	JLL / Church Commissioners for England	12-14	<p>Paragraph 5.37 states that: <i>'the Partial Review will need to accommodate additional housing growth in a way that complements the Local Plan Part 1's approach of creating and supporting inclusive communities in quality urban and rural environments; avoiding sprawl and harm to the identity of settlements'</i> .</p> <p>In order to accommodate this additional housing growth in a sustainable way, a flexible approach should be taken to enable employment land to be brought forward for residential uses where demand for the employment use cannot be secured in line with Paragraph 22 of the NPPF. This approach (to review the potential of such sites to contribute to the District's housing supply) will contribute to the aims of the Part 1 Partial Review by promoting, creating and supporting inclusive communities in quality urban and rural environments. It will also assist in reducing urban sprawl and harm to the identity of settlements, and should also ensure that housing growth is focused to areas where sufficient infrastructure is provided. We expand on this further in our response to Part 2.</p> <p>We reserve the right to make further comments as the Partial Review of Part 1 Local Plan progresses.</p>
PR-A-047	JLL / Church Commissioners for England	20+21	<p>We welcome Paragraph 5.79 which recognises that in formulating Local Plans, Local Planning Authorities (LPAs) are expected to support existing business sectors, and take into account whether businesses are expanding or contracting.</p> <p>Paragraph 5.79 also acknowledges that policies should be flexible enough to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in economic circumstances. This approach is welcomed as it is in line with the Paragraph 22 of the NPPF.</p>

PR-A-047	JLL / Church Commissioners for England		11 CDC should ensure that there is sufficient flexibility in the Local Plan for sites to be released from employment uses (where such uses cannot be attracted) so that residential dwellings can be delivered which will contribute to the District's five year housing land supply. This flexible approach is in line with Paragraph 22 of the NPPF, and will assist CDC in accommodating the additional housing requirements in the District. This flexible approach will also reduce the pressure to release greenfield land to meet the housing requirements under Parts 1 and 2 of the Local Plan.
PR-A-047	JLL / Church Commissioners for England		11 There is sufficient protection of employment land in Part 1 and any greater protection in Part 2 would reduce the flexibility to bring forward employment land for alternative uses (in situations where there is limited demand for employment). Policy SLE1 already provides sufficient protection, and any further protection would not be compliant with Paragraph 22 of the NPPF.
PR-A-047	JLL / Church Commissioners for England	11&15	We have also provided a response to the Council's 'Call for Sites', to highlight the potential of the remaining of remaining land at Banbury Business Park not only for employment uses in the future, but also the potential to accommodate alternative uses, such as residential. Although the previous employment allocation of the remaining employment land should be carried forward into Local Plan as Part 2, it is critical that local planning policy remains sufficient flexible to bring forward alternative uses on the remaining land at the Business Park, if the refreshed marketing campaign for employment uses fails to secure an employment use in the future.
PR-A-048	Historic England	1	No comment.
PR-A-048	Historic England	2	We can see the advantage of supporting additional housing by additional employment-generating development (together with essential facilities and services) to avoid or reduce the need for commuting. However, we also a wider issue here that presumably Oxford's identified housing need is based partly on that needed to support economic growth. If that economic development was then to be provided outside Oxford, it would be reasonable to expect the overall housing need of Oxford to be reduced accordingly. This is a wider issue of where economic growth takes place in the county.
PR-A-048	Historic England	3	Oxford's Key Issues are as set out in the extract from the Oxford City Core Strategy in paragraph 2.24. We would also specifically mention views into and over the city, including those identified in the Oxford Viewcones Study, and how they contribute to the significance of the city and appreciation of that significance, and the need to reduce or minimise travel demand. Paragraph 3.4 – has the land within the district to the north of Oxford any historic significance – have the Historic Environment Record and Historic Landscape Characterisation been checked ? Paragraph 3.19 – Kidlington has a historic centre, recognised by Conservation Area designation. Any proposed development at Kidlington should not have an adverse effect on the character, appearance and special interest of the Conservation Area. Paragraph 3.28 – we welcome the recognition of the conservation areas within the District.
PR-A-048	Historic England	4	We would expect a key principle or goal that additional growth in the District should aim to achieve is the conservation and enhancement of the District's historic environment and the heritage assets therein. This should reflect the Vision.
PR-A-048	Historic England	5	Logically would come before goals, which should contain "without unacceptably affecting Cherwell's natural, built and historic environment".
PR-A-048	Historic England	6	Generally yes, but with the caveat that other considerations also need to be taken into account, including the potential effects on the historic environment.
PR-A-048	Historic England	7	As above, proximity to Oxford City and potential effects on the historic environment, and also transport infrastructure. If employment-generating development is provided alongside the new housing, then the area of search could be wider.
PR-A-048	Historic England	8	Possibly, if employment-generating development and other facilities and services are provided alongside the new housing.

PR-A-048	Historic England	9	Not just on the Green Belt, and if the Green Belt is considered then, as we explain earlier in this letter, the contribution of a site to the purposes of the Green Belt, particularly, given our remit, the purpose to preserve the setting and special character of historic towns, will obviously be a major issue.
PR-A-048	Historic England	13	The conservation and enhancement of the historic environment and the heritage assets therein.
PR-A-048	Historic England	14	“to not unacceptably affecting Cherwell’s natural, built and historic environment”.
PR-A-048	Historic England	15	Locations with an existing or potential adequate range of employment opportunities, facilities, services and infrastructure, and which would not unacceptably affect the District’s natural, built and historic environment.
PR-A-048	Historic England	22	The National Planning Policy Framework (NPPF) makes it clear that the conservation and enhancement of the historic environment is an integral part of sustainable development (paragraphs 7 and 9).
PR-A-048	Historic England	23	The need to conserve and enhance the significance of heritage assets and their settings should be a consideration when identifying potential development locations to meet Oxford’s unmet needs, both as a potential constraint and as a potential opportunity to secure the future of historic buildings or to better reveal their significance.
PR-A-048	Historic England	26	We welcome paragraphs 5.142 – 5.154. However, paragraph 5.143 could have noted that the NPPF also requires local plans to contain a clear strategy for enhancing the built and historic environment and to identify land where development would be inappropriate, for instance because of its environmental or historic significance.
PR-A-048	Historic England	27	The need to conserve and enhance the significance of heritage assets and their settings should be a consideration when identifying potential development locations to meet Oxford’s unmet needs, both as a potential constraint and as a potential opportunity to secure the future of historic buildings or to better reveal their significance. This consideration should include the contribution of a site to the purpose of the Green Belt to preserve the setting and special character of Oxford.
PR-A-048	Historic England	28	Although we have no sites to put forward, we would respectfully remind the Council of the need to have regard to potential impacts on the historic environment when considering potential housing sites. The National Planning Policy Framework explains that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance.

Information on designated heritage assets can be found on the National Heritage List for England (<http://list.historicengland.org.uk>) and on non-designated heritage assets from the Historic Environment Record. Other potential sources of information include the Oxfordshire Historic Landscape Character Assessment, currently underway, Urban Character Assessments and Conservation Area Character Appraisals. (cont...)

PR-A-048	Historic England	28	<p>(cont...) Historic England expects the policies and proposals of local plans, including development site allocations, to be based on an adequate, up-to-date and relevant evidence base as regards the historic environment. We will look to see how the consideration of impacts on the historic environment has informed the choice of allocation sites. These should include the impacts of any sites proposed in the Oxford Green Belt on its function to preserve the setting and special character of Oxford.</p> <p>Historic England's Good Practice Advice in Planning Note 1 contains advice on the historic environment in local plans: (https://content.historicengland.org.uk/imagesbooks/publications/gpa1-historic-environment-local-plans/gpa1.pdf/) and we have published further advice on site allocations in local plans: (http://www.historicengland.org.uk/images-books/publications/historic-environmentand-site-allocations-in-local-plans/). Advice on the setting of heritage assets is given in Historic England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (https://content.historicengland.org.uk/imagesbooks/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/). (cont...)</p>
PR-A-048	Historic England	28	<p>(cont...) We would be pleased to offer comments on potential sites as regards the potential impact on the significance of designated heritage assets, in confidence if necessary, and further advice should be sought from your Conservation Officer and Archaeological advisor.</p>
PR-A-048	Historic England	10-12	No comment.
PR-A-048	Historic England	16-21	No comment.
PR-A-048	Historic England	24+25	No comment.
PR-A-048	Historic England		<p>9 We note the preparation of the Oxford Green Belt Study and its having been undertaken through the Oxfordshire Growth Board under the Duty to Cooperate. As noted above, the Duty also applies to Historic England and we are surprised that we do not appear to have been offered any opportunity to comment on the study before now.</p> <p>Therefore, whilst we are pleased to see that the study has assessed the extent to which the Green Belt has performed against the purpose to preserve the setting and special character of historic towns, we are not in a position to endorse or necessarily agree with the study's findings in this respect.</p> <p>The contribution of a site to the purposes of the Green Belt, particularly, given our remit, the purpose to preserve the setting and special character of historic towns, will obviously be a major issue to be considered in identifying possible sites to help meet Oxford's unmet housing need. In addition, the consideration of impacts on the historic environment should inform the choice of allocation sites.</p>
PR-A-048	Historic England		<p>28 We have published advice on site allocations in local plans: (http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/). Advice on the setting of heritage assets is given in Historic England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/).</p>

PR-A-048 Historic England

As regards the Sustainability Appraisal, general advice on Sustainability Appraisal and the historic environment is set out in Historic England's publication "Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment": https://content.historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf/. We also have the following detailed comments.

In paragraph 2.45, it could be noted that the NPPF requires local planning authorities to set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment.

In paragraph 3.20, the historic environment does not just include designated heritage assets – the NPPF gives a broad definition of the "historic environment". We consider that the historic environment includes areas, buildings, features and landscapes with statutory protection, together with those parts of the historic environment which are locally valued and important and also the historic character of the landscape and townscape. (cont....)

PR-A-048 Historic England

(cont...) Does the District Council have an up-to-date and comprehensive "local list" ? If not, then this should be identified as a gap in the baseline knowledge. Reference should be made to the Oxfordshire Historic Environment Record and the Oxfordshire Historic Landscape Characterisation (currently being completed). There are currently four listed buildings on the Heritage at Risk Register.

In Table 4.1, not all the historic environment is "built", nor is it entirely composed of "areas". We suggest that the Key Sustainability Issue for the historic environment be "Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings and addressing heritage assets at risk from neglect, decay, or development pressures".

PR-A-049 Aylesbury Vale District Council

We have no comments to make on the Oxford's Unmet Need and Development Management Policies and Sites Issues Papers.

PR-A-049 Aylesbury Vale District Council

17 We acknowledge that the Oxfordshire Strategic Housing Market Assessment document identifies that the Full Objective Assessed Need for Housing in Cherwell to be 22,800 dwellings over the 20-year period 2011-31, equivalent to an average of 1,140 dwellings per year. We acknowledge and support that Cherwell intends to accommodate the unmet need from Oxford of up to 3,500 dwellings that cannot be met by Oxford City Council but is not seeking to accommodate any unmet housing need in Aylesbury Vale.

We also acknowledge that Cherwell District Council is currently exploring the provision of a new junction on the M40, to the south of Junction 9, near to Arncott. This proposal is supported by AVDC.

We recognise the need to work co-operatively and confirm our continued support to ensure we can demonstrate this co-operation when we get to examination of the authority's plans. We hope our comments are helpful and look forward to continuing to work with you in your Local Plan production. We welcome the opportunity to be engaged in the next steps of the plan making as part of the Duty to Co-operate.

PR-A-050 Duns Tew Parish Council

6

Yes.

PR-A-050	Duns Tew Parish Council	7	As This is to support Oxford's needs the area should be close to Oxford.
PR-A-050	Duns Tew Parish Council	8	No.
PR-A-050	Duns Tew Parish Council	9	Yes.
PR-A-050	Duns Tew Parish Council	10	Yes.
PR-A-050	Duns Tew Parish Council	11	a) Development should be directed towards Kidlington as the area already has the Services and Infrastructure. b) build in the Green Belt and extend the line of the Green Belt To compensate c) Consider developing some of the Open Spaces around Oxford For Example Oxford Golf Course.
PR-A-051	Mike Gilbert Planning and VSL & Partners	1	3,500 homes is a minimum for Cherwell to accommodate to meet its share of Oxford's unmet housing needs. The number of additional homes that will need to be provided as a share of the total of requirement of 15,000 homes is likely to be between 3,500 and 4,500.
PR-A-051	Mike Gilbert Planning and VSL & Partners	2	No. The purpose of the Local Plan Partial Review is to address Oxford's major housing shortage. The adopted Local Plan already enables the growth of Langford Lane/Oxford Technology Park and Begbroke Science Park in Kidlington's hinterland to help provide for Oxford's overflow business needs. The two issues can be joined up by providing the necessary additional housing on appropriate sites in Kidlington's hinterland. There is no need, therefore, to plan for additional employment development.
PR-A-051	Mike Gilbert Planning and VSL & Partners	4	Key principles to achieve: - Given Kidlington's role as a main urban centre and its close physical and economic links with Oxford, the vitality of Kidlington and its ability to serve its hinterland need to be promoted; - Additional development needs to be concentrated in sustainable locations and the thriving rural community around the main urban centre of Kidlington needs to be supported; - Unused sites of a lesser environmental value and unconstrained by environmental designations need to be brought forward; - The identity of individual settlements needs to be protected by avoiding coalescence; and - Growth needs to be enabled in areas with excellent transport infrastructure to ensure the fullest possible use is made of public transport, walking and cycling.
PR-A-051	Mike Gilbert Planning and VSL & Partners	6	Yes. The purpose of the Local Plan Partial Review is to address Oxford's major housing shortage. It is self-evident, therefore, that the additional housing development needs to be located close to Oxford and transport routes into Oxford. This will also accord with the requirements of the NPPF and the overall strategy of the adopted Cherwell Local Plan Part 1 to deliver sustainable development.
PR-A-051	Mike Gilbert Planning and VSL & Partners	7	Proximity to both Oxford and transport routes into Oxford.
PR-A-051	Mike Gilbert Planning and VSL & Partners	8	No. As the purpose of the Local Plan Partial Review is to address Oxford's major housing shortage the required additional housing development needs to be located close to Oxford.
PR-A-051	Mike Gilbert Planning and VSL & Partners	9	Yes. The extent of the Oxford Green Belt is a clearly defined geographical area and lies close to Oxford. It is the obvious "area of search" for additional development sites needed to meet Oxford's unmet housing needs.

PR-A-051	Mike Gilbert Planning and VSL & Partners	10	Yes. That will enable developments aimed at meeting the distinct housing needs of Oxford and Cherwell District to be effectively monitored.
PR-A-051	Mike Gilbert Planning and VSL & Partners	11	The strategy for meeting Oxford's unmet housing needs must be consistent with the overall strategy of the adopted Cherwell Local Plan Part 1 and the requirements of the NPPF. Following on from Question 9, the separate monitoring of the five year housing land supply relating to Oxford's unmet housing needs could tie in with the geographical area of the Oxford Green Belt within Cherwell as current planning constraints in this area mean that it contributes little towards meeting the housing needs of Cherwell District.
PR-A-051	Mike Gilbert Planning and VSL & Partners	15	Sites should be adjacent to existing larger settlements, close to both Oxford and transport routes into Oxford, and located where people will have a real choice in how to travel - including sites that are currently protected by the Green Belt. Unused sites which are well located and which, according to the Green Belt Study, contribute least to the purposes of including land within Green Belts should be released from the Green Belt and so made available for development.
PR-A-051	Mike Gilbert Planning and VSL & Partners	28	Site submission - Land South of Solid State Logic Headquarters, Spring Hill Road, Begbroke. Yes. Please see the attached site submission form, site location plan and letter dated 10 March 2016 promoting the land on the southern edge of Begbroke. The land is unused rough grassland. It is deliverable, developable and in a sustainable location.
PR-A-051	Mike Gilbert Planning and VSL & Partners	22+23	There is the opportunity to join up the two issues of helping to provide for Oxford's overflow business needs within Kidlington's hinterland through the planned growth of Langford Lane/Oxford Technology Park and Begbroke Science Park (Policy Kidlington 1 of the adopted Local Plan) and providing for Oxford's unmet housing needs by developing appropriate sites also within Kidlington's hinterland.
PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	1	The Issues Consultation Document Part 1 notes (para 2.16) that if the 15,000 homes were proportioned on a pro rata basis across the Oxfordshire Authorities (including Oxford CC) this would result in a need for Cherwell to address an unmet need of 3,000 homes. In the first instance we query how Oxford City Council can meet its own "unmet need" - if it were able to meet this need it would, by definition, not be "unmet". Cherwell go some way to acknowledge this (para 2.17) recognising that "this figure would potentially increase for the rural districts if Oxford's contribution was to be less than 3,000". They go on to acknowledge that the level of need may change if "the overall countywide level of unmet need changes or if the countywide work shows that there are significant differences between the relative sustainability of potential options . . . meaning one authority should take more or less than another."
PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	1	(cont...) Our clients concur with this analysis. Furthermore, relative to the other Oxfordshire Authorities (excluding Oxford CC) Cherwell is relatively unconstrained as shown in Map 3 of the Issues Consultation document. Specifically it lacks the significant extent of Areas of Outstanding Natural Beauty (AONB) that West Oxfordshire, Vale of White Horse and South Oxfordshire respectively all have. These factors, coupled with the strong transport links and other relationships Cherwell has with Oxford, may well lead to CDC's share of the unmet need being proportionately higher than this as the extent of Oxford's unmet need may not be divided equally between the authorities. We do not therefore consider that 3,500 homes is a reasonable working assumption for Cherwell in seeking to meet Oxford's unmet need. Any one of the factors that we have identified would lead to a higher level of housing need than and, in aggregate, the need could be substantially higher.

PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	4	<p>The key principle will be establishing appropriate sustainable locations for Oxford's unmet need to be accommodated throughout the District. The NPPF is clear (para 14) that the "presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking."</p> <p>Such an approach is consistent with that set out within the current Local Plan (summarised in the Issues Consultation Document – para 3.28) that whilst seeking to focus the majority of development in urban locations it also "identifies a sustainable hierarchy of villages which will inform the distribution of growth across the rural areas."</p>
PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	6	<p>Our clients do not consider that it is appropriate to identify either an "Area of Search" or "Plan Area" for the partial review document. The evidence base, primarily the 2014 SHMA, identifies a single Housing Market Area within Oxfordshire and offers no support for an approach of defining an "area of search" for locations to meet the identified unmet need from Oxford.</p> <p>They are concerned that if such an "area of search" was identified and formed the basis of Cherwell's attempts to meet additional housing growth including unmet need it may well preclude sustainable locations falling outside the area of search therefore both conflicting with the NPPF and resulting in a sub optimum approach across the District. (cont...)</p>
PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	6	<p>(cont...) We recognise (para 4.7) that parts of the district have more direct relationship with Oxford for different reasons but the SHMA indicates that cross district migration has produced, and will continue to produce, complex housing market sub areas. The provision of housing in a range of sustainable locations across the District will best meet the twin objectives of sustainability and addressing unmet need from Oxford.</p> <p>Whilst Bloxham benefits from reasonably good links with Oxford (enabling it to assist in meeting unmet need from the City) it can also address other housing need arising within Cherwell which in turn will free up new residential development in locations physically closer to Oxford.</p>
PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	7	<p>As set out above, our clients do not consider it is appropriate to identify an 'area of search', instead consider that CDC should focus on promoting development in sustainable locations throughout the District, including Bloxham.</p>
PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	8	<p>Yes, for the reasons we summarise above or clients consider this would be the most appropriate way to deal with meeting Oxford's unmet needs.</p>
PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	10	<p>Our clients do not consider that CDC should pursue two separate 5 year land supplies. A single HMA has been identified within Oxfordshire, the reality is that housing need in Cherwell and the unmet needs arising from Oxford are not distinct but overlapping, and should therefore be considered as part of one housing requirement / supply.</p>
PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	15	<p>As set out above, we consider that the need should be met throughout the entire district focussing on sustainable locations for development in line with the NPPF.</p> <p>We consider that Bloxham as "one of the most sustainable villages in the District" is well placed to contribute to meeting this need. Both the 2014 SHLAA and consultation response to a recent planning application on part of our clients site confirming it's suitability for housing endorse this approach.</p>

PR-A-052	Nathaniel Lichfield & Partners / Taylor Wimpey Oxfordshire	28	<p>Site submission - Land North and South of Milton Road, Bloxham. We note that the Part 1 Partial Review seeks the submission of strategic sites of 100 dwellings or more.</p> <p>Our clients consider that land within a central area in Bloxham, part of which the 2014 SHLAA has already identified “could be suitable for residential development” is capable of meeting residential need (of between 200 and 250 dwellings).</p> <p>In addition to this level of residential development the site is also capable of accommodating a primary school in view of the constraints experienced within the current facility.</p> <p>We expand upon our analysis of this site in our response to the “Call for Stes” at Section 5.0 of this report.</p>
PR-A-053	Bilfinger GVA / London Oxford Aviation Services Ltd	2	<p>The NPPF encourages Planning Authorities to progress housing and employment growth as linked strategies, as ensuring a joined-up approach to assessing need/land supply and the planned spatial distribution of these uses is a key element in ensuring sustainable development (particularly at a strategic level).</p> <p>LPP1 sets out employment land policies to meet the local needs identified as part of the preparation of that plan, which includes the removal of part of the LOA site from the Green Belt. However, the partial review to LPP1 has stepped beyond local matters and is required to tackle county-wide strategic planning needs. While this is primarily focussed on housing, it is our view that other key uses (principally employment, alongside infrastructure) should be dealt with at the same time as part of a joined-up strategy in order to ensure the proper planning of the district and county as a whole. (cont...)</p>
PR-A-053	Bilfinger GVA / London Oxford Aviation Services Ltd	2	<p>(cont...) The dispersal of what otherwise would have been Oxford’s resident population offers the opportunity to capture economic activity/output within Cherwell which might otherwise have been in Oxford. This offers an opportunity to realise potential economic benefits for the district that would have otherwise been unachievable. It is our view that optimising potential economic benefits is dependant on a joined-up approach to housing and employment matters.</p> <p>This translates into an opportunity to unlock more ambitious economic development at existing and planned employment clusters, either directly through introducing a greater scale of employment and/or complementary mixed use development (including housing), or indirectly by facilitating infrastructure delivery. This is particularly relevant when considering ‘strategic’ employment locations such as London Oxford Airport which have a functional economic relationship with Oxford, the other Oxfordshire Authorities, and beyond (in terms of employee in/out-commuting patterns and supply chains), and which have their own economic challenges and development needs.</p>
PR-A-053	Bilfinger GVA / London Oxford Aviation Services Ltd	4	<p>The requirement to accommodate additional housing growth in the district creates an opportunity for existing Cherwell residents and businesses in terms of harnessing the value generated by this strategic development to deliver economic benefits, new/improved infrastructure, and a more sustainable pattern of development to the district.</p>
PR-A-053	Bilfinger GVA / London Oxford Aviation Services Ltd	28	<p>Site submission - London Oxford Airport. The enclosed Position Paper sets out the case for the removal of the London Oxford Airport site from the Green Belt alongside a site specific policy which supports mixed use development, to include a retained/enhanced aviation function, employment uses, transport infrastructure, housing, and associated supporting uses.</p>
PR-A-053	Bilfinger GVA / London Oxford Aviation Services Ltd	6-9	<p>We consider the factors set out at para 4.8 to be an appropriate set of criteria against which alternative spatial options for the location of housing growth should be appraised. In addition, consideration should be given to how housing growth could complement/support existing strategic employment locations and support economic growth as a direct benefit.</p>

PR-A-054	Gladman Developments	1	<p>Gladman has already set out their concerns over the seemingly premature nature of this consultation at a time when the full evidence base is not complete and the proportion of the unmet need that Cherwell will have to deliver is unknown.</p> <p>The working assumption that Cherwell will need to deliver 3,500 additional units to meet Oxford's unmet housing need is crude (based on a simple mathematical calculation) and for example, assumes that 3,000 units can be delivered within Oxford City itself which is surprising given it is Oxford City's unmet need that is being addressed. Removing the apportionment from Oxford City and distributing it evenly across the other Oxfordshire Districts would mean that Cherwell would have to accommodate at least 3,750 units. (cont...)</p>
PR-A-054	Gladman Developments	1	<p>(cont...) The evidence base needs to be far more sophisticated in terms of assessing the most logical, appropriate and deliverable strategy that will best meet Oxford's needs in a sustainable way. A study which seeks to assess key issues such as major constraints, travel to work data, public transport corridors, road infrastructure, evidence of historic house moves out of Oxford etc. will allow the apportionment of Oxford's unmet need to be more systematic, robust and transparent. Options can then be tested through other evidence base documents such as the Sustainability Appraisal and viability testing to ensure the option chosen is the most appropriate tested against reasonable alternatives and is deliverable.</p>
PR-A-054	Gladman Developments	2	<p>The key to addressing the additional housing required is to treat it simply as an increase to the overall objectively It is considered to be unnecessary to provide additional employment within Cherwell as a result of accommodating Oxford's unmet housing needs. Any additional employment provided within Cherwell would require additional housing beyond Oxford's unmet need to support the additional workforce.</p>
PR-A-054	Gladman Developments	3	<p>There are a number of key issues that need to be considered through the process of meeting the City's unmet housing needs.</p> <p>The City is one of the most unaffordable places to live in England where first time buyers, families and new employees seeking to move to the City struggle to find suitable accommodation to rent let alone buy. This causes major issues for recruitment, attracting 'key workers', and staff retention and has other associated consequences such as congestion as people seek to get into the city from other more affordable areas to access employment.</p> <p>The City also faces significant issues with various constraints including Green Belt, maintaining the historic environment flood risk and other environmental constraints which all need to be considered when seeking to meet the unmet housing needs of the City within the neighbouring local authority areas.</p>
PR-A-054	Gladman Developments	12-15	<p>The existing Cherwell Local Plan concentrates new development upon the major towns of Bicester and Banbury with Sustainable Urban Extensions of a significant scale. It is considered that these towns do not offer a suitable location for additional sites to meet Oxford's unmet housing needs as they will not be delivered in the short term because of the existing focus of development on these areas.</p> <p>Kidlington, which is a large rural settlement is surrounded by Green Belt and was looked at for further allocations through Part 1 of the Cherwell Local Plan adopted in 2015 including a small scale Green Belt review. It is therefore also considered that Kidlington offers extremely limited scope for new sites to meet Oxford's unmet housing need. (cont...)</p>

PR-A-054 Gladman
Developments 12-15

(cont...) Gladman therefore agree with the statement made in para 5.36 of the Issues Consultation that the Council will have to consider all reasonable locations for contributing to meeting Oxford's unmet need, although we disagree that this should be limited to areas closest to Oxford. Sustainable sites located on the edge of the sustainable larger villages must be considered as suitable, sustainable and deliverable locations for meeting the unmet needs of Oxford in the short term, increasing choice to both house builders and house buyers thereby increasing the supply and delivery of housing. These sites are often free from constraints, can be delivered quickly and without major investment in new infrastructure. These sites will complement the large scale sites allocated in the adopted Local Plan and will ensure that the Council maintain a healthy and rolling five year supply of housing. They can also be delivered in a way which complements the approach of the adopted Part 1 Local Plan by creating and supporting inclusive communities in quality urban and rural environments; avoiding sprawl and harm to the identity of settlements; minimising environmental impacts; providing access to employment, services and facilities and ensuring sufficient infrastructure is provided.

It is therefore considered that the key specific housing objective that needs to be considered for meeting Oxford's unmet housing need is that it is met in full and without delay, across the plan period and within the district of Cherwell as part of the Oxfordshire HMA.

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As stated above, Cherwell District forms part of the Oxfordshire HMA and paragraph 47 of the Framework states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing across the housing market area.

There is therefore, no specific requirement to identify sites that relate well to Oxford City in order to deliver the additional housing required within the HMA. Proximity and/or connectivity to Oxford may be one criteria that is assessed in the overall consideration of which sites to allocate for residential purposes, but this must be weighed in the balance amongst many other economic, social and environmental factors including importantly, deliverability.

The existing Local Plan allocates a considerable level of new development to the major towns of Bicester and Banbury. These sites are large in scale and will take a considerable amount of time to deliver in full. Scope for further allocations around these two towns through this process is therefore extremely limited and questionable in terms of actual deliverability. (cont...)

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(cont...) Therefore, in allocating sites to maximise housing supply the widest possible range of sites by size and market location are required, so that house builders of all types and sizes have access to suitable housing land in order to offer the widest possible range of products. The key to increasing housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else being equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary, a variety of sites in the widest possible range of locations ensure all types of house builder have access to suitable land, which in turn will assist the Council in maintaining a flexible and responsive housing land supply, ensuring increased housing delivery.

The Partial Review of the Local Plan should therefore look to allocate a range of sites of a variety of sizes in a wide range of locations principally centred around the larger sustainable villages within the district that are not constrained by Green Belt in order to provide deliverable sites and choice in the market for both house builders and house buyers. (cont...)

PR-A-054	Gladman Developments	6-9	<p>(cont...) The extent of the unmet housing need in Oxford and the immediate urgency of addressing this need to tackle the key issues of affordability and meeting the economic aims of Oxfordshire is such that sites that are allocated must be deliverable in the short term and should be located in a variety of settlements to provide extensive choice and speed up housing delivery.</p> <p>Whilst Green Belt locations should not be automatically excluded from consideration in the assessment of sites suitable for allocation, this must be weighed in the balance of all relevant factors with the knowledge that it is a constraint that is considered by the Framework to be restrictive. The policy test that applies to the removal of sites from the Green Belt is formidable and the need to justify exceptional circumstances for such a change must be considered to be an extremely high hurdle to overcome. Therefore, Green Belt releases should only be considered where alternative strategies for the delivery of the additional housing, such as sites surrounding the sustainable larger villages which are not constrained by Green Belt, have been exhausted.</p>
PR-A-054	Gladman Developments	10+11	<p>Gladman would object strongly to the identification of a specific housing land supply for Oxford's unmet needs with a separate five year supply calculation.</p> <p>As stated previously, housing needs must be met, in full, across the housing market area and for the purposes of Cherwell the housing market area is Oxfordshire. Therefore, any separation of the five year housing land supply calculation would be contrary to the Framework and therefore unsound.</p> <p>The unmet housing needs of Oxford are present now and need to be addressed in the short term to rectify the lack of housing supply, deal with affordability and increase economic prosperity. A separate five year housing land supply that relates specifically to Oxford would only serve to delay much needed housing delivery and would run counter to the need to boost significantly the supply of housing. (cont...)</p>
PR-A-054	Gladman Developments	10+11	<p>(cont...) It is considered that the requirement to meet Oxford's unmet housing need in Cherwell would not undermine the existing Cherwell strategy for delivering growth as the exercise should simply be seen as the need to deliver a higher OAN for the Oxfordshire HMA partly within Cherwell District.</p> <p>In addition, as the Local Plan runs from 2011, as does the Oxfordshire SHMA which sets out the OAN for Oxfordshire, there is already a substantial backlog of unmet housing need from Oxford (2011-2016) which needs to be met immediately. In addition, Cherwell have never met their own housing requirement (1,142 dpa) since 2011 and is therefore an authority where the 20% buffer applies, further exacerbating the unmet need issue.</p> <p>Therefore, sites should be identified through the Part 2 Development Management Policies and Sites document, which is also currently out for consultation, to meet the higher OAN number including Oxford's unmet need and Cherwell's housing requirement with a 20% buffer, within the sustainable larger villages which are not constrained by Green Belt to ensure delivery in the short term with no additional delay.</p>
PR-A-054	Gladman Developments	22+23	<p>Sustainability is not just about the environmental aspects. It is a balance of economic, social and environmental factors that all carry equal weight and should be considered alongside each other, through the Sustainability Appraisal when considering the most appropriate strategy for meeting Oxford's unmet housing need through the Partial Review.</p>

PR-A-054	Gladman Developments	24+25	<p>Consideration of the natural environment in the formulation of the strategy for the delivery of Oxford's unmet housing needs should be in line with the guidance set out in the Framework paragraphs 109 to 125.</p> <p>It is particularly pertinent to highlight that paragraph 109 states that the planning system should contribute to and enhance the natural environment by protecting and enhancing valued landscapes and paragraph 113 states that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status.</p> <p>Landscape designations, outside of those specifically mentioned in footnote 9 of the Framework, are therefore not to be considered as absolute constraints. They are simply environmental considerations that should be factored into the balance of sustainability when identifying the most appropriate strategy and sites for meeting Oxford's unmet housing needs.</p>
PR-A-054	Gladman Developments	26+27	<p>Consideration of the built and historic environment in the formulation of the strategy for the delivery of Oxford's unmet housing needs should be in line with the guidance set out in the Framework paragraphs 126 to 141.</p> <p>Historic assets are not to be considered as absolute constraints, they are simply environmental considerations that should be factored into the balance of sustainability when identifying the most appropriate strategy and sites for meeting Oxford's unmet housing needs.</p>
PR-A-054	Gladman Developments	4+5	<p>It is difficult at this stage to comment upon suitable principles, goals and vision for meeting Oxford's unmet needs until the evidence base is complete and Cherwell are aware of the issues that they have to address. The principles, goals and vision will flow to some extent from the evidence base but also from the more strategic work that is being undertaken by the Growth Board. It is this strategic vision for the whole of Oxfordshire that should be reflected in the update to the vision and which will form the basis of the principles and goals as this exercise is about meeting the needs of the entire county rather than just the local authority area.</p> <p>Obviously these strategic aims may have to be amended to reflect a local context relevant to Cherwell but they must be based on achieving the aims of the strategic plan as set out by the Growth Board.</p> <p>The key overriding principle that needs to be reflected through the Partial Review is that the unmet needs of Oxford City are delivered in full, across the Oxfordshire HMA in a sustainable, deliverable and transparent manner to ensure that the economic prospects of the region are realised and people have access to suitable and affordable accommodation which they cannot attain within Oxford City.</p>

<p>PR-A-055 Oxalis Planning / Cuvette Property Consulting Ltd</p>	<p>16</p>	<p>We welcome that the Issues document includes sections on Transport, as well as Infrastructure and the Economy, and strongly support Cherwell District Council's apparent intention to consider the issues of Oxford's unmet housing need in a comprehensive and holistic way.</p> <p>However, a number of key transport issues, and associated land-use planning issues, are missing from the consultation document and should feature in the subsequent stages of the partial review. In particular, there is no reference or cross-reference to freight and distribution related transport. While the focus on the movement of people is understood given the general focus on housing and population, this should not be at the expense of also considering the needs for transport connectivity to enable the movement and storage of goods and materials.</p> <p>Related to this, the need for additional logistics or distribution development sites in Cherwell should be explicitly considered as part of the partial review. Along with planning to meet housing needs, this too forms an essential part of the local, sub-regional and national economy, and brings with it a need for development land in suitable and sustainable locations. We have also made representations to the Part 2 Local Plan Issues consultation regarding the issue of strategic logistics sites. However, our view is that this is a strategic issue and as such is appropriate within the partial review which should consider the need to allocate additional employment strategic sites suitable for logistics or distribution development. (cont...)</p>
<p>PR-A-055 Oxalis Planning / Cuvette Property Consulting Ltd</p>	<p>16</p>	<p>(cont...) Supporting and enabling the continued growth of Oxford through cross-boundary cooperation is clearly a requirement upon Cherwell District. The District already faces a number of challenges, including reducing out-commuting, and the charts on page 47 of the consultation document help to illustrate the significant scale of the commuting flows from Cherwell to Oxford. The transport section of the consultation document identifies a number of key issues, including the County Council's estimate that despite the high levels of congestion already seen in many parts of the City, there could be a 25% increase in journeys within the City of Oxford by 2031, with approximately 13,000 more commuter trips each day.</p> <p>If Cherwell is to accommodate significant additional housing growth to help meet Oxford's needs, and in the context of the objective to reduce out-commuting, it is appropriate to reconsider strategic employment land requirements as part of the debate about the distribution of additional housing demand from Oxford. We consider this essential if Cherwell is to positively address the challenges posed by the high levels of out-commuting, and if the collective efforts of the two local authorities and the County Highways Authority to address congestion are to have any impact.</p>

<p>PR-A-055 Oxalis Planning / Cuvette Property Consulting Ltd</p>	<p>20</p>	<p>We welcome that the Issues consultation document includes a section on the Economy, as well as sections on Infrastructure and Transport. We feel it is essential that the review to consider the most appropriate distribution and scale of housing development to help meet Oxford's unmet needs also consider the associated economic issues.</p> <p>It is clear that Cherwell District and Oxford City share a range of functional and economic cross-boundary relationships. It is also clear that Oxford is highly constrained in terms of the City's administrative boundaries, and the limited availability of potential development land is of direct relevance to employment development as well as for housing. We believe the issues identified for the partial review should include further work relating to the scope for cooperation between Cherwell and Oxford City regarding strategic employment sites alongside consideration of how and where Cherwell accommodates a proportion of Oxford's unmet housing needs.</p> <p>The issue of identifying sites to accommodate large scale logistics buildings was discussed during the Local Plan Part 1 examination process, and the District Council has previously recognised that provision should be made for strategic logistics/distribution development, and that further policy guidance is required. The separate Part 2 Local Plan Issues Consultation document includes a reference to 'further economic assessment work' being planned with regard to large-scale logistics sites, but does not offer any detail as to how or when the issue will be addressed. In our view, having identified this issue previously as a pertinent and relevant strategic local planning issue, the Council should incorporate it into the scope of the partial review of the Local Plan. (cont...)</p>
<p>PR-A-055 Oxalis Planning / Cuvette Property Consulting Ltd</p>	<p>20</p>	<p>(cont...) The 2015 Local Plan Inspector's Report made several comments about the development pressures for large logistics sites, dismissing them as being 'speculative' with reference to the need for such sites as being 'as yet unproven'. We would strongly challenge a number of the Inspector's conclusions and assumptions, and remain of the view that this strategic land-use needs to be actively and explicitly planned for. It would be logical and appropriate to incorporate this issue into the partial review alongside the work needed to revisit the distribution of strategic housing development.</p> <p>It is clear that there are numerous potential development sites in the District, several of which are likely to be well suited to strategic distribution and logistics development. Cuvette is involved in promoting a potential site at Junction 9 of the M40, and are actively seeking to bring this site forward. The site is particularly well placed both in the context of Cherwell District and Oxford City to meet economic development needs, and could play a key role in helping meet demands associated with the cross-boundary growth agenda. The site is located on the motorway network adjacent to the A34, approximately 10 miles from central Oxford, and around 3 miles from central Bicester, with Banbury approximately 17 miles to the north along the M40. A high-quality employment site could meet a range of strategic employment requirements, focused on B8 distribution, but potentially also incorporating B2 industrial space to meet a diverse range of economic sectors and markets. (cont...)</p>

PR-A-055	Oxalis Planning / Cuvette Property Consulting Ltd	20	<p>(cont...) Our technical work to assess and the site is ongoing, but such a proposal would make a significant contribution to the wider economic objectives across the LEP area and Oxford housing market area, including supporting the growth of Cherwell's economy as part of the overall housing and population growth agenda. We are also exploring the opportunities to include new local highways infrastructure to address existing local challenges, and to the benefit of existing local communities nearby. We are keen to discuss these emerging proposals with the Council and to provide plans and other details in due course.</p> <p>Our ongoing work in relation to the potential of this site is a direct response to the strong locational advantages of Cherwell, something which has already seen a number of potential strategic sites emerge earlier in the plan-making process in response to market demand and requirements. The local strength and opportunities of the logistics sector are recognised in the Council's Cherwell Economic Analysis Study of 2012. The SEMLEP Strategic Economic Plan for 2015-2020 identifies Logistics as 'key sector'.</p> <p>As a long-term plan looking ahead to 2031 our view is that the approach of the adopted Local Plan has no flexibility with regard to responding to market signals and economic opportunities. We note that one of the economic challenges facing the District included in the Adopted Local is:</p> <p><i>"new employment sites are needed to meet modern business needs"</i> (cont...)</p>
PR-A-055	Oxalis Planning / Cuvette Property Consulting Ltd	20	<p>The lack of a clear strategy and policies for actively addressing the issue of strategic logistics and other large-scale employment development represents a critical weakness in the Council's response to this challenge. Although advocated by the Inspector, we do not feel it is sound to progress with a planning strategy which provides such limited guidance on this key issue. Given the potential for development early in the plan-period, we don't believe delaying until a subsequent review of the Local Plan is appropriate or sound. The partial review to accommodate additional development provides a natural and logical opportunity to broaden the debate to include associated strategic economic development and employment land issues.</p>
PR-A-056	Kidlington Development Watch	1	<p>No. It is derived from the Oxfordshire SHMA which has never been subject to independent review. Its figures for housing need are wholly unrealistic and, as you know, far in excess of previous trends and likely future outcomes. The SHMA was concocted by private consultants who spend most of their time working for the development industry and have a vested interest in producing the highest figures possible. At both the Cherwell and West Oxfordshire EiPs the principal authors of the SHMA appeared for property developers, and in the case of Cherwell, appeared on the same day for the Council. This is an outrageous conflict of interest which destroys any claim that the SHMA is an objective assessment. The Cherwell Inspector largely ignored evidence of the shortcomings of the SHMA presented to him and was disdainful and dismissive of it at the EiP.</p> <p>The SHMA figures for Oxford's needs are the most contentious in the document and are based on many dubious assumptions as was pointed out, and ignored by the District Council and the Inspector, in the Examination of the Cherwell Plan. They have not been included in any Oxford plan let alone tested at an EiP. They should not be used as the basis for reviewing Cherwell's Local Plan. (cont...)</p>
PR-A-056	Kidlington Development Watch	1	<p>(cont...) In fact the review provides an opportunity to correct the biases in the 2014 SHMA. There should therefore be a critical review of the SHMA and its underlying employment forecasts by a genuinely independent organisation which is not compromised by its links to the development industry and the LEP. This would almost certainly result in lower figures for both Cherwell's and Oxford's needs.</p> <p>In the meantime, the already excessive figure of 22,700 houses within Cherwell's adopted Local Plan, should be more than enough to meet any purported need from Oxford City without any further provision.</p>

PR-A-056	Kidlington Development Watch	2	<p>No. The employment generating development already proposed (or permitted) at Langford Lane, Kidlington, at Begbroke Science Park and just over the District boundary at the so-called Northern Gateway is already excessive. It remains to be seen whether there will be sufficient demand for the “high-tech” science-based industries sought given that there is vacant development land and premises at the Oxford Science Park to the south of the city and in the adjacent Kidlington business park.</p> <p>Your question is also totally illogical as the alleged housing needs are themselves based on exaggerated forecasts of employment growth, which again, as was argued at your EiP, are unrealistic and based on the aspirations of the LEP. To provide for yet more employment generating development will simply fuel an unsustainable vicious circle.</p> <p>Furthermore, the inclusion of any additional development is outside the scope of this consultation which is to address Oxford’s hypothetical overspill requirements.</p>
PR-A-056	Kidlington Development Watch	3	<p>The most important issue for Oxford is to achieve a balance between taking advantage of the benefits deriving from its internationally renowned university and limiting growth to levels which do not destroy the very things (such as the historic city centre) which make it an attractive location.</p> <p>The City Council has not got this balance right. It is encouraging employment generating developments, such as the Northern Gateway for which the demand is not proven and then using such developments to fuel demand for housing, making its self-confessed housing affordability problem worse.</p> <p>The City Council has not demonstrated any understanding of the implications of its aspirations as was abundantly clear at the Northern Gateway. It was unable to make any forecast of employment generation for that development. It was also unable to respond to requests to reconcile the consultant-produced high levels of employment generation assumed by the SHMA with the much lower levels used in traffic forecasting. This demonstrates the need for independent strategic planning across Oxfordshire. (cont...)</p>
PR-A-056	Kidlington Development Watch	3	<p>(cont...) The City Council and the Oxfordshire Councils generally should be seeking to find ways of diverting growth away from the city of Oxford both (1) across the County and (2) beyond to areas of the country with both need and can accommodate growth. Within the county, Oxford Brookes University could be gradually located to Bicester. This would both benefit Bicester, the University and Oxford. Beyond the county, Oxfordshire should consider economic twinning with specific locations in regions which would particularly benefit from growth. This is now more feasible than ever with the availability of high speed internet links.</p>
PR-A-056	Kidlington Development Watch	6	<p>No. Firstly we do not accept the underlying premise that there is an additional need. Secondly, we believe that growth in general should be directed away from Oxford within and beyond the County as outlined in our response to Question 3.</p>
PR-A-056	Kidlington Development Watch	9	<p>No. Planning guidance states that permanence is a key characteristic of the Green Belt. It also makes clear that housing and economic needs do not override constraints on the use of land, such as Green Belt. It states that this may mean that an authority is in fact unable to meet its ‘objectively assessed needs’. Cherwell appears to have made no attempt to take into account the effect of the Green Belt (and other constraints) on its ability to provide for ‘objectively assessed need’. (And, as we have pointed out above the figure it is using for “objectively assessed need” is no such thing and is highly exaggerated). The Review of the Local Plan provides an opportunity to put right these deficiencies.</p> <p>Green Belt is much valued by local residents, makes an important contribution to the areas natural capital, and should be improved as an asset in its own right and not built upon.</p> <p>The Government, through its manifesto, is committed to protect the Green Belt. (cont...)</p>

PR-A-056	Kidlington Development Watch	9	<p>(cont...) Paragraph B253 of the Cherwell Local Plan says "The Oxford Green Belt was designated to restrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area." We support this statement strongly. Planning policy should therefore seek to direct development away from the city, both within and beyond the county boundaries.</p> <p>The recent Green Belt study is therefore wrong to ignore the fact that all land parcels within the GB contribute to the over-riding purpose (in the case of Oxford and similar historic cities) of preserving the setting and character of Oxford. (The study only considers the setting, not the damage to the character of the city resulting from increased activity). Despite this, even under its (highly subjective) assessments, all Green Belt land parcels in Cherwell contribute to the purposes of the Green Belt, therefore justifying its original designation.</p>
PR-A-056	Kidlington Development Watch	16	<p>Transport networks around Oxford are already over-capacity. Oxfordshire County Council's statements quoted in your document are bland and vague aspirations. The actual schemes currently proposed will not even solve existing problems. The additional developments proposed (including the 3500 homes) will make matters much worse while the forecasts apparently being used do not inspire any confidence. For example it became clear at the Northern Gateway EIP that the high figures were being used for employment generation, and then translated into high forecasts of housing need, while very much lower figures were being used for forecasting travel demand. Again this review presents an opportunity to re-visit these inconsistent and excessive forecasts and scale back the level of proposed development.</p>
PR-A-056	Kidlington Development Watch	24	<p>Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will further damage the natural environment of Cherwell and its natural capital, of which the Green Belt is a major component. It is likely that by providing for numbers in excess of what is likely to be built, the District will soon lose its ability to demonstrate a 5 year housing land supply, thereby allowing to developers to build on the most unsuitable sites both from natural environment and general sustainability perspectives.</p>
PR-A-056	Kidlington Development Watch	1	<p>Firstly, we would like to express our serious concern about the nature of the consultation. You are running several consultations concurrently with about 30 separate documents on your website. Many of the documents are lengthy and difficult to follow and it is very difficult to distinguish between them and understand their purposes. It seems to us that this will deter members of the public from responding, although no doubt developers, landowners and their consultants wishing to promote individual sites will be only too keen to respond. This renders the idea that this is an open public consultation a largely meaningless sham.</p> <p>Since Oxford City has yet to produce a Local Plan the consultation is premature. The putative division of housing across the neighbouring counties is crude. It would be better to assess capacity based on sound planning and infrastructure considerations backed by evidence of actual need. It would be preferable to defer any assessment of additional housing requirements based on actual need.</p> <p>Ironically, the quantity of material you have provided for consultation is in sharp contrast to the total lack of consultation on the Oxfordshire SHMA and its subjective, biased and highly exaggerated estimate of Oxford's housing need. Yet it is this document and its single figure of 100,000 houses which is the reason for your consultation on the Partial Review and to which all your consultation questions are subordinate</p>

PR-A-057 Oxford City Council	1	<p>The City Council agrees with para. 2.8, that it should seek to meet its OAN as fully as it can. This is reflected in the approach agreed by Growth Board (20 Nov 2014) which agreed the need for a robust assessment of Oxford's capacity to deliver housing for the period to 2031, with a critical friend and check and challenge process built in.</p> <p>The City Council therefore commissioned independent consultancy URS (now Aecom) to work with in producing a new Oxford SHLAA, published Dec 2014, indicating a capacity to deliver 10,212 homes in period 2011-31. Following a thorough check & challenge process, including consideration of a 'challenge' report commissioned by Cherwell, South & Vale, this figure was updated to 10,368 in May 2015.</p> <p>An independent Critical Friend, Fortismere Associates, concluded that the City Council's approach to assessing housing supply is compliant with government policy and guidance in the NPPF and PPG. The report did not find that there were any further sites that should have been assessed as suitable and deliverable, albeit there was scope to further test housing densities whilst still meeting other important plan objectives. In November 2015 the Oxfordshire Growth Board agreed a working assumption of 15,000 homes as the basis for planning for providing housing for Oxford outside its administrative boundary. The City Council agrees that this should be taken forward in the partial review process as a working assumption. (cont...)</p>
PR-A-057 Oxford City Council	1	<p>(cont....) However it is unlikely that a precise figure for Oxford's unmet need will ever be fully agreed, as there will always be different views as to the quantum of housing considered to be deliverable and achievable in Oxford. This reflects that in a constrained area such as Oxford where most housing comes from small sites and recycled land, the housing supply trajectory will fluctuate constantly. The Oxford housing target will always therefore be a floor not a ceiling. Whilst the City Council will continue to maximise its housing beyond the adopted housing target, the target must be based on a realistic assessment of housing potential within a constrained urban area with very limited land supply. Any unmet need beyond the Oxford housing target will need to be planned for in the neighbouring authority areas, reflecting the Government's and local priority to boost housing supply.</p> <p>The joint County-wide process for apportionment is due to conclude by September 2016. At this point, Cherwell (and the other districts) will have an apportioned number to incorporate into its plan review. Even if, due to timetable slippage, there were no apportionment agreed by September, in Summer 2016 the jointly prepared evidence should allow a reasonable degree of precision and steer to identify strategic sites for meeting Oxford's unmet need. (cont...)</p>
PR-A-057 Oxford City Council	1	<p>(cont....) Therefore the City Council considers that 3,500 (para 2.17) is a minimum and should be considered only as an intermediate working assumption pending the outcome of on-going the joint work. To commit to this figure now would pre-empt the outcome of the joint work, given that the joint work is within months of concluding. In the City Council's view, the final apportionment figure is likely to be higher than 3,500.</p> <p>Work undertaken by Oxford City Council with an expert consultant has identified that land to the immediate north of Oxford has capacity to sustainably deliver some 2,800 - 3,600 homes, and furthermore that this would be one of the two most sustainable locations for housing development compared with other alternatives. Together with further possibilities, for example stated landowner intentions to deliver homes at Begbroke (likely to be in the region of 1,500 - 2,000 homes), this would indicate that within a range of 4,300 - 5,600 additional homes, sustainably located to meet Oxford's needs, could be an achievable scenario. This is in the context of expectation that the joint work being separately undertaken will lead to an evidence-led apportionment to be agreed across the Oxfordshire authorities.</p>

PR-A-057 Oxford City Council	2	<p>The City Council welcomes that there is a clear shared ambition across the Oxfordshire authorities to accelerate economic growth in the County, particularly focused on the knowledge spine Bicester-Oxford-Science Vale. The NPPF (paras. 20 & 21) explains that local authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century; and should plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology clusters. Oxford's status as a world-class University city, and the lack of land supply within the City boundaries, mean that there continues to be demand for research and development space within or close to the City necessary to maintain Oxford's special status long term.</p> <p>However, over-provision of employment uses would create significant further pressure on the housing stock and therefore require a greater level of housing growth than currently planned for. The City Council is only therefore likely to support provision of further employment that is either ancillary to the housing already being planned for (i.e. supports the principles of sustainable mixed-use development), or responds to a specific need arising from one of Oxford's key sectors.</p>
PR-A-057 Oxford City Council	3	<p>The City Council welcomes that some of Oxford's key issues have been identified (paras 2.23 – 2.26). We would add the following key points:</p> <ul style="list-style-type: none"> - The single greatest physical issue is movement into and around the City. Around 50% of jobs in Oxford are taken by people living outside of Oxford. Despite recent and ongoing improvements to the road network, the magnitude of existing pressure on the network, combined with the future pressure arising from housing and employment growth, makes it imperative to locate growth sustainably, in a way that maximises sustainable travel modes such as walking, cycling and public transport, and reduces the need for Oxford workers to commute long distances. This principle also reflects the overall thrust of the Oxford Transport Strategy and the Local Transport Plan. - By building on high levels of cycling, walking and bus use in Oxford, delivery of strategic housing sites to meet Oxford's need presents a great opportunity to improve sustainable transport infrastructure such as investment in high-quality public transport corridors and, assuming proximity to Oxford, cycle super-highways. (cont...)
PR-A-057 Oxford City Council	3	<p>(cont...) - The City is witnessing severe difficulty in the recruitment and the retention of staff at all levels, because of a lack of housing choice and affordability. The Oxford universities and key public services, such as health and education, are severely compromised through the lack of available affordable housing for key staff. There is also a severe impact on individuals and families resulting from the lack of affordability, such as overcrowding, homelessness and poor living conditions. It is important for the new housing to provide a very wide mix of tenures and house types.</p> <ul style="list-style-type: none"> - The quality and design of new growth in and around Oxford is key. With a high benchmark having been set by Barton Park and other Oxford developments, there is an expectation that the new housing will create distinctive, exemplar high quality new neighbourhoods for Oxford that include all necessary community and social infrastructure to deliver high quality place-making. - Oxford aims to be a Low-carbon City. New development should aspire to be zero-carbon. Low carbon technologies such as district heating, ground-source heat pumps, photovoltaics, and electric charging points for vehicles should be incorporated in the new Oxford communities.
PR-A-057 Oxford City Council	4	<p>The overriding principle should be to make a significant contribution to Oxford's unmet housing need, in a manner that maximises sustainable and affordable travel. Key principles and goals should look beyond the plan period (2031) as the need from Oxford (as well as Cherwell) is likely to continue well beyond then. Suggestions for Plan objectives, which will also be tested against Sustainability Appraisal objectives, are:</p> <ul style="list-style-type: none"> - Maximise the sustainable provision of housing towards meeting the existing and future objectively assessed housing needs of Oxford (reflecting the significant and ongoing constraints to development within Oxford itself); - Provide significant affordable housing and key worker housing which respond to local circumstances; - Reduce the need to travel; - Maximise convenient access to the whole of Oxford by walking, cycling and low-cost public transport; - Create distinctive, high quality new neighbourhoods for Oxford of national exemplar quality; (cont...)

PR-A-057	Oxford City Council	4	<p>(cont...) Create mixed and balanced communities, providing for a range of household types and income levels;</p> <ul style="list-style-type: none"> - Ensure that future development relating to Oxford is physically and socially integrated with Oxford's existing communities; - Provide social and physical infrastructure to meet local community needs; - Minimise the use of non-renewable resources; - Make efficient use of land; - Ensure excellent design and masterplanning; - Minimise impact on landscape, and seek to enhance the surrounding environment; - Maintain, enhance and protect biodiversity.
PR-A-057	Oxford City Council	5	<p>A further key requirement of the Plan (albeit more process rather than a Plan objective) is for the housing to be The City Council suggests a focussed vision along the lines of the following:</p> <ul style="list-style-type: none"> - To provide new balanced communities that form part of Oxford, of exemplar design; provide for a range of household types and incomes reflecting Oxford's diverse needs; and support the City's world-class economy and universities by ensuring people have convenient, affordable and sustainable travel opportunities to their Oxford places of work and study.
PR-A-057	Oxford City Council	6	<p>It is essential to relate the area of search to Oxford, for the reasons already stated. This should reflect both physical proximity, and accessibility by sustainable transport modes.</p>
PR-A-057	Oxford City Council	7	<p>The City Council broadly supports the factors listed in para 4.8 except for the last two ('geographical area covered by the Oxford Green Belt', and 'the Cherwell settlement hierarchy').</p> <p>The area of search should not be overly prescriptive as ultimately, the closer to Oxford the housing can be provided, whilst taking into account any major physical barriers, the more likely it is to meet the unmet need of the City in a sustainable manner. It must very clearly take into account accessibility to Oxford as a whole: public transport is important, but equally access by cycling, walking, or a combination of these sustainable modes should be considered. This should be in the context of overall travel time from origin to a number of Oxford destinations (but particularly to key areas of economic activity).</p> <p>It would not be appropriate to define the area of search simply using one destination point such as the City centre. Future occupants will need good, convenient access to as much of the City as possible, particularly areas such as Headington and the Eastern Arc where much of the economic activity lies.</p>
PR-A-057	Oxford City Council	8	<p>No. Much of the wider district has little functional relationship with Oxford and would allow consideration of unsustainable options for growth, which would not meet un-met needs from Oxford. Rather they would likely exacerbate existing unsustainable commuting patterns, such as congestion on the A34 and primary routes into North Oxford.</p>
PR-A-057	Oxford City Council	9	<p>The Oxford Green Belt was created primarily for a specific purpose: to preserve the historic setting of the City. It would be somewhat arbitrary to use the Green Belt boundary as a proxy for an area of search for new housing for Oxford, as the factors relevant to sustainably locating Oxford housing growth are not equivalent to why the Green Belt boundaries were drawn where they were.</p> <p>However the application of proximity and transport link tests makes it highly likely that the most appropriate sites are primarily within the area delimited by the outer edge of the Green Belt. Therefore the City Council strongly supports that the partial review is to consider a Green Belt boundary review. There are clear exceptional circumstances to justify a strategic review of Green Belt boundaries. In the City Council's view this should be done to enable a well-planned urban extension to the north of Oxford. The loss of Green Belt in this location would be minimal – well under 1% of the total area of the Green Belt in Oxfordshire.</p>

PR-A-057 Oxford City Council	14	<p>The City Council has outlined its key objectives in the answers to earlier questions. Please refer to our response to questions 4 and 5 in particular. The key aim is to provide housing development of exemplar design which integrates well with Oxford, by ensuring convenient sustainable access to the whole of Oxford; create a mixed and balanced housing offer including significant provision of affordable housing, and ensure low-carbon technologies are incorporated.</p> <p>Other more detailed objectives should include:</p> <ul style="list-style-type: none"> - Aiming for all housing to meet Category 2 of the Building Regulations Part M (Access to and Use of Buildings), with a proportion to meet Category 3 (wheelchair accessible or adaptable dwellings); - Comply with the National Space Standards for internal space within dwellings; - Include provision for super-fast broadband; - Include provision for vehicle electric charging points for all new dwellings where parking is provided.
PR-A-057 Oxford City Council	15	<p>As outlined earlier in this response, the City Council has provided compelling evidence to suggest that an urban extension to the immediate north of Oxford would offer a highly sustainable location for housing-led development to help meet Oxford's unmet housing needs. The location is highly accessible to various locations in Oxford by public transport, walking and cycling, and is adjacent to Oxford Parkway station on the main Chiltern Railways line linking to central Oxford (from December 2017), Bicester, High Wycombe and London Marylebone. There are excellent opportunities to integrate communities in this location with existing Oxford communities, whilst also providing for all necessary local community and social infrastructure, and to create new neighbourhoods of exemplar and distinctive design. The City Council's work has shown that there is capacity for some 2,800-3,600 houses in this location. Please see the enclosed Turley Route Map suite of documents for a comprehensive evidence base supporting this option. (cont...)</p>
PR-A-057 Oxford City Council	15	<p>(cont...) The City Council would not support spatial options that locate the new housing where access to Oxford is inconvenient by sustainable means, or would encourage further car travel to destinations in Oxford for a significant part of the journey. Therefore additional sites in more remote locations such as Bicester, Banbury or Upper Heyford would not be supported.</p> <p>In common with objectives suggested earlier in this response, the following factors should be taken into account:</p> <ul style="list-style-type: none"> - Be located as close as possible to Oxford; - Capitalise on existing and future readily achievable sustainable transport links, in particular which provide for active modes i.e. walking and cycling to Oxford destinations, but also high frequency public transport links; - Ensure as far as possible that convenient access can be achieved to a range of transport destinations in Oxford, not just one area such as the City centre; - In particular, seek to ensure good transport links to economic activity hotspots (the City centre/Oxford West End, but also Headington, and as far as possible Cowley and Littlemore areas (the Eastern Arc); - A hierarchical approach to location: physical proximity (for cycling/walking), then focus along high frequency public transport corridors to multiple Oxford destinations.

PR-A-057 Oxford City Council	18	<p>The City Council welcomes that there are dovetailing objectives for providing infrastructure in both Cherwell and Oxford Local Plans. It is clear common ground that appropriate social and physical infrastructure should be provided as part of meeting the unmet need.</p> <p>Opportunities for making efficient use of existing infrastructure is essential (see our response to question 19 below). However it is equally important that new development should be of a scale to provide for its own local needs such as schools, GPs and green infrastructure. Any spread of smaller development sites as a means of addressing Oxford's unmet need would be inappropriate, as it would be difficult to deliver new schools, health facilities etc. on a scale necessary to mitigate the additional pressure on existing facilities and services.</p> <p>As well as education, health and community infrastructure, there should also be a strong policy steer on green infrastructure. The Oxford Sites and Housing Plan requires a minimum 10% public open space on strategic housing sites. Other types of on-site infrastructure must also be addressed at an early stage of plan-making, e.g. drainage, water supply and energy connections.</p>
PR-A-057 Oxford City Council	19	<p>The City Council believes that the range of employment opportunities, community facilities and services in Oxford provide the best opportunity to mitigate the gaps in infrastructure as growth comes forward. As the highest order settlement in Oxfordshire, Oxford provides the best choice of social and community infrastructure, as well as numerous leisure, retail and sports facilities. These should be considered as a strong positive factor in considering the options for growth.</p> <p>The enclosed Turley Associates report Appendices includes as Appendix 2 (page 162) a spatial assessment of social and community infrastructure in the north of Oxford area. This indicates that new development in this location would have a good range of existing local services to choose from. The Pro-forma Analysis of Options also identifies a number of existing social infrastructure provisions in both North Oxford and Kidlington would provide additional choice for new residents of strategic housing in this area.</p> <p>Turley Associates has also provided a Delivery Statement for the North of Oxford prospective area for development that concludes the development would be viable with the cost of on-site infrastructure requirements factored in.</p>
PR-A-057 Oxford City Council	20	<p>The City Council welcomes the summary of issues in paragraphs 5.100 to 5.107 relating to the Oxford economic context. It would be helpful to identify some particular additional issues in the Oxford context.</p> <p>Firstly, the lack of housing affordable to workers in Oxford is recognised as a significant drag on the economic development of the City, and also on the Oxfordshire economy more generally. There is a serious issue of recruitment and retention becoming difficult across most sectors due to the housing crisis. This is an increasing problem particularly in key public services such as hospitals and schools, for whom many employees even on moderate wages cannot afford to live in or near the City and are therefore finding jobs elsewhere. Furthermore, the two universities and associated research industries are equally reporting difficulties in recruitment to key Oxford-based research posts. (cont...)</p>
PR-A-057 Oxford City Council	20	<p>(cont...) Secondly, it should be recognised that as well as being the economic centre of the County, the Oxford economy is of national and worldwide significance, principally due to the presence of the universities, research hospitals and associated industries. This is recognised in the Strategic Economic Plan, which highlights Oxford as a key area where continued investment is required to realise the full potential of its world-class education, research and innovation that will underpin this economic growth. It would also be helpful to explicitly recognise that planned economic growth in Oxford is projected to result in some 24,000 jobs over the period 2011-2031.</p> <p>Thirdly, the diversity of employment types in Oxford should be more clearly recognised. Major employers of blue-collar workers include BMW and Unipart, and there are numerous other companies offering more manual-based types of work. These workers provide valuable services for the well-being of the City, but are also suffering the effects of the housing crisis and congestion on the transport network.</p>

PR-A-057	Oxford City Council	21	<p>Locating significant new housing close to Oxford is vitally important to support Oxford's long-term economic well-being. There is growing evidence that Oxford is beginning to slip behind other comparable cities' attractiveness for economic development, for example Cambridge.</p> <p>It is also vitally important to improve access for workers at hospitals, schools, universities to get to their workplaces conveniently and cheaply, in order to sustain the world-class clinical and research activities that help to drive the Oxfordshire economy and benefit Oxfordshire's communities, in relation to health care and educational opportunities.</p> <p>Locating new housing immediately north of Oxford would support significant proposed economic growth at Northern Gateway, Begbroke Science Park, Kidlington Business Park and Oxford Airport. This would be of benefit to both Cherwell's and Oxford's spatial strategies.</p>
PR-A-057	Oxford City Council	22	<p>The City Council welcomes that the Issues document recognises the framework and context set in relation to its ambitions and achievements towards being a low-carbon City. As well as the policy context highlighted in the paper, it should also be noted that Oxford has adopted a Low Emissions Strategy and a Carbon Management Strategy. The latter has a headline target of aiming to achieve a 5% year-on-year reduction in carbon dioxide emissions for the period 2012-2017.</p> <p>As a factual correction, note that the most recent policy on low carbon relating to residential development is included in the Sites & Housing Plan which requires 20% of energy requirement on site to be from renewables and low carbon sources. We would want this standard to apply to the Oxford related housing.</p>
PR-A-057	Oxford City Council	23	<p>As explained earlier in this response, it is crucial that the new housing to meet Oxford's unmet need is spatially closely related to the main built-up area of Oxford. The City Council's view is that a sustainable urban extension to Oxford is a far more sustainable option for meeting the need than stand-alone settlements, or development adjoining smaller settlements, as it offers the greatest opportunity for sustainable modes of travel.</p>
PR-A-057	Oxford City Council	24	<p>The City Council welcomes recognition of the importance of the Oxford Meadows SAC. It should also be noted that the Oxford Core Strategy and other Oxford Local Plan policies provide for the protection and enhancement of biodiversity and the natural environment (see Core Strategy Spatial Objectives and Policy CS12). We would encourage that these same principles are applied to the new housing being planned for.</p> <p>As a point of factual accuracy, it should be noted that the Green Belt is not a natural environment constraint but relates to the setting of historic Oxford. See comments under Q26.</p>
PR-A-057	Oxford City Council	25	<p>The City Council notes that the SAC and flood plain present significant constraints in some areas to the north of Oxford, however there is also much land outside the flood zone.</p> <p>The SAC is currently compromised by A34 traffic. Whilst a detailed Habitats Regulations Assessment will be necessary, it is likely that housing close to Oxford could help alleviate this when compared with other alternatives more likely to generate additional traffic on the A34.</p> <p>We would further note that options for growth in the more rural areas away from Oxford are likely to have a greater impact on the character of the open countryside.</p>
PR-A-057	Oxford City Council	28	<p>Site submission - Land North of Oxford</p>

PR-A-057 Oxford City Council 10+11

The City Council supports identifying a specific housing supply identified for Oxford to be provided in Cherwell. This must be limited to the geographical area of search identified as having a strong spatial relationship with Oxford.

Market indications are that there is strong pent-up demand for sites close to Oxford. Further drivers are planned jobs growth at sites immediately north of the built-up Oxford area such as Begbroke and Northern Gateway. Sites close to Oxford therefore have good prospect of being delivered within the Plan period. If such sites are the most sustainable and suitable, there is no reason why the housing should not be delivered as quickly (or quicker) than housing elsewhere in Cherwell District.

Furthermore, Cherwell's Spatial Strategy is to focus development elsewhere in the District around Bicester and Banbury in line with planned and existing employment growth in those locations; the Local Plan Part 1 was adopted on this basis. Therefore additional housing to meet the needs of Oxford will be complementary to housing being built to meet the needs and market demands elsewhere in the district.

PR-A-057 Oxford City Council 12+13

The City Council supports recognition of the housing issues in Oxford as reported in the SHMA (Box 5).

It would be helpful to more fully recognise the severity and long-standing nature of the affordable housing crisis in Oxford, and the impact this has on the local economy. See introduction to this response letter.

The issues should also include recognition that the presence of the Universities, and various 'spin-off' tutorial colleges and language schools, is also a significant driver of housing demand in the City, therefore the mix of housing will need to cater for students and key workers at the Universities and colleges.

The objective of avoiding 'sprawl' and the harm to identity of settlements (5.37) is broadly supported, within the meaning of avoiding unplanned or badly-planned development in the open countryside. However the term 'sprawl' in itself is ambiguous and should be avoided, given that well-planned extensions to settlements can be designed to cause minimal impact on, and potential enhancement to, the setting of affected settlements. (cont...)

PR-A-057 Oxford City Council 12+13

(cont...) There should be recognition of the expectation that the new housing will create distinctive, exemplar high quality new neighbourhoods which successfully integrate with Oxford, that include all necessary community and social infrastructure. It could be highlighted that both the City Council and Cherwell share an aspiration for housing development to be of national, or even international, exemplar quality.

The Plan objectives should mitigate the impacts of new greenfield development through efficient use of land, and good design and masterplanning. This can be achieved through the adoption of design codes alongside strategic allocations, which can positively reinforce community cohesion and identity (for both existing and new communities), including where physical or visual gaps between settlements are reduced.

PR-A-057 Oxford City Council 16+17

The City Council's views on principles relating to transport and movement issues are set out in our responses to earlier questions. Overall, proximity to Oxford is key to ensuring deliverability in transport terms. This is because Oxford has exceptionally high levels of sustainable transport mode share, including amongst the highest mode share for cycling in the country, and a highly developed bus network. There are high frequency bus corridors into Oxford from Cherwell, particularly the route connecting Kidlington and Oxford centre via Oxford Parkway station. The existing infrastructure and availability of public transport in the area immediately surrounding Oxford gives much better prospects for acceptability and deliverability in transport terms, compared with more remote locations where transport mitigation would be far more costly and would do less to encourage private car use for travel into Oxford and elsewhere.

The City Council broadly support the County Council's vision for transport in and to Oxford, although we have made comments on some of the detail within the OTS and LTP4. It is important to note that, at the current time, there is uncertainty over the timing of delivery of the proposed Bus Rapid Transit system and proposed new Park and Ride sites. Hence there should not be sole reliance on these coming forward. (cont...)

PR-A-057 Oxford City Council 16+17

(cont...) The City Council considers that the existing City Park & Ride sites will be needed in the long term, together with additional 'outer ring' Park and Ride sites to help address the additional trips arising from housing growth in Oxfordshire. Existing and proposed sites could link with 'Bus Rapid Transit' (BRT) services as these are developed in future. However, even if and when the Bus Rapid Transit system is completed, it is unlikely to substitute for the need for housing located close to Oxford, as some cross-city journeys will still take significant time and require changing buses. Also the time to develop BRT is likely to go beyond the 2031 Plan period, and due to funding uncertainties, some parts of it may not be realised at all. BRT also provides limited opportunity for cycling and walking as the main mode.

As well as the potential increase in trips within the City boundary, of equal concern is the continuing trend of more in-commuting trips into Oxford as a result of Green Belt 'leap-frogging' due to the lack of housing supply in and around Oxford. The figure on page 47 of the Issues paper shows how there are well over 8,000 journeys to work made each day from Cherwell to Oxford, and this has increased between 2001-2011. This contributes to congestion on the A34 in particular, which is known to be one of the most congested parts of the strategic road network in the UK. (cont...)

PR-A-057 Oxford City Council 16+17

(cont...) The enclosed Peter Brett Associates report "Transport Overview and Assessment of Site Options" (Appendix 3 of the Advocacy Statement Appendices, page 169) gives a full analysis of the pattern of travel associated with Oxford, and describes the opportunities to mitigate the impact of future growth by locating housing development close to Oxford in future. The enclosed Peter Brett Associates Report "North & South Oxford Growth Options: Transport Appraisal" (Appendix 6 of the Advocacy Statement Appendices, page 378) provides evidence that with appropriate mitigation measures, strategic housing development north of Oxford is deliverable in transport terms. Turley Associates has provided a Delivery Statement that concludes the development would be viable with the cost of transport mitigation factored in.

PR-A-057 Oxford City Council 26+27

The key issue for Oxford is the protection and enhancement of the historic setting of the City. This is particularly relevant to areas of open countryside around Oxford that form part of the green backdrop to the historic core of the City. The recognition of the importance of the 'green wedges' or 'green lungs' into Oxford are noted and welcomed.

The joint Oxford Green Belt Study prepared by Land Use Consultants on behalf of all the Oxfordshire districts is relevant in this respect. It highlights that irrespective of the performance of particular Green Belt parcels, a key consideration is whether exceptional circumstances exist that outweigh the Green Belt designation. Previously adopted development plans, such as the former South East Plan, have on review of the evidence found that exceptional circumstances do indeed exist which necessitate a review of the inner Oxford Green Belt boundaries. (cont...)

PR-A-057	Oxford City Council	26+27	<p>The City Council would therefore urge consideration of growth options within the Green Belt which take into account the likely impacts on Green Belt purposes, but also consider the exceptional circumstances that exist which justify a review of the Green Belt boundary. The detailed commentary within the LUC Green Belt Study, as well as work done by Turley Associates on behalf of the City Council (Landscape & Visual Impact Assessment – see Turley Associates Report Appendices - Appendix 1, page 72) will assist in balancing the need for sustainably located housing for Oxford against the important aim of maintaining the overall integrity of the Green Belt.</p>
PR-A-057	Oxford City Council	General	<p>The City Council trusts that our comments will be helpful, and we look forward to continued positive engagement in respect of this Partial Review as well as in relation to the joint work of the Growth Board. Please note that we will be submitting a separate form under the 'Call for Sites' exercise currently being undertaken in relation to the area north of Oxford.</p>
PR-A-058	Natural England	9&24	<p>Natural England welcomes the opportunity to look at and ensure that our remit is being covered appropriately within these partial review documents. It would appear that with the documentation provided that the correct areas have been identified and suggested for inclusion within the main assessment going forward. Ensuring that Oxford City is able to meet its unmet housing need is a key issue for this area and will need to be worked on in cooperation with the other Oxfordshire authorities as highlighted in this document.</p> <p>It should be ensured that any additional housing to be accounted for on behalf of Oxford (potentially around 3,500 dwellings) can be accommodated without impacting upon the Cotswolds Area of Outstanding Natural Beauty (AONB) in the north west of Cherwell. The review of greenbelt land around Oxford could well highlight areas nearer the city that can be used for additional housing in Cherwell's southern extent. This shouldn't however allow for an intrusion of new housing into greenbelt land where it would be using best and most versatile soils that fall into the Agricultural Land Classification bands 1-3a (inclusive). (cont...)</p>
PR-A-058	Natural England		<p>9 (cont...) Survey work will need to be carried out in order to assess whether any allocations put forward that might be within existing greenbelt land are in fact viable options for development in order to be in line with National Planning Policy Framework (NPPF) paragraph 112:</p> <p>"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality".</p> <p>In terms of the search area for the Oxford housing needs review the area shouldn't be narrowed too far in order to allow for consideration of the entire area nearer Oxford even if large parts of it can then be discounted given their propensity to flood or present green belt status.</p> <p>Within the Part 2 issues consultation the questions around HGVs and Transport mitigation and monitoring, it would be beneficial to see areas highlighted that are at risk of being adversely affected by HGV movements and also to ensure that effective mitigation is proposed and properly monitored so as to allow for effective controls on development. In terms of securing and demonstrating net biodiversity gain on site (in paragraph 4.236) this should be expanded as suggested in order to give developers a very good idea of the sorts of things they can implement in order to ensure a gain is seen with all development.</p>
PR-A-058	Natural England		<p>Natural England welcomes the recognition of a number of sustainability issues in the scoping report for the Local Plan review parts 1 and 2. The areas which are highlighted as being of importance and which will be covered are those which Natural England would wish to see under our remit. Given that there are areas at considerable risk of flooding in the southern part of Cherwell, between Kidlington and Bicester (as identified in Figure 3.6 of the SA for the Issues Consultation) this will need to be a factor considered early on for any sites suggested in that area.</p>

PR-A-059	Pegasus Group / The Dorchester Group	1	<p>At present there is a lack of evidence to demonstrate whether or not 3,500 additional homes represents an appropriate scale of development that should be accommodated within the Cherwell District. It is understood that the final figure will not be known until the Oxfordshire Growth Board presents its findings in the summer of 2016.</p> <p>The starting point must be that the District has an adopted Local Plan which sets out the need for housing and seeks to provide for 22,840 homes over the Plan period from 2011- 2031. This equates to 1,140 dwellings per year over the 20 year plan period. This represents a significant increase from that originally proposed in the submitted Local Plan which sought to provide housing at a rate equivalent of 670 homes per year, or 16,750 over the plan period to 2031. This significant increase was justified on the basis of the conclusions of the 2014 SHMA. (cont...)</p>
PR-A-059	Pegasus Group / The Dorchester Group	1	<p>(cont...) Therefore in order to ensure soundness total housing provision proposed in the LP1 has already been increased by circa 36% from that originally proposed. The resultant annual average completion rate necessary to meet this uplift in housing amounts to a 124% increase when compared against actual completions recorded annually over the five year period preceding the start of the LP1 Plan period (i.e. 2006-2011 – average annual completions = 509dpa). Total completions over the period 2006-2015 for the district amount to 4,594 dwellings, equating to actual completion rates of 510 dwellings per annum over that 9 year period.</p> <p>The extent to which the Cherwell District will be expected to accommodate unmet need arising from Oxford City must be seen in the context of the very significant increase in housing already necessary to ensure the district can meet its own housing requirements. The first priority for the District Council must be to ensure that it meets in full housing need for the district identified in the LP1.</p>
PR-A-059	Pegasus Group / The Dorchester Group	2	<p>Question 2 considers whether additional employment generating development should be provided alongside any additional housing required in response to identified unmet need. The adopted LP1 housing requirements reflects the 2014 SHMA which in itself was informed by economic considerations, the result of which was to identify a housing requirement for the district that integrates strategies for housing and employment.</p> <p>The “Issues” consultation document does not provide any details as to the overall quantum of employment land that would be sought, even against the working assumption of 3,500 additional homes. Reference is made at paragraph 2.21 of the “Issues” document that the major economic drivers in Oxfordshire include its concentration of high-tech and research technologies, such sectors reflect aspirations within the adopted Cherwell Local Plan so in principle such additional employment generating uses would be supported. The former RAF Upper Heyford and its existing employment base is entirely consistent with such drivers. (cont...)</p>
PR-A-059	Pegasus Group / The Dorchester Group	2	<p>(cont...) Unmet need arising from Oxford City relates specifically to the economic projections that supported the SHMA and the forecasts for economic development at Oxford City. Where housing cannot be provided within Oxford City the concern will be there it will result in a disconnect between the economic projections for Oxford, specifically in terms of the potential to dislocate the physical relationship in terms of location of future employment generating uses and new homes over the Plan period.</p> <p>Additional employment generating uses associated with providing for additional housing must therefore ensure that they are consistent with the economic objectives, priorities established for Oxford and critically, that it does not undermine the economic base and associated strategies and objectives for Cherwell as established in the adopted Local Plan. The Former RAF Upper Heyford site represents the only strategic employment location outside of the main towns of Banbury and Bicester in Cherwell and Policy Villages 5 seeks to facilitate the delivery of an additional 1,500 jobs at this established strategic employment site. Significant employment generating development proposed through the partial review of the Local Plan must first ensure that such proposals do not dilute the value of existing employment provision and to consider opportunities to enhance existing provision within the district, where the sectors / objectives are consistent with those identified areas of growth.</p>

PR-A-059 Pegasus Group /
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Questions 6 to 9 deal specifically with how unmet need could be accommodated, providing two options. The first being a geographically defined area within which additional development would be directed, i.e. an 'Area of Search', with the second option being that the district as a whole accommodates additional growth under the Duty to Cooperate.

A district-wide approach would not be supported. The Cherwell Local Plan Part 1 has established the housing need for the district to 2031 which, as set out previously, requires a significant and challenging uplift in housing delivery when compared with historic rates of delivery. To apply the district-wide approach effectively increases the Local Plan Part 1 requirement still further, to levels which are unlikely to be achievable within the current spatial strategy established in the adopted Local Plan. The consequence of which will be to put all settlements, at every tier in the settlement hierarchy at risk from speculative development, premised on the need to respond to Oxford City's unmet need, which will undermine the Local Plan's spatial strategy. (cont...)

PR-A-059 Pegasus Group /
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(cont...) An 'Area of Search' approach would provide a more pragmatic and manageable solution to unmet need arising from Oxford City. It will provide certainty as to those areas of the district that will be subject to additional development pressures and can be identified so that the established spatial strategy set out in the adopted Local Plan is preserved by, for example, focusing development in locations where appropriate infrastructure is in place or can be provided to mitigate the impact of additional development. It may well be the case that multiple Areas of Search are identified, responding to appropriate development opportunities, such as where existing brownfield land could be utilised or where additional development, housing and/or employment, would support/reinforce the role of specific settlements and/or established employment centres.

The former RAF Upper Heyford Site is an established and growing new community that represents the main strategic location for housing and employment outside of the main towns. Significant levels of development are provided for within the adopted Local Plan, supported by an increase in employment through the creation of an additional 1,500 new jobs over the Plan period. The LDA Masterplanning exercise is set within the parameters of the quantitative provisions of Policy Villages 5, it does not attempt to consider the extent to which this important brownfield resource could contribute to meeting Oxford's unmet needs. Notwithstanding this, the LDA Masterplanning is considered important as it gives effect to requirements of Policy Villages 5 and ensures that the first priority of the Council, i.e. meeting its own identified housing needs, can be achieved. (cont...)

PR-A-059 Pegasus Group /
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(cont...) As a large brownfield resource within the district, with strong physical connections to Oxford, with an established employment basis entirely consistent with the high end, highly skilled and innovative employment sectors that form a central component of Oxford City's economic strategy, the Former RAF Upper Heyford site has further potential to make an important contribution to meeting Oxford's unmet need. This is particularly relevant when considered in the wider context of the district where the uplift in housing delivery required at Banbury and Bicester to meet the districts need, is of such a scale that it casts significant doubt on the district's two main towns capacity to make a meaningful contribution to unmet need arising from Oxford. The scale of the uplift in housing required at Banbury and Bicester is illustrated below. (housing completion graphs provided in rep).

The consequence of which is to limit the potential of the district to accommodate unmet need to other strategic locations, i.e. Upper Heyford, and lower tier settlements, or sites located within the Green Belt. It should be recognised that the current Green Belt designation surrounding Oxford and within Cherwell may have an important role in terms accommodating need closest to where it arises and to ensure that there is not a disconnect in terms of the distribution of additional development and the origin of identified need. However, these will be entirely dependent upon a review of the existing Green Belt in order to identify those areas that do not make a positive contribution to the purposes of this designation. Notwithstanding the need for a review of the Green Belt, where it is the case that brownfield sites, of sufficient scale, are available, this must limit the extent to which sites within the Green Belt are required as part of a coherent strategic response to meeting Oxford's unmet need. (cont...)

PR-A-059 Pegasus Group /
The Dorchester
Group

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(cont...) Given the strategic significance of the former RAF Upper Heyford Site it is considered necessary that this large brownfield resource is properly considered in terms of its capacity to accommodate additional development. As a result of strong sales, production levels are being increased such that a delivery rate of 300 per year will be achieved, which is in excess of the housing trajectory envisaged in the adopted Local Plan. The build out rate includes the ability and funding to build out properties for rent as well as sale. The consequence of which is that on this annualised build rate the quantitative provisions of Policy Villages 5 are likely to be met by 2024, with 7 years of the plan period remaining.

The Former RAF Upper Heyford site therefore represents a strategic development location that is attractive to the market and the acceleration in both sales and build-out rates, supports the continued focus of development at this location. With headroom in housing completions, it means that the site will fulfil the Local Plan Part 1 requirements well in advance of the end of the plan period. Therefore, the opportunities for additional development at this brownfield site, as part of a comprehensive strategy, in response to unmet need arising from Oxford, should be considered as a suitable, deliverable and achievable response to the District Council's Duty to Co-operate obligations. (cont...)

PR-A-059 Pegasus Group /
The Dorchester
Group

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(cont...) Additional growth, supported by commensurate improvements to the infrastructure network, to ensure connectivity of the site and its surrounds to the wider area, including Oxford City, will be necessary. This will not only reinforce the sustainability credentials of this brownfield site, but will also have real and tangible knock on benefits to other villages due to improved public transport provision. Improvements which have more urgency and relevance in the context of recent cuts to local services.

Policy Villages 5, the LDA masterplanning and other site specific appraisals are all framed within a quantitative context that does not account for unmet need arising from Oxford City and Cherwell's obligations under the Duty to Cooperate. The delivery of development at this site in response to Policy Villages 5 must be the first priority but it is considered that this should not preclude the consideration of wider opportunities for development. It is recognised that development should not be at any cost and the heritage, ecological and landscape circumstances of the Upper Heyford Site must be taken into account, but these must be set in their appropriate context and reflect their true significance so that appropriate development can be identified and accommodated. The consideration of wider opportunities for development at the Former RAF Upper Heyford site, should not be constrained to the quantitative provisions of Local Plan Policy Villages 5, rather it should be considered in the context of unmet need and the Duty to Cooperate and the development potential of this site and the proven record of delivery.

The Dorchester Group is supportive of, and a member of the Mid-Cherwell Neighbourhood Plan Executive. This designated area represents the largest Neighbourhood Area in the country and although it is at a relatively early stage in its preparation, it represents the collective determination of the Parish Councils to advance a Neighbourhood Plan for the betterment of those communities, within which the Former RAF Upper Heyford site is located. (cont...)

PR-A-059 Pegasus Group /
The Dorchester
Group

6-9

(cont...) As recognised in the NPPG (Para 003. Reference ID: 41-003-20140306), the Neighbourhood Planning process provides the opportunity for communities to set out a positive vision for how they want their community to develop. A central objective of the Mid-Cherwell Neighbourhood Plan will be to identify and promote appropriate scales of development including sites and a strategy for distribution, in response to the quantitative provision set out in the adopted Local Plan. There is collective agreement within the Neighbourhood Plan Forum which endorses the development of brownfield locations in advance of the release of additional greenfield sites. The Upper Heyford site, as an expansive brownfield resource, provides opportunities to support the Neighbourhood Plan in its approach to support the release of brownfield land in order to protect greenfield sites from development. In doing so this also supports the wider objective of protecting and maintaining the intrinsic character of the rural settlements that form the Neighbourhood Plan Area. Such objectives have additional emphasis when considered in the context of Oxford's unmet needs as pressures for development will inevitably increase.

PR-A-059	Pegasus Group / The Dorchester Group	10+11	<p>The first priority for Cherwell District Council must be to ensure that it meets in full its own identified housing needs. It should not be the case that unmet need arising from Oxford City makes the housing land supply requirements for the district more onerous such that the ability to demonstrate a five year housing land supply cannot be achieved.</p> <p>The implications of not having a five year land supply are serious and put all of the settlements across the district at risk from speculative developers and undermines the emphasis on brownfield land ahead of green field sites established in the adopted Local Plan. To some extent this is recognised as an appropriate incentive for Local Plans to ensure that an adequate supply of housing is maintained and we strongly urge the District Council to continue to facilitate appropriate development so that this can be achieved.</p> <p>There should be a clear separation between Cherwell's housing requirements and those additional homes needed in response to Oxford's unmet need. The failure to distinguish between the two elements of housing need will result in a free-for-all across the district, including villages and green field sites adjacent to existing development locations, including the former RAF Upper Heyford. This must be avoided through a clear separation of housing requirements. Cherwell's five year housing land supply obligations must continue to be calculated on the housing requirements for the district as set out in the adopted Local Plan.</p>
PR-A-059	Pegasus Group / The Dorchester Group	N/A(cont.)	<p>It is understood that this consultation is limited to "issues" that relate to the commitment set out in the adopted Local Plan for the District to consider the extent to which it can accommodate unmet need arising from Oxford City. This is necessary in order for the District Council to discharge its obligations under the Duty to Co-operate as set out in the Localism Act 2011.</p> <p>The Duty to Co-operate is not a Duty to Agree but the District Council, through the Oxfordshire Growth Board, has confirmed its commitment to work collectively with Oxfordshire's Councils to consider how any unmet need might be sustainably distributed to the neighbouring districts.</p> <p>To date there is no definitive figure for Oxford's unmet need however, through the Oxfordshire Growth Board a working assumption of 15,000 homes is currently being advanced. Paragraph 2.17 of the Issues consultation document, identifies a figure of an additional 3,500 homes to be provided within the Cherwell District as an appropriate working assumption intended to inform the debate on Cherwell's capacity to accommodate unmet need arising from Oxford City through its obligations under the Duty to Cooperate. (cont...)</p>
PR-A-059	Pegasus Group / The Dorchester Group	N/A(cont)	<p>(cont...) Current role of the Former RAF Upper Heyford- Our comments relate specifically to the Former RAF Upper Heyford Site. This ex-military base benefits from planning permission for a new settlement, with existing consents delivering 1,134 homes. In light of the need for a significant uplift in housing resulting from the conclusions of the 2014 Oxfordshire Strategic Housing Market Assessment (SHMA), the submitted Local Plan was modified to provide for a substantial increase in the number of new homes to be provided at this site over the Plan period to 2031.</p> <p>Specifically, Policy Villages 5 confirms that an additional 1,600 homes will be provided alongside an additional 1,500 jobs over the Plan period to 2031. This significant increase recognises the strategic function of the Upper Heyford site which represents the only strategic employment/housing allocation outside of the main towns of Banbury and Bicester. (cont...)</p>

PR-A-059 Pegasus Group / The Dorchester Group	N/A(cont)	<p>(cont...) In the context of Policy Villages 5, Paragraph C.292 of the adopted Local Plan confirms that a comprehensive approach will be required to demonstrate how additional land for development can be satisfactorily integrated with the approved development. Through the Local Plan Examination in Public, a Statement of Common Ground was agreed between The Dorchester Group and the District Council (December 2014) which confirmed that:</p> <p><i>“The parties agree that to secure a high quality development (for housing and employment) there will be a need for a comprehensive review of the proposed development at the site that considers the important heritage landscape setting of the site and how additional development can be successfully integrated with existing consented development. This will provide the means to secure development incorporating high quality design that relates closely to the history of the site.”</i></p> <p>Furthermore the Statement of Common Ground also agreed that future development at Upper Heyford should first consider the release of appropriate brownfield land ahead of the release of green field sites. In this regard the agreed Statement of Common Ground stated:-</p> <p><i>“That there should be a sequential approach to development which should not otherwise be delayed in order to ensure the effective use of brownfield land within the existing airbase. The identified greenfield land outside the airbase should not be brought forward until a comprehensive scheme and delivery plan for the entire Local Plan allocation has been secured.”</i> (cont...)</p>
PR-A-059 Pegasus Group / The Dorchester Group	N/A(cont)	<p>(cont...) To achieve this comprehensive approach Cherwell District Council and The Dorchester Group have appointed a joint master planner, LDA Group, to develop a masterplan for the former airbase site in order to determine the extent to which the quantitative provisions of Policy Villages 5 (i.e. an additional 1,600 homes and 1,500 jobs) can be accommodated on this brownfield site, taking account of heritage and ecological constraints.</p> <p>It is expected that once finalised the LDA Masterplan, which should reflect the emphasis on brownfield land as agreed through the Statement of Common Ground as well as specific Local Plan Policy BSC 2, will be presented to the CDC Executive Committee with the recommendation that its findings / assessment is endorsed as a material consideration upon which additional development at the Policy Villages 5 allocation will be guided, and so addressed.</p>
PR-A-060 S Daggitt	2	<p>The economy and employment prospects in the Oxford area are already amongst the best in the country. Development which generates additional employment is much more badly needed in many other parts of the United Kingdom. By planning for more industry/commerce you:</p> <ul style="list-style-type: none"> a) Generate an even greater need for housing thus undoing any gains made by building more houses in the first place. b) Damage other areas of the UK which have more housing stock but few employment opportunities.
PR-A-060 S Daggitt	9	<p>The government has stated quite clearly that the Green Belt is to be protected from incursion. The Green Belt has been one of the great successes of national planning policy but will become meaningless if the boundaries can be moved when expedient.</p>
PR-A-060 S Daggitt	26	<p>It is important that the need for housing should not be an excuse for development within, or surrounding, Conservation Areas in Cherwell's villages and towns. Individual houses or premises may be appropriate but sites suitable for a minimum of ten houses, as called for in the site submission invitation, should not be located in, or next to, Conservation Areas.</p>

PR-A-061 Gerald Eve LLP / Merton College	1	<p>Given that the Local Plan Partial Review is in response to Oxford's unmet housing need, new additional housing should be directed towards sites that are sustainably located and in close proximity to Oxford. The focus should be upon minimising commuting distances and journey times in and out of Oxford, by developing housing on sites that are (or have the potential to be) well connected to the City and its associated employment hubs. It is within this context that this question should be answered. Cherwell District should therefore be considering these locations and not the district as a whole in order to deliver housing growth associated with Oxford itself.</p> <p>The 3,500 home working assumption appears to be based upon the assumption that all four surrounding local authorities can contribute an equal amount of sustainably located land in close proximity to Oxford that can be made available for housing development to meet Oxford City's shortfall of 15,000 homes. (cont...)</p>
PR-A-061 Gerald Eve LLP / Merton College	1	<p>(cont...) We have prepared the enclosed Greater Oxford Constraints Plan which is a preliminary 'sieve map' identifying development constraints that could affect each district's ability to deliver such land and therefore illustrates holistically the constraints around Oxford's Fringe. These constraints include, but are not limited to, the Oxford Green Belt, Areas of Outstanding Natural Beauty, Ancient Woodlands, Sites of Specific Scientific Interest, Areas of Landscape Value, Special Areas of Conservation, along with Scheduled Ancient Monuments and areas of historic significance. Considering the constraints to development that the enclosed Greater Oxford Constraints Plan (preliminary 'sieve map') identifies we consider that it is likely that a number of the adjoining local authorities may be unable to contribute sufficient appropriate land to provide 3,500 homes and on this basis the reasonable working assumption for Cherwell should be increased to at least 5,000+ homes. This is considered appropriate in order to take account of the nature and extent of constraints to development within other 'partner' authorities within the wider area and a preliminary estimate of their potential shortfall. In order to negate potential shortfalls in other districts we consider a reasonable working assumption for Cherwell should therefore be at least 5,000+ homes.</p> <p>The environmental development constraints present in some local authorities around Oxford make it unlikely that 15,000 homes could be provided in close proximity to Oxford at sustainable locations. We therefore consider that in order for the Oxford City Council assumed 15,000 shortfall to be met by neighbouring authorities, Cherwell would need to assist further in meeting the overall shortfall, with the application of the higher working assumption (5,000+). This is considered to form part of Cherwell District Council's Duty to Co-operate cited within the NPPF and the NPPG. (cont...)</p>
PR-A-061 Gerald Eve LLP / Merton College	1 1+9	<p>(cont...) In order to have the ability to deliver new homes in line with a higher working assumption (minimum 5,000+ homes), Cherwell District Council should consider the release of appropriate parts of the Oxford Green Belt, considering the five purposes of Green Belt set out at Paragraph 80 of the National Planning Policy Framework ["NPPF"]. This will be critical to meeting Oxford's Unmet Housing Need. Furthermore, we consider that Oxford's Unmet Housing Needs are exceptional circumstances, in accordance with Paragraph 83 of the NPPF, given the significant shortfall in housing delivery relative to needs which have been identified. Paragraph 84 states that local planning authorities should take account of the need to promote sustainable patterns of development. Accordingly, the Green Belt should be reviewed in order that sustainable patterns of development can emerge and the higher working assumption can be achieved.</p> <p>In terms of development constraints, which are mapped on the enclosed Greater Oxford Constraints Plan (preliminary 'sieve map'), we consider that the consideration of sites should be undertaken applying a 'sieve test' approach. This approach assists with the identification of the environmental and policy constraints around Oxford. The use of this approach would mean that each site is considered on the basis of the extent of constraints present, with those sites which are less constrained being favoured and put forward for development ahead of those that are more constrained. The sieve map is therefore intended to highlight the least constrained sites. We consider that this will be important in order to efficiently work towards meeting the higher working assumption (5,000 units+) set out. (cont...)</p>

PR-A-061	Gerald Eve LLP / Merton College	2	<p>We consider that there is justification to provide additional employment generating development alongside housing bought about by the need to meet Oxford's Unmet Housing Needs where this is appropriate. There is an intrinsic link between jobs and homes and accordingly we consider that Cherwell needs to provide additional employment generating development in sustainable locations so as to ensure balanced growth into the future.</p>
PR-A-061	Gerald Eve LLP / Merton College	3	<p>The first key issue is that the Oxford and Oxfordshire City Deal (2014)¹ acknowledges how Oxford and Oxfordshire has underperformed and not reached its full potential when compared with other comparable areas around world-class universities. One of the key reasons for this is a shortfall of housing supply which has stifled Oxford's economic potential. Economic growth needs to be supported by housing supply and this is a key issue. To make a significant contribution to Oxford's economy, its unmet housing need must be provided in sustainable locations that will help to rectify Oxford's historic underperformance and help the City to grow.</p> <p>The second key issue is that the growth of Oxford is based around the knowledge economy. The Strategic Economic Plan and City Deal documents promote a north-south 'knowledge spine', which passes through Oxford from Science Vale to the south, to Bicester to the north through the southernmost areas of Cherwell District. Land within the Green Belt in Cherwell is well situated to provide well located new homes for workers at Oxford's key employment hubs along the Knowledge Spine. In order to make a firmer commitment to Oxford's housing and economic development, and the wider Oxfordshire areas, the City Deal sets out a long-term commitment to increasing connectivity between people and jobs, and opening up a choice of housing to skilled workers, as well as enabling specific sites.</p> <p>Cherwell, whilst currently constrained by the Oxford Green Belt, has the ability and opportunity to promote housing development which is in close proximity to the City, with a number of high quality transport links. (cont...)</p>
PR-A-061	Gerald Eve LLP / Merton College	3	<p>(cont...) Proposals within the Northern Gateway are a step in not only supporting regeneration in Oxford but also making a commitment to providing new homes. However, the role of Cherwell in meeting the longer-term needs of the City of Oxford has been underestimated. Given Oxford's anticipated unmet need it is clear that Cherwell lies in an advantageous position to continue this growth of the City and contribute to its increased economic performance and strength going forward.</p> <p>Cherwell, whilst currently constrained by the Oxford Green Belt, has the ability and opportunity to promote housing development which is in close proximity to the City, with a number of high quality transport links.</p> <p>Proposals within the Northern Gateway are a first step in not only supporting regeneration in Oxford but also making a commitment to providing homes. However, the role of Cherwell in meeting the longer-term needs of the City of Oxford has been underestimated. Given the anticipated unmet need it is clear that Cherwell lies in an advantageous position to continue this growth of the City and contribute to its increased economic performance and strength going forward.</p> <p>City Deal: Oxford and Oxfordshire, 2014. Oxford and Oxfordshire City Deal (2014). London: Deputy Prime Minister's Office and Cabinet Office.</p>
PR-A-061	Gerald Eve LLP / Merton College	4	<p>Additional housing growth in the District should be aiming to achieve an enhancement to Oxfordshire's economy and improve the quality of life of existing residents in Cherwell. Additional housing growth in Cherwell should be appropriately located to achieve these goals through development in the right locations that has regard and is sensitive to the setting and context of its existing surroundings. Cherwell District Council needs to ensure that additional growth is directed to sustainable locations within proximity to the City of Oxford, associated infrastructure and sustainable transport links. We consider that this is critical in order to ensure that future residents can access jobs, services and transport links. To this end, there is a need for particular consideration of sustainable locations in the areas surrounding the City of Oxford and in reasonable proximity to the recently opened Oxford Parkway station in order to improve Oxford's economic prospects.</p>

PR-A-061	Gerald Eve LLP / Merton College	5	The vision for meeting Oxford's Unmet Housing Needs should be focused upon providing homes in sustainable locations, with an appropriate mix of housing to meet those needs. Without this the economy of Oxford City, and Oxfordshire more widely, will not realise its ultimate potential. Accordingly, the Vision should encompass sites in accessible locations with the least development constraints and the 'sieve test' approach should be adopted. Please refer to the enclosed Greater Oxford Constraints Plan (preliminary 'sieve map') which illustrates the key development constraints and therefore the areas with the least development constraints which are considered as appropriate for the focussed vision for meeting Oxford's Unmet Housing Need. Please also refer to our responses to Questions 1, 6, 7, 8 and 9.
PR-A-061	Gerald Eve LLP / Merton College	6	We consider that focussing the 'area of search' upon areas well related to the City of Oxford is of critical importance if Cherwell is to effectively meet the unmet housing need of the City. As the economic powerhouse of the county, Oxford is critical to the ongoing economic success and increased economic performance of the City and its resultant effect on the wider Oxfordshire area is achieved through providing housing in sustainable locations in the surrounds of the City. The 'area of search' should be focused upon the southern areas of the Cherwell District, which benefits from the aforementioned transport links and infrastructure, proximity to Oxford and access to the market and knowledge which is associated with the City. It is important that travel times to areas of employment are also considered as part of the 'area of search' exercise so as to ensure that housing development does not materially increase the time taken to travel to work, impacting upon creating economic efficiency and quality of life.
PR-A-061	Gerald Eve LLP / Merton College	7	The 'area of search' should be considered in light of the development constraints across not only Cherwell but also other relevant areas of the county, and where necessary, focus upon those areas of the Oxford Green Belt in proximity to the City of Oxford which do not serve to meet the five purposes of the Green Belt prescribed under Paragraph 80 of the NPPF. As set out in response to Question 7, we consider that other key factors including transport links and access to the employment market of Oxford need to influence the 'area of search' with the focus being upon proximity and accessibility to Oxford.
PR-A-061	Gerald Eve LLP / Merton College	8	We consider that a district-wide approach is not appropriate and that the 'area of search' should be focussed upon the Oxford Fringe. The 'area of search' exercise should be driven by the need to direct housing development to areas with appropriate infrastructure given the strain which can be placed upon the existing infrastructure by increased populations. We consider that the majority of development should be situated in sustainable locations to the south of the District, in proximity to the City of Oxford in order to ensure that existing predominantly rural infrastructure does not become overstretched. Sites situated in sustainable locations and in single ownership, such as our client's sites which are submitted within the Call for Sites exercise linked to this consultation, are therefore considered to be deliverable and should be considered as appropriate locations for meeting Oxford's Unmet Housing Needs.
PR-A-061	Gerald Eve LLP / Merton College	9	The Green Belt should be considered. Green Belt assessments have already identified that certain parts of the Green Belt contribute less to its functions and purpose than others. It is considered most appropriate and sustainable to ensure that Oxford's Unmet Needs are met as close to Oxford as possible. This would minimise the stress placed on transport connections further out of the City and reduce journey times and distances to employment and key transport hubs. Development should be located as close to the centre of Oxford as possible as well as those areas that support its key economic functions and activities. We consider this critical in order to ensure that transport facilities and local infrastructure do not become overstretched as this will be detrimental to the continued growth of Oxford and the wider Oxfordshire area. The Green Belt can, where appropriate, allow for the appropriate expansion of the City's housing supply to accompany its current economic success. The siting of new housing within the boundaries of the current Oxford Green Belt is critical to ensuring the City's continued growth and progression.

PR-A-061	Gerald Eve LLP / Merton College	10	Yes. Housing development which is intended to meet Oxford's unmet needs should not be part of a generalised 'pot' for Cherwell. Instead, all of the 15,000 homes required to meet Oxford's unmet housing need should be allocated to a separate Oxford Fringe requirement. The Oxford Fringe should be a geographically-defined, cross-boundary area around the current boundary of the City of Oxford. As noted previously, we consider that with the 15,000 homes shortfall split between the neighbouring authorities, there is likely to be a shortfall in neighbouring authorities owing to the extent of natural environment protection in place, whilst Cherwell has the ability to over-deliver. The enclosed Greater Oxford Constraints Plan (preliminary 'sieve map') illustrates the areas which are subject to development constraints from the natural environment. From this it is possible to draw conclusions about constraints to neighbouring authorities. We consider that given the findings illustrated on the sieve map, the Vale of White Horse is particularly constrained and would therefore encounter the most difficulty in delivering housing to meet Oxford's Unmet Needs. We consider therefore that Cherwell, given the lesser development constraints in place, has the ability to deliver and should look to do so going forward if Oxford's identified Unmet Needs are to be met. We consider that the enclosed Greater Oxford Constraints Plan (preliminary 'sieve map') further highlights the need for consideration of a specific housing supply for the geographically-defined, cross boundary Oxford Fringe area in order to ensure that Oxford can meet its needs.
PR-A-061	Gerald Eve LLP / Merton College	11	Given that the emphasis should be upon ensuring housing provided under the revised Local Plan Part 1 (specific to meeting Oxford's unmet needs) is for Oxford City the delivery of housing associated with Oxford should be considered as separate from Cherwell's own strategy and five year housing land supply. New homes directed at meeting Oxford's unmet needs within Cherwell should be viewed solely as delivering housing for Oxford. This approach will allow for the separate consideration of housing land supply to meet the needs of Oxford without adversely affecting the existing Cherwell strategy for housing.
PR-A-061	Gerald Eve LLP / Merton College	20	We would be concerned about the economic impact of providing housing which is supposed to help alleviate Oxford shortfall in locations that are not well related to Oxford or its employment hubs. We consider that housing in certain areas of the Green Belt such as well-connected sites that provide only a low contribution to the functions of the Green Belt would provide the best platform to drive economic growth through housing. With particular relevance to the sites put forward, the Begbroke Science Park is identified as an area where economic development should be encouraged. The sites put forward within the Call for Sites, and particularly our clients' Yarnton site, are considered as sustainable locations to support this economic growth.
PR-A-061	Gerald Eve LLP / Merton College	21	The potential negative impacts associated with siting housing development away from the City of Oxford mean that potential development locations to meet Oxford's unmet needs need to be concentrated towards the south of the District. This will ensure that distance travelling is reduced as far as possible and the resultant potential impact upon economic efficiency and output limited. When considering potential development locations in the south of the district, the associated travel time and distance to employment areas need also be considered to ensure that housing to meet Oxford's unmet needs does not lead to increased travel time and distance which will lead to an adverse effect on economic productivity.
PR-A-061	Gerald Eve LLP / Merton College	28	Site submissions - Land to West of A44/Rutten Lane, north of Cassington Road, surrounding Begbroke Wood; Land to South of A34, north of Linkside Avenue; Land to South of A34, adjacent to Woodstock Road; Land to West of A44, north of A40
PR-A-061	Gerald Eve LLP / Merton College	12+13	We consider that the housing issues identified are heavily focussed on the existing context. Cherwell District Council will need to consider the future housing issues which arise as a result of the issues identified. In particular, the likely increase in need for housing near its boundary with the City of Oxford need be considered in order to ensure that the final Local Plan Part 1 addresses the likely position of the District at the point of adoption as well as beyond the 15 year period to the end of the Cherwell Local Plan's scope (2016-2031), setting out an appropriate strategy to remedy the issues linked to Oxford's unmet housing need.

PR-A-061 Gerald Eve LLP / Merton College 14+15

Cherwell District Council needs to carefully consider the broad location of new housing within the southern part of the District so that it is well related to the City of Oxford, associated infrastructure and sustainable transport links. We consider that this is critical in order to ensure that future residents, who are currently a part of Oxford's unmet need, can access jobs, services and transport links. To this end, there is a need for particular consideration of the areas surrounding and in reasonable proximity to Oxford Parkway station. There are a number of areas within close proximity to the station which suit housing development and the increased sustainable transport links serve to strengthen this position.

In terms of locations that the Council should be considering, we consider that the inclusion of Merton College's sites for housing would be appropriate and would be a positive step in meeting Oxford's unmet need in proximity to the City of Oxford. Our client as the owner of a number of sites within Cherwell has therefore proposed a number of sites in their ownership for consideration for housing development as part of the Call for Sites exercise associated with this Issues Consultation.

Each of these sites are considered appropriate for development that will help to meet the identified Unmet Needs of Oxford. They are situated in sustainable locations in proximity to Oxford, with limited development constraints. (cont...)

PR-A-061 Gerald Eve LLP / Merton College 14+15

(cont...) Yarnton

Our client's landholding within Cherwell District is to the west of the village of Yarnton, largely encompassing the Begbroke Wood and bordering the A44. In accordance with the requirements of the Call for Sites procedure, we have completed the Site Submission forms and appended a plan providing further details of the site.

We consider that housing development on this site would provide a large number of dwellings, helping to provide a substantial part of the Council's target to meet Oxford's unmet need. The site's location adjacent to Yarnton village means that any housing development coming forward would be served with local transport and amenity facilities mean that the development would be sustainable. The site can accommodate a large number of homes; any forthcoming proposal would include further local transport and amenity facilities as appropriate. Furthermore, any housing development could also be of the highest design standards in order to complement Yarnton's character.

The site is considered to be highly accessible with the A44 to the East and Cassington Road to the South, and is a short journey from the interchange with the A4260, A40 and A34, as well as Oxford Parkway Station and the Northern Gateway to Oxford. Furthermore, future improvements are proposed in the vicinity, and currently subject to consultation. We consider that the proposed A40/A44 relief road which will further enhance the accessibility of the area. (cont...)

PR-A-061	Gerald Eve LLP / Merton College	14+15	(cont...) In terms of the deliverability of housing, given that this large area of land is in single ownership, it is considered that the site is not subject to any particular ownership constraints and therefore could be delivered efficiently and begin to contribute to Oxford's unmet need.
			Wolvercote
			Our clients' landholdings around Wolvercote are located in part in the Northern Gateway area. Please see the appended plans providing further details of the sites (the site boundaries are outlined in red and the administrative boundary with Oxford City Council in blue).
			Parcel A is located to the north of the A34 and A40, whilst Parcel B is located to the south of the junction of the A34 and A44 and, in part, crosses the administrative boundary with Oxford City Council. Parcel C is located to the south of the A34 and to the east of the Oxford Parkway-London railway line. Given the drive by Oxford City Council to promote growth at the Northern Gateway, and the newly opened Oxford Parkway station in proximity to the north-east of the sites and Oxford Park & Ride/bus facilities to both the north and south of the sites, we consider these sites would be an appropriate and highly sustainable location for housing development. Furthermore, given the sites are located adjacent to arterial roads they are considered to have provision of excellent transport links. Parcel A is also located in the area of the A40/A44 relief road where future improvements are proposed, likely to further enhance the accessibility of the site in the future. (cont...)
PR-A-061	Gerald Eve LLP / Merton College	14+15	(cont...) We consider that given the location and accessibility of the Wolvercote/Northern Gateway area as a whole, the sites have the potential to deliver larger-scale residential development to meet Oxford's unmet housing needs. We consider that each site could benefit from the existing amenity facilities in the surrounding area, though in the cases of Parcels A, B and C where higher number of dwellings could be accommodated any forthcoming proposal
PR-A-061	Gerald Eve LLP / Merton College	16+17	Cherwell District Council need to consider the transport infrastructure surrounding potential development sites considered to assist in meeting Oxford's Unmet Housing Need. Sites in proximity to Oxford City Centre and its associated road (A34, A40 and A44) and rail (Oxford Parkway Station) should be seen as highly favourable potential development locations to meet Oxford's unmet need. These locations are not constrained in terms of access to Oxford City Centre and, with the perceived increase in housing in the area, sustainable means of transport could be initiated by Cherwell through the expansion of Park and Ride schemes to ensure transport infrastructure into the City does not become overstretched.
			We support the County Council's strategy of reviewing the viability of 'outer ring' Park and Ride locations in the future. The 'Science Transit' plan to upgrade public transport along the perceived 'knowledge spine' is also seen as a significant opportunity to ensure that potential development locations at the south of the District are supported by appropriate transport initiatives going forward and further support the potential development of sites to the north of Oxford. (cont...)
PR-A-061	Gerald Eve LLP / Merton College	16+17	(cont...) The sites discussed in response to Question 15 are appropriately placed to provide appropriate housing development, supported by appropriate transport infrastructure and are in areas which are significantly less congested than alternative sites in the wider area. Both current and envisaged improvements to transport, through a greater public transport offering and improvements to the A40 further support the sustainability of these sites. The A40 improvement works are seen as critically important to ensuring that those travelling East-to-West are as well supported by local infrastructure as those travelling North-to-South and will assist in ensuring there is no
PR-A-061	Gerald Eve LLP / Merton College	22+23	As set out above, we consider that southern areas of the District in proximity to Oxford are the most sustainable locations and, when considering potential development locations to meet Oxford's unmet needs, should form part of the 'area of search' and be considered as highly favourable for development.

PR-A-061	Gerald Eve LLP / Merton College	24+25	<p>As set out in our response to Question 1, and highlighted by the enclosed Greater Oxford Constraints Plan (preliminary 'sieve map'), we consider that large areas of land that would otherwise be well related to Oxford are constrained by the natural environment and subsequent planning policy protection. This includes, but is not limited to, the Oxford Green Belt, Areas of Outstanding Natural Beauty, Ancient Woodlands, Sites of Specific Scientific Interest, Areas of Landscape Value, Special Areas of Conservation, along with Scheduled Ancient Monuments and areas of historic significance.</p> <p>As a result of the extent of the Oxfordshire countryside which is currently protected, as shown in the enclosed Greater Oxford Constraints Plan (preliminary 'sieve map'), the potential development locations to meet Oxford's unmet needs are very limited. This is not only the case in Cherwell, but also the other 'partner' Districts who are to assist in meeting Oxford's unmet housing need. Development should therefore be directed to the least restricted areas around the City of Oxford. In line with our earlier comments, we therefore believe that Cherwell should review its Green Belt in areas which are not subject to further natural environment protection with a view to releasing land from the Green Belt.</p>
PR-A-062	Turnberry Planning Ltd / Exeter College	1	The question is phrased incorrectly, coming as it does, ahead of determining and consulting upon actual capacity of the various Districts. A reasonable assumption would be that 3,500 homes is a minimum target for each District until such time the evidence base and consultation processes develop.
PR-A-062	Turnberry Planning Ltd / Exeter College	2	Yes. As Oxford's unmet need in respect of Cherwell will need to be largely concentrated around North Oxford and Kidlington, it would be appropriate to take advantage of the opportunity created by the cluster of world class economic assets, particularly high value employment that supports innovation and technology.
PR-A-062	Turnberry Planning Ltd / Exeter College	3	Oxford City Council has made a compelling case that its future success depends on the release of land from the Green Belt to meet its unmet need. We support the City Council's objective and the process of reviewing the Green Belt, but beyond conventional Green Belt tests, the principles of accessibility, place-making, neighbourhood planning and economic development should guide the release of Green Belt.
PR-A-062	Turnberry Planning Ltd / Exeter College	4	<ol style="list-style-type: none"> 1. High value employment and innovation: Taking advantage of the Oxfordshire bioscience and technology cluster with the associated benefits for Cherwell in providing spaces to support the growth of high value employment; 2. Live/Work: Promoting the close proximity of housing and work spaces to foster innovation and reduce reliance on the car;
PR-A-062	Turnberry Planning Ltd / Exeter College	5	Place-making: Taking the key principles expressed in response to Q4 and using them to masterplan high quality neighbourhoods that enhance the District and off-set the loss of Green Belt.
PR-A-062	Turnberry Planning Ltd / Exeter College	6	Yes, that would be an entirely logical response as the unmet need relates to Oxford and those locations which offer convenient and sustainable access to urban Oxford should be favoured.

PR-A-062	Turnberry Planning Ltd / Exeter College	7	<p>Opportunities to create free-standing communities should be looked at carefully. The close proximity of urban centres in Oxford and Kidlington mean villages in this area will have a level of sustainability that is not available to villages in remoter parts of the District. Moreover, they can support a greater range of services and avoid competing or over-extending existing settlements. Once planned, they offer no further opportunities for expansion and deliver greater certainty to existing communities.</p> <p>We refer to recent DCLG Consultation on Proposed Changes to National Planning Policy published in December 2015 in support:</p> <p>"We propose to strengthen national planning policy to provide a more supportive approach for new settlements, within locally led plans. We consider that local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes. In doing so local planning authorities should work proactively with developers coming forward with proposals for new settlements in their area." (Paragraph 20)</p> <p>The close proximity of bus and train connections should also be a key factor in selecting an area of search.</p>
PR-A-062	Turnberry Planning Ltd / Exeter College	8	No, that would be illogical – see Q6.
PR-A-062	Turnberry Planning Ltd / Exeter College	9	Yes – but within that, the criteria for site selection should favour proximity to urban Oxford and public transport.
PR-A-062	Turnberry Planning Ltd / Exeter College	15	See our response to Q 6,7, 8 and 9, but we consider the area between Oxford and Kidlington as being best suited to meet the majority of the unmet need within Cherwell District.
PR-A-062	Turnberry Planning Ltd / Exeter College	28	Site submission - Frieze Farm, Woodstock Road, Oxford.
PR-A-062	Turnberry Planning Ltd / Exeter College	17, 21, 23, 25, 27	<p>We consider our responses to Q 6, 7, 8, 9 and 15 to entirely align with these issues in terms of the suitability of the area between Kidlington and Oxford, as well as the principles set out in response to Q 4.</p> <p>We would also point out that this area is of low ecological value, has few environmental constraints and benefits from the potential of engaging with the Oxford Canal, an important tourist resource. There is also no direct relationship between this locality and the historic core of Oxford.</p>
PR-A-063	Oxfordshire County Council	1	<p>The scale of Oxford's unmet housing need to be apportioned to Cherwell will be decided by the Growth Board following completion of the post SHMA work Programme, currently scheduled for September 2016; this joint work will provide high level assessment of strategic spatial options for accommodating unmet need. The Growth Board is using 15,000 as working assumption for the scale of unmet need to 2031.</p> <p>The County Council understands the need for CDC to commence work for the early review now in order to meet its commitment in the Local Plan Part 1 to complete the review within two years of the Part 1 adoption and it is helpful for this work to be based on a realistic working estimate of the apportionment figure until the Growth Board decision is known. (cont...)</p>

PR-A-063	Oxfordshire County Council	1	<p>(cont...) However, the County Council considers it would be more appropriate for this initial work to use a range for the scale of unmet need which the review may need to plan for. A single working figure of 3,500 - based on 15,000 divided by 5 with a marginal uplift of 500 - is too specific and does not allow sufficient headroom for the outcome of the joint work showing that an equal apportionment between the five councils would not produce the most sustainable solution for the Oxfordshire HMA. It will be important to incorporate the right solution for Oxfordshire into the Partial Review. Provision could be higher or lower than 3,500 homes; we suggest that a range of 2,500 - 4,500 would provide reasonable indicative lower and upper figures.</p> <p>(The true scale of Oxford's unmet need will not be determined until the review of the Oxford's Local Plan is completed).</p>
PR-A-063	Oxfordshire County Council	2	<p>Oxford's Objectively Assessed Need (OAN) of 28,000 identified in the SHMA is based on making a significant contribution to meeting affordable housing needs in the City. The OAN is not based on supporting economic growth and currently there is not an identified, overall employment land supply issue in the City which would need to be resolved within Cherwell through this review.</p> <p>However, there are some key employment sectors within Oxford important to the Oxfordshire economy eg research activities associated with the University, which are looking to expand but whose particular land requirements cannot easily be met within the City. It may be appropriate for these specific unmet Oxford employment needs to be accommodated alongside solutions for unmet housing needs within Cherwell through the allocation of mixed use sites. Consideration could also be given to co-locating expanding employment uses with options for meeting Cherwell's local employment needs, particularly if there are synergies with existing employment generating development already located within the district. (cont...)</p>
PR-A-063	Oxfordshire County Council	2	<p>(cont...) 90,000sq.m of employment space is planned on land adjoining Cherwell at Northern Gateway. From a sustainability perspective, there would be benefits in providing housing development in locations which could take advantage of existing/potential public transport links to the job opportunities at Northern Gateway.</p> <p>There may also be scope for minor ancillary employment generating uses as part of strategic mixed use, housing-led options for unmet need eg at local centres, schools etc.</p>
PR-A-063	Oxfordshire County Council	3	<ul style="list-style-type: none"> - Oxford's affordable housing needs as identified in the SHMA - Need for sites to have good accessibility by fast and frequent public transport, cycling and walking into the City centre and to other key employment locations in Oxford - the Plan should consider the relationship between housing sites and the Oxford transport Strategy. It should require new housing sites on or near a Rapid Transit route to Oxford or near to a Park and Ride site to contribute towards improvement measures for that infrastructure. In addition these housing sites should not prejudice the delivery of these measures as defined in the Oxford transport Strategy.
PR-A-063	Oxfordshire County Council	4	<p>A key principle should be to make best use of existing and planned infrastructure and to minimise the need for new infrastructure.</p> <p>Additional housing growth should be planned in such a way as to facilitate the delivery of services and infrastructure, either by being located where existing services/infrastructure would benefit from additional population, or are capable of being expanded in a cost-effective manner, or by being clustered in such a way as to make the creation of new infrastructure viable. If new primary schools are required, a concentration of at least 1,000 new homes would typically be required to make a new school viable; for secondary schools, a concentration of at least 3,000 new homes would typically be required, although this can be over a larger area. Additional housing growth should be considered in conjunction with that already in the Local Plan Part 1.</p> <p>Those sites on strong public transport corridors (both bus and rail) should be considered for low car or car free development.</p>

PR-A-063	Oxfordshire County Council	5	The Vision for meeting Oxford's unmet need should take account LTP4, including the Oxford Transport Strategy.
PR-A-063	Oxfordshire County Council	6	Yes, as the options are to meet Oxford's unmet need; anything else would not be sustainable development.
PR-A-063	Oxfordshire County Council	7	Options should relate well to Oxford by way of proximity and/or accessibility. The County Council suggests that an area of search is based on key transport corridors which have existing, planned or potential for fast and frequent public transport services to Oxford centre and key employment locations within the City.
PR-A-063	Oxfordshire County Council	8	No – some areas of Cherwell do not relate well to Oxford. Also in those locations already proposed for significant growth – Banbury, Bicester, Upper Heyford – the market is unlikely to be able to deliver significant additional housing to meet Oxford's unmet needs.
PR-A-063	Oxfordshire County Council	9	No. An area of search based on the Green Belt would not necessarily lead to options which have good accessibility to existing, planned or potential fast and frequent public transport services to Oxford centre and key employment locations within the City. The area of search should include Green Belt land within transport corridors through the Green Belt but should not be contiguous with the Green Belt boundary.
PR-A-063	Oxfordshire County Council	10	The County Council can understand why Cherwell might wish to separate the unmet need requirement from Cherwell's own housing requirement for five year land supply purposes. However, given the latent demand for housing from Oxford and the market interest in developing in and around the City, it is quite possible that sites will come forward early in the plan period and enable a good supply of deliverable and developable sites
PR-A-063	Oxfordshire County Council	11	The district could consider a ring fence approach.
PR-A-063	Oxfordshire County Council	12	There should be more explicit emphasis on access by public transport.
PR-A-063	Oxfordshire County Council	15	Locations along transport corridors which have existing, planned or potential fast and frequent public transport services to Oxford centre and key employment locations within the City and locations which would encourage cycling and walking as a mode of travel to and/or within Oxford. The selection of sites for development should take into account planning policy on safeguarding of mineral resources and infrastructure and waste management infrastructure, in particular policies M6, M8, M9 and W11 in the submitted Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy (Proposed Submission Document, August 2015).
PR-A-063	Oxfordshire County Council	16	There are a number of transport issues mentioned in the consultation document which need updating: - The Park & Ride study is now underway (see comments for Question 86 of OCC's Local Plan Part 2 response) - The East West rail connection with Milton Keynes is now due to open from 2019
PR-A-063	Oxfordshire County Council	17	The Partial Review will need to take account of the conclusions and recommendations of the Park & Ride Study

PR-A-063	Oxfordshire County Council	18	<p>Strategic Policy Comments-</p> <p>In planning development to meet Oxford's unmet needs, it should be emphasised that impacts on existing infrastructure must be thoroughly assessed and careful consideration given to the phasing of new infrastructure with development.</p> <p>Although it might be appropriate to develop a separate housing requirement and strategy for accommodating Oxford's unmet need, the assessment, planning, funding and delivery of supporting strategic infrastructure will require a comprehensive approach which takes account of already planned growth in Cherwell and planned and emerging growth elsewhere in Oxfordshire.</p> <p>In Oxfordshire there is already a need to address a funding gap for strategic infrastructure required to support planned growth, taking into account existing government funding schemes. In the continued climate of financial restraint for local authorities, the County Council would not wish to see options for Oxford's unmet need come forward which would significantly increase the infrastructure funding shortfall.</p>
PR-A-063	Oxfordshire County Council	18	<p>Education Comments-</p> <p>Para 5.66 states:</p> <p><i>"For Banbury, the IDP highlights a new primary school at South of Salt Way, one at Bankside, one at Southam Road, one at Drayton Lodge Farm..."</i></p> <p>OCC have never sought a new primary school at Drayton Lodge Farm. Comments to this effect were provided for the IDP update. The updated IDP that went to Cherwell's Executive on 4th January 2016 reflected these comments.</p>
PR-A-063	Oxfordshire County Council	19	<p>Consideration should be given to spatial options which:</p> <ul style="list-style-type: none"> - can take advantage of existing and planned investment in strategic infrastructure - might strengthen the business case for new or improved strategic infrastructure
PR-A-063	Oxfordshire County Council	20	<p>It should be recognised that many residents of the new housing sites are likely to work in Oxford and therefore, it is important that housing sites are located along established or proposed public transport corridors.</p> <p>Reference should be made to the Oxfordshire Creative Cultural Heritage and Tourism Investment Plan. This sets out the value of these sectors to the Oxfordshire economy and would strengthen the text around the value of tourism in Cherwell.</p>
PR-A-063	Oxfordshire County Council	22	<p>OCC consider sustainability to be a key principle. Please see our response to Question 4.</p>
PR-A-063	Oxfordshire County Council	24	<p>The cumulative ecological impact of the extra development required, not just within Cherwell but also any development along the Districts' boundaries, needs to be considered for sensitive receptors (such as local and European designated sites). This is especially important within the Zone of Influence (ZoI) for the Oxford Meadows Special Area of Conservation (SAC).</p> <p>It is important to maintain the integrity of Conservation Target Areas (CTA's), as well as any other proposed Green Infrastructure linkages.</p>
PR-A-063	Oxfordshire County Council	25	<p>The issue of cumulative ecological impact could particularly affect locations put forward for housing development within the ZoI for Oxford Meadows SAC. This is because even if there will be no hydrological impacts on the SAC, the air pollution generated by extra traffic in the local area could affect the SAC grassland.</p>
PR-A-063	Oxfordshire County Council	26	<p>Para 5.146: the District contains 38 scheduled ancient monuments and not 36 as set out in this document. It also contains 6 registered parks and gardens and 1,402 non-designated archaeological heritage assets.</p>

PR-A-063	Oxfordshire County Council	28	No (but see sites nominated as part of Local Plan Part 2)
PR-A-063	Oxfordshire County Council	1+19	<p>Oxfordshire County Council are committed to continuing the positive and pro-active joint working with CDC and welcome the opportunity to comment on the issues that the Local Plan Part 1 Partial Review will need to address. As with the preparation of the adopted Local Plan Part 1, the main issue for OCC is the identification, provision, funding and overall deliverability of the infrastructure and County Council services needed to support sustainable development.</p> <p>KEY ISSUES-</p> <ul style="list-style-type: none"> - It would be more appropriate for Cherwell to use a range for the scale of unmet need which the review may need to plan for. A range of 2,500 - 4,500 homes would provide reasonable indicative lower and upper figures. - Additional housing growth should be planned in such a way as to facilitate the delivery of services and infrastructure, either by being located where existing services/infrastructure would benefit from additional population, or are capable of being expanded in a cost-effective manner, or by being clustered in such a way as to make the creation of new infrastructure viable. (cont...)
PR-A-063	Oxfordshire County Council	4+7+19+10	<p>(cont...) - The Vision for meeting Oxford's unmet need should take account LTP4, including the Oxford Transport Strategy.</p> <ul style="list-style-type: none"> - The 'area of search' should relate well to Oxford by way of proximity and/or accessibility. The County Council suggests that an area of search is based on key transport corridors which have existing, planned or potential for fast and frequent public transport services to Oxford centre and key employment locations within the City. - In planning development to meet Oxford's unmet needs, it should be emphasised that impacts on existing infrastructure must be thoroughly assessed and careful consideration given to the phasing of new infrastructure with development. - Whilst it may be appropriate to develop a separate housing requirement and strategy for accommodating Oxford's unmet need, the assessment, planning, funding and delivery of supporting strategic infrastructure will require a comprehensive approach which takes account of already planned growth in Cherwell and planned and emerging growth elsewhere in Oxfordshire.
PR-A-064	David Lock Associates / Gallagher Estates	1	<p>The strategic context introduced through the Localism Act and NPPF requires cooperation and cross boundary working between neighbouring Local Authorities to meet housing and economic needs. We therefore welcome the approach taken by the Local Authorities to help meet Oxford's Housing Needs.</p> <p>We note that the Oxfordshire Growth Board are using a "working assumption" of 15,000 as the total of Oxford's unmet needs, stating (at paragraph 2.14 of the Issues Consultation Report) that the figure will be refined and the distribution amongst individual districts will be agreed following completion of the County study, expected in Summer 2016.</p> <p>Cherwell's indicative 3,500 figure is based on equal apportionment of the overall Oxfordshire Growth Board figure of 15,000 (split between the five Oxfordshire authorities) – that is 3,000 dwellings each, and an additional 500 dwellings as a contingency to reflect other factors that might affect Oxford's and/or, another district's ability to take its assumed housing growth, taking into account the relevant sustainability credentials of the Oxfordshire Districts as a whole.</p>

PR-A-064 David Lock Associates / Gallagher Estates	1	<p>(cont...) Whilst the report makes clear that the 15,000 Oxford unmet figure is to be used as a working figure for assessing the spatial options for growth, the Strategic Housing Market Assessment 2014 need for Oxford reported 28,000 dwellings required for the period 2011-31 and when considered against a supply figure of 10,212 dwellings (Strategic Housing Land Availability Assessment, 2014), this produces a shortfall of some 18,000 dwellings. That is some 3,000 dwellings over and above that currently being considered as a "working assumption" for unmet need.</p> <p>It would seem appropriate therefore that to ensure that the needs of the Oxfordshire Housing Market Area are met in full, a range of options should be tested above the assumed 3,500 additional dwellings in Cherwell District.</p> <p>Furthermore, it is important that the emerging spatial strategy for the Local Plan Partial Review is responsive and flexible enough to ensure that the capacity for Cherwell to sustainably meet Oxford's unmet needs is not fettered by the imposition of an indicative threshold that is driven by an approach that seeks equal apportionment of growth across the districts. Cherwell District Council benefits from a strong geographic and economic relationship to Oxford City, enhanced by good strategic transport connections, and relatively limited areas of green belt, in comparison with other authorities, and may be well placed to take growth above the 3,500 initially suggested.</p>
PR-A-064 David Lock Associates / Gallagher Estates	15	<p>Gallagher Estates considers there is an opportunity to direct additional growth to locations within or immediately adjoining the main towns of Banbury and Bicester, where economic growth and housing development can be planned comprehensively to promote a sustainable form of development advocated by the National Planning Policy Framework and where substantial infrastructure investment is already planned.</p> <p>A further opportunity exists for villages to accommodate further growth, with due consideration afforded to their size, service provision and relative connectivity/ accessibility to Oxford.</p>
PR-A-064 David Lock Associates / Gallagher Estates	28	<p>Site submission - Land at Wykham Park Farm, North of Wykham Lane, Banbury</p>
PR-A-064 David Lock Associates / Gallagher Estates	6-9	<p>This consultation is at a preliminary stage and seeks to scope the options for Cherwell's ability to meet a proportion of Oxford's unmet need. As discussed, the extent of Oxford's unmet need is not fixed, and therefore it is important that a range of options are tested to enable a robust issues and options assessment to be carried out.</p> <p>It is critical that there is a transparent and consistent assessment process that is not unduly limited by the imposition of "areas of search" that might close off options/locations within which growth can be sustainably accommodated. Clarity should be given as to what factors would constitute "well-related" to Oxford. The imperative is to address Oxford's needs sustainably and therefore assessment of accessibility and connectivity should be considered.</p> <p>Gallagher Estates consider that a district-wide search area is appropriate; Cherwell District falls within the Oxfordshire Housing Market Area and it would seem sensible to consider options within the district from which the need is generated, this might include consideration of Oxford Green Belt as a potential option.</p>

PR-A-064	David Lock Associates / Gallagher Estates	10+11	<p>Gallagher Estates do not consider that a specific housing supply for meeting Oxford’s needs should be identified. Cherwell’s contribution to meeting Oxford’s unmet need will form part of the overall strategy to deliver growth which seeks to meet objectively assessed development (including unmet requirements from neighbouring authorities) as advocated in the NPPF.</p> <p>Cherwell’s specific housing need and Cherwell’s proportion of Oxford unmet need are both to be met within Cherwell administrative boundary and should be combined and planned comprehensively through a single approach over the Plan period.</p> <p>Whilst we note that the Partial Review will have a specific focus and will form an addendum to the Local Plan Part 1, we would suggest that the overall housing target for Cherwell should also be reviewed to ensure it is up to date and is “drawn up over an appropriate time scale, preferably a 15-year time horizon” (para 157 NPPF). (cont...)</p>
PR-A-064	David Lock Associates / Gallagher Estates	10+11	<p>(cont...) Final publication of the Partial Review is anticipated 2018, as such it is suggested that the Oxfordshire SHMA should be updated to include a housing target that extends beyond the current time horizon of 2031, to provide a basis on which to positively plan for growth over a sufficient time horizon - that being at least 15 years as advocated by the NPPF.</p> <p>It is considered that a range of sites will be required to meet Cherwell’s own needs and Oxford’s Unmet Housing needs jointly, an approach that will provide housing delivery benefits, and will offer increased variety and choice in the market. As discussed, a full range of options will need to be considered to establish a robust spatial strategy that adequately and sustainably meet Cherwell’s own housing needs and those of Oxford City (unmet).</p> <p>It is important that the contribution that smaller sites can make to the early delivery of homes which address short-term housing need in combination with larger strategic/mixed use sites, receives full and proper consideration within any emerging strategy.</p>
PR-A-064	David Lock Associates / Gallagher Estates	4+5	<p>At the heart of national planning policy is the objective to achieve sustainable development (NPPF paragraphs 6-14). In order to achieve this a clear focus is required within the Local Plan review to ensure that the most sustainable locations are prioritised.</p> <p>The Local Plan Review must ensure that the most sustainable locations, are identified and given greater weight, to ensure appropriate sites are supported through the site selection process.</p> <p>Banbury is the larger of Cherwell’s two towns and has a significant commercial, retail, employment and housing market. The growth identified at Banbury through the Local Plan Part 1 will serve to bolster the economic and social function of the town for its residents and businesses. Additional growth at Banbury will serve to support the foundations laid by the Local Plan Part 1.</p> <p>Due consideration should also be given to locations that meet local needs, but also to the identification of locations that accommodate sustainable transport opportunities to Oxford.</p>
PR-A-065	I Grace		<p>1 Cherwell District Council has already made provision for very large housing numbers in the adopted local plan. These numbers have translated through to truly massive housing allocations.</p> <p>If built these allocations will result in the provision of some 22,000 new housing units in the district. This is likely to feed through to a population increase of over 40,000 people, effectively another Banbury built in the district. This represents about a 30% increase in the district’s population. And about a third of Oxford city’s current population.</p> <p>Clearly this figure is far in excess of the figure generated by natural increase within the district and makes allowance for a very large rate of in migration. I would therefore suggest that we (CDC) have already made generous allowances for Oxford’s housing needs. (cont...)</p>

PR-A-065 I Grace

20 (cont...) In no small part the district's very large housing requirements in the adopted local plan are the result of the plan's very generous (and probably over optimistic) commercial land allocations. Put very simply if you build commercial floor space in areas of full employment you will pull in workers. If you pull in workers you need to provide housing for them.

We could "make space" for Oxford's overspill housing by reducing our commercial allocations which would in turn reduce housing demand which would allow the "slack" in our allocations to be taken up by Oxford's perceived needs.

We could start by deleting that truly awful commercial allocation east of the motorway (junction 11). South Northants are very right about that one.

What I think that we should do our very best to avoid, but which I fear we are likely to end up with, is further large, greenfield and essentially unsustainable housing allocations "bolted on" to the existing already over expanded market towns.

The current Cherwell District Council Local Plan is an awful document. If built it will create a district which is more crowded, congested, polluted and far far less attractive to live in than it currently is. That is hardly an achievement to be proud of and I would beg you not to make that situation worse with further large greenfield housing allocations.

PR-A-066 Oxalis Planning /
Blackfield Land Ltd

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(cont...) We consider that a number of key transport issues, and associated land-use planning issues, are missing from the consultation document and should feature in the next stages of the partial review. In particular, there is no reference or cross-reference to freight and distribution related transport (road and rail). While the focus on the movement of people is understood in the context of a focus on housing growth, this should not be at the expense of also considering the needs for transport connectivity to enable the movement and storage of goods or materials. Such movements play a key role in supporting a wide range of sectors, including high-value engineering, manufacturing and retail sectors. Therefore, the need for additional logistics or distribution development sites in Cherwell should be explicitly considered as part of the partial review. Along with planning to meet housing needs, this too forms an essential part of the local, sub-regional and national economy, and brings with it a need for development land in suitable and sustainable locations.

We have also made representations to the Part 2 Local Plan Issues consultation regarding the issue of strategic logistics sites. However, as a strategic (as opposed to 'non-strategic') issue, our view is that this would be an appropriate issue for the partial review, and that there is a need to allocate additional employment sites.

PR-A-066 Oxalis Planning /
Blackfield Land Ltd

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We welcome that the Issues consultation document includes a section on the Economy, as well as sections on Infrastructure and Transport. We feel it is essential that the review to consider the most appropriate distribution and scale of housing development to help meet Oxford's unmet needs also consider the associated economic issues.

It is clear that Cherwell District and Oxford City share a range of functional and economic cross-boundary relationships. It is also clear that Oxford is highly constrained in terms of the City's administrative boundaries, and the limited availability of potential development land is of direct relevance to employment development as well as for housing. We believe the issues identified for the partial review should include further work relating to the scope for cooperation between Cherwell and Oxford City regarding strategic employment sites alongside consideration of how and where Cherwell accommodates a proportion of Oxford's unmet housing needs. We consider this essential if Cherwell is to positively address the challenges posed by the high levels of out-commuting and if the challenges of congestion are to be addressed. (cont...)

PR-A-066 Oxalis Planning / Blackfield Land Ltd	20	<p>(cont...) The issue of identifying sites to accommodate large scale logistics buildings was discussed during the Local Plan Part 1 examination process, and the Council has previously recognised that further policy guidance is required and that provision (allocations) should be made for strategic logistics/distribution development. The separate Part 2 Local Plan Issues Consultation document includes a reference to ‘further economic assessment work’ being planned with regard to large-scale logistics sites, but does not offer any detail as to how or when the issue will be addressed. In our view, having identified this issue previously as a pertinent and relevant strategic local planning issue, the Council should incorporate it into the scope of the partial review of the Local Plan. The 2015 Local Plan Inspector’s Report made several comments about the development pressures for large logistics sites, dismissing them as being ‘speculative’ with reference to the need for such sites as being ‘as yet unproven’. Furthermore, the Inspector’s comments were also predicated on an assumption that ‘such schemes would be road based’ (paragraph 41, Inspector’s Report, May 2015). We would strongly challenge a number of the Inspector’s conclusions and assumptions, and remain of the view that this strategic land-use needs to be actively and explicitly planned for. It would be logical and appropriate to incorporate this issue into the partial review alongside the work needed to revisit the distribution of strategic housing development. (cont....)</p>
PR-A-066 Oxalis Planning / Blackfield Land Ltd	20	<p>(cont...) It is clear that there are numerous potential development sites in the District, several of which are likely to be well suited to strategic distribution and logistics development. As specific examples, sites were being promoted by other parties during the examination in the vicinity Junction 10 of the M40, and Blackfield Land Ltd is involved in promoting a different site at Junction 10 of the M40. We are actively seeking to bring this site forward, and contrary to the Inspector’s assumption, are actively exploring the potential for a rail freight interchange. Furthermore, and also contrary to the Inspector’s comments, the site includes previously developed land adjacent to the M40, with limited ‘intrusion’ into open or virgin countryside. Our technical work to assess and the site is ongoing, but such a proposal would make a significant contribution to the economy of the District, but also support wider economic objectives across the LEP area and Oxford housing market area. We are also exploring the opportunities to include new local highways infrastructure to address existing local challenges, and to the benefit of existing local communities nearby. We are keen to discuss these emerging proposals with the Council and to provide plans and other details in due course.</p> <p>Our ongoing work in relation to the potential of this site is informed at the national level by the clear and explicit support for, and recognition of the need for, a network of rail freight interchanges across the UK to help deliver against environmental as well as economic objectives and priorities. It is also a direct response to the strong locational advantages of Cherwell, something which has already seen a number of strategic sites emerge earlier in the plan-making process in response to market demand and requirements. The local strength and opportunities of the logistics sector are recognised in the Council’s Cherwell Economic Analysis Study of 2012. The SEMLEP Strategic Economic Plan for 2015-2020 identifies Logistics as ‘key sector’.</p>
PR-A-066 Oxalis Planning / Blackfield Land Ltd	20	<p>(cont...) As a long-term plan looking ahead to 2031 our view is that the approach of the adopted Local Plan has no flexibility with regard to responding to market signals and economic opportunities. We note that one of the economic challenges facing the District included in the Adopted Local is:</p> <p>“new employment sites are needed to meet modern business needs”</p> <p>The lack of a clear strategy and policies for actively addressing the issue of strategic logistics and distribution development represents a critical weakness in the Council’s response to this challenge. Although advocated by the Inspector, we do not feel it is sound to progress with a planning strategy which provides such limited guidance on this key issue. Given the potential and the need for development of such strategic sites early in the plan-period, we don’t believe delaying until a subsequent review of the Local Plan is appropriate or sound.</p>

PR-A-066 Oxalls Planning / Blackfield Land Ltd	16	<p>We welcome that the Issues consultation document includes a section on the Transport, as well as sections on Infrastructure and the Economy – we strongly support Cherwell District Council’s apparent intentions to consider the issues of Oxford’s unmet housing need in a comprehensive and holistic way rather than in isolation.</p> <p>The transport section of the consultation document identifies a number of key issues, including the County Council’s estimates that despite the high levels of congestion already seen in many parts of the City, there could be a 25% increase in journeys within the City of Oxford by 2031, with approximately 13,000 more commuter trips each day. While supporting and enabling the continued growth of Oxford through cross-boundary cooperation is clearly a requirement upon Cherwell District, it is also clear that reducing out-commuting from the District remains a key challenge and priority. The charts on page 47 of the consultation document help to illustrate the significant scale of the commuting flows from Cherwell to Oxford, and the strength of the existing functional and economic cross-boundary relationships. The scale and extent of these economic relationships can be expected to increase if housing growth is redistributed into Cherwell. (cont...)</p>
PR-A-067 Savills / Christ Church, Exeter College, Merton College and Oxford University Press	1	<p>The figure of 3,500 homes is derived from the work of the Oxfordshire Growth Board and represents a simple piece of arithmetic whereby 15,000 homes (the working assumption for Oxford City’s unmet need) is divided on a more-or-less equal basis between the 4 adjoining local authorities. In many ways this is an unsatisfactory approach to deriving a guideline figure as it fails to take account of a wide range of technical and environmental factors that will ultimately determine what the appropriate division between the local authorities ought to be.</p> <p>The Oxfordshire Growth Board is currently in the process of testing a range of strategic options for the spatial distribution of the unmet housing need. According to the reports submitted to the Growth Board meeting on 2nd February 2016, the analysis of strategic options is due to be concluded in September 2016. Given the fact that Cherwell District immediately adjoins the urban area of Oxford at its northern point it has the potential to contribute towards meeting the housing needs of Oxford in a very sustainable way i.e. meeting the need close to where it arises.</p> <p>It is therefore likely that the figure of 3,500 homes is an underestimate of the proportion of Oxford’s housing need that should be met in Cherwell.</p>
PR-A-067 Savills / Christ Church, Exeter College, Merton College and Oxford University Press	2	<p>It is a key principle of sustainable development that sites should contain a mix of uses so as to, for example, create a close relationship between homes and job opportunities and thereby reduce the length of journeys to work. In principle therefore the provision of additional homes to meet Oxford’s needs should be associated with the provision of additional land for employment. However, the appropriateness of providing jobs and homes on the same site, or in close proximity to each other, will depend upon the existing context of the site including the present availability of local job opportunities.</p> <p>In the case of north Oxford there is already a significant resource of local jobs available. Furthermore the planned development at Northern Gateway will deliver thousands more new jobs in the area. Given the existing and planned availability of local jobs there is no specific requirement to provide additional employment in the north Oxford area. The specifics of the North Oxford Triangle do however provide a unique opportunity to deliver business accommodation close to the Water Eaton station. This could prove to be an attractive location for existing and new businesses given the high quality of rail services to London.</p>

PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	3	<p>The key issue to consider in deciding on where to accommodate the unmet housing needs of Oxford is to seek to meet that need as close as possible to where it arises. This means that the most appropriate locations to consider in the first instance are those in, and on the edge of, Oxford.</p> <p>This approach does as a consequence determine that sites within the Green Belt are considered once the capacity of the urban area of Oxford has been fully utilised. This requires that 'exceptional circumstances' are established to justify a review of the Green Belt as required by the Framework at paragraph 83. The Colleges and OUP maintain that 'exceptional circumstances' do exist, including the following:</p> <ul style="list-style-type: none"> - the national and local imperative to deliver higher housing numbers and economic growth; - persisting jobs-homes imbalances in the local area; - poor housing affordability and a backlog of need; - worsening traffic congestion in and around Oxford; - staff recruitment and retention problems for local employees due to housing affordability, including meeting the needs of University and College employees for whom there is a pressing need for accommodation; - a lack of realistic alternatives to focusing growth at Oxford; and - a lack of capacity to accommodate all of Oxford's housing needs within the boundary of the city. (cont...)
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	3	<p>(cont...) With the 'exceptional circumstances' case established, the review of the Green Belt should be informed by an analysis of the extent to which land currently in the Green Belt contributes towards its five purposes as defined in the Framework at paragraph 80. This analysis has in part been undertaken in the Oxford Green Belt Study (LUC, 2015) commissioned by the Oxfordshire Growth Board. Whilst a useful reference document, the study is flawed due to the fact that it considers any expansion of the Oxford urban area to be 'urban sprawl'. This is not an accurate assessment of such sites given that new development per se cannot be considered 'sprawl' if it takes place as part of a plan-led exercise as required by the Framework.</p> <p>In addition, the Green Belt Study fails to take into account the sustainability benefits of locating new development on the edge of Oxford. For example, sites well related to Oxford would be able to take advantage of local employment opportunities and other facilities / services in the city and access them by sustainable modes of transport. The Colleges and OUP anticipate that the sustainability issues will be taken into account in the analysis of strategic options that the County Council is currently undertaking on behalf of the Oxfordshire Growth Board.</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	4	<p>The additional growth in the District should be aiming to provide new homes to meet Oxford's unmet needs in location/s that:</p> <ul style="list-style-type: none"> - are well related to Oxford, where the need for the new homes arises; - have easy access to sustainable modes of transport; - are well connected to existing highway infrastructure; - provide suitable access for vehicles, cyclists and pedestrians; - connect to existing cycle and pedestrian networks; - preserve and enhance key environmental and heritage assets; - are in close proximity to existing and future sources of employment; - are close to existing leisure facilities; and - provide sufficient facilities and open space on site to meet the needs of future residents.

PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	5	<p>The focused Vision for meeting Oxford’s unmet need in Cherwell District should contain:</p> <ul style="list-style-type: none"> a) a clear commitment to meet Oxford’s unmet housing need in full in combination with the other Oxfordshire local authorities; b) a commitment to deliver the growth of the Oxford urban area in the most sustainable way; c) to achieve a review of the Green Belt that will sustain for the long term and safeguard the five purposes of the Green Belt; d) allows for the co-location of jobs and homes on an area-wide basis; and e) ensures that the day-to-day requirements of new residents in terms of facilities and services are either met on-site or in the local area.
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	6	<p>The area of search for the Partial Review document should focus on the area of Cherwell most closely related to Oxford i.e. north Oxford. This will enable housing sites to come forward at the closest point to where the need arises. The Colleges and OUP consider that in this context the land to the immediate north of Oxford – the ‘North Oxford Triangle’ – is particularly well suited and represents a highly sustainable and suitable location.</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	7	<p>The factors influencing the ‘area of search’ should include:</p> <ul style="list-style-type: none"> - maintaining the five purposes of the Green Belt; - establishing new boundaries for the Green Belt that will sustain for the long term; - access to sustainable transport modes; - availability of adequate highway capacity and site access; - relationship of site to the Oxford urban area and proximity to Oxford; - proximity to sources of employment; - proximity to existing facilities and services including leisure, education, retail, health; - environmental constraints and opportunities; and - relationship with already permitted/allocated sites.
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	8	<p>The ‘area of search’ for the Partial Review should be well related to Oxford City to ensure that it provides sustainable development that serves Oxford’s housing demand. Only if all suitable and deliverable sites close to Oxford have been appraised, and allocated where appropriate, should sites further from Oxford be considered.</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	9	<p>As stated above, in deriving the figure of 15,000 new homes it has been assumed that all the urban capacity in Oxford has been accounted for. After that, the most sustainable and appropriate location to meet the needs of Oxford is on the edge of the City. There is no land on the edge of the city that is not constrained by Green Belt as the designated ‘Safeguarded Sites’ at Barton and Northern Gateway are now allocated/consented for development. Sites on the edge of the city will therefore inevitably require a review of the Green Belt. On this basis, an area of search based on the Green Belt is a logical approach, albeit with a focus on the inner boundaries of the Green Belt adjoin the built-edge of the city.</p>

PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	12	<p>In accordance with national policy and specifically the ‘duty to cooperate’ (NPPF, paragraph 178), Cherwell is required to work with other authorities in the county to determine the appropriate contribution it should make towards meeting Oxford’s unmet housing need. A number of sites or broad locations, which are deliverable and developable, therefore need to be identified in order to achieve this aim. In addition, the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p>In the Cherwell context, sites will need to meet the strategic objectives for housing and for building sustainable communities in Cherwell as set out in the Local Plan Part 1. The North Oxford Triangle site is suitable in this context given that the development of the site will:</p> <ul style="list-style-type: none"> - preserve a ‘gap’ between Kidlington and Oxford; - establish new Green Belt boundaries that will be robust and sustain for a long period; - be large enough such that a mix of housing types and tenures could be provided; - be close to existing services and facilities on the edge of Oxford; - have access to sustainable transport routes and transport infrastructure; and - provide essential new facilities and services on site. (cont...)
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	12	<p>(cont...) The housing market issues at Oxford identified from the Oxfordshire SHMA 2014 emphasise that the strongest housing demand pressures in Oxfordshire are in Oxford. It also sets out the particular housing trends and requirements within Oxford. A large site close to Oxford will serve the Oxford–focused sub regional housing market and provide a range of types and tenures of housing to meet Oxford’s needs.</p> <p>In terms of the geographic context, a site to the north of Oxford would be well related to existing transport infrastructure and planned infrastructure improvements, to the existing residential centres of Cutteslowe, Summertown and Wolvercote and to planned development at the Northern Gateway Site.</p> <p>It is clear that the area north of Oxford – the North Oxford Triangle - is particularly well located to contribute to meeting the unmet housing needs of Oxford.</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	14	<p>Specific objectives that Cherwell Council should consider when identifying sites for meeting housing needs arising within Oxford are that they should:</p> <ul style="list-style-type: none"> - be well related to Oxford; - have easy access to sustainable modes of transport; - be well connected to existing highways and other transport infrastructure; - provide suitable access for vehicles, cyclists and pedestrians; - link with existing cycle and pedestrian routes; - offer opportunities to preserve and enhance key environmental and heritage assets; - be close to existing and future sources of employment; - provide links to existing leisure facilities; - provide sufficient facilities and open space on site to serve the needs of future residents; and - provide a mix of housing types and tenures to meet Oxford’s housing requirements.

PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	15	<p>Please refer to separate site submission form for the North Oxford Triangle.</p> <p>Given its high sustainability credentials, the North Oxford Triangle should be allocated as a strategic housing site to meet Oxford's unmet needs. The site provides an opportunity to make a significant contribution to Oxford's unmet housing needs in a highly sustainable location close to Oxford.</p> <p>The site is close to existing sustainable transport links including Oxford Parkway Station, Water Eaton P&R and Peartree P&R. There is a real opportunity to provide a new neighbourhood for Oxford that has excellent sustainable transport links both locally and with the wider highway and rail network. The site is also adjacent to Oxford Road which is a 'Premium Transit Route' into Oxford and is well placed to benefit from the committed infrastructure improvements in North Oxford set out in the Oxford Transport Strategy. There are also various connections that can be made via existing vehicle, cycle, and pedestrian routes to maximise the options for movement to and from the site.</p> <p>The site is well placed to provide access to local jobs at sites such as the Jordan Hill Business Park to the south, future provision at the Northern Gateway site and employment opportunities in Oxford and Kidlington. (cont...)</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	15	<p>(cont...) There are a number of leisure and recreation facilities that can be easily accessed from the site including Cutteslowe Park, the Five Mile Drive Recreation Ground and the Banbury Road North Sports Ground. There is potential to provide links to and enhance Cutteslowe Park.</p> <p>The site is well related to Oxford and existing communities to the south of the site.</p> <p>The scale of the site means that it has the potential to provide a significant number of new homes to contribute towards meeting Oxford's unmet housing needs. In addition, the site is capable of providing for the day-to-day needs of the local community in terms of open space, primary level schooling, an element of local shopping as well as some additional employment opportunities.</p> <p>There are no significant environmental constraints that would prevent the site being utilised for the delivery of a highly sustainable new neighbourhood for Oxford.</p> <p>In conclusion the site is particularly well suited to meet Oxford's unmet housing needs. Furthermore, the owners of the site are willing for it to be delivered for development should the Council agree with this analysis and allocate it through the Partial Review process.</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	19	<p>The North Oxford Triangle is well located to take advantage of and enhance green, social, community and service infrastructure. Benefits of the site include:</p> <ul style="list-style-type: none"> - proximity to recreational facilities including Cutteslowe Park, the Five Mile Drive Recreation Ground and the Banbury Road North Sports Ground; - potential to provide additional green infrastructure links into Cutteslowe Park and the wider countryside; and - opportunities to provide infrastructure on site, such as a new school and extending the local pedestrian and cycle network.
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	28	<p>Site submission - North Oxford Triangle, Kidlington. Please refer to the Site Submission Form for the North Oxford Triangle.</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	10+11	<p>The Oxfordshire Growth Board is due to make recommendations on the appropriate division of Oxford's unmet housing between the other Oxfordshire districts at its meeting in September 2016. The implications for five-year housing land supply should be carefully considered once the scale of the allocation to Cherwell has been determined.</p>

PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	13, 16-18	<p>The Partial Review cannot address the housing requirements of Oxford in isolation. The provision of housing on the scale required will have implications for the wider area that will need to be considered alongside the allocation of sites for housing. One key area for consideration is transport and in this regard the County Council has prepared a Local Transport Plan that considers the long term strategy for achieving access to Oxford, which includes to the north of Oxford where the following measures are proposed:</p> <ul style="list-style-type: none"> - improvement to the A40 from Eynsham to Oxford; - implementation of Premium Transit Routes and potential Rapid Transit System between Kidlington and Oxford; and - P&R at locations remote from Oxford. <p>The Partial Review should consider these wider transport issues as part of bringing forward strategic sites on the edge and near to north Oxford.</p> <p>In the context of transport issues, the North Oxford Triangle is particularly well located given its proximity to the Oxford Parkway Station, Water Eaton P&R and the high quality bus services that operate along Oxford Road. The site therefore represents a highly sustainable solution for meeting housing needs close to Oxford.</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	20+21	<p>The key economic issue that will need to be addressed is to ensure that any identified site is deliverable. The delivery of the North Oxford Triangle is supported by the landowners (should it be allocated by the Council) and given its proximity to existing infrastructure there is not a requirement for any major investment in infrastructure improvements in order for it to be delivered. The site is therefore available and deliverable and represents a highly sustainable option.</p> <p>In terms of wider economic issues the scheme will make a positive contribution to the local economy in a number of ways, including: providing employment during the construction phase, increasing spend in the local economy, easing housing affordability in Oxford, enhancing the viability of existing bus services on Oxford Road and train services at Water Eaton.</p> <p>Furthermore, the location already benefits from the availability of local employment, at the Jordan Hill Business Park to the south. It would also provide an opportunity to access future employment opportunities at the Northern Gateway. It is close to Oxford, which is the main economic centre of the county, and to Kidlington where there are also a range of employment opportunities. There is also potential to provide an element of new employment at the site to benefit from proximity to the train station providing access to London.</p>
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	22+23	<p>This submission has already identified the sustainability credentials of the North Oxford Triangle, including:</p> <ul style="list-style-type: none"> - access to local jobs and services to reduce the need for travel and minimise related CO2 emissions; - access to a choice of sustainable transport modes when travel is necessary; - meeting the need for homes near to where that need arises; - protection and enhancement of habitats; - protection of existing heritage assets; - potential to enhance the cycle and pedestrian network; and - potential to extend the green infrastructure network. <p>In addition to these points already referred to, the eastern edge of the site is defined by the River Cherwell and its flood plain. This feature provides a long term boundary for development and an appropriate feature to define the edge of the redefined Green Belt. The layout and design of the scheme will factor in the presence of the flood plain so as not to increase flood risk on site or elsewhere.</p> <p>Furthermore, there is a commitment to design the scheme to a high standard both through built elements and green infrastructure.</p>

PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	24+25	As part of the analysis of the sustainability of any strategic site options, the potential impacts on habitat and species of importance should be taken into account. The North Oxford Triangle does not contain any significant landscape features or ecological habitats that would constrain development of the site. In addition, it is some distance from the designated ecological sites within the surrounding area.	
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press	26+27	As part of the analysis of the sustainability of any strategic site options, the potential impacts on heritage assets should be taken into account. The North Oxford Triangle contains no listed structures or other features of heritage value. There are two Listed structures (St Frideswides Farmhouse and Wall approximately 10m to north east of St Frideswides Farmhouse) beyond the site boundary on its eastern extent. Whilst careful design of the scheme is required to respect these Heritage Assets they will not significantly impact on the ability to deliver a comprehensive overall proposal for the site.	
PR-A-067	Savills / Christ Church, Exeter College, Merton College and Oxford University Press			The section of the report relating to 'Relationship between the Cherwell Local Plan Part 1 Review and other plans and programmes' does not refer specifically to Neighbourhood Plans. Such documents are part of the development plan and warrant attention on that basis when assessing spatial strategy options. Whilst referring to the Strategic Economic Plan, the document does not refer to the 'refresh' of this document which is currently underway and is likely to be concluded before the Partial Review has been completed.
PR-A-068	Savills / Christ Church, Exeter, Magdalen, Merton and St.John's Colleges	1	The figure of 3,500 homes is derived from the work of the Oxfordshire Growth Board and represents a simple piece of arithmetic whereby 15,000 homes (the working assumption for Oxford City's unmet need) is divided on a more-or-less equal basis between the 4 adjoining local authorities. In many ways this is an unsatisfactory approach to deriving a guideline figure as it fails to take account of a wide range of technical and environmental factors that will ultimately determine what the appropriate division of the 15,000 shortfall should be between the local authorities of Oxfordshire. (cont...)	
PR-A-068	Savills / Christ Church, Exeter, Magdalen, Merton and St.John's Colleges	1	(cont...) The Oxfordshire Growth Board is currently in the process of testing a range of strategic options for the spatial distribution of Oxford's unmet housing need. According to the reports submitted to the Growth Board meeting on 2nd February 2016, the analysis of strategic options is due to be concluded in September 2016. Given the fact that Cherwell District immediately adjoins the urban area of Oxford it has the potential to contribute towards meeting the housing needs of Oxford in a very sustainable way i.e. meeting the need close to where it arises. It is therefore likely that the figure of 3,500 homes is an underestimate of the proportion of Oxford's housing need that should be met in Cherwell. Further stages of the Partial Review should therefore await the conclusion of the Oxfordshire Growth Board analysis of strategic options.	
PR-A-068	Savills / Christ Church, Exeter, Magdalen, Merton and St.John's Colleges	3	The key consideration in deciding where to accommodate the unmet housing needs of Oxford is to seek to meet that need as close as possible to where it arises. This approach does determine that sites on the edge of the city, and therefore within the Green Belt, are to be preferred (on the assumption that the urban capacity of Oxford has been fully utilised). This requires that the necessary 'exceptional circumstances' are established to justify a review of the Green Belt as required by the Framework at paragraph 83. The University & Colleges maintain that 'exceptional circumstances' do exist, including the following: - the national and local imperative to deliver higher housing numbers and economic growth; - persisting jobs-homes imbalances in the local area; - poor housing affordability and a backlog of need; - worsening traffic congestion in and around Oxford as a result of in-commuting to the city; (cont...)	

PR-A-068	Savills / Christ Church, Exeter, Magdalen, Merton and St.John's Colleges	3	<p>(cont...) - staff recruitment and retention problems for local employees due to housing affordability, including meeting the needs of University and College employees for whom there is a pressing need for accommodation;</p> <ul style="list-style-type: none"> - a lack of realistic alternatives to focusing growth at Oxford; and - a lack of capacity to accommodate all of Oxford's housing needs within the city. <p>With the 'exceptional circumstances' case established, the review of the Green Belt should be informed by an analysis of the extent to which land currently in the Green Belt contributes towards its five purposes as defined in the Framework at paragraph 80 as well as a sustainability assessment of the identified strategic sites. The University & Colleges anticipate that the sustainability issues will be taken into account in the analysis of strategic options that the County Council is currently undertaking on behalf of the Growth Board and which will be reported to the Board in September 2016.</p>
PR-A-068	Savills / Christ Church, Exeter, Magdalen, Merton and St.John's Colleges	4	<p>The additional growth in the District should be aiming to provide new homes to meet Oxford's unmet needs in location/s that:</p> <ul style="list-style-type: none"> - are well related to Oxford, where the need for the new homes arises; - have easy access to sustainable modes of transport; - are well connected to existing highway infrastructure; - provide suitable access for vehicles, cyclists and pedestrians; - connect to existing cycle and pedestrian networks; - preserve and enhance key environmental and heritage assets; - are in close proximity to existing and future sources of employment; - are close to existing leisure facilities; and - provide sufficient facilities and open space on site to serve the needs of future residents.
PR-A-068	Savills / Christ Church, Exeter, Magdalen, Merton and St.John's Colleges	5	<p>The focused Vision for meeting Oxford's unmet need in Cherwell District should contain:</p> <ol style="list-style-type: none"> a) a clear commitment to meet Oxford's unmet housing need in full in combination with the other Oxfordshire local authorities; b) a commitment to deliver the new growth in the most sustainable way; c) to achieve a review of the Green Belt that will sustain for the long term and safeguard the five purposes of the Green Belt; d) allows for the co-location of jobs and homes on an area-wide basis; and e) ensures that the day-to-day requirements of new residents in terms of facilities and services are either met on-site or in the local area.
PR-A-069	R James	22	<p>I am not at all happy that Kidlington appears to be undergoing rapid and rather idiotic speculative developments. Multiple occupancy dwellings are now replacing many large houses around the village; a house at the corner of Springfield Road is being turned into flats.</p> <p>The proposed huge unwelcome addition of flats instead of the Cooperative car park is another sign that there is absolutely no care or long term thinking being put into how the village is going to remain just that, and have any sort of charm, and identity.</p> <p>Disrupting the communities, which have lived in the village for many years, is very poor policy for ensuring crime, social cohesion and harmony remain the stalwart features of this established village. (cont...)</p>

PR-A-069 R James

1 (cont...) From the documents I have had chance to go over, I don't think that Cherwell should be considering allowing an extra 3,500 extra houses to meet Oxford's housing issues. This figure is derived from the Oxfordshire SHMA which has simply been accepted by the Council and not subjected to serious independent scrutiny. The SHMA was drawn up by private consultants who largely work for the development industry and therefore have a conflict of interest. Its figures are much too high, far in excess of previous trends and clearly unrealistic. I do not accept that the SHMA figures represent either Cherwell's or Oxford's needs.

With regard to the issue of whether additional housing in Cherwell be allowed to meet Oxford's needs be supported by additional employment generating development, that again doesn't stand up to scrutiny. (cont...)

PR-A-069 R James

16 (cont...) The transport system in Kidlington simply cannot cope with more cars. Currently the roads are backed up for 2-3 hours per morning with incoming traffic getting through to Oxford and the A34. It is ridiculous to think the area should be expanded in terms of housing and development as the roads cannot cope with more traffic.

Further the addition of the train station is going to add to the road issues for the foreseeable future. Without building any extra homes, there is going to be more people trying to get through Kidlington in rush hours. Therefore it is imperative that clear, strategic thinking is used to consider what the local area needs. (cont...)

PR-A-069 R James

22 (cont...) Kidlington's green belt needs protecting desperately. With the new train station massive erosion has been achieved in the boundaries between Oxford and Kidlington. Gosford is under severe threat of now being urbanised, and as we have severe flood issues in the village and area, this is madness.

The reason Oxfordshire has been such a pleasant county to live in is because it has greenbelt and spaces between urban conurbations. The ill conceived developments around Barton and Peartree are going to ruin Oxford's charm; as a Kidlington resident, I know very well that part of the village's appeal is precisely that – it is a village, with greenbelt around it.

We do not want or need excess housing, particularly if it is not linked to social need and sustainable, green development initiatives.

I urge further detailed and intelligent consideration of Kidlington's future by everyone involved in this process.

PR-A-070 Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	1	<p>The 2014 Oxfordshire Strategic Housing Market Assessment (SHMA), which covers the five Oxfordshire Authorities (Cherwell District, Oxford City, the Vale of White Horse District, South Oxfordshire District and West Oxfordshire District) considers that the objectively assessed need (OAN) for Oxford City is between 1,200 and 1,600 dwellings per annum. The Issues consultation document suggests that it is appropriate to consider the mid-point of this range as the objectively assessed housing need, which equates to 28,000 dwellings across the Plan Period to 2031.</p> <p>However, Paragraph 47 of the National Planning Policy Framework (NPPF) requires local planning authorities to ‘boost significantly’ the supply of housing. In this context, it is considered that the upper limits identified within the SHMA should be considered as appropriate, rather than the mid-point. In this context, Oxford City should be providing 1,600 dwellings per annum to 2031, which equates to a housing target of 32,000 dwellings across the Plan Period.</p> <p>It has been agreed by the five Oxfordshire Authorities that the ‘working assumption’ of Oxford City’s unmet housing need is 15,000 dwellings. However, Oxford City’s Strategic Housing Market Assessment (SHLAA) only identifies a supply of 10,212 dwellings, including completions since 2011, windfalls, student accommodation, C2 units and SHLAA sites. Even against an overall target of 28,000 dwellings, this leaves a shortfall of 2,788 dwellings. Against a target of 32,000 dwellings (based on the SHMA upper limit), there would be a shortfall of 6,788 dwellings. As such, it is not considered that the Oxfordshire Authorities are planning to meet the objectively assessed housing need of the whole housing market area, in accordance with the second bullet point of Paragraph 47 of the NPPF. (cont...)</p>
PR-A-070 Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	1	<p>(cont...) Based on the ‘working assumption’ of Oxford City’s unmet housing need of 15,000 dwellings, Cherwell District are proposing to consider accommodating 3,500 dwellings of the unmet housing need as a starting point. This has derived from an assumption that each of the five Oxfordshire Authorities will accommodate an equal proportion of Oxford City’s unmet housing need (i.e. 3,000 dwellings). However, this assumes that Oxford City will be contributing 3,000 dwellings of their own unmet housing need, which is illogical. Rather, the City’s unmet housing need should be split between the remaining four Oxfordshire Authorities, which provides a starting point of 3,750 dwellings per authority, assuming an equal split. The figure rises to 4,447 if Oxford City’s full target of 28,000 dwellings is to be accounted for; and 5,447 dwellings per authority if Oxford City’s upper housing target is considered. Table provided in representation.</p>
PR-A-070 Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	1	<p>(cont...) Cherwell have proposed to increase their 3,000 starting point by 500 dwellings to 3,500 dwellings in case the county wide housing need increases, or to take account of differences between the sustainability options of each authority in meeting the unmet need. However, it is not considered that this uplift goes far enough. Indeed, whilst it is acknowledged that Cherwell is partly constrained by Green Belt to the south, the three other authorities surrounding Oxford City are also constrained by Green Belt. In addition, large areas of the Vale of White Horse, West Oxfordshire and South Oxfordshire Districts are also covered by Areas of Outstanding Natural Beauty (the Cotswolds, the Chiltern Hills and the North Wessex Downs), further constraining their ability to accommodate unmet housing need from Oxford City. Of the four authorities, Cherwell is considered to be the least constrained, and therefore capable of accommodating more of Oxford City’s unmet housing need.</p> <p>Given the above, it is considered that 3,500 dwellings is not an appropriate ‘working assumption’ for the amount of Oxford City’s unmet housing need which is likely to need to be accommodated within Cherwell District. This figure needs to be increased, as it is not considered that it is in accordance with Paragraph 47 of the NPPF, either in its aspirations to boost significantly the supply of housing, or to ensure that the full objectively assessed housing needs of the full housing market area are met. (cont...)</p>

PR-A-070 Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	1	<p>(cont...) In addition to meeting the unmet housing need arising from Oxford City, consideration should also be afforded to how Oxfordshire, and in particular Cherwell District might be required to assist in meeting the unmet housing need arising from London. The London Plan (March 2015) outlines a requirement for 49,000 dwellings per annum to be delivered across the city. However, the Plan only makes provision for the delivery of 42,000 dwellings per annum. This leaves a significant residual shortfall. It is clear that the South East authorities will need to contribute towards meeting this shortfall, however the distribution is currently unknown.</p> <p>In March 2014, the GLA wrote to Bedford Borough Council, advising that there is likely to be a 'gap' between the demand and supply of housing in London. As a result, the letter advised that "Planning authorities in the wider South East with housing markets that are influenced by that of London are strongly advised to take account of these uncertainties when addressing National Planning Policy Framework Paragraph 47. This requires authorities to boost significantly the supply of housing by using their evidence base to ensure that their local plan meets full objectively assessed needs." (cont...)</p>
PR-A-070 Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	1	<p>(cont...) Cherwell District is well placed to meet some of the unmet housing need arising from London, particularly given the excellent transport links to the city, including a regular direct train service from Banbury which takes approximately one hour.</p> <p>Given that Cherwell need to review their Local Plan to accommodate some of the unmet housing need of Oxford City, it is also considered a good opportunity to afford consideration as to how Cherwell District might assist in accommodating some of the unmet housing need arising from London.</p>
PR-A-070 Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	6	<p>The land surrounding Oxford City is Green Belt. As detailed above, this Green Belt extends into all of the four surrounding Districts. The Oxfordshire Growth Board published a Green Belt Study to understand whether Oxford City's unmet need can be met within the surrounding Green Belt.</p> <p>The potential of a number of parcels of land for release from the Green Belt to accommodate Oxford City's unmet housing need were considered against the five purposes of the Green Belt. The Study does not make any recommendations regarding the suitability of individual parcels for release from the Green Belt.</p> <p>The adopted Cherwell Local Plan (July 2015) identifies Banbury and Bicester as the most sustainable settlements and the focus for new growth across the Plan Period. Whilst Kidlington is identified as an urban area within the Local Plan, it is also identified as one of 16 Category A Villages. As such, it is considered to be a less sustainable location for new development than Banbury or Bicester. (cont...)</p>
PR-A-070 Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	6	<p>(cont...) Given that the settlements which are identified as the most sustainable within the District are located further away from Oxford City, it is not considered that the 'area of search' should be constrained geographically to the area closest to Oxford City.</p> <p>The more sustainable settlements within Cherwell District are well related to Oxford City in terms of connectivity. There are regular bus and rail services connecting Banbury with Oxford City Centre. Most train services take less than 20 minutes. Banbury is located close to Junction 11 of the M40 allowing convenient access to Oxford City's park and ride schemes.</p>

PR-A-070	Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	8	<p>It is considered that a District wide approach to reviewing appropriate locations for accommodating Oxford City's growth would be the most appropriate approach.</p> <p>As detailed in our response to Question 6, the most sustainable settlements within the District are not necessarily the closest to Oxford City spatially. However, Banbury in particular is closely linked through the highway and public transport networks. The adopted Cherwell Local Plan identifies that the majority of new development across the Plan Period will be directed to Banbury and Bicester. Given that this is the adopted strategy for Cherwell District, it is considered that any additional development required to meet Oxford City's unmet housing need is accommodated in accordance with this.</p> <p>Paragraph 17 of the NPPF sets out 12 Core Planning Principles, including encouraging the redevelopment of brownfield land over greenfield sites. This principle is also advocated within the adopted Cherwell Local Plan. The Government have made it clear that brownfield regeneration will be a priority in delivering new homes, and in a Statement released on 10th March 2016, Communities Secretary Greg Clark urged Councils to continue to offer up brownfield sites to deliver new homes. (cont...)</p>
PR-A-070	Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	8	<p>(cont...) It is noted that Cherwell District is one of 15 Authorities taking part in the 'brownfield register' pilot scheme, which will assist in the redevelopment of brownfield sites. The 15 Authorities have been chosen because they have the most brownfield land in England.</p> <p>Given the emphasis on brownfield sites delivering housing need, particularly within Cherwell District, and the significant availability of brownfield land within the District, it is considered that there should be a focus on utilising this brownfield land to deliver the additional housing growth required to accommodate Oxford City's unmet housing need.</p> <p>Whilst a District wide approach to reviewing appropriate locations for accommodating Oxford City's growth would be the most appropriate, this needs to be considered in the context of the spatial strategy for the District set out within the adopted Local Plan, as well as the principles of brownfield redevelopment established at both a national and local level.</p>
PR-A-070	Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	9	<p>As detailed in our response to Question 8, a District wide to the 'area of search' is supported. However, this needs to be considered in the context of the spatial strategy for the District established within the adopted Local Plan, which seeks to direct the majority of new housing growth to the more sustainable settlements of Banbury and Bicester. Given this established strategy for growth, it is not appropriate to consider an area of search based solely on the Oxford Green Belt.</p>
PR-A-070	Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	15	<p>It is not considered that options for meeting Oxford City's unmet housing need should rely solely strategic allocations of a significant size. By distributing the required growth across the most sustainable locations within the District, any adverse impacts of accommodating this growth on the environment and local services and infrastructure will also be more evenly distributed.</p> <p>In terms of locations for growth, as detailed above, sustainable locations within and adjacent to Banbury should be considered, given that it is identified as one of the two most sustainable settlements within the District with good public transport links to Oxford City.</p> <p>Land at Southam Road, Banbury has been submitted to the Call for Sites consultation as a suitable location for meeting some of the additional growth required. The Call for Sites submission demonstrates that the Site is sustainable, available and deliverable and as such, offers a practical solution to meeting some of Oxford City's unmet housing need.</p>
PR-A-070	Barton Willmore / Hundred Percent Hella and Orbit Homes (2020) Ltd	28	<p>Site submission - Land at Southam Road, Banbury</p>

PR-A-071	Pegasus Group / Richborough Estates	1	<p>As noted in Paragraph 2.16 of the Issues Consultation document an agreed figure of 15,000 dwellings is the level of need that cannot presently be met by Oxford City Council. Distributing these evenly between the five authorities in the Oxfordshire Housing Market Area would give a figure of 3,000.</p> <p>Paragraph 2.17 notes that this figure may potentially increase for the rural districts if Oxford's contribution were to be less than 3,000. This is considered to be highly probable given the environmental constraints within Oxford City's administrative boundary (namely the significant wealth of heritage assets and flood plain) coupled with the Green Belt surrounding the City, all of which limit the availability of both urban and rural housing land.</p> <p>The 3,500 homes for Cherwell is therefore likely to be a conservative estimate, given that much of Cherwell District lies beyond the Green Belt, has good connectivity with Oxford and beyond, and opportunities exist for allocating sites to assist in meeting Oxford's unmet housing need.</p>
PR-A-071	Pegasus Group / Richborough Estates	3	<p>Key issues for Oxford are considered to be the protection and enhancement of the built and natural environment, and in particular the retention of the historic setting and form of the City, which contributes to its special character. Allied to this is the scarcity of previously developed land within the City's administrative boundaries, which limits the capacity of the City in making a significant contribution to meeting unmet housing need.</p> <p>In addition the designation of some 27% Oxford's area as Green Belt also limits housing opportunities and thus consideration should be given to the issue of the extent to which land performs against the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF). Regard should therefore be had to the 'Oxford Green Belt Study' of October 2015. However, in helping to meet development requirements it is likely that the amount of land where exceptional circumstances can be demonstrated to justify a release from the Green Belt may be limited.</p> <p>These issues highlight the need to consider opportunities for housing growth in the administrative areas adjoining Oxford and in particular the need to consider areas beyond the Green Belt.</p>
PR-A-071	Pegasus Group / Richborough Estates	6	<p>It is noted that distance / proximity to Oxford (e.g. the southern part of Cherwell or an area close to the City) is highlighted in paragraph 4.8 of the Issues Consultation document as one of the factors that might help define an 'area of search'.</p> <p>This approach is supported, especially given that the southern part of Cherwell District has a more direct relationship with Oxford than other parts of the District. The more removed housing land is from Oxford the more likely it is that distances travelled will increase, meaning less sustainable locations and a greater contribution to climate change. (cont....)</p>
PR-A-071	Pegasus Group / Richborough Estates	6	<p>(cont...) Launton is a village lying to the east of Bicester, just on the other side of the A4421. It is a sustainable settlement located in the Southern part of Cherwell District, outside the Green Belt and only 15 miles from Oxford. The sustainability of Launton and its suitability to deliver housing has been recognised through the fact that the Cherwell Local Plan Part 1 defines it as a Category A village, which are to contribute 750 homes towards meeting Cherwell's housing requirements.</p> <p>It is therefore considered that it may be more appropriate to focus the 'area of search' on the southern part of Cherwell District, encompassing the village of Launton. Furthermore, land at Grange Farm, Launton is entirely suitable as a Local Plan Part 2 housing allocation and the benefits of this site are set out further under Question 28.</p>

PR-A-071	Pegasus Group / Richborough Estates	7	<p>As has been explained above the 'area of search' or plan area may be more appropriately focused on the southern part of Cherwell District. Consideration should be given to a range of economic, social and environmental factors in determining the 'area of search'. Examples of factors that might help define an 'area of search' are set out in paragraph 4.8 of the Issues Consultation, and these are considered appropriate.</p> <p>Particular attention is drawn to the factors of distance /proximity to Oxford, key transport corridors and the Cherwell settlement hierarchy. It is contended that Launton, as Category A village, close to the A4421 and located 15 miles from Oxford, should fall within this 'area of search'.</p>
PR-A-071	Pegasus Group / Richborough Estates	8	<p>As it is considered that the southern area of the District may be more appropriate for the 'area of search', a district-wide area may be less suitable. The area in the south of the district is better related to Oxford, whilst the northern area relates more to Banbury and would be less sustainable in meeting the housing needs of Oxford.</p>
PR-A-071	Pegasus Group / Richborough Estates	9	<p>Approximately 14% of Cherwell District lies within the Oxford Green Belt and thus ample opportunities exist for areas beyond the Green Belt to serve some of Oxford's unmet housing need. Therefore, whilst it is considered that areas within the Green Belt should be taken account of, it is also considered that the 'area of search' should not exclusively focus on the Oxford Green Belt. By definition these Green belt areas will no doubt be subject to constraint and therefore less suitable for development.</p>
PR-A-071	Pegasus Group / Richborough Estates	15	<p>The Council should be considering locations within or on the edge of sustainable settlements for the identification of strategic housing sites to meet Oxford's unmet needs. In particular the settlement hierarchy of the Cherwell Local Plan Part 1 should be utilised to inform this process, with locations at Category A Villages being considered; Launton being one such village.</p>
PR-A-071	Pegasus Group / Richborough Estates	28	<p>Site submission - Land at Grange Farm, Launton.</p>
PR-A-072	Brown & Co / Mr H.R.N Stilgoe	28	<p>Site submissions - Land at South Adderbury; Land at Berry Hill Road, Adderbury</p>
PR-A-073	A Lodwick	1	<p>No. It is based on the Oxfordshire SHMA which is a flawed document fatally compromised by the conflicts of interest of the private consultants (GL Hearn and SQW) who produced it. It has been widely criticised and you should take this into account including the evidence presented to you by a respected planning consultant (Prof Wenban-Smith).</p> <p>The SHMA figures for Oxford's needs are based on many dubious assumptions as I and others pointed out at the Cherwell EiP. They have not been included in any Oxford plan let alone tested at an EiP. They should not be used as the basis for reviewing Cherwell's Local Plan.</p> <p>This review provides an opportunity to correct the biases in the 2014 SHMA. You should undertake an independent review of the SHMA and its underlying employment forecasts by an organisation which is not compromised by its links to the development industry and the LEP.</p> <p>You should not add any further requirement to the already excessive figure of 22,700 homes. It will make it even more difficult for you to demonstrate a 5 year housing supply with the resulting damage to Cherwell's environment as speculative applications are permitted on appeal.</p>

- PR-A-073 A Lodwick 2 No. The employment generating development already proposed (or permitted) at Langford Lane, Kidlington, at Begbroke Science Park and just over the District boundary at the so-called Northern Gateway is already excessive. It is unlikely that there will be sufficient demand for the “high-tech” science-based industries sought given that there is already vacant development land and premises elsewhere around Oxford. The result will either be an over provision of land and/or the encouragement of lower-value businesses which is the opposite of what you are seeking to achieve.
- In addition, the hypothetical housing needs are themselves based on exaggerated forecasts of employment growth, which again, as was argued at your EiP, are unrealistic and based on the aspirations of the LEP. To provide for yet more employment generating development will simply fuel an unsustainable vicious circle.
- PR-A-073 A Lodwick 3 The City Council is encouraging employment generating developments, such as the Northern Gateway for which the demand is not proven and then using such developments to fuel demand for housing and house prices (which it then complains about!).
- The City Council is incapable of providing any rational analysis or forecasts of the outcomes of its expansionist policies. A separate, democratically accountable and independent, strategic planning body with the necessary expertise should be established for the County.
- Growth should be diverted away from the City. For example, Oxford Brookes University could be gradually located to Bicester. This would both benefit Bicester, the University and Oxford. Oxfordshire should consider economic twinning with specific locations in regions which would particularly benefit from growth and where land is available and housing less expensive. The availability of high speed internet links makes it more feasible than ever for businesses – particularly those in the knowledge and ‘high-tech’ sectors - to operate at geographically dispersed locations.
- PR-A-073 A Lodwick 6 No. Growth in general should be directed away from Oxford both within and beyond the County as argued under Q3.
- PR-A-073 A Lodwick 9 No.
 Planning guidance makes clear that
 - Green Belt should be permanent
 - housing and economic needs do not override constraints on the use of land, such as Green Belt. - this may mean that an authority is in fact unable to meet its ‘objectively assessed needs’.
- Cherwell appears to have made no attempt to take into account the effect of the Green Belt (and other constraints) on its ability to provide for ‘objectively assessed need’. The Review of the Local Plan provides an opportunity to put right this shortcoming.
- Furthermore, the Government has made an explicit commitment to protect the Green Belt.
- Green Belt is much valued by local residents, makes an important contribution to the area’s natural capital, and should be improved as an asset in its own right and not built upon. (cont...)
- PR-A-073 A Lodwick 9 (cont...) Paragraph B253 of the Cherwell Local Plan says "The Oxford Green Belt was designated to restrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area." As I said at the EiP I support this statement strongly. Planning policy should therefore seek to direct development away from the city, both within and beyond the county boundaries.
- The recent Green Belt study is therefore fundamentally flawed by ignoring the fact that all land parcels within the Green Belt contribute to the over-riding purpose (in the case of Oxford and similar historic cities) of preserving the setting and character of Oxford. The five purposes are alternatives which apply differently to individual towns and cities. They were never intended to be used for assessing individual parcels of land.

PR-A-073	A Lodwick	16	<p>Transport networks around Oxford are already overstretched. Oxfordshire County Council's statements, particularly with regard to modal shift, are naively (or perhaps) highly over-optimistic. The schemes currently proposed will not even solve existing problems while the additional developments proposed (including the 3500 homes) will make matters much worse. The forecasts apparently being used do not inspire any confidence. For example it became clear at the Northern Gateway EiP that high figures were being used for employment generation, and then translated into high forecasts of housing need, while very much lower figures were being used for forecasting travel demand. Again this review presents an opportunity to re-visit these inconsistent and excessive forecasts and scale back the level of proposed development.</p>
PR-A-073	A Lodwick	24	<p>Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will further damage the natural environment of Cherwell and its natural capital, of which the Green Belt is a major component.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	1	<p>It is regrettable that the work which has been undertaken by the Councils and the Oxfordshire Growth Board so far has not progressed sufficiently to enable a clearer view of Oxford's unmet housing need to be identified compared with the Strategic Housing Market Assessment (SHMA) requirements.</p> <p>In the absence of an agreed figure, Oxford City Council has indicated that there would be capacity in the City for some 10,212 homes (2011/12 to 2030/31). The mid-point figure for Oxford in the SHMA, indicates that there is an unmet need for a further 17,788 homes (10,212- 28,000). (cont...)</p>
PR-A-074	JPPC / Tripartite and University of Oxford	1	<p>(cont...) Currently, Cherwell and Vale of White Horse Districts are proposing to meet their own objectively assessed housing needs (OAN) set out in the SHMA while the position in West Oxfordshire is that the SHMA figures have not been accepted (this is currently the subject of a suspended Examination into the Local Plan where the Inspector has asked the Council to review its proposed housing provision). The South Oxfordshire position is unclear.</p> <p>We support the Council in seeking to make provision for the unmet housing need. However, whilst we support moving forward as soon as possible (given the extent of unmet housing need), and hence the need for some working figure, the Council should consider this in the context of the lowest level of provision which should be accommodated rather than as a ceiling figure.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	2	<p>The NPPF makes clear that LPAs should "proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth". Paragraph 158 in the NPPF sets out that evidence and strategies for housing and employment in local plans should align with one another.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	2	<p>The housing forecast of the SHMA takes into account the need to provide for employment growth. Consequently, (cont...) I have noted in the introduction above that there is a need to provide for additional employment space at Begbroke Science Park both in relation to the needs which would arise up to 2031(see the comments in respect of Local Plan Part 2) but also for those beyond the plan period. The provision of housing close to the Science Park for both key worker housing and to meet general housing needs would ensure an integrated development where the need to travel could be minimised and where provision is able to be explored which could include park and ride facilities which are both car and railway based.</p> <p>Begbroke Science Park has been successful in supporting and encouraging close links between academic research and industry and the University sees that role continuing. The draft Masterplan which has been produced shows how land could be made available in the future associated with the Science Park. This could provide both for the needs up to 2031 (as part of the limited green belt review in the Part 2 Local Plan) as well as safeguarding land outside the green belt for the longer term.</p>

PR-A-074 JPPC / Tripartite and University of Oxford	3	<p>This question is oddly juxtaposed against comments included in the currently adopted Oxford Core Strategy. It is clear that the City is unable to accommodate all of the housing required to meet its OAN because of significant constraints as a consequence of flood areas; historic assets including listed buildings, conservation areas, and scheduled monuments and their settings; open areas which contribute significantly to the character of the City; and nature conservation assets.</p> <p>However, it is clear that in order to meet the unmet need for homes which cannot be accommodated in Oxford, there needs to be a measure of proximity to the City, which continues to be a provider of major employment in the county. (cont...)</p>
PR-A-074 JPPC / Tripartite and University of Oxford	3	<p>(cont...) It will be recalled that at the first session of the Examination of the draft Local Plan the Council instructed Montagu Evans to produce a report and this highlighted the likely market saturation which would occur with further housing developments in Banbury and Bicester. It also indicated that development would therefore need to occur more appropriately closer to Oxford. In the event, additional allocations have been made at Banbury, Bicester and Upper Heyford.</p> <p>Locations closer to Oxford are also likely to be more accessible to the City, minimising the impacts on the highway network.</p>
PR-A-074 JPPC / Tripartite and University of Oxford	4	<p>It is clear that in order to meet Oxford's unmet needs, the new homes should be well-related to the City (see comments above), the transport network and employment.</p> <p>The aims should be to create a place that is sustainable, provides for the community's needs for homes, that is long lasting and ambitious, offers a high quality of life, promotes healthy living and has access to employment opportunities, facilities and services nearby.</p> <p>It should foster research and development which would succeed in boosting the local economy both now and in the long term. (cont...)</p>
PR-A-074 JPPC / Tripartite and University of Oxford	4	<p>(cont...) The development required to meet those unmet needs should provide for affordable homes of a number of types and tenures which includes key worker housing. It should include provision for transport links into and out of Oxford which encourage other transport modes than car and explore whether provision is able to be made for a new station which could serve both the development and existing housing and employment areas.</p> <p>Lastly, new development should promote healthy living with green spaces, cycle and pedestrian networks with the aim to promote high standards of environmental sustainability.</p>
PR-A-074 JPPC / Tripartite and University of Oxford	16	<p>Good accessibility is essential for the University's continued success and position at the pinnacle of global academic achievement. Staff need to be able to commute and travel for business within and around the City easily and conveniently in a timely fashion. Many staff live outside the ring road and a large proportion within Cherwell District. This figure may increase as lack of affordable housing pushes staff out of the City and so good quality transport choices from outlying areas, especially Kidlington, Yarnton and Bicester are essential. Unfortunately transport is increasingly cited as a barrier to recruitment and retention of staff.</p> <p>Set against this context the University strongly requests that the Local Plan considers transport as a key factor in the location of new housing and employment developments, locating them as near to the City's boundary as possible and at new or existing public transport hubs to enable public transport and cycling to replace car borne trips. The alternative of dispersed housing at distance from Oxford generating car borne trips does not bear contemplation in terms of the negative impacts on congestion, carbon and air quality. (cont...)</p>

PR-A-074 JPPC / Tripartite and University of Oxford	16	<p>(cont...) The University wishes to emphasise the potential for transport accessibility from settlements in the South of Cherwell, especially Yarnton and Kidlington, into Oxford to be transformed through development of employment and housing at the Begbroke Science Park. Firstly, this would facilitate the goals of the Local Plan to accommodate Oxford's housing needs on the periphery of the City within easy access of Oxford's employment sites by sustainable transport modes. Secondly, by improving the quality and availability of public transport options this will help resolve some of the chronic congestion caused by car-borne commuter trips. This is especially relevant for Cherwell District as the second highest source of inbound commuters into Oxford.</p> <p>Specifically, as part of the Begbroke Science Park Masterplan for the University aspires to:</p> <ul style="list-style-type: none"> - Deliver a Park & Ride at Begbroke. The University supports the Highway Authority's plans to deliver additional park & ride sites within Cherwell to reduce the number of car trips into Oxford and has made representations for Begbroke Science Park to be assessed as a potential site. Given its proximity to the A44 corridor the site would intercept traffic coming from the North of Oxford and accommodate a park & ride in an appropriate setting, also serving an existing centre of employment. The improved connectivity to the Centre of Oxford would also enable business travel between the University's Science Area in Oxford and Begbroke, promoting economic growth and interaction on the knowledge spine between business and academia, enabling the commercialisation of academic research via spin-out start-up businesses based at the Science Park. The University would like to see this recognised in the Local Plan revision. (cont...)
PR-A-074 JPPC / Tripartite and University of Oxford	16	<p>(cont...) - Facilitate the delivery of Mass Transit on the A44 through the Begbroke Science Park via the travel demand generated by the fully built-out Masterplan which envisages up to 6,000 employees and 1,500 homes on-site in 2036. Public transport provision on the A44 needs to be improved to meet the requirements in the NPPF and the Local Plan for development to be located in areas that are or can be served by quality sustainable transport choices. This concentration of demand at Begbroke Science Park would enable the provision of high speed, high frequency mass transit services by the commercial bus operators that is needed to achieve a sustainable transport system connecting South Cherwell with Oxford. Located on a bus corridor the Begbroke Science Park Masterplan has the critical mass to sustain commercial bus services without the need for public subsidies.</p> <ul style="list-style-type: none"> - Implement a new railway station at Begbroke on the existing London-Oxford- Banbury-Birmingham mainline. This will include a station park & ride and has huge potential to meet travel demand generated by the Local Plan's housing needs in a sustainable location which would also serve the large settlement of Kidlington. - Upgrade traffic-free cycle routes into the city centre.
PR-A-074 JPPC / Tripartite and University of Oxford	17	<p>Begbroke Science Park scores very highly in terms of transport as a potential development location to meet Oxford's unmet needs. Given its location within 6 miles of the City centre, its proximity to the major existing bus corridor into Oxford and proposals to directly connect into the existing Oxford - Banbury rail corridor via a new station it can connect its residents and workers to Oxford, Banbury and other local centres via short bus and rail journeys. Crucially, the provision of office space for up to 6,000 employees, 1,500 homes and a large park & ride means the location will possess the passenger volume to justify commercial bus and rail operators to commence frequent and rapid services via Begbroke to and from Oxford. With the withdrawal of bus subsidies by Highways Authorities and the reduction in Bus Operators Service Grant by Central Government, possessing the critical mass of demand to justify commercial investment in mass transit is an essential pre-requisite for strong and long-lasting public transport alternatives to the car. (cont...)</p>

PR-A-074	JPPC / Tripartite and University of Oxford	17	<p>(cont...) Furthermore with the advent of quality, low cost electric bikes Begbroke Science Park lies within a 30 minute cycle ride of Central Oxford, presenting an enviable and more reliable journey-time compared to the car. An electric bike station, part of the Oxon bike automated bike sharing scheme is being delivered at the time of writing. The Canal towpath presents an underutilised resource that could be developed as improved green infrastructure to connect the location into Oxford by bike.</p> <p>Taken as a whole, the high potential for sustainable transport accessibility at Begbroke presents a sustainable location for the housing and employment development that Cherwell and Oxford require to unlock their potential for low carbon economic growth.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	20	<p>Economic Issues and how these would affect the potential development locations Paragraph 5.105 of the Issues Consultation sets out the reasons provided for the changes to the green belt agreed at the Northern Gateway. The broad issues are not dissimilar as to why the land around Begbroke Science Park represents an appropriate location to meet Oxford's unmet housing needs: employment exists at the Science Park and it would be expanded to meet economic imperatives, new housing nearby would assist in affordability and include key worker housing (reducing the need for travel outside), the site is able to be brought forward by landowners who have a long standing relationship and shared goals, and the site has good accessibility and the prospect of improving transport infrastructure.</p> <p>While Begbroke Science Park is being considered in the context of the Part 2 Local Plan, it is essential to consider the longer term growth prospects and the ability of the land around it to contribute to economic growth in the District beyond the current plan period unencumbered by green belt constraints. (cont...)</p>
PR-A-074	JPPC / Tripartite and University of Oxford	20	<p>(cont...) Getting transport and access right is central to successfully delivering low carbon economic growth. Unlocking accessibility by locating development in the right place where trips can be made by sustainable modes through new or existing hubs will support and enable economic growth. Given the very large numbers of Cherwell residents commuting into Oxford for work the Local Plan should locate new development at sites which can capture commuter car trips originating in Cherwell before they reach the City at Park & Ride hubs where they can seamlessly transition to the final leg into Oxford by bus and rail.</p> <p>To deal adequately with the volume of existing and likely trips generated by the scale of development in Oxfordshire, new hubs will be required in Cherwell. Begbroke Science Park is a very strong contender to site a new transport hub. As discussed in Q16 and Q17 the University proposes to host a new Park & Ride, new railway station and route mass transit via the site through the Masterplan which envisages 6,000 jobs and 1,500 homes by 2036. The site is appropriate to meet Oxford's unmet housing needs, would assist in meeting economic goals and would be located on main transport corridors and would be able to assist in delivering transport improvements.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	28	<p>Site submission - Begbroke Science Park. These representations are accompanied by a draft Masterplan for the site. The Masterplan incorporates that proposed in respect of the Part 2 Local Plan and shows how the overall development would be able to be accommodated acceptably. The Masterplan is in draft format only at this stage and further discussions with the Council and other stakeholders would be welcomed.</p>

PR-A-074	JPPC / Tripartite and University of Oxford	6-9	<p>The area of search needs to be well-related to Oxford as the need arises from its own unmet need for new homes. Such a relationship would also seek to avoid longer distance commuting in and out of Oxford due to the significant employment provision in the City.</p> <p>A number of factors are suggested in paragraph 4.8 of the Issues Consultation. Of those set out land at and around Begbroke Science Park has the advantage of being on a key transport route with opportunity to explore the provision of a station which could serve the new development and Kidlington. It is off A44 which is a premium route for public transport.</p> <p>The site is occupied in part by the Begbroke Science Park which is operated by the University and which has close connections with the University's educational, academic and research work in Oxford. The expansion of the Science Park has been accepted in the Local Plan Part 1 and a limited review of the green belt is to be undertaken. The site offers the opportunity to co-locate housing and employment, which would have advantages in potentially reducing commuting by private car. (cont...)</p>
PR-A-074	JPPC / Tripartite and University of Oxford	6-9	<p>(cont...) The site is on the edge of Kidlington which is the largest settlement outside the towns in the district with a higher level of services and facilities. Infrastructure improvements could assist those living in the village, for example by providing access to a new station on the railway line which runs to the west of Kidlington and park and ride facilities off A44 to reduce the number of private cars travelling into Oxford and intercept them at an earlier point on the transport network.</p> <p>The green belt itself is too wide an area of search and any new development would be more appropriately located close to existing settlements in the Kidlington, Begbroke and Yarnton area close to main existing transport infrastructure (and in which respect improvements can be provided). In this location, there would be least impact on the purposes of the green belt.</p> <p>It is acknowledged that the NPPF indicates that green belt boundaries should only be altered in exceptional circumstances. The scale of the unmet housing need and the social and economic problems which would arise by not making provision close to Oxford provide an exceptional reason to review the green belt on a strategic basis. It has endured for many years without any significant change and we believe that there is broad support for such a review to be undertaken. A local plan review is the appropriate mechanism for such a review of the green belt. (cont...)</p>
PR-A-074	JPPC / Tripartite and University of Oxford	6-9	<p>(cont..) We note that reference is made to the Green Belt Study undertaken by LUC on behalf of the Oxfordshire Councils. The Study was undertaken at high level and includes broad parcels of land, some of which have different characteristics but are assessed in a composite fashion. In addition to this, Turley undertook a high level review on behalf of Oxford City Council. The studies indicate that the Begbroke area makes a limited contribution to some of the green belt purposes and it is therefore appropriate that this area be considered further alongside other constraints and opportunities to accommodate part of the needs arising from Oxford.</p> <p>A more refined study of the green belt will also be required in respect of development options as it is clear that land currently in the green belt would not be so if it did not perform at least one of the purposes of the green belt.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	10+11	<p>The partial review will form a separate planning strategy which seeks to meet Oxford's unmet housing needs and should not therefore impinge on the existing strategy included in the Local Plan. It would be able to be provided with its own proposed housing trajectory and monitored separately.</p> <p>Whilst the NPPF does not make provision for ring fencing any particular area of a district, it has been used successfully in, for example, South Oxfordshire, where it has received the support of planning inspectors on appeals.</p>

PR-A-074	JPPC / Tripartite and University of Oxford	12+13	<p>It is imperative that Oxford's unmet housing needs are met as the lack of an adequate housing supply is causing social, economic and environmental stress in the City. The University seeks to attract the best students and researchers worldwide but has difficulties in doing so because of the affordability problems associated with the lack of housing. Other employers have similarly reported recruitment problems (Oxford was recently noted as having the least affordable housing market outside London). We note the references to Kidlington, Begbroke, and Yarnton in the text (paragraphs 5.25 to 5.29 and 5.35). Whilst the text notes the green belt, it highlights the many advantages of the area to accommodate new housing due to</p> <ul style="list-style-type: none"> - the role of Kidlington as an employment and service centre, - the London-Oxford Airport - Yarnton and Begbroke as category A (more sustainable) villages - The importance of Begbroke Science Park as a centre for research, business and academic work where the Part 1 Local Plan already includes a limited green belt review <p>However, it does not recognise the transport corridors to which the area is related which include the railway, canal and A44 as well as the good public transport links.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	14+15	<p>Reference to the aims and objectives is described above.</p> <p>The Council should consider the area around Begbroke Science Park as a suitable location in which to meet Oxford's unmet housing needs. A draft Masterplan has been prepared which is attached to these representations and which is formally submitted for inclusion in the Council's "call for sites".</p> <p>The draft Masterplan builds on the submission made for the limited review of the green belt and the opportunities which the development would bring are set out in the text accompanying the Masterplan.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	18+19	<p>Infrastructure delivery is essential to support new development as made clear in the NPPF. The dispersal of development makes infrastructure delivery more difficult and fragmented whilst concentration in larger scale developments provides the opportunity for focussed delivery of all necessary infrastructure to serve the new development. In the case of the Tripartite land, the development would be of a scale to support all necessary infrastructure and to assist in the delivery of infrastructure which would not only be required to serve the development but which would have a wider public benefit (see Q16 and 17 above).</p>
PR-A-074	JPPC / Tripartite and University of Oxford	22+23	<p>The University considers that the key sustainability issue of air quality relates primarily to transport, which in turn is directly influenced by the location of development. Current air quality in Oxford is poor and exceeds permitted European legal standards predominantly due to emissions from motor vehicles. Some of this poor air quality can be resolved through technology and the University is supporting the transition to Ultra Low Emission Vehicles. However, the largest improvement to air quality with co-benefits for carbon reduction and active lifestyles would derive from modal shift away from the car through correctly locating new development in the right place. This can best be realised through new public transport hubs such as that proposed in the Begbroke Science Park Masterplan with the combined bus and rail Park & Ride enabling a shift from car borne trips into the City of Oxford.</p>
PR-A-074	JPPC / Tripartite and University of Oxford	24+25	<p>As paragraph 5.137 of the Issues Consultation notes, a balanced view has to be taken between environmental constraints and the need for development. In the case of Begbroke, the land is not subject to any specific designation in respect of the landscape, habitats or protected species. It is a relatively flat landscape used for farming, part of which is subject to flooding (and which the Masterplan protects). As well as being subject to flooding the soil is medium quality with underlying gravel which limits its capability for viable crop production.</p> <p>The Masterplan includes reference to biodiversity from the University's ecologists, BSG Ecology, who have been involved with the land for a long period. The ecologists conclude that a net gain in biodiversity is able to be achieved with the proposed development of the site.</p>

PR-A-074	JPPC / Tripartite and University of Oxford	26+27	<p>The farmhouse at the Science Park is listed grade II. It is within the existing science park development and has a number of former barns which have been converted and which are connected to it. The intention is to retain the farmhouse and outbuildings as they are. New development is intended to respect their setting with open landscaped areas nearby. No other aspects of the historic environment would be impacted. Appropriate archaeological investigation would be undertaken in the normal way.</p> <p>However, on the basis of current information there are no known showstoppers which would adversely impact on delivery.</p>
PR-A-075	CPRE Oxfordshire	1	<p>It is essential to consider that the Oxford unmet housing need this revision seeks to accommodate is not current need, or the prospective future need of current residents – which is largely being satisfied within the City - but need which MAY be created by as yet unspecified new companies and jobs, should the LEP forecasts of future growth come to pass.</p> <p>These are in turn hypothesised to arise largely from the commercial realisation of new ideas created at the Universities, so-called spin-offs. The Universities are however not businesses, and there is therefore no reason (as SQW acknowledges) why they must be accommodated in or even near Oxford – or for that matter, in Oxfordshire.</p> <p>In those circumstances, the crude divvying up of this possible future demand amongst the District Councils is supported by no robust evidence of any kind - as to for example where this need will arise and/or where it may be most satisfactorily accommodated. (cont...)</p>
PR-A-075	CPRE Oxfordshire	1	<p>(cont...) CPRE of course considers that the SHMA is overblown, and – despite the length of the GL Hearn report – light on evidence. For that reason it is CPRE’s position that the housing trajectory in the adopted plan already exceeds any likely level of gross demand.</p> <p>However, even taking the SHMA as a given, half of the total housing demand it portrays is a hypothetical assumption about the number of new workers coming to Oxfordshire to take as yet unknown new job opportunities.</p> <p>It is an arbitrary proportion of that unknown level of hypothetical future demand that Cherwell is now seeking to accommodate without any evidence of the extent if any to which Cherwell may be a desirable place to accommodate it.</p> <p>It is not a reasonable working assumption to do so. Given that this is hypothetical future demand, which may or may not arise, at unspecified places and times, the partial revision of the plan is at best premature.</p>
PR-A-075	CPRE Oxfordshire	2	<p>Certainly Not. The extra housing is proposed to satisfy the unmet housing need which might (see Q1) arise from Oxford job creation. Cherwell creating yet more additional employment to “support” those houses would only, if the Oxford unmet housing need is real, compound the problems. If there is a reasonable fear that the houses might be built but the Oxford “unmet need” might not then arise – in our view a very likely scenario – then that is clear evidence to postpone development until the notional Oxford need crystallises.</p> <p>Cherwell’s own jobs need has been accommodated in the current Local Plan.</p>

PR-A-075 CPRE Oxfordshire	3	<p>It is up to Oxford to define and quantify evidentially the nature of its needs and issues, which it should do in connection with its long delayed agreement to update its own Local Plan, not for surrounding Districts to identify them.</p> <p>In CPRE's view a large part of the problem we may now face is to do with Oxford's persistent use of development sites such as the Northern Gateway to ratchet up housing need through more job creation rather than satisfy it through housebuilding, and, where sites are allocated for housing, the inappropriately low densities at which they are built out, given that the greatest part of demand is said to be for low-cost development.</p> <p>Reversing these two flawed policies would allow Oxford to satisfy within its borders, and more sustainably, more of the "unmet need" hypothesised.</p>
PR-A-075 CPRE Oxfordshire	4	<p>The additional growth arises from no Vision by Cherwell, but from imposition by the Growth Board in divvying up Oxford's hypothetical future needs.</p>
PR-A-075 CPRE Oxfordshire	5	<p>It would be indefensible to attempt to post rationalise it through some Vision for Cherwell.</p> <p>A Vision for meeting Oxford's imposed hypothetical future need, which is based on hypothetical realisation of spin-off ideas that have not yet occurred, would be to firstly ensure that meeting it is contemplated only when it crystallises and secondly that it is then met in the most sustainable location, which will not necessarily be Cherwell, or indeed Oxfordshire.</p> <p>There is no reason to assume that the University's spin-offs will be best realised in or near Oxford. Consideration should be given to those areas of the country which have vacant employment land and less expensive housing and which would be very keen to benefit from some of the growth opportunities being generated here. If Oxfordshire were to pursue the idea of economic twinning with some of these areas, this could lead to a win-win solution. (cont...)</p>
PR-A-075 CPRE Oxfordshire	5	<p>(cont...) This would indicate a re-establishment of the County Towns Policy, or even realisation in the Northern Powerhouse, neither of which would affect the success or failure of the as yet unidentified schemes.</p> <p>As far as Cherwell itself is concerned we see no reason to change the current Vision and the Spatial Plan which underpins it, summarised on Page 10 of the adopted Local Plan:</p> <ul style="list-style-type: none"> - Focusing the bulk of the proposed growth in and around Bicester and Banbury - Limiting growth in our rural areas and directing it towards larger and more sustainable villages - Aiming to strictly control development in open countryside. <p>It is against that template that any accommodation of Oxford's hypothetical future unmet need should be determined.</p> <p>This would include for example protection for the whole of the Green Belt as identified in the NPPF.</p>
PR-A-075 CPRE Oxfordshire	6	<p>No. As we have shown in our answer to Question 1, the hypothetical future unmet need in question is not related to the City in the sense that it can only be met there. To the extent that there might be a direct City connection it will only be that the new jobs that might be created might arise from University "spin-offs". These could however be accommodated anywhere and there is no reason at all to suppose that this must be adjacent to or even near the City.</p> <p>To the extent that Cherwell may wish to accommodate them, the existing Spatial Strategy would be the most appropriate model.</p>

PR-A-075 CPRE Oxfordshire	7	<p>Because the new jobs guestimate on which the housing need is hypothecated have not yet been identified, much less realised, it is premature to identify an Area of Search, and since it cannot be known where they would arise if they did eventuate it would be impossible to do so. Neither of course can it be known whether houses would be occupied by the classes of people for whom they were provided.</p> <p>In the lack of any evidence to the contrary, the only basis on which hypothetical distribution could be made, should that be felt to be desirable, would be on the current Spatial Strategy. Even then this could only be provisional until there was some robust evidence of the extent, certainty and location of the future “unmet housing need”.</p> <p>With those very substantial caveats, brownfield sites should be allocated and developed first, and the highest practical density assumptions should be made, given that if anything is certain in the present housing demand figures, it is that low cost housing is needed to balance Oxfordshire’s housing stock.</p>
PR-A-075 CPRE Oxfordshire	8	<p>Yes. The current Spatial Strategy is “District Wide” but correctly identifies areas where growth will and will not be directed. It should be the template.</p> <p>Equally, protected areas, such as Green Belt, should be off-limits.</p>
PR-A-075 CPRE Oxfordshire	9	<p>No. The essence of the Green Belt is its permanence, and the role it plays in preserving the essentially rural character of the County by preventing Oxford sprawl is invaluable. There is no “sustainability” argument for accommodating Oxford’s unmet need within it, for two fundamental reasons:</p> <p>i. The core of sustainability is not taking away from future generations benefits they would otherwise have enjoyed. Eroding the Green Belt would be by definition unsustainable and could be considered only if there were exceptional reasons to do so.</p> <p>The NPPF does not consider that housing need – even if real – is an exceptional circumstance to override the presumption of protecting the Green Belt.</p> <p>ii. There is no sustainability argument for meeting “Oxford’s unmet need” in the Green Belt adjacent to Oxford, as the “need” is not Oxford-related despite the name, but arises from hypothetical future jobs which could be realised anywhere. Even if it were Oxford-related, it could be met outside the Green Belt and should therefore not be met within it. Even if it could not, it should be reduced to the extent it would otherwise have been necessary to use Green Belt land. (cont..)</p>
PR-A-075 CPRE Oxfordshire	9	<p>(cont...) It is worth mentioning at this point that the NPPF does not in fact place any obligation on Councils to review Green Belts at the time of a Local Plan. It states only that IF they are reviewed the Local Plan is the time to do it.</p> <p>Only IF there are exceptional reasons for considering development on a particular piece of Green Belt land should its contribution to Green Belt purposes be assessed in order to determine the balance for release/retention.</p> <p>The Green Belt study by the County is an interesting – though contentious – assessment of Green Belt parcels County wide. It finds no sites that fail to meet at least two of the five Green Belt purposes and “one is enough” to justify retention. The studies by other Districts have been “searches for sites” with no exceptional circumstance relating to them individually, and are thus inadmissible in principle. In any case even they find that all sites contribute to at least two purposes.</p>

PR-A-075 CPRE Oxfordshire	10	<p>Yes and No. Ring-fencing the hypothetical Oxford unmet need would be desirable to protect the District's general Five Year Supply from its non-realisation. On the other hand if the houses are accommodated within the existing Spatial Strategy as we recommend, it will be hard to show that that element of the forecast has been undershot or exceeded, as it cannot be known which houses have been occupied by whom.</p> <p>In practise this could only perhaps be done by creating a special new settlement or area for 'unmet need', which would be to 'ghettoise' it. Even then the occupation of the houses could not be controlled. Indeed, even though the houses might be built in Cherwell, the new job holders might choose to live elsewhere.</p>
PR-A-075 CPRE Oxfordshire	11	<p>It is desirable but it is hard to see how it might be achieved in practise.</p> <p>The best strategy would be to delay allocating "unmet need" until its extent, nature and timing, and applicability to Cherwell can be more firmly established.</p> <p>It is understood that the new SEP may "phase" jobs growth which Districts could then phase housing development to match.</p> <p>The upcoming Oxford Plan refresh may alter the numbers and, particularly the extent to which they can and should be accommodated within the City through higher densities and dedication of land to housing rather than jobs growth.</p> <p>Cherwell could seek to influence the Growth Board on which it sits to determine more objectively the locations within which job growth might occur, and then determine any housing that might therefore be needed. (cont...)</p>
PR-A-075 CPRE Oxfordshire	11	<p>(cont...) Indeed the Councils could decide through the Growth Board to reduce the Growth trajectory to something more realistic and the housing demand to levels within the likely capacities of builders.</p>
PR-A-075 CPRE Oxfordshire	12	<p>It is strongly recommended that at the very least "unmet housing need" should be phased to the back ten years of the plan, reflecting more realistically its likely trajectory, and that the other measures to reduce or at least define the growth path should be examined.</p> <p>We generally support the approach in paragraph 5.37 on the assumption that it reflects the strategies in the current plan.</p> <p>Avoidance of use of land presently designated as Green Belt should be made specific.</p>
PR-A-075 CPRE Oxfordshire	13	<p>Housing Densities should be substantially increased to minimise land take and as the only practicable route to providing less expensive/starter housing.</p> <p>Current Policy B102 recognises the need to make efficient use of land but specifies only a minimum density of 30 per hectare which is at the bottom of the PPG3 range of 30-50 and well below, say, very desirable Victorian terraces at 70 per hectare. There is obvious scope for substantially increasing target densities.</p> <p>Failing to do so – because developers generally prefer more profitable low densities, for instance – will mean that a large proportion of new houses will go to new commuters with no connection to the District, whilst the reasonable housing needs of residents will go as unsatisfied as they are today.</p>

PR-A-075	CPRE Oxfordshire	14	<p>As stated above it is premature to begin to recognise an unquantified need at some indeterminate time in the future, and it would be foolhardy to attempt to do so.</p> <p>At such time as the need for extra housing can be robustly identified, and the need for it to be in Cherwell demonstrated, it should be:</p> <ul style="list-style-type: none"> - Allocated in accordance with current spatial strategies in the adopted Local Plan. - Phased in accordance with a demonstrable trajectory of jobs growth. - Recognised that it does not need to be situated near Oxford. - Built out at the highest practical densities to minimise land-take and provide lower cost housing. - Be concentrated on brownfield sites where practicable. - Avoid Green Belt and other designated land.
PR-A-075	CPRE Oxfordshire	15	New housing – when and if better justified – should follow the Spatial Strategy in the adopted Local Plan.
PR-A-075	CPRE Oxfordshire	16	LTP 4 would require review in the light of the increased housing numbers; following the existing Spatial Strategy should minimise the adjustments which might need to be made.
PR-A-075	CPRE Oxfordshire	22	<p>It is inherently unsustainable to build housing over and above the District’s needs and the as yet to be evidenced “unmet housing need”, as this will either lead to empty housing or to a take-up by new commuters, probably to London.</p> <p>It is noted that the NPPF declares sustainability the golden thread running through all its policies and declares that housing development is not a reason for releasing either Green Belt or AONB land. For that reason it is clearly unsustainable to do so. It is also unsustainable in the wider sense that it removes a benefit which future generations would otherwise have enjoyed.</p>
PR-A-075	CPRE Oxfordshire	23	See answer to question 22. For those reasons, the “unmet Oxford need” should not be accommodated until there is more certainty that (a) it is real and (b) has to be met in Cherwell, and in any event development in designated areas such as Green Belt and AONB must be eschewed.
PR-A-075	CPRE Oxfordshire	24	<p>The natural environment of Cherwell District is overwhelmingly rural, and little or no consideration is given to the impact on character of extra housebuilding and, especially, whether there is, as we fear, a tipping point after which industrialisation becomes self-reinforcing. The Council must give consideration to those issues for the benefit of the residents it is its duty to serve as well as for the countryside CPRE is pledged to seek to protect.</p> <p>Additionally, Cherwell is an area of water stress and flooding, both of which will be exacerbated by population increase and by the effect of development in increasing pressure on supply and run-off and in reducing the ground available to absorb precipitation.</p>
PR-A-076	Berks, Bucks and Oxon Wildlife Trust	24	All potential site allocations should be subject to ecological assessment to ensure there will be no significant negative impacts on biodiversity in accordance with policy ESD10. In addition to considering the potential ecological impacts of individual site allocations, the potential for the cumulative ecological impact of the additional development, alongside planned development in Cherwell and adjacent districts will need to be assessed (including, for example, the allocation of sites to meet Oxford’s unmet need within South Oxfordshire). In particular, consideration will need to be given to potential impacts on Oxford Meadows SAC, as well as SSSIs and Local Wildlife Sites. Additionally, consideration should be given to the presence of CTAs and the ability to maintain or create an ecological network. Both direct and indirect impacts (including hydrology, air quality and recreational pressure) should be assessed.
PR-A-076	Berks, Bucks and Oxon Wildlife Trust	25	The effect of the above on potential development locations is unknown until assessments take place, but the area surrounding Oxford Meadows SAC is particularly sensitive due to the potential to lead to changes in hydrology, or increases in air pollution or recreational pressure on the European site.

PR-A-077	Banbury Civic Society	1	<p>Para 2.7 to Para 2.10 do not clearly demonstrate that Oxford City has a short-fall, only that there is a chance it might not be able to meet the SHMA target. Indeed, so far as I can trace there has been no independent moderation of the remit, criteria, methodology etc. for the SHMA (other than the report must support the government's target – based on what demographics ?) and it is therefore questionable whether the target figures that are being used are in anyway realistic.</p> <p>Not-with-standing the Duty to Co-operate there should not be an assumption that the situation addressed in the consultation document will prevail and it must be Oxford City's obligation to demonstrate that it really cannot meet this target. (cont...)</p>
PR-A-077	Banbury Civic Society	1	<p>(cont...) Viewed from a map or the air, Oxford City contains considerable undeveloped areas (private sports areas and flood susceptible meadows. The sports areas could be relocated into the 'green belt' and there are measures that could be adopted to utilise flood prone areas for housing / employment. These should be aggressively investigated and independent advice obtained to support any rejection of this approach.</p> <p>Therefore it is premature to offer any opportunity for Oxford City to export its unmet needs to the disadvantage of neighbouring Authorities – except, perhaps by utilising the 'green belt' sites mentioned in the consultation document.</p>
PR-A-077	Banbury Civic Society	2	<p>Yes. If OCC's LTP4 is to have any weight at all, any 'overspill and/or SHMA related, housing MUST be accompanied by provision for sufficient 'high end' employment opportunities within 'local' travelling distance – and the public transport facilities to meet this demand must also be provided or supported.</p> <p>Actually the employment provision should be more than is required for the 'over-spill' population as already there would appear to be a short-fall of employment opportunities elsewhere in Cherwell District (e.g. Banbury) which will undermine the thrust of LTP4 by forcing residents to commute long distances to work places (e.g. Banbury to Science Vale) with all the economic and environmental disadvantages this will entail.</p>
PR-A-077	Banbury Civic Society	3	<p>Given the comments above the City should aggressively examine the potential for relocating existing non-housing and/or commercial uses out of the City area, together with the more productive use of existing open space areas. This is not to say that local parks etc. should be 'at risk,' but there are extensive areas which are not in public use, other than for agricultural or amenity purpose, and the City must critically analyse these for future housing.</p> <p>There will, after all, be a plentiful supply of 'fill' material from the HS2 project which could well be used to raise ground levels or form levees. (cont...)</p>
PR-A-077	Banbury Civic Society	3	<p>There are two areas, which Oxford City should address in concert with Cherwell DC and those are the undeveloped core of the area bounded by the A44, A4095, A4260 & Oxford Canal, which must be ripe for development, being near good or potentially improvable transport facilities, and, second, the Oxford Airport. This whole area contains a site for a potential railway station (Kidlington restored) and is also within easy reach is the community, education and other facilities of Kidlington, not to mention the recently opened improved rail route to London and the potential cross-country rail route to the east (East /West Rail Link).</p> <p>Furthermore this area is close to the existing commercial area of Langford Lane and the Begbrooke Science Park. As the airport is already a land-use not normally associated with 'green belt', its future must be weighed against the priority of meeting any demand for housing land – if indeed a need can be demonstrated – and therefore the airport site should compete against the other needs and be considered as available for alternative development. This could provide a welcomed 're-balancing' of population and employment across the Cherwell District and in any event be closer to the existing employment 'attractors' of the City and the Science Vale. (cont...)</p>

PR-A-077	Banbury Civic Society	3	<p>(cont...) Upper Heyford airfield already provides an excellent runway and some airport infrastructure, and notwithstanding the conservation and 'listed building' issues, could be re-activated to provide the fixed wing facilities to serve the South Midlands hinterland without necessarily jeopardising the status of the existing facilities that are seemingly so important. Any 're-activation' need not detract from the 'historic' interest of the site (there are numerous examples of 'listed' assets being in full use despite the 'listed' status) and in this case it could provide a very useful asset to handle the larger aircraft flying in support of local forwarding / courier enterprises and charity requirements for emergency shipments (e.g. Oxfam), not to mention a possible expanded passenger service.</p> <p>The airport site could be accessed easily from the M40, and also be served via one existing and one potential rail station.</p> <p>Cherwell DC's housing allocation for this area could be guided to locations away from the flying operations and, indeed, the 'high-end' employment that would follow the transfer would be very welcome for this relatively isolated location.</p>
PR-A-077	Banbury Civic Society	5-25	<p>The above remarks should provide sufficient impetus to guide future policies in answers to these later questions.</p> <p>No specific supply should be identified until a 'need' has been properly demonstrated and all other solutions investigated and found unachievable.</p> <p>Given the considerable additional population that Cherwell has been required to accommodate under the SHMA (see above), it will be very difficult for the existing communities to absorb even more new dwellings. If this eventuality were to come about then the whole basis of the Approved Local Plan would have to be re-thought as neither of the two major habitations in Cherwell District (Banbury and Bicester) will have the capacity to absorb even more population growth without further catastrophic impact on both their 'green fringes' and environments. (cont...)</p>
PR-A-077	Banbury Civic Society	5-25	<p>(cont...)</p> <p>There is, already a serious danger of these communities, particularly Banbury, becoming 'dormitory / commuter' towns given the 'draw' of the Science Vale project and other employment 'hot-spots' to the east. This would be a complete negation of the County Council's transport strategy and for which, at present, the infrastructure is inadequate (see the Cherwell District Local Plan and the yet to be consulted Banbury Master Plan)</p> <p>The current emphasis seems to be favouring 'executive, type housing, with the pricing structure of the 'affordable' element being such that they are not really affordable to the average employee in our towns and villages. Really good quality, but realistically priced, low cost housing (both for purchase and rent) must be prioritised along with the provision of a range of employment opportunities suitable for a wide spread of abilities and skills. This would require a 'root and branch' review of the disposition of housing and commercial activities if the towns and villages, particularly in the north of the District are to flourish and not become commuter dormitories. (cont...)</p>
PR-A-077	Banbury Civic Society	5-25	<p>(cont...) In conclusion our Civic Leaders need to ask themselves whether this is really to be, as aspired in the consultation document : –</p> <p>'an area where all residents enjoy a good quality of life.....and will be more prosperous than it is today. Those who live and work here will be happier, healthier and safer'.</p> <p>A nice thought, indeed, but..... !!</p>

PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	1	<p>Paragraph 2.11 of the Issues Consultation sets out that, 'Each Oxfordshire authority has its own perspective and independent consultants have been jointly appointed to act as a 'critical friend' to assist the process and scrutinise the position of each Council.... The final conclusions will be considered by the Growth Board in Summer 2016.'</p> <p>Paragraph 2.12 of the Issues Consultation sets out that, 'While this work has not been finalised, on 19 November 2015 the Oxfordshire Growth Board agreed a total working figure for Oxford's unmet need of 15,000 homes - that is the level of need that cannot presently be met by Oxford City Council.'</p> <p>Paragraph 2.14 then confirms that, 'It will not be until the countywide work is complete that this figure can be refined and a housing distribution to individual districts can be agreed.'</p> <p>Paragraph 2.16 then states that, '...Were this figure to be distributed evenly between Oxford, Cherwell, West Oxfordshire, South Oxfordshire and Vale of White Horse Councils, this would produce a requirement of some 3,000 homes per authority area.' (cont...)</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	1	<p>(cont...) Paragraph 2.17 follows on with, 'This figure would potentially increase for the rural districts if Oxford's contribution were to be less than 3,000. It may also change if the overall countywide level of unmet need changes or if the countywide work shows that there are significant differences between the relative sustainability of potential options for meeting Oxford's unmet housing need, meaning one authority should take more or less than another. Allowing for these possibilities might suggest a working figure for Cherwell of approximately 3,500 homes, until completion of the countywide work in Summer 2016.'</p> <p>In answer therefore to the question, it is clear that there is currently insufficient information or evidence to conclude whether 3,500 homes in Cherwell District is the correct basis for a figure to meet Oxford's unmet housing need. Based on the evidence currently available however, it is reasonable to proceed on this basis until there is further clarity which is expected in summer 2016 from the Growth Board.</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	6	<p>Paragraph 1.7 of the Oxfordshire Strategic Housing Market Assessment – Summary Key Findings on Housing Need, March 2014, sets out that, 'The SHMA has defined Oxfordshire as the relevant housing market area.... This reflects the flows of people moving home and commuting across local authority boundaries, as well as the economic influence of the City.'</p> <p>It is therefore considered that the entire Oxfordshire HMA has already been established as being 'well related to Oxford City' for the purposes of defining an area of search.</p> <p>The NPPF emphasises the need for development to be sustainable. One key component of sustainability is to ensure sustainable access to a range of facilities and services is accommodated. As above, Cherwell's existing vision and strategy emphasise the need for sustainable growth and for that reason has focused the bulk of the proposed development around Bicester and Banbury.</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	6	<p>(cont...) Bicester also benefits from strong connections to the Strategic Road Network with recent improvements to M40 Junctions 9 and 10 and with a potential additional motorway junction being considered as part of the wider Garden Town status awarded to Bicester.</p> <p>It is therefore clear that by continuing to focus the bulk of development in Bicester and Banbury, as per the vision and strategy set out in the LPP1, the aims of achieving as 'area of search... well related to Oxford' would also be successfully achieved.</p> <p>Notwithstanding the above, given that the entire Oxfordshire HMA is considered to be well related to Oxford City, the direction of development elsewhere within the administrative area of Cherwell District, including the Green Belt, would also help to meet unmet needs of Oxford City.</p>

PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	7	It follows therefore that the factors influencing the area of search should be the continuation of the vision and spatial strategy as set out in the LPP1, which would also ensure that the search area is well related to Oxford.
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	8	With this in mind, a district-wide search area would only be appropriate within the context of the vision and spatial strategy as set out in the LPP1, which is to focus the bulk of the proposed growth in and around Bicester and Banbury.
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	9	<p>As above, the Issues Consultation clearly sets out that this Partial Review is intended to be an addendum to the Local Plan Part 1. Again, as above, the vision and strategy must therefore be shared with the already adopted LPP1 i.e. to focus the bulk of the proposed growth in and around Bicester and Banbury (page 10 LPP1).</p> <p>A 'full strategic review of the boundaries of the Oxford Green Belt' cannot form an 'Addendum' to the previously adopted LPP1. This is on the basis that an 'addendum' implies that the vision and strategy will broadly be in conformity with the adopted plan that the addendum would sit alongside (as confirmed by para 1.5 above of the SA to the LPP1 Addendum). A full strategic review of the Green Belt could result in an entirely new vision and strategy.</p> <p>Whilst there is no objection to undertaking a full strategic review of the Green Belt, given that this is clearly something that could result in an entirely new vision not compatible with the existing strategy and vision currently in the adopted LPP1, any strategic review of the Green Belt boundaries should not be a part of an 'addendum' to an existing strategy and document as currently suggested is an option.</p> <p>Therefore, to ensure the approach is sound, the Oxford Green Belt cannot be considered as part of the search area for this LPP1 Addendum.</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	10	<p>Once further detail on the exact nature of Oxford's need has been identified, a clearer answer to this question can be provided.</p> <p>In the meantime, however, it is clear that a flexible approach to meeting Oxford's housing need should be applied. It would not be appropriate to consider that the strategic allocations identified within LPP1 are purely to meet Cherwell's need and any additional strategic allocations would contribute towards Oxford's unmet housing need.</p> <p>This would be a simplistic and unrealistic approach to a complex matter. It is possible that build rates could exceed those identified within the Housing Trajectory of the LPP1, to deliver housing ahead of the anticipated time line. There should be scope for that additional development to be considered as meeting Oxford's unmet housing need. (cont...)</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	10	<p>(cont...) Given the addendum is based on the existing strategy and vision for Cherwell, any extensions to existing strategic allocations are likely to be delivered towards the middle to end of the existing plan period. It should not automatically be assumed that these extensions will contribute towards Oxford's unmet housing need. It is possible that existing allocations could contribute towards Oxford's unmet housing need and the additional sites that are identified could in fact contribute towards 'back-filling' of Cherwell's need.</p> <p>Until there is additional information to be fully clear on the exact detail of Oxford's unmet need however, this level of detail is not possible to consider, but in developing options Cherwell District should be flexible at this stage as to how to appropriately progress this matter.</p>

PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	11	<p>The wider housing market area needs to produce a strategy which sets out a comprehensive approach to the management of housing land supply which allows for flexibility for districts to make contributions when they have the ability to do so.</p> <p>The range of a choice in sizes and types of sites will enable Cherwell to bring sites forward earlier in the plan period should this be necessary to address potential housing land supply issues. The availability of deliverable sites will be key to this approach. This should include smaller non-strategic sites and extensions to strategic allocations. It is considered that new stand-alone strategic allocations, whilst able to make a valuable contribution to the long term housing supply tend to be associated with longer lead in periods, which smaller sites or extensions to existing sites are not usually subject to. The potential to expand upon existing strategic allocations should not be overlooked, where the potential to utilise new infrastructure can be maximised.</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	15	<p>See above answers to questions 6, 7, 8 and 9 above.</p> <p>One consideration is whether the Bicester housing market can absorb further growth given the concentration of housing provision in one location. Based on the transformation of change in the scale, character and function of Bicester, which will effectively create a new market, it is considered that this new housing market in Bicester can successfully absorb higher build rates than previously anticipated within the housing trajectory and the resulting further growth.</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	16	<p>For additional development to meet the requirements of the NPPF and Cherwell's sustainable development policies set out in the Local Plan, it is essential that any additional housing is located such that it allows sustainable access to a range of key facilities and services.</p> <p>As above, Cherwell, and in particular Bicester, is well located in relation to the city of Oxford, with excellent new rail connections delivered as part of East-West rail and further connections via new Park and Ride services which opened in 2015 and via existing bus services. These strong foundations will be supplemented by the comprehensive sustainable transport package that will be delivered as part of the LTP4 and as part of the development of strategic developments across Bicester.</p> <p>Bicester also benefits from strong connections to the Strategic Road Network with recent improvements to M40 Junctions 9 and 10 and with a potential additional motorway junction being considered as part of the wider Garden Town status awarded to Bicester.</p> <p>More locally within Bicester, the LTP4 identifies a package of transport improvements which represent a significant enhancement to the capacity of the existing road infrastructure within the town. This package of highway improvements includes the delivery of peripheral route enhancements around the eastern side of the town, including the provision of a new South East Perimeter Road. These improvements are designed to cater for significant increases in development across the town, enabling through-traffic movements to be diverted away from the town centre.</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	16	<p>(cont...) With this additional infrastructure in place and with the introduction of the proposed Sustainable Transport Strategy, the traffic analysis undertaken to date demonstrates that there would be spare capacity within the town's road network to accommodate further housing growth. There is potential scope for further mitigation measures to be implemented to address residual impacts and this would be influenced by the location of any further growth.</p> <p>There is therefore potential for Oxford's unmet housing needs to be accommodated within Bicester, with areas to the east of the town ideally placed to offer the opportunity to exploit the proposed step change in infrastructure provision. There is scope for the planned sustainable transport strategy to be expanded to enable additional growth to be delivered within Bicester.</p>

PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	17	These matters reinforce the fact that the vision and spatial strategy of the adopted Local Plan Part 1 are the most appropriate framework in which to deliver this additional growth as part of the LPP1 Addendum.
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	19	<p>These matters demonstrate that the most appropriate location for additional growth is within Bicester and Banbury. These are the locations where attention has previously been focused in accordance with the vision and spatial strategy of the LPP1 and most is known about the transport and other infrastructure needs of these two locations.</p> <p>It is also clear exactly what (if any) additional mitigation is required in order to accommodate further growth within these locations, without compromising the existing strategy. Given the scale of growth, continuing to focus development in these locations, will also ensure Cherwell has a clear vision, rather than creating a different vision for the delivery of this additional housing, which would not only conflict with the aims of the LPP1, to which this Partial Review forms an addendum, but also confuse matters, by not having a clear vision or strategy. To successfully deliver this level of growth, a clear vision is vital.</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	4+5	<p>The additional growth should continue to reinforce the spatial strategy for Cherwell District, which as set out in paragraph vi of the adopted Local Plan Part 1, can be summarised as follows,</p> <ul style="list-style-type: none"> - 'Focusing the bulk of the proposed growth in and around Bicester and Banbury, - Limiting growth in our rural areas and directing it towards larger and more sustainable villages. - Aiming to strictly control development in open countryside.' <p>It is clear from the Consultation Issue Paper that this Partial Review of the Local Plan to accommodate Oxford's unmet housing need is intended to be an Addendum to the already adopted Local Plan Part 1. It can only be considered an Addendum if the vision and spatial strategy as set out in the adopted Local Plan Part 1 are continued as part of the Addendum.</p> <p>Paragraph 4.3 of the LPP1 Issues Consultation sets out that, 'The Vision in the Local Plan Part 1 must therefore form the starting point for this Partial Review, but there will also need to be consideration of issues and evidence that relate to Oxford's housing need. This will include matters included in the Oxfordshire Strategic Housing Market Assessment (SHMA) and the vision and objectives for Oxford City set out in its Core Strategy. A new focused Vision will need to be prepared which underpins the Partial Review's spatial strategy and which does not adversely affect the recently adopted Cherwell strategy.' (cont....)</p>
PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	4+5	<p>5 (cont...) The emphasis that the vision and spatial strategy of the LPP1 should be followed for the LPP1 Addendum is more strongly stated in the Partial Review of the Cherwell Local Plan (Part 1): Oxford's Unmet Housing Need - Sustainability Appraisal Scoping Report (SA for the LPP1 Addendum).</p> <p>The wording at paragraph 1.5 of the SA for the LPP1 Addendum sets out that, 'The Local Plan Part 1 partial review is a Development Plan Document that will effectively be an addendum to the Local Plan Part 1 – it will sit alongside it and form part of the statutory Development Plan for the District. The Partial Review has a specific focus and it is not a wholesale review of Local Plan Part 1. The vision, aims and objectives, spatial strategy and the policies of the Local Plan Part 1 will guide development to meet Cherwell's needs to 2031.' (cont...)</p>

PR-A-078	Boyer Planning / Redrow Homes & Wates Developments	4+5	<p>5 (cont...) On the basis that the LPP1 Addendum has the same plan period as the LPP1 and it is not a whole sale review of the document, in order for it to be considered sound, it must have the same vision and strategy as the already adopted LPP1.</p> <p>Furthermore, the current strategy results in Bicester experiencing substantial change. To alter this direction would result in there not being a clear vision or direction for CDC's Local Plan. Indeed any new vision could also conflict with the aims and direction of the current vision. Indeed para 3.1 of the LPP1 Issues Consultation highlights this point by setting out that, 'Our adopted strategy is aimed at meeting Cherwell's needs, not Oxford's, but it is important that any new growth does not undermine or hinder the delivery of growth already planned.'</p>
PR-A-079	Fringford Parish Council	7+1	<p>The Economist has reported that in a recent 12 month period, Oxford completed 65 dwellings. It seems very unfair that they should then expect residents of Cherwell to help make up some of the shortfall especially those to the North side of Bicester which is only going to increase the traffic issue.</p> <p>Given that Cherwell's spatial strategy contained in Local Plan Part 1 indicates that growth in the rural areas will be limited and "focus on meeting local community and business needs", it is assumed that none of Oxford city's unmet housing need would be proposed to be met in villages such as Fringford.</p> <p>Fringford and the villages North of Bicester would not be a feasible or sustainable location to meet Oxford City's unmet need due to the great employment travel distance and the poor road infrastructure through the rapidly expanding area in and around Bicester.</p>
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	1	<p>There is a significant likelihood that Oxford City Council will not be able to allocate sufficient land to provide the extra 3,000 dwellings currently required towards meeting the 15,000 homes for Oxford's unmet needs. Much of the City is tightly constrained by biodiversity & flooding constraints and/or is Green Belt land important for maintaining the setting and special character of Oxford. The largest area of undeveloped land that is not in the flood plain or Green Belt is Southfield Golf Course in Headington, but this adjoins the Lye Valley SSSI, which contains highly sensitive and nationally rare wetland fen habitats. There may therefore be additional housing which Cherwell District Council will need to accommodate.</p>
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	2	<p>In order to promote sustainable work patterns and reduce long distance commuting it is essential for employment to be provided close to where people live. In providing housing to meet Oxford's unmet need it is therefore essential that provision is also made for employment for these new residents. This accords with the advice in the National Planning Policy Framework that 'plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimized and the use of sustainable transport modes can be maximized,' (para 34) and that 'for larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including working on site.' (para 38) Allocating land in Cherwell District for at least 3,500 dwellings is large scale residential development which needs to be complemented by allocating sufficient land for employment for these new residents.</p> <p>In this respect there are particular opportunities at Kidlington both for residential development, including on the J A Pye (Oxford) Ltd land at Webbs Way and for further employment provision, such as at Langford Locks, which adjoins the key employment area at Langford Lane, as identified on the accompanying site submission forms. In locational terms, Kidlington is essentially a suburb of Oxford, so locating housing and employment there to meet Oxford's unmet need makes a lot of sense.</p>
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	3	<p>The key Oxford issues are that due to environmental constraints, as quoted in paragraph 2.24 of the Issues Consultation Paper 'it will never be possible to meet all the city's housing and employment needs. Housing need and demand far exceeds the amount of available and suitable land within Oxford, and employment uses struggle to compete against housing developers.' For these reasons allocating land for housing development in sustainable locations such as Kidlington has the potential to make a significant contribution to meeting Oxford's unmet housing need.</p>

PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	4	Additional growth in Cherwell District will help the Council to achieve its strategic objectives as set out in the Cherwell Local Plan part 1 such as: SO 1 To facilitate economic growth and employment and a more diverse local economy with an emphasis on attracting and developing higher technology industries. SO 3 To help disadvantaged areas, support an increase in skills and innovation, improve the built environment and make Cherwell more attractive to business by supporting regeneration. SO 6 To accommodate new development so that it maintains or enhances the local identity of Cherwell's settlements and the functions they perform. While clearly the review will need to focus on ensuring that Oxford's unmet housing need is met, this is not considered to be inconsistent with meeting the existing Cherwell Local Plan objectives.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	5	The vision should focus on accommodating the development in sustainable locations that will promote the prosperity of the Oxford region as a whole and meet Oxford's housing needs as identified in the Oxfordshire Strategic Housing Market Assessment (2014).
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	8	As the northern part of the district around Banbury is around 30 miles from Oxford it is considered that locations closer to Oxford should be chosen for meeting Oxford's unmet need.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	9	<p>It is considered to be important that a Green Belt review is undertaken as the Local Plan Inspector considered that there needed to be: "...a formal commitment from the Councils, to undertake a joint review of the boundaries of the Oxford Green Belt, once the specific level of help required by the city of Oxford to meet its needs that cannot reasonably be met within its present confines, is fully and accurately defined." Given these comments should no review of the Green Belt be undertaken the proposals to meet Oxford's unmet need would not meet the soundness test of being justified as it would not be possible to show that 'the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.' (NPPF, para 182)</p> <p>Both of the site submissions that J A Pye (Oxford) Ltd have made at Kidlington are located in the Green Belt and are therefore covered by the Land Use Consultants (LUC) Oxfordshire Green Belt Study 2015, albeit that this was a strategic study that did not look at the particular merits of individual sites. In this respect the site at Langford Locks falls within land parcel K18. The LUC study indicates in Table 4.1 that this parcel makes no contribution towards the purposes of including land in the Green Belt apart from a low contribution towards purpose 3 of safeguarding the countryside from encroachment and a high contribution towards purpose 2 of preventing neighbouring towns from merging into one another. This is owing to this parcel of land being located between Begbroke and Kidlington. However, the J A Pye (Oxford) Ltd land at Langford Locks at Kidlington is already adjoined by the existing Station Field Industrial Park to the north, with an existing access point already provided for its future extension, and is separated from the rest of land parcel K18 by the Oxford Canal to the west. It does not therefore make a significant contribution towards achieving this objective and its removal from the Green Belt would therefore have a negligible impact on the achievement of Green Belt purposes. (cont...)</p>
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	9	<p>(cont...) The other area of land covered by a J A Pye (Oxford) Ltd site submission at Kidlington is located at Webbs Way. This site falls within land parcel K13. This is assessed as making no contribution towards Green Belt purposes apart from a low contribution towards preserving the setting and special character of historic towns and a high contribution towards safeguarding the countryside from encroachment. However, the inner field at Webb's Way is already adjoined by residential development on three sides, namely Webbs Way, Mill St and Spindlers and there is a thick hedge on the fourth side and so it could be developed with very little impact on the character of the open countryside. J A Pye (Oxford) Ltd have made a second submission for Webbs Way which includes a further field to the east, which is currently partially screened from the Cherwell Valley on its eastern side by trees and shrubs to the north and south and an incontinuous tree/shrub line on the eastern boundary. With strengthening of the planting on this boundary development could take place on this larger site without significant encroachment into the countryside. It is therefore considered that as part of the Green Belt review the J a Pye (Oxford) Ltd sites at Langford Locks and Webbs Way should be removed from the Green Belt in order to meet Oxford's unmet need.</p>

PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	10	Given that the partial Local Plan review to meet Oxford's unmet housing need will result in the identification of specific sites to meet this need it is important that a specific housing supply is identified for meeting Oxford's needs with its own five year supply of deliverable sites.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	11	Given the high level of housing need in both Oxford and Cherwell Districts, which is also likely to grow over time, it is unlikely that the existing Cherwell strategy and its housing requirements will be adversely affected by ensuring that there is also a five year housing land supply for Oxford's unmet need.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	12	As noted in paragraph 5.22 centre to centre, Kidlington and Oxford are approximately 8 km (5 miles) apart, but the built up edges are only 1.5 km apart, with the new Oxford Parkway Railway Station located in the gap between the two settlements. Although having a separate identity Kidlington is therefore in locational terms essentially a suburb of Oxford and a highly sustainable location for further housing and employment development. Reference is made in paragraph 5.27 to the land between Kidlington, Begbroke and Yarnton being often referred to in planning terms as 'the Kidlington gap.' However, development on the north east side of Kidlington would not affect these coalescence issues, and would also not affect the gap between Oxford and Kidlington.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	13	Nothing to add at this stage.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	14	To provide a mix of housing that accords with the findings of the Oxford Strategic Housing Market Assessment 2014.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	15	Kidlington as it is an ideal location for residential development to meet Oxford's unmet needs as it is located very close to Oxford with frequent bus services to the city, while the Oxford Parkway railway station is located between Kidlington and Oxford. It also has excellent access to employment including Langford Lane; Langford Locks and Begbroke Science Park, which are due to expand in accordance with the Cherwell Local Plan 2011 – 2031 policies. Kidlington is also located close to the Oxford Northern Gateway where 55,000 square metres of employment use is proposed.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	16	Not additional to the points already raised in response to earlier questions.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	17	Locations in the Southern half of the District that are well connected by public transport such as at Kidlington are the most sustainable locations for further development in transport terms.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	18	Not additional to the points already raised in response to earlier questions.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	19	Locations with significant services & facilities, such as Kidlington are the most sustainable locations for more development.
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	28	Site submissions - Land at Webbs Way, Kidlington (X 2) and Langford Locks, Kidlington. Yes. Call for site forms are attached for the following sites: i) Webbs Way, Kidlington (TWO SITES): residential – two forms relate to this site with one form relating to a larger site than the other; ii) Langford Locks, Kidlington: Employment;
PR-A-080	West Waddy ADP / J.A.Pye (Oxford) Ltd	20+21	The Oxford and Oxfordshire City Deal identifies a knowledge spine stretching from Science Vale, through Oxford to Bicester. Concentrating development within this knowledge spine such as at Kidlington will help secure the economic growth aspirations of the City Deal as well as contributing towards meeting the employment needs of the residents of the additional housing provided to meet Oxford's unmet need.

PR-A-080	West Waddy ADP / 22+23 J.A.Pye (Oxford) Ltd		Locating the growth in larger settlements such as Kidlington will ensure that residents have access to a good range of facilities without the need to travel.
PR-A-080	West Waddy ADP / 26+27 J.A.Pye (Oxford) Ltd		Development in locations with Conservations Areas or close to other historic assets is considered to be acceptable in order to meet Oxford's unmet needs, as these areas have historically developed over time, provided the new development respects its historic setting and will conserve and enhance the heritage asset.
PR-A-080	West Waddy ADP / 6+7 J.A.Pye (Oxford) Ltd		Yes it is considered to be essential that the area of search should be well related to Oxford City, otherwise the housing provision would not be likely to meet Oxford's unmet housing need, as this relates to people who have a need to live in the vicinity of Oxford. It is agreed that key factors that should help define the area of search include those listed in paragraph 4.8 including distance/proximity to Oxford; key transport corridors with transport linkages to Oxford; economic links to Oxford; and the catchment orders of higher order services at Oxford.
PR-A-081	Kirtlington Parish Council	1+12	<p>1. Whereas housing delivery numbers are analysed annually, there has been no further review of the original SHMA; this is a significant issue since economic growth has not followed the pattern anticipated. As the SHMA defines the calculation of housing numbers, we applaud the reviews currently being undertaken by the Oxfordshire Growth Board, especially with regard to capacity within Oxford, and consider that before Cherwell District's acceptance of any of Oxford's unmet housing needs, the outcome of these reviews is awaited and acted upon.</p> <p>2. In this part of Cherwell District, commuters to London, Birmingham and places in between compete for the housing stock, often with higher London salaries. For Cherwell District to accept even more housing than it is already committed to will not necessarily help Oxford's unmet housing needs, or only for a proportion of the extra houses. (cont...)</p>
PR-A-081	Kirtlington Parish Council	18+26+9	<p>(cont...)</p> <p>3. Cherwell District's infrastructure in terms of roads, public transport, sewerage, electricity grid, etc. as well as in terms of its traditional rural villages and rural, agricultural landscape, is already stressed by the amount of development required.</p> <p>4. Oxford's Green Belt is in great need of re-evaluation. Currently, far more environmental harm is being created (and will get worse) with the traffic problems of commuting into Oxford than any benefits of keeping this outdated 'Green Belt', some of which is not now fulfilling the 5 purposes for its designation. It would be more beneficial environmentally for more of Oxford's unmet housing needs to be built adjacent to Oxford, even in land that has been Green Belt. Instead truly rural green belts could be defined around the rural settlements to maintain the District's agriculture, rural villages and heritage.</p>
PR-A-082	Glaisher / Earnshaw	1	Given the government has said it will consider new proposals to abolish Oxfordshire County Council and hand its duties to new "unitary councils, the realignment may see other areas and councils investment into this have a significant input. Should this whole reassessment take place after such decision? Surely this question should be left for now. Would it not be best left till the proper assessment is determined? If developers are working to the higher number, it would be harder to claw back to the lower figure. if you ask me now, No! These are Oxford's needs, not Cherwell's needs. Oxford should therefore carry by far the biggest proportion of the housing burden. If Oxford needs more houses then the majority should be built on Oxford's green spaces, not those of Bicester. Oxford should be building 5000 to 8000 of the new homes required to reduce the burden on other areas. Building homes in Cherwell for people in Oxford will increase the amount of people commuting into Oxford where the roads are already at capacity.
PR-A-082	Glaisher / Earnshaw	2	<p>No! It makes no sense to supply new housing in Cherwell to meet Oxford's needs, if the additional employment is created in Cherwell to serve those homes. That would result in both housing and employment having nothing to do with Oxford where the need is, as Oxford already has more jobs than people to fill them.</p> <p>Using tainted figures for the Local Plan in July 2015, increased the number of houses needed, and then the need for more employment. A rigorous method of assessing the need should be used to reassess the baseline figure (need not greed) before agreeing to any additional figures</p>

PR-A-082	Glaisher / Earnshaw	3 1 & 6	Oxford already has more jobs than people. Housing must therefore be provided in Oxford to prevent more commuting traffic on the road. Relaxing the green belt restrictions around Oxford is therefore vital to enable development of areas such as Water Eaton which will be served by the new Oxford Parkway mainline station.
PR-A-082	Glaisher / Earnshaw	4	To protect quality of life, prosperity, happiness and health of existing residents of Cherwell/Bicester instead of ruining their lives by surrounding their homes with giant distribution warehouses and industry to support potential future residents. Bicester could be the happiest town in Brittan like the recent survey which list south oxford. Which by the way is taking a smaller proportions of new housing and employment. A normal sustainable growth in line with national averages should be look at, the whole picture and joining up the growth so the infrastructure is in place first. Get the work done for assessing the best plans before agreeing the planning applications. Take the time now the growth in over next 15years not all to be delivered by 2020
PR-A-082	Glaisher / Earnshaw	5	Unbiased figures obtained in an weekend by a arbitrary figure plucked out of their heads to meet a deadline. Get some proper figures not speculation for greed's sake. Is Oxford relevant when Cherwell is set to become part of Northamptonshire's coverage? Our vision should be toa protect Cherwell and not take on Oxford's problems totally screwing our region just before it's handed over (dumped) to Northamptonshire. Cherwell should be cooperating with Northamptonshire and Buckinghamshire's local governments under the Localism Act 2011, not just Oxford.
PR-A-082	Glaisher / Earnshaw	6	The area of search to provide housing for Oxford city should be restricted to Oxford City and its green belt. Reevaluate what is set aside to produce a better mix of open spaces and urban edges
PR-A-082	Glaisher / Earnshaw	7	Evaluation of what has already been assigned and reevaluate them based on the whole development site current and proposed The factors to influence the area of search should be housing in Oxford to stop/reduce commuting and thereby protecting rural areas in Cherwell.
PR-A-082	Glaisher / Earnshaw	8	No. The factors to influence the area of search should be housing in Oxford to stop/reduce commuting and thereby protecting rural areas in Cherwell. Look at the district as a whole redefine what areas are best for housing and commuting and set aside employment areas that don't detract from the uniqueness of the separate parishes and towns and villages. Don't co locate low skilled warehouse employment hubs in housing developments the idea that people will walk to work they can't afford to live in the locations better yet to not add to the congestion of towns and villages a more strategic location to consider these eyesore. So we can't build up Oxford we will push everything else where and just get housing and high tech stuff in Oxford
PR-A-082	Glaisher / Earnshaw	9	Yes – this is Oxford City's need, not Cherwell's but in keeping with the original principals, utilising other areas within Oxford (less greed more need). More housing for less industry
PR-A-082	Glaisher / Earnshaw	10	Yes, if that housing supply is identified in Oxford, not Cherwell Other areas will lose their individual significance, and just be a spill over to accommodate oxfords needs for housing. Without better infrastructure, we will all be at a stand still on the roads just to get to where we are going
PR-A-082	Glaisher / Earnshaw	11	By saying no, or only agreeing to developments in parts of Oxford's green belt eg Water Eaton to serve Oxford Parkway. Get better information and give the appropriate time and resources to debate figures from industry who only have only their own interests at heart (need not greed)

PR-A-082	Glaisher / Earnshaw	12	Oxford has more jobs than people because housing costs are so high in Oxford. The only way to address this without screwing up the whole county is to build more houses in Oxford not Cherwell (apart from the Oxford green belt that is part of Cherwell). If housing is the issue, focus on housing accept the fact the surrounding areas are going to be commuter settlements and stop loading the area with low paid warehouses and employment supposed opportunities. Get the right blend of jobs and employment companies to get interested. An over all development plan is needed to stop this piecemeal approach to development mixing the communities in with such overbearing buildings. if the towns and villages wanted to be stuck in traffic and overpopulated they would have moved to Oxford proper. Keep the district clean from this development onslaught to get the cheapest fastest and biggest amount of development approved fast before the real effects on the infrastructure can be realised
PR-A-082	Glaisher / Earnshaw	13	Yes – stop messing up the homes and lives of existing residents in Bicester These changes need to be presented to resident, the main stakeholders, objectively and with in the spirit of truth. Not engaging in the consultation means the important considerations are not taken into account which leads to objections later in the process and time wasted. Get developers to realise that Cherwell will expect the best levels to be achieved on parts, in the design, and in the considerations etc.. This will insure if projection are not correct, the results will be considerably better then if they just meet the standards
PR-A-082	Glaisher / Earnshaw	14	Oxford’s housing needs must be met in Oxford – see questions 12 and 13.
PR-A-082	Glaisher / Earnshaw	15	Or Get the funding from them to create the infrastructure like roads and hospitals and public transport. Before any Oxford’s green belt, Water Eaton, Kidlington and Upper Heyford.
PR-A-082	Glaisher / Earnshaw	16	Housing should be in Oxford to meet oxford’s employment needs without commuting, not in Cherwell which would increase commuting journeys. The time invested into graven hill would be lost, but the first bricks are not down. reassign this brown site with links to mainline from being converted, when a big need for industry that would have rail and road links so reduced commuting though residential areas be perfect as it has been for the past decades. is it because a separate company is overseeing this, and they would not be able to make as much money or receive as many accolades. A41 and A34 are at extreme capacity, get the roads and public transport better before the houses and employment sites should be top priority and not add to the mess
PR-A-082	Glaisher / Earnshaw	17	Bicester’s roads are already totally inadequate for current needs and the proposed new roads will not help. The new SE perimeter road route proposals are all unacceptable (destruction of wetlands and/or archaeological heritage and/or isolation of Wendlebury). The A41 Aylesbury Road/Ploughley is already at full capacity with many long traffic jams during rush hour and will just get worse with new developments. The new proposed spine road through the Wretchwick Green development is totally unacceptable as it will have heavy traffic inc HGVs routed through the centre of housing developments. Improvements/new roads from North and East Bicester to M40 junction 10 required.
PR-A-082	Glaisher / Earnshaw	18	Bicester is failing to provide appropriate required infrastructure. The sewage treatment works is already failing to meet demands of current population. New Ambrosden water main does not have the capacity to supply the Bicester Plan 12 site through which it passes. Town centre redevelopment and Bicester Village do not provide for the needs of local residents (apart from Sainsbury).
PR-A-082	Glaisher / Earnshaw	19	Bicester does not have the necessary infrastructure needed to meet the needs of current residents. It definitely does not have the infrastructure to meet the needs of the current local plan and certainly does not have the infrastructure required to take on Oxford’s housing needs.

PR-A-082	Glaisher / Earnshaw	20	Bicester needs high tech/high skill employment commensurate with the Oxfordshire Knowledge Spine. It does not need massive B8 distribution warehousing which cannot supply the salaries required to buy property in Bicester and which fails to meet the NPPF objective of a low carbon future.
PR-A-082	Glaisher / Earnshaw	21	Cherwell should be aiming to support Bicester's (and the Cherwell region's) residents, not future Oxford's.
PR-A-082	Glaisher / Earnshaw	22	Developing B8 distribution warehouses around Bicester completely fails to meet the objectives of increasing biodiversity and reducing flooding. In fact it will do the opposite. Developers involved in Akeman Park (aka Symmetry Park) in Bicester Plan 12 site are not even attempting to achieve a high BREEM rating. This warehousing with it's associated lorry parking almost completely paves over the whole site which will lead to flooding of Launton, Ambrosden and other sites on the River Ray. The fields on this site are clay based and have a very high water retaining capacity with low run off speeds. Any proposed drainage scheme (SUDS compliant or otherwise) will not be capable of maintaining current run off rates. There will be massive habitat loss for many protected species.
PR-A-082	Glaisher / Earnshaw	23	Cherwell should be aiming to support Bicester's (and the Cherwell region's) residents, not future Oxford's.
PR-A-082	Glaisher / Earnshaw	24	Building on the Ray Meadows Conservation Target Area. Many protective species currently on this site will be lost due to habitat destruction. A couple of ponds and a few trees will not mitigate this loss.
PR-A-082	Glaisher / Earnshaw	25	Cherwell should be aiming to support Bicester's (and the Cherwell region's) residents, not future Oxford's.
PR-A-082	Glaisher / Earnshaw	26	The ridge and furrow landscape surrounding the Wretchwick Deserted Medieval Village (scheduled monument) should not be built over by the Wretchwick Green development. In the West Midlands alone, over 90% of ridge and furrow landscapes have been lost to ploughing or developments. No figures are available for Cherwell or even nationally, but it is thought that the national situation is worse with more than 90% loss. Potentially the southern edge of Bicester 12 plan site could house numerous archaeologically important features due to the proximity of the Akeman Street Roman Road and nearby Roman town of Alchester. Geophysics surveys already performed will not show these due to the waterlogged nature of the soils
PR-A-082	Glaisher / Earnshaw	27	What possible justification can there be to build over the historic landscape of Bicester instead of the green belt of Oxford. This is utterly ridiculous
PR-A-083	Bonnar Allan Limited	1	While the authorities within Oxfordshire are currently working to define the respective quantities of housing that each must contribute to meet the City's needs, we consider that the differing situations and contexts within each of the Districts means that an equal apportionment is most unlikely to be justified. The Vale of White Horse (VoWH) and West Oxfordshire Districts are the most constrained in terms of landscape designations (AONBs) and also have inferior transport connections to Oxford when compared to South Oxfordshire and Cherwell.
PR-A-083	Bonnar Allan Limited	2	<p>South Oxfordshire and VoWH have historically focused a large amount of growth around Didcot and Milton Keynes (MK). We consider that locations for additional housing should wherever possible and appropriate, be supported by employment generating development in order to create the potential for people to live and work in close proximity and thereby avoid the need to travel. Such development can include a wide variety of uses including schools, shops, community facilities as well as office and industrial space.</p> <p>At Wendlebury we are proposing to provide primary and secondary schools as well as a nursery; shops; health; and community facilities, all of which will provide employment opportunities. The location to the east of the village is very well located relative to wider office and industrial employment opportunities at Bicester and the fundamental enhancements to the railway line between Bicester Town and London Marylebone as well as that soon to be delivered between Bicester and Oxford mean that travel to other centres of employment will be facilitated via more sustainable means.</p>

PR-A-083	Bonnar Allan Limited	4	Additional growth should seek to provide homes in an attractive, high quality environment which does not have an adverse impact on Areas of Outstanding Natural Beauty or other areas protected for their inherent qualities or constraints (such as floodplain and/or Green Belt),and which provides the ability for residents and visitors to travel to Oxford (where the need is focused) and beyond in as environmentally friendly a way as possible. The opportunity to provide improvements to infrastructure to benefit existing residents and visitors should also become an objective of planned growth.
PR-A-083	Bonnar Allan Limited	6	Any area of search for meeting Oxford's unmet need should include location(s) that can deliver on the principles above, and which are as close to Oxford as possible without compromising the Green Belt around the City. Critically these locations must be directly accessible to rail services into Oxford from either existing or potential new stations where those are practicable. In practice the areas of search should thus be drawn around Bicester in the north east and around the Heyfords to the north of Oxford.
PR-A-083	Bonnar Allan Limited	15	<p>The Council should positively consider our proposed site at Wendlebury as a strategic location capable of delivering a substantial proportion of the suggested housing need that Cherwell DC should provide for (up to 3,000 of the 6,000 homes).</p> <p>Wendlebury is our proposal for a sustainable new community of up to 3,000 new homes that will serve the needs of the City of Oxford.</p> <p>This will create a community that will utilise the existing rail infrastructure to allow commuting both into Oxford and east to Bicester and beyond. (cont...)</p>
PR-A-083	Bonnar Allan Limited	15	<p>(cont...) Our vision for Wendlebury is for it to be an 'energy positive' development; that is to say, one which makes a net contribution to the national grid rather than drawing energy from it. We will achieve this through a combination of careful design and layout making the most effective use of the site's topography and microclimate as well as employing the most efficient fabric for buildings.</p> <p>The urban extension provides the opportunity to deliver a range of essential facilities for Wendlebury which currently does not exist. It will include a range of retail and community facilities laid out in a traditional arrangement with a focus on high quality public realm.</p> <p>The new extension will also deliver new primary and secondary schools which the current village is without. These will be located centrally to provide for accessible walking routes for the village.</p>
PR-A-083	Bonnar Allan Limited	15	<p>(cont...) Key Benefits-</p> <p>The City of Oxford needs a very substantial number of new homes to sustain growth projections over the period 2016-2031. Estimates vary but the number could well be 18,000 or .more outside what the city itself can provide. The key benefit of our proposal is that it would deliver a little under 20% of this requirement in one exceptionally sustainable satellite location that can be delivered over the next ten years.</p> <p>These proposals are designed to be complementary to the allocations within the recently adopted Cherwell District Local Plan, and Importantly offer a significant solution to CDC's duty to cooperate which the Planning Inspectorate expects by June 2017.</p> <p>As well as providing market and affordable homes for around 7,000 people, Wendlebury will provide primary and secondary schools as well as new retail space, health and community fadlities so that new and existing residents do not have to travel into Bicester. This boost in provision will benefit those that have experienced a decline in local retail and leisure facilities in recent times. (cont...)</p>

PR-A-083	Bonnar Allan Limited	15	<p>(cont...) The new community will take access from the newly diverted langford Lane and potentially from the planned south-eastern bypass of Bicester. The location of the site on the railway line south of Bicester and within the M40 provides the potential for a Park & Ride facility that would be connected to the railway by a new halt. The proximity of Wendleford to the town centre in Bicester and the flat topography provides scope for walking and cycling to access the shops and services.</p> <p>The opportunity exists to create a new focus for a highly energy efficient community that can benefit from and augment the existing Investment in the Garden Town at Bicester. Taken together, new communities at both settlements could provide an even more sustainable focus that would be of a scale to enable them to support more of their own functions and needs as well as being in a position to make use of the rail connection to Oxford for 'higher order' functions.</p> <p>In summary, residents of Wendlebury would be within 30 minutes of the centre of Oxford via a sustainable mode of travel (the train), allowing people to work and/or study in the city while gaining the benefits of living outside the city. The development of a new community could fund significant public benefits that could be enjoyed by residents and visitors alike, and new community facilities including healthcare, schools and shops that would benefit new and existing residents alike.</p>
PR-A-083	Bonnar Allan Limited	18	<p>The existing railway station at Bicester Town provides the opportunity to serve the proposed new community at Wendlebury and provide 'transport into Oxford City Centre as well as east to Milton Keynes and south to London Marylebone. The rail service will allow travel into Oxford within 20 minutes.</p> <p>Once in Oxford City Centre, a proportion of people will wish to travel to the science parks and employment areas in the south and southeast of the City, and we consider that the potential to provide a shuttle bus service between the rail station and those destinations should be explored, to improve their accessibility and provide connections with rail services and other bus routes.</p> <p>A network of easily accessible pedestrian and cycle routes will be incorporated to encourage trips to Bicester by more environmentally friendly modes of travel as opposed to the private car.</p>
PR-A-083	Bonnar Allan Limited	28	<p>Site submission - Land East of Wendlebury.</p>
PR-A-084	Banbury Town Council	1	<p>BTC are concerned regarding Banbury's distance from Oxford city and whether other more sustainable, core-located sites should be prioritised. This is particularly relevant in light of the ongoing review of bus subsidies in the area which negates the local transport plan's call for a modal shift to public transport. BTC continues to have a number of concerns regarding the feasibility of modal shift in the Town. Modal shift to public transport will only be effective if the service provision, and the 'pro's' of public transport outweigh those associated with private car use.</p> <p>Therefore, Banbury's capacity to accommodate further residents alongside the burden these residents are likely to place on County's road network between Banbury and Oxford (and elsewhere) is also of concern.</p> <p>As a matter of principle BTC feel that meeting Oxford's unmet housing need in the Banbury environs is not sustainable and the focus for meeting this need must be the Banbury environs.</p>
PR-A-084	Banbury Town Council	2	<p>Yes, though Banbury itself has a low unemployment rate of 0.7%, BTC would support core-sited (Banbury) employment and housing provision. Banbury's proximity to the M40 appeals to companies looking to house B8 warehousing facilities on its eastern outskirts, though BTC would prefer these sites to house smaller and more high-tech industry. As a principle BTC would like to ensure that employment densities be as high as possible, with employment sites distributed sustainably throughout the town, easing the burden on the town's overburdened road network.</p>

PR-A-084	Banbury Town Council	4	BTC hopes planned growth within Banbury itself (7,000 homes) will be factored into district-wide growth allocation decisions, and that additional Oxford growth is located as close as possible to Oxford. BTC accepts that as an urban hub Banbury must be a focus for growth but would like to see district-wide sustainable growth. It must be noted, for example, that a green buffer allocated to Banbury in a recent iteration of the local plan already has already had 150 (further) houses placed upon it.
PR-A-084	Banbury Town Council	5	BTC would like to see sustainable development locations achieved with each urban hub within the county (and potentially beyond) serving its own need as locally as possible. To expand upon this, BTC would like to see a district-wide, sustainable growth strategy for meeting Oxford's Unmet Need that factors in (existing) planned growth across the district, and proximity to and strength of transport connections with Oxford.
PR-A-084	Banbury Town Council	6	Yes, as Banbury already has plans for a further 7,000 homes, BTC would like any further growth within Banbury to meet Banbury's growth needs rather than those of Oxford.
PR-A-084	Banbury Town Council	7	BTC would like to see planned growth (7,000 homes) within Banbury factored in alongside consideration of the town's inadequate infrastructure and relatively poor transport connectivity with Oxford. Any future growth within Banbury would need to examine greater traffic easing measures alongside increased public transport provision. BTC would therefore support the exploration of sites closer to Oxford itself, as these closer sites would likely place less demand on the existing road infrastructure and public transport services.
PR-A-084	Banbury Town Council	8	BTC believe sites more closely related to Oxford than Banbury should be prioritised for meeting Oxford's unmet need. BTC do not believe the modal shift detailed (for Banbury) in LTP4 is sustainable or attainable. Only if sufficient contribution to the District's road infrastructure is made and increased public service provision in line with the modal shift detailed in LTP4, provided, might the siting of this need in Banbury be feasible. However current indications are that this will not be the case, so to reiterate BTC do not feel siting this unmet need in Banbury is appropriate.
PR-A-084	Banbury Town Council	10	BTC would support the provision of separate sites closer to Oxford to meet this housing demand to prevent planned growth within Banbury from becoming muddled with this (separate) supply. BTC would therefore like to see any planned growth within Banbury to not become compromised or muddled with any separate housing supply.
PR-A-084	Banbury Town Council	11	BTC would support a review of the Oxford green belt with sites closest to Oxford prioritised.
PR-A-084	Banbury Town Council	12	BTC would like to highlight the point made in 5.32 that, 'The distance between Banbury to Oxford (centre to centre) is about 47 km (29 miles)' and would also support the inclusion of green belt sites bordering Oxford into any 'area of search'.
PR-A-084	Banbury Town Council	14	The sustainability of locations where this housing is to be situated, both in terms of the capacity of the places chosen to accommodate that growth and the ease of accessing Oxford from these chosen areas.
PR-A-084	Banbury Town Council	15	BTC would support a review of the Oxford green belt with sites closest to Oxford prioritised.
PR-A-084	Banbury Town Council	16	<p>Any additional growth within Banbury should include enhancement of the town's bus network, with a focus on improving links between residential areas and key employment, leisure and retail destinations, the town centre and the rail station. There needs to be closer working among a range of stakeholders including Cherwell District Council, residents, bus operators, developers, local employers and business groups to achieve this.</p> <p>BTC would like to flag however how across key employment sites in the town, different shift patterns as well as weekend work are in operation, making bus services between residential areas and employment sites unsustainable, as start-end times vary depending on the particular business. This accentuates the need for improvement to Banbury's road infrastructure (increasing its capacity) as private car is likely to remain the primary means the town's residents use to reach employment sites. (cont...)</p>

PR-A-084	Banbury Town Council	16	<p>(cont...) BTC would also like to highlight concerns over the impending electrification of the railway along the 'Oxford Corridor'. This will force Bridge Street to be closed to allow for the bridge to be raised. This will further impede traffic trying to cross from the east of Banbury to the west, as the only available route will be along Hennef Way and along Concorde Avenue. As well as the electrification of the 'Oxford Corridor', developments on HS2, although not directly going through Banbury, will have a significant impact on lorry and vehicle movements accessing Junction 11 of the M40. This is again, likely to have a significant effect on already strained west-to-east movement within the town.</p> <p>Similarly BTC would like to reiterate its ongoing desire for a South East Relief Road (joining the Central M40 site to Bankside) to take traffic from employment zones in the East to residential areas in the South, this would also help large HGV vehicles to bypass the town centre (a situation likely to worsen with the electrification works discussed above).</p>
PR-A-084	Banbury Town Council	17	<p>It must be considered how any additional growth to meet Oxford's unmet housing needs will impact Banbury's already heavily-strained and congested, transport picture, and whether as a result of this congestion, Banbury at the present time is the most suitable location to house this need sustainably.</p>
PR-A-084	Banbury Town Council	18	<p>Banbury Town Council has serious concerns that the majority of arterial routes and junctions in and around Banbury are currently at, or over, their capacity. Further (already planned) housing development around the town is only going to cause additional strain on road networks.</p> <p>BTC would like to reiterate the need for a South East Relief Road. For a number of years there have been efforts, by Banbury Town Council and other organisations such as Banbury Civic Society, to have a 'south-to-east' link road. Currently there are only two bridges which cross the railway line, river and canal. This means that, especially during 'rush-hour' these roads get extremely congested. The impending electrification of the railway along the 'Oxford Corridor' will also force the closure of Bridge Street placing an even greater stress on the town's already overburdened road network, meaning that prior to the increased capacity provided by these improvements the town's transport networks will be very stretched. (cont...)</p>
PR-A-084	Banbury Town Council	18	<p>(cont...) BTC would also like to see a greater opening up of Tramway, details of which are outlined in later responses, as well as creation of more green links across the canal. BTC would like to see the linking of Canalside residential areas to the town centre by (re)using the existing structures of 'lift bridges' by the Fort Locks self-storage.</p> <p>BTC would also welcome the expedition of CDC's CIL charging schedule, so that a clearer picture of possible contributions towards infrastructure improvements could develop.</p>
PR-A-084	Banbury Town Council	19	<p>The CIL charging schedule at the district level being at draft stage, coupled with the resulting absence of a district- (and hence town) wide Community Infrastructure Project List means Banbury's infrastructure's capacity to absorb future growth is currently uncertain.</p> <p>Also the transition from Section 106 to CIL is likely to spark a flurry of development applications within the town as CDC's (Feb '16) preliminary draft charging schedule has calculated that CIL charges for developers within Banbury (pp.4, 13/00056/OUT + £820,418, 14/00066/OUT +1,382,459) will likely be considerably higher than the S106 ones they are replacing.</p>

PR-A-084	Banbury Town Council	20	<p>BTC would like support in raising educational attainment and developing skills within the workforce. The basis for developing a highly skilled, technical workforce already exists within Banbury's motor industry and needs to be built upon. There is an over concentration upon raising academic, educational achievement, with school league tables, publication of GCSE results etc. at the expense of vocational/apprenticeship training which would better suit the economic landscape of the town.</p> <p>As the biggest conurbation outside of Oxford, Banbury needs special and sympathetic consideration when considering meeting Oxford's unmet housing need. Though Banbury's unemployment rate by national standards is low (0.7%) BTC note that much of the town's employment is taken up by manufacturing positions. BTC would therefore like to do all it can to attract smaller, high-tech industries to the town. Possibly through the designation of a Local Enterprise Partnership (LEP) which has proven successful at attracting grouped industries elsewhere across the county, e.g. Science Vale.</p>
PR-A-084	Banbury Town Council	21	<p>BTC would like current and future residents, in line with its mission statement, to both work and live sustainably within the town. Fostering greater collaboration between organisations based in town and the town's educational institutions is one means of attaining this, alongside a diversification of the town's economic base.</p>
PR-A-084	Banbury Town Council	22	<p>BTC feel the existing roads around Banbury are inadequate for the current housing need with insufficient parking allocation for individual need. This results in many more cars parking on amenity land i.e. grass verges. This can then be exacerbated by commuters using the residential estates for parking either to work in the town or commute to other areas. When these verges are not parked on they often fall foul to larger vehicles requiring access i.e. delivery/refuse vehicles that cause significant damage creating trip hazards and the pooling of large quantities of water especially when other vehicles may be parked at the side of the roads.</p>
PR-A-084	Banbury Town Council	23	<p>BTC feel poor planning has led to "rat runs" being created through residential areas and this in turn has led to health and safety issues for local residents and children. Any increase in the number of residents and hence road users is likely to exacerbate these problems. Another aspect of this is open space/play area provision adjacent to or located on residential roads and the possibility of clashes between users and vehicles. BTC would support the use of more "sleeping policemen" to slow traffic down through residential streets and/or the use of traffic management methods such as raised planting borders to reduce the amount of straight roads in new developments.</p>
PR-A-084	Banbury Town Council	24	<p>BTC would like to see the right choice of trees, shrubs and other vegetation to reduce the amount of ongoing maintenance, too often BTC feel the wrong variety of tree is placed in the wrong location i.e. surface or shallow rooting species. BTC therefore desire appropriate planting locations for vegetation especially with maintenance budgets shrinking. Quite often trees are planted in open ground conditions adjacent to highways when the use of tree pits could be installed to limit root development that could cause problems many years later. BTC also support the use of alternative ground protection schemes to limit damage to verges and other soft landscaped areas.</p>
PR-A-084	Banbury Town Council	26	<p>As noted in Cherwell's Design and Conservation Strategy: The overall vision of the Sustainable Community Strategy for Cherwell in 2030 is: A diverse economy with opportunities for all, vibrant communities connected by a sense of pride, place and purpose. Cherwell's Economic Development Strategy (2011-16) has a key aim: Our district will be an even better place in which to live, work, learn and spend leisure time. The quality of the natural and built environment is central to achieving these aims. (para. 131)</p> <p>- The District possesses a wealth of distinctive and attractive traits of its own that include the diverse Ironstone and Otmoor countryside, the Oxford Canal, the gentle Cherwell Valley and picturesque villages with pubs offering high quality cuisine. Recognised by many for its market cross and nursery rhyme connection with a fine lady on a white horse, the area also has strong links to the English Civil War, the author Flora Thompson and, over the last 40 years, the annual Fairport Convention folk rock festival at Cropredy, thriving farmers' markets and an annual canal day. We are working to promote the connections with more recent military history, the Second World War and The Cold War at RAF Bicester and former RAF Upper Heyford respectively, and these will offer a synergy with the nearby attraction at Bletchley Park. Four and a half million people, including many from the Far East and China, visit Bicester Village every year, but few venture beyond their shopping experience. (cont...)</p>

PR-A-084 Banbury Town Council	26	<p>(cont...) - The challenge is how to get these visitors to explore further and stay longer. The weekend break and holidays at home are growth areas to be tapped and we are drawing on the intrinsic landscape and heritage of our 59 conservation areas, promoting green tourism, food trails, literature, music and canal festivals and, in so doing, helping to keep village shops open, pubs trading, footpaths maintained, villages well cared for, the local economy buoyant and the District looking the way it does. North Oxfordshire has a unique position as a quality tourism destination, but can only thrive if the quality of the historic and rural environment is maintained and championed.</p> <p>Para 1.4.1 presents “A Word Picture of Cherwell: SWOT Analysis”</p> <p>- Threats</p> <ul style="list-style-type: none"> • Growth pressures favours fast growing urban extensions, making organic growth difficult • Out of town retail undermining historic core • Pressure to meet decision deadlines in development control, leaving little time for negotiating improved proposals <p>- Weaknesses</p> <ul style="list-style-type: none"> • Loss of industrial heritage, both buildings and skills • Some characterless suburbs • View of Banbury from the motorway <p>- Strengths</p> <ul style="list-style-type: none"> • Varied attractive landscape • Historic villages • Historic market towns with medieval street pattern intact and well preserved historic cores • Strong local distinctiveness • Rich palette of materials • Oxford Canal • River Cherwell (cont...)
PR-A-084 Banbury Town Council	26	<p>(cont...) Under the Cherwell Local Plan 2031, the challenge of meeting Oxford’s unmet housing need has already had a substantial, detrimental effect on Banbury’s attractiveness as a historic market town, the Oxfordshire SHMA having already imposed an additional 2,000 homes on the town, over and above the 5,500 or so homes that Cherwell’s assessments found the town’s historic and landscape environment could cope with. As a result additional development is already enclosing the much-loved, prehistoric Salt Way, Crouch Hill and Banbury Circular Walk in additional suburban growth. The same development is also resulting in the coalescence of Banbury and the outlying historic villages, particularly Bodicote, Bloxham and Adderbury. Hundreds of additional homes resulting from the SHMA have also further compromised the historic integrity and tourism potential of the former RAF Upper Heyford.</p>
PR-A-084 Banbury Town Council	27	<p>Further development around Banbury would threaten the separate identities of the historic villages of Great Bourton, North Newington and Hanwell. Further development at RAF Upper Heyford would substantially erode the remaining Cold war ambiance of the former nuclear airbase and its tourism potential.</p> <p>Banbury may be argued to be a sustainable location for accommodating more of Oxford’s unmet housing growth, on account of its direct rail link to Oxford. There are nevertheless far more sustainable location within Cherwell that are within easy cycling distance of the City and which have much shorter rail links and far more regular bus services. The inter-war communities of Kidlington and Yarnton both readily spring to mind. Both communities have already coalesced with Oxford and both have long been well known for their relative lack of historic or architectural interest. The crescent of landscape between these communities, bounded by Water Eaton to the south and by Kidlington Airport to the north is topographically, scenically and historically uninteresting. What countryside that remains is also already almost completely screened from public view by inter-war ribbon development on the Woodstock and Banbury roads.</p> <p>Green Belt or no Green Belt, it makes absolutely no sense to locate Oxford’s overspill 20 to 30 minutes away from Oxford, in historically sensitive locations such as Banbury, Upper Heyford or North Cherwell, while far less sensitive and far more sustainable sites exist within a 5-minute train ride / 15 minute cycle ride from Oxford’s city centre.</p>
PR-A-085 Kidlington Parish Council	1	<p>On the assumption that that Oxford City Council cannot meet its own housing requirements having been independently and objectively assessed then the housing should be met by all the districts across the county equally as indicated.</p>

PR-A-085	Kidlington Parish Council	2	In the interests of sustainable development there should be a balance between housing provision and employment provision and positive moves should be made to encourage employment development within proximity to new housing that minimises transport movements.
PR-A-085	Kidlington Parish Council	3	Oxford City Council needs to re-examine its priorities for development in accordance with achieving a better balance between employment generation and housing – including releasing sites for housing otherwise allocated for different types of development that have been slow to bring into use as well as other redundant uses such as the Greyhound Stadium that could contribute to housing need within the City.
PR-A-085	Kidlington Parish Council	4	The retention of the Green Belt and the prevention of coalescence of settlements Directing growth at areas where sustainability will be more easily achieved in line with current major development designations within Cherwell.
PR-A-085	Kidlington Parish Council	5	This should not include expansion at the edge of Oxford unless within a broader vision of achieving good place making – potentially this applies to the south side of Oxford adjoining Greater Leys.
PR-A-085	Kidlington Parish Council	6	Not necessarily, there may be locations where this appropriate to create a better integration and form such as an urban extension to Greater Leys, elsewhere the priority should be to retain the objectives associated with the existing Green Belt designation and development elsewhere focused on providing the entire range of development to achieve balanced communities.
PR-A-085	Kidlington Parish Council	7	First, an objective assessment of potential land for housing in Oxford itself alongside an analysis of its ability to deliver housing in recent years assessed against the availability of development sites and the reasons why they have or have not come forward for development. This should be completed before any area of search is conducted within Cherwell.
PR-A-085	Kidlington Parish Council	8	Not necessarily, the area of search should primarily focus on the most sustainable locations for development outside of the Green Belt with specific reference to accessibility to Oxford as an employment centre.
PR-A-085	Kidlington Parish Council	9	Generally not except as an urban extension to Greater Leys.
PR-A-085	Kidlington Parish Council	10	Any extra housing should be added to the Cherwell DC housing supply to ensure that this is a comprehensive figure
PR-A-085	Kidlington Parish Council	11	The point of this partial review is to make amendments to Part 1 of the Local Plan and therefore integrate the extra housing provision to become a part of the Cherwell strategy.
PR-A-085	Kidlington Parish Council	12	The associated text gives an indication of the fragility of the Green Belt between Oxford and Kidlington and any change the has an impact on that is contrary to the specific objective associated with Green Belt designation to prevent coalescence of settlements.
PR-A-085	Kidlington Parish Council	13	The nature of the housing market is distinctly different from that of Cherwell and as the Oxford housing market addresses specific needs – such as those associated with the student population and a relatively transient population is it likely that providing housing away from Oxford will actually help to address the housing shortfall in the City?
PR-A-085	Kidlington Parish Council	14	That the housing market in Cherwell is fundamentally different from that of Oxford.
PR-A-085	Kidlington Parish Council	15	Whether the locations can help to address those needs and in a sustainable way that will not erode the objectives associated with the Green Belt.

PR-A-085	Kidlington Parish Council	16	As this links into the County Council transport strategy this is difficult to consider in connection with this document. Elements of the County Council's strategy have a clear impact upon Kidlington, specifically for two proposed Park and Rides, transport links to a proposed Park and Ride at Langford Lane and the potential change in status of the current Park and Ride at Water Eaton. How these fit into a potential review of the Green Belt in the area around Kidlington needs to be clearly explained in the proposed amendments to Part 1 of the Cherwell Local Plan.
PR-A-085	Kidlington Parish Council	17	These are very significant issues associated with pressure from Oxford for more housing in the Kidlington area that could not be accommodated within the existing boundaries of Kidlington and need to be clearly assess.
PR-A-085	Kidlington Parish Council	18	Extra development provides pressure on existing infrastructure that is often already inadequate and cannot be met by S106 and CIL payments associated with new development. Kidlington has a number of existing infrastructure deficiencies and these would not be addressed by additional development.
PR-A-085	Kidlington Parish Council	19	Bicester is receiving significant extra funding for infrastructure provision associated with its Eco Town and Garden Town designations and therefore is more capable of dealing with increased levels of development particularly associated with the Oxford-Cambridge arc and longer term transport improvements.
PR-A-085	Kidlington Parish Council	20	We have already seen the allocation of land at Oxford's Northern Gateway to remove land from the Green Belt, this is indicative of allocating extra land for employment in Oxford that increases the potential unmet housing need and placing pressure on further incremental changes to the Green Belt for housing. Although this site also includes housing it is indicative of the lack of balance Oxford City Council has with its planning policies with the potential impact upon neighbouring authorities as well as the Green Belt.
PR-A-085	Kidlington Parish Council	21	Employment provision needs to be balanced against housing provision and if extra housing is to be allocated to Cherwell to help meet the perceived shortfall in Oxford additional land allocated for employment is also required and preferably in locations that support other sustainability objectives, such as in Bicester.
PR-A-085	Kidlington Parish Council	22	The Local Plan Part 1 seeks to avoid coalescence between settlements, any further residential development between Kidlington and Oxford would be contrary to this objective.
PR-A-085	Kidlington Parish Council	23	There should be no opportunity to provide housing between Kidlington and Oxford. Sustainable development is clearly directed towards Bicester and additional housing allocations here should go towards meeting the unmet needs of Oxford.
PR-A-085	Kidlington Parish Council	24	Substantial areas around and adjoining Kidlington, besides being designated Green Belt, have flooding potential and therefore development potential is naturally limited.
PR-A-085	Kidlington Parish Council	25	The potential to flood in the areas around Kidlington mean that new housing opportunities are extremely limited and unlikely to meet any of Oxford's unmet needs.
PR-A-085	Kidlington Parish Council	26-28	No comment.

PR-A-086	Turley / Bovis Homes Ltd	1	<p>A precise housing capacity figure for Oxford City has not yet been agreed by the Oxfordshire Growth Board. In addition work is being undertaken to consider the relative sustainability of the potential options for meeting Oxford's unmet need. Work undertaken by Oxford City Council also shows that the area's most appropriate to accommodate the unmet need are located to the north and south of the City (i.e. Cherwell and South Oxfordshire Districts). Expansion to the west and east of the City is significantly constrained.</p> <p>These factors will have a significant bearing on the level of distribution to the district authorities. It is therefore considered that the working assumption for Cherwell should be higher than 3,500 homes. It is considered that Cherwell's previous working assumption of 7,000 homes is more appropriate realistic figure.</p>
PR-A-086	Turley / Bovis Homes Ltd	2	<p>Oxford is the main driver of economic growth and housing need in the area. It is therefore not necessary to plan for additional employment development to accommodate Oxford's housing needs.</p>
PR-A-086	Turley / Bovis Homes Ltd	4	<p>Additional growth in the District should achieve the following key principles:</p> <ul style="list-style-type: none"> - limiting growth in rural settlements and directing it towards the most sustainable settlements, such as Banbury; - maximising the regeneration of Banbury; - protecting the Green Belt from inappropriate development
PR-A-086	Turley / Bovis Homes Ltd	5	<p>The vision should seek to accommodate additional housing growth in a way that complements the Local Plan Part 1's strategy to focus the bulk of growth in and around Banbury.</p>
PR-A-086	Turley / Bovis Homes Ltd	6	<p>We do not believe that the plan area or 'area of search' should be determined on distance proximity to Oxford (i.e. the southern part of the District). The Oxfordshire SHMA confirms that the Housing Market Area (HMA) comprises the entire County. Public transport services across the District provide fast and sustainable access to Oxford. It is therefore considered that the plan area or 'area of search' should include land surrounding settlements such as Banbury which benefit from excellent public transport connections to Oxford.</p>
PR-A-086	Turley / Bovis Homes Ltd	7	<p>The following factors should be considered:</p> <ul style="list-style-type: none"> - accessibility by public transport; - existing commuting patterns; - the Cherwell settlement hierarchy.
PR-A-086	Turley / Bovis Homes Ltd	8	<p>A district-wide area may not be appropriate, however there is justification for a plan area or 'area of search' wider than the southern part of the District. Reflecting our response to Question 7, the area should include land surrounding Banbury.</p>
PR-A-086	Turley / Bovis Homes Ltd	9	<p>An area based solely on the extent of the Oxford Green Belt within Cherwell District would not be appropriate. It would result in a significant loss of Green Belt and would lead to the unrestricted sprawl of the built up area of Oxford, contrary to national policy.</p>
PR-A-086	Turley / Bovis Homes Ltd	10	<p>In accordance with the NPPF Cherwell should identify a sufficient supply of sites over the plan period to contribute to meeting Oxford's unmet need and identify and update annually a supply of deliverable sites sufficient to provide five years' worth of housing against the housing requirements with an additional buffer.</p>
PR-A-086	Turley / Bovis Homes Ltd	11	<p>There are no separate housing market areas 'Within Cherwell and housing needs do not exist separately between the land adjoining Oxford and the Rest of the District. Accordingly five year supply in Cherwell should be tested on a District 'Wide basis.</p>
PR-A-086	Turley / Bovis Homes Ltd	12	<p>As indicated in our responses to Questions 7 & 9, other areas of the district such as Banbury and the land surrounding the settlement warrant consideration on account of the availability of excellent public transport links with Oxford, high levels of sustainability (relative to rural areas to the south of the District) and its location outside the Green Belt</p>

PR-A-086	Turley / Bovis Homes Ltd	14	We believe that one of the main objectives should be: - to accommodate new development so that it maintains the Green Belt and prevents the urban sprawl of Oxford.
PR-A-086	Turley / Bovis Homes Ltd	15	Site submission - Land off Warwick Road, Banbury. Bovis Homes is control of a 20 hectare site to the north of Banbury adjoining the recently approved Pers mmon Homes development accessed from Warwick Road. As detailed in our Call for Sites submission the site is available and developable. It is situated within 3.5km of the town centre and is well placed to benefit from high quality public transport services to Oxford.The site is not in the Green Belt In comparison with rural areas to the south of the District within the Green Belt, it is an appropriate and sustainable strategic housing site to meet Oxford's unmet needs.
PR-A-086	Turley / Bovis Homes Ltd	17	The NPPF reognises the need to locate development where the use of sustainable transport modes can be maximised. In this respect the adopted Local Plan locates the majority of new development at Banbury where there where is an excellent levelof public transport infrastructure. The Government's plans to electricity the rail line through Banbury as well as other improvement proposals will further enhance this infrastructure.The availability of high quality transport infrastructure in Banbury and its excellent connections with Oxford should therefore be a key consideration in determining the location of development to meet Oxford's unmet needs.
PR-A-086	Turley / Bovis Homes Ltd	19	In comparison with other settlements in the District, Banbury contains the necessary infrastructure to support additional development to meet Oxford's unmet needs.
PR-A-086	Turley / Bovis Homes Ltd	21	Reflecting existing commuting patterns, Banbury has a strong economic relationship with Oxford and represents an appropriate settlement to accommodate its unmet needs.
PR-A-086	Turley / Bovis Homes Ltd	23	Additional growth to meet Oxford's unmet needs should be located around Banbury as it represents a sustainable location, where the need to travel can be minimised and the use of sustainable travel options can be encouraged.
PR-A-086	Turley / Bovis Homes Ltd	25	New development to meet Oxford's unmet needs should be directed to locations which minimise the loss of important and valued natural and landscape environment
PR-A-086	Turley / Bovis Homes Ltd	27	New development to meet Oxford's unmet needs should be directed to locations which protect and enhance the District's heritage assets.
PR-A-087	J Rendle	1	No. It is derived from the Oxfordshire SHMA which has simply been accepted by the Council and not subjected to serious independent scrutiny. The SHMA was drawn up by private consultants who largely work for the development industry and therefore have a conflict of interest. Its figures are much too high, far in excess of previous trends and clearly unrealistic. I do not accept that the SHMA figures represent either Cherwell's or Oxford's needs.
PR-A-087	J Rendle	2	No. The excessive housing figures are already based on unrealistic forecasts of growth in employment. To provide for yet more employment generating development is simply creating a vicious circle.
PR-A-087	J Rendle	9	No. Green Belt is a permanent designation. The Green Belt around Kidlington is much valued. National Policy says that housing need is not a reason to build on the Green Belt. The Government, in its manifesto, made a commitment to protect the Green Belt.
PR-A-087	J Rendle	16	Transport networks in this area are already overloaded. I do not believe that current proposals will solve existing problems, let alone those caused by additional growth in Cherwell and elsewhere in the County. The Highway Authority's vision and objectives, that you quote, are vague aspirations and without substance.
PR-A-087	J Rendle	24	Finding sites for a further 3500 houses in addition to the excessive number already included in the Local Plan will further damage the natural environment of Cherwell.
PR-A-088	Barton Willmore / Ptarmigan	28	Site submission - Land North and South of A34 / West of M40 Junction 9

PR-A-088 Barton Willmore / 6-9
Ptarmigan

Although further evidence will be needed, the issues identified in section 3 begin to highlight a set of key principles for meeting Oxford's unmet need in Cherwell. These are as follows:

- a) In order to ring fence the housing requirement from Oxford's unmet need, the Council, working with its neighbouring authorities, should develop an effective, continuous ring fence policy area.
- b) Meeting the unmet need of Oxford in Cherwell should deliver benefits to both the district and the City. The scale of the allocation for unmet should therefore enable the delivery of significant infrastructure to achieve this.
- c) The location of the unmet need should have a strong relationship with Oxford and be on the knowledge spine, so as not to undermine the existing plans and strategies for Oxfordshire.
- d) The plan review should also consider unmet employment needs from the City.
- e) Meeting the unmet need should address existing connectivity issues between Cherwell and Oxford, the A34 being the most significant.
- f) The local plan review should consider the delivery of a regional scale sport and leisure facility.

PR-A-088 Barton Willmore / 1, 10+11
Ptarmigan

Ptarmigan supports the Council's pro-active approach for reviewing their local plan at this time, which accords with the requirement of the Inspector into the recently adopted Local Plan, where an early review would be required to address the unmet needs of Oxford. Although the Oxfordshire Growth Board's work on apportioning the City's unmet need is still underway, it is encouraging to see that the Council has commenced work on the plan review.

The proposed working target of 3,500 homes follows a sensible methodology of equally distributing the unmet need equally between the districts. Ultimately though, and as acknowledged by the consultation document, this is only a working target until summer 2016 when the Growth Board work concludes. The working target should therefore not be used to predetermine the outcome of a thorough sustainability assessment of locations for growth across the county. (cont...)

PR-A-088 Barton Willmore / 1, 10+11
Ptarmigan

(cont...) Notwithstanding the above this housing distribution clearly should not include Oxford City as referenced in the consultation document:

"Were this figure [15,000] to be distributed evenly between Oxford, Cherwell, West Oxfordshire, South Oxfordshire and Vale of White Horse Councils, this would produce a requirement of some 3,000 homes per authority area." (Our emphasis, Paragraph 2.16)

As Oxford City cannot meet its own need, the 15,000 'overspill' cannot realistically be apportioned back into Oxford. By its very nature, if the city were able to provide for this housing need, it would have done so. We would therefore recommend a working figure of at least 4,250 homes for Cherwell district. This is based on 15,000 homes distributed evenly between Cherwell, South Oxfordshire, West Oxfordshire and the Vale of White Horse (3,750) plus an additional 500 homes (as per Cherwell's own assumed uplift). (cont...)

PR-A-088 Barton Willmore / 1, 10+11
Ptarmigan

(cont...) However, given the district's excellent connections and relationship to Oxford such as the A34, M40, Cherwell Valley and Varsity Rail Lines, and Sustrans Routes make it a strong candidate for addressing a significant proportion of Oxford's unmet need, potentially a higher proportion than the other Oxfordshire authorities.

Cherwell will need to continue to work with the other Oxfordshire authorities to complete this process. It is Ptarmigan's view that those locations with the strongest relationship to Oxford should be allocated a higher proportion of unmet need. Cherwell appears to meet this criterion. Nevertheless, this work will need to be informed by a county-wide sustainability appraisal and evidence gathering exercise before a conclusion on the apportionment can be reached. (cont...)

PR-A-088 Barton Willmore / 1, 10+11
Ptarmigan

(cont...) The unmet need apportioned to Cherwell should be treated as its own discrete housing land supply area (separate from Cherwell's own needs) to ensure that these homes are delivered in an area that relates strongly to Oxford City. In the event of these allocated homes not coming forward, it would be inappropriate for the unmet need to then be met in areas with a poorer relationship with Oxford (for example Banbury and the north of the district). It would therefore be appropriate for Cherwell to adopt a housing land supply ring fence to prevent such an occurrence. A similar approach has been adopted by South Oxfordshire District Council and is proposed by the Vale of White Horse for housing growth in Science Vale.

In order for the district to maintain a ring fence for Oxford's unmet need these homes should be in as a fewer locations as possible. A non-contiguous ring fence area across many sites would also not be appropriate. This approach was proposed by the Vale of White Horse in their draft local plan, but following Examination in Public has decided to redraft a much wider ring-fence area. For more information please see:
http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=530303947&CODE=FA1A7015F2CA84616CBFD2A48851C7B8

PR-A-088 Barton Willmore / 2-9 and 12-
Ptarmigan 27

It is well rehearsed that Oxford has severe affordability issues (the greatest in the UK, including London) and it cannot meet its own housing needs within its boundary. Cherwell has accepted this point and is proactively working with its neighbouring authorities to address this issue. It is Ptarmigan's view that there are six key issues arising from Oxford's unmet need which need to be addressed through the Local Plan review and each are taken in turn below.

Issue 1: Accepting unmet need from Oxford is likely to be unpopular: Although political opinion is not necessarily a material consideration in the planning system, it is important to address this point. Cherwell should be attempting to allocate unmet need in locations that addresses issues for both Oxford and Cherwell. In some instances this may not be spatially specific – for example addressing affordability issues in Oxford would in the most part be addressed by increasing the amount of stock available, it wouldn't matter per se, where this is located. However, in other instances due to the scale of unmet need, there will be opportunities for development to provide solutions to longstanding issues through the delivery of associated "game changing" infrastructure. These are addressed in the remaining issues. (cont...)

PR-A-088 Barton Willmore / 2-9 and 12-
Ptarmigan 27

(cont....) Issue 2: Locating development where it won't undermine existing strategies: Cherwell's existing local plan focusses development at Banbury, Bicester and the former RAF Upper Heyford. These locations for growth are partially informed by, and reflected in other documents such as the Oxfordshire Strategic Economic Plan, Local Transport Plan 4, Growth Deal, and City Deal. These strategies aim to deliver the significant economic potential of Oxfordshire, mainly in the Knowledge Economy sectors. Spatially, these are located at Bicester, Oxford and Science Vale, conveniently following the route of the A34 / Cherwell Valley Railway Line, known as the 'Knowledge Spine'.

Key to supporting Oxfordshire's growth is connectivity between the three hubs along the knowledge spine (Strategic Economic Plan, 2014). As such substantial local and central government, and private sector funding has been levered in through the Oxford and Oxfordshire City Deal to facilitate connectivity along the knowledge spine. Allocating development in a location with a poor relationship to this key route would not only undermine these strategies, but would miss a golden opportunity to further enhance and improve this key corridor. By contrast, locating development within the 'knowledge spine' offers the opportunity to assist with such infrastructure delivery and offer a step change to the economic growth of this area. (cont...)

PR-A-088 Barton Willmore / 2-9 and 12-
Ptarmigan 27

(cont....) Issue 3: The type of homes and their relationship with Oxford: Although it is impossible for the planning system to ensure the homes built to meet Oxford's unmet need are occupied by Oxford workers, it is important that the location and type of homes are tailored to their needs. Connectivity is explored further below, but in terms of typology, Barton Willmore has undertaken research on existing household types across Oxford:

- Rental hubs (27%)
- City prosperity (17%)
- Family basics (13%)
- Urban cohesion (11%)
- Domestic success (9%)
- Others (23%)

This research will need further exploration as to how these household types are translated into house typology, but it forms a good starting point for this work. It is apparent that there will be a high demand for rental properties, key worker housing, linked to the largest employment sectors of health and education, starter homes as well as executive homes for business leaders. (cont....)

PR-A-088 Barton Willmore / 2-9 and 12-
Ptarmigan 27

(cont....) Issue 4: A lack of employment land in Oxford: As set out in Issue 2, it is important that addressing unmet housing need does not undermine the other strategies for Oxfordshire. As set out in the NPPF (paragraph 179), local planning authorities need to consider all development requirements (not just homes) when fulfilling their duty to cooperate.

Oxford City's SHLAA only considers land for housing development, and as far as Ptarmigan is aware, there has been no such study to assess the City's employment capacity. However, given the stress on capacity for housing, it would be fair to assume that such issues exist for employment also. Indeed this is referenced in the Oxfordshire Innovation Engine Report:

"...there is a shortage of suitable premises for firms in Oxford city centre, which has seen only two minor office developments in the last 20 years. Two small serviced office facilities and the City's only innovation centre are fully occupied with waiting lists...

...even allowing for the remaining development potential on other sites (notably Oxford Science Park and Oxford Business Park), demand will continue to outstrip supply in Oxford. Therefore, some outward expansion of the City is essential if it is to fulfil its important role in supporting high tech business growth ..."
(SQW, Oxford Innovation Engine, Para 26, 2013) (cont....)

PR-A-088 Barton Willmore / 2-9 and 12-
Ptarmigan 27

(cont....) It is therefore important that sufficient employment land is also allocated to support the growth of Oxford. As with addressing unmet housing need, this should be located in an area with a strong relationship to the City.

Issue 5: Connectivity: It is important that any unmet need arising from Oxford (both housing and employment) has strong connections to the City. This is also important to the districts' own spatial strategies, since the relationship between Bicester, Science Vale and Oxford is critical to knowledge economy growth:

"The capacity of the road and rail links between the three centres (Oxford, Bicester, and Science Vale) , and their wider regional and national connectivity, is crucial to ensuring the spatial strategy works." (SQW, Oxford Innovation Engine, Para 27, 2013)

It is a well-known fact that the A34 is a constraint to connectivity and subject to frequent delays and accidents. Highways England identify the stretch of the A34 within Cherwell as having capacity and safety issues (Highways England, Solent to Midlands Route Strategy, Figure 2, 2015). Similarly, the Strategic Economic Plan and the Local Transport Plan 4 both identify the A34 as a constraint to innovation led growth. (cont....)

PR-A-088	Barton Willmore / Ptarmigan	2-9 and 12- 27	<p>Relating back to Issue 1 (delivering benefits for both Cherwell and Oxford) and Issue 2 (not undermining other strategies), it is important that any allocation for unmet housing need in Cherwell is used to address this fundamental challenge to meeting both the district's and the city's own growth potential.</p> <p>In addition to contributing to the resolution of longstanding issues on the A34, it is important that new development is well related to Oxford and can benefit from short journey times into the city. Any such new development site should utilise opportunities for high speed public transport (bus and rail) into the city centre, but also utilise cycle routes as an alternative to vehicular travel, drawing upon the city's propensity for cycle and public transport use.</p> <p>Issue 6: Sport and Leisure: Ptarmigan consider there to be a lack of a sports and leisure offer across Oxfordshire, particularly the absence of a 'regional' scale facility such as a velodrome, high quality international standard swimming pool or specialised sports village. Arguably, Oxfordshire's only regional sports facility is the Oxford Ice Rink in the city centre, which according to the City Council's West End AAP is "life-expired" and would require complete redevelopment. (cont...)</p>
PR-A-088	Barton Willmore / Ptarmigan	2-9 and 12- 27	<p>(cont...) A new regional sports and leisure facility in Cherwell could be enabled by the development of around 4,000 new homes of Oxford's unmet need. The new facility would be a benefit to Cherwell by acting as a regional attraction, bringing visitors into the district, thereby offering tourism growth potential, while still addressing an unmet need of the County as a whole.</p> <p>As with the other issues, addressing such needs requires a location with a strong relationship and connectivity to Oxford.</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	1	<p>The figure of 3,500 homes significantly underplays the contribution that Cherwell must make in meeting, in part, Oxford's unmet housing needs.</p> <p>It is important that the Part 1 partial review seeks to address in full Cherwell's contribution towards meeting Oxford's unmet housing needs. The partial review must do so if it is to be positively prepared (based on a strategy which seeks to meet objectively assessed development requirements including unmet requirements from neighbouring authorities).</p> <p>By way of context, the Inspector in the Cherwell Local Plan Part 1 Examination was absolutely clear that an early partial review is necessary in order to deal with Oxford's unmet housing needs. This issue was of such significance to the soundness of the Part 1 Plan as to put at risk the entire Part 1 Plan. As the Council may recall there were numerous legal and other representors at the various hearing sessions to the Local Plan Part 1 Examination making robust submissions to the Inspector that Oxford's unmet housing need should be addressed in the Part 1 Plan rather than being left to a partial review. The Inspector ultimately accepted that the Local Plan Part 1 should be taken forward to adoption and that dealing with Oxford's unmet housing needs could be by way of partial review, but by no means should the Council regard the partial review as a light touch in order to address the Inspector's reasonably significant concerns on the Duty to Co-Operate in the Local Plan Part 1. (cont...)</p>

PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	1	<p>(cont...) Indeed, Cherwell is an area where housing issues are acute. There is a significant housing requirement arising from Cherwell itself, without considering unmet needs from neighbouring authorities. The Council promoted the Local Plan Part 1 on the basis of an OAN which the examination Inspector initially considered was too low. The Council do not have a five year housing supply. Furthermore, the Council have persistently under delivered housing and consequently are a 20% authority in NPPF terms.</p> <p>For these reasons, the partial review must critically consider the proportion of Oxford's unmet housing needs to be delivered in Cherwell.</p> <p>Turning to deal with why the 3,500 houses is substantially below that which Cherwell must accommodate, there are a variety of variables to consider.</p> <p>Firstly, the Oxfordshire SHMA 2014 indicates that applying a mid-point of the range equates to 1,400 houses per annum, equating to 28,000 houses to 2031. We would set out that applying a mid-point of the range does not fulfil the requirement for the Plan to be positively prepared since the requirement is to meet the full objectively assessed housing needs whereas the mid-point would be delivering partial objectively assessed housing needs. (cont...)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	1	<p>(cont...) In our view therefore, the annual requirement to be considered is 1,600 dwellings, equating to 32,000 houses to 2031.</p> <p>Secondly, the Oxford City SHLAA 2014 indicates that the City are able to deliver 10,200 (rounded) dwellings. This leaves a residual unmet requirement to be identified in neighbouring authorities of 17,800 (rounded) dwellings applying the mid-point or, if the appropriate full objectively assessed housing needs are to be accommodated as required by the NPPF, 21,800 (rounded) dwellings.</p> <p>Thirdly, it is then necessary to consider the spatial distribution of the unmet housing need. In this regard paragraph 2.16 of the Issues Consultation is fundamentally flawed for two reasons. Firstly, the paragraph assumes that the unmet housing need is to be distributed evenly between the neighbouring authorities which has no regard to a range of factors including ability to deliver growth, locational aspects, planning policy constraints such as Green Belt, and infrastructure constraints. Furthermore, the paragraph is flawed because it assumes that Oxford is able to accommodate its own unmet housing need which is something of a perverse approach given that the City have already set out what housing they can accommodate and what housing needs to be exported under the Duty to Co-Operate. Utilising the Council's broad approach, this would equate to approximately 3,000 houses to be accommodated within Cherwell, based on the mid-point OAN and assuming that Oxford will be absorbing its own unmet housing need. (cont...)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	1	<p>(cont...) The correct approach is to apply the unmet housing across the neighbouring authorities and exclude Oxford City, such that the unmet needs should be distributed between Cherwell, West Oxfordshire, South Oxfordshire and Vale of White Horse and utilise the full objectively assessed needs rather than the mid-point. If even distribution were considered appropriate in this scenario, this would equate to Cherwell having to accommodate 5,450 dwellings in the period to 2031 as part of the Part 1 partial review.</p> <p>However, even distribution is not appropriate in this instance. Indeed, this is recognised in paragraph 2.17 of the Issues Consultation where the Council suggest an additional 500 houses as a 'working figure' for Cherwell. We consider this significantly underplays the benefits of focussing development on Cherwell, particularly in the context of Bicester which is functionally and physically related to Oxford, a major location which the Part 1 Local Plan Strategy sets out is to be the primary focus for growth and crucially is excluded from the Green Belt. The advantage Cherwell have with Bicester provides compelling evidence that Cherwell should accommodate significantly more housing than the other three neighbouring authorities. However, even applying the Council's cautious additional 500 houses as a 'working figure' would equate to Cherwell needing to accommodate 5,950 houses through the Part 1 review in the period to 2031.</p>

PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	2	<p>The NPPF is clear that there is a duty on Councils to meet, and deliver, objectively assessed housing and other needs in a Plan period.</p> <p>We read this ‘other needs’ as meaning a range of development requirements including employment.</p> <p>Co-locating housing and employment is an inherently sustainable approach to delivering development, given that commuting is the single biggest influence on trips and particularly car borne movements.</p> <p>Given the scale of additional housing to be accommodated within Cherwell, as set out in response to Question 1 above, it is therefore necessary for Cherwell to consider additional employment land. (cont...)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	2	<p>(cont...) The precise quantum of employment land requires consideration in the context of a strategy for accommodating Oxford’s housing needs. As will be seen to be a common theme throughout these submissions, we consider that Bicester should be the focus for accommodating additional housing growth, one of the advantages of Bicester is that it benefits from significant quantities of employment and tourism (which is an important economic driver for the District) land already and therefore focusing additional housing on Bicester reduces to some extent the quantum of employment land that is necessary to provide for balanced, sustainable communities.</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	3	<p>In our view, the single biggest issue to be considered in making a significant contribution to meeting the City’s unmet housing need is to protect the Green Belt.</p> <p>Paragraph 83 of the NPPF is clear that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy and, importantly, once established Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the local plan.</p> <p>Underpinning this approach is the permanence of Green Belt. It is wholly unacceptable to undermine Green Belt by making regular amendments to boundaries which can appear to be unplanned and ad hoc in approach. As paragraph 83 to the NPPF makes clear, Green Belt boundaries should have permanence in the long term so that they should be capable of enduring beyond the plan period. (cont..)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	3	<p>(cont...) In considering Green Belt, and when defining boundaries, local authorities are required by paragraph 85 of the NPPF to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable developments. In this instance there are opportunities to deliver objectively assessed needs in a sustainable manner without boundary changes to the Green Belt. One such example of this is to focus development on Bicester which the adopted plan strategy makes clear is the focus for development in Cherwell in the period to 2031. Whilst being physically and functionally related to Oxford, and geographically close to the City, Bicester is unencumbered in relation to Green Belt as distinct from for example Kidlington and Yarnton (notwithstanding that Kidlington and Yarnton are lower order settlements with facilities and services meeting a local rather than district, national and international catchment as is the case with Bicester).</p>

PR-A-089 Cerda Planning Limited / Greenlight Developments Limited	3	<p>(cont...) At the heart of Part 1 partial review, in our view, are two key aspects; firstly, in accordance with the NPPF, the need to meet and deliver full objectively assessed housing needs – if the partial review of the Local Plan were to meet anything less than full objectively assessed housing needs it would not be positively prepared and faces a significant risk of ultimately not being found sound, an approach which examination Inspectors will take as evidenced in Aylesbury Vale, Stratford and very recently, Warwick. Secondly, only in exceptional circumstances, where all other opportunities for delivering sustainable growth have been exhausted, should the Green Belt be amended. In this case Cherwell are in the enviable position of having an adopted plan strategy focusing the majority of development on Bicester which is outside the Green Belt but close to Oxford City; given that this is a partial review rather than a wholesale review of the Local Plan, the most appropriate approach is to utilise all that is good about the adopted Local Plan and which was found sound in terms of plan strategy, overall development approach and distribution and knit in the additional housing arising from Oxford’s unmet housing needs to that existing sound strategy.</p> <p>By any objective assessment this results in Bicester being the focus for accommodating Oxford’s unmet housing needs.</p>
PR-A-089 Cerda Planning Limited / Greenlight Developments Limited	4	<p>In responding to this question, it is appropriate to consider what the principles and goals set out within the adopted Local Plan seek to achieve, amend these as appropriate, and apply them to the additional growth in the District.</p> <p>In this respect the principles and goals should be;</p> <ul style="list-style-type: none"> - Remaining economically competitive. - Ensuring housing growth only takes place in appropriate locations where development meets the three strands to sustainable development as set out in the NPPF (the economic, social and environmental roles). - Avoiding sprawl and ensuring growth avoids adverse environmental impacts. - Avoids releasing Green Belt land. - Ensuring the changing needs of the population are properly planned for. - Reducing the high cost of energy use. - Ensuring that infrastructure needs are met.
PR-A-089 Cerda Planning Limited / Greenlight Developments Limited	5	<p>In responding to this question, it is important to have in mind the vision for Cherwell District set out from paragraph A.8 of the adopted Local plan which, in summary requires all residents to enjoy good quality of life; that Cherwell will be more prosperous than it is today; and for those who live and work in Cherwell to be happier, healthier and feel safer.</p> <p>The nine bullet points which comprise the adopted Vision apply to the Part 1 partial review as they do to the adopted Local Plan.</p> <p>However, the Part 1 partial review should include within its vision an additional bullet point as follows;</p> <ul style="list-style-type: none"> - “The Green Belt will be protected from development since the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and Green Belt boundaries should only be adjusted in exceptional circumstances which do not apply in Cherwell. Beneficial use of the Green Belt in terms of access, opportunities for outdoor sport and recreation and to retain and enhance landscapes, visual amenity and bio diversity will be taken wherever possible”.

PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	8	<p>For the reasons set out at question 6 above, a District wide area of search would not be appropriate.</p> <p>There are a variety of reasons why this is so.</p> <p>A District wide area of search runs the risk of being counter to the adopted plan strategy which, for example, seeks to place very little reliance upon many parts of the District which are rural in nature. Furthermore, a District wide approach would incorporate within the area of search Green Belt, the boundaries of which should only be amended in exceptional circumstances. It should also be noted that Cherwell, being a predominately rural District, is expansive in area and there are significant parts of the District which have no relationship whatsoever with Oxford and indeed lie on the very periphery of the strategic housing market area.</p> <p>For these reasons, a more focused area of search, having regard to our submissions in respect of question 6 above, is the appropriate strategy.</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	9	<p>It should be recognised that underpinning the partial review is the need to identify and deliver full objectively assessed housing needs being exported from Oxford City through the Duty to Co-Operate.</p> <p>Delivering anything less than full objectively assessed housing needs will render the partial review not positively prepared and, consequently, it will fail the tests of soundness.</p> <p>If the only option for delivering full objectively assessed housing needs in a sustainable manner were to be to focus development on the Oxford Green Belt then it would be necessary to look solely at the Green Belt as the only option for growth.</p> <p>However, as we have set out, the Oxford Green Belt is not the only option for growth. Green Belt boundaries should only be amended in exceptional circumstances. For the plan to be found sound it must be justified – that being that the plan is the most appropriate strategy when considered against the reasonable alternatives. There are reasonable alternatives to focusing growth on the Oxford Green Belt, one such option being Bicester which is functionally and physically related to Oxford whilst being close to the City boundary yet unencumbered by Green Belt policy. (cont...)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	9	<p>(cont...) It is noteworthy that the Inspector in coming to his conclusions on the soundness of the now adopted Local Plan, in the face of significant pressure from various legal and other representors in the examination hearings, promoting the need for an immediate Green Belt review, was content to allow the Cherwell plan to go forward to adoption with the caveat that a Partial Review be undertaken promptly. As part of the Inspector's indications to the Council, he in no way indicated that the Partial Review should be focused only on the Oxford Green Belt but instead, and quite rightly, indicated that a Green Belt review should be considered as part of the Partial Review – to do otherwise would put the Partial Review at risk of not being justified since an alternative would have been discounted before the partial review made it even to Issues Consultation stage.</p> <p>There is nothing therefore in the background to the Partial Review that indicates that the Partial Review should be focused solely on the Oxford Green Belt and for the reason set out elsewhere in these submissions there is no justification for utilising Green Belt at all let alone focusing the area of search on the Green Belt in isolation.</p>

PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	10	<p>It would be inappropriate for a specific five year supply to be calculated relating solely to Oxford's housing needs.</p> <p>It is material to have regard to the approach being taken. It is right and proper under the Duty to Co-Operate for Cherwell to accommodate, in part, Oxford's unmet housing needs. Indeed it is a requirement upon the Council imposed by the Local Plan Inspector. Whilst the housing needs may not arise from Cherwell, they are, nevertheless, being accommodated within Cherwell. Furthermore, it is Cherwell's plan which is being partially reviewed; it is not an Oxford City Plan which is overlapping and taking in administrative areas within Cherwell.</p> <p>For these reasons, and for the purposes of plan making, Oxford's housing needs are being addressed by Cherwell. It follows therefore that Cherwell are accepting accommodating Oxford's housing numbers in their administrative area, and the NPPF does not set out that there is any justification for applying anything other than a District wide five year supply calculation.</p> <p>This issue, essentially one of disaggregation has been considered elsewhere, The Ottery St Mary, Devon appeal (ref APP/U1105/A/12/2180060) is helpful since the issue with disaggregation was considered by the Inspector determining an appeal for 130 dwellings and associated works. In that appeal the Inspector, whilst recognising an approach to sub housing areas across the District made clear that no development plan or national policies advocate a disaggregated approach. (cont...)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	10	<p>(cont...) A similar approach was taken in respect of an appeal at Huncote, Leicestershire (ref APP/T2405/A/13/2198620) where the Inspector considered that housing supply should be accessed across the District as a whole and that it would be wrong to argue that any sufficiency of housing land in one housing sub area, set against a five year target, should be used in the absence of a district wide supply to block development in another sub housing area.</p> <p>Furthermore, whilst the final strategy for accommodating Oxford's unmet housing needs is to yet to be determined, it will ultimately be that Oxford's housing will be blended into other housing requirements across Cherwell's sustainable locations which in our view should avoid any Green Belt release. It would be virtually impossible, and certainly not practical, to monitor housing delivery across Cherwell and seek to extrapolate from this whether housing is being brought forward to meet Cherwell's needs or Oxford's needs. This is particularly the case with windfall development as opposed to strategic development sites.</p> <p>Consequently, a unified District wide housing monitoring and supply calculation should be applied.</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	11	<p>It is firstly relevant to note that in promoting the Local Plan to the examination Inspector, Cherwell considered that it had a five year housing supply.</p> <p>How the adopted Local Plan performs against the predicted housing trajectory is a matter for the Council, whose role it is to ensure that there is a rolling five year supply and to address any deficiencies if they are to avoid their plan being rendered out of date, so far at least in relation to housing supply policies.</p> <p>In the same way that Cherwell has to be content that the Plan they are promoting will ensure a five year housing supply for Cherwell's housing needs, so too must Cherwell be content that the partial review, including Oxford's unmet housing needs, will similarly ensure there is a five year housing supply.</p> <p>There are two fundamental points to raise in relation to this consideration. Firstly, in assessing what sites to be allocated to bring forward Oxford's unmet housing needs in Cherwell, the District council must provide for a range of sites including not only strategic sites but also smaller sites which are unencumbered by infrastructure and other considerations and which can, as a consequence, be brought forward early in the Plan period so as to best ensure a five year housing supply is achieved. (cont....)</p>

PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	11	<p>(cont...) Secondly, the Council should take a pragmatic approach to delivering development. It is inappropriate to delay delivering housing whilst the Partial Review progresses through consultation and adoption. To do so will cause the Council not to have a five year housing land supply, given that in accordance with the recent West Berkshire case, the new objectively assessed need figure is to be applied in decision taking ahead of adoption of the plan. The Council should have in mind the Ministerial Foreword to the NPPF which is clear that sustainable development should proceed without delay; consequently, sites which accord with the plan strategy, and which are capable of delivering Oxford's housing needs should be permitted ahead of adoption of the Plan in order that delivery can keep pace with the annual requirement arising from the significantly uplifted objectively assessed needs which should immediately be applied in the five year housing supply calculation.</p> <p>If the Council apply this approach they minimise the risk of bullet point 4 to paragraph 14 of the NPPF engaging.</p>
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	12	<p>There are a number of key points to arise in relation to this question.</p> <p>Green Belt release is already planned for Oxford's Northern Gateway site adjacent to the A34 and the Peartree Park and Ride, it should be noted that even with the improvements to the A34 and the Peartree interchange, this area of the strategic highway network remains challenging with regular and significant congestion both in the a.m. and p.m. peaks but also across many parts of the day. Infrastructure capacity in this location is therefore a key constraint.</p> <p>Kidlington has a role as an employment and service centre however, as set out within the adopted Local Plan this meets local needs only. It is also a location which is surrounded on all sides by Green Belt.</p> <p>Yarnton is similarly surrounded on all sides by Green Belt and is a lower category settlement compared to, for example, Bicester.</p> <p>Begbroke is only partially constrained by Green Belt but is a smaller settlement than both Kidlington and Yarnton and similarly serves only local needs. (cont...)</p>
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	12	<p>(cont...) In contrast, Bicester is situated approximately 15 kilometres from Oxford City. Bicester is identified in adopted plan strategy as being the main focus for growth. A similar approach should be applied in the Partial Review for consistency. Bicester has two railway stations, both providing services to Oxford City, one of the stations (Bicester Village) has recently undergone a multi-million pound redevelopment. The adopted Local Plan is clear that Bicester is a key settlement for Cherwell, and furthermore tourism is an important component to economic growth in the District which is focused on Bicester given the national and international significance of Bicester Village.</p> <p>Crucially, Bicester is not fettered by Green Belt.</p> <p>There are a range of supporting villages across Cherwell in proximity to Oxford a number of which lie outside the Green Belt. However, the adopted Local Plan is clear that the rural areas of the District are not to be relied upon for any significant housing growth in the period to 2031, and any growth in nearby villages should be very limited if it is to be consistent with the adopted Plan strategy and is to meet sustainable development objectives. Fritwell for example, being one of the villages referenced in the Partial Review, contains limited bus services, a primary school, shop (which does not open on evenings, Saturday afternoons nor Sundays) and a village hall, which is a very limited range of facilities and can in no way be compared with the regional, national and international status of Bicester.</p>

PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	13	<p>As set out elsewhere in these submissions, the Council are embarking upon a Partial Review. This is not a wholesale review of the adopted Local Plan. Consequently, it is important that the Partial Review seeks to build upon what is good and sound in the adopted Local Plan, and apply additional growth requirements to this. Thus, consistency with the adopted Plan should be key.</p> <p>In this regard it is appropriate to have in mind the adopted strategy for Cherwell. In summary, this is most of the growth in the District will be directed to locations within or immediately adjoining the main towns of Banbury and Bicester.</p> <ul style="list-style-type: none"> - Bicester will continue to grow as the main location for development within the District within the context of wider drivers for growth. - Banbury will continue to grow, albeit to a lesser extent than Bicester, in accordance with its status as a market town within a rural hinterland. - Kidlington's centre will be strengthened and its important economic role will be widened, albeit there will be no strategic housing growth at Kidlington. - Growth across the rest of the District will be much more limited and will focus on meeting local community and business needs. - Development in the open countryside will be strictly controlled. <p>It is for these reasons that throughout these submissions, the approach being taken is that Green Belt release is to be avoided and that growth is to be focused upon Bicester.</p>
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	14	<p>The adopted Local Plan sets out a series of objectives relating to housing which can usefully be applied to the Partial Review seeking to meet Oxford's unmet housing needs within Cherwell. Of particular relevance are the following;</p> <ul style="list-style-type: none"> - The need to make market housing more affordable – delivering supply to meet demand, through meeting full objectively assessed housing needs, will assist in achieving this objective. - The need to provide more family housing. - The need to meet the requirements of a relatively young population together with the needs of an ageing population. - The need to protect and enhance the identity of Cherwell's Towns and Villages, to maintain or create a sense of belonging and improve social cohesion. - The need to deliver affordable housing and increase the proportion of the housing stock that comprises social housing. - To achieve housing delivery without removing land from the Green Belt.
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	17	<p>The factors set out in response to question 16 above provide compelling evidence. Cherwell is a predominantly rural District, the adopted Plan strategy seeks to significantly restrict development to the rural settlements and, as a consequence, focused development on the two main locations being Bicester and Banbury.</p> <p>For the purposes of the Partial Review, which seeks to deal with Oxford's unmet housing needs, it is self-evident that in transportation terms Bicester is a far superior location and when considered against the reasonable alternatives, must be considered as the primary focus for accommodating Oxford's unmet housing.</p>
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	19	<p>The submissions made above provides clear and compelling evidence that Bicester is capable, in infrastructure terms, to accommodate significant additional housing in order to meet Oxford's unmet housing needs. Locating development at Bicester would be consistent with the adopted Plan strategy, as a result the Partial Review would be consistent with the adopted Local Plan which was found sound only last year.</p> <p>When considered against the reasonable alternatives, Bicester should be the focus for additional housing growth through the Partial Review.</p>

PR-A-089	Cerde Planning Limited / Greenlight Developments Limited	20	<p>The Issues Consultation sets out that tourism is regarded as a significant contributor to Cherwell's economy. As set out at paragraph 5.86 of the Issues Consultation document, tourism is presently worth over £300 million in Cherwell District.</p> <p>Bicester is regarded as having both national and international status through primarily the Bicester Village development. Through greater integration of Bicester Village within the wider Bicester Town, which is ongoing, Bicester will be able to harness the status that Bicester Village has brought to the area. In time, therefore, tourism will become an even greater element of the Cherwell economy, and will underpin to an even greater level Bicester as a regional centre.</p> <p>The increase in tourism will inevitably create jobs and further economic growth of the town including associated leisure and retail uses and additional service sector jobs.</p> <p>In terms of meeting Oxford's unmet housing needs, it is important that a strategy is set out which supports the existing assets of Cherwell, including Bicester, and as a consequence Bicester should be the main focus for accommodating Oxford's unmet housing needs.</p>
PR-A-089	Cerde Planning Limited / Greenlight Developments Limited	21	<p>Sustainability is at the heart of plan making and decision taking. The Ministerial Foreword to the NPPF is clear that sustainable development should proceed without delay.</p> <p>What sustainable development means is embedded within the NPPF at paragraph 6, and comprises three dimensions to sustainability; the economic, social and environmental roles.</p> <p>The concept of sustainability is no longer a tick box focused primarily on location and utilising previously development land, but instead is now a broad consideration of a range of issues which inevitably creates a spectrum of sustainability. (cont...)</p>
PR-A-089	Cerde Planning Limited / Greenlight Developments Limited	21	<p>(cont...) In order for development to be considered sustainable it does not need to score highly on each of the three dimensions to sustainable development; instead within each strand there are positive and negative factors which must be weighed before concluding whether each of the economic, social and environmental roles are met; and then determine whether development, in the round, comprises sustainable development.</p> <p>The Partial Review should make clear that this is the approach to sustainability.</p> <p>It is to be noted that the delivery of housing to meet the needs of present and future generations is a consideration in both the economic and social roles to sustainable development and as such is clearly a key plank to the assessment of sustainability. Plan making and decision taking which does not take the opportunities available to deliver housing would run counter to the growth aims of the NPPF and two of the three dimensions to sustainability.</p> <p>It is for this reason these submissions set out that the delivery of housing fundamentally underpins the soundness of the Partial Review.</p>
PR-A-089	Cerde Planning Limited / Greenlight Developments Limited	23	<p>The Issues Consultation suggests that Cherwell's requirement for meeting Oxford's unmet housing needs is in the order of 3,500 houses.</p> <p>Our submissions have set out that this figure does not account for an appropriate level of Oxford's unmet housing needs.</p> <p>Whether the Council's housing figures are utilised, or ours, it is evident that green field release is required to meet housing requirements. (cont...)</p>

PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	23	<p>(cont...) This should not be seen as an unsustainable approach. As distinct from the withdrawn PPS3, there is no requirement in national policy for a brownfield first approach to locating development. Instead, the approach is to assess development options against the three strands to sustainability (these being the economic, social and environmental roles set out within the NPPF).</p> <p>It is nevertheless recognised that Cherwell contains natural environment assets which should be protected and where protection is not feasible, mitigated against impact.</p> <p>This can adequately be achieved and indeed there are areas of green field land at Bicester which are not in agricultural use let alone comprising Best and Most Versatile agricultural land which is the only grade of agricultural land which should be considered as a constraint in terms of loss in accordance with the NPPF.</p>
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	25	<p>Cherwell contains a wealth of designated and undesignated Heritage Assets. The NPPF is clear that these should be accorded protection.</p> <p>Protection can extend to the setting to Heritage Assets.</p> <p>It is important to recognise that development which affect Heritage Assets need not be excluded from a site selection process for the purposes of meeting Oxford's unmet housing needs through the Partial Review. Instead it is appropriate to consider whether any harm arises, if that can harm can be mitigated against, and whether there any other reasonable alternatives. (cont...)</p>
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	25	<p>(cont...) It is important to recognise that development close to Heritage Assets need not have an impact upon setting. Furthermore, change close to Heritage Assets can have a positive effect - for example a Heritage Asset whose setting is characterised by an urban context can be enhanced where a void site, without any built form, is brought forward for development.</p> <p>So far as Plan making in Cherwell, it has already been established through the adopted Local Plan that development in association with Heritage Assets is acceptable; Upper Heyford being one example, and RAF Bicester being another. This demonstrates the capacity for Bicester to accommodate additional housing associated with Heritage Assets without an unacceptable adverse impact.</p>
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	28	<p>Site submission - Land at Skimmingdish Lane, Bicester. The separate site submission form has been completed and a site at Skimmingdish Lane, Bicester has been put forward in the Call for Sites.</p>
PR-A-089	Cerda Planning Limited / Greenlight Developments Limited	15, 18, 22, 24, 26	<p>Strategically, Bicester is a key regional location which is the focus for development in Cherwell as set in within the adopted Local Plan.</p> <p>The adopted Local Plan strategy, seeking to focus upon Bicester, is set out in response to question 13 above.</p> <p>Bicester is a location unfettered by Green Belt. It is functionally and physically related to Oxford; the Partial Review makes clear that Bicester serves an important role with significant commuting to and from Oxford.</p> <p>Bicester is nationally and internationally renowned, the latter most obviously for its tourism offer which the Partial Review it is clear to highlight is important to the Cherwell economy.</p> <p>There is a significant concentration of shops, services and facilities in Bicester. These are being added to, for example</p>

PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	15, 18, 22, 24, 26	<p>(cont...) These is a range of additional infrastructure having already being provided or being planned for including schooling, health care, additional leisure and retail facilities, green infrastructure, highways improvements and public transport.</p> <p>Whilst the Local Plan has only recently been adopted, there is already a step change in delivery at Bicester, reflecting its status in the Plan strategy.</p> <p>Delivering additional development at Bicester would underpin the work already undertaken, and would be consistent with the adopted Plan strategy. It is a wholly justified approach.</p> <p>Importantly, there is plentiful land available in and around Bicester in order to deliver development requirements, some of which does not involve any agricultural land let alone Best and Most Versatile agricultural land. (cont...)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	15, 18, 22, 24, 26	<p>(cont...) Separate submissions have been made to the Call for Sites including land at Skimmingdish Lane, Bicester which is capable of delivering between 80 and 100 dwellings in Phase 1 of the Plan on a site within the confines of the strategic bypass to Bicester.</p> <p>It is land which is the subject of an option to proceed with immediate development and is of a sufficient size to make a meaningful contribution in the early phase of the Plan so as to assist the Council in their considerations of five year supply whilst being of a scale that is strategic in nature (given that there is nothing in any policy guidance, notably the NPPF and the NPPG, which defines what comprises a strategic site).</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	16, 18, 22, 24, 26	<p>On a strategic level, there are two key locations for growth in Cherwell; Bicester and Banbury. As set out in these submissions, Bicester lies very close to Oxford City, being approximately 15 kilometres away. Banbury, in contrast, is situated in the northern part of the District and is some distance from Oxford. It does not have any functional or physical relationship with Oxford, and whilst Banbury has a rail station the primary route and services does not pass through Oxford. In contrast, not only does Bicester have two railway stations, one of them (Bicester Village) has been the subject of a multi-million pound redevelopment and there are direct, regular and frequent services between Bicester and Oxford.</p> <p>There are also good quality bus services between Bicester and Oxford, utilising the new bus interchange facilities associated with the recently completed Sainsbury's town centre redevelopment scheme. So far as alternatives to car use, Bicester clearly offers significant advantages to Banbury. (cont...)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	16, 18, 22, 24, 26	<p>(cont..) Notwithstanding, whatever type of journey is to be undertaken (rail, bus, cycle and, as necessary, car) the length of journeys from Bicester to Oxford are significantly less than those from Banbury to Oxford. In locational terms, reducing travel distance is an inherently sustainable approach to locating development.</p> <p>Furthermore, where public transport travel times are less, this becomes a more appropriate proposition to utilising the private car.</p> <p>So far as the strategic highway network, Bicester has been the subject of significant investment with additional improvements planned as part of the adopted Local Plan. These include considerations being given to completing the strategic bypass which surrounds three quarters of Bicester. This would complement the road upgrade on the A41 between Bicester and Oxford, crossing as it does the M40 at junction 9.</p> <p>These factors, both individually and cumulatively, all indicate that Bicester is a far superior proposition to Banbury and indeed any other location within the predominantly rural District of Cherwell for accommodating Oxford's unmet housing needs.</p>

PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	6+7	<p>By way of context, it is important to have in mind that Cherwell has an adopted development plan which seeks to identify and deliver development requirements to 2031. It is a strategy which has been found sound, and was found sound only last year. It is therefore a strategy that can be relied upon.</p> <p>The sole reason for undertaking a Partial Review is to meet unmet housing needs arising from Oxford City. By implication, meeting unmet housing needs should take place in locations which relate well to Oxford. To do otherwise would be perverse and would run counter to the objectives of sustainability and run the risk of undermining, amongst other matters, social cohesion by directing housing needs some distance away from where needs are being generated. (cont...)</p>
PR-A-089	Cerdea Planning Limited / Greenlight Developments Limited	6+7	<p>(cont....) So as to ensure that these risks do not arise, it is fundamental to define an area of search or plan area in seeking to meet Oxford's unmet housing needs.</p> <p>In so doing, the area of search or plan area should be well related to Oxford.</p> <p>There are various considerations as to what is meant by well related. Matters for consideration include physical relationship – how close is the area of search to Oxford's City boundary; functional relationship – are there existing movements of people between the area of search and Oxford City; physical constraints – can the movement of people between the area of search and Oxford City take place without reliance upon the private car; planning policy considerations – is the area of search unencumbered in terms of key environmental issues such as Green Belt; consistency with adopted plan strategy – given that Cherwell are undertaking only a partial review it is important that the area of search is consistent with the adopted plan strategy which was found sound only last year.</p>
PR-A-090	Define Planning & Design Ltd	1	<p>As paragraph 2.9 of the consultation document acknowledges, "there is not currently a precise housing capacity figure for Oxford City that has been agreed by the Oxfordshire Growth Board". The use of the midpoint annual housing need assumption within the SHMA also raises concern that the need identified does not necessarily reflect the full objectively assessment needs (FOAN) as required under paragraph 47 of the NPPF. Moreover, the proposed distribution illogically assumes Oxford itself will provide an equal proportion (some 3,000) of the 15,000 homes required to meet the current needs that cannot presently be met by Oxford. This assumption is further challenged by the acknowledged physical constraints to delivering housing within Oxford as a result of its compactness and Green Belt designations.</p> <p>It is also highly unlikely that the distribution of additional housing outside of Oxford would or could be evenly distributed across the County. Indeed that does not reflect the potential constraints to and opportunities for development that will vary from one authority to the next. (cont...)</p>
PR-A-090	Define Planning & Design Ltd	1	<p>(cont...) Given this context and the awaited conclusions from the completion of countywide assessments, it is likely that future housing needs required to be met within Cherwell, as part of the wider HMA, will increase. Additionally, the size and nature of Cherwell District relative to other partner authorities within the HMA, indicates that it should accommodate a greater proportion of the unmet housing need from Oxford.</p> <p>NPPF paragraphs 156 and 157 emphasise the need for Local Plans to plan positively to meet the development needs of the area. Given the unconfirmed position on growth, the figure of 3,500 housing to be met within Cherwell District can only be a working assumption at best and is yet to be confirmed. On this basis, CDC should not use this figure to pre-empt the potential for housing delivery within the District and should use the Call for Sites exercise to comprehensively assess the potential for delivering a greater number of houses, as may be required, based upon the sustainable development principles supported through the extant policies within the adopted Local Plan.</p>
PR-A-090	Define Planning & Design Ltd	28	<p>Site submission - Land East of South Newington Road, Bloxham</p>

PR-A-090 Define Planning & Design Ltd 6-9

As has been acknowledged in the consultation document (paragraph 1.23), the SHMA concludes that the Oxfordshire HMA, which is centred on Oxford, comprises the entire County, including all of Cherwell District. As such, the area of search to identify allocations for growth should be drawn from a review of sites across the entire HMA and not restricted to those areas closest to Oxford City. On this basis, WDL propose that a District wide approach should be applied to considering additional opportunities for allocating housing land across Cherwell. This recognises (as the SHMA also acknowledges) that the District has excellent transport links (including the M40) and direct rail links from Banbury and Bicester to London, Birmingham and Oxford that supports a District wide approach.

The focus for future housing development within the HMA has already placed considerable emphasis on Oxford specifically, and indeed, Bicester and Banbury as key locations within Cherwell District. Whilst the size of those settlements and associated infrastructure justifies this hierarchy, an over emphasis and reliance upon fewer locations to provide future housing could significantly increase the risk that the identified need across the HMA will not actually be met due to the complexity of delivering high volumes of development and associated infrastructure in any one particular location. (cont...)

PR-A-090 Define Planning & Design Ltd 6-9

(cont...) The Local Plan and this Partial View explicitly affirm a commitment to ensure a proportion of the unmet needs arising in Oxford can be sustainably accommodated and that the objectively assessed housing need across the whole Oxfordshire Housing Market Area are met. As this is only a partial review of the Local Plan in order to consider how to address Oxford's unmet housing need, the aims, objectives and strategy of the extant Part 1 Local Plan remain the same, and the distribution of additional housing as a result of this review should reflect this. In particular, Part 1 of the Local Plan provides a sustainable development strategy that has been examined and adopted by CDC.

As such, the adopted Part 1 of the Local Plan provides an entirely appropriate basis and starting point for considering the most appropriate distribution of alternative sites to meet future housing need. This specifically includes consideration of the proposed settlement hierarchy, which is supported by WDL, that allows for the distribution of housing across the District.

Notably, Policy Villages 1 identifies Bloxham as a Category A Service Village where minor development, infilling and conversions would be appropriate, recognising that "there is a need for Cherwell's Villages to sustainably contribute towards meeting the housing requirements identified in Policy BSC1" (paragraph C.261). Policy Villages 2 then addresses the distribution of growth across the rural areas. The Local Plan states (paragraph C.270) "The Local Plan must set out an approach for identifying the development of new sites for housing across the rural areas to meet local needs in sustainable locations and to meet the strategic targets set in 'Policy BSC1: District Wide Housing Distribution'. (cont...)

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(cont...) Taking a District wide approach will enable the Partial Review to consider the potential for additional housing development to assist in providing other investment across the District in accordance with the hierarchy, acknowledging the relationship between growth in housing and investment in other infrastructure to support that growth. Capacity of facilities and infrastructure are a common issue around the District and County, and the solution is not to restrict the housing development required to meet the identified FOAN in otherwise sustainable locations, but to seek solutions to remedy those matters through re-planning and management and/or securing public and private sector investment in the forward planning and development management processes.

As such and in order to meet that requirement without impacting on CDC's existing development strategy for the District, CDC should apply the distribution strategy already in place within the adopted Local Plan in respect of Policy Villages 1 (village hierarchy) and Policy Villages 2 (the distribution of growth across the rural areas).

Bloxham is the largest of the Category A Service Villages, the best served in terms of community infrastructure and facilities, well related to Banbury and unconstrained by Green Belt. As such it is one of the villages in the District that is best able to accommodate future growth. The District Council's response to the Neighbourhood Plan consultation undertaken at the beginning of 2015 specifically referred to it as being a "more sustainable village than many with relatively good access to amenity and connectivity to Banbury". Consequently there should be no restriction to further sustainable development that would contribute to meeting the identified needs in the District, and those stemming from unmet need within the wider Housing Market Area, if it can be demonstrated to be appropriate within the terms of the Development Plan and NPPF policy context. (cont...)

PR-A-090 Define Planning & Design Ltd 6-9

(cont...) WDL does recognise the stated concerns in relation to the capacity of the facilities and infrastructure in the village. However, that is a common issue around the District and County, and the solution is not to restrict the housing development required to meet existing and identified future needs in otherwise sustainable locations, but to seek solutions to remedy those matters through re-planning and management and/or securing public and private sector investment in the forward planning and development management processes. Notably Policies BSC7, BSC8 and BSC9 in Part 1 of the Local Plan seeks to do precisely that in relation to education, health, and public services and utilities respectively.

As such, WDL propose that the area of search should encompass the entire District, supported by the planning policy strategy and objectives that are already in place as part of the Part 1 Local Plan to secure sustainable development, effectively building on this sustainable development strategy.

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As noted above, a core objective of the NPPF (paragraph 47) is to ensure that the Local Plan reflects and can meet the FOAN in the housing market area. As such any additional requirement stemming from the Duty to Cooperate forms part of the FOAN and should not be treated differently from other housing need. WDL therefore consider it unnecessary and inappropriate for CDC to identify a specific housing supply for meeting Oxford's needs within its own five year land supply. Furthermore there is no policy basis for separating any additional housing requirements stemming from the Duty to Cooperate and given the housing need figures are not yet agreed across all authorities, these could continue to change.

PR-A-091 Bodicote Parish Council

7 This housing should be developed as close to Oxford as possible, using green belt land as necessary and perhaps developing Kidlington, Yarnton and Begbroke. Para. 5.98 states that "Specific, high value employment needs are accommodated at Kidlington and Begbroke", which gives weight to our suggestions. Para. 5.103 & para. 5.104 stress the importance of the "Northern Gateway" site near the Peartree Interchange site. This would also seem relevant to Oxford's needs.

PR-A-091	Bodicote Parish Council		12 Many of the other Cherwell Category 1 villages have been flooded with new housing development and should not be asked to take any housing intended to cover Oxford's needs. Commuting should be actively discouraged. The Planning Inspector commented that there should be a "joint review of the boundaries of the Oxford Green Belt, once the specific level of help required by the city of Oxford to meet its needs . . is fully and accurately defined" (p.26, 4.14). This review is urgently needed and may have been undertaken in the Green Belt Study (4.16); its findings should weigh heavily in the decision regarding Oxford's unmet housing needs.
PR-A-091	Bodicote Parish Council		12 Para. 5.7 points out that "The NPPF notes that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns." This should apply to Oxford (see our comments above).
PR-A-091	Bodicote Parish Council		9 Para. 5.28 refers to distances between specific villages and to the "Kidlington gap". We would point out that none of this has been considered important in the case of Bodicote, where the "Bodicote gap" was conveniently forgotten and Bodicote has been almost joined up with Banbury, with some of its parish land even being taken into Banbury.
PR-A-091	Bodicote Parish Council		9 Para. 5.37 notes the approach of "avoiding sprawl and harm to the identity of settlements including through coalescence". This policy should be applied to the Category 1 villages in the north of Cherwell.
PR-A-091	Bodicote Parish Council		8 Para. 5.81 states that the Local Plan "seeks to reduce the level of out-commuting". This supports our contention that Oxford's housing needs should be met in or close to Oxford and not spread out across the region.
PR-A-091	Bodicote Parish Council		9 It would be better to review the Green Belt for development rather than targeting villages being consumed by towns, e.g. Bodicote/Banbury.
PR-A-092	Fritwell Parish Council	1	The clear message that this Parish Council is hearing from its engagement with the residents is 'No'. There seems to be no evidence upon which to base this figure and until the actual scale of need has been identified (based on up to date, transparent evidence), how can a working figure be arrived at. The current figure seems to have been arrived at by simply splitting the numbers between the five neighbouring local authorities. Nor does there seem to have been any consultation with local communities as to whether this figure is suitable in terms of actual unmet need. More should have been done prior to this consultation to ascertain whether the district has the ability to accommodate this additional growth in a sustainable way.
PR-A-092	Fritwell Parish Council	2	Again, for the reasons set out above in Question 1 this Parish has, at this time, not been made aware of any evidence that justifies additional housing for Oxford City within Cherwell District.
PR-A-092	Fritwell Parish Council	3	This question seems to assume that Cherwell will accept a 'significant' number of houses in response to Oxford City's unmet need. At the moment there seems to be no detailed evidence on which to identify such a need. Indeed, we understand that the final report of the Oxfordshire Growth Board has yet to be published. It would surely be prudent to ascertain what is best for any settlement in Cherwell and their ability to accommodate additional development before assuming numbers. Oxford City must ensure that its identified need is based on current evidence and that an up to date assessment of the capacity within its boundary is undertaken. The question must be asked why should neighbouring authorities (including Cherwell) be the first port of call for Oxford City's unmet needs. Oxford City should endeavour as far as possible to meet their needs and look again at urban regeneration/intensification and the release of appropriate sites located within the green belt. When this assessment of Oxford City's ability to accommodate growth has been completed, then and only then should neighbouring authorities be expected to consider whether they have the ability for extra development. Why should the neighbouring local authorities be expected to meet Oxford City's needs?
PR-A-092	Fritwell Parish Council	5	It seems to this Parish Council that these questions assume acceptance of Cherwell accepting a substantial level of growth to address Oxford City's unmet needs.

PR-A-092	Fritwell Parish Council	6	This Parish Council does not support this consultation or the extent of Oxford City's unmet housing need as to date no need, based on hard evidence, has been established. This would seem to be a hypothetical question! However, once a need has been identified, surely such a need should be met as close to possible to where it is arising.
PR-A-092	Fritwell Parish Council	7	Assuming that evidence becomes available to support Oxford City's unmet housing need, then this Parish feels very strongly that the need should be met as close as possible to Oxford City. This could include land within the green belt although a review should be implemented to ascertain which land would be best suited to meet the need. Consideration should be given to traffic/commuter flows to both Oxford and London.
PR-A-092	Fritwell Parish Council	8	This Parish very strongly objects to a district wide approach. Housing need for the District up until 2031 has been set and meeting this need will require a very challenging rate of delivery. To apply a district wide approach will increase levels which will be beyond support.
PR-A-092	Fritwell Parish Council	9	Definitely yes. As previously said an assessment of green belt land would be particularly appropriate because the green belt has remained unchanged since the 1970s. Although this Parish would not want development at any cost it should not be assumed that neighbouring authorities will accommodate Oxford City's growth. Once a green belt review has been completed it may become apparent that there is potential to provide areas for development.
PR-A-092	Fritwell Parish Council	10	Yes. It is essential that Cherwell District Council ensure that its own housing needs are met in full. If Cherwell District Council does not have a five year land supply because of Oxford City's unmet need it will put all Cherwell's settlements at risk of speculative developers. We do not wish to see the housing land supply put in jeopardy to meet this need; in fact there should be a clear separation of Cherwell's housing needs and Oxford City's unmet needs.
PR-A-092	Fritwell Parish Council	11	This Parish cannot answer this question; however, it is concerned that Oxford City's unmet need for housing does not weaken Cherwell's ability to have a sufficient supply of sites available to meet its five year responsibilities.
PR-A-092	Fritwell Parish Council	12	As already stated the scale of unmet needs still has to be justified; however once this need has been vigorously established then it must be met as near as possible to where it arises. With reference to Category A settlements, it should be recognised that they may not have capacity to accommodate unmet needs from Oxford City. Indeed, Category A villages have made significant contributions to development (750 houses in LP1).
PR-A-092	Fritwell Parish Council	13	No.
PR-A-092	Fritwell Parish Council	14	Fritwell Parish Council cannot provide a response to this question except to say that Cherwell should not be a 'dumping ground' for Oxford City's unmet needs, especially if the City has not considered all reasonable options to meet their own needs.
PR-A-092	Fritwell Parish Council	15	Again, this Parish would say that any need should be accommodated as close to where it arises as possible. The cost of accommodating any unmet need should not undermine the Local Plan Part 1.
PR-A-092	Fritwell Parish Council	16	Feedback from our consultations detailed huge concern regarding traffic volume/rat runs in the parish. Of course, more houses will only add to this.
PR-A-092	Fritwell Parish Council	17	It is critical that improvements necessary to support any growth (although still unproven) are implemented to lessen the potential impact of additional traffic. Although improvements may be possible they should certainly not be at the expense of village life.
PR-A-092	Fritwell Parish Council	18	Fritwell has a very old sewage system; indeed any replacement part has to be individually made meaning that there is very often tankers removing waste from the system. The Parish has had many complaints about the lack of broadband slots; there are worries about cemetery provision and in certain areas of the village the drains overflow on a regular basis.

PR-A-092 Fritwell Parish Council	19	There is the crucial question of whether our existing infrastructure will be made worse if further new homes over and above those already agreed need to be accommodated within Cherwell District.
PR-A-093 Hollins Strategic Land		<p>7 The following extracts demonstrate that Cherwell and Oxford are inextricably linked in some ways:</p> <p>In Cherwell, economic attractors such as London-Oxford airport, Begbroke Science Park, Oxford Spires Business Park and other commercial areas at Langford Lane in Kidlington all have an economic relationship with Oxford as well as Cherwell. (para. 2.22)</p> <p>Bicester also performs as an economically and socially important town within Oxford’s local area of influence and is growing rapidly. (para. 2.22)</p> <p>There are direct rail links from Banbury and Bicester to London, Birmingham and Oxford. The rail link from Bicester to Oxford and beyond is being improved as part of wider east-west rail objectives and a new station at Water Eaton (‘Oxford Parkway’), linking Bicester, Oxford and London Marleybone opened in October 2015 (para. 3.3)</p> <p>The District as a whole has a clear geographic, social, economic and historic relationship with Oxford. (para. 3.4)</p> <p>Bicester is a rapidly expanding historic market town with a long-standing military presence. The town is presently a significant resident commuter base for Oxford. (para. 3.8) (cont...)</p>
PR-A-093 Hollins Strategic Land		<p>7 (cont...) Bicester will grow significantly to 2031 to become an important economic centre in its own right and as part of growth along the Oxford-Cambridge corridor. Bicester will have established itself as a location for higher-technology business, building on its relationship with Oxford. (para. 3.11)</p> <p>It (Kidlington) has a close relationship with Oxford (particularly an economic relationship). (para. 3.20)</p> <p>Bicester is situated about 24km (15 miles) (centre to centre) to the north-east of Oxford accessible via the A34 and the A41 via junction 9 of the M40. From 2016, Bicester will have a direct train service to Oxford. (para. 5.33)</p> <p>Three RT (Rapid Transport) lines have been identified for the city, linking a potential network of new Park & Ride sites including at Langford Lane, Kidlington and to the east of Kidlington off the A34. The County Council’s strategy is to move Park and Ride facilities further away from Oxford to improve operation of the A34 and other road intersects. (para. 5.58) (cont...)</p>
PR-A-093 Hollins Strategic Land		<p>7 (cont...) The proximity of Kidlington, London-Oxford Airport and Begbroke Science Park to Oxford, Bicester’s growing influence and accessibility on the ‘Oxfordshire knowledge-spine’ and the ‘Oxford-Cambridge Arc’, and the international draw of both Oxford and Bicester Village, means that there are a number of shared economic influences. (para. 5.102)</p> <p>Immediately adjoining Cherwell, is a 44 hectare site off Peartree Interchange, the ‘Northern Gateway. Site, allocated by Oxford City for mixed use development. The site adjoins Cherwell District. (para. 5.103)</p> <p>The graphic provided on page 47 of the LPP1PR demonstrates that Oxford is the top workplace for outbound commuters from Cherwell: (image provided in rep) (cont...)</p>
PR-A-093 Hollins Strategic Land		<p>7 (cont...) Oxford City Council Core Strategy: The Core Strategy (CS) Key Diagram highlights the inextricable link between Cherwell and Oxford. Three of the key access points into Oxford from the surrounding area are all from within Cherwell. Furthermore, it shows the good rail links between Cherwell and Oxford. There is also a Park and Ride facility within Cherwell and another adjacent to the Cherwell boundary. (cont...)</p>

PR-A-093 Hollins Strategic Land		<p>7 (cont...) Local Transport Plan 2015 – 2031 Figure 7 of this document demonstrates that there are significant travel to work flows between Cherwell and Oxford. (figure provided in rep)</p> <p>Figure 9 further emphasis the economic relationship between Cherwell and Oxford, in comparison with other authorities. (graph provided in rep).</p> <p>Figure 22 shows the significant extent of the public transport links between Cherwell and Oxford: (figure provided in rep) (cont...)</p>
PR-A-093 Hollins Strategic Land	1	<p>It is evident that Cherwell has a clear geographic, social, economic and historic relationship with Oxford. Furthermore, the Cherwell, Oxford and Oxfordshire documents referred to suggest that other authorities do not have the same relationship with Oxford.</p> <p>As a result of this, it is considered that Cherwell must not underestimate its relationship with Oxford at this stage of the LPP1 Partial Review process and should increase its working figure beyond 3,500.</p>
PR-A-094 Persimmon Homes Midlands	1	<p>The advanced sustainability appraisal will help to give more of a steer on the housing numbers that Cherwell District should look to plan for through the review of the Local Plan Part 1. Once this has been undertaken, a greater critical analysis of the unmet housing needs delegated to the other Oxfordshire local authorities can take place.</p> <p>Persimmon Homes Midlands assume that the district of Cherwell should look to take greater numbers due to it having two of the largest towns in Oxfordshire, Bicester and Banbury, as well as one of the largest villages in the UK, Kidlington.</p> <p>Mass development is currently ongoing in both Bicester and Banbury, so any unmet needs that are allocated to the towns will be very much long-term schemes.</p> <p>The rural nature of Oxfordshire will not help the county in meeting the unmet needs of Oxford, as sustainability becomes an issue with regards to the goals of the NPPF. In the whole, the majority Oxfordshire will not be able to contribute to the achievement of sustainable development in any substantial manner, due to the size of its urban locations outside of the main urban agglomeration that is Oxford. As this is the case, it would be sensible for the housing numbers to be pushed towards the main urban locations within Oxfordshire that are relatively unconstrained, Bicester and Banbury.</p>
PR-A-094 Persimmon Homes Midlands	2	<p>The adopted Cherwell Local Plan identifies a large mass of land dedicated to employment uses. These are based in the main towns of Banbury and Bicester, as well as the large village of Kidlington. As Kidlington is closely related to Oxford out of the three settlements, further employment allocations can be twinned with residential development in order to promote sustainability and a thriving economy.</p> <p>An idea for additional employment opportunities would be to locate them in the larger villages of Cherwell, alongside extra sites in Bicester and Banbury, creating small to medium sized business parks that can accommodate a range of business uses, which would lead to an enhanced economy in the surrounding geographical area, and a greater variety of office opportunities for companies who cannot afford to pay the high rental rates that are present in the City of Oxford.</p> <p>If some of the unmet needs are issued to the town of Banbury, there is a chance the locality can tap into the links with South Northamptonshire and the motor/high-tech industries that are present there. Once again, it offers the opportunity for smaller businesses to afford the rates rather than struggle to pay those apparent in the City of Oxford.</p>

PR-A-094 Persimmon Homes Midlands	3	<p>The main issue that Cherwell should look to address when it makes a significant contribution to meet Oxford's unmet housing needs is affordability. Oxford is plagued by the tag of being the most unaffordable place to live in the UK, with average property prices being sixteen times the average earnings of people who live within the city. This is not sustainable, with workers not being able to live in Oxford. Due to Cherwell being located close to the city of Oxford, the cost of living is still particularly high, particularly in Bicester and the village of Kidlington. If new development is to be pursued in these locations, the affordability of the schemes should be a key feature. The recent consultation of the proposed changes to national planning policy noted a potential amendment to the existing NPPF definition of affordable homes, enabling the provision of Starter Homes as a form of affordable dwelling. This is supported by Persimmon Homes as it will allow for a variety of people to access the housing market in an affordable manner. Delivering a proportion of starter homes on reasonably-sized housing sites within Cherwell should enable it to successfully deliver a range of housing opportunities for home ownership. Another key issue when considering the contribution Cherwell will make in meeting Oxford's unmet housing needs is the previously mentioned physical constraints and planning designations that are seen throughout Oxfordshire. This will vastly hamper supplying the future houses to meet Oxford's needs, but this is a UK wide problem rather than one that has solely occurred within Oxfordshire. The rural nature of all the local authorities within the county is a contributing factor to the designations, so mitigation measures need to be built alongside development in order for development not to detrimentally affect the designated areas. However, these constraints and designations should help the geographical distribution of Oxford's unmet housing numbers as the sustainable settlements within the county can be clearly identified.</p>
PR-A-094 Persimmon Homes Midlands	4	<p>Additional growth in the district should look to benefit itself as much as possible. Retaining a skilled labour force within the District should be a principle that should be adopted in order for Cherwell to reap the economic benefits of the relationship with Oxford. Also, a key principle in order for the cross-boundary work to be a success is co-operation between the Oxfordshire local authorities. Communication has to be common between the authorities to achieve the goals set out in the plan reviews that are undertaken, planning for the unmet needs of Oxford. The twinning of housing and infrastructure should be a priority for Cherwell as this will help implement the extra housing that will be allocated within the district.</p>
PR-A-094 Persimmon Homes Midlands	5	<p>The focused Vision for meeting Oxford's unmet housing needs should look to build upon the original vision of the adopted Cherwell Local Plan, using the same principles, as they apply to this situation. Economic, environmental and social sustainability should look to be strengthened through further additions to the built environment in the most sustainable locations.</p> <p>Oxford's international ties and recognition should be a key focus of the vision, pointing to how Cherwell contributes to this and the benefit the district could give to Oxford City in the future. Extending sustainable places as well as focusing residential and employment development around transport hubs should be the way forward for Cherwell accommodating Oxford's unmet needs.</p>
PR-A-094 Persimmon Homes Midlands	6	<p>Sustainability wise, it is obvious the plan area for the Partial Review document should be well related to the city of Oxford, as being close to the place you work or use as a service centre is particularly desirable, as well as more environmentally friendly. Persimmon Homes believes that the majority of development planned for should be located fairly close to Oxford. This means Kidlington and Bicester should look to plan for additional residential units, as they are also places that hold services, facilities, transport links and employment opportunities.</p> <p>Geographically, Bicester and Kidlington are located within a desirable commuting belt to Oxford, and this is where the majority of the unmet housing needs of the city should be located, however, the area of search should not rule out the potential release of some Green Belt land. The release of Green Belt land, in particular brownfield sites around Kidlington, could help the situation the city finds itself in significantly as it lies adjacent to it, leading to a sustainable location for development to take place.</p>

PR-A-094	Persimmon Homes Midlands	7	<p>As already mentioned, the underlying message of the NPPF is for development to be sustainable in all aspects. Thus, the factors that should influence the plan area are all to do with how sustainable a place is, and how it should take an amount of development relative to its size. Connectivity and transport links are a great advantage to a settlement, with the recent government consultation on changes to the NPPF looking towards higher densities around commuter hubs, thus the district council should look to locate some future development in these areas. Areas around the Oxford Parkway station that links the area to London have the potential to hold a large amount of housing numbers.</p> <p>Another factor that should influence the plan area is the facilities and services that exist in a settlement already. Once again, this all links back to sustainability, with a settlement that has got a range of facilities and services the preferred option for a decent sized development. The council should also factor in what developments can provide for a village in terms of services and facilities, so smaller settlements that do not that have a great range of services and facilities should also be assessed for their potential to grow in a sustainable way.</p>
PR-A-094	Persimmon Homes Midlands	8	<p>The sustainability appraisal will further dictate if a district-wide area is appropriate for accommodating the unmet needs of Oxford. Persimmon Homes believe that the north of the district should still be investigated as a potential area to hold some of the housing needs of Oxford as the settlement of Banbury is one of the most sustainable locations within Oxfordshire, with its very good transport links, amount of facilities and services that can already be easily accessed.</p> <p>It would be unreasonable to totally disregard the northern part of the district, in particular Banbury, as a place that should not take any of Oxford's unmet housing needs.</p>
PR-A-094	Persimmon Homes Midlands	9	<p>Persimmon Homes believe that continued work should be undertaken by the Oxfordshire Growth Board to determine the potential release of some of the designated Green Belt land for residential development associated with Oxford. Low value areas that do not contribute to the aims of the Green Belt and are related fairly well to an existing settlement should look to released for future development.</p> <p>Oxford city cannot accommodate the amount of houses they need to supply in order to nullify the need, so the release of a sustainable part of the Green Belt would release the pressure on Oxford once potential schemes are built out.</p>
PR-A-094	Persimmon Homes Midlands	10	<p>An individual five year housing supply of deliverable sites for meeting Oxford's needs could be a very useful way of monitoring the delivery of the extra numbers allocated to the other Oxfordshire local authorities. However, a separate entity for these unmet needs could be particularly hard to implement and separate from the original housing land supply numbers that are presently used. Strict regulations would need to be placed upon the unmet needs five year housing land supply calculation to avoid potential double counting.</p> <p>Furthermore, more details need to be given with regards to whether sites would be allocated for the Oxford overspill and whether infrastructure costs would be associated with the city council or the district. The council would also need to be clear on the strategy for growth between years 6-11.</p>
PR-A-094	Persimmon Homes Midlands	11	<p>To ensure that Cherwell manage a five year supply for Oxford without conflicting with the existing local strategy and its housing requirements, sites would need to be identified as separate to those already allocated or included within the five year housing land supply count. Maps would need to be clearly marked with the particular allocations that are coming from Oxford's unmet needs.</p>

PR-A-094	Persimmon Homes Midlands	12	<p>Affordability within Oxfordshire, in particular Oxford, is a great issue that all the authorities face. The introduction of starter homes throughout the whole of Oxfordshire should help a greater amount of people access homes for ownership, allowing for a more sustainable economy to be enacted in the county. Cherwell District should look to pursue Starter Homes alongside the other traditional forms of affordable housing to make sure future properties are affordable to a range of people. At present, the unaffordable nature of Oxford is acting as a barrier to the retaining and recruiting of workers.</p> <p>Persimmon Homes believe that strong actions should be taken to solve the shortage of homes within Oxford. The district council, as well as all the other Oxfordshire authorities may need to take controversial steps, going against some existing planning principles, in order to sufficiently deliver the unmet needs of Oxford.</p>
PR-A-094	Persimmon Homes Midlands	13	<p>Oxford's relationship with London should be looked at when considering the amount of housing that will be needed in the future and where in Oxfordshire it will be accommodated. The continued pressure for housing supply in and around London's commuter belt local authorities cannot be ignored, as numbers will not be consumed within the Green Belt, and therefore they will be aimed at those local authorities on its periphery. Cherwell District is an example authority of where those local authorities that are mostly situated outside the Green Belt play a key role in ensuring there is enough housing being provided in the South East to accommodate demand and help ease the regional affordability problem. An increase in out-migration from London is already very likely as a result of the London Plan 2011-2021 failing to supply enough housing to meet the identified need.</p>
PR-A-094	Persimmon Homes Midlands	14	<p>Persimmon Homes Midlands believe a range of housing objectives should be considered for meeting Oxford's unmet needs within Cherwell. These are:</p> <ul style="list-style-type: none"> - Affordability will be key in allowing a range of people to access the housing ownership market. The use of starter homes alongside traditional forms of affordable housing should help to alleviate the problem of affordability within the city of Oxford and other parts of Oxfordshire. - High density developments in sustainable locations will mean land is efficiently used and schemes are more desirable for developers. - A wide range of market housing should be encouraged in order to accommodate the needs of different points in the housing market. <p>Large detached houses are not wanted by the majority, and the space they take up is inefficient.</p> <ul style="list-style-type: none"> - Housing developments should look to make a place more sustainable, through the provision of funds for new services and facilities, as well the improvement to existing ones.
PR-A-094	Persimmon Homes Midlands	15	<p>The majority of the strategic housing sites to meet Oxford's unmet needs should be located in the town of Bicester and the village of Kidlington. These settlements are related well to Oxford and also have direct transport links to the city. As well as this they hold a range of employment opportunities, facilities and services. Kidlington is surrounded by the Green Belt, but its relationship with Oxford can be seen as an opportunity for development location, thus low value areas of the Green Belt around Kidlington should be released for some strategic housing development.</p> <p>Banbury, to the north of the district, should not be ruled for taking strategic housing sites. The town is sustainable, demonstrated by the features mentioned in association with Bicester and Kidlington. It is essential larger villages within Cherwell also contribute to the unmet needs of Oxford, therefore they will not stagnate in size and become places of no development. Housing developments can contribute to the upgrade of a facility or even provide on-site facilities to contribute to the local community.</p>

PR-A-094	Persimmon Homes Midlands	16	<p>As suggested previously, transport infrastructure should be twinned with future residential development in order to enhance the sustainability of the development's location. Already suggested is the focus on Bicester and Kidlington, thus meaning transport links need to be managed effectively to enhance the areas of development.</p> <p>The A34 is the main route from Oxford to Bicester, and if Bicester is to expand even further the capacity of the A34 needs to be greatly improved. This is mentioned within the Local Transport Plan covering the period 2015-2031, which is a good sign that a greater capacity of traffic will be accommodated to run along side the potential expansion to Bicester.</p> <p>If Kidlington is to take some of the unmet housing needs of Oxford then transport improvements should be made to a great extent. Many employment opportunities are to be had within the village, with future opportunities planned, Oxford Parkway Station needs to be taken advantage of with transport links made fluent and effective to this commuter hub.</p>
PR-A-094	Persimmon Homes Midlands	17	<p>For high levels of future development to take place transport infrastructure funding needs to be implemented with the help of the government. This funding needs to be a long-term commitment to enable the effective delivery of potential development. Also, further to looking at focusing residential development at high densities around commuter hubs, infrastructure funding needs to be targeted as these hubs and the surrounding locality. However, too much reliance should not be placed upon the delivery of these commuter hubs as a lack of housing type variety could become common in the market, as high density schemes become the main type of development. A range of tenure needs to be delivered to hit different price points in the market.</p> <p>As suggested, the A34 needs to be greatly improved, and with potential improvements noted within the Local Transport Plan 2015-2031, it looks like further capacity will be made available along this road. The road connects Bicester and Oxford, and if much of the housing development is to take place in Bicester, then continued support and funding should be a priority for the A34.</p>
PR-A-094	Persimmon Homes Midlands	18	<p>Implementing infrastructure is a costly exercise, affecting the viability of developing a housing scheme, thus an infrastructure delivery vehicle needs to be put in place to facilitate and streamline development within the district, particularly near to the city of Oxford. A common problem with infrastructure is the time it takes to deliver, and the period it delays the commencement of building and selling residential units. If an infrastructure delivery vehicle is comprehensively planned for, then the unmet needs of Oxford should look to be delivered in an efficient amount of time.</p> <p>It was noted that no CIL Regulation 123 list has been provided to see where the CIL payments from future developments will be spent. As it is still being formulated it is important for the District Council to use this opportunity to include future projects that could be affected by the Local Plan Part 1 review. It may be sensible to delay the setting of CIL rates within the district until after the unmet needs of Oxford have been allocated to the Oxfordshire local authorities to enable for a more accurate CIL Regulation 123 list to be produced. If extra housing development will be pushed to Bicester then the list should specify where the CIL payments from future developments will be spent to help deliver extra development within the town.</p>
PR-A-094	Persimmon Homes Midlands	19	<p>If an infrastructure delivery vehicle or infrastructure funding is put in place to deliver future development then schemes will be delivered much quicker and more efficiently. Also, if CIL focuses upon a particular infrastructure need in one of the potential development locations then the viability of a scheme should be positive, enabling for an effective delivery of the housing needs.</p>

PR-A-094	Persimmon Homes Midlands	22	<p>It is important for the District to acknowledge residential, employment and relevant infrastructure need to be delivered together in order to increase sustainability within a settlement.</p> <p>Transport infrastructure to support new residential and employment development is essential, as the implementation of structures that allow for less travel to work time and sustainable transport methods would lead to a more productive and environmentally friendly locality. The council should explore eco-friendly transport methods that can access future employment and residential areas, whilst also promoting these public services. If the accessibility level of public services increases as well as the increase in frequency of the services then this will encourage people to use public transport, creating more sustainable places.</p>
PR-A-094	Persimmon Homes Midlands	23	<p>Though scheme sustainability is an essential part of the underlying message of the NPPF, the district council should not put policy in place that is restrictive and looks at unnecessary levels of sustainable measures to be adhered to on a development site. This can detrimentally affect the viability of a scheme, leading to the knock on effect of long delays in development, as well as the non-delivery of housing numbers within Cherwell. Thus, the unmet housing needs issue of Oxford city will be exacerbated.</p>
PR-A-094	Persimmon Homes Midlands	20+21	<p>Persimmon Homes believe the council should use the association and relationship with the city of Oxford to help grow the economy from within the district. By creating attractive places that have access to a range of facilities and services, as well as employment opportunities the retention of skilled labour and the attracting of new skilled labour should become an easier task. If this happens then the economy of Cherwell will grow.</p> <p>This process can be accelerated through a greater provision of employment within the district. Though employment land in the adopted Local Plan Part 1 was particularly positive, even greater opportunities should be pushed for. This would allow for a range of companies to base themselves within Cherwell, potentially attracting Oxford habitants, leading to a benefit from the associated growth of Oxford as money is put back into the district's economy. A potential release of land from the Green Belt could allow this to happen, especially around Kidlington where the Oxford Parkway station could be used as a focal point for development.</p>
PR-A-094	Persimmon Homes Midlands	24-27	<p>No comment.</p>
PR-A-095	L Ward	1	<p>No. It is derived from the Oxfordshire SHMA which has never been subject to independent review. Its figures for housing need are wholly unrealistic and vastly exceed previous trends and likely future outcomes. The SHMA figures for Oxford's needs are highly contentious and have not been subject to consultation via any Oxford plan or endorsed by public examination. They do not provide a valid basis to review Cherwell's Local Plan and add additional housing of this magnitude. Therefore the 2014 SHMA should be subject to independent critical review free of the outrageous bias toward the development industry and the LEP. Until and unless this is done, the grossly excessive figure of 22,700 houses that you have committed to supply via Cherwell's adopted Local Plan, should be amply to meet any Oxford City overspill. I think this is a critical point for Cherwell to succeed in meeting its housing targets and demonstrate that there is demand. There must be a significant level of 'dual counting' across the county and indeed the UK that is artificially inflating housing requirement projections. You should focus on achieving the already daunting targets and persuading developers to build on the current strategic sites in a timely and coordinated fashion.</p>

- PR-A-095 L Ward 2 No. The entire premise of this consultation is to address Oxford's hypothetical overspill needs. So anyone housed as a result should of necessity be commuting into Oxford or its immediate environs for employment. The question is entirely illogical and the consultation is flawed by its inclusion. Better to have stated unequivocally that employment generating development would be specifically excluded from any resulting proposals/ The new employment developments proposed at Langford Lane, Kidlington, at Begbroke Science Park and just over the District boundary at the so-called Northern Gateway is already excessive. Again, let these be delivered and the level of demand for additional employment demonstrated. There is currently significant vacant development land and premises at the Oxford Science Park to the south of the city and in the adjacent Kidlington business park. I have seen papers that suggest Oxford City is proposing to create science parks and the like within the City boundary which are speculative in nature.
- PR-A-095 L Ward 3 Oxford City should scale its housing provision to the available City area. It should encourage and support the development of county towns such as Bicester and Banbury and move away from its current expansionist policies. The N Gateway is misguided. Oxford's transport and commuting issues are in my view insurmountable. The geographical constraints should be accepted.
- PR-A-095 L Ward 4 I see no requirement to expand the existing vision to accommodate extra growth for Oxford City's hypothetical unmet housing needs. I believe that accepting an additional housing burden on top of that we have already taken would be incompatible with *"By 2031, Cherwell District will be an area where all residents enjoy a good quality of life. It will be more prosperous than it is today. Those who live and work here will be happier, healthier and feel safer"*. If you proceed as planned then quality of life will be difficult to sustain. Commuting, lack of adequate infrastructure & degradation of our precious rural setting will be devastating. In terms of key principles may we please see: 1) planning based on sound evidence. The 2014 SHMA is not fit for purpose and should be discarded. 2) Localism, a willingness to listen and support community needs and views. I could live in Oxford if I chose. I live and vote in Cherwell. 3) Greater transparency and accountability of unelected bodies setting policy such as the Growth Board and LEP 4) High housing unit density and affordability 5) Housing provision that meets actual requirements ie for flats, one two and 3 bed accommodation that is in short supply but high demand not the 46 bed palaces being built for investment and profiteering purposes.
- PR-A-095 L Ward 5 That any additional growth for meeting Oxford's unmet will be targeted to meet Oxford's genuine unmet need ie be 'worker focused'. We have no information what these might be. I would expect that growth is largely based on key worker accommodation and university / scientific staff with limited house purchasing or indeed rental affording capacity who would need ease of commute. In that respect, any homes we take should be required to be 100% genuinely affordable for people on the average key worker or lecturer salary.
- PR-A-095 L Ward 7 Is there really any area of search within Cherwell that was not considered and dismissed as part of the Local Plan part 1 – given the council was forced to amend its original proposal to accommodate the 2014 SHMA? I do not see that anything has changed. An additional 3,500 homes to meet the needs of Oxford will presumably result in at minimum an additional 3,500 commutes into and out of Oxford. This in addition to any of Cherwell's own housing expansion some of which will increase Oxford's dormitory capacity and inbound commutes. So sustainability of transport is vital.

PR-A-095	L Ward	9	<p>No. Here I quote from Kidlington Development Watch submission which I endorse and helped author. Planning guidance states that permanence is a key characteristic of the Green Belt. It also makes clear that housing and economic needs do not override constraints on the use of land, such as Green Belt. It acknowledges that this may mean that an authority is in fact unable to meet its objectively assessed needs. Cherwell appears to have made no attempt to take into account the affect of the Green Belt (and other constraints) on its ability to provide for objectively assessed need. (And, as we have pointed out above the figure it is using for "objectively assessed need" is no such thing and is highly exaggerated). The Review of the Local Plan provides an opportunity to put right these deficiencies. Green Belt is much valued by local residents, makes an important contribution to the areas natural capital, and should be improved as an asset in its own right and not built upon.</p> <p>The Government, in its manifesto, made a strong commitment to protect the Green Belt. Paragraph B253 of the Cherwell Local Plan says "The Oxford Green Belt was designated to retrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area." We support this statement strongly. Planning policy should therefore seek to direct development away from the city, both within and beyond the county boundaries.</p>
PR-A-096	Nathaniel Lichfield & Partners / Church Commissioners for England	1	<p>Cherwell must increase this number if they are able to provide the need for new housing in Oxford that cannot be met within its present boundaries.</p> <p>The Strategic Housing Market Assessment (SHMA) (March 2014) identified that in the period 2011-2031 up to 93,560 - 106,560 (4,678 - 5,328 homes per annum) additional homes are needed across Oxfordshire. Of this total, 24,000-32,000 are needed in Oxford.</p> <p>The Oxford Strategic Housing Land Availability Assessment (SHLAA) (December 2014) found that there is only enough land available in the city to accommodate between 32% and 43% of this need - around 10,200 new homes - leaving a shortfall of up to 21,800 further homes that are needed up to 2031.</p> <p>Cherwell is required by the Government National Planning Policy Framework (NPPF) (March 2012), via the statutory 'duty to cooperate' and para.B.95 of the Cherwell Local Plan Part 1 (July 2015), to assist Oxford in meeting this need.</p>
PR-A-096	Nathaniel Lichfield & Partners / Church Commissioners for England	6	<p>Yes, CCE agree that any 'area of search' for the Partial Review document should be well related to Oxford City. The relationship should be geographical, particularly taking account of connectivity and accessibility to the city centre.</p> <p>In particular, any area of search should focus on existing village settlements, such as Islip, sitated along the high speed Oxford Parkway to London Marlebone (via Bicester Village) railway line which has recently been upgraded for 160km/h operation.</p> <p>This is an important and strategic connection between the two major cities and villages with stations on this line should be considered to accommodate growth. As such, housing development at Islip would be sustainable and accord with NPPF policy guidance.</p>

PR-A-096	Nathaniel Lichfield & Partners / Church Commissioners for England	7	<p>CCE consider that factors that might help define any 'area of search' should include distance /proximity to Oxford (Islip is 5 miles north) and key transport corridors with transport infrastructure linkages to Oxford City.</p> <p>In addition to the areas highlighted above, another area which should also be included within any 'area of search' is the Oxford Green Belt, particularly the area of Green Belt situated north of Oxford given its proximity to Bicester and London. The Oxfords hire Growth Board recognises that it is necessary for a strategic review of the Oxford Green Belt boundaries in order to consider potential locations for growth.</p> <p>In particular, Green Belt land that matches the selection criteria set out by para. 85 of the NPPF (2012) e.g. Green Belt land that meets the requirements for sustainable development and is well contained in the landscape (i.e. has definable physical boundaries) and that is not within the floodplain should be released and utilised. (cont...)</p>
PR-A-096	Nathaniel Lichfield & Partners / Church Commissioners for England	7	<p>(cont...) National Policy supports the alteration of green belt boundaries "in exceptional circumstances, through the preparation or review of the Local Plan ... [and states that] ... at that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term" (NPPF, 2012: para. 83). When drawing up or reviewing Green Belt boundaries "local planning authorities should take account of the need to promote sustainable patterns of development"(NPPF, 2012: para. 84).</p> <p>Islip is in a highly sustainable location. This is exemplified by the high score that it achieves in Cherwell's Village Categorisation Update (2014)- meeting seven of the eight criteria: nursesey, primary school, retail service, food shop, public house, recreational facilities, village and community hall (see Table 1 below) (Village Survey Result for Islip provided in rep). (cont...)</p>
PR-A-096	Nathaniel Lichfield & Partners / Church Commissioners for England	7	<p>(cont...) The village is, therefore, identified as a sustainable settlement. It has only been ruled out to date because of its location within the Green Belt, as stated in paragraph 23 of the Village Category Update :</p> <p>"While the village of Islip would 'score' sufficiently highly to be included as a category A village, it could not be categorised as such due to it being completely within (i.e. 'washed-over' by) the Green Belt".</p> <p>It is, therefore evident that, while it is recognised that Islip is a sustainable settlement which has adequate services to support growth, it has not be considered as an option to meet housing requirements because of its location in the Green Belt.</p> <p>Any area of search must release sustainable sites, like Islip, which do not meet all the five Green Belt purposes outlined at para. 80 of the NPPF from the Green Belt.</p>
PR-A-096	Nathaniel Lichfield & Partners / Church Commissioners for England	9	<p>CCE consider that an area based on the Oxford Green Belt should be included. The NPPF supports the alteration of Green Belt boundaries through the preparation or review of the Local Plan (NPPF, 2012: para. 83).</p> <p>In particular, the NPPF stresses that when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of "the need to promote sustainable patterns of development"(NPPF, 2012: para. 84).</p> <p>It also states that in relation to rural areas, housing "should be located where it will enhance or maintain the vitality of rural communities" (NPPF, 2012: para. 55). Growth at Islip will in turn help maintain the sustainability of the settlement, helping support local community facilities and ensuring local businesses remain sustainable.</p> <p>In line with the national policy presumption, CCE consider that sustainable villages within Cherwell, which are currently within the Green Belt, should be included for their ability to accommodate the required growth.</p>

PR-A-096	Nathaniel Lichfield & Partners / Church Commissioners for England	15	<p>Cherwell should focus on the most sustainable villages which have existing services and facilities and public transport links to support growth.</p> <p>As outlined above, Islip has sufficient services and facilities to accommodate additional residential development. In addition, the village is highly accessible being situated on the high speed railway line and offering regular bus services to Oxford and Bicester, operated by Thames Travel and Charlton Services.</p> <p>In addition, sites which are located on the edge of settlements and that are accessible and have no major constraints, for example in terms of flooding, should be considered as these can assist in supporting facilities and communities.</p>
PR-A-096	Nathaniel Lichfield & Partners / Church Commissioners for England	28	<p>Site submissions - Land off Bletchingdon Road and Kidlington Road; and Land off Mile Lane/Kidlington Road north of the railway line.</p>
PR-A-097	Barton Willmore / A2Dominion	1	<p>Paragraph 47 of the National Planning Policy Framework (NPPF) requires Local Plans to meet the full, objectively assessed needs for market and affordable housing in the housing market area. The Oxfordshire Housing Market Area comprises Oxford City Council, Cherwell District Council, South Oxfordshire District Council, Vale of White Horse and West Oxfordshire District Council.</p> <p>Oxford City Council's 'Oxford Growth Strategy' paper, published 10 September 2015, sets out the findings of the Oxfordshire wide Strategic Housing Market Assessment ('SHMA') (April 2014). Of the objectively assessed need (OAN), 24,000 - 32,000 homes were identified as needed to meet the needs of Oxford. However a recently prepared Strategic Housing Land Availability Assessment ('SHLAA') indicates that there is only capacity in Oxford to sustainably provide around 10,000 further homes within the City's boundaries, thereby demonstrating that some 14,000 - 22,000 new homes for Oxford will need to be provided within neighbouring local authority areas.</p>
PR-A-097	Barton Willmore / A2Dominion	1	<p>(cont...) In response to the SHMA, the Oxfordshire Growth Board commissioned a series of studies to arrive at a sustainable distribution of housing in the neighbouring local authority areas to address the unmet Oxford housing need (Post-SHMA Process). Technical work is being undertaken to inform an agreed Oxford unmet need figure; including a joint Green Belt study/review, a County-wide 'Assessment of Spatial Options' against sustainability criteria, and an Infrastructure Study to inform and then test the deliverability of the preferred spatial strategy. To date, only the Green Belt Study has been finalised.</p> <p>The first key project within the Programme was to agree the figure for unmet need in Oxford City. All authorities agreed a working assumption of 15,000 homes for Oxford City's unmet need. This figure has yet to be tested and may not therefore be the correct level.</p> <p>Officers now estimate that the Programme will ask the Growth Board to approve a Memorandum of Understanding containing the agreed apportionment of the unmet need for Oxford between the rural districts in August/September 2016. (Paragraph 19, Oxfordshire Growth Board Committee Paper, 2nd February 2016). This will be informed by the emerging evidence base. We query the forum for testing this number. (cont...)</p>
PR-A-097	Barton Willmore / A2Dominion	1	<p>(cont...) Cherwell's Partial Review Paper assumes the unmet need (15,000 new homes) will be distributed evenly between authorities within Oxfordshire. Taking into consideration variables, the Partial Review Paper currently identifies the need for Cherwell District Council (CDC) to deliver 3,500 homes.</p> <p>We consider the figure 3,500 to be premature and query the evidence base behind this. This assumption is made prior to issue of the Memorandum of Understanding containing the agreed apportionment of the unmet need for Oxford between districts and issue of the full evidence base being prepared by the Oxfordshire Growth Board.</p> <p>It is not simply a case of evenly distributing need across authorities. It is a question of capacity and contribution to strategic priorities and spatial strategy.</p>

PR-A-097 Barton Willmore / A2Dominion	1	<p>(cont...) West Oxfordshire's emerging Local Plan has recently been through Examination. The Inspector's Preliminary Findings (dated December 2015) queried the set housing target (10,500 dwellings over the plan period) which falls short of the OAN set out in the Oxfordshire SHMA (13,200 dwellings over the plan period) (paragraph 1.2 of the Inspector's Preliminary Findings – Part 1). Furthermore, the West Oxfordshire emerging Local Plan makes several strategic allocations, but does not allocate all the land necessary to deliver the housing requirement over the plan period (note this is based on 10,500 dwellings only) nor does the emerging Local Plan take into consideration Oxford's unmet need. In response to the Council's request, the Inspector has suspended the Examination to allow further work on housing targets, including the need to address Oxford's unmet need, and housing land supply.</p> <p>The Vale of White Horse (VoWH) District Council submitted its Local Plan to the Secretary of State in March 2015. The Examination has now taken place. The VoWH has committed to meeting its full OAN (as set out in the SHMA) over the plan period (20,560 dwellings). A five year supply of deliverable housing land can be identified against the plan's stated housing requirement. The emerging Local Plan identifies a number of strategic allocations of varying scale for new housing development, which are intended to deliver 13,960 of the total 20,560 dwelling requirement for the VoWH across the Plan period (2011 - 2031). The Council has proposed to deal with Oxford's unmet need through a Local Plan review once adopted. The effect is for this District to set spatial strategy with no reference to wider Oxfordshire's needs. The Council is awaiting the Inspector's Report. (cont...)</p>
PR-A-097 Barton Willmore / A2Dominion	1	<p>(cont...) South Oxfordshire's Local Plan 2031 incorporates a review of its adopted Core Strategy. The Local Plan review was published for Refined Options consultation in February 2015. Adoption is anticipated in 2018. In the Refined Options, South Oxfordshire sets a target of 3,600 new homes within the plan period (when taking into consideration permissions, allocations and other commitments). However, this target would result in a shortfall of affordable dwellings. The housing target must be increased (even without Oxford City's unmet need). The Refined Options identifies a further target of 3,000 to meet Oxford City Council's unmet need. The evidence base for these figures is unclear. South Oxfordshire states:</p> <p>"Until the joint work with other Oxfordshire authorities is complete we do not know what the scale of any unmet need will be' " (Refined Options page 42)</p> <p>In terms of housing delivery, the Oxfordshire SHMA assesses housing need from 2011, and as a result the South Oxfordshire Council is already four-years behind in its housing delivery. In addition to this, there has already been delayed housing provision within Didcot. This lack of delivery is therefore putting additional pressure on housing delivery within the district as well as on the district's five year housing land supply. (cont...)</p>
PR-A-097 Barton Willmore / A2Dominion	1	<p>(cont...) The distribution of need across Oxfordshire has yet to be determined. Only South Oxfordshire has proposed a figure to meet Oxford's unmet housing supply in its Refined Options consultation paper. However, it is unclear what evidence base this is based on. All other authorities are awaiting the Oxfordshire Growth Board evidence base. Opportunities and constraints of each local authority will inform how the unmet need is distributed across the County.</p> <p>There is insufficient evidence to conclude that the level of unmet need from Oxford City to be provided for within Cherwell District Council should be limited to around 3,500 dwellings.</p>

PR-A-097 Barton Willmore / A2Dominion	2	<p>The NPPF sets a presumption in favour of sustainable developments. Paragraph 17 states:</p> <p>“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth” and “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”.</p> <p>Links to existing employment development and new employment generating development opportunities should be considered alongside additional homes. New homes should be provided where existing services and employment opportunities exist or can be enhanced to reinforce a sustainable pattern of development in accordance with the defined spatial strategy. (cont...)</p>
PR-A-097 Barton Willmore / A2Dominion	2	<p>(cont...) In considering housing sites to accommodate Oxford’s unmet need, careful thought must be given to economic links with Oxford City and existing centres. Consideration should be given to economic links within Cherwell and suitable locations to deliver new homes and employment opportunities.</p> <p>Bicester is a strategic location with good connectivity, and falls within two business clusters – the UK motorsport cluster, and Oxfordshire high tech cluster. Bicester has significant areas of land allocated for both housing and employment in the adopted Local Plan. Demand will ensure that the housing land will be built out. The local authority and the OLEPs will need to do whatever they can to ensure jobs growth in Bicester matches housing growth.</p>
PR-A-097 Barton Willmore / A2Dominion	3	<p>Oxford’s unmet housing need must be delivered in a way which promotes sustainable forms of development in accordance with the NPPF (Paragraph 7), utilises existing infrastructure, services and facilities of Oxford City and Cherwell District, and compliments the existing built form and landscape within the area.</p> <p>Paragraph 1.3.2 of the Oxford Core Strategy (March 2011) identifies the issues and challenges faced by Oxford City.</p> <p>Moving forward, consideration must be given to a wide range of matters, so as to establish the quantum, most suitable location and form of development required to meet Oxford’s needs. Cherwell must consider:</p> <ul style="list-style-type: none"> - Oxford City Council’s adopted vision; - Development patterns with Oxford City Council, including strategic growth locations and how these relate to Cherwell; - Employment provisions/ hubs within Oxford City Council; - Objectively assessed employment needs/ opportunities of Oxford City Council and how these relate to Cherwell District; (cont...)
PR-A-097 Barton Willmore / A2Dominion	3	<p>(cont...) - Transport connections with Oxford City Council which can be utilised;</p> <ul style="list-style-type: none"> - Local services, social and community infrastructure (such as education) and any shortfalls/ future needs/ opportunities; - Constraints such as Green Belt and areas at risk of flooding; - Objectively assessed housing need, including likely mix and affordability (Oxfordshire SHMA); - Social and historic connections.

PR-A-097	Barton Willmore / A2Dominion	4	<p>When establishing key principles and goals that the additional growth in the District should be achieving, consideration should be given to the NPPF, National Planning Practice Guidance, Oxford Core Strategy and Cherwell Local Plan Part 1.</p> <p>It is important to note that the delivery of housing to meet Oxford's unmet housing need cannot be considered in isolation. The principles and goals should reflect the wider goals and objectives as already defined in the Oxford Core Strategy and Cherwell Local Plan Part 1, and be in accordance with the NPPF.</p> <p>We propose the following goals and principles:</p> <ul style="list-style-type: none"> - To meet the unmet housing need of Oxford City Council in a way that creates sustainable, inclusive and mixed communities in suitable locations; - To bring forward housing in locations with good socio-economic links with Oxford City Council; - To bring forward housing in locations with transport links with Oxford City Council; (cont...)
PR-A-097	Barton Willmore / A2Dominion	4	<p>(cont...) - Provide more affordable market housing;</p> <ul style="list-style-type: none"> - To improve the affordability of housing, to meet identified needs whilst ensuring the viability of housing development and a reliable supply of new homes; - To facilitate economic growth to support housing, which compliments Oxford City and Cherwell District's economies; - To provide sufficient accessible, good quality services, facilities and infrastructure including green infrastructure, to meet health, education, transport, open space, sport, recreation, cultural, social and other community needs; - Protect the natural and built environment; - Address climate change.
PR-A-097	Barton Willmore / A2Dominion	5	<p>It is important to note that until the spatial strategy is set, the apportionment of unmet need cannot be determined. This should build on the existing vision as set out in the adopted Local Plan, which seeks to focus the bulk of the proposed growth in and around Bicester and Banbury (Local Plan Part 1, page 10). The vision for the Local Plan Review should address the need to provide a balanced housing supply in locations which are both sustainable and meet the needs of Oxford City Council. We consider this should be addressed by way of strategic allocations, focused at established settlements with strong links (transport and socio-economic) to Oxford City.</p> <p>As stated, Bicester is already identified as a location in which the bulk of the proposed growth in Cherwell will be accommodated (Paragraph VI Cherwell Local Plan Part 1). Furthermore, Bicester has good links to Oxford City. We consider there is capacity/ opportunity to accommodate further growth, to meet Oxford City's unmet need within Bicester.</p>
PR-A-097	Barton Willmore / A2Dominion	14	<p>A2Dominion proposes the following housing objectives:</p> <ul style="list-style-type: none"> - To meet the unmet housing need of Oxford City Council in a way that creates sustainable, inclusive and mixed communities in suitable locations; - Provide a mix of homes to meet current and expected future requirements in the interests of meeting housing need and creating socially mixed and inclusive communities; - Provide more affordable market housing;- To improve the affordability of housing, to meet identified needs whilst ensuring the viability of housing development and a reliable supply of new homes; - To bring forward housing in locations with good socio-economic links with Oxford City Council; - To bring forward housing in locations with transport links with Oxford City Council; - To provide sufficient accessible, good quality services, facilities and infrastructure including green infrastructure, to meet health, education, transport, open space, sport, recreation, cultural, social and other community needs.

PR-A-097	Barton Willmore / A2Dominion	15	<p>We consider growth areas should be identified throughout the District, based on a set spatial strategy. Growth areas should focus on key settlements as identified in Cherwell’s settlement hierarchy. Growth areas should have good links to Oxford City.</p> <p>Bicester provides an opportunity in which to deliver further housing. The town has strong socio-economic and transport links with Oxford. The Government’s recent announcement of Garden City status confirms the Government’s support for the development of Bicester. Any future development within Bicester must contribute to the Garden City status of the town and the Eco Bicester One Shared Vision document.</p>
PR-A-097	Barton Willmore / A2Dominion	28	<p>Site submission - North West Bicester Eco Town.</p>
PR-A-097	Barton Willmore / A2Dominion	6-9	<p>A2D agrees that the ‘area of search’ or plan area should be well related to Oxford City. This does not necessarily mean sites in closest proximity. It is a question of capacity and contribution to strategic priorities and spatial strategy.</p> <p>To the south of the District, north of Oxford, is designated Green Belt. Beyond the Green Belt, within the southern half of the District is Bicester.</p> <p>Bicester has good transport connections to Oxford, which will be boosted by the opening of the East West Rail Phase 1 Oxford Parkway station, linking Oxford, Bicester and London Marylebone. Bicester is also experiencing significant road infrastructure improvements, including increased capacity at the Howes Lane/ Bucknell Road junction and realigning of Howes Lane/ Lords Lane, potential new south east perimeter road through the strategic development site at Graven Hill, connecting the A41 which leads to the M40 and a new road through the South East Bicester development. Finally investigations are underway regarding improving road connectivity between Bicester and Milton Keynes as part of a Cambridge – Oxford Expressway. (cont...)</p>
PR-A-097	Barton Willmore / A2Dominion	6-9	<p>(cont...) In terms of economic links, the Oxfordshire Strategic Economic Plan focuses on a corridor to Bicester – the Oxfordshire ‘knowledge spine’. Bicester’s growing influence and accessibility on the ‘Oxfordshire knowledge-spine’ and the ‘Oxford Cambridge Arc’, and the presence of Oxford and Bicester village, means that there are a number of shared economic influences between the settlements.</p> <p>Due to its strong economic and transport connections with Oxford City, we consider Bicester would be a logical location in which to bring forward new homes to meet the unmet need of Oxford City.</p> <p>Key factors that should affect the spatial strategy are:</p> <ul style="list-style-type: none"> - Relationship with Oxford City; - Economic connections; - Transport links; - Social connections; - Social and community facilities/ services such as education and catchment areas; - Cherwell settlement hierarchy; - Landscape constraints; - Flood Risk; - Policy designations such as Green Belt; - Impact on heritage. <p>The spatial strategy needs to be set. Bicester provides an opportunity in which to deliver further housing. The Government’s recent announcement of Garden City status confirms the Government’s support for the development of Bicester. As already set out, the town has strong economic and transport links with Oxford. Furthermore, it does not fall within the Green Belt.</p>

PR-A-097	Barton Willmore / A2Dominion	10+11	<p>Paragraph 47 of the NPPF requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Moving forward, Cherwell has two options.</p> <p>Option One</p> <p>Oxford's unmet need, which Cherwell has to accommodate, has yet to be defined. Once apportionment has been agreed, CDC will need to review its housing target within its Local Plan to reflect the additional need. There would be a single housing target for Cherwell. (cont...)</p>
PR-A-097	Barton Willmore / A2Dominion	10+11	<p>(cont...) The Cherwell District five year housing land supply would then need to be reviewed to allow for the unmet need. The unmet need would become CDC's responsibility to deliver.</p> <p>Option Two</p> <p>Option two would involve the housing land requirements being set across districts, based on a spatial strategy, with a shortfall in one being addressed across the policy areas.</p>
PR-A-097	Barton Willmore / A2Dominion	12+13	<p>All housing issues identified in the consultation paper need to be taken into consideration. CDC must base policies in the Local Plan review on a robust evidence base, and ensure the Local Plan meets the full and OAN of Cherwell and Oxford City for market and affordable housing (including retirement housing) in a sustainable manner.</p>
PR-A-097	Barton Willmore / A2Dominion	16+17	<p>At this stage we have no comments. We do, however, reserve the right to comment on this topic in future rounds of consultation.</p>
PR-A-097	Barton Willmore / A2Dominion	18+19	<p>The NPPF requires planning that should proactively drive and support the provision of infrastructure, including delivering sufficient community and cultural facilities and services to meet local needs.</p> <p>We propose a study is undertaken to assess population projections of additional housing to establish likely infrastructure requirements. A study should also be commissioned assessing existing infrastructure in place, any shortfalls and where there is capacity to expand infrastructure. This study should consider both Cherwell and Oxford City and inform options for growth. (cont...)</p>
PR-A-097	Barton Willmore / A2Dominion	18+19	<p>(cont...) In 2015, Bicester was awarded 'Garden Town' status, enabling central Government funding of infrastructure and transport improvements alongside the housing and employment growth in Bicester. As set out in the consultation paper, significant infrastructure is being brought forward on strategic sites such as North West Bicester, Graven Hill, South East Bicester and South West Bicester. Facilities include, inter alia, primary schools, a secondary school, sports fields, community halls and a doctor's surgery.</p> <p>Growth should be focused in locations such as Bicester, where there are strong socio-economic links with Oxford City and opportunities to utilise existing infrastructure and capacity to deliver further infrastructure. As is the case for NW Bicester, infrastructure must be located in proximity to new homes to promote sustainable living patterns.</p>
PR-A-097	Barton Willmore / A2Dominion	20+21	<p>Bicester has significant areas of land allocated for both housing and employment in the adopted Local Plan. Demand will ensure that the housing land will be built out. The local authority and the OLEPs will need to do whatever they can to ensure job growth in Bicester matches housing growth.</p> <p>No reference is made to the Eco Business Centre on the Exemplar. The Eco Business Centre will provide a means to stimulate growth of environmental and ecoconstruction related businesses. Paragraph 5.90 refers to "environmental technologies and green construction with particular growth associated with the NW Bicester eco-development", but there is no mention of the role of the Eco Business centre in supporting this growth. The Eco Business Centre will be strategic in its role to support development of new businesses in a growth sector which would help to diversify and strengthen Cherwell's economy. In turn it will result in Bicester increasing its influence on the 'Oxfordshire knowledge-spine' and the 'Oxford Cambridge Arc'.</p>

PR-A-097	Barton Willmore / A2Dominion	22+23	At this stage we have no comments. We do, however, reserve the right to comment on this topic in future rounds of consultation.
PR-A-097	Barton Willmore / A2Dominion	24+25	Consideration should be given to natural environment constraints and opportunities when determining where additional growth should be located. Cherwell District is one of the least constrained authorities within Oxfordshire, for example the area has a significantly less Green Belt. We consider CDC could accommodate a higher level of Oxford's unmet need than other neighbouring local authorities. The distribution of unmet need across the County should reflect this. Areas with limited natural environment constraints, and with strong socio-economic links with Oxford City should be the focus for growth areas.
PR-A-097	Barton Willmore / A2Dominion	26+27	In accordance with Paragraph 1.26 of the NPPF, CDC should set out a positive strategy for the conservation and enjoyment of the historic environment. Additional growth should be sympathetic to and compliment the built and historic environment of Cherwell District.
PR-A-098	Stoke Lyne Parish Council	2&6	<p>The entire County is available to meet Oxford's unmet housing need although one burning question is whether the new housing should be located geographically close to Oxford (ie: Southern Cherwell) or where there are good transport links to Oxford.</p> <p>Southern Cherwell could impact the Green Belt – but it must be demonstrated that it is entirely justified that the Green Belt should be abandoned in that particular locality</p> <p>Another key question is whether any new housing in Cherwell built purely to accommodate Oxford's unmet housing need should be accompanied by employment generating development. Absolutely not!. Cherwell is seeking to help Oxford with its unmet housing need, not to provide land for commercial or industrial activity which could result in out-commuting from Oxford. Such development would not be seeking to meet Cherwell's own needs so would, in our view, be in contravention of Cherwell Local Plan Parts 1 and 2 (cont....)</p>
PR-A-098	Stoke Lyne Parish Council	1&15	<p>(cont...) The working figure for Oxford's unmet housing need is 15,000, which translates into 3,000 additional houses in each of the 5 Oxon areas (including Oxford City itself). To allow for some flexibility Cherwell has opted for a working figure of 3,500 for the Cherwell area. It is essential that Oxford, itself, absorbs as many houses as it can to meet its own unmet need before relying on neighbouring councils to help it out. If the figure of 3,500 is adopted it must be clear that it will not be revised upwards regardless of any pleadings by Oxford City Council.</p> <p>Any sites made available to meet Oxford's unmet housing need must adhere to Local Plan Part 2's maximum of 99 dwellings on "non strategic housing sites". The site should not be designated as "strategic" (ie: 100+ dwellings) because it is meeting Oxford's need when it would be designated as "non-strategic" to meet Cherwell's own need – all "strategic" sites to meet Cherwell's own needs form part of Local Plan Part 1</p>
PR-A-099	Summertown St Margaret's Neighbourhood Forum	17	<p>We agreed that there was no contiguous boundary between our wards and Cherwell District Council. However we can see that the choices of development areas may well affect our wards (Summertown and St Margaret's in North Oxford.</p> <p>Our area is divided by two main arterial roads into Oxford: The Woodstock and the Banbury roads. These roads are already very heavily used, especially at peak hours and badly polluted. In the coming years it is inevitable that the development of the Northern gateway will exacerbate the traffic on at least the Woodstock Road.</p> <p>Our concern for any overspill housing development is that it should not take place without increased sustainable transport capacity being created first. It is inevitable that, if you are to account for Oxford's undercapacity in housing, then the residents of those homes will commute into Oxford. In that case the only way of protecting our residents from the intrusion and pollution of this commute is to ensure that there is extra bus or train capacity associated with sufficient extra parking outside Oxford.</p>

PR-A-100		1	<p>Oxford and the surrounding areas have an unmet transportation infrastructure need. Every week day thousands of man hours are wasted by commuters trying to drive into and within oxford. similar amounts of time are wasted by drivers on the A34 elsewhere in Oxfordshire. As well as time there are major environmental and personal costs to this congestion.</p> <p>Building more houses in Cherwell can only make this position worse and the Council should pause all building until the transportation problem has been solved.</p>
PR-A-100	K Pelton	2	<p>Wherever possible employment should be local to housing. this may mean moving some major sources of employment outside Oxford.</p>
PR-A-100	K Pelton	3	<p>Oxford's key issues are a) too many employers that don't really need to be there. The University has to be there, but the County Council , courts, and much of the NHS could be located elsewhere. b) Oxford shows no determination to put in good public transportation infrastructure. Just upgrading the existing railway to Bicester has been incurred a great many delays. Oxford is well suited to a tram system and to rail systems giving good access to the city from kidlington witney etc.a third change that would make a significant difference is the provision of safe pollution free cycling routes into the city.Once in the city provision for cyclists is not bad (but could be improved) but cyclists take their lives in their hands on many of the routes into the city and thus drive instead.Congestion charging is well worth looking at and technology is making such schemes much more affordable. c) in terms of housing Oxford should start to think of the high cost of housing in Oxford as a sign of success , not as a problem to be solved. It's not holding back the economy in Central London, or numerous other places such as Hong Kong.</p>
PR-A-100	K Pelton	4	<p>Better public transport, safer cycling and the elimination of traffic congestion. Bicester now has good transportation links (when the traffic is not jammed) and a great deal of housing has been added without much thought. It now desperately needs more local employment and a vision to revitalise the town centre which still feels slightly run down in places.</p>
PR-A-100	K Pelton	5	<p>Top of the focused vision should be better road, rail and cycling infrastructure. Cherwell might be becoming more prosperous by conventionally measured GDP but its not clear that anyones quality of life is improving with Cherwell's roads becoming increasingly dangerous and more and more time being spent in traffic congestion. Cherwell needs a focal point in the South of the District so that not all economic and leisure activity gets sucked into Oxford. Neither Bicester nor Kidlington offer this at present. Cherwell needs a centre in the south of the District offering comparable to or better facilities than Abingdon</p>
PR-A-100	K Pelton	6	<p>We would question the premise that an are of search is needed. It depends what you mean by" well related". It should be at the far end of highly efficient public transport links. Many would think that well related is a mealy mouthed way of saying close which is another way of saying building on the green belt</p>
PR-A-100	K Pelton	7	<p>As stated, transport links, local employment and green belt protection</p>
PR-A-100	K Pelton	8	<p>Yes.</p>
PR-A-100	K Pelton	9	<p>No. Whilst Noke opposes the development of the green belt in general it would like and in the past has supported the building of individual houses on carefully chosen local sites. A modest increase in population would make Noke a more sustainable and vibrant community provided it has local support. I dare say other local village would have the same views.</p> <p>What would be disastrous would be a housing estate between Woodeaton and Oxford and i suspect we are already getting something of the sort with Barton West and don't recall any./much local consultation on this. It is also very important that the Woodeaton quarry is restored as agricultural land and not used as housing. There is an approach that involves concreting over the Oxford green belt and building another ring road around the outside, but i doubt if there will be much appetite for it. At present any mass building on the Oxford Green belt will just make the transportation problems in and around the city worse.</p>

PR-A-100	K Pelton	10	No.
PR-A-100	K Pelton	11	Cherwell shouldn't
PR-A-100	K Pelton	12	the last 5 words of 5.37 are key. Transportation infrastructure is already inadequate and more housing can only make it worse.
PR-A-100	K Pelton	13	Most of the preceding paras are just statements of fact rather than issues, so its not really clear what issues Im supposed to comment on
PR-A-100	K Pelton	14	1. No deterioration in the already very poor traffic and congestion situation on roads into and around Oxford 2. protection of the Green Belt
PR-A-100	K Pelton	15	If locations as far away from Oxford as possible are considered it will be less likely that the residents of these houses will just spend their time travelling back into Oxfrd making congestion in and around Oxford still worse.
PR-A-100	K Pelton	16	1. As already pointed out transportation in and around Oxford is already very inadequate and more housing can only make it worse. 2. The A34 should be upgraded to 3 lanes demolishing as much of Botley as necessary 3. The ring road could also be upgradedd to three lanes 4. Oxford should implement congestion charging 5. Safe cycle routes (some across farmland) into Oxford from surrounding villages should be built. Many more people would cycle and encourage their children to cycle if it was perceived to be safe. Building more houses and dumping more traffic on local roads is just making it progressively more dangerous at present. An opportunity was missed to put in a cycle track alongside the upgraded Bicester line. 6. Oxford is well suited to a tram system, which presumably it had at one time. 7. rail links should be created or reinstated from Witney, Thame, and Abingdon. Kidlington should get a station on the Banbury line 8. so called Oxford London airport needs to decide if it wants commercial operations or not. modest levels of commercial traffic would assist the local economy and probably create less noise nuisance than the flying school. 9. Freight/Distribution hubs at motorway junctions can only make traffic worse 10 Oxford needs to improve access from the ringroad to the city at certain key points. Its ridiculous that the very large volume of traffic generated by the JR all goes through Headington or Marston.
PR-A-100	K Pelton	17	Cycling cannot be made safer with associated environmental and health benefits as long as more and more traffic is being dumped onto a road system around Oxford designed mainly for rural traffic
PR-A-100	K Pelton	20	A thriving local economy does not need to be synonymous with more people, more traffic and more housing
PR-A-100	K Pelton	21	As stated the locations should be remote from Oxford to avoid exacerbating Oxford's traffic problems
PR-A-100	K Pelton	22	Sustainability would be greatly assisted if cycling were encouraged, road pricing introduced and good (not bus) public transport links built

PR-A-100	K Pelton	23	Unless these issues are tackled in a much more energetic fashion than hitherto additional housing should be a long way from Oxford
PR-A-100	K Pelton	24	<p>1. Undergrowth control and dredging have been neglected along the Ray and Cherwell. This would alleviate flooding and make farmland more productive. The flood channel around Oxford may also assist.</p> <p>2. Although Cherwell has very pleasant countryside only a small percentage of the population currently use it. more could be done to encourage its recreational use (rather than spending the time sitting in a traffic jam to Bicester Village at weekends). recreational cycling and walking could all be encouraged. Many footpaths are little more than a sea of mud or flooded in winter and these could be upgraded. Otmoor is a great local resource but very underused.</p> <p>3. fly tipping and littering along local roads are endemic spoiling many people enjoyment of the countryside. It would be good to see throwing litter out of car windows receiving as much opprobrium as racism, homophobia and sexism.</p>
PR-A-100	K Pelton	25	Less housing will mean less litter
PR-A-100	K Pelton	26	With the exceptions that the document correctly identifies the generality of the built environment is of little value in Cherwell and we shouldn't be too worried about demolishing parts of it, for instance in central Bicester or Kidlington, in order to implement larger visions. Just be careful not to put up something which will look even worse in 25 years.
PR-A-100	K Pelton	27	Bits of Oxford itself could be replaced by higher density housing. Making say bicester and attractive centre in its own right is a key to alleviating Oxford's traffic problems
PR-A-100	K Pelton	28	Notwithstanding the fact that Noke opposes the development of the green belt in general (and in particular the fields between Woodeaton and Marston) it would like and in the past has supported building of individual houses on carefully chosen local sites. A modest increase in population would make Noke a more sustainable and vibrant community provided it has local support.
PR-A-100	K Pelton	18+19	if infrastructure in this context excludes transport then I think it can be adapted as necessary.
PR-A-101	Ambrosden Parish Council	1	<p>We do not seek to dispute Oxford's housing need but consider Oxford City have not fully demonstrated full utilisation of their land,via a full land use survey. In addition Oxford City Council should consider promote halls of residence to students releasing housing. The high level of affordable provision required by Oxford City Council makes development unattractive within Oxford,and Oxford City Councilshould review their planning policies to encourage additionaldevelopment. Consideration should be given to increasing residentialdevelopment densities and development heights in Oxford.</p> <p>Cherwell should not accommodate additional dwellings until Oxford City Council has demonstrated it has fully reviewed its planning policies and development strategies to maximise development within its boundaries.</p>
PR-A-101	Ambrosden Parish Council	2	<p>Traffic surveys in the Parish of Ambrosden suggest that there is significant commuting to Oxford, and that Oxford is a major employment hub,so it is questionable if additional employment generating development is required.</p> <p>If additional employment is created,it should be in sustainable locations where public transport can be utilised to minimise additional traffic impacts,positioned along the Oxford -Bicester railway line,or along the A34 corridor.</p> <p>B8 if proposed should be located adjacent the M40 Junction 9,10 or 11,and not in rural areas,or adjacent to Bicester.</p>
PR-A-101	Ambrosden Parish Council	4	The key goal is to limit impact on development on Cherwell, and its inherent infrastructure Impacts.

PR-A-101	Ambrosden Parish Council	6	Oxford is the major employment hub for the whole region and therefore the area of search should include the whole district however it may be appropriate to examine the potential for an urban extension to Oxford or new garden village close to Oxford to accommodate the housing need in one location where infrastructure provision can be easily provided. Local Plan Part 2 consultation highlights that there are major infrastructure issues for the Bicester area with regards to Highways, Power supply and Foul water capacity, which limit additional development in the Bicester Area.
PR-A-101	Ambrosden Parish Council	14	Traffic surveys in the Parish of Ambrosden suggest that there is significant commuting to Oxford, and that Oxford is a major employment hub, so if additional housing and employment is spread around the whole district, there will be increases in traffic, and infrastructure demands will need to be addressed for the entire district.
PR-A-101	Ambrosden Parish Council	16	Junction 9 M40 needs to be redesigned, to give direct slip roads from the A41 to M40 South. Capacity of the A34 should be increased, and potentially re-routed to join with the A43 at Junction 10. Consideration should be given to a station on HS2 at the A43 between Bicester and Brackley. No development should commence until the Oxford Bicester line is operating between Cowley and Bicester. Additional development should be located along the Cambridge- Oxford Expressway.
PR-A-101	Ambrosden Parish Council	18	Local Plan Part 2 consultation highlights that there are major infrastructure issues for the Bicester area with regards to Highways, Power supply and Foul water capacity, which limit additional development in the Bicester Area.
PR-A-101	Ambrosden Parish Council	20	Any additional employment should be of a wide mix and not limited to 88. Employment should be located in sustainable locations close to transport hubs. Tourism should be promoted.
PR-A-101	Ambrosden Parish Council	22	Sustainability can be addressed via policies in the local plans part 1 and 2 and SPD's on Biodiversity, landscape and energy efficiency. Sustainable travel could be enhanced by a station on HS2 at the A43 between Bicester and Brackley. No development should commence until the Oxford Bicester line is operating between Cowley and Bicester. Additional development should be located along the Cambridge- Oxford Expressway.
PR-A-101	Ambrosden Parish Council	24	Additional development must not affect the flood plain or increase the risk of river or surface water flooding and must be SUDs compliant. Cherwell should undertake a land review and designate nature reserves and designate green spaces which must not be developed.
PR-A-101	Ambrosden Parish Council	7, 9, 11, 15	Oxford is the major employment hub for the whole region and therefore the area of search should include the whole district however it may be appropriate to examine the potential for an urban extension to Oxford or new garden village close to Oxford to accommodate the housing need in one location where infrastructure provision can be easily provided. Local Plan Part 2 consultation highlights that there are major infrastructure issues for the Bicester area with regards to Highways, Power supply and Foul water capacity, which limit additional development in the Bicester Area.
PR-A-101	Ambrosden Parish Council	8, 10, 12	Oxford is the major employment hub for the whole region and therefore the area of search should include the whole district however it may be appropriate to examine the potential for an urban extension to Oxford or new garden village close to Oxford to accommodate the housing need in one location where infrastructure provision can be easily provided.
PR-A-102	P & A Woodfield / Chard		28 Site submission - Bretch Farm, Broughton Road, Banbury
PR-A-103	David Wilkins / Ian Wilkins		28 Site submission - Land East of Hampden Farm, Kidlington
PR-A-104	Molyneux Planning / U Stay		28 Site submissions - Land at Bunkers Hill; Land at Shipton on Cherwell
PR-A-105	RPS Group / Rowland Bratt		28 Site submission - Land South of Wards Road, Bodicote
PR-A-106	Molyneux Planning / Shipton Ltd		28 Site submission - Shipton on Cherwell Quarry

PR-A-107	JM Osborne & Co / G & M Loggin	28 Site submissions - Land adjoining playing field, Fewcott, Ardley; Land adjoining Southern Edge of Village, Ardley
PR-A-108		28 Site submission - Oak View, Milcombe
PR-A-109	Kemp & Kemp / Newcore Capital Management LLP	28 Site submission - Oil Storage Depot, Bletchingdon Road, Islip
PR-A-110	H.A. Hart & Sons	28 Site submission - Hornton Hill Farm, Quarry Road, Hornton
PR-A-111	JPPC / Mr R. Davies	28 Site submission - Land at no.40 and to the rear of 30-40 Woodstock Road East, Begbroke
PR-A-112	Carl Middleditch Architect / Messrs R & T. Taylor and Mrs J.Treadwell	28 Site submission - Church Field, Wendlebury Road, Wendlebury
PR-A-113	Carl Middleditch Architect / D.R. Jones & Son	28 Site submission - Newlands/Caulcott Farm/Greenway, South Street, Caulcott
PR-A-114	Carl Middleditch Architect / Mesdames Oneil & Dwyer	28 Site submission - Oxford Road, Deddington
PR-A-115	Carl Middleditch Architect / Smiths of Bloxham	28 Site submission - Newlands Caravan Site, Milton Road, Bloxham
PR-A-116	Court Consulting / Adrian Wilcox	28 Site submissions - Field known as Baby Ben, adjoining Northampton Road, Weston on the Green; Land adjoining Caerleon, Northampton Road, Weston on the Green; Land opposite Staplehurst Farm, Church Road, Weston on the Green
PR-A-117	Fisher German LLP / Mr Allen, Mrs Aries, Mr Stroud and Mr Lombard	28 Site submission - Site to East of M40, Overthorpe
PR-A-118	Quay Associates / Manor Farm	28 Site submission - Land at Bell Street, Hornton
PR-A-119	Helen Tredwell	28 Site submission - Durrants Gravel, Finmere
PR-A-120	Framptons / Banbury AAT Academy	28 Site submission - Banbury Academy, Ruskin Road, Banbury
PR-A-121	Phillips Planning Services Ltd / Trinity College	28 Site submissions - Land to the North of Stratford Road (Site 1); Land to the North of Stratford Road and West of The Firs (Site 2); Land to the North of Stratford Road (Site 3); Land to the North of Stratford Road (Site 4)

PR-A-122	Savills / Trinity College Oxford		28 Site submission - Land adjoining Dover Avenue and Thornbury Drive, Banbury
PR-A-123	Strutt Parker / Jane Hazel-Wright and Carl Wright		28 Site submission - The Paddock, Berry Hill Road, Adderbury
PR-A-124	Laws & Fiennes / Broughton Estate		28 Site submissions - Land at Lower End, Shutford; Land to the North of Banbury Road, Shutford; Land to the North of Broughton Road, Banbury
PR-A-125	Fisher German LLP / Kevin & Emily Bishop		28 Site submission - Land West of Hook Norton Road, Sibford Ferris
PR-A-126	Savills / Mr O'Neil		28 Site submission - Dymock Farm, Buckingham Road, Caversfield
PR-A-127	Savills / Mr R. Shouler and Ms J. Shouler		28 Site submission - Land at Lodge Farm, Chesterton
PR-A-128	Savills / Barwood Strategic Land II LLP		28 Site submission - Land to the South of Crouch Farm, Banbury
PR-A-129	Kemp & Kemp LLP / Sheehan Group of Companies		28 Site submission - Knightsbridge Farm, Yarnton
PR-A-130	Advance Land & Planning Limited / Leonard Cheshire Disability		28 Site submission - Land West of Banbury Road, Adderbury
PR-A-131	Savills / Philip King Homes Trust		28 Site submission - Land to the East of Kidlington and West of the A34
PR-A-132	Framptons / E.P.Barrus, Pye Construction, Mr & Mrs Fletcher, Mr Sparks, Mr & Mrs Holford, Mr & Mrs Dean, Mr & Mrs Noon	1	<p>At para 2.16 it is stated that there is an agreed figure of 15000 dwellings amounting to Oxford City's unmet housing need (refer para 2.13). It is then suggested that this figure 'to be distributed evenly between Oxford, Cherwell, West Oxfordshire, South Oxfordshire and Vale of White Horse' which would produce a requirement of about 3000 homes per authority area.</p> <p>The unmet housing need arises because as stated at para 2.12 'that is the level of need that cannot presently be met by Oxford City Council'. It is therefore inappropriate for Oxford to be included in the distribution of dwellings at para 2.16. Rather the 15000 figure of unmet housing need should be distributed between the 4 authorities of Cherwell, West Oxfordshire, South Oxfordshire and Vale of White Horse Councils amounting to a figure of 3750 dwellings per Authority area. It is submitted therefore that a working assumption should be made of 4250 homes for Cherwell District. The public interest is better served by an over provision of housing through the Plan process than an under provision at this stage in the Plan making process.</p>

PR-A-132	Framptons / E.P.Barrus, Pye Construction, Mr & Mrs Fletcher, Mr Sparks, Mr & Mrs Holford, Mr & Mrs Dean, Mr & Mrs Noon	6	It is agreed that an area of search for the partial review document should be well related to Oxford City.
PR-A-132	Framptons / E.P.Barrus, Pye Construction, Mr & Mrs Fletcher, Mr Sparks, Mr & Mrs Holford, Mr & Mrs Dean, Mr & Mrs Noon	7	Factors that should influence the area of search should include the connectivity of the area to Oxford City, and maintaining the integrity of the Green Belt. As such, locations including Former RAF Upper Heyford, which are well related to the City and just beyond the Green Belt should be considered within the area of search.
PR-A-132	Framptons / E.P.Barrus, Pye Construction, Mr & Mrs Fletcher, Mr Sparks, Mr & Mrs Holford, Mr & Mrs Dean, Mr & Mrs Noon	12	At paragraph 5.34 it is stated as a matter of fact that Former RAF Upper Heyford is not situated on an 'A' road. It is submitted that this paragraph fails to properly recognise that Former RAF Upper Heyford is well located for access onto the A43 to the east and the A4260 to the west. As such, Former RAF Upper Heyford is very well located to the primary highway network for the main part of any journey to Oxford and, as noted, has the particular advantage of proximity to a rail station at Lower Heyford.
PR-A-132	Framptons / E.P.Barrus, Pye Construction, Mr & Mrs Fletcher, Mr Sparks, Mr & Mrs Holford, Mr & Mrs Dean, Mr & Mrs Noon	15	Former RAF Upper Heyford is a growth location within the adopted Core Strategy. The Core Strategy allocates growth for some 2361 dwellings under Policy Villages 5 together with associated development to serve the needs of a new community. Former RAF Upper Heyford is capable and suitable for accommodating additional housing development while maintaining the integrity of the historic asset comprising the former Cold War airbase. Such additional development as identified at the eastern side of former RAF Upper Heyford bounded by the two roads would be well related to the existing built up boundary and provide a useful source of additional housing to contribute to the unmet needs of Oxford. The land edged red on the accompanying plan would provide for an enlarged and integrated settlement pattern.
PR-A-132	Framptons / E.P.Barrus, Pye Construction, Mr & Mrs Fletcher, Mr Sparks, Mr & Mrs Holford, Mr & Mrs Dean, Mr & Mrs Noon		28 Site submission - Land West of Chilgrove Drive and North of Camp Road, Upper Heyford
PR-A-133	P3 Eco Limited (P3)		28 Site submission - Land at Little Chesterton, Bicester
PR-A-134	P3 Eco Limited (P3)		28 Site submission - Land to West of Himley Village, Middleton Stoney Road, Bicester
PR-A-135	Indigo Planning Ltd / McKay Securities PLC		28 Site submissions - Lower Cherwell Street Industrial Estate, Banbury; McKay Trading Estate, Station Approach, Bicester
PR-A-136	Larkstoke Properties Ltd / Mr and Mrs Derrer		28 Site submission - South Lodge, Fringford Road, Caversfield

PR-A-137	Kemp & Kemp / Carol Ann Parsons		28 Site submission - Stratfield Farm, Oxford Road, Kidlington
PR-A-138	Adalta Real / John Phillips		28 Site submission - The Plain, Land East of B4100, Bicester
PR-A-139	Kemp & Kemp / Mewsade (Eastern) Ltd		28 Site submissions - Land North of Rau Court, Caversfield; Land South of Springfield Road, Caversfield
PR-A-140	Kemp & Kemp LLP / W.Lucy & Co Ltd		28 Site submission - South of Sandy Lane, Begbroke
PR-A-141	Bilfinger GVA / Mr L.Durant		28 Site submissions - Land adjacent Oxfordshire Inn, Heathfield; Heyford Leys Camping Park, Camp Road, Upper Heyford
PR-A-142	JP Planning Ltd / Neil Wingfield		28 Site submission - Land and buildings at 12 Heath Close, Milcombe
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	1	<p>While the authorities within Oxfordshire are currently working to define the respective quantities of housing that each must contribute to meet the City's needs, we consider that the differing situations and contexts within each of the Districts means that an equal apportionment is most unlikely to be justified. The Vale of White Horse (VoWH) and West Oxfordshire Districts are the most constrained in terms of landscape designations (AONBs) and also have inferior transport connections to Oxford when compared to South Oxfordshire and Cherwell.</p> <p>South Oxfordshire and VoWH have historically focused a large amount of growth around Didcot and Wantage/Grove but both settlements are now in the process of delivering their respective allocations which will take at least the next twenty years to achieve.</p> <p>Cherwell is by contrast relatively unconstrained by landscape designations and has excellent transport connectivity with Oxford via the two direct railway lines (GWR to Banbury and Birmingham) and Chiltern to Bicester, Marylebone and Milton Keynes (planned)).</p> <p>In this context we consider that Cherwell should accommodate more than its proportionate amount of Oxford's unmet need. We consider a figure of 6,000 homes is more appropriate.</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	2	<p>We consider that locations for additional housing should wherever possible and appropriate, be supported by employment generating development in order to create the potential for people to live and work in close proximity and thereby avoid the need to travel. Such development can include a wide variety of uses including schools, shops, community facilities as well as office and industrial space.</p> <p>At Great Heyford we are proposing to provide primary and secondary schools as well as a nursery; shops; health; and community facilities, all of which will provide employment opportunities. We are also proposing 250,000 sq. ft. of office/R&D space for use by the College or other parts of the University, as well as third parties. These uses combined have the potential to provide over 1,400 new jobs.</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	4	<p>Additional growth should seek to provide homes in an attractive, high quality environment which does not have an adverse impact on Areas of Outstanding Natural Beauty or other areas protected for their inherent qualities or constraints (such as floodplain and/or Green Belt), and which provides the ability for residents and visitors to travel to Oxford (where the need is focused) and beyond in as environmentally friendly a way as possible. The opportunity to provide improvements to infrastructure to benefit existing residents and visitors should also become an objective of planned growth.</p>

PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	6	Any area of search for meeting Oxford's unmet need should include location(s) that can deliver on the principles above, and which are as close to Oxford as possible without compromising the Green Belt around the City. Critically these locations must be directly accessible to rail services into Oxford from either existing or potential new stations where those are practicable.
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	15	<p>The Council should consider our proposed site at Great Heyford as a strategic location capable of delivering a majority of the suggested housing need that Cherwell DC should provide for (5,000 of the 6,000 homes).</p> <p>Great Heyford is our proposal for a sustainable new community of around 5,000 new homes that will serve the needs of the City of Oxford and the community governed by Cherwell District Council. Our vision is to create the new community of Great Heyford as an extension of the village of Lower Heyford, ensuring that the historic character of Lower Heyford is preserved and that the district identity of Upper Heyford is also maintained together with its military heritage.</p> <p>This will create a community that will utilise the existing rail infrastructure to allow commutng both North and South and create up to several thousand local jobs including potential facilities for Oxford University. A primary purpose of it is to meet the City of Oxford's unmet housing needs to 2031. It will not, however, be a dormitory location because of the priority being given to creating local jobs. (cont...)</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	15	<p>(cont...) The outline masterplan envisages the creation of 134 hectares of parkland principally alongside the canal and river Cherwell that will enhance the views from Rousham and create a new accessible beauty spot to be enjoyed by local residents and visitors alike. 27 hectares of this parkland will potentially create a heritage centre around the ancient hill fort that seemingly existed on the high ground above the current village of Lower Heyford.</p> <p>Our proposed new 'hill-top community' is consistent with English tradition and the elevated position of Steeple Aston and Upper Heyford.</p> <p>Our vision for Great Heyford is for it to be an 'energy positive' development; that is to say, one which makes a net contribution to the national grid rather than drawing energy from it. We will achieve this through a combination of careful design and layout making the most effective use of the site's topography and microclimate as well as employing the most efficient fabric for buildings. (cont...)</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	15	<p>(cont...) The urban extension provides the opportunity to deliver a range of essential facilities for Lower Heyford which currently does not exist. These include a new local centre located at the intersection of Station Road and the B4030. It will include a range of retail and community facilities laid out in a traditional arrangement with a focus on high quality public realm.</p> <p>Thew new extension will also deliver new primary and secondary schools which the current village is without. These will be located centrally to provide for accessible walking routes for the village.</p> <p>We have taken careful account of Rousham Park in defining the extent of the proposed development area to ensure that views from and across the Park will not be interrupted by any built development within Great Heyford. The valuable Heritage context will strongly shape the new extension. ZTV studies have been undertaken to define the western extents of the extension to ensure that important countryside views from Rousham House and Gardens are effectively safeguarded. (cont...)</p>

PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	15	<p>(cont...) Our proposals allow for the provision of a major new publicly accessible park along the valley side south of Lower Heyford. This will provide significant public benefit to existing and future residents by providing an opportunity for people to enjoy the landscape in a generously proportioned public park. We are also committed to working with conservationists to explore the practicalities of archaeological investigations and possibly a heritage centre around the crop circles.</p> <p>The rationale and vision for Great Heyford is set out in the attached promotional document.</p> <p>Key Benefits: The City of Oxford needs a very substantial number of new homes to sustain growth projections over the period 2016-2031. Estimates vary but the number could well be 18,000 or more outside what the city itself can provide. The key benefit of our proposal is that it would aabout 28% of this requirement in one exceptionally sustainable satellite location that can be delivered over the next twenty years. (cont...)</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	15	<p>(cont...) These proposals are designed to be complementary to the allocations within the recently adopted Cherwell District Local Plan, and importantly offer a significant solution to CDC's duty to cooperate which the Planning Inspectorate expects by June 2017.</p> <p>As well as providing market and affordable homes for over 11,000 people, Great Heyford could provide up to 250,000 ft2 of employment space including a significant office and R&D hub for use by the University as well as office and employment space for other companies to use, Oxford University needs more facilities to compete with Cambridge and overseas Universities and there is limited space to accommodate these within the city. Provision of a new hub at Great Heyford could assist in creating facilities and employment that would enhance the University's global competitiveness and reputation. The objective of creating an 'energy positive' development will assist in consolidating Cherwell and Oxford as leaders in the creation of environmentally sustainable communities. (cont...)</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	15	<p>(cont...) New retail space, health and community facilities will be provided alongside the commercial space to provide new as well as existing residents and employees sufficient new facilities that they can use without the need to travel to higher order centres such as Bicester. This boost in provision will benefit those that have experienced a decline in local retail and leisure facilities in recent times.</p> <p>Great Heyford would include new education provision at both primary and secondary levels and would focus vehicular traffic away from the historic core of Lower Heyford and towards Bicester to the east and Oxford to the south. Specific provision will be made for new residents and those working in the employment space to leave their cars within a car park close to the eastern end of Lower Heyford and either walk, cycle or take a shuttle bus down to the railway station to catch services to Oxford and Banbury. (cont...)</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	15	<p>(cont...) The opportunity exists now at Great Heyford to create a new focus for a highly energy efficient community that can benefit from and augment the existing investment at Upper Heyford. Taken together, new communities at both settlements could provide an even more sustainable focus that would be of a scale to enable them to support more of their own functions and needs as well as being in a position to make use of the rail connection to Oxford and Bnabury and beyond for 'higher order' functions.</p> <p>The advantages of the scale of development possible at Great Heyford (as well as when combined with that at Upper Heyford) are that it allows a more comprehensive package of services, facilities and public amenities to be provided which are not achievable with developments of smaller scale that are more widely scattered.</p> <p>In summary, residents of Great Heyford would be within 20 minutes of the centre of Oxford via a sustainable mode of travel (the train), allowing people to work and/or study in the city while gaining the benefits of living outside the city. The development of a new community could fund significant public benefits that could be enjoyed by residents and visitors alike, including new publicly accessible parkland along the eastern slops of the Cherwell valley and new community faciltiies including healthcare, schools and shops that would benefit new and existing residents alike.</p>

PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	18	<p>The existing railway station at Lower Heyford provides the opportunity to serve the proposed new community at Great Heyford and provide transport into Oxford City Centre as well as north to Banbury and Birmingham. The rail service currently allows travel into the City within 17 minutes but with extra patronage the service could be improved further and in particular the frequency increased.</p> <p>Once in Oxford City Centre, a proportion of people will wish to travel to the science parks and employment areas in the south and southeast of the City, and we consider that the potential to provide a shuttle bus service between the rail station and those destinations should be explored, to improve their accessibility and provide connections with rail services and other bus routes. (cont...)</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	18	<p>(cont...) The opportunity exists to create a step-change in the provision of public transport services for the communities of Lower and Upper Heyford by capitalising on the opportunity presented by the railway station at Lower Heyford. A new bus route will deliver residents of the extension to and from the railway station at scheduled times. The bus will also serve the local facilities within the new extension as well as a proposed park and ride which will be located to serve the residents of Great Heyford and further afield and thereby connect them to the station. It will also materially benefit residents at both parts of Upper Heyford.</p> <p>The entire extension will be within a 20-minute walking distance of the station and a network of easily accessible pedestrian and cycle routes will be incorporated. Vehicular travel on the B4030 west of Station Road will be minimised and the existing conservation area of the village will be restricted primarily to existing residents and public transport. The primary vehicular access will be along Station Road, the B4030 east of the conservation area and along Port Way which all present the opportunity of upgrading as required.</p>
PR-A-143	Bonnar Allan Limited / Corus Christ College Oxford	28	Site submission - Land South East of Lower Heyford
PR-A-144	Framptons / Albion Land Ltd	28	Site submission - Land at North West Bicester
PR-A-145	Framptons / Mr and Mrs Donger	28	Site submission - Land off Dukes Meadow Drive, Banbury
PR-A-146	Scottish and Southern Energy	18	<p>Refer to letters dated 8 September 2014, together with attachments -</p> <p>At this stage, I can only provide general guidance on the provision of electricity infrastructure and the treatment of any existing infrastructure in relation to future development.</p> <p>Connections for new developments from existing infrastructure can be provided subject to cost and time-scale.</p> <p>Where existing infrastructure is inadequate to support the increased demands from the new development, the costs of any necessary upstream reinforcement required would normally be apportioned between developer and DNO (Distribution Network Operator) in accordance with the current Statement of Charging Methodology agreed with the industry regulator (OFGEM). Maximum time-scales in these instances would not normally exceed around 2 years and should not therefore impede delivery of any proposed housing development. (cont...)</p>

PR-A-146 Scottish and Southern Energy	18	<p>(cont...) Where overhead lines cross development site, these will, with the exception of 400 kV tower lines, normally be owned and operated by Scottish and Southern Energy Power Distribution (SSEPD).</p> <p>In order to minimise costs, wherever possible, existing overhead lines can remain in place with uses such as open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Where this is not practicable, or where developers choose to lay out their proposals otherwise, then agreement will be needed as to how these will be dealt with, including agreeing costs and identifying suitable alternative routing for the circuits. The existing customer base should not be burdened by any costs arising from new development proposals.</p> <p>To ensure certainty of delivery of a development site, any anticipated relocation of existing overhead lines should be formally agreed with SSEPD, prior to submission of a planning application. (cont...)</p>
PR-A-146 Scottish and Southern Energy	18	<p>(cont...) I trust the above is helpful to you at this current stage of your deliberations and can be included in the proposed CDP document, but you can contact me directly on the above telephone number should you require any further advice, particularly relating to specific sites.</p> <p>However, for your information and assistance, please see the attached Appendix A, which includes additional information in respect of the areas detailed in your sites document, where there overhead lines and / or significant numbers of dwellings proposed.</p>
PR-A-147 Environment Agency	18	<p>In accommodating and allocating the additional 3500 within the Local Plan Part 1 we advise Cherwell District Council to consider carefully whether there will be adequate infrastructure such as suitable foul drainage capacity/water supply etc. We are pleased that you have confirmed in paragraph 5.135 that the district is in an area of water stress with water resources at a premium and we are aware that you are in the early stages of producing a Water Cycle Study. We would advise that the Water Cycle Study should support the Sustainability Appraisal as a key evidence document and this will help enable decision makers to identify any infrastructure issues early in the plan making process. We are really pleased to see that in paragraph 5.72, the importance of supporting any additional growth with the necessary infrastructure is highlighted.</p>
PR-A-147 Environment Agency	24	<p>We are pleased to see that paragraph 5.37 has confirmed that the partial review will look to minimize adverse environmental impacts. The previous allocations within this plan located some of Cherwell's site allocations at areas of Flood Risk. This was because many of the sites allocated were in areas identified for regeneration in towns such as Banbury and Bicester. A Flood Risk Sequential Test was passed to support this approach. However, Cherwell District has significant areas of land at the lowest risk of flooding (Flood Zone 1) and we feel that there would be no reason to allocate any of the 3500 of Oxfords unmet need housing in Flood Zones 2 or 3. The NPPF clearly states the new development should be steered to areas at the lowest risk of flooding and Cherwell District Council should avoid flood zones 2 and 3.</p>
PR-A-147 Environment Agency	25	<p>As stated previously in the introduction to this letter, we note that Oxford City is unable to meet its housing need because of policy and environment constraints, such as flood risk. We would support the same approach for the allocation of the unmet need in the Cherwell District, in that development should NOT be located in areas of flood risk (Flood Zone 2 or 3) or nature conservation value.</p>

PR-A-147 Environment
Agency

We are pleased with the submitted Sustainability Appraisal Scoping Report which seems comprehensive. We support the following objectives:
7) To conserve and enhance and create resources for biodiversity
11) To maintain and improve the water quality of rivers and to achieve sustainable water resource management
12) To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment
However, there are two evidence documents that we feel are necessary to adequately inform the Sustainability Appraisal which we can't see mentioned.
(cont...)

PR-A-147 Environment
Agency

(cont...) Firstly, we recommend that a Water Cycle Study is carried out for the Cherwell District. A number of Neighboring LPAs have already completed their Water Cycle Studies and it has helped them identify areas where infrastructure capacity is an issue and also the potential impact this could have on the water environment. We understand that Cherwell District Council are at an early stage in production of a Water Cycle Study and we advise that it should be a key evidence document in support of the Sustainability Appraisal. Secondly, Cherwell District Councils Strategic Flood Risk Assessment (SFRA) should be considered a living document and needs to be kept up to date with the latest guidance and advice. New flood risk climate change allowances have recently been published and can be found here. We expect Cherwell District Council consider these new allowances and update the SFRA as necessary. The new climate change allowances will potentially alter quite significantly flood map extents and make some areas unsuitable for development.

PR-A-148 Nathaniel Lichfield
& Partners / Kenley
Holdings

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Site submission - Letchmere Farm, Camp Road, Upper Heyford