

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

**SUBMISSION PLAN
STATEMENT OF CONSULTATION
FEBRUARY 2018**

PART 3

**CONSULTATION ON THE PROPOSED SUBMISSION PLAN
February 2018**



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1. Introduction

This Part 3 of the Statement of Consultation reports on the consultation undertaken on the Proposed Submission Local Plan (July 2017 to October 2017) and subsequent engagement undertaken, where necessary, to assist the consideration of representations and the preparation of focused changes and minor modifications.

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'.

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. The 'Duty to Cooperate'

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.

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.'*

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.

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

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
- Oxfordshire Skills Board
- Harwell/Diamond Light Source
- LEP Business Representative
- LEP Oxford City Business Representative
- Homes and Communities Agency
- Environment Agency

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

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

Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) 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 (now the Homes 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

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

3. Previous consultation

In January 2016, the Council published a consultation paper which highlighted issues that needed to be considered in undertaking a Partial Review of the Local Plan. The Issues Paper invited comments

and discussion of the issues was encouraged; a 'call for sites' was also made. A Statement of Consultation which summarised the issues raised during the consultation was published alongside the November 2016 Options Paper. This forms Part One of this document.

On 14 November 2016 the Council published an Options Paper for consultation. The Paper was prepared to engage with local communities, partners and stakeholders in developing options on how to meet Oxford's housing needs when preparing a Partial Review of the adopted Cherwell Local Plan Part 1. A Statement of Consultation which summarised the comments and issues raised during the consultation was published alongside the July 2017 Proposed Submission Plan. This forms Part Two of this document.

4. Consultation & Engagement

Consultation arrangements

On 17 July 2017 the Council published its Proposed Submission Plan for consultation. This Partial Review plan provides a vision, objectives and specific policies for delivering additional development to help meet Oxford's housing needs. Copies of the Public notices are attached at Appendix 1

How did we consult?

The formal consultation was initially advertised to run for six weeks from 17 July 2017 – 29 August 2017. Subsequently the consultation period was extended to 5pm on 10 October 2017. This extension was to allow more time for comments to be received due to the level of public interest in the proposals.

Distribution

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 invited to make representations on the submitted plan.

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, Old Marston Library and Summertown Library) and West Oxfordshire (West Oxfordshire DC offices, Woodstock Library and Woodstock Town Hall). A consultation summary leaflet and poster were also produced and were made available at these locations as well as on the Council's website.

The consultation arrangements were discussed in advance with officers from Oxford City Council and West Oxfordshire District Council and consultation material provided for them to distribute as they preferred. Publicity material was also provided to the administrators of relevant Oxford Community Notice Boards.

Press Coverage

The statutory public notices were placed in the following newspapers on 13 July 2017:

Bicester Advertiser

Oxford Times

Oxford Mail

Witney Gazette

The notices were again advertised on 10 August 2017 to publicise the extension of the consultation period to 10 October 2017.

Social Media

Press releases regarding the consultation were published on the Council's Facebook and Twitter pages. The press releases explained the purpose of the Proposed Submission Plan and provided details of the consultation including exhibition dates and locations where the documents were available to view.

Public Exhibitions

Staffed public exhibitions were held during July and August 2017 at the following locations:

- Shipton on Cherwell Village Hall, Shipton on Cherwell on Wednesday 19 July 2017 from 4.00pm to 8.00pm.
- Yarnton Village Hall, The Paddocks, Yarnton on Friday 21 July 2017 from 4.00pm to 8.00pm.
- Woodstock Community Centre, 32 New Road, Woodstock on Thursday 27 July 2017 from 4.00pm to 8.00pm.
- Cutteslowe Pavilion, Cutteslowe Park, Oxford on Tuesday 1 August 2017 from 3.30pm to 7.30pm.
- Begbroke Village Hall, 3 Begbroke Lane, Begbroke, Kidlington on Wednesday 2 August 2017 from 4.00pm to 8.00pm.
- Exeter Hall, Oxford Road, Kidlington on Thursday 17 August 2017 from 4.00pm to 8.00pm.

5. Consultation with Statutory and Non-Statutory Bodies

Oxfordshire Growth Board

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.

Officers from all Oxfordshire Authorities met on 17 May 2013 to discuss how the results of the SHMA should be considered, incorporated in to 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 avoid unnecessary delay to Local Plan preparation.

In April 2014 the Oxfordshire Local Authorities published the SHMA for Oxfordshire. The document suggested that the demographic trends and growth of the County economy and the level of affordable housing need required would necessitate 100,060 additional new homes in Oxfordshire between 2011 and 2031.

In November 2014, the Oxfordshire Growth Board, a Joint Committee which, on behalf of 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. This programme of work would help the Local Planning Authorities meet the Duty to Co-operate whilst protecting the 'sovereignty' of individual councils over their Local Plans.

A Project Team was established to progress 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. This Project Team met regularly to consider the implications of the SHMA and how best to meet the identified unmet housing need of Oxford. This is in the context of recognising that the administrative boundaries of the City of Oxford are constrained and consequently it is seeking effective ways to address this issue in line with the Duty to Cooperate. 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.

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 to assess the extent to which the land within the Oxford Green Belt performs against the purposes of Green Belts
- Oxford Spatial Options Assessment to help inform the apportionment or distribution of unmet housing need to the district and city councils.
- High Level Transport Assessment of Spatial Options
- Education Assessment of Spatial Options.

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. This programme of work and the Growth Board's decision has informed the preparation of the Partial Review of the Cherwell Local Plan.

All six Councils have continued to meet on matters associated with the Partial Review including a Countywide Infrastructure Assessment (OXIS) and preparations for a statutory Joint Spatial Plan for Oxfordshire.

Other Meetings/Discussions with Statutory and Non-statutory Bodies

Aylesbury Vale District Council	11 October,2017	Aylesbury Offices
Buckinghamshire County Council	Declined offer of a meeting. Representation raised no issues.	
Highways England	13 September, 2017; 9 October, 2017	Bodicote House
Historic England	6 September 2017	Bodicote House
Natural England	15 September, 2017 2 November, 2017	Bodicote House Oxford
Northamptonshire County Council (West Northamptonshire JPU)	18 September, 2017	Telecon
Oxford City Council	15 September, 2017	Oxford City Offices
Oxfordshire County Council	15 August, 2017 12 September, 2017	Bodicote House Bodicote House
South Northamptonshire Council	Monday 9 October, 2017	SNC
South Oxfordshire District Council	Thursday 3 August, 2017	Bodicote House
Stratford-on-Avon District Council	12 September 2017	Stratford Offices
The Civil Aviation Authority	Meeting request sent and contact made. No response received.	
The Environment Agency	Declined offer to meet. Representation received.	
The Homes and Communities Agency	26 September 2017	Bodicote House
NHS Oxfordshire CCG NE + The Key and Gosford Medical Practices	12 September 2017	Bodicote House
The Office of Rail Regulation	Meeting request sent and contact made. No response received.	
The Oxfordshire Local Enterprise Partnership	17 August 2017	OXLEP, Oxford
The Oxfordshire Local Nature Partnership (BBOWT, Forestry Commission, Wild Oxfordshire)	5 October,2017	Bodicote House
The South East Midlands Local Enterprise Partnership	29 November 2017 and 2 February 2018	SEMLEP offices

Vale of White Horse District Council	18 September 2017 27 September, 2017	VoWH Offices
Warwickshire County Council	Declined offer of a meeting. 30/10/17 email raised no issues.	
West Oxfordshire District Council	22 September, 2017	West Oxfordshire Offices

Town and Parish Councils & Other Local Groups

There have been a number of meetings with local parish councils including:

- **1 August 2017 – Gosford and Water Eaton PC**
Presentation and discussions with Parish Council
- **21 September 2017 – Kidlington PC public meeting**
Officer and member attendance at the public meeting.
- **9 June 2017 – Kidlington Voice**
An officer presentation on the Partial Review Plan.

6. Sustainability Appraisal

The Sustainability Appraisal which accompanies the Submission Partial Review Local Plan summarises the representations made to the June 2017 Sustainability Appraisal.

7. Representations – Summary of Issues Raised and Officer Response

Representations Received

A total of 1460 representations were received which generated a total of approximately 6000 comments. A table providing a full summary of each representation is attached at Appendix 6.

This section sets out a brief summary of the representations received. It does not offer a commentary on those representations. It has been prepared to provide an overview of the complex range of positions and views made by respondents. Full copies of each representation can be viewed online at <https://www.cherwell.gov.uk/info/112/evidence-base/369/local-plan-part-1-partial-review---evidence-base> (evidence doc. PR78).

Each section/policy provides an indication of the specific representations received. However, it should be noted that the vast majority of representations were general in nature. These representations are summarised under the ‘general’ heading of the summaries below.

Overview

The majority of representations received made comments without following the standard representation form. The vast majority of the representations raised objections to the Plan.

Over 550 'Post card' type representations were received with the following comments:

*'I object to Policy PR1(a) to build 4,400 houses in this area for Oxford overspill. 4,400 houses is not a **justified or proven requirement. It is unsustainable.** Oxford should do more to meet its own needs.*

*I object to Policy PR3 to remove land from the Oxford Green Belt. The Green Belt preserves open spaces that are much appreciated by local residents, protects both the historic city of Oxford from overdevelopment and neighbouring villages from coalescence. Government guidance says that Green Belt is a permanent designation and that unmet housing need is not a reason for building in the Green Belt. The plan is therefore **not consistent with National Policy.***

*I object to Policy PR11 on infrastructure because it is **unsound.** No costs are shown in the schedule. In most cases no source of funding is identified. There is no indication of how the already congested highway network will cope with the additional vehicles from these new houses and the other developments planned for the wider area.*

***Unreasonable consultation process.** I object to the complexity of the consultation and its timing over the school summer holidays. The Council has not given members of the public a fair opportunity to read and understand the proposals and make their views known.*

*For all these reasons I consider the proposed submission plan is:
Unsound Not Positively Prepared Not Justified and Not effective'*

There was also a space on the postcard for individuals to make their own additional comments.

Summary of Main Issues

A summary of the main issues raised on specific sections and policies are set out below.

Section 1 – Working in Partnership to Meet Oxford's Needs

There were approximately 50 comments relating specifically to this section of the Plan, with most raising objections. These included representations from the following:

Begbroke PC - Whilst there is a need for affordable housing in Oxford the figures are exaggerated. The idea that the housing will be for local residents is misleading as current legislation does not prevent new housing going to outsiders. Affordable housing will not be affordable for the lower paid as it only means an 80% discount. Oxford should do more to meet its own needs. It should be more innovative so as to obtain greater densities. They should use CPO powers; they should not be encouraging more business activity when it does not have the ability to house more people. There are identifiable sites in Oxford that could be built on. There are huge costs involved in improving the transport infrastructure and development will only exacerbate existing problems. We do not see how this can be funded and where the money will come from. The diversion of traffic through Kidlington will only make matters worse. Do not see the exceptional argument for building in the GB especially when people currently commute from Banbury and Bicester and elsewhere in Oxfordshire to work in Oxford. A better way to help communities, rather than building in Green Belt is to have a more structured transport policy that supports all communities rather than the selected few. Our vision is to retain what we have. This is not a joined up sustainable vision for North Oxford. It is the destruction of three villages being incorporated in to North Oxford with irrevocable loss of Green Belt. It is the creation of urban sprawl. We currently have access to the countryside and wide open areas. Not just the proposed narrow areas of green. Can be cynical and believe that Cherwell's interest has been to collect the additional revenue it will get by building these houses. Oxford's requirements are based on old data and before the implications of the EU referendum and the latest new government figures projecting future housing need for England. We do not believe this review is about unmet housing need but more about the University expanding its site, developing its land in our villages and Pear Tree and profiteering at the expense of the GB. CDC may gain from a substantial New Homes Bonus Grant. Oxford City has ignored many smaller sites. Other sites in the County such as at Bicester and Arcott have massive housing potential. They should pursue sites at Marston in the GB.

Bloxham PC - CDC has demonstrated that there are exceptional circumstances that necessitate the release of GB land close to Oxford to meet the City's identified need. It is appreciated that this small release of GB will be unpopular, however, if Oxford is unable to meet its need within its boundaries then this release seems to be the best alternative. Whilst recognising that CDC has a duty to cooperate with the City, it believes that the total required of the surrounding districts is extremely high. It has been suggested that this figure could be reduced if the new Government methodology is used. Concerned about SODC's refusal to accept its allocation.

Begbroke & Yarnton Green Belt Campaign - The twelve circumstances given in paragraph 5.17 are not exceptional and are no more than general planning concepts. The rationale behind the housing target figures is flawed. Given the recent publication of a draft uniform methodology for calculating housing need and the forthcoming publication of Oxford's own housing figures, it is premature for the Council to press ahead with the allocation plans. The requirement in paragraph B.95 of the Local Plan that a partial review of the Local Plan be completed within two years of adoption is predicated on joint working assessing the additional need for Oxford, which has not been finished. The Inspector only recommended in the Non-Technical Summary a joint review of the Green Belt boundaries once Oxford's specific needs were defined, which has not yet happened. The Council's obligation derives only from the agreement of the Growth Board in September 2016 to share the putative unmet housing need. There is no policy trigger, either local or national, which is compelling the Council to pursue the allocation of 4,400 additional units on Green Belt land, in addition to its

own local needs. Land use decisions on Green Belt boundaries should not be dictated by decisions made by bodies outside of the planning process. The exceptional circumstances test must be applied to every Green Belt parcel, to minimise harm to the Green Belt. The Plan is based on insufficient evidence base to justify the extent and location of Green Belt release proposed; there has been insufficient consultation at Regulation 18 and linked to this, insufficient consideration given to reasonable alternatives. There was no attempt to refine broad areas of search, or to examine mutually exclusive alternative packages of site options where each package would provide for a quantum of Oxford's unmet needs.

Other comments on this section included:

- Oxford's unmet housing need is substantially overstated.
- Oxford has not satisfactorily identified the amount of housing they might not be able to meet.
- Housing targets are based on exaggerated, discredited figures.
- The DCLG document 'Planning for the Right Homes in the Right Places' indicates that far fewer houses are required in Oxford.
- Oxford cannot meet its own needs due to deliberate decisions by the City Council not to address the problem and exacerbating it by promoting more industry and growth.
- Oxford City has not yet identified its own housing needs to 2036.
- Based on dubious figures proffered by the SHMA and the Oxfordshire Growth Board.
- The Oxfordshire Growth Board is only concerned with driving economic growth.
- The Plan attacks the core on which Green Belt depends.
- It is wholly inconsistent with national Green Belt policy.
- It will destroy the Kidlington Gap.
- The notion that building on Green Belt will provide opportunities to improve the quality and quantity of new public open space and green infrastructure, access to the countryside and, the provision of additional facilities is not credible.
- Development should be located on sustainable sites elsewhere in the District.
- The Council should set much higher density targets.
- Unlikely that a new railway station at Begbroke will be deliverable.
- Plans for additional housing in North Oxford/South Kidlington should be delayed until the Oxford-Cambridge Expressway route is settled, the E-W railway is re-opened and the full extent of the expansion of Bicester is agreed with its possible new transport infrastructure.
- New high-tech employment sites should be focused at Bicester where large numbers of houses are being built.
- Planned housing at Woodstock will put undue stress on local infrastructure and services, threaten the WHS, damage the rural environment and risk turning this historic town in to an Oxford suburb.
- The Plan will create more demand from London commuters.
- Plan raises serious concerns about the provision of public facilities and resources. Eg lack of provision of secondary schools, health.
- It will destroy existing rural resources and wildlife.
- Increased traffic will result in a further deterioration in the already poor air quality in Oxford.

- There is no consideration of the Kidlington Masterplan which serves to preserve the separate identity of Kidlington.
- The scale of development at Kidlington cannot be accommodated.
- It is premature to make decisions on Cherwell's Partial Review.
- The University's sports facilities are underused. Some could be released for housing within the City boundaries.
- The Plan does not take in to consideration the substantial building plan already underway for Cherwell and the impact this is already having on the local area in terms of increased traffic trying to access the area.
- The Council's exceptional circumstances for building in the Green Belt are unjustified.
- Kidlington, Yarnton and Begbroke would merge and lose their individual identities.
- The exceptional circumstances test must be applied to every Green belt parcel to minimise harm to the Green Belt.
- The Plan is based on an insufficient evidence base to justify the extent and location of the Green Belt release proposed.
- There has been insufficient consultation at the Regulation 18 stage.
- Insufficient consideration has been given to reasonable alternatives.
- The Council is not able to demonstrate that the evidence base was in place well in time to inform consideration of options/formulation of the preferred strategy.
- Oxford's unmet need can only be accurately assessed when the City completes its local plan.
- A number raise the issue of SODC not agreeing to the OGB's apportionment for South Oxfordshire. They consider that these homes should be accommodated elsewhere in the County and argue that there may therefore be a need to amend the Plan to allocate additional sites.
- CDC should not view the development strategy to meet its own and Oxford City's unmet needs as separate. A comprehensive approach should build on the existing vision set out in the adopted local plan which seeks to focus growth in and around Bicester and Banbury.
- Question whether CDC has demonstrated exceptional circumstances for revising Green Belt boundaries. There is no evidence that a comprehensive comparative assessment of alternatives has been undertaken.

Officer Response

Officers consider that there is a need to plan for more houses to meet Oxford's unmet housing need. The adopted Cherwell Local Plan includes a formal commitment to work on an on-going basis with the other Oxfordshire councils under the statutory 'duty to cooperate' (para B.95). The Government appointed Planning Inspector who examined the Plan stated, '*...It is ...essential for clarity and soundness that the Council's firm commitment to help meet the needs of Oxford city as part of the countywide housing market area, jointly with other relevant authorities including through the Oxfordshire Growth Board, as well as in respect of the Oxford and Oxfordshire City Deal (2014), is formally recorded in the plan...*' (Inspector's Report, para. 62, evidence doc. PR45).

His Non-Technical Summary records: '*Add a formal commitment from the Council, together with other relevant 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' (Inspector's Report, p.3)

The Oxfordshire councils accept that Oxford cannot fully meet its own housing needs. They collectively committed to consider the extent of Oxford's unmet need and how that need might be sustainably distributed between the districts. The housing capacity of Oxford has been tested by the Oxfordshire Growth Board.

SECTION 2 – Preparing the Plan

There were approximately 20 comments raised in relation to this section of the Plan. These included representations from the following:

Bloxham PC – Firmly believe that meeting Oxford's needs should not compromise the existing strategy in the adopted Cherwell Local Plan.

Hampton Gay and Poyle PM - Oxford City suffers from an extremely poor transport infrastructure when it comes to ease of access for commuters travelling to their place of work within the city. It always has been the case and by building homes to satisfy the City's shortage remotely/outside of its boundaries will only compound the current and foreseeable travel situation. It appears that Cherwell has 'cherry picked' areas, the A to I list, that could be considered for housing development and then rejected them as a way of saying that deep analysis has been completed to arrive at their conclusion and subsequently remove the areas C through I . These areas should never have been selected for consideration. Cherwell's premise of building the additional homes in a dispersed manner will have a huge effect on existing mature villages and exacerbate the already poor travel infrastructure to Oxford City. It must not be forgotten, it is the City that has a housing shortage especially for its 'key' workers and that for efficiency and cost, homes for these essential workers must be provided in close proximity to their place of work. - An Oxfordshire wide joined up strategy is clearly missing between housing requirements for key City workers and travel infrastructure systems. - To re-emphasize, Housing for 'key' workers supporting Oxford City's human resource requirements MUST be in close proximity to their place of work.

Oxford City Council – Supports the overall spatial strategy, vision and the new spatial objectives as they specifically and positively respond to the issue of meeting Oxford's unmet need. It recognises that the strategy needed to be different to that of meeting the wider district needs. The strategy reflects how important it is for the sites to have a good spatial relationship to Oxford and incorporates essential planning principles which align with those identified and agreed in the joint studies undertaken under the Oxfordshire Growth Board.

Aylesbury Vale DC – Considers the Plan to be sound and that the Duty to Cooperate has been met with regard to cross-boundary issues relating to Aylesbury Vale and Cherwell.

Oxford Green Belt Network – Plan is founded on the assumption of a step change to historic levels of growth in Oxfordshire. It suggests that the long established strategy of diverting growth away from Oxford towards the county towns is no longer feasible. The proposed levels of growth are unrealistic. Arguments for a strategy to divert growth away from Oxford remain as strong as ever. For this strategy to work the Green Belt should be retained in its entirety. The Review cannot be effective without a well-founded spatial strategy for the county.

Other comments include:

- Insufficient certainty that affordable housing will be delivered.
- Oxford's housing need should be met close to the city with better transport connections.
- The preferred locations around Kidlington will increase congestion, result in loss of Green Belt and lead to coalescence between Kidlington, Begbroke and Yarnton.
- The identification of reasonable alternatives should have commenced with a review of settlements with good socio-economic and transport links to Oxford.
- In accordance with the Council's adopted settlement hierarchy development should be directed towards Bicester and Banbury as the top tier settlements and all sites within these should be exhausted before considering development at second-tier settlements which include Kidlington.
- Growth at Bicester has not been rigorously tested.

Officer Response

Officers consider that all reasonable options have been considered. The housing capacity of Oxford has been tested by the Oxfordshire Growth Board. The Council has tested Areas of Search covering the entire district to determine which Areas were not suitable for accommodating Oxford's unmet housing needs and which could deliver the Plan's vision and objectives. Within those Areas identified, all reasonable site options were examined. The consideration of alternatives was informed by evidence, consultation feedback and sustainability appraisal

SECTION 3: Setting the Scene

Approximately 10 comments were made specifically relating to this section. These included representations from the following:

Gosford and Water Eaton PC – It should not be considered a given that Cherwell should provide 4,400 new homes. Of this figure 1410 is proposed in the Parish. This will lead to a 208% increase in the number of houses in the Parish. This is a substantial figure which needs to be fully tested in terms of its impact on the Parish and its residents. The PC believes that housing need should be based on up to date economic forecasting. Brexit has already seen a down turn in EU research funding and a decline in the level of recruitment by the University. An independent review of the economic forecasting should be undertaken which takes these factors into account, as they could affect future housing needs.

Hampton Gay and Poyle PM - 1. The 4,400 homes is completely out of proportion in terms of the existing housing stock/numbers of Kidlington and Gosford, Begbroke and Yarnton. The villages will be swamped and lose the village characteristics that has been developed over many years. 2. The current travel infrastructure from this area to Oxford City is completely inadequate with lengthy rush hour commute times to get to a city desk, hospital or university, etc. place of work. Adding additional housing stock with their associated transport medium to the existing chaotic road network will cause gridlock. 3. Oxford City Council's, 'Oxford needs a gear change to tackle congestion' released last Wednesday 27th Sept. is late into the discussion arena and should have been released/discussed months ago. This is completely unacceptable and bad practise to release an initiative so close to the Cherwell deadline of 10th Oct. 4. Instead of building homes including

schools, GP practices, transport systems in areas A and B, focus must be reapplied to the City area and how to maximise the use of brown and greenfield sites. 5. Oxford City must stop providing additional sites for businesses if it cannot provide enough space for the associated housing requirements. 6. Oxford Parkway, a superb link into London Marylebone, will become a London Commuter station with many of the Cherwell planned developments for Oxford key workers being swamped by workers from the capital with greater spending power/salaries grabbing the local area A and B properties. In the Cherwell Local Plan of July 2017, it is stated on page 12 that this is "a coherent and joined-up plan." COMPLETELY DISAGREE, this plan is anything but a coherent strategy and requires urgent reassessment. All of Oxford's six councils, not just from a Cherwell D.C. perspective, MUST sit down and discuss a way forward to resolve this housing and its associated transport issues as a matter of some urgency. This Cherwell Local Plan will NOT work as it stands

Oxford Green Belt Network – Plan is founded on the assumption of a step change to historic levels of growth in Oxfordshire. It suggests that the long established strategy of diverting growth away from Oxford towards the county towns is no longer feasible. The proposed levels of growth are unrealistic. Arguments for a strategy to divert growth away from Oxford remain as strong as ever. For this strategy to work the Green Belt should be retained in its entirety. The Review cannot be effective without a well-founded spatial strategy for the county.

Other comments include:

- The Plan advocates a challenging strategy and much rests on the deliverability of the locations identified to meet the unmet needs of Oxford. If needs fail to be met then land at Upper Heyford could play a significant role.
- The Plan is predicated on provision of 4,400 houses being needed. This assumption has recently been challenged and is likely to be revised downward significantly.
- Growth should be focussed at Bicester and Banbury in accordance with the Council's settlement hierarchy and spatial strategy.
- The Council has not demonstrated exceptional circumstances to release sites from the Green Belt.
- There is insufficient evidence to suggest that opportunities to increase capacity at existing allocated housing sites have been robustly tested.
- There should be a single housing requirement for the Plan.
- The inability of Oxford to accommodate its spatial planning needs is not just confined to housing. Land to meet economic development needs also has to be addressed by the surrounding districts. The Plan should make provision for large scale logistics operators.

Officer Response

The Oxfordshire Strategic Housing Market Assessment 2014 was produced jointly by all the Oxfordshire councils in accordance with Government guidance and has been scrutinised through the examinations of the Cherwell, Vale of White Horse and (currently) West Oxfordshire Local Plans. It provides a clear understanding of housing needs and remains the most up-to-date, cooperatively produced and robust assessment.

As highlighted in representations, the Government, in September 2017 published a consultation document entitled 'Planning for the right homes in the right places' in which a proposed new methodology for assessing housing need was highlighted.

The basic methodology suggested a simplified method involving three components: a demographic baseline, a modification to account for market signals (the price of homes) and a cap to limit any increase an authority may face when they review their plan. 'Indicative' figures accompanied the consultation to demonstrate what the effect of the methodology could be under the circumstances at that time. These suggested that Oxford's basic needs would be 746 dwellings per annum (2016-2026) and that Cherwell's would be 762 per annum (2016-2026) compared to the need identified in the 2014 SHMA of 1400 per annum (2011-2031) for Oxford (mid-point) and 1,142 per annum (2011-2031) for Cherwell. However, the consultation paper included the following paragraph:

'46. Plan makers may put forward proposals that lead to a local housing need above that given by our proposed approach. This could be as a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy. We want to make sure that we give proper support to those ambitious authorities who want to deliver more homes. To facilitate this we propose to amend planning guidance so that where a plan is based on an assessment of local housing need in excess of that which the standard method would provide, Planning Inspectors are advised to work on the assumption that the approach adopted is sound unless there are compelling reasons to indicate otherwise. We will also look to use the Housing Infrastructure Fund to support local planning authorities to step up their plans for growth, releasing more land for housing and getting homes built at pace and scale'

Within the consultation paper were proposed transitional arrangements depending on the stage reached in preparing a Plan. It was suggested that if plan was submitted for examination on or before 31 March 2018 or before the revised NPPF was published (whichever was later), authorities should continue with the current plan preparation. Otherwise, it was suggested that the new standardised method would apply.

The consultation paper stated:

'52. We are also proposing transitional arrangements to set a period of time before which plans would be expected to use the standard method for calculating the local housing need. This recognises that a number of plan makers have already made significant steps in preparing their plan, and we want to encourage them to complete their plan, avoiding further delays and so undermining the delivery of new homes.'

The consultation paper was very clear in its support for authorities seeking to provide more homes than might be required by the draft methodology provided there is a more than the draft figures given in the consultation document, provided there are evidence-based and sound planning reasons for doing so. It was similarly clear that Local Planning Authorities should not hold-up their planning making.

Further consultation of changes to Government policy are expected. On 30 January 2018, the Government's Chief Planning Officer advised,

'NPPF timetable update

We are currently revising the NPPF in order to implement our planning reform package from the housing White Paper, the Planning for the right homes in the right places consultation and the announcements at Autumn Budget. We intend to publish a draft revised NPPF before Easter. We will consult on both new policies from the Budget, and the text of the Framework, to make sure the wording is clear, consistent and well-understood. Our ambition is to publish a final revised Framework in the summer.'

Local Housing Need transitional arrangements

In our Planning for the right homes in the right places consultation in September we set out that the new standardised method should be used, unless the plan will be submitted for examination on or before 31 March 2018, or before the revised Framework is published (whichever is later). In light of the timetable set out above these transitional arrangements will apply to any plans submitted before the final revised Framework is published.'

In view of the fact that the final, revised NPPF will not be published until the summer (an 'ambition'); that the Council had committed to a two-year review programme for the Partial Review beginning in 2015; that there is agreement among all Oxfordshire councils that Oxford cannot fully meet its own housing needs; and, that all Oxfordshire Councils have committed to Plan for and support the delivery of 100,000 new homes between 2011 and 2031 in the Outline Agreement for the Oxfordshire Growth Deal (by reference to the SHMA 2014 at para. 24), it is not considered that the plan-making process be paused.

It might be considered that a risk for the Council would be for the objectively assessed need to fall significantly later in 2018 and for individual local planning authorities within Oxfordshire to start re-appraising Oxford's level of unmet need and its apportionment. This risk cannot be eliminated but is reduced by the following circumstances:

- the need for additional homes, including affordable homes, and the growth of the Oxfordshire economy will remain as key planning considerations;
- the outline agreement for the Oxfordshire Growth Deal (Appendix 11);
- the expected commitments from West Oxfordshire and Vale of White Horse District Councils in their new Local Plans to fulfil their apportioned housing figures;
- the existing and expected commitments from Vale of White Horse District Council in its existing and new Local Plan to fulfil its apportioned housing figure;
- the commitment between all of the Oxfordshire Councils to the production of a new Joint Spatial Plan and the alignment to that Plan in the commitment to deliver 100,000 homes by 2031 in the Growth Deal Outline Agreement.

Section 4 – Our Vision and Objectives

There were approximately 40 comments relating to this section of the Plan. The majority raised objections to the Plan. The comments included representations from the following:

Gosford & Water Eaton PC – The draft vision gives insufficient consideration to the impact of the proposals on existing communities and the environment. In our community local services are already under strain, and cannot just deliver extra capacity for more residents. It should recognise that meeting Oxford's needs must take account of the impact on the environment and local communities including safeguarding the countryside from encroachment; loss of access to the open countryside for the urban population; removing an established historic leisure facility; removing valuable agricultural land and adding to the parking problems and travel congestion, rather than providing sustainable travel opportunities for the existing and new villagers.

Begbroke PC – Is it vested interests that have shaped this vision? The many objections to the Plan have been ignored by CDC. No confidence that the Council will take any notice of opposition views. The Government is introducing new projections for housing for England. Under these calculations the number of houses Oxford claims it needs falls by over 40%. The Plan should be withdrawn. The Oxford Transport Strategy acknowledges that future housing and employment growth is set to further exacerbate congestion on the A34, the outer Ring Road and other corridors that feed in to the city, unless traffic can be captured before it reaches them. The infirm and shoppers will not be cycling. Catching a bus is not realistic for many people.

Hampton Gay and Poyle PM - We do not support the vision contained within the plan document:

- as it sacrifices local communities and their Green Belt to accommodate the needs of Oxford city, without concern for the wishes of those communities
- by definition the development is to provide commuting homes for Oxford, no consideration is given to how that creates balance and sustainable communities in the villages affected
- we do not accept that development of this scale can be sympathetic to the historic context of the villages or their environment
- clearly development of this scale needs strong connections and transport infrastructure if it is to serve Oxford Commuters but that assumes the basic vision that the village should be sacrificed to help Oxford is accepted which it is not. Also the document does not give enough detail or commitment to developing already overwhelmed transport systems to accommodate this flawed vision
- we accept that development should be well connected to Oxford, if it is to serve the city, but do not accept that proximity is the only factor. Accordingly, investment in transport infrastructure can serve more outlying communities as well as those in the Kidlington/Yarnton/Begbroke area
- we do not believe the vision explains how social/affordable housing for lower paid, key workers for Oxford city will be delivered and reserved for those workers
- we envisage development of this scale will result in unforeseen transport consequences for our Parish, with increased 'rat running' in both directions through Hampton Poyle, worsening an existing congestion/speeding issue. We cannot therefore see how this adds to our Health and Well being

Historic England – welcomes the inclusion of ‘historic environment’ in SO15 as part of the positive strategy for conserving and enjoying the historic environment.

West Oxfordshire DC state that the Vision is an appropriate vision in principle and sets out a range of important factors. The Strategic Objectives rightly recognise the need for Cherwell to work in partnership with other authorities in delivering Oxford’s unmet housing needs. They also recognise the need for transport improvements.

Oxfordshire County Council – The Vision and objectives are supported. The spatial strategy which focuses development on land in North Oxford, Kidlington and along the A44 corridor is fully supported. A number of these locations were identified as potential strategic spatial options for Oxford’s unmet needs and assessed through the Growth Board post SHMA strategic work programme, the outcome of which underpins the Growth Board apportionment of unmet need.

Highways England – welcomes the wider local plan objectives which focus on locating development in sustainable locations in the District and in close proximity to facilities and services, including public transport options. Welcome the commitment to a collaborative approach between the county and district councils in facilitating improvements for sustainable transport to access Oxford. We also wish to be part of this collaborative approach.

Kidlington Development Watch - Considers that the growth and the level of housing need are much lower than estimated. They rely on assumptions of high growth in jobs in Oxfordshire requiring many people to move into the county. These projections of jobs growth are exaggerated in order to support funding bids from the Local Enterprise Partnership. Some growth will of course occur. However much of this can continue to be directed away from the City as under the ‘country towns’ approach which has operated in the past. Indeed, through true co-operation between the Oxfordshire Councils, such an alternative strategy would help to protect the city from over development, would be consistent with the fundamental purpose of the Green Belt, and would be sustainable. In contrast, the expansion of Oxford is unsustainable.

Other comments include:

- Objection to SO17 because the economic growth projections and the 2014 SHMA are obsolete.
- Objection to SO18 as there are no mechanisms to ensure affordability or that the new accommodation will not overwhelmingly be taken by newcomers.
- Objection to SO19 as the infrastructure proposals are merely unjustified and uncostered ideas.
- Oxford’s unmet need is unproven
- It would be better to build nearer to places of employment rather than creating satellite settlements and produce more congestion with people having to commute
- Oxford City must have plenty of sites that can cater for their housing requirements.
- SO16-SO19 are in direct contradiction to the 2015 adopted local plan.
- The Consortium broadly supports the vision and objectives of the Partial Review.
- How can Cherwell agree to an unidentified need until that ‘housing need’ is proven by an EiP for the Oxford Plan.
- Important to provide an appropriate evidence base to justify the level of Oxford’s unmet housing needs.

- The 4,400 figure can only be treated as a minimum to ensure the soundness of the plan.
- The SHMA relies on assumptions of high growth in jobs in Oxfordshire.
- The option of trying to force 40% population increase in a largely rural county has not been discussed with the electorate.
- Cherwell has failed to work with the City Council on strategic employment site planning. There is no joined up thinking on how many knowledge –based or technology/science parks are needed.
- Creating extra jobs will increase housing demand without tackling the local need for more affordable housing.
- Cherwell’s priority should be for the needs of its local communities.
- The Tripartite welcomes and supports the Council’s strategic objectives and spatial planning development approach to meeting Oxford’s unmet housing needs.
- The expansion of Oxford is unsustainable. The more it expands the greater damage to the historic city and the greater the loss of Green Belt which protects it.
- Kidlington is now faced with the worst of all outcomes ie massive structural loss of the Green Belt combined with huge housing schemes that are disconnected from Kidlington and offering nothing for the village in terms of place making and regeneration.

Officer Response

Officers have considered the proposed vision and plan objectives in light of the representations made. No change is recommended. The goals of meeting housing needs; supporting the city’s economy, universities and its local employment base; and ensuring that people have convenient, affordable and sustainable travel opportunities to the city’s places of work, study and recreation, and to its services and facilities are essential to delivering a Plan that truly relates to Oxford’s need. The vision’s aims are central to achieving sustainable development.

Section 5 – Delivering the Vision and Meeting Our Objectives

Housing Mix, Tenure and Size

Over 30 comments were made on this section. These include representations from the following:

Bloxham PC – Oxford’s greatest need is for affordable housing for key workers, people new to the housing market and people working in Oxford’s developing science economy. Such housing must have easy access to affordable and sustainable transport options which development close to Oxford would allow. The policy to allocate 50% affordable housing is noted.

Begbroke PC – Councils should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies.

Oxfordshire County Council – The significant need for affordable housing is the driver behind the scale of Oxford’s OAN as identified in the SHMA. The Plan seeks to meet the need for key worker housing as both the affordable and market housing mix. The City’s definition of key worker housing currently focuses mainly on meeting the needs of those in professional roles. The needs of other key workers in lower paid roles should also be included.

Oxford City Council – Welcomes the target for 50% affordable housing. The City Council's priority for addressing the needs of those on the housing register would be for social rent homes. Supports that 'key worker' housing may be delivered as part of the intermediate affordable housing. The City Council is proposing to take a new approach with the preferred option being an alignment more with income and affordability rather than specific employers or sectors.

Begbroke & Yarnton Green Belt Campaign - The quantum of homes is based on the SHMA 2014 which is now out of date. Publication of a draft standardised methodology for assessing housing needs published in September 2017 indicates a figure 61% lower for Oxford and 50% lower for Cherwell. The Proposed Submission Plan could lead to an oversupply of housing. With this question mark over the OAHN figure Green Belt release cannot be justified. Oxford's housing need is still to be fully and accurately defined through its local plan process. The Inspector's recommendations on the Local Plan envisaged a continuing joint approach whereas Cherwell has forged on alone and sought to defend the Growth Board apportionment. This figure was arrived at on the basis of a rudimentary process of examining sites in isolation through the LUC Spatial Assessment. There is little evidence of other work streams influencing the RAG rating of sites. The figure was not arrived at following SA or HRA work, or any consultation. The Council has not acknowledged the uncertainty associated with the apportionment figure.

Other comments include:

- Number of houses required has been grossly overestimated.
- Vacant properties should be used.
- How many of the new homes will actually be affordable?
- Developers consistently default on their affordable housing quota.
- Most new houses are likely to serve London commuters and buy to let markets.
- Oxford City has consistently failed to develop land for meeting its housing needs.
- SHMA estimates are unjustified.
- Housing figures should be revisited due to publication of Government's consultation document 'Planning for the Right Homes in the Right Places'. It reduces Oxford's needs by 47%.
- Housing densities too high.
- Housing densities too low.
- There is a net need for affordable housing which is not the same thing as a net need for new construction.
- Housing plans for North Oxford will virtually join Oxford with Kidlington. It will become part of Oxford's urban sprawl and lose its unique village identity.
- Strain on infrastructure a concern.
- Support for 50% affordable housing. It is hoped that it can effectively be enforced.
- Need for housing that local people can afford to buy or rent. The intention to build at low densities in desirable locations will not deliver this type of housing.

Officer Response

The many comments on this topic have been noted.

Securing the delivery of affordable housing is critical in helping to meet Oxford's housing needs in the context of the 2014 SHMA and Oxford's Housing Strategy. Officers from the CDC and the City council have been in discussion with a view to agreeing an outline approach for the cross border allocation of housing. The discussions have been broadened out in the context of other Oxfordshire local plans seeking to address Oxford's needs and cooperative work on the Oxfordshire Growth Deal which includes the delivery of affordable homes.

Officers consider that the Plan's approach to tailor the overall need for affordable housing to Oxford's needs to be required and deliverable in the context of evidence including the Plan's viability assessment (evidence doc. PR49). Agreement between the two councils as housing authorities will help ensure timely delivery. The concerns raised in representations about the wider 'affordability' of market housing and the risk that it is not readily available to those working within Oxford go beyond spatial planning issues, but the provision of additional housing would assist movement within the market and officers consider that Policy PR2 - Housing Mix, Tenure and Size would help tailor the new housing to local needs.

In the interest of consistency a proposed focused change includes the addition of the proposed 50% affordable housing requirement to Policy 12b: Sites Not Allocated in the Partial Review.

The Oxford Green Belt

Approximately 20 comments were made on this section. These included representations from the following:

Oxfordshire County Council – Agree that there are exceptional circumstances for removing land from the Green Belt, including the urgent need to provide homes to meet Oxford's significant needs, particularly for affordable homes and the inability of the City to fully meet its own needs within its administrative boundary. Channelling development for Oxford's needs towards other settlements in Cherwell would result in longer distance commuting to Oxford, placing further pressures on the transport network. The new Green Belt boundaries are well defined and can last beyond the plan period.

Hampton Gay and Poyle PM - We do not support the justification for Development in the Green Belt for the following reasons: "Oxford's Urgent and Pressing Housing Need". It is fair to ask whether in the 21st century with fast internet access we require people to travel routinely into employment hubs to work. Clearly there are some workers (teachers, nurses etc) who need to but there appears to have been little thought given to how a burgeoning high-tech centre like Oxford should source its work force. We note that the Oxfordshire Growth Board is supporting housing developments in the Didcot area as well as the West Oxfordshire Garden Village. Surely this makes the case that development close to Oxford is not necessary. "The Clear Inability of Oxford to meet its own housing needs". But the other part is the extent to which Oxford can address this need itself without disturbing the Green Belt. Building on Brown Field sites in Oxford will alleviate many of these issues as well as reducing the issues that relate to commuting. They would also provide a greener solution as people would be more likely to walk or cycle to work than those from outside the ring road. "The absence of sustainable, deliverable and alternative sites". This is simply not correct. There is a lot of land within the Oxford ring road system that could be developed. To say that it is Green Belt ignores the fact that the land proposed for development is nearly all Green Belt. "The opportunity to create

a sustainable joined up vision for the whole of the north Oxford/Kidlington/A44 corridor area". This single statement effectively incorporates the seven statements which precede it - other than the one that relates to Woodstock. This key statement is thus repetitive and we address it here. Many of the statements leading into this key one are not actually the basis for Exceptional Development in the Green Belt. ("relationships between existing site..."; "unique place shaping of land in the vicinity of the Begbroke Science Park and the Oxford Canal"; "improvement to transport infrastructure in the north Oxford/A44/A4260 corridor"; "strengthening of Kidlington village centre related to sustainable transport improvements"; and" the opportunity for improvements to the quantity and quality of new public open space, green infrastructure and recreation facilities and in terms of access to the countryside". Clearly this is an aspirational afterthought sought to partially justify the proposed development. The "unique place shaping" comment is especially risible. However, there are many ways that such a vision could be created without the proposed development. Piecemeal encroachment onto the Green Belt in eight different locations seems a poor basis for such a vision.

Other comments include:

- Strong disagreement that 'exceptional circumstances' exist.
- The Plan is contrary to para 14 of the NPPF. It is also contrary to the twelve core land use planning principles set out in para 17 of the NPPF. Plan is also contrary to guidance in the NPPG.
- Green Belt should be considered as an entity or system not as a collection of individual land parcels.
- Green Belt is a permanent designation
- The overall level of growth is unnecessarily high. Alternatives to development in the Green Belt are available.
- The Green Belt was set up to safeguard the countryside from the City spreading into neighbouring countryside and to preserve the historic setting of the historic city.
- Traffic congestion will increase
- Kidlington is not the right place to build large estates. Yarnton and Kidlington have long histories as villages and do not deserve to be swallowed up in a great anonymous conurbation.
- Development could be located on sustainable sites identified elsewhere in the District rather than Green Belt.
- Traffic congestion and parking already a major problem.
- Why not adopt a Cambridge approach. Whilst taking areas of existing Green Belt create new Green Belt further out.
- The number of houses required has been grossly overestimated.
- The proposed developments contravene the five purposes of the Green Belt as set out in the NPPF.
- The proposals will remove the vulnerable Kidlington Gap.
- CDC is ignoring all aspects of their adopted Local Plan Part 1.
- Green Belt land is widely used for recreational purposes.
- Greater potential for flooding.
- The P&R is not feasible as no bus lane could be implemented due to bottlenecks.
- Shutting Sandy Lane is preposterous.

- There are far better sustainable sites which could make a whole new community.

Officer Response

The national importance given to the protection of designated Green Belts and the 'high bar' set for the removal of land from the Green Belt through Local Plan demonstration of 'exceptional circumstances' has necessarily been a fundamental principle of Plan preparation. The 'exceptional circumstances' test is different from the Development Management test of 'very special circumstances' for 'inappropriate' development within the Green Belt.

Officers have reviewed whether its examination of reasonable alternatives remains robust in the light of representations. The view remains that Areas of Search, other than Areas A and B, are unsuitable for the accommodation of the additional development required to meet Oxford's needs. The Council's approach to assessing exceptional circumstances has also been discussed with its Green Belt consultants in the context of comments made. A re-appraisal of the approach and options is not required. The exceptional circumstances set out at paragraph 5.17 of the Proposed Submission Plan are robust.

Transport Infrastructure

Approximately 30 comments were made on this section. These included representations from the following:

Begbroke PC – The proposed bus lane along the A44 is physically and financially impossible due to the restrictive widths of railway and canal bridge crossings plus the underpasses at Peartree Interchange. The rapid transit route will only be viable with Government funding. These improvements cannot be used to justify large scale housing development adjacent to the A44.

Oxfordshire County Council – The Plan generally aligns with LTP4 and the Oxford Transport Strategy. Whilst the proposed sites score highly in terms of sustainability, it should be recognised that there are high levels of traffic congestion in southern Cherwell and north Oxford which need to be remedied. The highway improvements within the highway boundary that are detailed in the Infrastructure Schedule are supported. The proposals would improve on existing, and provide new, pedestrian and cycle infrastructure between existing and new sites and ensure that the developments and infrastructure complement the LTP and corridor studies.

Highways England – Welcome policies and proposals that incorporate measures to reduce traffic generation at source both through good location and by facilitating and encouraging more sustainable travel behaviour. Note that the Plan seeks to locate the majority of development on land designated as Green Belt but that Cherwell District Council considers the circumstances to be exceptional. We would highlight the risk that if Green Belt development is not permitted it may need to be allocated elsewhere, which could potentially have a far more onerous impact on the highway network than is predicted. Nevertheless consider that if 4,400 dwellings are delivered in the plan period (in addition to the developments already committed in the Cherwell Local Plan) then there could be a significant impact on the operation of the SRN and the importance of the accurate assessment of this impact needs to be emphasised. Welcome the location of development in relatively close proximity to Oxford along key radial routes. There is the potential for frequent, high quality sustainable transport connections from the additional development sites to the Oxford urban

area. Should these not be in place then we consider that the traffic impact upon A34/A44 Peartree Interchange arising from the additional development is likely to be intolerable. We note that the PR does not appear to propose any highway infrastructure improvements to support the development proposal, only public transport infrastructure. However, the residual impacts are yet to be fully understood, as are any mitigation measures that may be a consequence of them.

Note that 1,180 dwellings have been put forward as extensions to the northern edge of the Oxford urban area. Extensions to the urban area could be considered suitable locations for development provided good accessibility to existing services and facilities exists and necessary supporting infrastructure (including public transport services) can be provided. Although we welcome the proximity to existing and planned sustainable transport infrastructure, we consider that the extensions proposed could affect the A34/A44 Peartree Interchange, the A34/Oxford Road junction and potentially M40 Junction 9. We note that the remaining 3,220 dwellings have been allocated to sites adjacent to Kidlington, Begbroke, Yarnton and Woodstock. Whilst some of these sites are located further away from the Strategic Road Network, it is likely car trips from these sites to Oxford will route via the A34/A44 Peartree Interchange and that a number of longer distance trips could also route via A34/A44 Peartree Interchange as well as the A34/Oxford Road junction. We consider that whilst some of the sites may have less of an impact on the strategic road network due to their size and/or proximity, the cumulative impact could be significant and it is recommended that an assessment of this impact is undertaken.

Other comments include:

- A significant number of the representations raise the issue of the existing traffic congestion problems in the area which will only be exacerbated by the proposed development.
- The proposed development will increase A34 use and congestion.
- References to the Oxford to Cambridge corridor are contradictory.
- The Expressway will be in direct competition with the rail link. This is contrary to the sustainable transport policies.
- Emissions will increase. No concern is shown about air quality.
- There are no adequate policies to assist in the necessary transition to the use of ULEVS.
- If development was concentrated along the two railway lines, commuters could access the centre of Oxford and towns /cities further afield without using the car.
- New transport infrastructure is needed to deal with existing needs. It does not model the impact of the additional houses.
- Plans currently unfunded.
- Begbroke and Yarnton will not be served by RTS and will suffer increased traffic.
- Strong objection to the closure of Sandy Lane.
- There are no buses from Begbroke to Kidlington.
- No mention is made of measures to encourage people to refrain from owning cars, such as promoting and providing space for car-sharing clubs.
- The planned new railway station seems to have very restricted access and no parking provision.
- No safe way to cycle to work.

Officer Response

Whilst the proposals for development within the Plan undoubtedly affect a challenging area of the district in transport terms – the interface with Oxford with main transport corridors (A44/A4260) into the city; connections with the A34 and A40; congestion at the Wolvercote, Cutteslowe and Peartree roundabouts and associated air quality issues, it is the view of officers that they represent the best opportunity for maximising the use of sustainable transport, reducing the reliance on the private car, ensuring high levels of accessibility to Oxford's places of employment, its universities, its services and facilities, and developing communities that are well-connected to Oxford.

Officers, with the Council's transport consultant, have worked in cooperation with Oxfordshire County Council from early stages of plan preparation through regular liaison meetings, through issue specific meetings at key stages of evidence preparation which resulted on the joint commissioning of transport modelling, understanding of the plan's effect on local and strategic road network, the identification of transport mitigation measures and culminated on the **joint sign-off** of the Transport Assessment supporting the plan. District and County officers met with Highways England at key stages of transport evidence and plan preparation.

In cooperation with the County Council, development locations were selected based on a 'lowest transport impact' basis, appraised through an iterative stage of model testing.

The County Council's proposals for rapid transit routes and strategic cycleway improvements within the Plan's growth area, its strategy for providing Park and Ride facilities further away from the city to encourage early 'modal shift', and its desire to improve traffic movements along both the A4260 and A44, integrate well with proposals for development immediately to the north of Oxford and along the A44 and provide clear opportunities. The aspirations of the Kidlington Masterplan SPD to improve sustainable connectivity within the wider Kidlington / Begbroke / Yarnton area are also informative.

Alignment with the Oxford Transport Strategy, contained within the County Council's Local Transport Plan, has been a central theme of the Plan. Highways England's view that if Green Belt development were not to come forward, land allocations elsewhere could potentially have a far more onerous impact on the highway network is illustrative of the appropriateness of the proposed strategy in transport terms, notwithstanding the highway capacity challenges that endure.

The representation from Highways England has been considered by the Council's transport consultant and discussed at a meeting attended by Highways England and the County Council.

Officers from the three authorities discussed the effect of the plan on the M40 J9, A34 and A34 junctions and agreed that the main residual issues are concentrated upon the Peartree interchange which suffers from peak traffic congestion even without growth from the Partial Review.

The Plan's concentrated focus on sustainable travel helps to minimise additional impacts and there is an understanding that implementation would need to include improvements to bus services operating through the Peartree interchange and Loop Farm roundabout. There is agreement with the highway authorities that junction 'microsimulation' work may need to be taken forward once there is greater certainty over the precise nature of development.

Through the Growth Board, the Oxfordshire councils have reached an Outline Agreement with Government for an Oxfordshire Growth Deal. Subject to agreement on a required Delivery Plan, it

will commit the Government to a 5 year (2018-2023) £250m funding package which includes addressing the transport infrastructure requirements of growth to 2031. This is in the context of the Oxfordshire councils committing to delivering 100,000 homes (2011-2031) in line with the need identified in the SHMA 2014. The Partial Review's sustainable transport mitigation package is included in the emerging Growth Deal under 'North Oxford All Modes Corridor Improvements'.

It is the view of officers that the Plan's proposals represent the most sustainable approach to addressing the local highway issues. There is clear alignment with the County Council's policies and programmes as Local Highway Authority. Strategic highway schemes have been identified in the Oxfordshire Infrastructure Strategy which will ensure countywide coordination and form the basis for funding bids. Officers will continue to work closely with the County Council and Highways England to secure investment for the transport improvements including strategic funding such as from the Growth Deal and Local Growth Fund, funding from developer contributions and from the capital programmes of the relevant authorities.

The Plan, its sustainability and its deliverability do not depend on the provision of a railway halt/station. Land is safeguarded to assist with a longer term aspiration following discussions with the site promoter (site PR8) and initial exploratory discussions with the rail industry.

Officers from the county and district councils are agreed that the potential closure of Sandy Lane to vehicular traffic would not affect the operation of the Strategic Road Network, that modelling evidence shows that Langford Lane operates under capacity and could absorb displaced vehicular moments; and, that modelling shows that the A40-A44 link road (highlighted by West Oxfordshire District Council) is not required to deliver the growth in the Partial Review. Officers recommend that Sandy Lane's potential closure, aligned with the implementation of rapid transit routes, is retained within the Plan to maximise the potential for the use of sustainable transport, to create a high quality 'green link' between Begbroke/Yarnton and Kidlington, to achieve a high quality of development within site PR8 and to assist Network Rail with the closure of the level crossing for safety reasons.

The potential closure of the Sandy Lane level crossing has been discussed with and welcomed by Network Rail. It has also been agreed to introduce a minor amendment to the Plan requiring consultation with it on the development brief for site PR8 in part to avoid the pedestrian/cycle/wheelchair use of the Yarnton Lane/Green Lane as a preferred route that might lead to more intensive use of the level crossing thereon. It has been agreed that the Plan's proposals do not materially lead to increased vehicular traffic over the crossing. Nevertheless, Network Rail wishes to explore its potential for closure. The closure of both Sandy Lane and Yarnton Lane level crossings would be of significant benefit to Network Rail in terms of health and safety, journey times and rail capacity.

Overall, having reviewed all the comments submitted, officers are of the view that a change is not required to the plan's strategy for transportation but that the focused changes would improve the final document in light of detailed comments made.

General Comments

Approximately 50 general comments were made on Section 5 of the Plan. These included representations from the following:

Gosford and Water Eaton PC -1410 new houses are proposed within the Parish. This represents 32% of the total allocation and would lead to a 208% increase in the number of houses within the Parish. It would lead to the removal of nearly 100Ha of land from the Green Belt, 12% of the total Green Belt in the Parish. This would result in a substantial reduction in the Green Belt at the narrowest point between Gosford and Water Eaton, Kidlington and Oxford. The impact of this level of development on the environment, community and infrastructure of the Parish will be substantial.

Not convinced that the negative effects on the road network can be adequately mitigated and there is insufficient evidence that infrastructure improvements can be delivered. The proposal will lead to the substantial loss of countryside; increase the pollution to the area, impact on recreational facilities and on the landscape wildlife and historic environment. Furthermore, are not convinced that the figure of 4400 is justified or appropriate for meeting Oxford's Unmet Needs. Not convinced that the spatial strategy as put forward is the most appropriate nor will it be deliverable without major impacts on the existing community and environment.

The draft vision gives insufficient consideration to the impact of the proposals on existing communities and the environment. To achieve balanced communities, the needs of the existing villages, and their villagers, need to be taken into account. Local services (schools, transport, parking, and medical centres) are already under strain. An additional 4400 houses in Cherwell (1410 of which are in the Parish) together with further growth at Banbury, Bicester and Upper Heyford will put further pressure on the transport network through our Parish and exacerbate the problem. Additional land will be required, in some cases, to provide additional transport infrastructure whether this is road improvements, bus lane or cycleways. This will result in further development and urbanisation within the Parish and the destruction of further Green Belt/green spaces.

Hampton Gay and Poyle PM - Regarding the Strategic Objectives noted on page 7 of the Submission Plan summary document: -SO16: clearly District, City and County Councils need to work together. However do not agree with this objective as it makes no consideration of the needs and wishes of the Kidlington/Yarnton/Begbroke communities that are being fundamentally sacrificed in respect of their Green Belt and historical/environmental contexts. It makes no reference to the priority that should be attached to the city re-evaluating all opportunities to provide housing for key workers within the city itself. -SO17: as noted above, we do not accept that meeting Oxford's needs is the only consideration to support economic growth in Oxford and Cherwell. Developing local communities with local residents working in local businesses, or in the digital age utilising outlying operations of Oxford centric organisations, should be considered. That approach could consider sites across Cherwell (and Oxfordshire) not just the Kidlington/Yarnton/Begbroke area, representing a dilution and dispersal of the currently proposed intense developments. -SO18: clearly this is an important objective for meeting the needs of Oxford's key workers but we do not agree with it as drafted as it makes no consideration of a priority to re-evaluate opportunities within the city to house such workers, does not consider outlying areas for remote workers as suggested for SO17 above, nor has any reference to guaranteeing how new housing will be reserved for Oxford's key workers and not London commuters from Oxford Parkway. -SO19: this objective is ok as far as it goes but it does not consider developing transport strategy across Cherwell and Oxfordshire to make

Oxford more accessible from developing existing transport links in outlying areas. Implicit is the assumption that transport development is by reference only to the proposed Kidlington/Yarnton/Begbroke developments.

Vale of White Horse DC - welcome the approach taken by Cherwell District Council to deliver the agreed apportionment of un-met housing need for the district, and that this is to be delivered on sites which are demonstrably close to Oxford city.

Oxfordshire County Council – Content relating to rights of way and access to the countryside is supported. The attention that is given to green infrastructure (GI), landscape and biodiversity in the plan and the detailed guidance that is given to these items within the individual site allocation briefs is supported. Although section 5.141 recognises that infrastructure necessary to support planned developments must be provided in a timely manner, no specific reference is made the need for health promoting infrastructure, such as community facilities, walkways and cycle paths to be provided from the outset or as near to the start of the development process as possible.

Oxford Preservation Trust – If it is eventually determined that there are exceptional circumstances sufficient to justify land being taken out of the Green Belt, then some compensation land should be provided, which provides publicly accessible green space & improves biodiversity, together with measures to ensure that this is permanent. In addition, higher contributions put towards enhancement of existing Green Belt & any new local areas of permanent open space.

Other comments include:

- How can green space be improved when houses are to be built on existing Green Belt and a golf course has to be relocated?
- The claim of strengthening Kidlington village centre is wholly unrealistic.
- These proposals benefit Oxford City but are to the detriment of the residents of Yarnton and Begbroke.
- There are no exceptional circumstances to develop in the Green Belt.
- Concerns raised about deliverability of the proposed sites within the timescale of the Plan.
- The figure for new employment is grossly overestimated.
- Broad support for Vision and Objectives.
- Increased risk of flooding.
- The Council needs to reassess the overarching spatial strategy.
- Reassessment of the Green Belt release sites is required.
- The proposed allocations allow for no flexibility if additional need is identified or if sites are delayed.
- The strategy should provide for the allocation of a portfolio of sites at sustainable settlements, notably the service villages.

Officer Response

The varied comments received have been noted and have been considered in reviewing the soundness and legal compliance of the Plan. Many of the representations repeat comments made

under other sections and policies in the Plan and the officer comments applicable to those sections apply equally here.

Policy PR1 – Achieving Sustainable Development for Oxford’s Needs

Over 750 comments were received in relation to this policy. The vast majority raised objections. Comments included representations from the following:

Hanwell PC - The plan substantially overstates Oxford's total housing need and does not satisfactorily identify the amount that Oxford might not be able to meet. Oxford is capable of accommodating all or almost all of it by switching land earmarked for business to housing instead. It is therefore premature for Cherwell to even start the process of accommodating it.

Gosford & Water Eaton PC - Concerned that the figure of 4400 homes of which 1410 (32%) are within the Parish area is not appropriately justified given the impact on the Green Belt, the environment and infrastructure. Not convinced that this level of development can be delivered with the necessary transport and other infrastructure and without detrimental impact on both existing residents and those of the new communities. It is difficult to see how the proposals are consistent with some policies of the existing Development Plan, notably Policy ESD13 of the adopted Local Plan, in terms of the impact on local landscape character. By increasing visual intrusion and harming the local landscape these development proposals would be contrary to these policies. Policy ESD15 seeks to respect an area’s unique built, natural and cultural context. Development on the scale proposed which will increase the number of houses within the Parish by 208% will not secure this goal. Similarly, for the reasons set out above in terms of impact on local communities and the environment the proposals would not achieve sustainable development and would not be consistent with the NPPF.

Kidlington PC - Until the Oxford City local plan has been examined & completed, the exact level of unmet need is uncertain, due to the mismatch between the 2031 date in the SHMA, & the 2036 date in the Plan. The Government's recent "Planning for the Right Homes in the Right Places" document on how OAN should be calculated means both Oxford & CDC's Partial Review Plans (CPRLP) will be subject to the new guidance. Thus, revisions may be required to update the 2014 SHMA. The Government indicate that both CDC & Oxford have overestimated the level of new housing required, & significantly less growth is needed. It is premature to make decisions on the Partial Review Plan, which only concerns accommodating Oxford's unmet need, until the Authorities have progressed to accurate conclusions on an updated OAN for Oxford.

More detailed work is essential to determine the up to date OAN for Oxford City, & to maximise the use of land within the City boundary for new housing. The scale of unmet need can then be properly established. The Oxford Growth Board needs to consider afresh the distribution of newly calculated unmet need between the neighbouring authorities, giving greater weight to the importance of avoiding the release of Green Belt (GB) land in Cherwell in particular, where studies have confirmed that existing GB land performs an essential GB function in terms of the NPPF. Until these processes have been completed, PR1 cannot be proven to be justified or in accordance with the NPPF in relation to the permanence of GB. PR1 provides an unacceptable starting point for the remainder of the Plan, & is premature in advance of up to date research. The scale of growth proposed at 4400 dwellings is too high & needs to be reduced in order to better achieve sustainable development. The

Parish Council considers that any further development will lead to detrimental effects on the community and environment.

Hampton Gay and Poyle PM - Policy PR1 is flawed as it implicitly accepts without question the requirement to deliver these houses, which we have challenged elsewhere. However, the use of the term "sustainable development" is frustrating as there is no clear evidence that these developments will meet any nationally acceptable sustainability criteria.

Oxford City Council - Welcomes that the Partial Review makes provision to accommodate sustainable development to deliver the Cherwell apportionment (as agreed by the Oxfordshire Growth Board) of 4,400 homes, in full & by 2031 (Policy PR1). The lead-in time for such large sites is noted in the Growth Board memorandum, & as such it seems appropriate to prepare the trajectory with a delivery start date of 2021 as the plan also supports earlier delivery where possible. Encourages earlier delivery where possible on the sites allocated in the Partial Review, & is keen to continue the positive joint working & enhanced collaboration as the sites progress towards more detailed design & delivery.

Kidlington Development Watch - Object to the proposal for 4,400 homes in Cherwell to meet Oxford's needs. The 4,400 figure is not justified because it is based on the discredited calculations of the Oxfordshire SHMA which have been heavily criticised since they were made public in early 2014. The existence of Green Belt, as provided for in the NPPF, is a reason not to meet assessed need and the Council should have considered this in its assessment of alternatives. In the recent (Sept 2017) Government consultation "Planning for the right homes in the right places", the method proposed by DCLG in the consultation, which includes uplifts to account for affordability, results in an annual housing need for Cherwell of 762 (compared with 1142 in the SHMA) and for Oxford City of 746 (compared with a range of 1200-1600 in the SHMA). We note that the Oxfordshire SHMA deemed that no uplift for economic growth was necessary for Oxford City even on the most optimistic scenario. The new DCLG figures indicate that the SHMA numbers for both Districts are excessive as we, and others, have consistently argued since they were published. Oxford's need and its ability to accommodate it, has not yet been tested through a local plan examination. Its local plan is under preparation and is due to be submitted in December 2018. The new DCLG method is intended to apply to plans submitted after March 2018 so should apply to Oxford's local plan. It would clearly be premature for Cherwell to plan now to meet Oxford's unmet need on the basis of any number higher than 746 per annum. To plan for more would run the serious risks of over-allocating land and unnecessarily damaging the Green Belt. The Council's definition of "Sustainable Development" is elastic. It means whatever the Council chooses it to mean. Interestingly it is not defined in the glossary. In policy PR1 the Council even chooses to say what is included in the definition "for the purpose of the Partial Review". The use of the phrase in this plan is meaningless. We object to the proposal for 4,400 houses in the Green Belt as it is not sustainable because it would mean that: traffic problems would get much worse, public services and other infrastructure would be even more stretched, open countryside in the Green Belt, which is intended to be permanent, would be sacrificed for ever. Countryside walks and views would be lost to local residents in Kidlington, Begbroke and Yarnton who do not have the benefit of local parks, and for whom the countryside is currently a substitute. Natural habitats would be destroyed. The natural environment will be a major causality. Loss of habitat and increased recreational use of the green spaces that remain will stress and endanger wildlife. We think that the Council's contention that the development will result in a

net increase in biodiversity is implausible and not supported by evidence. Environmental quality and quality of life for existing residents will suffer as air, noise and light pollution would increase.

Other comments include:

- Objection to building 4,400 houses in this area for Oxford overspill. 4,400 houses is not a justified or proven requirement. It is unsustainable, Oxford should do more to meet its own needs.
- In light of the Government's consultation on its new approach to housing assessment, CDC should halt the current process and reassess its figures before continuing.
- The SHMA is discredited.
- It is premature to make decisions on the Partial Review. The Plan should be halted until the Oxford City Local Plan has been completed.
- The apportionment of 4,400 houses can only be treated as a minimum.
- Sufficient flexibility needs to be built in to the Plan to provide for contingency.
- There are no exceptional circumstances to develop in Green Belt.
- Unused property and land in Oxford should be developed first before destroying the countryside.
- The additional traffic has not been factored in to this Plan.
- There is no evidence that the proposed Rapid Transit route will either deliver the required numbers nor be a practical solution at rush hour.
- Without a cheap, effective, reliable and convenient public transport scheme, the linkage between homes in Kidlington and jobs in Oxford fails.
- The villages do not have the infrastructure to support this expansion.
- Oxford City Council has been allocating land in the City for employment instead of for housing. It has ignored the impact on surrounding Districts and failed in the Duty to Cooperate.
- Housing development on this scale is not justified in the Green Belt.
- The University and colleges could do much more with their property in the City rather than building on Green Belt.
- Unfair that Oxford will protect its own Green Belt and green spaces but expects the surrounding areas to destroy their Green Belt and green amenities for their enhancement.
- The character of Yarnton and Begbroke will be destroyed.
- Natural habitats and wildlife would be destroyed.
- Houses will be bought by London commuters.
- Increased traffic congestion.
- Green Belt is a permanent designation.
- Development cannot be guaranteed to provide truly affordable housing.
- Housing allocations in the Kidlington Gap should be removed.
- No consideration of the Kidlington Master Plan.
- The densities proposed are too low.
- All infrastructure should be provided before the development is complete.

Officer Response

These wide ranging comments have been noted. However, officers consider that this policy is 'sound' and no changes are proposed.

Policy PR2 – Housing Mix, Tenure and Size

Approximately 40 comments were made on this policy. These included representations from the following:

Gosford and Water Eaton PC - Supports the overall approach to providing high levels of affordable housing. How will affordable housing be defined so that it is truly affordable for those in need? The same affordability problems exist for residents of Gosford and Water Eaton as for those in Oxford. The Plan should ensure that new affordable housing is equally available to residents in Gosford and Water Eaton. It is important that affordable housing is delivered in accordance with the policy and not watered down as a result of developer pressure. Appropriate mechanisms need to be in place to secure the affordable housing in perpetuity. Providing housing for key workers is welcomed however how this will be made is unclear in the policy and would welcome explicit and secure inclusion. In the case of market housing there is concern that an appropriate mix is provided and not just executive homes. The mix of housing type is not set out in the policy. In addition, are concerned that buy to let landlords may purchase market housing, making it less affordable.

Kidlington PC - There needs to be greater detail in the Policy & supporting text (or an Appendix) regarding how affordable housing will be defined & delivered such that it continues to remain affordable for all local residents working in Oxford. Further details should also be given on the mix of market housing type and how key worker housing will be provided. There are concerns that CDC housing clients might be displaced from the Housing Waiting List by Oxford clients.

Oxford City Council - The City Council's priority for addressing the needs of those on the housing register would be for social rent homes. Welcomes the ongoing dialogue with CDC planning & housing colleagues, to discuss delivery of affordable housing at the sites allocated through the Partial Review, & particularly the allocations policy for rented affordable housing. It is envisaged that these discussions will culminate in an agreed strategy or process for allocating nomination rights to the City Council for those on its housing register. It is supported that 'key worker' housing may be delivered as part of the remaining 20% intermediate affordable housing. Proposing to take a new approach to this issue & not using the term key worker in its emerging policy approaches in the Oxford Local Plan; the Preferred Options proposes an approach aligned more with income & affordability rather than specific employers or sectors.

Other comments include:

- Insufficient certainty that affordable housing will be delivered.
- What is the definition of 'affordable housing'?
- 80% of market value is not affordable.
- There is no visible process for how the affordable housing allocation will work in practice.
- Within the definition of affordable housing specific allowance should be made for key workers employed by the University and Colleges.

- Nomination rights for rented property should be in the control of CDC.
- No provision for people living in CDC who are employed in Oxford.
- A proportion of the housing needs to be allocated for people living in Kidlington, Gosford, Yarnton and Begbroke who are also affected by inflated house prices in the area.
- No visible process for nomination rights.
- There is no agreement on the mix of housing that is required.
- Only land owned by the University should afford key worker status to university staff.
- Policy exclusively promotes self-contained dwellings. The opportunities represented by purpose built HMOs and cohousing have been overlooked/excluded.
- Policy could be expanded to allow provision of employer funded housing and student housing.
- No reference to the need for care homes and nursing homes.
- Criterion for self-build/ self-finish units should be removed.
- Policy requires more flexibility to allow housing mix to be determined on a site by site basis, and a departure from policy where adequate justification and evidence is submitted as part of individual planning applications.
- Concern that Oxford University and its colleges may be exempted from any infrastructure contributions through charitable exemption.

Officer Response

Securing the delivery of affordable housing is critical in helping to meet Oxford's housing needs in the context of the 2014 SHMA and Oxford's Housing Strategy. Officers from the two Councils have been in discussion with a view to agreeing an outline approach for the cross border allocation of housing. The discussions have been broadened out in the context of other Oxfordshire local plans seeking to address Oxford's needs and cooperative work on the Oxfordshire Growth Deal which includes the delivery of affordable homes.

Officers consider that the Plan's approach to tailor the overall need for affordable housing to Oxford's needs to be required and deliverable in the context of evidence including the Plan's viability assessment (evidence doc. PR49). Agreement between the two councils as housing authorities will help ensure timely delivery. The concerns raised in representations about the wider 'affordability' of market housing and the risk that it is not readily available to those working within Oxford go beyond spatial planning issues, but the provision of additional housing would assist movement within the market and officers consider that Policy PR2 - Housing Mix, Tenure and Size would help tailor the new housing to local needs.

In the interest of consistency a proposed focused change includes the addition of the proposed 50% affordable housing requirement to Policy 12b: Sites Not Allocated in the Partial Review.

Policy PR3: The Oxford Green Belt

This policy received the most comments of any in the Plan. Over 850 comments were made, the vast majority of which raised objections. Comments included representations from the following:

Gosford and Water Eaton PC - 95% of the land within the Parish is within the Green Belt. The plan as proposed allocates 3 significant sites for housing and removes 2 others from the Green Belt. In total,

this involves the removal of nearly 100 hectares of land from the Green Belt within the Parish Council's area which represents 12% of Green Belt in the Parish. This loss will occur in the narrow gap between Gosford and Water Eaton Parish and the village of Kidlington with north Oxford reducing the separation substantially leaving very little undeveloped land between the settlements. It will result in the urbanisation of Gosford and Water Eaton Parish with a 208% increase in the number of houses within the Parish. Noted that in the Green Belt Study (April 2017) all the site allocations in the Parish were identified as "High" or "Moderate High" in terms of harm to the Green Belt from their release for development. Indeed, of all the sites considered in the study within Gosford and Water Eaton the majority are also given a "High" or "Moderate High" ranking. It is clear that releasing this land for development of 1410 dwellings will lead to the coalescence or near coalescence of Kidlington, Gosford and Water Eaton and Oxford. The remaining gap is heavily dominated by transport infrastructure (railways and major roads) and therefore does very little to preserve any real sense of openness which is a key function of Green Belt policy. With such a narrow gap it will be much more difficult to retain any real sense of separate identity for Gosford and Water Eaton and for Kidlington. Would also highlight a clear inconsistency in the way Cherwell District and Oxford City have approached the review of Green Belt sites as part of their Local Plan process. Both authorities have carried out Green Belt Studies using the same consultants (LUC) and the same methodology which assesses the harm associated with releasing sites for development. In the Oxford City Council – Background Paper Preferred Options on Housing Needs and Supply June 2017 it states on page 5: "On balance, the proposed policy approach in the Local Plan is to exclude from the site allocations process any sites or parcels which would have a "high" harm or "moderate high" harm impact. These sites are therefore not to be taken forward for further consideration. By contrast all the sites allocated by Cherwell in Gosford and Water Eaton are scored "moderate high" or "high". This is a fundamental inconsistency in the approach adopted and begs the question as to whether Oxford City have really considered all options for development within the City boundary to an equal extent as within Cherwell. In our view this throws further doubt on the appropriateness of the figure of 1410 houses for Gosford and Water Eaton. In conclusion our view is that development of the three sites in the Parish for 1410 dwellings will fundamentally undermine the key purposes of the Green Belt and should not be permitted to go ahead.

Kidlington PC - Delete references to removal of sites PR3c, PR3d, PR6a, PR6b, PR8 from the Green Belt. Exceptional circumstances have not been demonstrated in relation to the scale of need that should be accommodated in Cherwell District. All the proposed sites are categorised as scoring high or moderate/high in importance in the GB study, in respect of preventing neighbouring towns merging into each other (See Figure 4.3 Oxford Green Belt Study 2015). They should be excluded from further consideration for new development & consistent with the findings of the Oxford City Preferred Options Local Plan. The Cherwell GB study 2017 downgrades the importance of some of the sites & scores land south of the railway & land west of Kidlington high in terms of harm. Substantial reduction of the GB is wholly incompatible with the strategic need for a GB. The effects of the planned allocations would be to reduce the width of the GB between the expanded settlement of Oxford & Kidlington to less than 1Km in places, in a location where much of the intervening gap is occupied by transport infrastructure. Exceptional circumstances have not been demonstrated in relation to the scale of need that should be accommodated in Cherwell District. All the proposed sites are categorised as scoring high or moderate/high in importance in the GB study, in respect of preventing neighbouring towns merging into each other (See Figure 4.3 Oxford Green

Belt Study 2015). They should be excluded from further consideration for new development & consistent with the findings of the Oxford City Preferred Options Local Plan. The Cherwell GB study 2017 downgrades the importance of some of the sites & scores land south of the railway & land west of Kidlington high in terms of harm. Substantial reduction of the GB is wholly incompatible with the strategic need for a GB.

Begbroke PC – Do not agree that there are exceptional circumstances for developing in the Green Belt. Have no confidence that the Green Belt will be sustained and that land adjacent to Begbroke Lane will not be proposed for future development. Our residents do not want organisations or other landowners with vested interests to destroy our pleasant environment to satisfy their own interests.

Yarnton PC - Policies PR8 & PR9 propose removal of land from the Oxford GB. This is not consistent with National Policy and is unsound. The 'exceptional circumstances' justifying its removal para 5.17 (p66) are largely implausible. The Plan shoehorns in a number of homes close to Oxford City without regard to the identities of Yarnton & Begbroke & without effective infrastructure.

Hampton Gay and Poyle PM - Policy PR3 is flawed as it sets out to allow for exceptional changes to the Green Belt. 3. Most of the proposals violate a key Green Belt purpose. On page 2, the second of these is stated to be 'to prevent neighbouring towns merging into one another'. Several of the sites, if developed, would directly contravene this purpose.

Weston on the Green PC - Objection to Options A and B as National Planning Policy states that a local planning authority should regard the construction of new buildings as inappropriate in GB. There are no exceptional circumstances for development in the Green Belt.

Wolvercote Neighbourhood Forum - Do not consider that the policy of building on the Green Belt has been based on an "objectively assessed" housing need, and therefore it has not been positively prepared nor justified. We question whether any housing to meet the unmet housing need should be built on the Green Belt without first exploring other ways of meeting Oxford's housing needs, for example by Oxford City Council using land within its boundaries for housing rather than for employment, and building homes at a higher density. The Government has recently put forward a new way of calculating objectively assessed housing need and this suggests that housing needs and therefore unmet housing needs have been wrongly calculated and overestimated. Oxford City Council has not yet prepared a local plan (it is only at the Preferred Options stage) so there is currently no estimate of how much housing it can provide itself and so the unmet need cannot be accurately determined. Proposing to build more homes under these circumstances is irresponsible and makes the plan unsound. Do not support building on the Green Belt. A new community could be built on an existing brownfield site at Shipton on Cherwell quarry. The transport infrastructure could not cope with the additional traffic which building new homes on the Green Belt north of Oxford would bring.

West Oxfordshire DC - Exceptional circumstances have been demonstrated to justify the release of sites from the GB, including sites for housing to help meet Oxford City's unmet housing needs, and sites for necessary transport infrastructure. It is clear from the evidence base for Cherwell's proposed submission plan and from the Oxfordshire Growth Board evidence base that the release of sites from the GB is necessary to deliver the scale of housing required in a sustainable manner. It is important to consider the relationship of sites with Oxford and consider how well they contribute to

helping meet Oxford's needs. The proposed housing sites to be released from the GB relate well to Oxford and to proposed or existing transport infrastructure.

Oxfordshire County Council - The removal of the Water Eaton Park & Ride (P&R) site from the Green Belt (site PR3d) is a positive step and is strongly supported by OCC.

CPRE - The SHMA is explicit that Authorities are not expected to meet OAN (Objectively Assessed Need) in full if e.g. it would necessitate Green Belt development. It has been the unforced choice – not the requirement – of Oxfordshire's Councils to agree to meet the SHMA need in full despite wide swathes of Oxfordshire being GB and AONB. It is therefore incumbent on Councils to take on each other's' "unmet need" if it would otherwise require GB land to be released. As shown, Oxford's unmet need is very far indeed from being quantified or crystallised, but, if it were, it would be the duty of other Councils to assist Cherwell in meeting its part of that need without releasing GB land, not least by assisting Cherwell to understand how to do so within its own borders. There is no evidence that this has been attempted. CDC should re-visit the process, as and when the final numbers for Oxford have been examined, adopting higher densities and prioritising protection for the GB.

Kidlington Development Watch - Object strongly to the proposal to remove land from the Oxford Green Belt. The Green Belt around Kidlington is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Kidlington does not have many green spaces within it, and no park, and the surrounding Green Belt helps to compensate for this. The submission document does not sufficiently take into account the recently adopted Kidlington Masterplan SPD which is written on the basis that the surrounding Green Belt remains fundamentally unchanged. In particular we draw attention to the objective to strengthen Kidlington's distinctive character of a 'village set in the landscape' and the objective to 'protect and enhance Kidlington's landscape and biodiversity assets'. Above all, the Green Belt exists to protect the historic city of Oxford from the effects of over-development as is acknowledged in the adopted Cherwell Local Plan. Government guidance states that Green Belt is a permanent designation and that the existence of Green Belt is a reason not to meet objectively assessed need in full. It also states that unmet housing need is not a reason for building in the Green Belt. Cherwell Council has made no allowance for this in the submission plan. All of the Green Belt around Kidlington contributes to the purposes set out in the NPPF as has been shown in local studies. Government guidance and Cherwell's existing policy to protect the Green Belt should be upheld.

Other comments include:

- Objection to the removal of land from the Oxford GB. The GB preserves open spaces that are much appreciated by local residents, protects both the historic city of Oxford from overdevelopment and neighbouring villages from coalescence. Government guidance says that GB is a permanent designation and that unmet housing need is not a reason for building in the GB. The Plan is therefore not consistent with National policy.
- In light of the Government's consultation on its new approach to housing assessment, Cherwell DC should halt the current process and reassess its figures before continuing. If or when the process does continue, housing development on this scale is not justified on Green

Belt sites around Kidlington, Yarnton and Begbroke and alternative sites in the district should be reassessed.

- A more thorough Green Belt Review is required which should include a full assessment of the sites against the five purposes of the Green Belt. The additional work needs to explore and justify why the Council has chosen to pursue development at these Green Belt sites which will see the coalescence of three existing settlements over other more suitable development options.
- Green Belt should be preserved at all costs.
- Exceptional circumstances have not been demonstrated.
- The Plan should focus on regenerating and recycling of land within Oxford, increasing densities and prioritising affordable housing over employment sites.
- Plan is not consistent with CDC's adopted Local Plan policies.
- Plan will create urban sprawl. One of the purposes of the Green Belt is to prevent urban sprawl.
- Plan is not consistent with NPPF and Government policy.
- Green Belt preserves green spaces that are greatly appreciated and enjoyed by local residents.
- Housing allocations in the Kidlington Gap should be removed.
- Up to date statistics should be used.
- No development unless infrastructure is provided.
- There is unused land in Oxford which could be developed.
- Roads and infrastructure will be overwhelmed.
- Support for the principle of the revision of the Green Belt boundary.
- If PR3d is removed from the Green Belt it could open the door for other development on the Parkway site.
- The amount of Green Belt to be removed in such a small area is disproportionate.
- CDC should restart their Partial Review once Oxford City's housing need has been properly examined and when Cherwell does this it should have due regard for the importance and functions of the Green Belt.
- The alternative County Town strategy should be adopted to disperse both housing and economic growth throughout the county.
- Cherwell need to repackage and represent the need for a strategic review of the Green Belt and also take a comprehensive approach to include University and inward investor needs given that the prospect of a further Green Belt review is unlikely for a generation.

Officer Response

The national importance given to the protection of designated Green Belts and the 'high bar' set for the removal of land from the Green Belt through Local Plan demonstration of 'exceptional circumstances' has necessarily been a fundamental principle of Plan preparation. The 'exceptional circumstances' test is different from the Development Management test of 'very special circumstances' for 'inappropriate' development within the Green Belt.

Officers have reviewed whether its examination of reasonable alternatives remains robust in the light of representations. The view remains that Areas of Search, other than Areas A and B, are

unsuitable for the accommodation of the additional development required to meet Oxford's needs. The Council's approach to assessing exceptional circumstances has also been discussed with its Green Belt consultants in the context of comments made. A re-appraisal of the approach and options is not required. They are of the clear view that the exceptional circumstances set out at paragraph 5.17 of the Proposed Submission Plan are robust

Policy PR4a – Sustainable Transport

Approximately 70 comments were received relating to this policy. These included representations from the following:

Network Rail - Any development which would result in a material increase or significant change in the character of traffic using these rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

Highways England – Transport Modelling - With the enhanced transport improvement package, modelling shows that the links on the A44 corridor appear to be approaching or over-capacity in 2031 for both morning and evening peak hours, while some junctions along these corridors are predicted to be experiencing delay. We understand that two packages of strategic off-site transport improvements were tested. There is a lack of clarity regarding the schemes included within these model runs (including those discussed in the PR such as a new rail station at Yarnton/Kidlington, the conversion of the A34/A44 Peartree Junction to signal controlled, the severing of Sandy Lane, the A40/A44 link road and the mode shift to cycling). Further clarity is sought on details of model infrastructure inputs in this regard. We note that following the implementation of PR development there are predicted to be capacity issues along the A34 and at M40 Junction 9. It is not fully clear whether or how the operation is predicted to worsen when compared to the Do Minimum scenario. It is requested that a more comprehensive set of outputs is provided to enable HE to assess the impact of the PR development on the SRN and to assess whether the proposed transport improvement measures sufficiently mitigate those impacts. Furthermore, we are unaware of any more detailed junction modelling that has been undertaken. It is recommended that junction-specific models are used to assess the operation of the SRN both without development and with development and the proposed infrastructure measures. In connection with this, sensitivity testing should be carried out for scenarios in which the provision of infrastructure that would affect the SRN is/ is not included.

Consider that if 4,400 dwellings are delivered in the plan period (in addition to the developments already committed in the Cherwell Local Plan) then there could be a significant impact on the operation of the SRN and the importance of the accurate assessment of this impact needs to be emphasised. It should be noted that the development sites away from urban centres may not benefit from some of the existing urban sustainable transport options available. It is therefore important that sufficient sustainable transport solutions are provided to/from the development in these areas to ensure the impact of additional traffic on the network is minimised where possible. Welcome the intention to prepare Transport Assessments and Travel Plans to support all development identified to meet Oxford's unmet housing need.

West Oxfordshire DC - Transport and infrastructure are key issues and growth in Cherwell needs to be looked at cumulatively with growth in West Oxfordshire. The two local planning authorities share the A44 corridor, and this together with the A40 feeds into the congested Wolvercote roundabout. Growth in Cherwell and West Oxfordshire may have implications for northern Oxford and for the A34. The impact of the A44 corridor needs to be carefully considered, and it is vital that both districts work together with the County Council to bring forward the proposed A40/A44 link together with improvements to the A44. Consideration should be given to improving rail links by providing a new station at Begbroke. The two Councils should work together on the delivery of their Infrastructure Delivery Plans. Policy PR4a provides an appropriate framework for this to happen. Agree with the expectation that strategic developments will be expected to provide proportionate financial contributions towards necessary infrastructure and services.

Oxford City Council - The strategy seeks to locate development so that it is well connected to Oxford & supports the city's economy (Policy PR4a); & in addition it seeks to offer people convenient affordable & sustainable travel opportunities to the city's places of work, services, & facilities; These guiding principles are all welcomed.

Begbroke PC - Sandy Lane: Vehicles travelling to and from Kidlington and other destinations frequently use this road. Closure will have a major impact on Begbroke, Frieze Way, Langford Lane and the A4260. Oxfordshire County Council wish to divert traffic from the Kidlington, south bound A4260 along A4095 to A44 and continue through Begbroke. The proposed P&R at Campsfield Rd will again cause further traffic problems. This will cause further problems in Begbroke with attempting to cross the A44 and cause even further delays at Wolvercote and Cutteslowe Roundabouts. This does not even account for the 4500 houses. It will cause further problems in Begbroke with attempting to cross the A44 and cause even further delays at Wolvercote and Cutteslowe Roundabouts. This does not even account for the 4500 houses. Traffic problem pictures are shown of Langford Lane with an event held at Blenheim adjacent to proposed P&R and Campsfield Rd, Langford Lane and Parking Places at Oxford Technology Park. Key commuter routes including Sunderland Avenue and Banbury Road more congested

Gosford and Water Eaton PC - North Oxford suffers from "high levels of congestion and delay" and there are Air Quality Management Areas across the whole city as a whole and on a small section of the Bicester Road due to high levels of pollution. The Parish Council considers that 4400 new homes (with 1410 in the Parish) will exacerbate these problems further and is not convinced that the transport measures set out are deliverable and will address these problems. Gosford and Water Eaton is criss-crossed by the main major highways (A34, A44 and A4165) bringing commuters and visitors to the City. Additional houses allocated within the Parish, and at Begbroke, Yarnton, Woodstock and Kidlington as well as further afield at Banbury and Bicester will all generate extra traffic which will be channelled through the Parish. Whilst the Parish welcomes the proposed transport improvements in the Plan it remains unconvinced that sufficient funding exists or can be secured to deliver these improvements. Even with these changes in place the transport pressures in this area will remain. Appendix 4 provides a list of transport infrastructure improvements to support the growth proposed. Noted that whilst many of these are considered "Critical", costs/funding are to be confirmed. It is unclear whether these improvements will indeed secure the necessary funding. In addition, many of these schemes require developer funding for implementation which are clearly yet to be secured. There needs to be a much clearer link between the transport improvements and new

developments. Development should not go ahead until critical infrastructure is in place. Do not consider that Policy PR4 will achieve sustainable development, nor will it be effective in delivering the necessary improvements over the Plan.

Hampton Gay and Poyle PM - Policy PR4a is somewhat bizarre. It is clearly a requirement that the proposed development should require the delivery of affordable and sustainable transportation into Oxford. However, those of us who have lived in villages and towns north of Oxford for tens of years see no evidence yet of any such delivery. Surely it should be incumbent on the Council to demonstrate its ability to provide a better system to fit current needs prior to promising a wonderful and untested and, as yet, unplanned system that will support the requirements after the new houses have been built.

Hanwell PC - A new railway station 'between Kidlington and Begbroke is extremely unlikely to be deliverable. Plans for additional housing in North Oxford/South Kidlington should be put on hold until the Oxford to Cambridge Expressway route is settled, the East West railway is re-opened and the full extent of the expansion of Bicester is agreed, with its possible new transport infrastructure.

Wolvercote Neighbourhood Forum - Existing roads approaching the north of Oxford are already at full capacity in peak periods. Highway improvements to be effective need to be more extensive than we have experienced so far and it is unrealistic to expect that they will be implemented in the necessary time scale in the present economic climate. Even if adequate improvements are planned there will be a mis-match between the speed of development and the rate of their completion. Buses approaching from out of city Park and Ride facilities will be unlikely to cope with all the increased demand resulting from the 4,400 dwellings planned much closer to the city. The developments proposed by Cherwell District Council to the north of the city seem to ignore the fact that the majority of the employment sites are to the south east of the city. It does not make sense to build in these northerly areas, simply encouraging workers to cross the city by car. In addition, the policy does not appear to take account of the likely effect on the roads of building on the Northern Gateway site, with thousands of employees and hundreds of residents. Policy relies heavily on the implementation of the County Transport Plan. If this is not completed on time, the increase in traffic in north Oxford will just lead to even more congestion than already exists. The policy seems to ignore the fact that many people still prefer to drive their cars.

Canal & River Trust - The canal provides a direct link into Oxford. The canal towpath is an important traffic free route for walking / cycling for both leisure and utility walkers and could provide linkages between the urban areas and for access to local facilities such as schools / train stations. The towpath would also aid in providing a safe, convenient and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. The Trust would note that the towpath width is restricted and there may be structures, pinch points and narrow sections of canal towpath, such as adjacent locks, within the District which may be a challenge in terms of increased usage and integrating with other towpath users, visitor moorings and anglers.

Other comments include:

- References to the Oxford to Cambridge corridor are contradictory. The Plan supports the existing rail link (between Bicester & Oxford) & onwards (to Milton Keynes, Bedford & Cambridge) but also supports the Expressway that would be in direct competition, probably

preventing the completion of the rail link or making it extremely costly in subsidy. This is contrary to the sustainable transport policies.

- If development was concentrated along the two railway lines (e.g. Shipton Quarry), commuters could access the centre of Oxford & towns/cities further afield without using the car.
- The road network is already heavily congested. The problems will be significantly worse with the proposed developments.
- Congestion will increase problems of air pollution.
- To reduce stress, congestion and numerous accidents on the local highway systems, more housing needs to be built closer to where the jobs are so that local residents can feasibly walk, cycle or use buses to get to work.
- The A44 through Woodstock and the A4095 in Bladon are operating at peak levels of around 70 to 75%. Major planned developments will substantially increase local traffic, private and otherwise, and this has not been factored into the overall Plan. Consequently, these local highway systems will not be able to cope with or sustain themselves with the massive combined developments planned in Cherwell and West Oxfordshire.
- Improving bus services to Oxford mainly rely on Oxfordshire CC subsidies which have recently been removed from many routes leading to withdrawal of services. Even if the frequency of buses was improved, the journey time into the city will increase, as there will inevitably be more traffic on the roads. The rapid transport network that is due to be ready by 2035, is a long way from being approved, or funded, let alone built.
- No mention is made of measures to encourage people to refrain from owning cars, such as promoting and providing space for car-sharing clubs.
- The most appropriate means of achieving sustainable transport arrangements has yet to be the subject of detailed study. It may be that when the effects of a proposed development upon the local highway network are assessed it will determine that some of these measures are no longer appropriate, or indeed that other measures should be prioritised.
- The Plan fails to provide adequate infrastructure. There are no costings or new ideas. There is no evidence that these plans are deliverable
- The costs, sources and identification of funding are not shown.
- No up to date evidence of a traffic or planning assessment.
- The Plans for new transport infrastructure deal with the existing needs and do not model the impact of the additional 4,400 houses.
- Plans will cost millions of pounds and are currently unfunded.
- The Rapid Transit System will not serve Begbroke and Yarnton.
- Sandy Lane provides a valuable and well used link between Begbroke, Yarnton and Kidlington. There is no public transport option to link these villages.
- The traffic increase will compromise road safety.
- There is no way that tripling the size of a village will only lead to a 1.2% increase in traffic.
- Expanding cycleways will not be effective.
- It should be made clear that all new developments must provide a number of ULEVs and charging points and car clubs. Parking spaces in residential areas should be limited to ULEVs and visitors
- The Park and Ride is not feasible.

- The relocation of the P&R site from the Airfield to the Begbroke site should be considered.
- The planned new railway station seems to have very restricted access and no parking provision.
- The Plan does not comply with NPPF paragraphs 29 and 30 in terms of delivering sustainable transport and reducing congestion.
- The Transport Assessment is not based on any feasibility study and so is optimistic about what can be achieved.
- The current infrastructure does not support the current traffic requirements encouraging the use of 'rat runs' through all the villages.
- There are no proposals for any form of innovative car free developments.
- The evidence base has failed to sufficiently consider investment in rail/exploitation of existing rail assets despite investment in the East-West rail project. A thorough exploration of the reasonable alternatives is required.
- There has been no analysis to give any confidence that the public transport improvements will meet the extra demand and achieve a significant modal shift away from private transport.
- There is no safe way to cycle to work.
- Bus operators – general support received.
- Development should not go ahead until critical infrastructure is in place.

Officer Response

Whilst the proposals for development within the Plan undoubtedly affect a challenging area of the district in transport terms – the interface with Oxford with main transport corridors (A44/A4260) into the city; connections with the A34 and A40; congestion at the Wolvercote, Cutteslowe and Peartree roundabouts and associated air quality issues – it is the view of officers that they represent the best opportunity for maximising the use of sustainable transport, reducing the reliance on the private car, ensuring high levels of accessibility to Oxford's places of employment, its universities, its services and facilities, and developing communities that are well-connected to Oxford.

Officers with the Council's transport consultant have worked in cooperation with Oxfordshire County Council from early stages of plan preparation through regular liaison meetings, through issue specific meetings at key stages of evidence preparation which resulted on the joint commissioning of transport modelling, understanding of the plan's effect on local and strategic road network, the identification of transport mitigation measures and culminated on the joint sign-off of the Transport Assessment supporting the plan. District and County officers met with Highways England at key stages of transport evidence and plan preparation.

In cooperation with the County Council, development locations were selected based on a 'lowest transport impact' basis, appraised through an iterative stage of model testing.

The County Council's proposals for rapid transit routes and strategic cycleway improvements within the Plan's growth area, its strategy for providing Park and Ride facilities further away from the city to encourage early 'modal shift', and its desire to improve traffic movements along both the A4260 and A44, integrate well with proposals for development immediately to the north of Oxford and along

the A44 and provide clear opportunities. The aspirations of the Kidlington Masterplan SPD to improve sustainable connectivity within the wider Kidlington / Begbroke area are also informative.

Alignment with the Oxford Transport Strategy, contained within the County Council's Local Transport Plan, has been a central theme of the Plan. Highways England's view that if Green Belt development were not to come forward, land allocations elsewhere could potentially have a far more onerous impact on the highway network is illustrative of the appropriateness of the proposed strategy in transport terms, notwithstanding the highway capacity challenges that endure.

The representation from Highways England has been considered by the Council's transport consultant and discussed at a meeting attended by Highways England and the County Council.

Officers from the three authorities discussed the effect of the plan on the M40 J9, A34 and A34 junctions and agreed that the main residual issues are concentrated upon the Peartree interchange which suffers from peak traffic congestion even without growth from the Partial Review.

The Plan's concentrated focus on sustainable travel helps to minimise additional impacts and there is an understanding that implementation would need to include improvements to bus services operating through the Peartree interchange and Loop Farm roundabout. There is agreement with the highway authorities that junction 'microsimulation' work may need to be taken forward once there is greater certainty over the precise nature of development. Through the Growth Board, the Oxfordshire councils have reached an Outline Agreement with Government for an Oxfordshire Growth Deal. Subject to agreement on a required Delivery Plan, it will commit the Government to a 5 year (2018-2023) £215m funding package which includes addressing the transport infrastructure requirements of growth to 2031. This is in the context of the Oxfordshire councils committing to delivering 100,000 homes (2011-2031) in line with the need identified in the SHMA 2014. The Partial Review's sustainable transport mitigation package is included in the emerging Growth Deal under 'North Oxford All Modes Corridor Improvements'.

Officers have updated the Plan's infrastructure schedule attached to the proposed Schedule of Focused Changes and Minor Modifications. Upon approval of the schedule, it would comprise part of the proposed changes to the Plan. The updates take into account additional information provided by the County Council. It is the view of officers that the Plan's proposals represent the most sustainable approach to addressing the local highway issues. There is clear alignment with the County Council's policies and programmes as Local Highway Authority. Strategic highway schemes have been identified in the Oxfordshire Infrastructure Strategy which will ensure countywide coordination and form the basis for funding bids. Officers will continue to work closely with the County Council and Highway England to secure investment for the transport improvements including strategic funding such as from the Growth Deal and Local Growth Fund, funding from developer contributions and from the capital programmes of the relevant authorities.

The Plan, its sustainability and its deliverability do not depend on the provision of a railway halt/station. Land is safeguarded to assist with a longer term aspiration following discussions with the site promoter (site PR8) and initial exploratory discussions with the rail industry.

On more detailed matters, officers from the county and district councils are agreed that the potential closure of Sandy Lane to vehicular traffic would not affect the operation of the Strategic

Road Network, that modelling evidence shows that Langford Lane operates under capacity and could absorb displaced vehicular moments; and, that modelling shows that the A40-A44 link road (highlighted by West Oxfordshire District Council) is not required to deliver the growth in the Partial Review. Officers recommend that its potential closure, aligned with the implementation of rapid transit routes, is retained within the Plan to maximise the potential for the use of sustainable transport, to create a high quality 'green link' between Begbroke/Yarnton and Kidlington, to achieve a high quality of development within site PR8 and to assist Network Rail with the closure of the level crossing for safety reasons.

The potential closure of the Sandy Lane level crossing has been discussed with and welcomed by Network Rail. It has also been agreed to introduce a minor amendment to the Plan requiring consultation with it on the development brief for site PR8 in part to avoid the pedestrian/cycle/wheelchair use of the Yarnton Lane/Green Lane as a preferred route that might lead to more intensive use of the level crossing thereon. It has been agreed that the Plan's proposals do not materially lead to increased vehicular traffic over the crossing. Nevertheless, Network Rail wishes to explore its potential for closure. The closure of both Sandy Lane and Yarnton Lane level crossings would be of significant benefit to Network Rail in terms of health and safety, journey times and rail capacity. Overall, having reviewed all the comments submitted, officers are of the view that a change is not required to plan's strategy for transportation but that the focused changes and minor modifications would improve the final document in light of detailed comments made.

Policy PR4b – Kidlington Centre

Less than 20 comments were made in relation to this policy. These included the following representations:

Kidlington PC - The Policy is confined to addressing transport and movement issues, while the need is for far wider changes to improve the vitality, viability, scale and quality of services in the village centre. The adopted 2016 Kidlington Masterplan deals with these in more detail, but is limited to matching the restrained local growth anticipated in the adopted CDCLP. If substantial new strategic developments are encouraged in the local area, it is essential that the village centre is assisted to both protect its valuable function in the light of competing new destinations, and to genuinely secure enhancements, rather than accept them if they are offered, as the current Policy suggests.

Other comments include:

- Kidlington has a vital and thriving village centre which is important to the identity of the village. It is a crucial feature of the Kidlington Master Plan. This must be supported and protected by CDC over the impact that major new housing areas and competing commercial development will have upon the High Street. Investment will be required and there is no delivery plan specified for feeding into the Kidlington Master Plan, including ways of accessing the amount of investment needed.
- Support in principle for this policy but would point out that the Kidlington Masterplan refers, in relation to the village centre, to more than just transport but also about improving the vitality, scale and quality of services in the village. The Masterplan was written to meet the needs of the village, as it currently exists. If development takes place in Yarnton and

Begbroke then there will be potential competing centres and as there is less proposed development in Kidlington itself it is difficult to see how proposals in the Masterplan will be funded.

- There is no need to strengthen Kidlington centre through transport improvements. Kidlington is served very well by buses which travel into the centre of Oxford, Headington hospitals and Woodstock. This is not an exceptional circumstance for the development of the Green Belt.
- Concerned about the vitality and viability of Kidlington Village Centre if the proposed developments take place, in the proposals there are sites that have been identified for small local centres which will include retail units, cafes/restaurants, community buildings and opportunities for leisure facilities. With the extra retail and café units it will put a strain on existing businesses in the village. Urge Cherwell District Council to carry out a study into the impacts of the proposed developments on the vitality and viability of Kidlington Centre and to ensure that the Kidlington thrives as a village centre once the development is completed.
- It is difficult to see that this policy will achieve any of the positive investment necessary. The Policy is confined to addressing transport and movement issues, while the need will be for far wider changes to improve the vitality, viability, scale and quality of services in the village centre.

Officer Response

These comments have been noted. However, officers consider that this policy is 'sound' and supports the themes and objectives of the adopted Kidlington Masterplan SPD. No changes are proposed.

Policy PR5 – Green Infrastructure

Approximately 20 comments were made in relation to this policy. These included representations from the following:

Historic England – Welcomes the policy.

Hampton Gay and Poyle PM - Policy PR5. The phrase to deliver "a consolidated and integrated approach to green infrastructure" is a wonderful but tenuous ambition. We do not believe that CDC sees this as a key aim and we find it hard to see how it will be achieved under the current proposals

BBOWT - Welcome the inclusion of a Green Infrastructure (GI) policy to compliment the already existing and adopted Green Infrastructure policy ESD17 from the adopted Cherwell LP 2011-2031, Part 1. Concerned about the lack of a county-wide strategy to identify, protect and enhance GI networks and recommend that the Council continues to work in partnership with the other Oxfordshire Councils with a view to develop a GI strategy for Oxfordshire in the future.

Sport England - Sport England welcomes the Council's references throughout the document and policies requiring developers to include open space, outdoor sport and recreation. However, Sport England is concerned that the Council has yet to publish its evidence base in relation to playing fields and outdoor sports provision and built sports facilities.

Oxford City – Welcomes the sensitive consideration of Cutteslowe Park.

Other comments include:

- The loss of countryside and green space will damage or obliterate what are currently rich and diverse wildlife and habitats. This cannot be compensated by 'wildlife corridors' and nature reserves as the Plan proposes.
- No evidence of how net biodiversity gains and GI etc. will be provided and funded.
- Proposed development will destroy or significantly damage the landscape.
- Potential damage to the Oxford Canal Conservation Area and the biodiversity value of the canal corridor.
- Proposals will increase air pollution.
- Heritage assets will be harmed.
- North Oxford Golf Course is a bio-diverse landscape. It is needed for health and wellbeing.
- Housing allocations in the Kidlington Gap should be removed.
- There are limits to the extent to which the development sites are able to deliver GI measures, based on environmental suitability, long term viability and land ownership.
- Unnecessary duplication with the GI requirements within each strategic development policy.
- Policy wording too restrictive.
- Policy should recognise that not all trees on site are suitable for retention.

Officer Response

The comments received have been noted. Support for the policy is welcomed. Officers consider that this policy is 'sound' and no changes are proposed.

Policy PR6a – Land East of Oxford Road

Approximately 180 comments were received in relation to this policy. The vast majority raised objections. These included representations from the following:

Gosford & Water Eaton PC – Allocation should be deleted and the land retained as Green Belt. This development will result in the loss of agricultural land (48Ha) and a highly valued local landscape which is used by local residents for recreation. Adding 650 houses will lead to a substantial reduction in the gap between Oxford and Kidlington and urbanisation of Gosford and Water Eaton. It will have a major impact on transport infrastructure in particular on the already heavily congested Oxford Road. The Parish considers that traffic from this development will increase congestion further. It is not clear how the transport improvements including new bus lane (and/or cycle lane provision) can be implemented without further problems for Oxford Road residents who already suffer from congestion, delay, air pollution and vibration caused by passing lorries/buses. In the Green Belt Study (April 2017) this site was categorised as "High" in terms of harm to the Green Belt from its release for development. The PC concurs with this view and considers that it would significantly erode the gap between Kidlington and Oxford, especially in combination with removal of the Park and Ride site from the Green Belt. This would result in continuous development up to the railway/A34. This will lead towards the coalescence of Gosford/Water Eaton/Kidlington and Oxford. The area has no easily definable boundary to the east which raises further concerns about how development may be contained in the long run. Affordable housing should be available to residents of the Parish.

Kidlington PC - Development of these sites would significantly narrow the important open countryside gap between Oxford and Kidlington, effectively creating the perception that Kidlington was not a separate village community, but a suburb of Oxford. Evidence does not demonstrate that exceptional circumstances exist to justify a release from the Green Belt, where background studies confirm that both sites are of high importance to the integrity and function of the Green Belt. Would aggravate existing local congestion and air quality issues, and adversely impact on movement between Oxford and Kidlington. The open character of the agricultural land east of Oxford Road forms part of the wider landscape which provides an important setting on the approach to Oxford.

Wolvercote Neighbourhood Forum - Development here will result in a high risk of harm to the Green Belt, according to the LUC Cherwell Green Belt Study (April 2017). To prevent the coalescence of Oxford and Kidlington these sites should not be developed. One of the purposes of the Green Belt is to prevent the coalescence of settlements. Development will harm the existing views of open countryside from Cutteslowe Park. There are other possible sites that have not been given sufficient consideration. This plan is also not justified because it is likely to fail to provide for the unmet housing need. The proximity to the station makes it far more likely that unaffordable expensive homes will be built for the benefit of commuters to London. It is unlikely that development would result in a net biodiversity gain (as required under PR6a clause 11) because Green Belt land would be destroyed by development. The policy is not consistent with national Policy, as it proposes to build on Green Belt, when NPPF outlaws the use of such land to meet unmet housing need when this is accurately determined.

Historic England - The site "Land East of Oxford Road" should not be taken forward without an assessment of the significance of St Frideswide Farmhouse, the contribution of its setting to that significance, and the likely impact of proposed development on that significance.

Oxford City Council – Supports this policy. The City Council supports the analysis that the area south of the A34 is perceptually part of the city of Oxford & that the recent developments at Oxford Parkway Station & Water Eaton Park & Ride reinforce this impression. We consider that this area links more clearly & effectively as part of the urban area to the south than to the rural area beyond. In sustainability terms, the area benefits from being adjacent to existing communities, frequent public transport links into the city, local facilities & services provided in Cutteslowe, Summertown & beyond, & proximity to the planned employment opportunities at Northern Gateway. Improving these existing links & facilities to support residents of the new housing is an efficient and effective way to secure their delivery.

CPRE - Government Policy and the Public Interest both require the GB to be permanent unless truly exceptional circumstances necessitate consideration of release. Oxford unmet need is not an exceptional circumstance, firstly because it has not been defined and secondly because there are ample reasonable alternatives to accommodate it. The LUC GB study was conducted on flawed principles and should be given little weight. Cherwell have cited no other exceptional circumstances which hold any water – and their primary arguments – proximity to Oxford – is in fact a key argument for GB retention rather than release. If at some future time an Oxford “unmet need” has been shown to exist and satisfactorily quantified, and if that requires any allocation to Cherwell, there are alternatives available to the District other than releasing GB land and therefore none should be released.

BBOWT - Have some concerns that 40 dwellings/ha might not allow sufficient space for meaningful green infrastructure such as large native street tree planting within the built-up areas.

Begbroke & Yarnton Green Belt Campaign - There is no proper justification for altering the Green Belt boundaries from where they currently stand. Object to the removal of land described as PR6a, PR6b, PR7a and PR7b from the Green Belt due to the importance of these sites in maintaining the gap between the villages of Begbroke, Yarnton and Kidlington to Oxford City.

Kidlington Development Watch - While we object to any release of land in the Green Belt including the allocated sites, we have a further concern relating to the possible overall location of land for housing in the event that any or all of the allocated sites are confirmed for development in any adopted plan. PR6a, 6b, 7a, and 8, the land areas allocated specifically for residential development (i.e. not the total site areas) are approximately 50% higher than would be necessary to accommodate the stated number of houses at the net densities specified. For example the largest site (PR8) for 1950 houses at 45dpha net should require 43.3ha, whereas the allocation is for 66ha, which is over 50% larger. The definition of net density is not specified in the plan though it usually includes access roads, parking, incidental open space and play areas. There are separate allocations for schools and a local centre, so it appears that the areas allocated specifically for residential development are significantly too large. Given the desirability of this land to developers, there is a clear risk that permission could be sought for significantly higher numbers of dwellings over and above the intended provision, resulting in even greater environmental harm and pressure on infrastructure. We are therefore concerned about the provision in PR12a (para 7) that should more than 4400 houses be built this will be taken into account in meeting Cherwell's own need, which would appear to be an incentive to the Council to approve higher numbers than set out in this plan."

Other comments include:

- Inappropriate development in the Green Belt.
- Site forms a key gap separating Oxford from Kidlington (the Kidlington Gap).
- Site meets all five purposes of the Green Belt.
- Loss of attractive open farmland.
- Will seriously harm the character and setting of St Frideswide Farmhouse.
- Proposals not consistent with NPPF.
- Proposed new Green Belt boundary is not a clear, defensible, permanent boundary.
- Development will lead to urban sprawl.
- Location close to Oxford Parkway will make housing attractive to London commuters.
- Policy needs to acknowledge that connectivity between areas of Oxford is already poor.
- Key worker housing should be required.
- Developers will not deliver 'Key Delivery Requirements'.
- Traffic in North Oxford is already severe.
- Severe pressures on other services including health and education.
- Concern about impact on Cutteslowe Park.
- Loss of wildlife habitats.
- Target density should be increased.
- Cherwell Valley landscape will be compromised.
- Oxford's identity is closely linked to its size and setting in the surrounding landscape.

- Consortium strongly supportive of allocation.
- There is an obvious need for more housing in the area.

Officer Response

The many objections to the development of this site, and the comments on the proposed policy, are noted. Officers remain of the view that the proposed allocation is sustainable and deliverable in view of the evidence. Recommended focused changes include minor changes to the area of land required for primary school use and detailed clarifications and amendments in response to comments received.

Historic England has requested some minor changes to the wording of requirements relating to the historic environment in this and other site policies which are included in the proposed focused changes. It also indicated in its representation that site PR6a should not be taken forward without an assessment of the significance of St. Frideswide Farmhouse, the contribution of its setting to that significance, and the likely impact of proposed development on that significance. However following a visit to the site and further discussion, Historic England confirmed that such an assessment was not required at this stage, but requested minor rewording of point 15.

Policy 6b – Land west of Oxford Road

Over 220 comments were made in relation to this policy. The vast majority raised objections. These included representations from the following:

Gosford & Water Eaton PC - The North Oxford Golf Course comprises: “an important buffer feature on the urban edge, limiting perception of the city, and helps to maintain the gap with Kidlington.” Building 520 houses on this area will significantly reduce the gap between Kidlington and Oxford where it is already at its narrowest. The Golf Course is an extremely important leisure facility which has existed for 110 years. It is highly valued by the local community and well used. Strongly object to it being developed for houses. The Parish questions the viability and practicality of moving the Course given the considerable expense and disruption which will result. Traffic from this development will increase congestion further. It is not clear how the transport improvements including new bus lane can be implemented without further problems for Oxford Road residents who already suffer from congestion, delay, air pollution and vibration caused by passing lorries/buses. In the Green Belt Study (April 2017) this site was categorised as mostly “High” or “Moderate High” in terms of harm to the Green Belt from its release for development. Concur with view and consider that it would significantly erode the gap between Kidlington and Oxford, especially in combination with removal of the Park and Ride site from the Green Belt and also site PR3c. This would result in continuous development up to the railway/A34. This will lead towards the coalescence of Gosford/Water Eaton/Kidlington and Oxford. There is well established tree cover on the site including many TPO trees which could be impacted by this development.

Kidlington PC - This site would perform as urban extensions to Oxford, physically linked to existing communities. Development of these sites would significantly narrow the important open countryside gap between Oxford and Kidlington, effectively creating the perception that Kidlington was not a separate village community, but a suburb of Oxford. The combination of both sites, either side of the Oxford Road, currently provides a valued area of unlit open green space, and a distinct

break in development between the City and surrounding villages, along a major entrance corridor to Oxford. Evidence does not demonstrate that exceptional circumstances exist to justify a release from the Green Belt, where background studies confirm that both sites are of high importance to the integrity and function of the Green Belt. (See 2015 and 2017 Green Belt Studies) Development on either or both sites would aggravate existing local congestion and air quality issues, and adversely impact on movement between Oxford and Kidlington. The landscape of the Golf Course is manmade, but long established, with significant tree belts and groups. It is unlikely to be able to preserve these features unless development is restricted to a low density and larger dwellings. As a result, there would be an inefficient use of an important large area, and potential viability difficulties in accommodating 50% affordable housing. The net benefits do not outweigh the substantial harm to local character. The Golf Course is also a local recreation facility, and KPC consider that its loss is unlikely to be offset by a new Golf Course on a significantly smaller site at Frieze Farm. Development on this site conflicts not only with NPPG Green Belt Policy, but also with paragraph 74 of the NPPG, which seeks to prevent the loss of recreation facilities. Indeed, site owners/promoters have recently made a presentation proposing 600 houses on the Frieze Farm site, and have no apparent intention of creating a new Golf Course.

Wolvercote Neighbourhood Forum - Building on the Green Belt is not sustainable. Development here will result in a high risk of harm to the Green Belt, according to the LUC Cherwell Green Belt Study (April 2017). To prevent the coalescence of Oxford and Kidlington these sites should not be developed. One of the purposes of the Green Belt is to prevent the coalescence of settlements. Development will harm the existing views of open countryside from Cutteslowe Park. If the North Oxford Golf Course is to be relocated it will take some years to develop a similar mature natural environment. In the meantime the proposed relocation will remove a recreational facility also valued for its contribution to biodiversity. There are other possible sites that have not been given sufficient consideration. This plan is also not justified because it is likely to fail to provide for the unmet housing need. The proximity to the station makes it far more likely that unaffordable expensive homes will be built for the benefit of commuters to London. It is unlikely that development would result in a net biodiversity gain (as required under PR6a clause 11) because Green Belt land would be destroyed by development. The policy is not consistent with national policy, as it proposes to build on Green Belt, when NPPF outlaws the use of such land to meet unmet housing need when this is accurately determined.

Oxford City Council – Supports this allocation. The City Council supports the analysis that the area south of the A34 is perceptually part of the city of Oxford & that the recent developments at Oxford Parkway Station & Water Eaton Park & Ride reinforce this impression. We consider that this area links more clearly & effectively as part of the urban area to the south than to the rural area beyond. In sustainability terms, the area benefits from being adjacent to existing communities, frequent public transport links into the city, local facilities & services provided in Cutteslowe, Summertown & beyond, & proximity to the planned employment opportunities at Northern Gateway. Improving these existing links & facilities to support residents of the new housing is an efficient and effective way to secure their delivery. A higher housing density may be more appropriate.

CPRE - Government Policy and the Public Interest both require the GB to be permanent unless truly exceptional circumstances necessitate consideration of release. Oxford unmet need is not an exceptional circumstance, firstly because it has not been defined and secondly because there are

ample reasonable alternatives to accommodate it. The LUC GB study was conducted on flawed principles and should be given little weight. Cherwell have cited no other exceptional circumstances which hold any water – and their primary arguments – proximity to Oxford – is in fact a key argument for GB retention rather than release. If at some future time an Oxford “unmet need” has been shown to exist and satisfactorily quantified, and if that requires any allocation to Cherwell, there are alternatives available to the District other than releasing GB land and therefore none should be released.

Begbroke & Yarnton Green Belt Campaign - There is no proper justification for altering the Green Belt boundaries from where they currently stand. Object to the removal of land described as PR6a, PR6b, PR7a and PR7b from the Green Belt due to the importance of these sites in maintaining the gap between the villages of Begbroke, Yarnton and Kidlington to Oxford City.

Kidlington Development Watch - While we object to any release of land in the Green Belt including the allocated sites, we have a further concern relating to the possible overall location of land for housing in the event that any or all of the allocated sites are confirmed for development in any adopted plan. PR6a, 6b, 7a, and 8, the land areas allocated specifically for residential development (i.e. not the total site areas) are approximately 50% higher than would be necessary to accommodate the stated number of houses at the net densities specified. For example the largest site (PR8) for 1950 houses at 45dpha net should require 43.3ha; whereas the allocation is for 66ha, over 50% larger. The definition of net density is not specified in the plan though it usually includes access roads, parking, incidental open space and play areas. There are separate allocations for schools and a local centre, so it appears that the areas allocated specifically for residential development are significantly too large. Given the desirability of this land to developers, there is a clear risk that permission could be sought for significantly higher numbers of dwellings over and above the intended provision, resulting in even greater environmental harm and pressure on infrastructure. We are therefore concerned about the provision in PR12a (para 7) that should more than 4400 houses be built this will be taken into account in meeting Cherwell’s own need, which would appear to be an incentive to the Council to approve higher numbers than set out in this plan."

Other comments include:

- Inappropriate development in the Green Belt.
- Site forms a key gap separating Oxford from Kidlington (the Kidlington Gap).
- Kidlington Gap should be protected to prevent urban sprawl and maintain village identities.
- Site meets all five purposes of the Green Belt.
- Proposals will result in the loss of the North Oxford Golf Course which is a valuable recreation facility.
- Will seriously harm the character and setting of St Frideswide Farmhouse.
- Proposals not consistent with NPPF.
- Proposed new Green Belt boundary is not a clear, defensible, permanent boundary.
- Development will lead to urban sprawl.
- Location close to Oxford Parkway will make housing attractive to London commuters.
- Policy needs to acknowledge that connectivity between areas of Oxford is already poor.
- Key worker housing should be required.
- Developers will not deliver ‘Key Delivery Requirements’.

- Traffic in North Oxford is already severe.
- Severe pressures on other services including health and education.
- Proposed relocation of golf course to Frieze farm is unviable.
- Frieze Farm should be developed for housing.
- The Frieze Farm site is too small for a replacement golf course.
- Loss of wildlife habitats.
- Target density should be increased.
- Support for allocation.
- Oxford's identity is closely linked to its size and setting in the surrounding landscape.
- Consortium strongly supportive of allocation.
- There is an obvious need for more housing in the area.

Officer Response

The many objections to the development of this historic recreation facility with its mature landscape are noted. The comments on the proposed policy are acknowledged. During the consultation period, the Leader of the Council, with Council officers, met a group of members of the North Oxford Golf Club to hear their concerns. In the light of evidence, officers remain of the view that the suitability of this site for meeting Oxford's housing needs far outweighs the loss of the golf course and that there remains potential to provide a replacement facility on a comparably sized site at Frieze Farm (Policy PR6c). Recommended focused changes include detailed clarifications and amendments in response to comments received.

The Proposed Submission Plan's reference to a lower density of development on land to the west of Oxford Road reflects its well-treed character. However, in the context of other comments received, it is recommended in the focused changes to remove reference to prescribed densities in all site policies in view of the required development brief process and to avoid misinterpretation in light of the different circumstances for each site.

Policy PR6c – Land at Frieze Farm

Approximately 70 comments were made in relation to this policy. These included representations from the following:

Gosford & Water Eaton PC - the Parish Council is opposed to development on the North Oxford Golf Course and therefore to a replacement course being provided on this site. There is very little detail provided on this proposal which is of major concern. Indeed, the size of the site is not stated and there is no evidence provided to confirm that the site is large enough or suitable for a replacement course. It is not clear how the site would be accessed or what constraints exist to influence any future development brief. Whilst the Parish is opposed to the development of Green Belt, if development does have to go ahead within the Parish then we suggest that further consideration could be given to the suitability of Frieze Farm for housing. The site could link to the North Oxford Gateway and to existing road infrastructure. It could also help support the underused Stratfield Brake recreational facility.

Kidlington PC - Consider that the suggested use of this land as a replacement high quality rural character Golf Course is unrealistic, as the site is too small. It is also a fairly featureless open parcel

of land, where formal golf course development would require years of maturity in planting to deliver a scheme compatible with the open character of the Green Belt. The site remains in the Green Belt, and this is strongly supported. If the site was removed from the Green Belt under pressure from other participants/site owners, once the idea of a new golf course is abandoned, alternative development could follow under the provisions of Policy PR12b. Indeed, site promoters have recently publicised a proposal for a 600 unit housing scheme on the site, and appear to have no interest in providing a new Golf Course. This proposal for a golf course appears to be ill-founded. The location of this site means that it would be a freestanding housing development, integrated with neither Oxford nor Kidlington, and probably of insufficient scale to fund on site community provision. This would be an unsustainable form of development, encouraging travel to essential infrastructure such as schools, contrary to the spatial strategy of the adopted Local Plan. The retention of Green Belt designation is supported.

Historic England - Policy PR6c should include a requirement for the retention of the Grade II listed Frieze Farmhouse and an appropriate sensitive setting in any golf course proposal.

Turnberry on behalf of Exeter College - The allocation of site PR6c for the potential construction of a golf course, should this be required as a result of the development of Land to the West of Oxford Road under Policy PR6b, is not justified by the evidence base and is an inefficient use of a sustainably-located parcel of land, which is well-related to Oxford. The site has the capacity to provide for 800 new homes.

Other comments include:

- The farmland, featureless and surrounded by pylons, is unsuitable for a golf course.
- The current owners of the Frieze Farm have not given their approval to have the club relocated there.
- The relocation is unrealistic and unviable.
- It is not clear how this relocation will be funded.
- The site is too small for a replacement golf course.
- Landowners want to develop the site for housing.
- Support for retention of the site in the Green Belt.
- Proposals will significantly alter the character of the landscape.
- The site should be allocated for housing.

Officer Response

The many objections to the potential development of this site for a replacement golf course are noted including comments that it is not suitable for such a facility, and on the proposed policy. The site is not considered to be the optimum size for the development of a new 18 hole course, nor does it have the advantage of the mature landscape that has been created at the existing north Oxford course. However, at only about 2 hectares smaller than the existing course, and being situated very close to the existing course, the site remains to be regarded as a reasonable option for a replacement golf facility, should this be necessary to meet local needs. Officers have considered the deliverability of the site from a land use perspective and are of the view that the proposed reservation of land remains appropriate. In response to comments made, focused changes are

recommended to Policy PR6c to insert criteria for considering potential applications for planning permission, consistent with the approach taken for other site policies.

Policy PR7a – Land South East of Kidlington

Over 100 comments were made in relation to this policy. The majority raised objections. These included representations from the following:

Gosford & Water Eaton PC - The development of this area will result in the loss of 11 hectares of Green Belt land which forms an important part of the gap between Kidlington and Oxford. Building 230 houses in this location will result in a weakening of this gap. The Parish Council objects to the development of this land. In total 1410 dwellings are proposed in the Parish. 230 of these are on this site. In our view this will add to the existing traffic problems which exist and further add to congestion and delay. There is no scope for extra traffic on Water Eaton Lane and there should be no vehicle access onto it from any development. In the Green Belt Study (April 2017) the majority of this site was categorised as partly “High” and with the remainder as “Moderate” in terms of harm to the Green Belt from its release for development. Development would significantly erode the gap between Kidlington and Oxford, especially in combination with removal of the Park and Ride site from the Green Belt, site PR3c and allocations PR6b and PR6a. This would leave a very small gap comprising the southern part of PR7a between Kidlington and Oxford. This will lead towards the coalescence of Gosford/Water Eaton/Kidlington and Oxford. The overflow gravesite from St Mary’s Church is situated very closely to this site with an area built in for expansion. However, any new development in Kidlington and Gosford & Water Eaton is not included in the current growth plan. Agree that additional space needs to be provided in this area. Suggest additional space should be reserved here, in the form of allotments, to be ready for future need.

Kidlington PC - Considers that development on this site could reasonably be considered as an extension to Kidlington, securing a permanent green boundary. While its removal from the Green Belt is regrettable, if justified as exceptional circumstances by PR1, its release could bring long term benefits, offsetting the loss of Green Belt land with a well-integrated village extension of modest scale, compatible with the character of Kidlington. However, the policy needs to be amended to require the footbridge link as described in P 5.96. This site and others around Kidlington including PR7b (Stratfield Farm) should also be required to contribute to improved access arrangements for Stratfield Brake, which have long been identified as unsatisfactory, necessitating longer journeys along congested roads. A new spur to provide access direct from the roundabout is recommended. Otherwise, there is general support for this allocation.

West Oxfordshire DC – Request a review of the proposed densities and the resulting site capacities of the sites to be released from the GB in order to ensure that efficient use is made of this scarce land resource.

Oxford City Council - Supports the analysis that there is a close relationship between Kidlington & Oxford & that new homes to the south of the town would be well related to Oxford & help provide for the needs of the city. We agree that is possible to develop to the south of the town whilst maintaining an important GB gap between the two settlements & maintaining the character of Kidlington. Delivery of good public transport, cycle & pedestrian links to the transport hubs (and

thereafter on into Oxford) are essential & we welcome the provision for these in the proposed policies.

Begbroke & Yarnton Green Belt Campaign - There is no proper justification for altering the Green Belt boundaries from where they currently stand. Object to the removal of land described as PR6a, PR6b, PR7a and PR7b from the Green Belt due to the importance of these sites in maintaining the gap between the villages of Begbroke, Yarnton and Kidlington to Oxford City.

Kidlington Development Watch - While we object to any release of land in the Green Belt including the allocated sites, we have a further concern relating to the possible overall location of land for housing in the event that any or all of the allocated sites are confirmed for development in any adopted plan. PR6a, 6b, 7a, and 8, the land areas allocated specifically for residential development (i.e. not the total site areas) are approximately 50% higher than would be necessary to accommodate the stated number of houses at the net densities specified. For example the largest site (PR8) for 1950 houses at 45dpha net should require 43.3ha. Whereas the allocation is for 66ha, over 50% larger. The definition of net density is not specified in the plan though it usually includes access roads, parking, incidental open space and play areas. There are separate allocations for schools and a local centre, so it appears that the areas allocated specifically for residential development are significantly too large. Given the desirability of this land to developers, there is a clear risk that permission could be sought for significantly higher numbers of dwellings over and above the intended provision, resulting in even greater environmental harm and pressure on infrastructure. We are therefore concerned about the provision in PR12a (para 7) that should more than 4400 houses be built this will be taken into account in meeting Cherwell's own need, which would appear to be an incentive to the Council to approve higher numbers than set out in this plan."

Other comments include:

- Proposals not in accordance with the NPPF.
- Exceptional circumstances for development in the Green Belt have not been demonstrated.
- Site contributes to purposes of the Green Belt.
- Given proximity to Oxford Parkway the housing will be attractive to London commuters.
- Housing unlikely to be affordable for local residents.
- Traffic congestion already a problem.
- No scope for extra traffic on Water Eaton Lane.
- Bicester Road already congested.
- Education, health and other facilities already over stretched.
- Damage to countryside, wildlife and biodiversity.
- Problems with surface water run-off and flooding.
- Land is attractive open farmland that separates Water Eaton from Kidlington.
- Over development and over allocation of dwellings in one parish – Gosford and Water Eaton.
- Water Eaton Lane is well used by walkers and cyclists.
- Location of sports facilities next to main roads is unsafe.
- Loss of wildlife.
- Land subject to flooding.
- Problems with air pollution.

- High density housing and noisy sports pitches would be inappropriate near the cemetery.
- The level of affordable housing required is unviable.
- Greater flexibility is required in the policy. Many of the requirements should be removed and addressed through validation requirements and s106 agreements.
- Site is preferable to the North Oxford sites.
- Site could be extended to accommodate more houses.
- Site should be extended to include Gosford Farm.

Officer Response

The objections to the development of this site, and the comments on the proposed policy, are noted. Officers remain of the view that the proposed allocation is sustainable and deliverable in view of the evidence. Recommended focused changes include detailed clarifications and amendments in response to comments received

Policy PR7b – Land at Stratfield Farm

Approximately 70 comments were made in relation to this policy. The majority raised objections. These included representations from the following:

Kidlington PC - Concurs with the Plan on this Policy, and considers that development on this site could reasonably be considered as an extension to Kidlington, securing a permanent green boundary. While its removal from the Green Belt is regrettable and only to be encouraged if exceptional circumstances are demonstrated, its release could bring long term benefits, offsetting the loss of Green Belt land with a well-integrated village extension of modest scale, compatible with the character of Kidlington. This site and others around Kidlington including PR7a (Land south-east of Kidlington) should also be required to contribute to improved access arrangements for Stratfield Brake, which have long been identified as unsatisfactory, necessitating longer journeys along congested roads by local users of the facility. A new spur to provide access direct from the roundabout is recommended. Otherwise, general support for this allocation.

West Oxfordshire DC – Request review of the proposed densities and the resulting site capacities of the sites to be released from the GB in order to ensure that efficient use is made of this scarce land resource.

Oxfordshire County Council – Two vehicular access points are not necessary for a development of this size. Pedestrian access to the adjacent residential area should be secured.

Oxford City Council - Supports the analysis that there is a close relationship between Kidlington & Oxford & that new homes to the south of the town would be well related to Oxford & help provide for the needs of the city. We agree that it is possible to develop to the south of the town whilst maintaining an important GB gap between the two settlements & maintaining the character of Kidlington. Delivery of good public transport, cycle & pedestrian links to the transport hubs (and thereafter on into Oxford) are essential & we welcome the provision for these in the proposed policies.

Begbroke & Yarnton Green Belt Campaign - There is no proper justification for altering the Green Belt boundaries from where they currently stand. Object to the removal of land described as PR6a,

PR6b, PR7a and PR7b from the Green Belt due to the importance of these sites in maintaining the gap between the villages of Begbroke, Yarnton and Kidlington to Oxford City.

Other comments include:

- Loss of Green Belt.
- Exceptional circumstances for development in the Green Belt have not been demonstrated.
- Contrary to NPPF.
- Existing road network already congested.
- Existing local facilities are already overstretched.
- Given proximity to Oxford Parkway the housing will attract London commuters.
- Existing infrastructure and facilities are already overstretched.
- Would destroy an essential wildlife corridor.
- Objection to vehicular access to Croxford Gardens.
- Light pollution.
- Air pollution.
- Impact on precious wildlife habitats and biodiversity.
- Kidlington roundabout grid-locked during rush hour.
- Flooding problems.
- Site more appropriate for additional recreation facilities.
- Site could accommodate up to 175 homes with listed Stratfield Farmhouse developed for retirement living accommodation.
- Support allocation as a modest extension to Kidlington.
- Site should be required to contribute to improved access arrangements for Stratfield Brake.

Officer Response

The objections to the development of this site, and the comments on the proposed policy, are noted. Officers remain of the view that the proposed allocation is sustainable and deliverable in view of the evidence. Recommended focused changes include detailed clarifications and amendments in response to comments received.

Policy PR8- Land East of the A44

Approximately 200 comments were made in relation to this policy. The vast majority raised objections. These included representations from the following:

Begbroke PC – Strong objection. Site will remove approximately 52% of Green Belt in Begbroke and Yarnton. Our residents do not want organisations or other landowners with vested interests to destroy our pleasant environment to satisfy their own interests. Provision of appropriate facilities for outdoor sport is cynically included to build the development case. This is an exception detailed in National Planning Policy. Begbroke -There is a clear boundary already as shown in associated photograph. This proposal takes development up to FP 7.

Yarnton PC - This site is wholly within Oxford GB. Cherwell Local Plan 2011-2031 Policy ESD 14 (p 114) seeks to prevent the coalescence of settlements & has a strong role in preventing coalescence of Yarnton/Begbroke/Kidlington. PR8 has been titled 'Begbroke' despite the bulk of developments

lying in Yarnton parish. Just where the separation of Yarnton and Begbroke would be is not obvious. This despite Partial Review page 118, para 5.110, point 5 stating 'the necessity to retain the separate identities of Yarnton/Begbroke/Kidlington'. PR8 is not consistent with National Policy & thus unsound. Cherwell Local Plan 2011-2031 Policy Villages 1 (p 246) categorises Yarnton & Begbroke as Category A villages. PR8 is in contradiction with Policy Villages 1. The closure of Sandy Lane: OCC recognises this as an alternative route to A44 & A4260. It is important enough to be salted in winter. It is a vital link between Kidlington/Yarnton. No provision for an alternative, thus it is not justified and unsound.

Kidlington PC - This huge development proposed will have a major adverse impact on the separate identity of Kidlington, which has led the approach in the development of the Adopted Kidlington Masterplan and is confirmed as important in the adopted Cherwell Local Plan. Cherwell Local Plan 2011-2031 Policy ESD 14 aims to prevent the coalescence of settlements and has a strong role in preventing the coalescence of Yarnton, Begbroke and Kidlington. It will also eradicate the open landscape character of the setting of both Begbroke and Kidlington, and reduce to a meaningless scale the Green Belt in this area. The parcels of land to be developed include land which is rated as of high importance in the Green Belt Studies, where in principle new development is unacceptable. The minimal separation distance between Kidlington and the expanded Begbroke will not prevent intervisibility and a perception of coalescence, contrary to the clear objectives of the adopted CDCLP. There is substantial concern that the development would neither be well integrated with Kidlington, or constitute a genuinely free standing village, due to proximity and intervisibility. The proposed scheme is of a scale which warrants its own new centre, but is so proximate to Kidlington Village Centre that it will also act as a competitor in providing local services, and thus undermine the published commitment to investment in this established centre. This matter does not appear to have been considered in developing the strategy. CDC is asked to undertake an urgent assessment of the impact of this substantial allocation on the vitality and viability of, and improvement strategy for, Kidlington Village Centre. A Policy should be developed which promotes and secures investment in the Village Centre if the scheme goes ahead, and this needs to be reflected in the Key Requirements list in the Policy. KPC has concerns about the proposed closure of Sandy Lane. This currently provides a much valued westward link from Kidlington to Begbroke, linking the communities. It is appreciated that if kept open it could provide an undesirable rat-run for traffic from the new development, adding to traffic congestion in Kidlington, but it currently enables Begbroke residents to make use of the Village Centre amenities, and thus support the well-being of the village. A more detailed assessment of the benefits and problems of the proposed closure is required, and mitigation measures developed and required as part of the implementation strategy. If adopted, the Policy should be extended to require substantial investment in offsite transport infrastructure, by reference to Policy PR4a. Without this, it is unlikely to be sustainable and will add to local congestion. Strongly object to PR8 allocation.

West Oxfordshire DC - Exceptional circumstances have been demonstrated to justify the release of sites from the GB, including sites for housing to help meet Oxford City's unmet housing need. It is clear from the evidence base for Cherwell's proposed submission plan and from the Oxfordshire Growth Board evidence base that the release of sites from the GB is necessary to deliver the scale of housing required in a sustainable manner. However, there is a need to make efficient use of land released from the GB for housing purposes. Some of the proposed densities on sites released from the GB do not appear to make efficient use of this land despite their close proximity to Oxford and to

sustainable transport infrastructure and services. By increasing the density on some of the GB sites and by developing the site covered by Policy PR3a Cherwell DC would achieve their target of meeting Oxford City's unmet housing need without requiring development at Woodstock South East (Policy PR10).

Oxfordshire County Council - To provide sufficient benefits to support a business case and be sufficiently attractive to users, the train service will need to operate at least every half hour throughout the day, and have the potential to connect to destinations other than central Oxford, for example the proposed Cowley Branch line. A frequent shuttle service between Begbroke and Oxford is likely to have a bigger impact upon services to and from the North Cotswolds Line than on other lines. Further work will be required to identify how a station would be served, and to evaluate both the operational and commercial viability of a train service. Importantly it needs to prove that there will be no detrimental impact on the wider rail network, and that it is subsidy neutral (i.e. that it will generate enough revenue to offset the cost of providing the service and the station). A station needs to be easy to reach from within the development site and surrounding area. It should have the following minimum facilities: a platform of sufficient length for the longest train likely to use the station, a small building (with ticket machines, toilets, retail outlet/waiting area and a staff office), bus stop, secure cycle storage, pedestrian footways, drop-off area, taxi rank and a car park with around 100 spaces, including provision for disabled parking.

Level Crossings - Development on land east of the A44 (Policy PR8) will have a substantial effect on the risk at Sandy Lane level crossing, which is already recognised as an incident 'hotspot'. An increase in usage of the level crossing will have safety implications and, in the interest of public safety, the level crossing should be stopped up prior to development commencing.

Natural England - Note that the policy requires investigation at the planning application stage of any above or below ground hydrological connectivity between the Rowel Brook and Rushy Meadows SSSI. Further information regarding potential hydrological impacts on Rushy Meadows SSSI is needed to inform the selection of this site allocation. Without this information the plan is unsound with regards to this allocation; evidence that the quantum of development allocated can take place here without a significant impact on the SSSI is needed in order to demonstrate that development in this location is justified.

BBOWT - This large allocation adjoins a number of nature conservation designations including Rushy Meadows SSSI (Site of Special Scientific Interest) and the Conservation Target Area along the Oxford Canal. Welcome the provision and aspiration for a Local Nature Reserve (LNR) to mitigate adverse impacts on Rushy Meadows SSSI. The LNR has the potential to deliver ecological benefits but it is one of two main recreational open spaces in the development and will therefore be subject to a lot of recreational pressure. Much will depend on the design and management of this site but we remain concerned that the area might not be able to fully mitigate indirect impacts on the SSSI. It will be important that the development provides sufficient attractive open space and footpaths for informal recreation (including dog walking) in addition to nature conservation areas to limit the pressure on valuable habitats. Also feel that development densities of 45 dwellings per hectare are likely to offer limited opportunities for Green Infrastructure within the built-up areas.

Begbroke & Yarnton Green Belt Campaign - There is no proper justification for altering the Green Belt boundaries from where they currently stand. On a local level, they particularly object to the

removal of the land described as PR8 and PR9 from the Green Belt due to the significant detrimental impact of that removal on the villages and villagers of Begbroke and Yarnton.

Kidlington Development Watch - While we object to any release of land in the Green Belt including the allocated sites, we have a further concern relating to the possible overall location of land for housing in the event that any or all of the allocated sites are confirmed for development in any adopted plan. PR6a, 6b, 7a, and 8, the land areas allocated specifically for residential development (i.e. not the total site areas) are approximately 50% higher than would be necessary to accommodate the stated number of houses at the net densities specified. For example the largest site (PR8) for 1950 houses at 45dpha net should require 43.3ha; whereas the allocation is for 66ha, which is over 50% larger. The definition of net density is not specified in the plan though it usually includes access roads, parking, incidental open space and play areas. There are separate allocations for schools and a local centre, so it appears that the areas allocated specifically for residential development are significantly too large. Given the desirability of this land to developers, there is a clear risk that permission could be sought for significantly higher numbers of dwellings over and above the intended provision, resulting in even greater environmental harm and pressure on infrastructure. We are therefore concerned about the provision in PR12a (para 7) that should more than 4400 houses be built this will be taken into account in meeting Cherwell's own need, which would appear to be an incentive to the Council to approve higher numbers than set out in this plan."

Other comments include:

- Loss of Green Belt.
- Exceptional circumstances have not been demonstrated for development in the Green Belt.
- Not consistent with NPPF.
- Increased traffic congestion.
- Crossing A44 is already challenging.
- Strong objection to closure of Sandy Lane.
- Pinch points along A44 make it impossible to create a dedicated bus lane to Peartree Roundabout.
- A44 will not cope with increased traffic.
- Cycling will become more dangerous.
- Yarnton Lane should be upgraded as a pedestrian/cycle route.
- There are problems of flooding in the area.
- Will lead to the coalescence of Yarnton, Begbroke and Kidlington.
- Will be urban sprawl.
- Will destroy way of life.
- Developments will more than double the sizes of both Yarnton and Begbroke.
- Begbroke, Yarnton and Kidlington will become a big suburb of Oxford.
- Increases in pollution.
- Infrastructure will not cope with more population.
- Adverse impacts on heritage assets.
- 'Affordable housing' will not be truly affordable.
- Councils lack power to commit developers to the level of affordable housing that is needed.

- Plan is biased towards Oxford University who stand to make significant financial gains, with no regard for the local community.
- Ignores local historic parish boundaries.
- Consideration of education facilities should be independent of Oxford University.
- Contrary to adopted Cherwell Local Plan Part 1 which categorises Yarnton and Begbroke as category A villages.
- Scale of housing proposed is both excessive and disproportionate to the current environment.
- Growth should be evenly distributed across the District.
- The Kidlington Masterplan SPD seeks to strengthen the separate identity of Kidlington.
- Destruction of landscape.
- Existing services and facilities will not be able to cope with extra population.
- Landfill site should be deleted from the allocation.
- The infrastructure plans are an afterthought.
- Need to protect the green corridor of the Rowel Brook and ancient green Begbroke Lane and Rushy Meadows SSSI.
- No development should proceed until appropriate transport infrastructure has been costed, funded and firmly programmed.

Officer Response

The many objections to the development of this site, and the comments on the proposed policy, are noted. Officers remain of the view that the proposed allocation is sustainable and deliverable in view of the evidence. Recommended changes include clarification on required provision for education, and, in response to comments from Natural England, that the Biodiversity Impact Assessment required by Policy PR8 be informed by a hydrogeological risk assessment to ensure the protection of Rushy Meadows Site of Special Scientific Interest (SSSI).

Proposed Policy PR8 contained a requirement for a Biodiversity Impact Assessment supporting a planning application to include investigation of any above or below ground hydrological connectivity between Rowel Brook and Rushy Meadows SSSI. However, Natural England's representation advised that further information regarding potential hydrological impacts on the SSSI was needed at this stage to ensure that the quantum of development allocated was deliverable without a significant impact.

A Hydrological and Hydrogeological Study (evidence doc. PR80) was therefore commissioned by officers which concluded:

"Although a potential hydrogeological connection via superficial sands and gravels is assumed to be present between Rushy Meadows SSSI and the proposed PR8 development land to the south, significant hydrological and hydrogeological linkages were not identified. As a consequence, adverse impacts to Rushy Meadows SSSI as a consequence of the proposed development are considered Negligible."

The study indicates that whilst it is possible that groundwater abstraction could lower groundwater levels within the SSSI, the extent of the impact would be dependent upon the nature of the

abstraction or dewatering activity. The consideration of mitigation measures to control dewatering operations during construction was therefore recommended. Although this would be determined through the planning application process, a proposed focused change clarifies the supporting information required

Other detailed clarifications and amendments are also recommended for Policy PR8 in response to comments received.

Policy PR9 – Land West of Yarnton

Approximately 120 comments were made in relation to this policy. The majority raised objections. These included representations from the following:

Begbroke PC – Site PR9 will remove approximately 16% of the Green Belt in the parish. Our residents do not want organisations or other landowners with vested interests to destroy our pleasant environment to satisfy their own interests. It will have a devastating effect on the Green Belt.

Yarnton PC - Land West of A44 (Yarnton) lies wholly within Oxford GB. Cherwell Local Plan 2011-2031 Policy ESD 14 seeks to safeguard the countryside from encroachment. Policy ESD 13 seeks to secure the enhancement of the character & appearance of the landscape particularly in urban fringe locations. Policy PR 9 is not consistent with National policy and thus is UNSOUND. Policy Villages 1 categorises Yarnton as a Category A village. This is only minor development, infilling or conversion is allowable in or alongside this settlement. PR9 is in complete contradiction with this policy and the plan is inconsistent & thus is unsound. The separation of PR8 & PR9 is the width of the A44, hardly the separation of settlements required by the LP, Policy ESD14 which seeks to separate Yarnton/Begbroke identities. PR9 is not consistent with national policy & thus is unsound.

West Oxfordshire DC - Exceptional circumstances have been demonstrated to justify the release of sites from the GB, including sites for housing to help meet Oxford City's unmet housing need. It is clear from the evidence base for Cherwell's proposed submission plan and from the Oxfordshire Growth Board evidence base that the release of sites from the GB is necessary to deliver the scale of housing required in a sustainable manner. However, there is a need to make efficient use of land released from the GB for housing purposes. Some of the proposed densities on sites released from the GB do not appear to make efficient use of this land despite their close proximity to Oxford and to sustainable transport infrastructure and services. By increasing the density on some of the GB sites and by developing the site covered by Policy PR3a Cherwell DC would achieve their target of meeting Oxford City's unmet housing need without requiring development at Woodstock South East (Policy PR10).

Oxford City Council - Supports the allocation of sites at Begbroke, Yarnton & Woodstock. Our comments on the details of these policies are more brief as the physical links with the city are more limited (although the economic links with Begbroke & the University of Oxford as part of the 'Knowledge Spine' are clear and strong), however we welcome the delivery of sustainable transport links into neighbouring communities & onwards into Oxford to provide access to employment, services & facilities.

BBOWT - This site allocation adjoins Begbroke Wood Ancient Woodland and LWS. Pleased to see that the allocation seeks a considerable buffer to the Ancient Woodland as well as large areas of

public access land, which we assume will be used for informal recreation. Adverse impacts on Begbroke Wood might potentially occur but will depend on the design and management of the woodland and open access land. Welcome these proposals but thoughts should be given whether the open access land (or parts of it) could also be improved for biodiversity.

Begbroke & Yarnton Green Belt Campaign - There is no proper justification for altering the Green Belt boundaries from where they currently stand. On a local level, they particularly object to the removal of the land described as PR8 and PR9 from the Green Belt due to the significant detrimental impact of that removal on the villages and villagers of Begbroke and Yarnton.

Other comments include:

- Loss of Green Belt.
- Exceptional circumstances have not been demonstrated for development in the Green Belt.
- Not consistent with NPPF.
- Increased traffic congestion.
- Crossing A44 is already challenging.
- Strong objection to closure of Sandy Lane.
- Pinch points along A44 make it impossible to create a dedicated bus lane to Peartree Roundabout.
- A44 will not cope with increased traffic.
- Rutten Lane is already a well-used cut through from Cassington Road to the A44 resulting in road safety problems.
- Cycling will become more dangerous.
- There are problems of flooding in the area.
- Will lead to the coalescence of Yarnton, Begbroke and Kidlington.
- Will be urban sprawl.
- Will be ribbon development along A44.
- Will destroy way of life.
- Developments will more than double the sizes of both Yarnton and Begbroke.
- Begbroke, Yarnton and Kidlington will become a big suburb of Oxford.
- Increases in pollution.
- Infrastructure will not cope with more population.
- Adverse impacts on heritage assets.
- 'Affordable housing' will not be truly affordable
- The proposed expansion to William Fletcher School pays no regard to present parking or additional traffic flow this will create.
- The proposed release of GB for William Fletcher Primary School is problematic and fails to give consideration to the practicalities of school expansion on the existing site or to the safety of the children.
- Contrary to policies in the adopted Cherwell Local Plan.
- Development will bring no benefits to Yarnton.
- Area rich in wildlife.
- Will overwhelm local sewerage system.

- Developable area should be increased to take account of the need for connecting infrastructure and mitigation requirements.

Officer Response

The many objections to the development of this site, and the comments on the proposed policy, are noted. Officers remain of the view that the proposed allocation is sustainable and deliverable in view of the evidence. However, it is recommended that the total number of homes proposed is reduced from 530 homes to 440 homes to improve the deliverability of the site and achieve a high quality of design in the context of a representation from the site promoter. Other recommended focused changes include detailed clarifications and amendments in response to comments received.

Policy PR10 – Land South East of Woodstock

Approximately 40 comments were made on this policy. The majority raised objections. These included representations from the following:

Historic England - The site "Land South East of Woodstock" contains the "Blenheim Villa", a scheduled monument comprising a Roman villa and associated field system 200m north east of Little Cote. This site should not be allocated for development until an archaeological assessment has been undertaken and ascertained the extent and significance of archaeological remains on the site as a whole, thus identifying if development is acceptable on this site and, if so, over what area.

Welcomes the reference to the Blenheim Palace World Heritage Site and Grade I Registered Park in paragraph 5.129, its Outstanding Universal Value in paragraph 134 and the Blenheim Villa Scheduled Monument in paragraphs 134 and 135, as part of the positive strategy for conserving and enjoying, and clear strategy for enhancing, the historic environment as required by the National Planning Policy Framework.

West Oxfordshire DC - Concern over the impact of the proposed Woodstock urban extension, including the potential adverse effects on the settings of important heritage assets. It is not clear that Cherwell have appropriately considered the cumulative impact of the proposed urban extension in combination with the proposals in the proposed West Oxfordshire Local Plan. The proposed West Oxfordshire Local Plan proposes 670 new homes on urban extension to Woodstock, including 300 homes to the immediate west of the Cherwell site which now have planning approval subject to a Section 106 agreement. The cumulative effects that need to be considered include the impact on the setting of the Blenheim Palace World Heritage Site. A key issue to consider is the harm that the Cherwell proposal might cause in combination with the adjoining development in West Oxfordshire. Cherwell have not considered that already there is a woeful lack of parking available in Woodstock and there is a real fear that development of this site would create a satellite village whereby shoppers would use the private car to commute to and from Kidlington. Another important issue is the impact of the proposal on this setting of the Blenheim Villa Scheduled Ancient Monument which is within the site itself. The proposed allocation is considered to cause harm to the settings of important heritage assets, it would also impact on the landscape and setting of Woodstock as a result of an incongruous urban extension which is poorly related to the characteristics of the location. The benefits of the proposed allocation do not outweigh these harms, given that there is

scope to deliver housing to contribute towards Oxford's needs in alternative ways, such as through a modest increase in density on sites released from the GB, or by the development of the site Policy PR3a, which is to be removed from the GB but is not proposed for housing development in the proposed submission plan. More efficient use of the GB sites could deliver at least 410 additional homes and therefore eliminate the need for the proposed Woodstock urban extension; as such the proposed allocation is contrary to the NPPF.

Woodstock Town Council - Woodstock is a small market town to the north-west of the city of Oxford. The current settlement has c 1500 houses and c 3000 residents. Housing allocation plans published by Cherwell and West Oxfordshire District Councils would add a further 1080 houses on the south-east, east and northern edges of the town, all on prominent gateway sites into the existing urban core. Such a dramatic increase would inevitably have a substantial impact on the historic town in many ways, such as traffic, infrastructure and services. This report addresses issues specifically relating to the site's rich cultural heritage. It contends that the proposed developments either will cause or have the potential to cause moderate impacts individually on the town and its heritage assets. In a few cases impacts are likely to be moderate to high. The cumulative impact of all four developments (or combinations of them) would be moderate to high. This amounts to substantial harm as defined in the NPPF (paragraphs 132-3). The public benefits (including the conservation benefit claimed for the Blenheim Park Estate) do not outweigh the cumulative harmful impacts.

Oxford City Council - Supports the allocation of sites at Begbroke, Yarnton & Woodstock. Our comments on the details of these policies are more brief as the physical links with the city are more limited (although the economic links with Begbroke & the University of Oxford as part of the 'Knowledge Spine' are clear and strong), however we welcome the delivery of sustainable transport links into neighbouring communities & onwards into Oxford to provide access to employment, services & facilities

Bladon PC - The residents of the Parish of Bladon are concerned with the traffic volumes impact on Bladon. 1. Volume of traffic on A44 and Bladon roundabout. 2. Volume of traffic passing through village via A4095. 3. Pollution caused by increased volume of traffic. 4. Effect of traffic on the World Heritage site of Blenheim.

Begbroke & Yarnton Green Belt Campaign - There is no proper justification for altering the Green Belt boundaries from where they currently stand. They also object to the removal of the land described as PR10, a green field site due to the impact its development will have on the adjacent A44 corridor.

Kidlington Development Watch - While we object to any release of land in the Green Belt including the allocated sites, we have a further concern relating to the possible overall location of land for housing in the event that any or all of the allocated sites are confirmed for development in any adopted plan. PR6a, 6b, 7a, and 8, the land areas allocated specifically for residential development (i.e. not the total site areas) are approximately 50% higher than would be necessary to accommodate the stated number of houses at the net densities specified. For example the largest site (PR8) for 1950 houses at 45dpha net should require 43.3ha; whereas the allocation is for 66ha which is over 50% larger. The definition of net density is not specified in the plan though it usually includes access roads, parking, incidental open space and play areas. There are separate allocations for schools and a local centre, so it appears that the areas allocated specifically for residential

development are significantly too large. Given the desirability of this land to developers, there is a clear risk that permission could be sought for significantly higher numbers of dwellings over and above the intended provision, resulting in even greater environmental harm and pressure on infrastructure. We are therefore concerned about the provision in PR12a (para 7) that should more than 4400 houses be built this will be taken into account in meeting Cherwell's own need, which would appear to be an incentive to the Council to approve higher numbers than set out in this plan.

Woodstock Action Group - The proposed housing on the A4095 border of Woodstock will put further strain upon the town's infrastructure, services and commercial centre. It will adversely affect the approach to the Blenheim Palace World Heritage Site and the local rural environment. Woodstock needs to be protected from such inopportune and damaging development. Other than a couple of the hundreds of policy statements, viz., the plan will "seek to: contribute to improving health and well-being and conserve and enhance the natural environment." There is no mention or consideration of how the plan will cope with the additional noxious nitrogen oxide gases from the up to 6000 or more private cars owned by the 7,400 prospective residents living in the SE area of Woodstock and those in nearby Cherwell District. Public Health England has stated that 5.3% i.e., 276 deaths a year of adults 25 years and older are attributable to air pollution and others suffer with long term conditions such as lung diseases, asthma, cancer and birth defects. The Government has stated that deaths related to air pollution are the second biggest health threat after smoking. And yet, not a mention of this threat is in Cherwell's plans. WSP/Parsons Brinkerhoff compiled a 75-page air quality assessment (AQA) for the development of the 300 houses in the SE quadrant of Woodstock during the 7 year duration of the construction phase as well as the post construction phase on the potential effects of Nitrogen dioxide (No2) and Particulate matter 10 and 2.5 on the prospective affected residents that will occur because of increased volumes of traffic generated by the development. The report concludes that the effects of these concentrations of noxious and deadly gases on those affected, "would be negligible. Not at all convinced that this will be the case as even the authors of this AQA have said, Changes in local traffic volumes and characteristics resulting from the Proposed Development may also have an impact on local air quality". They also state that "road traffic is a major source of the pollutants, NO2 (Nitrogen Oxide), Particulate Matter 10 and 2.5 and the dominant source in many urban areas." This AQA only pertained to the Woodstock East Development of 300 houses Cherwell's plan of 410 at PR 10 will more than double air pollution in the SE quadrant of Woodstock and the nearby area in Cherwell. This has the makings of a worrying cocktail of cumulative and degenerative air quality affecting both human and wildlife receptors. This plan will see more and more development and traffic on a geographic corridor from Oxford along the A44 via villages Yarnton and Begbroke culminating at Woodstock. The GB, once bitten will eventually be swallowed whole. Oxford will expand north to incorporate these villages and become the Greater Oxford Corporation thus making Woodstock and Kidlington suburbs of Oxford and adversely affecting about 18,000- 20,000 residents in these villages and aggravating already congested roads e.g., A4260, A34, A4095 and the A44. Woodstock is only 7km from N. Oxford. The leader of Cherwell Council has said, "... growth must insure that people have convenient, affordable and sustainable travel opportunities to the city's (Oxford) places of work..." We do not see this being the case because of widespread, unabated housing growth in Cherwell and Oxfordshire which is leading to increased levels of inconvenient and unsustainable traffic congestion, gridlock and driver exasperation and anger. It is recognized that change is inevitable but the pace at which it happens is not. We recognize the need for increased housing but not of the magnitude of

4,400 houses, 410 of which are planned just across the A4095 border of Woodstock in Cherwell next to an area, which already has planning permission for 300 houses and possibly more. There are some 1,150 homes in the Shipton Road quadrant which includes Banbury and Hensington Roads and Marlborough Place I & II off Shipton Road plus others. This development will concentrate 1,860 (1,150 + 410 + 300) houses and between 2,500 to 3,000 private and other vehicles in the SE Woodstock quadrant. Many of these residents are those who are most likely to exit onto the A4095 via Shipton Road plus those from the planned Woodstock East development of 300 houses and their counterparts across the border from The Straight Mile. The A4095 is the main artery through Bladon to Witney and beyond and is already congested daily. Traffic on our local highway system; A34, A4095, A44 is now so bad that one does not need to leave one's home to be threatened with injury or worse. Between 1981 and 2011, the numbers of households in the Cherwell District increased by 55% while the number of cars owned by residents increased by 126%. The number of cars per household increased from 0.98 in 1981 to 1.42 in 2011. This was well above the national average of 1.16 cars per household. Using the projected figures of 4,400 houses plus the 60,000 in situ, i.e., 64,400 households, we estimate an increase of 85% of households having one or more cars.

Other comments include:

- Proposed housing on A4095 will put further strain on Woodstock's infrastructure, services and commercial centre.
- Adverse effect on Blenheim Palace WHS.
- Adverse effect on local rural environment.
- Air pollution problems.
- Kidlington and Woodstock will become suburbs of Oxford.
- No coordination with WODC who are also proposing development in their local plan.
- Will dilute historic character of Woodstock.
- Inadequate services and facilities.
- 50% affordable housing will not be achieved.
- Wholehearted support as it provides much needed housing for Woodstock.
- Policy as drafted would restrict the development potential of the site.

Officer Response

The many objections to the development of this site, and the comments on the proposed policy, are noted. Officers remain of the view that the proposed allocation is sustainable and deliverable in view of the evidence.

Historic England's representation on Policy PR10 indicated that the site should not be allocated for development until an archaeological assessment had been undertaken and ascertained the extent and significance of archaeological remains on the site as a whole, to identify if development is acceptable on the site, and if so over what area. Following further discussion, Historic England was provided with archaeological assessment information submitted as part of the previous planning application on the site (14/02004/OUT). On examination, Historic England confirmed that further archaeological assessment was not required in respect of the majority of the allocation site, but that having regard to the information contained in the assessment, it could not support the allocation in

its current form as the area proposed for housing covers part of the areas of archaeological potential. It advised that:

“Any allocation or proposed development should accurately draw on the information gathered already, and as far as possible avoid areas of intensive archaeology shown on the geophysics and other survey reports...”, and

“We recommend that development is withdrawn from areas of known archaeological potential, particularly those of higher potential, and that these areas are included in green space proposals for any allocation or development...”

“We welcome the allocation of the areas to the south and east of the villa as green space, as this reflects comments provided previously ... in terms of preserving the setting of the villa. We note, however, that the Villa area is allocated as retained agricultural land and so would be vulnerable to on-going ploughing and arable planting. To ensure the on-going preservation of the Villa site and associated higher potential deposits, it would be best preserved under controlled grazing or public open space, than under arable.”

The proposed distribution of uses within site PR10 has been amended in response to Historic England’s advice to address these concerns. The Policies Map now indicates archaeological constraint areas and a reconfigured residential development area, and has removed the reference to land retained in agricultural use.

The archaeological survey information submitted as part of the outline planning application did not cover that part of site PR10 allocated for primary school use. It is not yet certain whether this land will be required for a school, playing fields or other outdoor sports provision but following further consultation with Historic England, it indicated that in view of archaeological interest to the south in association with the Scheduled Ancient Monument, a desk based Heritage Impact Assessment and Geophysical survey should be undertaken on the site. This work has commenced but in view of associated timescales Historic England has agreed to some additional wording in the plan to ensure that development on that part of the site will be informed by the outcome of the HIA. It is considered that the proposed reconfiguration of the layout, together with other focused changes requested to policy requirements, have addressed the concerns raised by Historic England.

However, the reconfiguration of the proposed residential area meant that officers needed to review the precise number of dwellings that could be provided on the site. This suggested approximately 489 dwellings. This has been rounded to 500 homes for the purpose of what is a strategic housing allocation and which offsets the reduction in the number of homes (90) planned for land to the west of Yarnton.

Other recommended changes include detailed clarifications and amendments in response to comments received. It is also recommended that the policy makes clear that the development of land for either school or sports pitch use to the north of Shipton Road will be subject to the consideration of a Heritage Impact Assessment in consultation with Historic England-

PR11: Infrastructure Delivery

Over 750 comments were made on this policy. The vast majority raised objections. These included representations from the following:

Gosford & Water Eaton PC - Very concerned about the implications of this development on existing infrastructure. On the basis of current evidence do not believe that infrastructure can be delivered to support this scale of development without adverse effects on both existing and new residents. Opposed to the proposed allocation of 1410 dwellings within the Parish, in part due to the impact on infrastructure.

Begbroke PC - Infrastructure Costs -These will be enormous and there is no plan where this funding will come from. It is doubtful if section 106 monies will suffice.

Yarnton PC - Bus lane improvement along A44 Begbroke to Loop Farm. The proposal is physically & financially impossible owing to the restrictive widths of railway & canal bridge crossings and the underpasses at Peartree Interchange. Further restricted by PR11a (p 167) cycle & pedestrian improvements along A44 between Bladon & Peartree roundabouts. This is a pipe dream & can't be used to justify large scale development adjacent to the A44 at Yarnton/Begbroke. The infrastructure proposals are not justified, not effective & is unsound.

Kidlington PC - An Infrastructure Delivery Plan, rather than a wish-list as in Appendix 4, is essential in order to deliver sustainable development. Policy PR1 should include an additional requirement that all new allocated development makes adequate provision for all relevant infrastructure, unless other arrangements have been secured. Development should not proceed in advance of certainty about the delivery of off-site infrastructure.

Bladon PC - The residents of the Parish of Bladon are concerned with the traffic volumes impact on Bladon. 1. Volume of traffic on A44 and Bladon roundabout. 2. Volume of traffic passing through village via A4095. 3. Pollution caused by increased volume of traffic. 4. Effect of traffic on the World Heritage site of Blenheim.

Oxford City Council - Supports the approach in the Partial Review of progressing each of the proposed site allocations through a development brief. It is the appropriate way to consider the site specific details & infrastructure needs of each proposed allocation in a timely manner. Welcome the opportunity to be involved in the production of the development briefs especially where there are cross-boundary issues to be considered. Acknowledge the on-going partnership work through the Oxfordshire Growth Board & in particular the Oxfordshire Infrastructure Strategy. This is a useful forum for the consideration of the cumulative impacts of planned growth & also cross boundary infrastructure issues. Keen to continue the constructive partnership working & on-going dialogue with Cherwell & to assist in securing prompt delivery of these much needed homes.

Kidlington Development Watch – The policy only sets out “an approach”. It is not therefore a policy and is simply wishful thinking. In the associated infrastructure schedule (Appendix 4) the column for costs contains the letters TBC in every case. In most cases the column for source of funding also contains these letters and in the small minority of cases where a source is identified it is most often “private developers”. This lack of information means that it is impossible to have any confidence that the identified infrastructure needs can be provided. No projects are identified to improve the

already congested highway network for private vehicles and no indication of how the network will cope with the additional vehicles owned by the occupiers of these new houses and the other developments planned for the area. The plan appears to deny people the opportunity to use their cars and relies wholly on people using public transport, cycling and walking. Consider that some of the infrastructure required to support the proposed level of growth together with the growth elsewhere around Oxford would in itself be harmful to the environment which is a further reason why the proposed growth is not sustainable.

Other comments include:

- No costs are shown in the schedule.
- In most cases no source of funding is identified.
- There is no indication of how the already congested highway network will cope with the additional vehicles from those houses and the other developments planned for the wider area.
- New houses on this scale with no real infrastructure improvement are not viable.
- Kidlington and Yarnton will be gridlocked, sacrificing air pollution.
- The assumption that developers will pay for much of the necessary infrastructure and produce record amounts of 'affordable' housing will produce minimal infrastructure and not guarantee that the existing level of educational, health and social services will be maintained, let alone enhanced.
- Wishful thinking.
- Developers will not provide the infrastructure required.
- Underfunded public services (schools and medical services) will deteriorate further.
- Relying on improved public transport, cycling and walking is not realistic.
- Growth should not be approved until infrastructure can be provided.
- There are no effective measures to deal with air pollution.
- Policy as worded is largely meaningless.
- The existing infrastructure already needs substantial investment to address demand.
- There are massive funding shortages and that all attempts to joint fund transport infrastructure improvements have been unsuccessful.
- Consortium welcomes the joined-up and comprehensive approach to the identification and delivery of essential infrastructure to support the development of the sites allocated in the A44 Corridor. This also reflects the recommendations of the National Infrastructure Commission's interim findings. In relation to element 3 of the policy however there must be acknowledgement that financial contributions to the delivery of these infrastructure items must be the subject to an upper limit that, if necessary, can be determined by a viability appraisal.
- Council does not comment on how developer contributions will be secured on sites where there are multiple landownerships.
- Where a developer has provided for infrastructure at the outset, then there should be a recognition in the policy that any 'abnormal costs' associated with this provision can be credited against future planning obligations for the site.
- It is essential that the developer contributions to infrastructure requirements are based on an equitable equalisation or other mechanism.

Officer Response

These comments have been noted. The Infrastructure Schedule supporting the plan has been updated following the receipt of additional information and discussion with service planners / providers such as the County Council (including on education matters), the Oxfordshire Clinical Commissioning Group (with local GP Practice Managers) and the Council's own community/recreation services. A Developer Contributions Supplementary Planning Document will assist in the delivery of required infrastructure. More widely, the completion of an Oxfordshire Infrastructure Strategy (evidence doc. PR35) strengthens the position of the Oxfordshire authorities and is seeking Government funding where required to support or accelerate delivery.

Officers consider the Plan's proposals to be 'sound' with regard to infrastructure delivery. Focused changes are recommended to improve the Plan and bring specific requirements up-to-date.

Policy PR12a – Delivering Sites and Maintaining Housing Supply

Approximately 40 comments were made in relation to this policy. These included representations from the following:

South Oxfordshire DC - The approach that CDC takes to meet their apportionment of Oxford's unmet need is for them to determine. We note this takes the form of 'ring-fencing' as a separate 5 year housing land supply which will be maintained for meeting Oxford City's unmet need. Acknowledge that CDC have proposed to meet their apportionment through 7 strategic sites, however we understand that this could be dependent on the local assessment of their capacity. If it is found that the capacity of these 7 sites is deemed to be lower than initially thought, we assume that CDC are still capable of accommodating the remainder of their apportionment of Oxford's unmet need within their own district?

Oxfordshire County Council - The scale of housing being planned for through the LPPR as Cherwell's contribution to meeting Oxford's unmet housing needs is supported. The proposed 4,400 homes figure reflects the apportionment of Oxford's unmet need between the councils agreed by the Growth Board in September 2016 and which is set out in the Growth Board Memorandum of Co-operation and we also support the proposal to ensure delivery of these homes by 2031. The proposed 2021 start date recognises the likely complexity of the issues needing to be addressed and allows a reasonable lead time for developments to come forward. However, OCC has no objection in principle to earlier housing delivery, provided the strategic infrastructure required to support the new housing exists or can be delivered matched to the accelerated housing.

Bodicote PC - Concerns with paragraph 5.166, which states that "If a five year supply cannot be raised for reasons outside the Council's control, planning applications for unplanned development might be submitted. This paragraph acknowledges that the Council cannot force developers to adhere to house building trajectories. Cherwell District Council's 'Annual Monitoring Report' has already shown us that house building targets have been down on estimated numbers. In reality if the Council has no control over housing delivery rates then they have no real control over the developers, who will of course state that they can maintain a five year housing supply to get the applications through, but then could negate through reserved matters. If developers do not deliver the requirement of 1700 homes within the first period 2021- 2026 there is a real concern that many

of the sites that were put forward for development and dismissed as areas of interest WILL be targeted as additional sites for Oxford's Unmet Housing Need.

Home Builders Federation - Concern expressed in confining the delivery of Oxford's unmet need to the 2021 to 2031 period and ring-fencing Oxford's unmet need from Cherwell's on housing requirement. Whilst we are supportive of the joint working that has taken place to ensure unmet needs within the HMA are delivered we remain concerned that Cherwell, and the other authorities in the HMA, are seeking to separate their own needs from that of Oxford's. The unmet need arising from Oxford should be considered as part of the Cherwell's housing requirement and should be monitored as such. It must be recognised that Oxford cannot meet its needs and that the demand for housing in Oxford will inevitably fall on the shoulders of its neighbours.

BBOWT - Policy PR12a and the Housing trajectory in Appendix 3 suggests that sites will come forward at different times in the plan period with sites PR6a, PR7b, PR8 and PR9 being the first ones to come forward at 2021. Site PR6b is proposed to be released at 2023, and sites PR7a and PR10 are not due to come forward until 2026. The government is currently consulting on a standard method of how to calculate housing need. It is our understanding that if this calculation is adopted, it might be possible that fewer houses are needed to meet Oxford's housing needs and as a result not all site allocations might be required. As mentioned above concerned about the proposed quantum of development in Oxfordshire and neighbouring counties and would welcome if fewer sites would be required for development.

Kidlington Development Watch - While we object to any release of land in the Green Belt including the allocated sites, we have a further concern relating to the possible overall location of land for housing in the event that any or all of the allocated sites are confirmed for development in any adopted plan. PR6a, 6b, 7a, and 8, the land areas allocated specifically for residential development (i.e. not the total site areas) are approximately 50% higher than would be necessary to accommodate the stated number of houses at the net densities specified. For example the largest site (PR8) for 1950 houses at 45dpha net should require 43.3ha; whereas the allocation is for 66ha, over 50% larger. The definition of net density is not specified in the plan though it usually includes access roads, parking, incidental open space and play areas. There are separate allocations for schools and a local centre, so it appears that the areas allocated specifically for residential development are significantly too large. Given the desirability of this land to developers, there is a clear risk that permission could be sought for significantly higher numbers of dwellings over and above the intended provision, resulting in even greater environmental harm and pressure on infrastructure. We are therefore concerned about the provision in PR12a (para 7) that should more than 4400 houses be built this will be taken into account in meeting Cherwell's own need, which would appear to be an incentive to the Council to approve higher numbers than set out in this plan."

Other comments include:

- Dorchester Group considers that the seventh paragraph of the policy should be deleted.
- The Consortium considers that the demand for housing in and around Oxford is such that the phasing of new development solely on the basis of abstract 5 year periods is unnecessary. A number of factors would suggest that the application of such phasing policies is inappropriate.

- The proposed approach that seeks a commencement of the five year supply for Oxford's needs at 2021 is not supported by the NPPF and is inconsistent with Government guidance. CDC's specific housing need and 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.
- The NPPF states that 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 NPPF.
- Delivery plans should be realistic, accounting for and responding to lead-in times and sensible build rates. It should be recognised that no site is the same and that a reasonable and realistic approach to evidence and justification will be required.
- The evidence base prepared to support this policy is not sufficiently robust to justify the strategy. It will provide an over concentration of housing within a relatively small market area with known congestion issues. The plan has failed to consider the reasonable alternatives.
- Policy appears to be an incentive to the Council to approve higher numbers than set out in the Plan.
- The Policy should be amended to allow for the early delivery of sites if they are able to do so. This amendment will ensure the Plan has sufficient flexibility to adapt should some of the proposed allocations not deliver as anticipated or should the unmet needs of Oxford City which Cherwell needs to meet increases.
- The housing delivery trajectory is not considered to be robust or realistic.
- There is an over reliance on the delivery at PR8.
- Cherwell should not be fearful of over provision.
- Plan cannot and should not seek to control the rate of delivery.
- There is no explanation as to why the sites at South East of Kidlington or South East of Woodstock have been identified as having delivery deferred to the final five years of the plan period.
- Plan fails to identify how any harm would arise if Oxford's unmet need were to be met earlier than 2026.

Officer Response

These comments have been noted. Officers consider the policy to be sound but are proposing focussed changes to provide further clarification on how sites will contribute to delivering a five year housing supply.

Policy PR12b – Sites Not Allocated in the Partial Review

Approximately 30 comments were made in relation to this policy. These included representations from the following:

Gosford & Water Eaton PC - Land identified as Green Belt following this review should remain Green Belt permanently and under no circumstances would further development on it be permitted. Note that there is an additional clause requiring consultation and support of the local community. It is unclear how local community support would be considered. It is difficult for us to believe that if the

Council was faced with having to consider other sites to ensure that they meet the housing supply that local community objection would be sufficient to prevent development going ahead. In the interests of providing certainty it would seem more appropriate to have a robust Plan that is deliverable and ensures that remaining areas are fully protected rather than allowing exceptions such as provided for by this policy. This policy should not allow for any additional development or release of Green Belt land within the Parish.

Kidlington PC - Extremely concerned that the Policy makes provision for the release of unspecified sites in the future on the basis that they are sites listed in a HELAA. This for example would include Frieze Farm, and land to the north of the village. These sites have been discarded for valid reasons in the Plan, which is fully supported. The policy should be deleted as contingency sites are not required to meet the Plan's objectives. If the policy remains it should include a requirement for 50% affordable housing; and the support of the relevant Parish Council.

South Oxfordshire DC - More clarity should be provided in respect of how will it be determined or justified as to whether or not a particular application should meet Oxford's unmet need or the district's requirement?

Historic England – The policy should have a requirement for a Heritage Impact Assessment and a desk-based archaeological investigation.

Kidlington Development Watch - Support for the Council's rejection of all Green Belt sites proposed at the options stage (and that are not proposed to be allocated in the draft submission plan). Are unclear about the purpose of Policy 12b in relation to sites within the Green Belt. Green Belt site should never be supported for development precisely because it is in the Green Belt and regardless of the qualifications given in clauses 1 to 5 of the proposed policy. Permitting such development would be contrary to planning guidance which states that unmet housing need does not constitute very special circumstances for building in the Green Belt.

Other comments include:

- The trigger should be the housing land supply to meet Oxford's unmet need.
- The need for 'exceptional circumstances' to exist in all the unallocated sites in the Green Belt should be added to the policy.
- If the Council does not have a 5 year housing land supply then paragraph 49 of the NPPF applies, and not Policy PR12b.
- The ambiguity in 12b should be corrected so the policy is clear that no development would be permitted on Green Belt sites that are not allocated in the partial review.
- Concern that this will be used as a mechanism for the release of land in the HELAA that is land not currently included and discarded in this plan. This could open up unsustainable development in the north of Kidlington and in particular on land at the rear of The Moors between The Moors and the River Cherwell.
- Further contingency sites are not needed to meet the housing targets.
- The requirement for the site to be identified in the HELAA is unreasonable and not justified.
- The requirement of the support of the local community is not consistent with the NPPF.
- Sites should not be identified on the basis of their proximity to Oxford City alone, but their consistency with the adopted spatial strategy.

- Policy should be more specific about safeguarded sites.
- Meets none of the soundness criteria stated in the NPPF (paragraph 182).
- Policy is unnecessary.
- Policy is vague.

Officer Response

These comments have been noted. Officers consider the policy to be sound but are proposing focussed changes to provide a consistent approach to seeking 50% affordable housing for unallocated sites.

Policy PR13 – Monitoring

Less than 10 comments were received on this policy. These included representations from the following:

Oxford City Council - The Partial Review sets out positive measures to ensure delivery of the supply of homes for Oxford, which is welcomed. It is very helpful that the plan includes a very clear trajectory for the sites contributing to Oxford's unmet need, to enable monitoring against the Growth Board apportionment, & for understanding the likely phasing of delivery.

Other comments include:

- Unsure that CDC is able to monitor and carefully scrutinise projects once implemented.
- Plan should identify reserve sites.
- It is unclear how Policy PR13 and PR12b relate to one another with regards to what action the Council would take if the allocated housing sites are not likely to deliver sufficient new homes to meet Oxford's needs.
- Monitoring must ensure that no development proceeds until the necessary transport and other infrastructure is costed, funded, and programmed.

Officer Response

These comments have been noted. Officers consider the policy to be sound but a focussed change is proposed to improve the policy.

Appendix 1

BBOWT - Mapping often only shows the individual site but not the wider development context such as other proposed site allocations in Cherwell DC or neighbouring authorities such as Oxford City Council or West Oxon District Council, which makes it difficult to get the full picture. Recommend that detail on future land use is provided. Key to be considered for woodland/ancient woodland.

Officer Response

These comments have been noted. Focussed changes and minor modifications to the Policies Map are proposed.

Appendix 4 – Infrastructure Schedule

Yarnton PC - Bus lane improvement along A44 Begbroke to Loop Farm. The proposal is physically & financially impossible owing to the restrictive widths of railway & canal bridge crossings and the underpasses at Peartree Interchange. Further restricted by PR11a (p 167) cycle & pedestrian improvements along A44 between Bladon & Peartree roundabouts. This is a pipe dream & can't be used to justify large scale development adjacent to the A44 at Yarnton/Begbroke. The infrastructure proposals are not justified, not effective & is unsound.

OCCG - The intention for the main health hub campus in Kidlington is to have the two existing local practices working together as a single unit to ensure sustainability for the future. The placement of this health hub is undergoing discussion, and is very much reliant on developer contributions for it to go ahead. With the housing proposed in the Kidlington, Yarnton, Woodstock area, all local practices will be significantly impacted upon, with Islip least affected. Three health hub site options have been identified. Object to this development until we are satisfied that sufficient provision is being made for healthcare infrastructure to meet the healthcare needs for the proposed development.

Other comments include:

- Bus Lane improvement along the A44 Begbroke to Loop Farm: This proposal is physically and financially impossible owing to the restrictive widths of railway and canal bridge crossings.
- Rapid Transit Route: Unrealistic.
- Sandy Lane closure: Strong objections.
- The suggestion to redevelop Exeter Hall suggests that Yarnton people would be expected to travel there to see a GP.
- Costs and sources of funding are largely unidentified.
- Delivery dates are vague.
- No risks or mitigations have been identified.
- There needs to be a much clearer link between the transport improvements and new developments.
- The Infrastructure Schedule is incomplete. It should therefore be considered as a 'work in progress'.
- Lack of thought to infrastructure.

Officer Response

Many of the representations received include concerns about the capacity of existing infrastructure such as schools and health services and the timely deliverability of new infrastructure to serve the proposed developments. The Infrastructure Schedule supporting the plan has been updated following the receipt of additional information and discussion with service planners / providers such as the County Council (including on education matters), the Oxfordshire Clinical Commissioning Group (with local GP Practice Managers) and the Council's own community/recreation services. An adopted Developer Contributions Supplementary Planning Document will assist in the delivery of required infrastructure. More widely, the completion of an Oxfordshire Infrastructure Strategy (evidence doc. PR35) strengthens the position of the Oxfordshire authorities and is seeking Government funding where required to support or accelerate delivery.

Officers consider the Plan's proposals to be 'sound' with regard to infrastructure delivery. Focused changes are recommended to improve the Plan and bring specific requirements up-to-date.

Consultation Process

There were over 600 comments relating to the consultation process.

(NB. The Council extended the consultation period to October 2017)

- The Council is pushing the Plan through without considering the effects
- The documentation material is complex, meaning that residents cannot understand it
- The exhibitions were deliberately held during the summer holidays meaning people could not attend.
- The Plan was designed to convince local people to buy new homes.
- The consultation period was too short.
- The volume of material was not possible to review for comment in the period of time allowed for the consultation.
- Only a high level Options paper was published at the 'Regulation 18' stage. The Options consultation failed to appropriately communicate that preferred areas of search (A and B) had been identified and that detailed work had been undertaken to assess sites within these two areas of search only.
- Apart from in the "guidance on representations" it is not clear how comments will be considered in terms of the formal stages.
- The response forms are unclear and people were not made aware that other forms of responses were acceptable.
- There is lack of explanation within the plan of "where we are now" or discussion of "next steps". This is a fundamentally misleading approach contrary to B.95 of the Local Plan which indicates that "Full public consultation will be central to a "sound" process and outcome." For consultation to be lawful, it must take place when proposals are at a formative stage.
- A draft Plan should have been produced before the Proposed Submission.
- If the Council proceeds as planned, it is considered the Inspector will find the Plan unsound due to inadequacy of evidence base and failure to ensure effective consultation and participation by the public.
- Concern that the Council has progressed with the current Plan despite an overwhelmingly negative response to the Options consultation.
- Concern over the Statement of Consultation document and how it captured the public comments.
- The Statement of Consultation material is misleading and inadequate
- There were no questions in the consultation on the release of the Green Belt therefore the public were not given an opportunity to express views on this earlier.
- The Council must provide information in a user friendly style.
- The Council should start listening to other voices than those of the development lobby.
- The content of the plan was predetermined in advance of the consultation
- The Council must rethink and improve its policy for conducting important public consultations.
- Very important documents were missing from the website including the HELAA and Transport Assessment.

Officer Response

The archaeological survey information submitted as part of the outline planning application did not cover that part of site PR10 allocated for primary school use. It is not yet certain whether this land will be required for a school, playing fields or other outdoor sports provision but following further consultation with Historic England, it indicated that in view of archaeological interest to the south in association with the Scheduled Ancient Monument, a desk based Heritage Impact Assessment and Geophysical survey should be undertaken on the site. This work has commenced but in view of associated timescales Historic England has agreed to some additional wording in the plan to ensure that development on that part of the site will be informed by the outcome of the HIA. It is considered that the proposed reconfiguration of the layout, together with other focused changes requested to policy requirements, have addressed the concerns raised by Historic England.

However, the reconfiguration of the proposed residential area meant that officers needed to review the precise number of dwellings that could be provided on the site. This suggested approximately 489 dwellings. This has been rounded to 500 homes for the purpose of what is a strategic housing allocation and which offsets the reduction in the number of homes (90) planned for land to the west of Yarnton.

Other recommended changes include detailed clarifications and amendments in response to comments received. It is also recommended that the policy makes clear that the development of land for either school or sports pitch use to the north of Shipton Road will be subject to the consideration of a Heritage Impact Assessment in consultation with Historic England—exhibitions. Town/Parish Council and stakeholder workshops have been held. Officers consider that legally compliant, appropriate and timely opportunities were provided for the public to engage effectively with the plan making process at the Regulation 18 stage and for people to give intelligent consideration and response in terms of the content of the Plan and its specific proposals. Members have the opportunity to conscientiously take into account the representations in considering the recommendations of officers.

In addition to the requirements as to consultation in the Local Plan Regulations and the Council's SCI, the courts have set down requirements, in particular *R (Moseley) v Haringey London Borough Council* [2014] 1 WLR 3947. They are that: (i) consultation must be at a time when proposals are still at a formative stage; (ii) the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response; (iii) that adequate time must be given for consideration and response; and (iv) that the product of consultation must be conscientiously taken into account in finalising any proposals. Officers consider that there has been compliance with all these requirements.

There is no statutory requirement to publish a draft Plan prior to the publication of a Proposed Submission document. In the issues consultation paper (January 2016, evidence doc. PR20), the Council advised under 'next steps' that the responses received would be used 'to inform the preparation of the next stage of the Partial Review: consultation on the spatial options for accommodating the additional growth' (para. 8.1). In the options consultation paper, (November 2016, evidence doc. PR47), the Council advised under 'next steps', 'The feedback we receive will be used in the further consideration of issues and options, in completing our evidence base and in

preparing a proposed document which we will publish in 2017' (para. 9.2). The Plan's preparation has been in accordance with these stated intentions.

General comments

In excess of 1200 comments were received that were not necessarily policy specific. The issues raised in these comments include the following (grouped under Issue specific headings).

Growth

- Oxford City should resolve its own housing problems and find brownfield sites to build on
- The country does need more housing and some of the locations in and around Kidlington and Gosford which it is proposed to develop for housing are the best in the circumstances.
- The places need to be built to be self-sufficient
- Scale of the proposal is too large
- Considers the plan to be sound as it directly addresses existing and future issues regarding sustainable transport connectivity to and from central Oxford.
- CDC's vision responds to the specific needs and growth of Oxford, the relationship between housing and employment, and the importance of building sustainable communities that are well related to Oxford while respecting the Cherwell context.
- Not opposed to sensible plans
- Yarnton will be quadrupled and the necessary services will be years behind
- Yarnton and Begbroke would become suburbs of Oxford
- Add 10% (on average) to each existing settlement, improving viability of local amenities.
- Raise the densities within larger towns and cities, where transport and amenities already exist.
- No consultation has taken place with local residents
- This is a gateway to the Cotswolds; it is imperative that these villages keep their identities and grow in a linear approach and not mass building.
- New housing projects should be shared with all Oxfordshire villages
- Fully support the need to build homes to support future intake and families.
- Oxfordshire is already over populated. It will encourage more people to come in the county.
- The council cannot provide services and facilities, which are already at breaking point.
- The road (A44) cannot cope with the increase in traffic. The current situation is bad with traffic at gridlock at peak hours. Traffic lights at Begbroke Science Park lead to tailbacks up to Langford Lane. Palace traffic lights also lead to tailbacks.
- Proposals are driven by Oxford City
- CDC should be serving the needs of the local community and not taking instructions from Oxford
- Proposal is unsustainable, reactive and without consideration for consequences.
- Housing forecast is flawed
- It flies completely in the face of the majority of local voter opinion
- Dividing land use planning between 5 districts creates difficulties
- Cherwell has functional links to the surrounding Districts through wildlife corridors, water catchment and drains/streams/rivers as well as transport links and the housing intended to meet Oxford's needs.

- The scale of the unmet need has not been objectively assessed. It relies on 2014 SHMA that hasn't been scrutinised.
- Local food systems should be promoted
- The overarching vision for the local plan should include objectives for a zero carbon district/city; a water neutral region; not producing any waste water; planning to reduce waste to zero, eliminating waste to landfill, and a net reduction in road traffic growth.
- Urge planners to find alternative sites in the City. E.g. Southfields golf course, move Park and Rides outside the City and use that land for building.
- The City Council should stop building on commercial sites and concentrate on their own housing needs, before going for the easy option to build on local GB. There are several commercial sites that do not have full occupancy
- Can we be sure there is no nepotism, in the decision within the parties concerned?
- Our historic village should be preserved and it should not be an overspill from Oxford and London and should not be merged with Yarnton and Begbroke. Without GB separating us we will become a suburb of Oxford.
- CDC's childish attempts to push this plan through with the minimum statutory consultation are a clear indication that what is being proposed here is not right.
- The case for Oxford's need has been overstated
- If Oxford was to switch land designated for business to housing it would be able to meet its housing obligations.
- The Local Plan Review attacks the core principles on which GBs depend.
- Employment needs to be focussed at Bicester where there are already a large number of new housing being built and infrastructure already in place to manage this.
- The homelessness crisis is acute in Oxford. The Council needs to work harder to reinstate some of the vital services which have been limited or closed, particularly as regards physical and mental health, the most significant causes of homelessness.
- The centre of Banbury is disappearing because of the building of retail parks and housing out of town, and yet there is no refurbishment of the town centre as a residential social hub.
- The greed of Blenheim Palace, Merton College and Exeter Colleges: these can at best be described as commercial, self-serving, and excessively wealthy enterprises.
- Joining all the villages up and then joining it all up to Oxford will create a dormitory.
- The data being used is pre-Brexit. These are not sound data now.
- The proposals need full and wide discussion rather than being rushed through the holiday period, and there should be further, more robust discussions with Oxford City Council.
- There are plenty of large areas south of Oxford. It is Oxford City's problem and Cherwell Council should vehemently object to this Oxford overspill being developed north of the Oxford City boundary.
- Limited space for development exists due to flood plains in and around Oxford, and although reasonable for surrounding villages to expand slightly to keep the region prosperous, the scale of the plan is out of proportion and unsustainable without massive investment in infrastructure.
- GB is there for a reason and we want Kidlington to keep its identity and separation from Oxford, as well as the golf course, trees and wildlife. Think that PR 7a and PR 7b are

manageable and a smaller sized PR8 as the roads could possibly manage. But not PR6 and PR6b. Please keep developments small and manageable.

- Kidlington is big enough for its 'village' status, confirmed years ago by residents voting against being a town. In the 52 years we have been here we have lost green space opposite and the traffic has greatly increased. We don't want to become part of an urban sprawl and we do not want to meet Oxford needs.
- Recognise that the content of this paper is sensible and necessary to maintain our community standards. However, also believe that this is just a paper exercise for officialdom to say 'we have had our say'. Until the government meets the demands of the nation and stops immigration the mandate to build unreasonable amounts of houses will be unstoppable.
- Kidlington has already changed from a village to a small town with few green spaces, and we need green spaces.
- The developments proposed and their infrastructure requirements have not been objectively or thoroughly assessed. Previous work has often simply been integrated without amendment or recognition of new circumstances. In many respects it's a "rip and read" plan
- The proposed developments emanate from the economic self-interest of Oxford City Council. Their claimed unmet housing needs have not been independently tested
- Integration of large numbers of in-comers into what would be an urban tangle of concrete and glass usurping once beautiful countryside is likely to prove extremely problematic.
- Cherwell have set a new precedent in claiming that houses are equal to Green Belt in sustainability terms. They have done a straight swap in their Sustainability Report so there's no loss on the sustainability balance sheet.. The term "sustainable" now has an all-embracing legal definition, diluting its original meaning to the point of uselessness, and downgrading the trust the public can put in it.
- The plan represents a huge increase in housing that would put pressure on related infrastructure, not addressed satisfactorily by the plan. The indication is that housing is aimed at commuters rather than trying to address local housing needs.
- Objection to proposed development of planned 4,400 houses because of traffic, pollution, flood risk, danger to wildlife, lack of planning around statutory services and GB arguments.
- It is also our responsibility to steward recreational areas of the countryside in the crowded S. Midlands and SE England for the sake of future generations.
- The national housing crisis needs to be addressed with new towns e.g. previously Milton Keynes and GB should be preserved. The proposals do not meet the needs of the constituents.

Consultation

- Unreasonable consultation process.
- Objection to the complexity of the consultation and its timing over the school holidays. The Council has not given members of the public a fair opportunity to read and understand the proposals and make their views known.

Development - governance

- Any development north of Cutteslowe roundabout would fill in land between there and Kidlington and be under the control of Oxford City Council.

Housing

- The houses will not be built for local people due to the house prices. They will be for commuters to and from London or buy to lets.
- Housing demand has changed drastically since Brexit,
- In view of Brexit, the scale of housing should be revisited
- 200 extra homes have been built in Yarnton since 2011
- Sandy Lane closure cuts off Yarnton from Kidlington
- People understand the need for housing, but not the numbers and densities planned
- The proposed high density housing will lead to increase in traffic congestion and pollution, loss of the rural character of Kidlington.
- The problems and opportunities of housing the older generation have been underestimated. It should not be looking at housing for the elderly, but ensuring that most/all new developments are suitable for them.
- It is Government policy that self/custom building should be encouraged in order to make a substantial contribution to housing supply.
- The sustainability of custom splitting makes the proposal to spread Oxford out into the Green Belt look comparatively if not extremely unsustainable.
- It is undesirable to build houses directly underneath power-lines and the cost of re-routing this or cabling underground need to be encouraged
- Any more development near the world heritage site is unacceptable.
- The density of 45 dph is very high. It is too much for the local villages and not in keeping with the existing villages.
- The 'promise' that a proportion of the new houses will be made over to the Housing Association and be available for rental, is an attractive one, but we have seen across the country that this very rarely happens, in reality. Younger generations want the opportunity of owning their own homes, and do not want to continue renting
- We must limit the driving effect of windfall profits for one part of the community at the expense of others - and preferably direct some of them into reducing housing costs.
- Concern over homes near Oxford Parkway being bought by London commuters - how will this be prevented?
- Sudden influx of so many families into Kidlington would put enormous pressures on its facilities.
- This is not sustainable and puts a burden on schools, doctors' surgeries and the traffic at the northern gateway – already gridlocked in rush hours. Could cause delays, pollution, potential for road traffic, accidents etc.

Affordable Housing

- Affordable homes within these development will not be affordable
- It will fail to provide truly affordable housing so desperately needed
- Developers will have no interest in low-cost housing where land has become plentiful, work remote and adequate transport and amenities absent.
- Affordable housing is not affordable for our children
- Do not believe that the 50% target of affordable houses will be achieved.
- Our children and friends' children have been forced to move from the area due to astronomical rents and the 'affordable' housing is not affordable.
- It is important that a large majority of housing to be built is affordable.

Infrastructure

- A huge increase in homes without proper infrastructure will only makes this worse.
- There is apparent lack of suitable infrastructure. We need better infrastructure now – let alone for additional housing
- Without detailed costings and guaranteed funding for improved infrastructure, the highway network will be overwhelmed by the additional traffic
- There are no costs shown in the infrastructure schedule. No sources of funding are identified
- Proposals will have detrimental effect on infrastructure
- Infrastructure is at breaking point with the A44 and A34 unable to cope with the amount of traffic.
- The new development at Cresswell Close has drainage problems. This is a fundamental lack of infrastructure planning which concern and fear that this lack of foresight could be replicated again.
- Adversely affect drainage
- Floodplain (most recent major flooding event January 2014 in which the A34 was threatened by water on both sides between the Pear Tree and Botley interchanges): -the Partial Review July 2017' document alludes to the floodplain as a 'major constraint'
- Concerned about the impact on local services
- Does the plan include new schools and GP practices?
- Development will exacerbate the flood risk to housing and adjoining land/conservation area.
- Inadequate local infrastructure to support development of this scale.
- Will need at least 3 more primary schools and one more secondary school and triple the number of Doctors surgeries and dentists. Have not seen any mention of this, although all the documents associated with the consultation are so complicated and wordy it is very difficult to find any facts at all.
- Not enough recreational outdoor space or parks for children in Kidlington
- To take away a sporting facility such as North Oxford Golf Club, which is over 100 years old, is a crime. This needs to be stopped. It does not bear contemplating what it will be like once this nonsense is put in place.
- Provision of Infrastructure - the plan is unconvincing in that no significant new investment is identified or proposed.
- Public services and leisure facilities equally need clear and imaginative plans before the developments start.
- The sewage system is already unsuitable

Green Belt

- The GB was always meant to be permanent and Oxford should stay separate from Kidlington and other villages.
- Local countryside enriches life and maintains health.
- CDC should review the Plan as it is contrary to GB protection
- There are no exceptional circumstances for CDC's proposal to build in the GB.
- GB land is protected by legislation and should not be built upon. It was intended to retain distinct boundaries between settlements.

- Strong objection to building on the GB. Without regard to meeting actual need, effective transport, amenities, true community and catastrophic effects on existing settlements
- GB was constituted to prevent urban sprawl between towns and there are no exceptional circumstances to overcome it and set a precedent.
- The plans would destroy the historic identity of all three communities and cause irreparable damage to the wildlife and beauty of the GB surrounding these villages.
- GB policy prevents development, why are you breaking the law?
- Oxford needs to look closer to home before encroaching on GB which will be lost forever.
- GB encroachment is contrary to its adopted Cherwell Local Plan 2015
- CPRE data – 76% of Oxfordshire residents were in favour of protecting the GB. Viewed as a major threat and they do not want Begbroke to be surrounded by houses.
- Objects to 4400 homes in the GB. Contrary to the GB purposes outlined in the NPPF
- It is crucial to protect the GB and farmland in it as it is a carbon sink for the pollution from Oxford.
- Strongly object to the proposal to build on the GB around Begbroke, Kidlington and Yarnton because it would become an urban sprawl and the A44 and A34 will come to a gridlock.
- High concern for the proposal to build 4400 houses on the GB.
- Building on the GB will put the floodplain under even more pressure, and we will see serious, potentially fatal, flooding problems across the nearby communities. It also provides a unique and precious wildlife habitat.
- The marking out of additional Green Belt sites for nebulous use which can easily be seen as ring-fencing more green-belt for development as required.
- The case has not been made for sacrificing GB land and sufficient consideration has not been given to the 400 homes in the area.
- Deeply concerned about loss of GB and associated impact on wildlife and the environment
- GB legislation is fantastic and should be respected above all else. It keeps the region in check, provides countryside for the natural population and this cannot be eroded - it would be a travesty for present and future generations.
- **Transport**
- It is unreasonable to take 45-60 minutes to go 5 miles on the bus.
- As a cyclist experience high levels of pollution already and buses get stuck in the bottlenecks that remove the bus lanes.
- A34 is a disaster and Junction 9 is one of the worst in the country.
- Very concerned about traffic movement
- It should be a priority to provide a sustainable movement corridor into and through the town for pedestrians, cyclists and public transport. The plan addresses this and provides not only for existing modes of transport but has the potential to provide for other rapid transport and environmentally friendly systems such as autonomous and electric busses, trams or other forms of mass transportation. There is significant growth in this technology which will be implemented during the life of this plan. The plan considers this point well, is "future protected" and that has to be applauded.
- There is no indication of how the already congested highway network will cope, and local wildlife will be pushed away.

- Traffic and congestion on local roads
- Reinstating the station at Yarnton and a tram route to Kidlington, Oxford and Witney is paramount to address the traffic problems in the area.
- Blenheim Palace has been granted additional housing, which will increase the traffic and pollution along the A44
- There is a lack of understanding of the traffic conditions that already exist in this area, and additional houses will add to the traffic problems.
- Traffic congestion problems between Begbroke/Yarnton and Oxford are intolerable
- A44 traffic congestion and 50 mile speed limit add to travel time and cause delays
- Yarnton roads are bad.
- Closing Sandy Lane will create long delays and risk of accidents on the A44. It will remove a key road link between Yarnton and Kidlington.
- This development will contribute to more pollution from traffic and therefore we will suffer from respiratory problems.
- Concerns regarding the existing traffic congestion and pollution in Kidlington
- Volume of traffic on the A44 at present is at capacity during peak hours. With the proposed closure of Sandy Lane the problem will be compounded.
- How will this road address an additional 8-10,000 people using this road?
- Closing Sandy Lane would cause greater congestion to the A44 and A4260
- In the areas bordering A34 allowance should be made for the expansion of the dual carriageway into a 3 lane motorway.
- London commuters will benefit from the new Parkway station and not the homeless from Oxford
- Traffic congestion is magnified with events at Blenheim Estate
- Traffic through Gosford and Water Eaton on the A4260 is already gridlocked during peak periods
- Oxford Parkway Station is already overcrowded at peak times.
- Increased numbers will result in more cars on the crowded roads
- The volume and speed of vehicles along this road puts the children using the preschool, school and park, the elderly living in the residential home and everyone going to the social club and doctor's surgery at risk.
- The proposed new railway station between Begbroke and Kidlington is unrealistic.
- There must be 'joined up' thinking; analysis of real rather than perceived future need, and together with Oxford City, CDC must be more resourceful and creative about finding responsible solutions to housing issues.
- The new housing should be delayed until the Oxford to Cambridge Expressway route has been decided. East West railway reopened and the full expansion of Bicester is agreed with its potential new transport infrastructure.
- The suggestion that the Sandy Lane link can become a wheel-chair access and cycle lane as part of a cycle 'superhighway' into Oxford is ludicrous! In any case, such a project would simply lengthen cycle journeys!
- It should be a priority to provide a sustainable movement corridor into and through the town for pedestrians

- The plans do not sufficiently factor in the fact that the A34 and Bicester Road are already gridlocked during peak times. There must be fully costed and funded plans for road improvement and cycle paths/bus routes.
- Parking in residential streets has become a problem since charging was introduced at the Park and Ride, and this issue will be exacerbated by the additional housing

Health/ Health and Wellbeing

- Surgeries are unable to cope. There is a 4 weeks wait for a doctor's appointment
- Harm to the health and wellbeing of the residents and open countryside.
- It is difficult to get a doctor's appointment. This will exacerbate the problem
- Doctors' appointments take 2/3 weeks. Are there plans to improve the service or provide new facility
- Health services are oversubscribed
- Harm to health and wellbeing
- As far as the Doctors' Surgeries are concerned, they are already under intense pressure and we have to wait three weeks for an appointment. These 4,400 extra households will make it well-nigh impossible to get an appointment! With an ageing population generally, and an increasing number of care homes and sheltered accommodation for the elderly in Kidlington, this makes for an impossible situation.

Education

- Primary Schools have reached capacity and oversubscribed
- Secondary school pupils travel to Woodstock would need to be picked up at 7.30 am to reach in time for lessons
- Schools will be needed to meet the needs of these extra families
- Local schools are at saturation point and struggling to provide a good standard of education to the existing population - how big would class sizes become with new developments?

Flooding, Landscape, Ecology and Environment

- What arrangements have been made to protect deer, badgers, foxes and other habitat?
- Yarnton has historical footpaths relating back to the Civil War
- The loss of chicken and deer farm and other farms around Yarnton, Begbroke and Kidlington will destroy the nature of the area.
- It will have adverse effect on the diversity of local wildlife
- It will undermine protection for the countryside and rural landscape
- There are bats in the copse situated between the field at Water Eaton Lane
- Irretrievable damage to the countryside and serious loss of wildlife habitat
- Loss of Ancient footpaths (Frogwelldown Lane), the bridleways and Shakespeare Way, which give access to walkers, riders and cyclists.
- Loss of countryside and radically alter the character of the area. It will create a town by stealth
- High density development will destroy the ecology, and habitat forever, which give us wellness and wellbeing.
- Loss of open countryside if site south of Kidlington is built upon. Nature Reserve will be adversely affected by the development.
- Flooding at Rowel Brook and residential areas around it.
- Further threat to local wildlife and bio-diversity species

- If the proposal to build 4400 goes ahead then no amount of 'mitigation' is going to lessen the huge impact it will have on the environment and the community.
- Soil quality has been neglected by those engaged in urban development.
- There should be a concerted attempt to coordinate the use of countryside in terms of including strategic tree planting, soil protection, wetland creation, water retention, run-off prevention, food production.
- All open space not given to recreation should be planted
- The water table in the south of Beagles Close is high and building will raise it further. It will be very difficult to get home insurance.
- The plans will lead to increased pollution which will in turn gravely and irreversibly harm Begbroke Wood, Pixey and Yarnton Meads (SSSI), and Cassington Meadows. In addition, there is a roost of bats (possibly Noctule bats) living behind Rutten Lane in Yarnton, yellowhammers (RSPB Red List) can be seen on the allotments, hedgehogs and amphibians depend on the green areas and ditches surrounding the village, the return of otters to the Cherwell will be jeopardised, a plethora of old meadow grasses and at least thirty rare species of flowers.
- Threat to allotments where some allotment holders have been working the land for 40+ years: the pollution created by traffic and building work will make the current allotments unpleasant and unsafe areas in which to grow food. The allotments themselves provide habitats for a wide range of wildlife.
- The fields are an important and very well used amenity for village residents and regular visitors providing walks and views of the village towards St Mary's Church.
- This countryside is used by the people of Kidlington, Yarnton and Begbroke as well as many residents of Oxford keen to escape the confines of the city.
- To build on the golf course will be very detrimental to wildlife
- The natural landscape is also very much degraded (even over the past 10 years noticeably so). Plans must be in place to clearly designate wildlife areas within proposed sites to allow wild corridors to thrive.
- Cutteslowe Park, which now forms part of the country, will become just another urban park and that the rural walks north from it will disappear.
- It would be devastating if the rural walks in the area were spoiled.

Brownfield sites

- There are plenty of brown sites in Oxford to be used for housing.
- Oxford City has not made sufficient effort to meet its housing needs on existing brownfield sites, e.g. Oxford Golf area and other sites around the City have not been identified.
- Build on brownfield rather than cheaper GB option

Financial

- It seems a money making project
- CDC will benefit from increased tax revenues
- Merton College are greedy and these houses might be bought by foreign buyers.
- Kidlington is becoming a more and more costly place in which to buy a house. Property developers are delighted to build more profitable homes for London commuters using the new train station.

- This massive development is almost certainly about greed, financial gain and reward for some rather than an honest assessment of the actual need.
- Objection to the fact that this development appears more concerned with money in the pockets of developers than with an egalitarian desire to home people who find it hard to afford homes such as nurses, healthcare assistants, technicians and other low paid workers.

Energy

- The plan does not confront the main issue of reducing carbon emission by at least 6% up to 2031 and beyond. The potential of the land use planning system to reduce carbon emission by 50% will be missed unless addressed coherently and holistically to achieve sustainable development as per the NPPF
- The Plan must mitigate against climate change and contribute to sustainable development (s19 and 92 of the TCPA 2004)
- Increase in pollution

Tourism and Economy

- Thousands of international tourists will come to visit Blenheim Palace and the very rural approach to this national jewel will be marred and defaced forever by merging the villages. It will leave a negative impression on visitors.
- Harmful to the economy with lorries unable to move on the major roads.
- Contrary to its misguided conclusions Blenheim Palace and the grounds does not benefit the community. Many local enterprises have been put out of business.
- Begbroke Science Park to date has provided no obvious service to its surrounding communities, whatsoever!

Officer Response

The level and depth of feeling in these comments have been noted. The majority of the comments raise issues covered under the specific sections/policies responded to above. Where appropriate focussed changes, have been proposed in response to the representations received. The overall view of officers is that the Proposed Submission Plan has been positively prepared and is justified, effective, consistent with national policy and legally compliant.

The number of representations and objections from affected Parish/Town Councils, local communities, their representatives and neighbourhood areas illustrate the level of local concern. The collective weight of local opinion as represented by BYG, KDW and WAG is noted in particular. The overall response to the Proposed Submission Plan (1460 representations) far exceeds that received to the equivalent stages of the adopted Local Plan (approximately 300-400 representations). Nevertheless, the Plan is also produced in the wider public interest of meeting objectively assessed needs and the weight of objections in itself does not invalidate the proposals.

Omission Sites

The following objections were raised to the omission of sites for development from the Plan:

Reasons for objection include:

- The Council's spatial strategy is not sustainable, justified or sound.
- The promoted site is sustainable, as demonstrated in the Council's SA and or evidence base
- Promoters own assessment or evidence shows that the promoted site is sustainable
- The promoted site is more sustainable than those allocated by the Council
- More than 4,400 new homes is needed in the District meaning additional sites are needed
- There would be positive effects and limited adverse impacts resulting from promoted sites.
- Reserve sites should be identified.
- Sites should be allocated elsewhere in the District
- Sites should be located in elsewhere in the Country and County including in Oxford
- Development should take place on brownfield land.
- Land identified in Policy PR3, as removed from the Green Belt, should be allocated for new homes in the Partial Review.

Land north of the Moors (Site 14 and 27) – Bloombridge and others

- The Moors (site PR14) should be included in the Plan for c300 houses, linked to a regeneration package for the village centre and a new 10 hectare country park. In the alternative, it could be specifically listed as a 'safeguarded site' in Policy PR12b, or this policy could be amended to provide for localised Green Belt reviews for housing where planned for sites are not being delivered by 2021.
- This county and country need more houses and this is an ideal location for a number of them.
- This land has never flooded and the drain was enlarged.
- This part of the Green Belt will not be missed and the countryside is more attractive closer to the river.
- Post-war expansion of the village has provided services and facilities.
- Most of those behind the campaign to stop this development live and benefit from the earlier development and now want to stop others enjoying the same.
- This extra building will bring in more revenue for the Council and may stabilise house prices.

A large number of representations were received in support of the Plan not allocating the land north of the Moors (sites PR14 and PR27) reasons give include:

- The land is in the Green Belt, and should be preserved as such.
- Exceptional circumstances need to be demonstrated to release the site from the Green Belt.
- Footpaths on the fields are much used by local walkers contributing to healthy lifestyles.
- Land behind the Moors and Webbs Way is one of the most popular, accessible and necessary interfaces between town and country in Cherwell.
- The site is prone to flooding, and so is unsuitable for building on and will cause flooding downstream.
- The site is historically important and should be protected.
- The site constitutes a landscape of the last remaining unspoilt corner of Kidlington with wide views across fields to the old village.

- The development would have a direct impact especially on the setting of the conservation area of St. Mary's Church and other listed buildings.
- The landscape with its central focus on the spire of St Mary's Church, 'Our Lady's Needle' – as featured in Simon Jenkins' book England's Thousand Best Churches (1999).
- A unique medieval landscape which contains many listed buildings and should not be developed.
- There is a case for making this landscape an amenity for all by formalising it as a 'reserve' akin to, or even part of, the National Trust.
- In the 1990s, the Ministry of the Environment Inspector ruled.... were development ever to take place it would I fear be significantly harmful to this rural end of Kidlington. ... I feel, without question, that it would be most unfortunate if this north-eastern area of the village were ever to be seriously considered for development".
- The sites are a haven for wildlife which development would adversely affect.
- The Kidlington Masterplan Framework refers to the distinctive views, river corridor, landscape and wildlife.
- These fields with their landscape rural views have been enjoyed by many generations and this should continue.
- This is the oldest part of the village and the landscape contributes to its setting.
- Further damage by light pollution is inevitable from new housing.
- The proposed access, via The Moors, would detrimentally impact the road network and create large traffic volumes near a school and nursery.
- Development here will add to existing road congestion.
- Area is already subject to traffic calming and blighted by rat-running.
- This area of the Moors has had an increased volume of traffic plus parking problems since the Moorlands development.
- Follow Bicester healthy town example by protecting these green spaces for physical activity
- Schools are at capacity in the area.

Land adjacent to The Old School House, Church Lane, Yarnton (Site 75) - Carter Jonas LLP for Oxford Centre for Hebrew and Jewish Studies

- Objects to the Plan making process and states that at least part of Site 75 should be allocated for development as a small scale extension to Yarnton.

Shipton on Cherwell (Sites 19 and 29) - David Jarvis Associates on behalf of Shipton Ltd

- Objects to the Plan making process and states that land at Shipton on Cherwell Quarry should be allocated for housing in the Partial Review.

Land east of the Water Eaton Park and Ride – Carter Jonas on behalf of Mr Smith

- Objects to the Plan making process and states that the boundary of site Policy PR6a should be amended to include the land east of the Water Eaton Park and Ride and the land

allocated for residential development or a mix of residential and other uses in the Partial Review.

Land at the former RAF Upper Heyford - Framptons on behalf of E P Barrus and Lone Star Land limited

- Objects to the Plan making process and states that two parcels of land at Upper Heyford should be allocated for housing in the Partial Review.

Site 24 (Begbroke Lane) and site 74 (Land at no 40 and to the rear of 30 to 40 Woodstock Road East – Begbroke) – RPS on behalf of Richard Davies and resident

- Objects to the Plan making process and states that the land at Begbroke should be allocated for housing in the Partial Review.
- If sites 24 and 74 were developed this would have a significant impact on health and the natural environment and would inconsistent with the Council's own policies.

Land to the south of Oxford Motor Park (includes site PR24) - Walsingham Planning on behalf of Oakhill Group Ltd

- Objects to the Plan making process and states that the promoted land should be removed from the Green Belt.

Land at South Newington Road, Bloxham - Define Planning & Design Ltd on behalf of William Davis Ltd

- Objects to the Plan making process and states that the promoted land should be allocated in the Partial Review.

Land south of Tadmarton Road, Bloxham - Planning Prospects

- Objects to the Plan making process and states that the promoted land should be allocated in the Partial Review.

Land at Loop Farm/ Drinkwater, Oxford - Kidlington & Yarnton Labour Party

- Objects to the Plan making process and states that the land above should be allocated in the Partial Review.

Land North and South of Milton Road, Bloxham - Lichfields on behalf of Taylor Wimpey (Oxfordshire)

- Objects to the Plan making process and states that the promoted land should be allocated in the Partial Review.

Land at Islip - Lichfields on behalf of The Church Commissioners for England

- Objects to the Plan making process and states that the promoted land should be allocated for housing in the Partial Review.

South East Kidlington - WYG on behalf of Barwood Development Securities Ltd

- Supports the principle of development at south east Kidlington but and states that the allocated site at south east Kidlington (PR7a) should be extended to allow for additional homes.

Land at New Alchester - WYG on behalf of Bonnar Allan Ltd

- Objects to the Plan making process and states that the promoted land should be allocated in the Partial Review.

Land at Knightsbridge Farm - Carter Jonas on behalf of Sheehan Group of Companies

- Objects to the Plan making process and states that the promoted land should be allocated in the Partial Review.

Land at Knightsbridge Farm - Suzi Coyne Planning on behalf of Sheehan Haulage & Plant Hire

- Objects to the Plan making process and states that the promoted land should be allocated in the Partial Review for employment.

Land south of Sandy Lane - Carter Jonas on behalf of W Lucy & Co Ltd

- Objects to the Plan making process and states that the promoted land should be allocated in the Partial Review.

Land at Frieze Farm - Turnberry on behalf of Exeter College

- Objects to the Plan making process and states that the site should be allocated for new homes.

Land at Gosford Farmhouse - CRJ Anstey Chartered Surveyors on behalf of Mr P Watson and the Trustees of Gosford Trust.

- Objects to the Plan making process and states that the site should be allocated for new homes.

Land at Upper Heyford - Pegasus Group on behalf of the Dorchester Group

- States that land at Upper Heyford should be allocated for new homes as a reserve site.

Land at Webbs Way, Kidlington - West Waddy ADP on behalf of JA Pye (Oxford) Ltd

- Objects to the Plan making process and states that the site should be allocated for new homes.

Land adjoining Dover Avenue and Thornbury Drive, Banbury (PR45) – Bloor Homes

- Objects to the Plan making process and states that the site should be allocated for new homes.

Policy PR3a - Land at 14-16 Woodstock Road, Yarnton - Edgars on behalf of Mr & Mrs Tomes

- Land at 14-16 Woodstock Road, Yarnton should be allocated for development as part of the PR8 allocation.

Policy PR3b – Land adjoining and west of the railway - David Lock on behalf of the Tripartite

- Amend Policy PR3(b) to remove the reference to 0.7 hectares of land adjoining and to the west of the railway and include it as residential land within Policy PR8 and on the Policies Map.

Policy PR3c – Land south of the A34 and west of the railway - Gerald Eve on behalf of Merton College, Oxford

- Supports the policy but states that the site should be allocated for new homes.

Policy PR3c – Land south of the A34 and west of the railway - Savills on behalf of Christchurch, Exeter and Merton Colleges.

- Supports the policy but states that the site should be allocated for new employment.

Land to the east of Warwick Road, Banbury -Turley on behalf of Bovis Homes Ltd

- Objects to the Plan making process and states that the site should be allocated for new homes.

London Oxford Airport - GVA on behalf of Oxford Aviation Services

- Objects to the Plan making process and states that the site should be allocated for new homes.

North West Bicester - Barton Wilmore on behalf of A2Dominion Housing Group Limited

- Objects to the Plan making process and states that land at North West Bicester should be allocated for new homes.

Junction 9 and 10 – M40 – Framptons on behalf of db symmetry

- Objects to the Plan making process which should consider the relationship between housing and employment and land at the Motorway junctions should be allocated for employment development.

Land at Wendlebury – Gleam Investments

- States that the promoted site should be allocated for development.

Skimmingdish Lane, Bicester – Greenlight Developments

- Objects to the Plan making process and states that land at Skimmingdish Lane should be allocated for a Care Home which can contribute towards meeting housing needs.

Land north of Wykham Lane, Banbury - David Lock Associates on behalf of Gallagher Estates

- Objects to the Plan making process and states that the site should be allocated for new homes.

Land at Launton - Pegasus Group on behalf of Richborough Estates

- Objects to the Plan making process and states that the site should be allocated for new homes.

Officer Response

These representations have been considered and noted. Officers are of the view that no changes are required to the Proposed Submission Plan. All reasonable alternatives have been appropriately considered.

Evidence base

General Comments

- There is insufficient evidence to suggest that opportunities to increase capacity at existing allocated housing sites have been robustly tested.
- The evidence base is inaccurate.
- The evidence base highlights negative impacts which the Council have not taken account of in its chosen strategy.
- Studies may not have been completed in time to inform the Plan and/or SA.
- The key findings from the evidence base confirm many of the concerns about the negative impact of development.

PR 04 a-c Strategic Housing Market Assessment (2014)

- The Oxfordshire Strategic Housing Market Assessment (SHMA) is out-dated and should be revisited.

PR 22 - Interim Transport Assessment (2016)

- The Transport Assessment is a large complex document that is difficult for residents to understand and which would have benefitted from a Non-Technical Summary.
- No evidence of properly costed and funded infrastructure improvements to deal with transport issues.
- Changes in some of the RAG metrics used in the Interim Transport Assessment ('ITA') compared to those used in the High-level Transport Assessment have led to favourable outcomes for Areas A and B.

PR 52 - Transport Assessment (2017)

- The TA was completed in July 2017 with missing Appendices added in August 2017.
- There is little or no evidence to suggest that the TA was available in time to inform consideration of options/ formulation of the preferred strategy.
- The SA report does not draw upon the TA, as evidenced by no consideration of the four "development scenarios" that are a focus of the TA.
- Transport evidence base and the associated environmental assessment work is fundamentally unsound and cannot be relied upon. Criticisms include assumptions for car driver mode share, accessibility to sustainable transport and jobs, and lack of modelling to test the effects of closing Sandy Lane.
- The Transport Assessment has modelled based on the successful delivery of all the proposed critical investments listed in Table 8-2 which are undeliverable.
- Sandy Lane closure as a well-used alternative route is not justified.
- The Shipton on Cherwell site should have scored higher in terms of its potential for sustainable transport links. The site is located in close proximity to a range of the proposed future transport investments and due to its size has the potential to provide suitable infrastructure to capitalise on these.
- There are inconsistencies between the Countywide high level transport assessments and the transport assessment for the Partial Review.
- Application of an urban commuting model onto a clearly rural site is unrealistic
- There are errors in the scoring and colouring in the transport assessment.

PR 32 - Cherwell Level 2 Strategic Flood Risk Assessment (2017)

- It is not clear that work was completed in time to inform consideration of options/formulation of the preferred strategy.
- Land at Shipton on Cherwell was not assessed in the Level 2 SFRA but the majority is in flood zone 1 and offers an opportunity for flood alleviation and ecological enhancement.
- The map does not indicate fields that were historically submerged in water in the heavy rains a few years ago.
- Environment Agency - The Level 2 SFRA does not use updated climate change allowances and therefore is not consistent with national planning policy.

PR 34 - Ecological Advice – Cumulative Impacts – June 2017

- Berks, Bucks & Oxon Wildlife Trust - Welcome that comments have been taken on board and that a cumulative impact assessment has been carried out to inform this stage of the process. However note that it only assesses the impact of seven site allocations and does not include other allocations sites in the area such as the Northern gateway and Wolvercote Papermill allocations in the Oxford City boundary. Understand that consideration of sites outside the district boundary might go beyond the remit of this plan, but are concerned that no strategic overview of potential cumulative ecological impacts in the area has been undertaken considering the amount of development taking place.
- Welcome that scoping surveys were carried out but considers they are high level and subject to considerable limitations. Concerned that surveys might not have been done at the optimum survey time and only from Public Rights of Way meaning that some ecological interest might not have been captured and/or missed.
- Feel that the survey information cannot be fully relied upon and more comprehensive surveys might reveal additional ecological interest that will need to be taken into account in the next stage of the site allocation process.
- Aerial photos suggest that some of the meadows proposed for development might comprise grassland of higher conservation value.
- Also note that impacts on Port Meadow SAC and other designated sites downstream is not considered in the report but, assume that this is covered in the Habitats Regulation Assessment (HRA) and Sustainability Appraisal.
- Questions the recommendation which is taken forward by the Council as proposed policy: "Within the proposed Local Nature Reserve (LNR), it is recommended that habitats be restored to SSSI quality which will enhance the value of the LNR as mitigation for any potential negative impacts on the SSSI" as there is no reason to suggest that it will be possible to create a SSSI.

PR 38 - Oxford - Cambridge Expressway Strategic Study

- The implications of the Expressway are not drawn out for the Partial Review.

PR 40 - Cherwell Green Belt Study and Addendum (2017)

- Questions the assessment of the Shipton-on-Cherwell quarry site as it is assessed as high sensitivity yet it is suggested as a location to be removed from the Green Belt.

- The Study included a Green Belt harm assessment which gives Shipton Quarry a rating ranging from high to moderate. The rating for the area to the east of the railway line should be no greater than moderate as it is proposed for ecological enhancement.
- The Addendum is a very brief study with little systematic analysis.
- The Study is not referenced anywhere else in the current consultation material so consultees will be unaware of the Council's reasons for defining precise boundaries.
- The study shows that there will be high/moderately high impacts should the majority of the sites in and around Kidlington be released to meet housing needs.
- For the sites west and north of Yarnton, the Addendum states that the hedgerow boundary to the north is not a strong feature but is consistent with the proposed new settlement edge to the east of the A44. Commentary such as this within an evidence base is not convincing when considering how to manage further growth because it has already been recognised that the proposed boundary does not present a strong feature as such opens up the possibility for challenges in the future.
- Oxford City Council - Notes that Figure 1 in the Addendum indicates an area for removal from the Green Belt that extends across the boundary in Oxford's administrative area. This approach is generally helpful in the context of the work currently also underway on a new Oxford Local Plan, however it is noted that the site area does not align exactly with the area in the Oxford Local Plan Preferred Options Document. The City Council is proposing to remove two small parcels from the Green Belt in this vicinity. The first, at Pear Tree Farm, aligns with Cherwell's study. The second parcel however is more limited than that shown in Figure 1 of the Cherwell study. The Partial Review map should be amended.

PR 43 - Proposed Submission Sustainability Appraisal (2017)

- The SA is supported by various site promoters
- The SA is too high level and broad
- The Plan does not consider the negative effects highlighted by the SA.
- The SA highlights how the Plan should not proceed due to the negative effects.
- Not all reasonable options have been considered
- Promoted sites outside Areas A and B should be assessed.
- The SA fails to report the adverse traffic congestion impact from the proposed development around Begbroke and Yarnton and is therefore flawed.
- The SA ignores the very special circumstances required to remove land from the Green Belt.
- The assessment process is inaccurate and ineffective.
- Other sites should score better and should be removed from Green Belt and allocated.
- The SA is too complex and inaccessible.
- The SA should have assessed parts of sites.

PR 44 – Habitats Regulations Assessment Screening Report – June 2017

- The Plan provides no explanation of why proposed allocations will not lead to an impact on Oxford Meadows SAC and does not reference the potential for in-combination effects. It relies on mitigating effects of the Plan, rather than avoiding them, contrary to the mitigation hierarchy in the NPPF.

PR 48 - Equalities Impact Assessment Screening

- There is no reference to site policies only development management policies.

PR 51 - Landscape Character Sensitivity and Capacity Assessment

- The quality of analysis and assessment is questionable.
- The various conclusions are not tabulated, and hence the step wise process is opaque.
- Analysis often goes beyond analysis of landscape capacity with little or no justification.
- There are numerous seemingly contradictory statements.
- Maps presented in Appendix E are highly inaccessible.
- No account is taken of nearby sensitivities.
- The LCSCA refers to the linear nature of the railway line not lending itself to residential development. Claimed that this linear part of the site is intended to work with the remainder of the Shipton Quarry and as such provides a potential boundary, travel route, recreation area etc. The Illustrative masterplan (included at Appendix 2) demonstrates how the whole site can accommodate residential development in a manner that is sympathetic to its surroundings.

PR 53 - Sequential Test and Exception Test (Flooding) – June 2017

- The report fails to demonstrate that proposed allocation PR8 is sequentially preferable to other options despite the flood risk.

PR 54 - Housing and Economic Land Availability Assessment (HELAA) - August 2017

- The HELAA has not been applied as an initial first step to inform site selection and this explains why it was only made available subsequent to the start of the consultation and in draft form only.
- The role of the HELAA has not been communicated well and has caused considerable confusion.
- General disagreement with the Council's site analysis and conclusions in the HEELA.
- The Government's new Local Authority Housing needs formula should inform the HEELA.
- The report should be more protective of rural settlement areas with a wording change to prioritise infilling and utilise brownfield land.
- Bloxham Parish Council - With regard to promoted land north and south of Milton Road, Bloxham, the draft HELAA has assessed this site as suitable for 'approximately 61 dwellings subject to more detailed consideration'. Taylor Wimpey's blog suggests the site could accommodate 250 homes which would be contrary to planning policy.

PR 71 - Draft Cherwell Water Cycle Study

- It is not clear that the study was completed in time to inform consideration of options/formulation of the preferred strategy and SA.
- EA – Clarification needed to show that there will be no deterioration in the water quality for the receiving watercourses as a result of the extra growth in housing numbers the Plan.

Officer Response

Officers are of the view that, in accordance with the NPPF, the proposed Plan is based on, adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The Plan seeks to ensure an integrated approach to the provision of housing by planning to meet the needs of Oxford within a Cherwell context and within shared economic circumstances. It seeks to respond to relevant market and economic signals (for example, see Cherwell Strategic Economic Growth Study- evidence doc. PR41). Evidence cannot be produced in anticipation of all issues but, as required by the NPPF, it is proportionate. Where required by the statutory bodies updates to the evidence base have been sought.

The evidence base supporting the Plan is published on-line at <https://www.cherwell.gov.uk/info/112/evidence-base/369/local-plan-part-1-partial-review---evidence-base>. The Sustainability Appraisal (Appendices 5-7) includes an account of the most relevant evidence base that has informed the Appraisal process.

Evidence was initially gathered through the Oxfordshire Growth Board to support the examination of Oxford's unmet housing need and its apportionment. It continued through the issues and options stages of plan development to the production of the Proposed Submission document. Strategies, studies and assessments have informed the shaping of the Plan's vision, objectives and policies. They have sometimes, necessarily, informed each other (for example the Transport Assessment informing the Sustainability Appraisal). At each stage (issues, options and proposed submission) the consideration of representations has informed the Plan's development. Officers are of the view that the evidence gathering process has been robust, objective, proportionate and informative.

On some matters, it has been necessary to continue with evidence refinement or the production of supplemental evidence in response to representations received / issues raised.

Appendix 1

Public Notice and Statement of Representation Procedure

LOCAL PLAN DOCUMENTS AVAILABLE FOR INSPECTION

Partial Review of the Cherwell Local Plan 2011-2031 (Part 1): Oxford's Unmet Housing Need - Proposed Submission Documents

Cherwell District Council has prepared a proposed local plan to provide for additional development to help meet Oxford's unmet housing need.

The following documents are available for inspection and comment from **Monday 17 July 2017 to 5pm on Tuesday 29 August 2017**:

1. The local plan which the Council proposes to submit to the Secretary of State for Communities and Local Government
2. Policies maps showing the changes that would be made to the adopted policies map for the district
3. A sustainability appraisal report of the local plan
4. A statement of consultation setting out:
 - i. the bodies and persons previously invited to make representations
 - ii. how those bodies and persons were invited to make such representations
 - iii. a summary of the main issues raised by those representations, and
 - iv. how those main issues have been addressed in the Local Plan
5. Other supporting documents relevant to the preparation of the local plan
6. A statement of the procedure for making representations

Viewing the Documents

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

Cherwell District Council Offices, Bodicote House, Bodicote, Banbury, OX15 4AA,
8.45am - 5.15pm Monday to 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, Thursday and Friday 9am-7pm,
Saturday 9am-4.30pm

Woodgreen Library, Woodgreen Leisure Centre, Woodgreen Avenue, Banbury, OX16 0AT,
Monday 10am-7pm, Wednesday 2pm-5pm, Thursday 10am-1pm, Friday 10am-5pm, Saturday
9.30am-1pm

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

Bicester Library, Franklins House, Wesley Lane, Bicester, OX26 6JU,
Monday 9.30am-7pm, Tuesday 9.30-5pm, Wednesday and Thursday 9.30am-7pm, Friday 9.30am-
5pm, Saturday 9am-4.30pm

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 9am-4.30pm

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

Deddington Library, The Old Court House, Horse Fair, Deddington, OX15 0SH,
Monday 2pm-5pm, 5.30pm-7pm, Wednesday 9.30am-1pm, Thursday
2pm-5pm, 5.30pm-7pm, Saturday 9.30am-1pm

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

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

Bicester LinkPoint, Franklins House, Wesley Lane, Bicester, OX26 6JU,
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

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Submitting Comments

Comments on the documents should be sent:

By email to PlanningPolicyConsultation@cherwell-dc.gov.uk

Or by post to:

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Cherwell District Council, Bodicote House, Bodicote. Banbury, OX15 4AA.

Comments should be received no later than 5pm on Tuesday 29 August 2017. Any comments received will be made publicly available.

In making comments, you may request to be notified of the submission of the local plan for independent examination, the publication of the recommendations of the person appointed to carry out the examination and the adoption of the local plan.

YVONNE REES, JOINT CHIEF EXECUTIVE

LOCAL PLAN DOCUMENTS AVAILABLE FOR INSPECTION

Partial Review of the Cherwell Local Plan 2011-2031 (Part 1): Oxford's Unmet Housing Need - Proposed Submission Documents

Cherwell District Council has prepared a proposed local plan to provide for additional development to help meet Oxford's unmet housing need.

THE CONSULTATION PERIOD HAS BEEN EXTENDED

The following documents are available for inspection and comment from **Monday 17 July 2017 to 5pm on Tuesday 10 October 2017**.

1. The local plan which the Council proposes to submit to the Secretary of State for Communities and Local Government
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YVONNE REES, JOINT CHIEF EXECUTIVE

Appendix 2

Consultation letters/emails

Strategic Planning & the Economy

Adrian Colwell – Head of Strategic Planning & the Economy



*Bodicote House
Bodicote
Banbury
Oxfordshire
OX15 4AA*

www.cherwell.gov.uk

Please ask for Planning Policy Team
Email: planning.policy@cherwell-dc.gov.uk

Direct Dial: 01295 227985
Our Ref: Planning Policy Consultation

13 July 2017

Dear Sir/Madam

Notification of Cherwell District Council Planning Policy Consultation

Partial Review of the Cherwell Local Plan 2011-2031 (Part 1): Oxford's Unmet Housing Need – Availability of Proposed Submission Documents for Inspection

I write to notify you that Cherwell District Council is publishing a proposed Local Plan and supporting documents for inspection and submitting comments.

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Please find enclosed a copy of a 'Statement of the Representations Procedure' which states where and when the documents can be viewed and how to submit representations. We have also arranged a number of public exhibitions, the details of which are provided overleaf.

You have been sent this notification as your contact details are on our Local Plan database. If you no longer wish to be informed of our planning policy consultations then please let us know by telephoning 01295 227985 or by emailing planning.policy@cherwell-dc.gov.uk.

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Yours faithfully

David Peckford

David Peckford Deputy Manager - Planning Policy and Growth Strategy



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**PLANNING AND COMPULSORY PURCHASE ACT 2004
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012
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Partial Review of the Cherwell Local Plan 2011-2031 (Part 1): Oxford's Unmet Housing Need

Proposed Submission Documents Available for Inspection

STATEMENT OF THE REPRESENTATIONS PROCEDURE

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In making comments, you may request to be notified at your specified email or postal address of the submission of the local plan for independent examination, of the publication of the recommendations of the person appointed to carry out the examination, and of the adoption of the local plan.

From: [REDACTED]
Sent: 17 July 2017 09:00
Subject: Notification of Cherwell District Council Planning Policy Consultation
Attachments: Statement of the Representations Procedure - July 2017.pdf

Dear Sir/Madam

Notification of Cherwell District Council Planning Policy Consultation

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David Peckford

David Peckford Deputy Manager - Planning Policy and Growth Strategy

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Strategic Planning & the Economy

Adrian Colwell – Head of Strategic Planning & the Economy



*Bodicote House
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OX15 4AA*

www.cherwell.gov.uk

Please ask for: Planning Policy Team
Email: planning.policy@cherwell-dc.gov.uk

Direct Dial: 01295 227985
Our Ref: Planning Policy Consultation

3 August 2017

Dear Sir/Madam

Notification of Extended Cherwell District Council Planning Policy Consultation

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I write to notify you that Cherwell District Council is extending the period for receiving representations on the Partial Review of the Cherwell Local Plan 2011-2031 (Part 1): Oxford's Unmet Housing Need – Proposed Submission Plan – July 2017 until **5pm on 10 October 2017**.

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From: Planning Policy
Sent: 03 August 2017 18:11
Subject: Notification of Extended Cherwell District Council Planning Policy Consultation
Attachments: Statement of the Representations Procedure.pdf

3 August 2017

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David Peckford

David Peckford
Deputy Manager - Planning Policy and Growth Strategy

Appendix 3

Consultation Summary Leaflet

Cherwell Local Plan 2011 – 2031 (Part 1)

Partial Review – Oxford's Unmet Housing Need

your place • your space
• your say



Proposed Submission Plan - Summary Booklet

July 2017

Cherwell

DISTRICT COUNCIL
NORTH OXFORDSHIRE

The adopted Cherwell Local Plan Part 1 plans for growth to fully meet Cherwell's development needs to 2031. It also commits to a 'Partial Review' of the Plan to help Oxford meet its unmet housing need. We have previously consulted on the issues and options involved in preparing the Partial Review and we also made a 'call for sites'. We are now consulting on our Proposed Submission Plan.

This booklet provides a summary of the proposed Plan – its background, vision, objectives, strategy and policies. It highlights the sites that are proposed for development.

As this is only a summary, we recommend that the full Plan is read. It can be viewed along with supporting documents at: www.cherwell.gov.uk/planningpolicyconsultation. It is also available at Cherwell District Council offices, other locations across the district, and at selected locations in Oxford and West Oxfordshire (see p32).

We would like to know what you think of our proposed Plan. Details of public exhibitions and on how to comment are provided at the end of this booklet.

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

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 adopted Cherwell Local Plan allocates land for growth to meet the level of housing need identified for 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 existing Cherwell Local Plan commits the council to seek to address the unmet housing needs arising from elsewhere in the **Oxfordshire Housing Market Area**, particularly Oxford.

This Partial Review of the Local Plan is effectively an addendum to the existing Local Plan. It will sit alongside it and form part of the statutory Development Plan for the district. It is supported by evidence, community and stakeholder engagement and detailed assessments.

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

Oxford's Unmet Housing Need

The Oxfordshire local authorities have worked together for some time through the **Oxfordshire Growth Board** to identify how Oxford's unmet housing need might best be distributed across the county.

Oxford has a need for about 28,000 homes to be provided from 2011 to 2031.

On 26 September 2016, the Oxfordshire Growth Board decided that Oxford's agreed, unmet housing need (some 15,000 homes) should be apportioned to the Oxfordshire districts as follows:

District	Apportionment – No. of Homes (Net)
Cherwell	4400
Oxford	550
South Oxfordshire*	4950
Vale of White Horse	2200
West Oxfordshire	2750
Total	14,850

**Note: South Oxfordshire District Council did not agree to the apportionment*

Cherwell District Council must test whether a housing requirement of 4,400 dwellings would be appropriate for Cherwell and can be sustainably delivered through its statutory Local Plan process. This consultation is part of that process.

Context for Preparing the Plan

Oxfordshire Context

- The growth of Oxford and countywide planning
- The designation of the Oxford Green Belt to limit Oxford's outward growth
- The economic growth of the county and housing need
- The Oxfordshire Strategic Economic Plan
- The Local Transport Plan (LTP)

Oxford Context

- Development pressures
- Huge demand for market housing
- Pressing need for affordable housing
- Need to support key employment sectors
- Development constraints, scarcity of and competition for land
- Historic environment
- Green Belt
- Oxford Transport Strategy (LTP)
- Relationship between Cherwell and Oxford

Cherwell Context

- Existing communities
- Natural and historic environment
- Local identity
- Traffic and transport
- Delivery of the existing Local Plan strategy

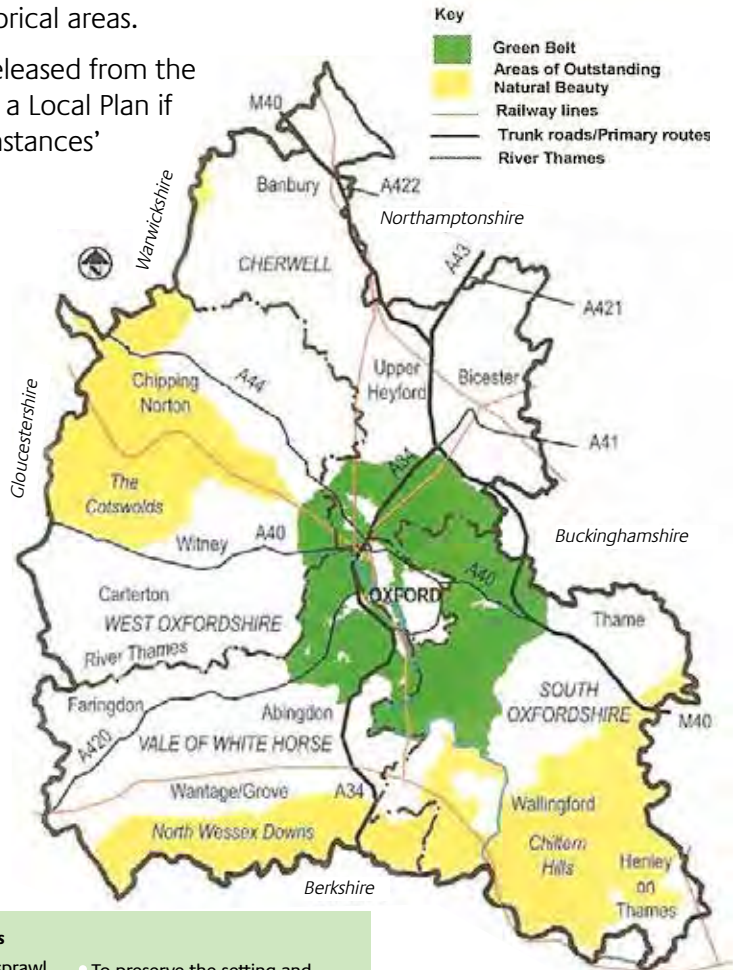
Wider Context

- Growth and planning in West Oxfordshire and Aylesbury
- Constraints such as historic and natural environment and transport
- Oxford-Milton Keynes - Cambridge Corridor

The Oxford Green Belt

The Green Belt provides a generally open setting to the urban area of Oxford and has prevented coalescence with neighbouring towns and villages. It has presented a major constraint on the city's expansion together with the floodplain and sensitive ecological and historical areas.

Land can only be released from the Green Belt through a Local Plan if 'exceptional circumstances' are demonstrated.



The Five Green Belt Purposes

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Our Vision for Meeting Oxford's Unmet Housing Needs

The evidence we have gathered and the consultation feedback we have received, have shaped our proposed vision for meeting Oxford's unmet housing needs.

The vision responds to the specific needs and growth of Oxford, the relationship between housing and employment, and the importance of building sustainable communities that are well related to Oxford and respect the Cherwell context.

Vision for Meeting Oxford's Unmet Housing Needs in Cherwell

To provide new development that meets Oxford's agreed, identified housing needs, supports the city's world-class economy, universities and its local employment base, and ensures that people have convenient, affordable and sustainable travel opportunities to the city's places of work, study and recreation, and to its services and facilities. This development will be provided so that it:

- i. creates balanced and sustainable communities
- ii. is well connected to Oxford
- iii. is of exemplar design which responds distinctively and sensitively to the local built, historic and environmental context
- iv. is supported by necessary infrastructure
- v. provides for a range of household types and incomes reflecting Oxford's diverse needs
- vi. contributes to improving health and well-being, and
- vii. seeks to conserve and enhance the natural environment.

Do you support
this vision?

Our Objectives for Achieving the Vision

The existing Cherwell Local Plan provides fifteen strategic objectives for Cherwell (SO1 to SO15) in the interest of developing a sustainable local economy, for building sustainable communities and for ensuring sustainable development.

We have developed an additional four objectives to specifically achieve the vision for accommodating housing development for Oxford's needs.

Strategic Objective SO16

To work with Oxford City Council and Oxfordshire County Council, and other neighbouring authorities as required, in delivering Cherwell's contribution to meeting Oxford's unmet housing needs with its required infrastructure by 2031.

Strategic Objective SO17

To provide Cherwell's contribution to meeting Oxford's unmet housing needs so that it supports the projected economic growth which underpins the agreed Oxfordshire Strategic Housing Market Assessment 2014 and the local economies of Oxford and Cherwell

Do you
support these
Strategic
Objectives?

Strategic Objective SO18

To provide housing for Oxford so that it substantively provides affordable access to new homes for those requiring 'affordable' housing, new entrants to the housing market, key workers and those requiring access to Oxford's key employment areas, and to provide well designed development that responds to both needs and the local context.

Strategic Objective SO19

To provide Cherwell's contribution to meeting Oxford's unmet housing needs in such a way that it complements the County Council's Local Transport Plan, including where applicable, its Oxford Transport Strategy and so that it facilitates demonstrable and deliverable improvements to the availability of sustainable transport for access to Oxford.

Options Considered in Preparing the Plan

We have examined and consulted upon nine “Areas of Search” in preparing the Plan. They are shown on Figure 1. We considered whether these were suitable for accommodating development for Oxford’s needs individually and in combination:

Option A Kidlington and Surrounding Area

Option B North and East of Kidlington

Option C Junction 9, M40

Option D Arccott

Option E Bicester and Surrounding Area

Option F Former RAF Upper Heyford and Surrounding Area

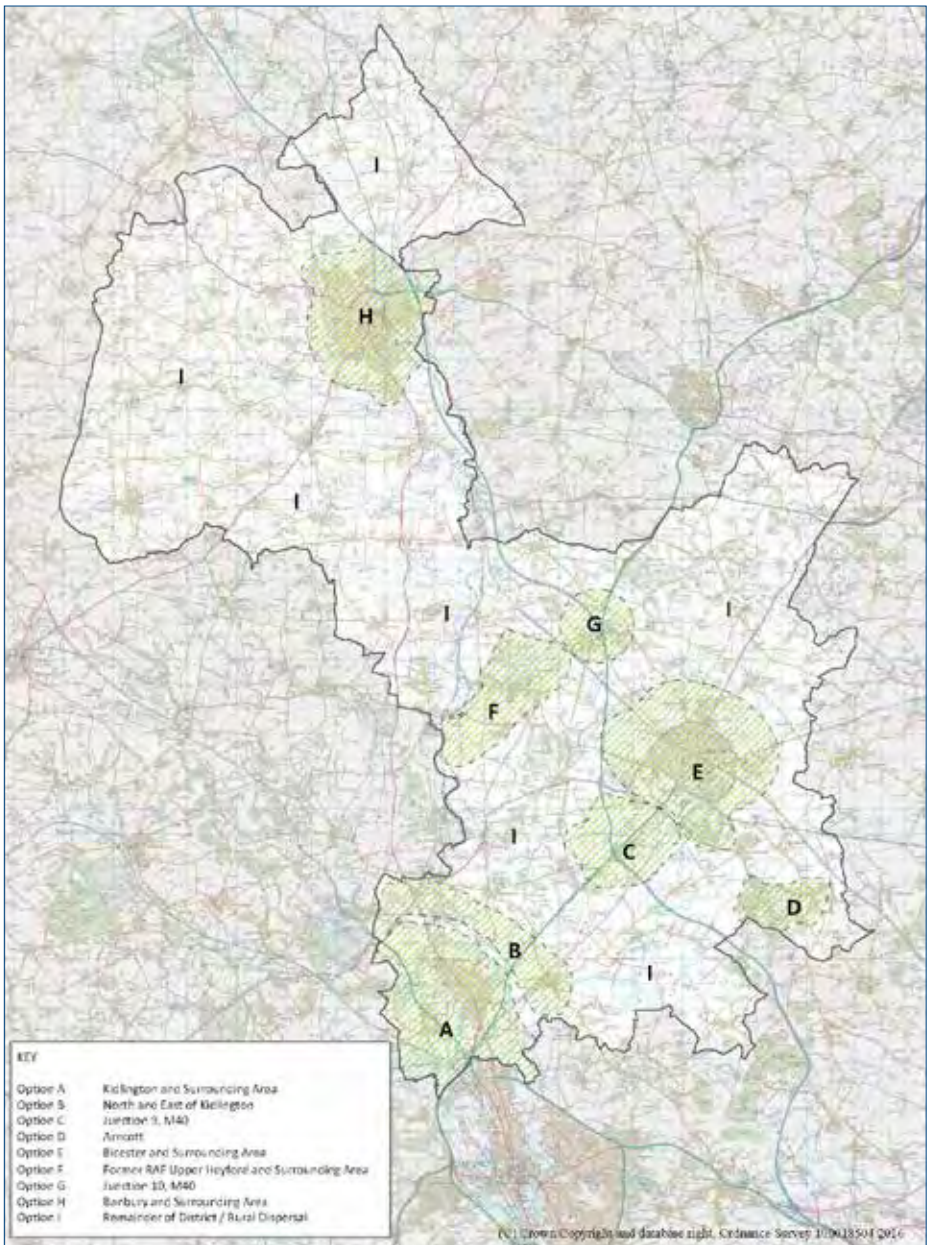
Option G Junction 10, M40

Option H Banbury and Surrounding Area

Option I Remainder of District / Rural Dispersal

Within these Areas of Search were a possible 147 sites each comprising at least two hectares of land.

Figure 1: The Areas of Search Considered




The Rejected Areas of Search

Options C to I were rejected as being unsuitable for meeting Oxford's needs having regard to our evidence base (including a Sustainability Appraisal) and the outcome of consultation and engagement.

The reasons for this are as follows:

Reasons for Rejecting Options C to I

- they were less well situated to build communities associated with Oxford
 - they were less well situated to assist with the delivery of the Oxford Transport Strategy, in terms of existing sustainable travel connectivity and the opportunity for sustainable commuter travel behaviour
 - they were more likely to result in a higher level of commuting to Oxford by private motor vehicle
 - they were likely to result in less affordable transport options for accessing Oxford for potential occupiers of affordable and low cost housing
- 
- more dispersed options provided less opportunity for strategic infrastructure investment (e.g. transport and education)
 - the likelihood that significant additional development could not be built at Bicester, Banbury and former RAF Upper Heyford by 2031 in addition to that in the existing Local Plan

The Selected Areas of Search

Option A (Kidlington and Surrounding Area) and **Option B** (North and East of Kidlington) were considered suitable to meet Oxford's needs and able to deliver the vision and objectives underpinning the Partial Review. The reasons for this are shown on the next page.

Do you agree with these reasons?

Reasons for Selecting Options A and B

- the proximity to Oxford, the existing availability of public transport and the opportunity to maximise the use of sustainable and affordable transport in accessing Oxford's key employment areas and services and facilities
- the opportunity to achieve an overall, proportionate reduction in reliance on the private motor vehicle in accessing Oxford's key employment areas and services and facilities and to achieve further investment in sustainable transport infrastructure
- the deliverability of sustainable transport improvements in comparison to other Areas of Search
- relationship of existing communities to Oxford
- existing economic relationship between the areas of search and Oxford
- the opportunity to provide affordable homes to meet Oxford's identified need close to the source of that need

It was also considered that these options would not significantly undermine the delivery of the development strategy for meeting Cherwell's needs set out in the existing Local Plan.

Site Options within Areas A and B

41 sites within Areas of Search A and B were assessed for inclusion in the Plan. We considered evidence and feedback from consultation. We prepared a **Habitats Regulations Assessment** and a **Sustainability Appraisal** to help consider the likely effects of development and the

cumulative effects of growth. Sites were considered for their suitability in meeting the Plan's vision and objectives. Sites within the Green Belt were only taken forward in the absence of other suitable alternatives.

The Strategy for North Oxford, Kidlington and the A44 Corridor

Our development strategy to meet the vision and objectives is based on

- a coherent, joined-up approach
- prioritising the need for development to be well connected to Oxford
- the need for development to be related to the area of the district that has the strongest economic and social relationships with Oxford
- the need for development to be fully integrated with the County Council's sustainable transport policies
- grasping the opportunities for distinctive place-shaping
- provide a consolidated approach to green infrastructure
- achieving net gains in biodiversity
- not undermining the strategy of the existing Local Plan
- not undermining the delivery of growth already planned at Bicester, Banbury and Former RAF Upper Heyford.

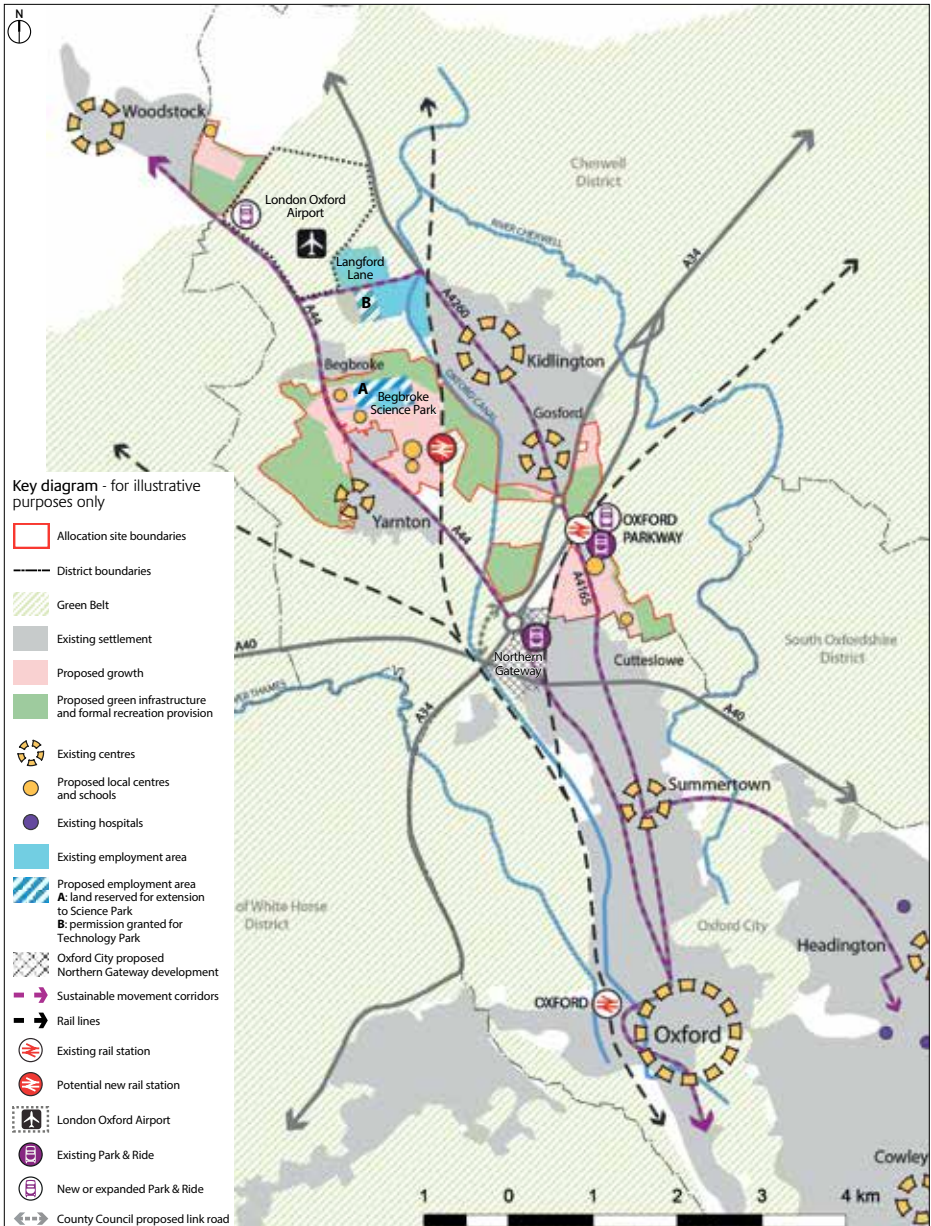
Our new strategy is Oxford specific - to provide homes where people can most readily connect to Oxford and sustainably access the city's employment areas, its universities, its services and facilities and its places of recreation.

To do this, our Plan focuses development in the area immediately north of Oxford, to the south of Kidlington and along the A44 Corridor (see Figure 2).

This directly affects the Cherwell parishes of Gosford and Water Eaton, Kidlington, Yarnton, Begbroke and Shipton-on-Cherwell and Thrupp and neighbouring communities in north Oxford and at Woodstock in West Oxfordshire.



Figure 2: Key Diagram - The Strategy Illustrated



Proposed Strategic Development Sites

We believe that the strategic development sites we have selected best achieve the Plan’s vision and objectives and will achieve sustainable development. The sites are listed below:

Area	Policy / Site	No. of Homes
North Oxford	Policy PR6a – Land East of Oxford Road	650
	Policy PR6b – Land West of Oxford Road	530
	Policy PR6c – Land at Frieze Farm	-
Kidlington	Policy PR7a – Land South East of Kidlington	230
	Policy PR7b – Land at Stratfield Farm	100
Begbroke	Policy PR8 – Land East of the A44	1950
Yarnton	Policy PR9 – Land West of Yarnton	530
Woodstock	Policy PR10 – Land South East of Woodstock	410
Total		4400

Proposed Policies for Delivering the Vision and Objectives

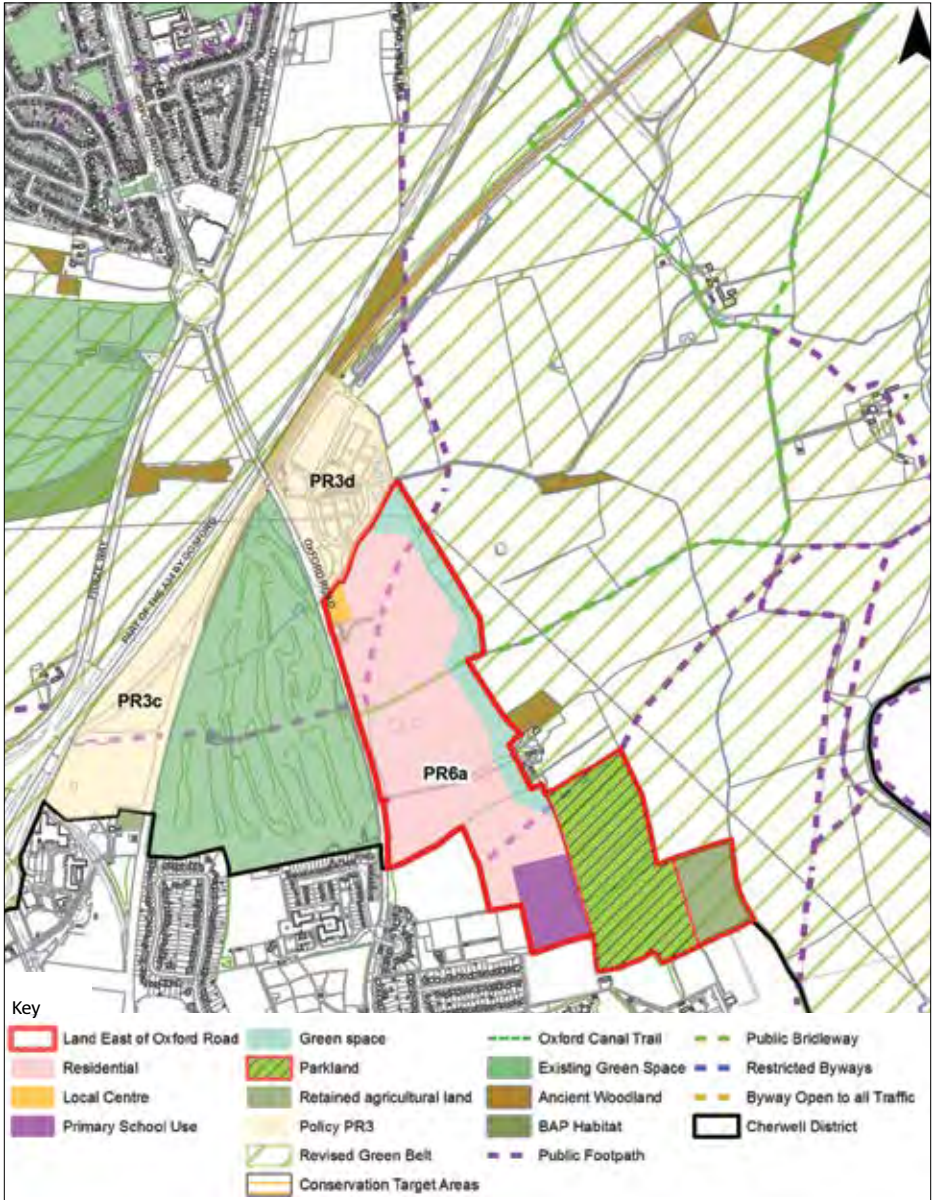
We have also developed policies to ensure that development meets our objectives and achieves sustainable development.



Policy PR1 -	deliver the required homes and achieve sustainable development
Policy PR2 -	deliver a mix, tenure and size of homes to meet needs
Policy PR3 -	allow for exceptional changes to the Green Belt
Policy PR4a -	support affordable and sustainable transportation to Oxford
Policy PR4b -	strengthen Kidlington centre through transport improvements
Policy PR5 -	a consolidated and integrated approach to green infrastructure
Policy PR11 -	ensure infrastructure delivery
Policy PR12a -	ensure the delivery of sites and maintain housing supply
Policy PR12b -	dealing with sites not allocated in the Plan
Policy PR13 -	monitoring and securing delivery

Key Site Proposals

Policy PR6a – Land East of Oxford Road



Policy PR6a – Land East of Oxford Road

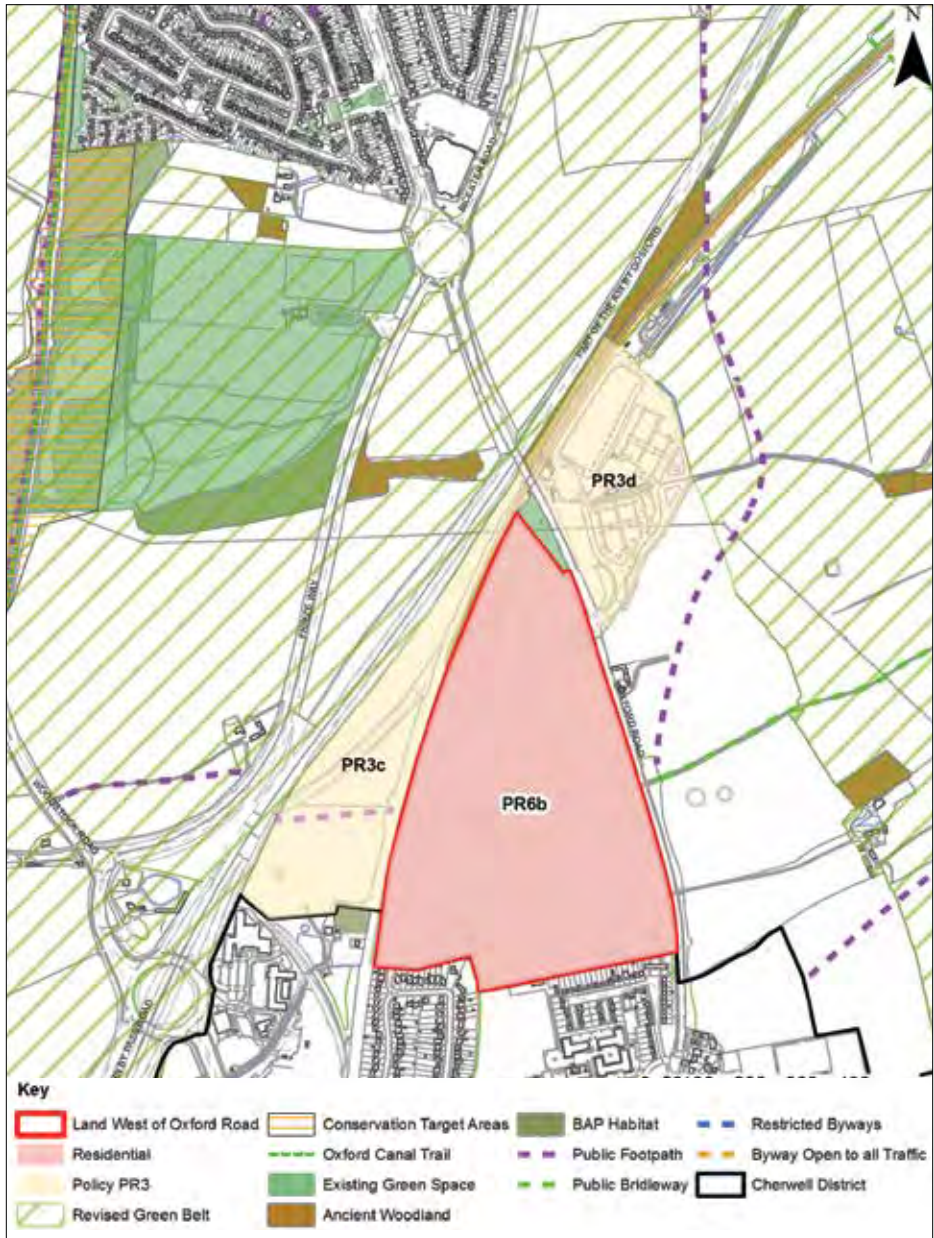
Location: Gosford and Water Eaton Parish, South of the A34, North of Cuttleslowe (Oxford)

Key Proposals:

- integrated urban extension to Oxford
- contemporary design
- 650 homes
- 50% affordable housing
- primary school
- local centre – retail, business, café/restaurant, community building, opportunity for health facilities
- formal sports, play areas and allotments
- public green space / extension to Cuttleslowe Park
- wildlife habitats
- green infrastructure network
- net biodiversity gains
- pedestrian, wheelchair and cycling connectivity
- retention of some agricultural land within the Green Belt
- sustainable travel opportunities
- requirement for a Development Brief and a scheme that responds to the 'gateway' location at the edge of Oxford



Policy PR6b – Land West of Oxford Road



Policy PR6b – Land West of Oxford Road

Location: Gosford and Water Eaton Parish, South of the A34, East of Railway, North of Wolvercote (Oxford)

Key Proposals:

- integrated urban extension to Oxford
- contemporary design
- 530 homes
- 50% affordable housing
- connectivity to land east of Oxford Road and west of the railway
- contributions to delivery of local centre and school to the east of Oxford Road
- formal sports, play areas and allotments
- wildlife corridors
- green infrastructure network
- net biodiversity gains
- scheme for the retention of significant trees, areas of woodland and hedgerows
- pedestrian, wheelchair and cycling connectivity
- sustainable travel opportunities
- requirement for a Development Brief and a scheme that responds to the ‘gateway’ location at the edge of Oxford



Policy PR6c – Land at Frieze Farm



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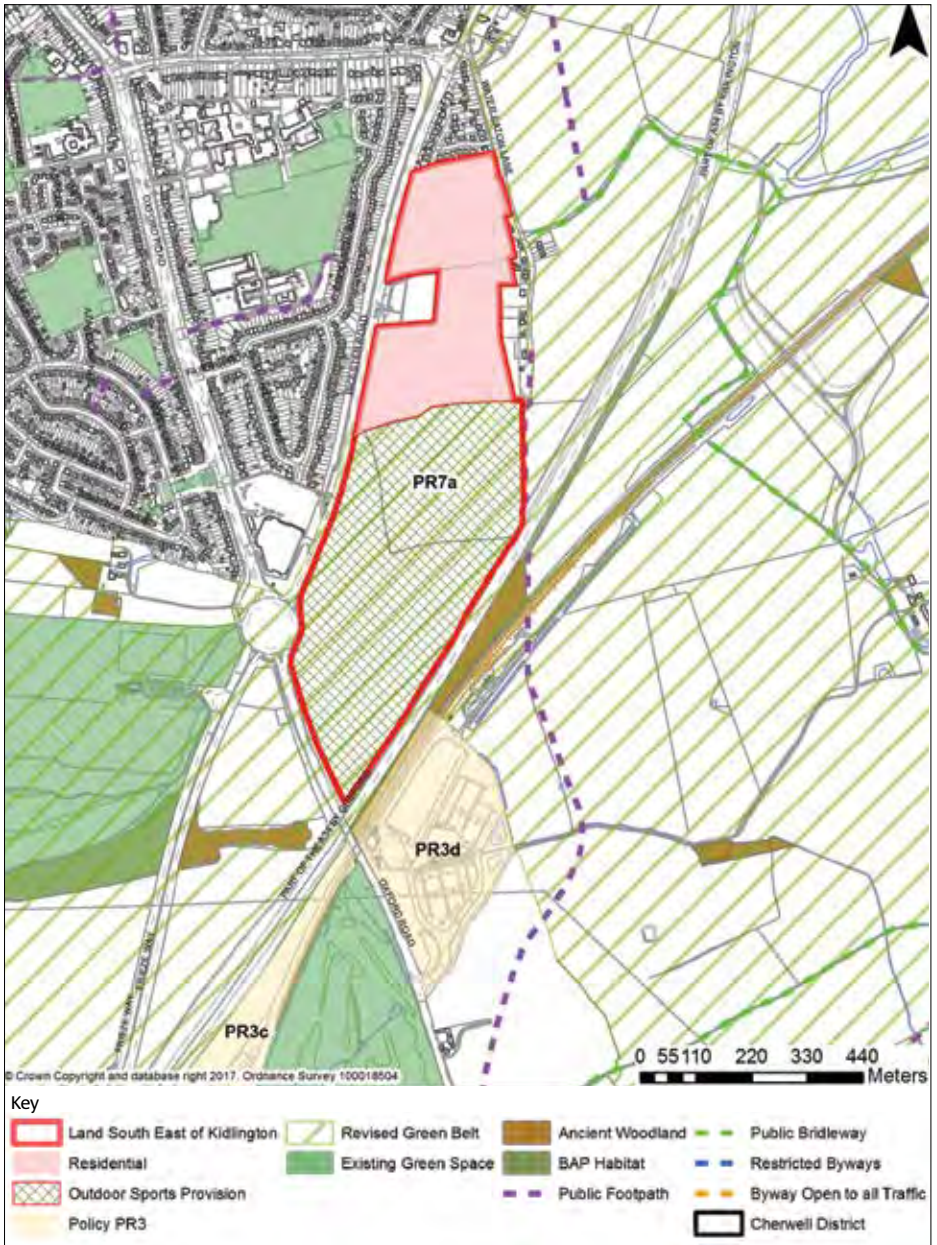
Policy PR6c – Land at Frieze Farm

Location: Gosford and Water Eaton Parish, North of A34 and Peartree Interchange, Between Kidlington and Oxford

Key Proposals:

- reserved site for potential construction of a golf course
- design principles to respond to landscape and Green Belt setting
- requirement for a development brief
- retention within the Green Belt

Policy PR7a – Land South East of Kidlington



Policy PR7a – Land South East of Kidlington

Location: Gosford and Water Eaton Parish, Between Kidlington and Water Eaton Lane

Key Proposals:



- integrated extension to Kidlington
- 230 homes
- 50% affordable housing
- extension to Kidlington cemetery
- formal sports provision including modern facilities for the wider community
- green infrastructure network
- play areas and allotments
- wildlife habitats
- woodland planting
- net biodiversity gains
- retention of some land within the Green Belt
- pedestrian, wheelchair and cycling connectivity
- sustainable travel opportunities
- requirement for a Development Brief and to respect the historic development pattern of Water Eaton Lane



Policy PR7b – Land at Stratfield Farm



Key

	Land at Stratfield Farm		Revised Green Belt		Ancient Woodland		Public Bridleway
	Residential		Conservation Target Areas		BAP Habitat		Restricted Byways
	Green Space		Oxford Canal Trail		Public Footpath		Byway Open to all Traffic
	Nature Conservation Area		Existing Green Space		Cherwell District		

Policy PR7b – Land at Stratfield Farm

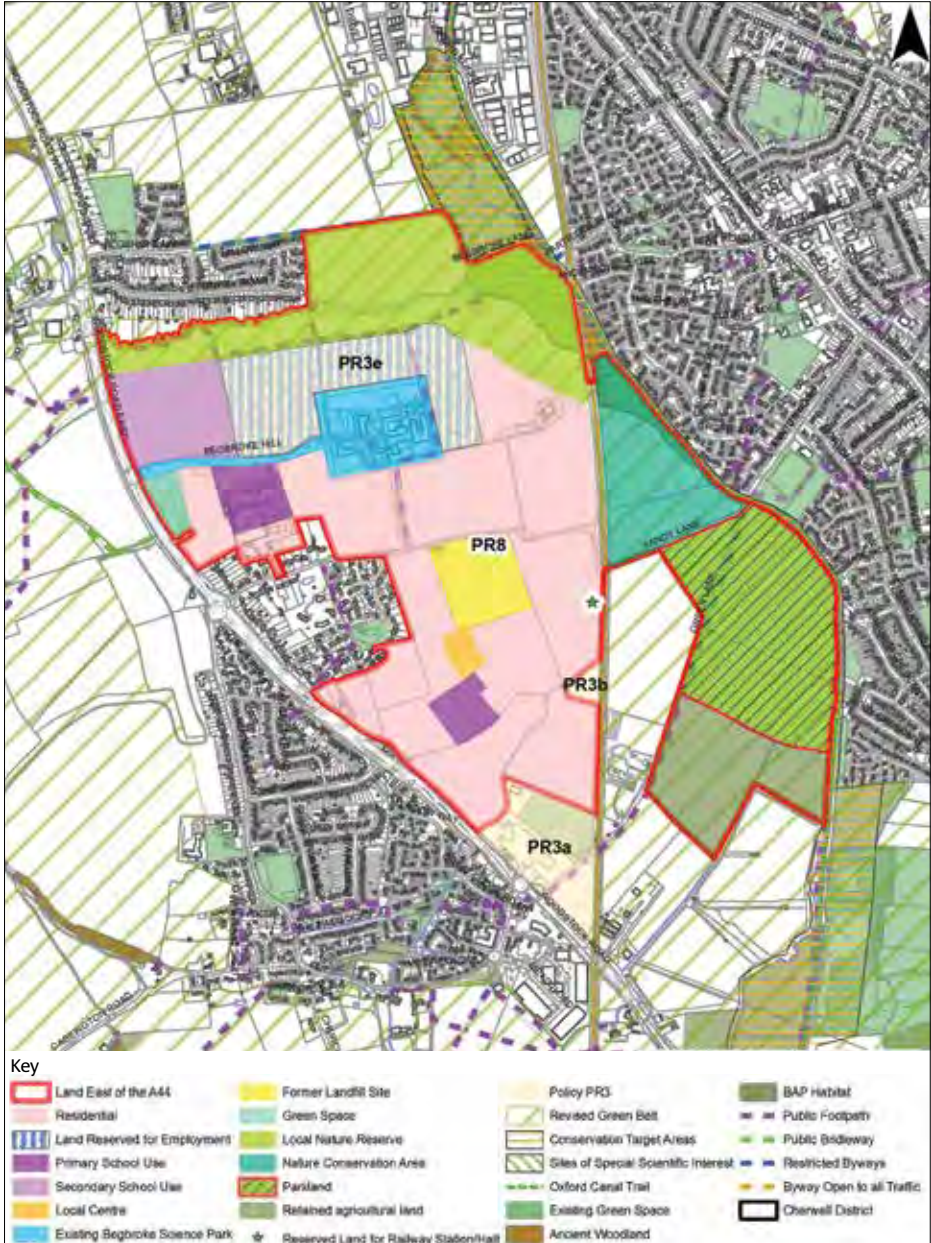
Location: Kidlington Parish, South Kidlington, West of Oxford Road

Key Proposals:

- integrated extension to Kidlington
- 100 homes
- 50% affordable housing
- contributions to secure a foot, cycle and wheelchair accessible bridge over the Oxford Canal
- new green link through the site / over the canal
- play areas and allotments and contributions to formal sports
- improvement of orchard for community benefit
- re-creation / restoration of hedgerows and field pattern
- nature conservation area
- wildlife habitats / corridors
- green infrastructure network
- net biodiversity gains
- enhancement of canal corridor
- protection and enhancement of Conservation Target Area
- retention of some land within the Green Belt
- restoration of Grade II Listed Stratfield Farmhouse
- pedestrian, wheelchair and cycling connectivity
- retention of some agricultural land
- sustainable travel opportunities
- requirement for a Development Brief and a high quality landscape setting



Policy PR8 – Land East of the A44



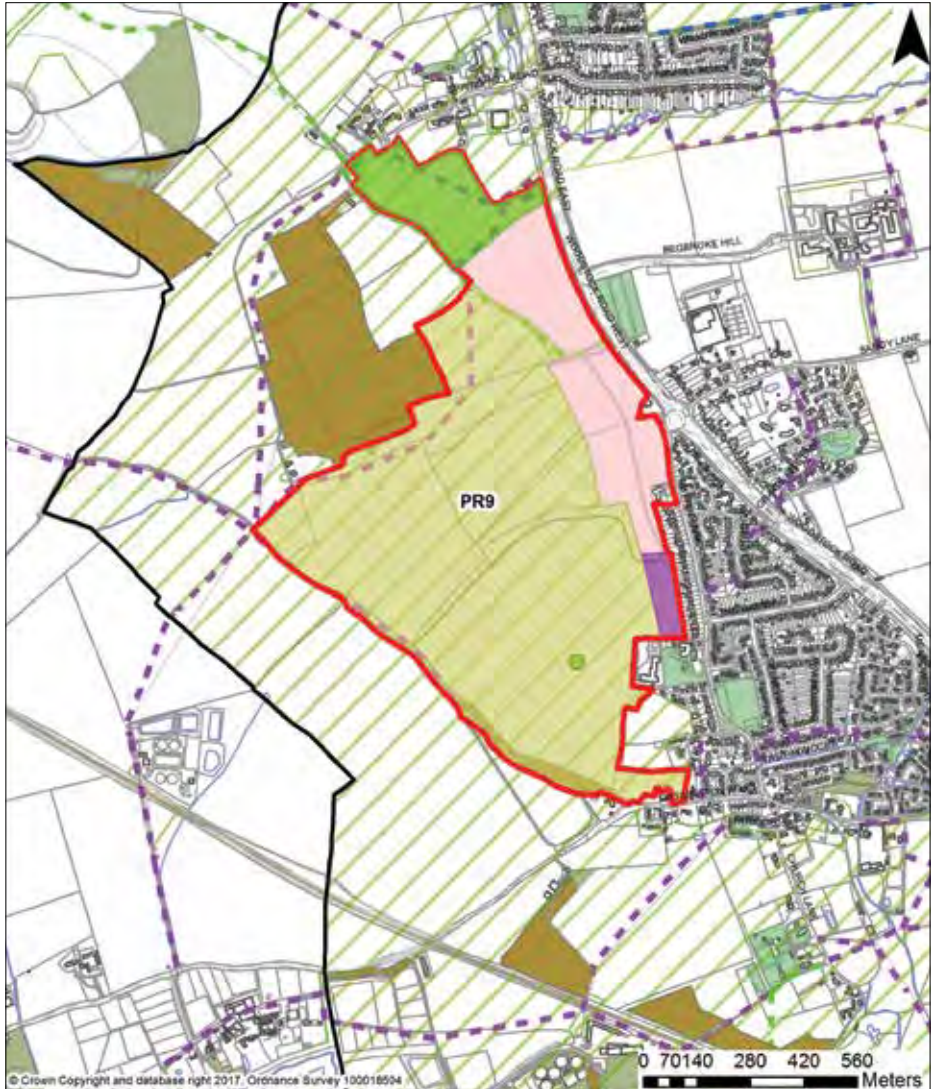
Policy PR8 – Land East of the A44

Location: Yarnton and Begbroke Parishes (small area in Kidlington Parish), Between Yarnton, Begbroke and Kidlington villages

Key Proposals:

- new urban neighbourhood
- 1,950 homes
- 50% affordable housing
- secondary school and primary school(s)
- local centre – retail, business, café/restaurant, community building, opportunity for health facilities
- formal sports and play areas and additional allotments
- Local Nature Reserve along Rowel Brook
- nature conservation area east of the railway
- public open green space / informal canalside parkland
- retention of some agricultural land
- provision for a pedestrian, cycle and wheelchair bridge over the Oxford Canal
- land for future railway halt/station
- land for expansion of Begbroke Science Park
- green infrastructure network
- net biodiversity gains
- improvement of Conservation Target Area (CTA)
- retention of land east of the railway and along Rowel Brook in the Green Belt
- pedestrian, wheelchair and cycling connectivity
- use of Sandy Lane as a green pedestrian, cycle and wheelchair route with railway crossing
- retention of some agricultural land
- sustainable travel opportunities
- remediation and use of landfill site
- requirement for a Development Brief and design which responds to the Science Park and canal location and to historic development of nearby villages

Policy PR9 – Land West of Yarnton



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Policy PR9 – Land West of Yarnton

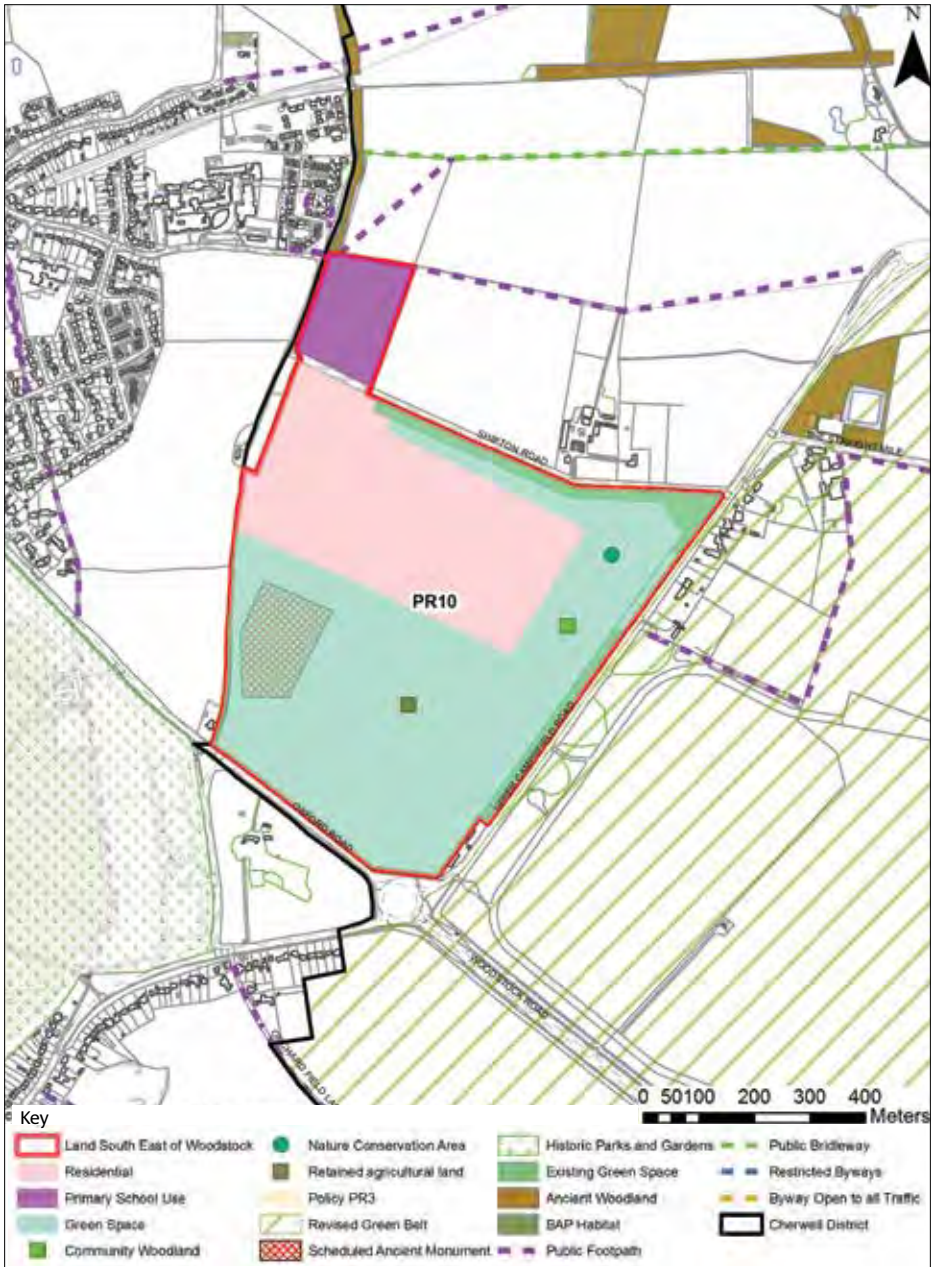
Location: Yarnton and Begbroke Parishes, North and West of Yarnton, South of Begbroke

Key Proposals:

- integrated extension to Yarnton
- 530 homes
- 50% affordable housing
- land for primary school use
- formal sports, play areas and allotments
- Local Nature Reserve accessible to school
- community woodland
- nature conservation area
- wildlife corridors
- green infrastructure network
- net biodiversity gains
- retention of some land within the Green Belt
- pedestrian, wheelchair and cycling connectivity
- retention of some agricultural land
- sustainable travel opportunities
- requirement for a Development Brief and sensitive approach to topography and landscape character



Policy PR10 – Land South East of Woodstock



Policy PR10 – Land South East of Woodstock

Location: Shipton-on-Cherwell and Thrupp Parish. Adjoins West Oxfordshire boundary, South-east of Woodstock, North of Bladon/ East of Blenheim

Key Proposals:

- integrated extension to Woodstock
- 410 homes
- 50% affordable housing
- provision for school facilities
- provision of a community facility
- formal sports, play areas and allotments
- community woodland
- retention of some land in agricultural use
- nature conservation area
- wildlife habitats/corridors
- green infrastructure network
- net biodiversity gains
- pedestrian, wheelchair and cycling connectivity
- sustainable travel opportunities
- requirement for a Development Brief. A scheme that clearly responds to the internationally and nationally significant heritage and proximity of Blenheim Palace and Blenheim Park and their public approaches. A scheme that enhances the built-up edge of Woodstock



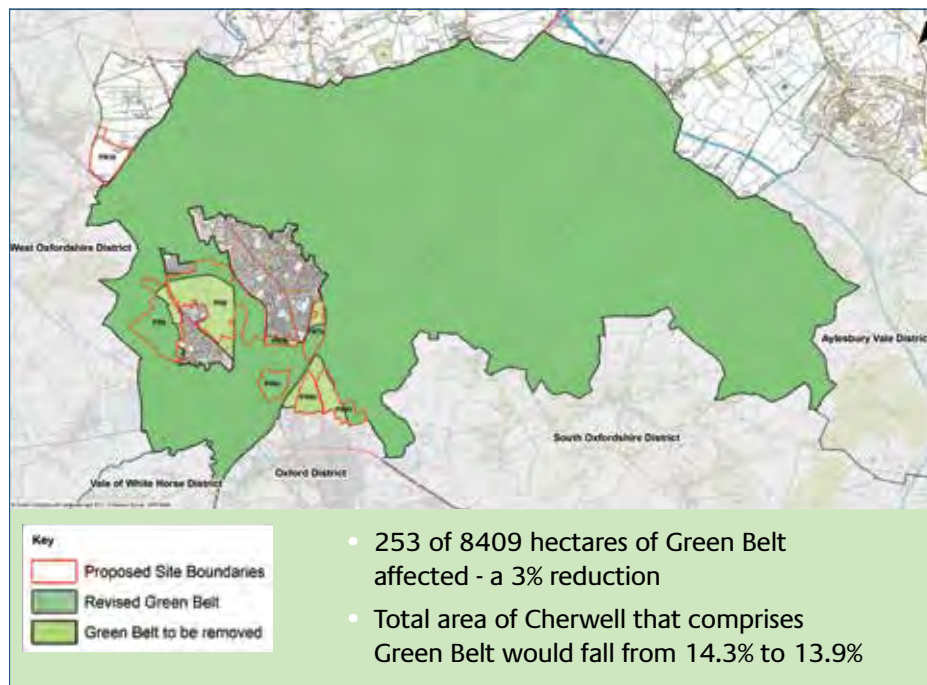
Do you agree with these reasons?

Exceptional Circumstances for Development in the Green Belt

All of the sites we have identified, other than land to the south-east of Woodstock, lie within the Oxford Green Belt. While our proposed policies seek to retain Green Belt land and protect it where possible, we consider that there are exceptional circumstances for the removal of land for development from the Green Belt. In brief these are:

- Oxford's urgent and pressing housing need
- the clear inability for Oxford to fully meet its own needs
- the absence of sustainable, deliverable and appropriate alternative sites
- the relationships between existing communities and the proposed development areas and Oxford
- the relationship of the proposed development areas to Oxford's Northern Gateway site, the University of Oxford's Begbroke Science Park, London-Oxford Airport and the Langford Lane area of Kidlington and the role of these areas in generating housing need
- the unique place shaping potential of land in the vicinity of the University of Oxford's Begbroke Science Park and Oxford canal
- the need for a cautious approach on land outside the Green Belt at Woodstock due to the presence of international and national heritage assets
- the improvement of transport infrastructure in the north Oxford / A44 / A4260 corridor areas
- the strengthening of Kidlington village centre related to sustainable transport improvements
- the opportunity for improvements to the quantity and quality of new public open space, green infrastructure, sport and recreation facilities and in terms of access to the countryside
- the ability to create a sustainable, joined-up vision for the whole of the north Oxford / Kidlington / A44 corridor area

Figure 3: Proposed Changes to the Green Belt





Have your say

Have your say

The Proposed Submission Plan and supporting documents are available at

www.cherwell.gov.uk/planningpolicyconsultation

Forms and guidance for making your comments are also available.

Comments can be made from Monday 17 July 2017 until 5pm on Tuesday 29 August 2017.

Your comments should refer specifically to the Plan. This booklet has only been produced as a guide. You may also wish to consider whether or not the Plan is 'sound' i.e. positively prepared, justified, effective and consistent with national policy.

The Plan is accompanied by a Sustainability Appraisal Report on which comments are also invited.

Copies of the consultation documents are available to view at public libraries across Cherwell, 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 Central Library (presently at 41 Castle Quarter) and at Old Marston and Summertown Libraries. In West Oxfordshire, hard copies are available at the District Council Offices at New Yatt Road, Witney, Woodstock Town Council offices, and at Woodstock Library.

Please email your comments to:

PlanningPolicyConsultation@cherwell-dc.gov.uk

Or send by post to:

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

Your name and contact address (email or postal) are required

You should receive a written acknowledgement. Email acknowledgements will be sent automatically by return.

Acknowledgements by post can be expected within five working days of your response being received.

If you do not receive a written acknowledgement, please contact the Planning Policy team on 01295 227985 to ensure that your comments have been received.

Any comments received will be made publicly available.

Staffed Exhibitions

Wednesday 19 July 2017 - 4pm to 8pm

Shipton-on-Cherwell Village Hall, Shipton-on-Cherwell, Kidlington, OX5 1JP

Friday 21 July 2017 - 4pm to 8pm

Yarnton Village Hall, The Paddocks, Yarnton, Kidlington, OX5 1TE

Thursday 27 July 2017 - 4pm to 8pm

Woodstock Community Centre, 32 New Road, Woodstock, OX20 1PB

Tuesday 1 August 2017 - 3.30pm to 7.30pm

Cuttleslowe Pavillion (next to the café), Cuttleslowe Park, Oxford

Wednesday 2 August 2017 - 4pm to 8pm

Begbroke Village Hall, 3 Begbroke Lane, Begbroke, Kidlington OX5 1RN

Thursday 17 August 2017 - 4pm to 8pm

Exeter Hall, Oxford Road, Kidlington, OX5 1AB

Next Steps

Following consultation on the Plan, it will be submitted to the Secretary of State for independent examination by a Planning Inspector. Your comments will be submitted to the Planning Inspector for consideration.

The purpose of the examination is to consider whether the Local Plan is legally compliant and 'sound' (positively prepared, justified, effective and consistent with national policy). Your comments should therefore refer to those matters.

The main stages for the Plan after this consultation are:

- Submission to Government (Regulation 22)
- Independent Examination (Regulation 24)
- Publication of the Planning Inspector's recommendations (Regulation 25)
- Adoption by the council (Regulation 26)

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.

Habitat Regulations Assessment (HRA) - HRA is required under the European Directive 92/43/ECC on the 'conservation of natural habitats and wild fauna and flora for plans' that may have an impact on European (Natura 2000) Sites. HRA is an assessment of the impacts of implementing a plan or policy on a Natura 2000 site.

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

Oxfordshire Growth Board - a joint committee of local authorities in Oxfordshire and including other non-voting members. Through the Oxfordshire Growth Board the Oxfordshire authorities are working together under the legal 'Duty to Cooperate'.

Oxfordshire Housing Market Area - the sub-regional 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.

Sustainability Appraisal - the process of assessing the economic, social and environmental effects of a proposed plan. This process implements the requirements of a European Directive. Required to be undertaken for all Local Plans.

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

Call: 01295 227985

Cherwell Local Plan 2011 – 2031 (Part 1)

Partial Review – Oxford's Unmet Housing Need

your place • your space
your say



Proposed Submission Plan - Summary Booklet

July 2017 (Updated)

Cherwell

DISTRICT COUNCIL
NORTH OXFORDSHIRE

The adopted Cherwell Local Plan Part 1 plans for growth to fully meet Cherwell’s development needs to 2031. It also commits to a ‘Partial Review’ of the Plan to help Oxford meet its unmet housing need. We have previously consulted on the issues and options involved in preparing the Partial Review and we also made a ‘call for sites’. We are now consulting on our Proposed Submission Plan.

This booklet provides a summary of the proposed Plan – its background, vision, objectives, strategy and policies. It highlights the sites that are proposed for development.

As this is only a summary, we recommend that the full Plan is read. It can be viewed along with supporting documents at: www.cherwell.gov.uk/planningpolicyconsultation. It is also available at Cherwell District Council offices, other locations across the district, and at selected locations in Oxford and West Oxfordshire (see p32).

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Total	14,850

**Note: South Oxfordshire District Council did not agree to the apportionment*

Cherwell District Council must test whether a housing requirement of 4,400 dwellings would be appropriate for Cherwell and can be sustainably delivered through its statutory Local Plan process. This consultation is part of that process.

Context for Preparing the Plan

Oxfordshire Context

- The growth of Oxford and countywide planning
- The designation of the Oxford Green Belt to limit Oxford's outward growth
- The economic growth of the county and housing need
- The Oxfordshire Strategic Economic Plan
- The Local Transport Plan (LTP)

Oxford Context

- Development pressures
- Huge demand for market housing
- Pressing need for affordable housing
- Need to support key employment sectors
- Development constraints, scarcity of and competition for land
- Historic environment
- Green Belt
- Oxford Transport Strategy (LTP)
- Relationship between Cherwell and Oxford

Cherwell Context

- Existing communities
- Natural and historic environment
- Local identity
- Traffic and transport
- Delivery of the existing Local Plan strategy

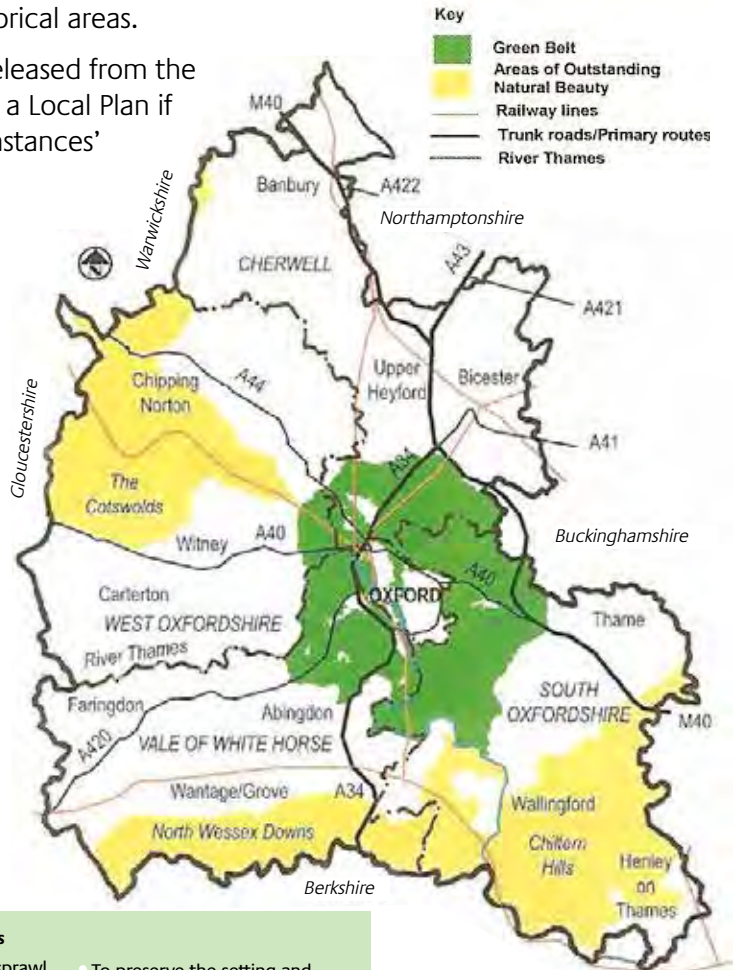
Wider Context

- Growth and planning in West Oxfordshire and Aylesbury
- Constraints such as historic and natural environment and transport
- Oxford-Milton Keynes - Cambridge Corridor

The Oxford Green Belt

The Green Belt provides a generally open setting to the urban area of Oxford and has prevented coalescence with neighbouring towns and villages. It has presented a major constraint on the city's expansion together with the floodplain and sensitive ecological and historical areas.

Land can only be released from the Green Belt through a Local Plan if 'exceptional circumstances' are demonstrated.



The Five Green Belt Purposes

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Our Vision for Meeting Oxford's Unmet Housing Needs

The evidence we have gathered and the consultation feedback we have received, have shaped our proposed vision for meeting Oxford's unmet housing needs.

The vision responds to the specific needs and growth of Oxford, the relationship between housing and employment, and the importance of building sustainable communities that are well related to Oxford and respect the Cherwell context.

Vision for Meeting Oxford's Unmet Housing Needs in Cherwell

To provide new development that meets Oxford's agreed, identified housing needs, supports the city's world-class economy, universities and its local employment base, and ensures that people have convenient, affordable and sustainable travel opportunities to the city's places of work, study and recreation, and to its services and facilities. This development will be provided so that it:

- i. creates balanced and sustainable communities
- ii. is well connected to Oxford
- iii. is of exemplar design which responds distinctively and sensitively to the local built, historic and environmental context
- iv. is supported by necessary infrastructure
- v. provides for a range of household types and incomes reflecting Oxford's diverse needs
- vi. contributes to improving health and well-being, and
- vii. seeks to conserve and enhance the natural environment.

Do you support
this vision?

Our Objectives for Achieving the Vision

The existing Cherwell Local Plan provides fifteen strategic objectives for Cherwell (SO1 to SO15) in the interest of developing a sustainable local economy, for building sustainable communities and for ensuring sustainable development.

We have developed an additional four objectives to specifically achieve the vision for accommodating housing development for Oxford's needs.

Strategic Objective SO16

To work with Oxford City Council and Oxfordshire County Council, and other neighbouring authorities as required, in delivering Cherwell's contribution to meeting Oxford's unmet housing needs with its required infrastructure by 2031.

Strategic Objective SO17

To provide Cherwell's contribution to meeting Oxford's unmet housing needs so that it supports the projected economic growth which underpins the agreed Oxfordshire Strategic Housing Market Assessment 2014 and the local economies of Oxford and Cherwell

Strategic Objective SO18

To provide housing for Oxford so that it substantively provides affordable access to new homes for those requiring 'affordable' housing, new entrants to the housing market, key workers and those requiring access to Oxford's key employment areas, and to provide well designed development that responds to both needs and the local context.

Strategic Objective SO19

To provide Cherwell's contribution to meeting Oxford's unmet housing needs in such a way that it complements the County Council's Local Transport Plan, including where applicable, its Oxford Transport Strategy and so that it facilitates demonstrable and deliverable improvements to the availability of sustainable transport for access to Oxford.

Do you support these Strategic Objectives?

Options Considered in Preparing the Plan

We have examined and consulted upon nine “Areas of Search” in preparing the Plan. They are shown on Figure 1. We considered whether these were suitable for accommodating development for Oxford’s needs individually and in combination:

Option A Kidlington and Surrounding Area

Option B North and East of Kidlington

Option C Junction 9, M40

Option D Arccott

Option E Bicester and Surrounding Area

Option F Former RAF Upper Heyford and Surrounding Area

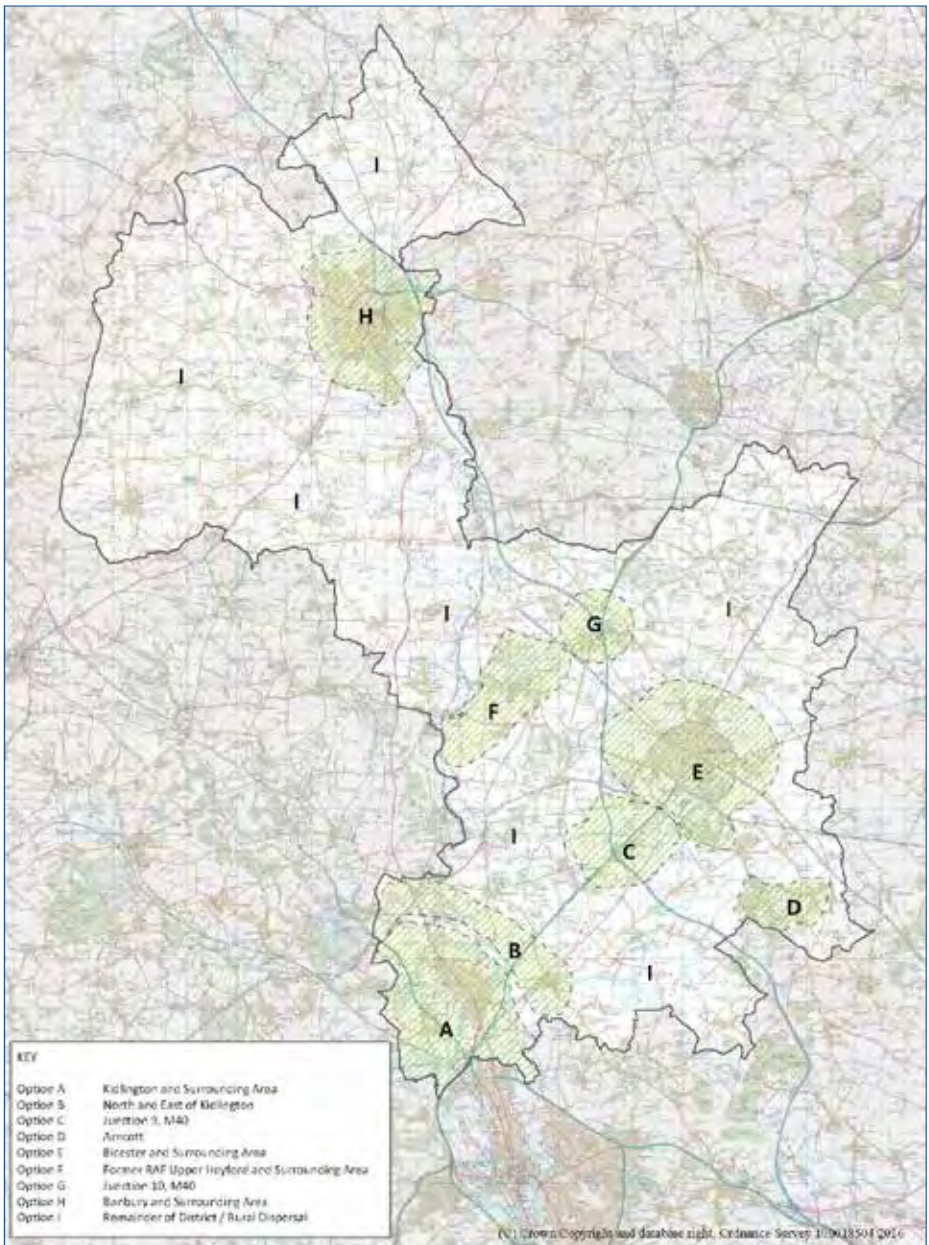
Option G Junction 10, M40

Option H Banbury and Surrounding Area

Option I Remainder of District / Rural Dispersal

Within these Areas of Search were a possible 147 sites each comprising at least two hectares of land.

Figure 1: The Areas of Search Considered



The Rejected Areas of Search

Options C to I were rejected as being unsuitable for meeting Oxford's needs having regard to our evidence base (including a Sustainability Appraisal) and the outcome of consultation and engagement.

The reasons for this are as follows:

Reasons for Rejecting Options C to I

- they were less well situated to build communities associated with Oxford
 - they were less well situated to assist with the delivery of the Oxford Transport Strategy, in terms of existing sustainable travel connectivity and the opportunity for sustainable commuter travel behaviour
 - they were more likely to result in a higher level of commuting to Oxford by private motor vehicle
 - they were likely to result in less affordable transport options for accessing Oxford for potential occupiers of affordable and low cost housing
-
- Do you agree with these reasons?
- more dispersed options provided less opportunity for strategic infrastructure investment (e.g. transport and education)
 - the likelihood that significant additional development could not be built at Bicester, Banbury and former RAF Upper Heyford by 2031 in addition to that in the existing Local Plan

The Selected Areas of Search

Option A (Kidlington and Surrounding Area) and **Option B** (North and East of Kidlington) were considered suitable to meet Oxford's needs and able to deliver the vision and objectives underpinning the Partial Review. The reasons for this are shown on the next page.

Do you agree with these reasons?

Reasons for Selecting Options A and B

- the proximity to Oxford, the existing availability of public transport and the opportunity to maximise the use of sustainable and affordable transport in accessing Oxford's key employment areas and services and facilities
- the opportunity to achieve an overall, proportionate reduction in reliance on the private motor vehicle in accessing Oxford's key employment areas and services and facilities and to achieve further investment in sustainable transport infrastructure
- the deliverability of sustainable transport improvements in comparison to other Areas of Search
- relationship of existing communities to Oxford
- existing economic relationship between the areas of search and Oxford
- the opportunity to provide affordable homes to meet Oxford's identified need close to the source of that need

It was also considered that these options would not significantly undermine the delivery of the development strategy for meeting Cherwell's needs set out in the existing Local Plan.

Site Options within Areas A and B

41 sites within Areas of Search A and B were assessed for inclusion in the Plan. We considered evidence and feedback from consultation. We prepared a **Habitats Regulations Assessment** and a **Sustainability Appraisal** to help consider the likely effects of development and the

cumulative effects of growth. Sites were considered for their suitability in meeting the Plan's vision and objectives. Sites within the Green Belt were only taken forward in the absence of other suitable alternatives.

The Strategy for North Oxford, Kidlington and the A44 Corridor

Our development strategy to meet the vision and objectives is based on

- a coherent, joined-up approach
- prioritising the need for development to be well connected to Oxford
- the need for development to be related to the area of the district that has the strongest economic and social relationships with Oxford
- the need for development to be fully integrated with the County Council's sustainable transport policies
- grasping the opportunities for distinctive place-shaping
- provide a consolidated approach to green infrastructure
- achieving net gains in biodiversity
- not undermining the strategy of the existing Local Plan
- not undermining the delivery of growth already planned at Bicester, Banbury and Former RAF Upper Heyford.

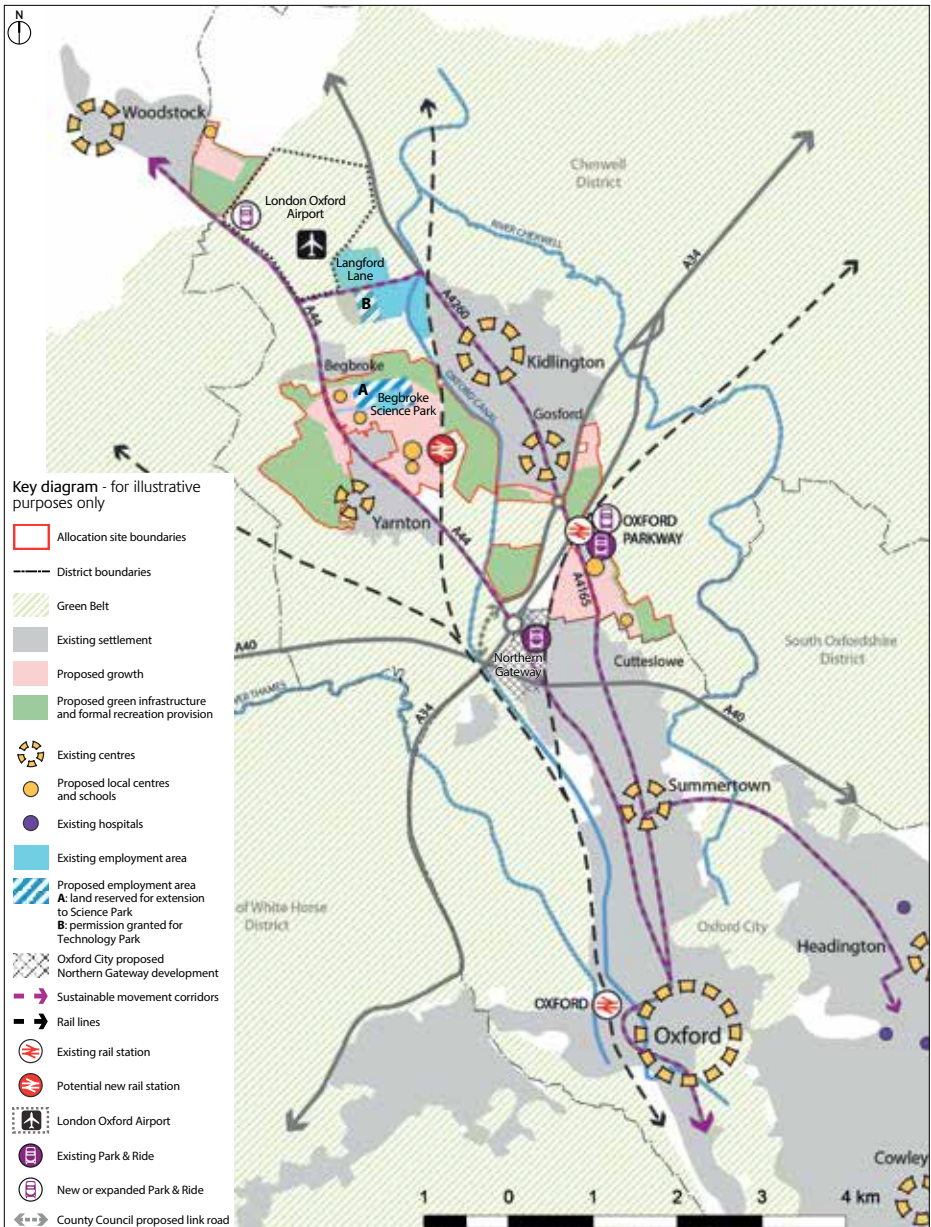
Our new strategy is Oxford specific - to provide homes where people can most readily connect to Oxford and sustainably access the city's employment areas, its universities, its services and facilities and its places of recreation.

To do this, our Plan focuses development in the area immediately north of Oxford, to the south of Kidlington and along the A44 Corridor (see Figure 2).

This directly affects the Cherwell parishes of Gosford and Water Eaton, Kidlington, Yarnton, Begbroke and Shipton-on-Cherwell and Thrupp and neighbouring communities in north Oxford and at Woodstock in West Oxfordshire.



Figure 2: Key Diagram - The Strategy Illustrated



Proposed Strategic Development Sites

We believe that the strategic development sites we have selected best achieve the Plan’s vision and objectives and will achieve sustainable development. The sites are listed below:

Area	Policy / Site	No. of Homes
North Oxford	Policy PR6a – Land East of Oxford Road	650
	Policy PR6b – Land West of Oxford Road	530
	Policy PR6c – Land at Frieze Farm	-
Kidlington	Policy PR7a – Land South East of Kidlington	230
	Policy PR7b – Land at Stratfield Farm	100
Begbroke	Policy PR8 – Land East of the A44	1950
Yarnton	Policy PR9 – Land West of Yarnton	530
Woodstock	Policy PR10 – Land South East of Woodstock	410
Total		4400

Proposed Policies for Delivering the Vision and Objectives

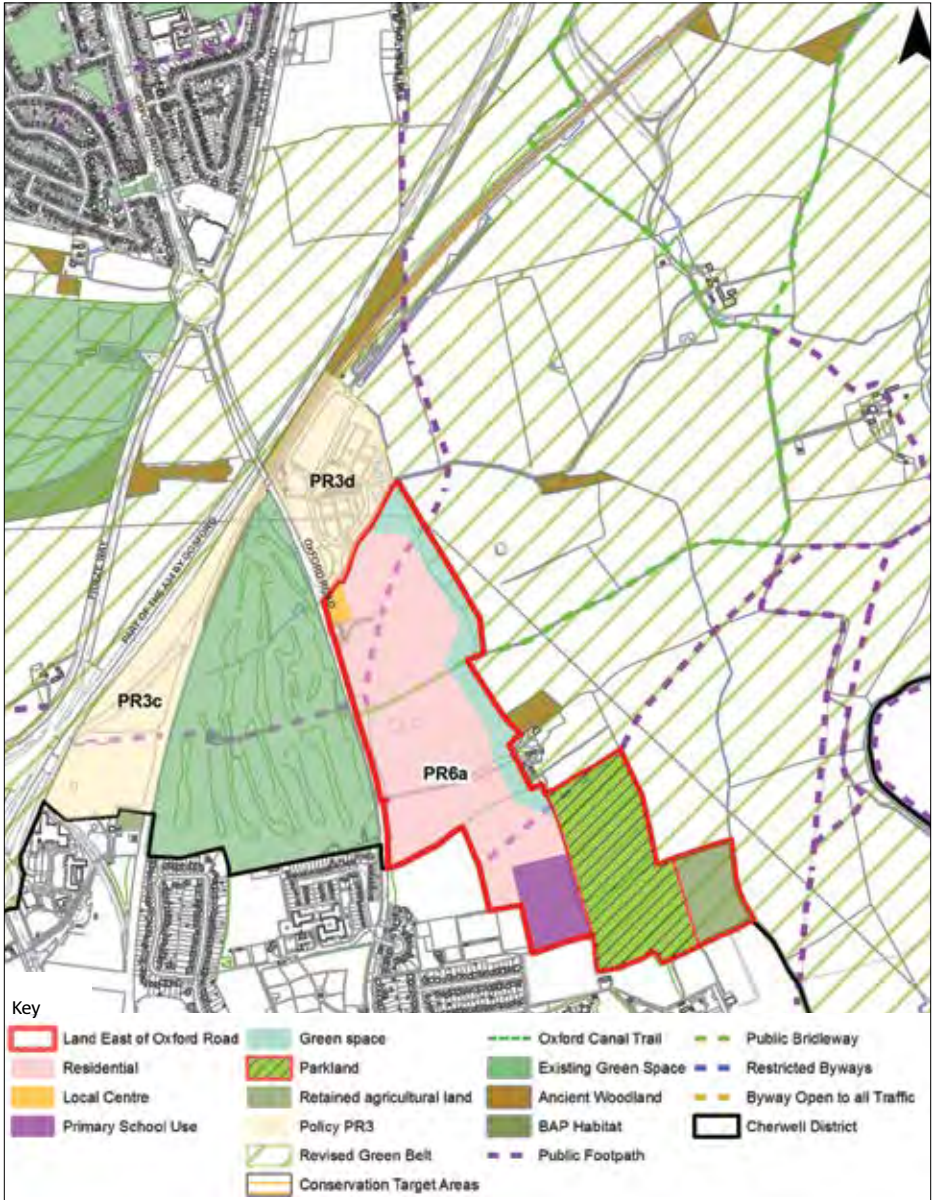
We have also developed policies to ensure that development meets our objectives and achieves sustainable development.



Policy PR1 -	deliver the required homes and achieve sustainable development
Policy PR2 -	deliver a mix, tenure and size of homes to meet needs
Policy PR3 -	allow for exceptional changes to the Green Belt
Policy PR4a -	support affordable and sustainable transportation to Oxford
Policy PR4b -	strengthen Kidlington centre through transport improvements
Policy PR5 -	a consolidated and integrated approach to green infrastructure
Policy PR11 -	ensure infrastructure delivery
Policy PR12a -	ensure the delivery of sites and maintain housing supply
Policy PR12b -	dealing with sites not allocated in the Plan
Policy PR13 -	monitoring and securing delivery

Key Site Proposals

Policy PR6a – Land East of Oxford Road



Policy PR6a – Land East of Oxford Road

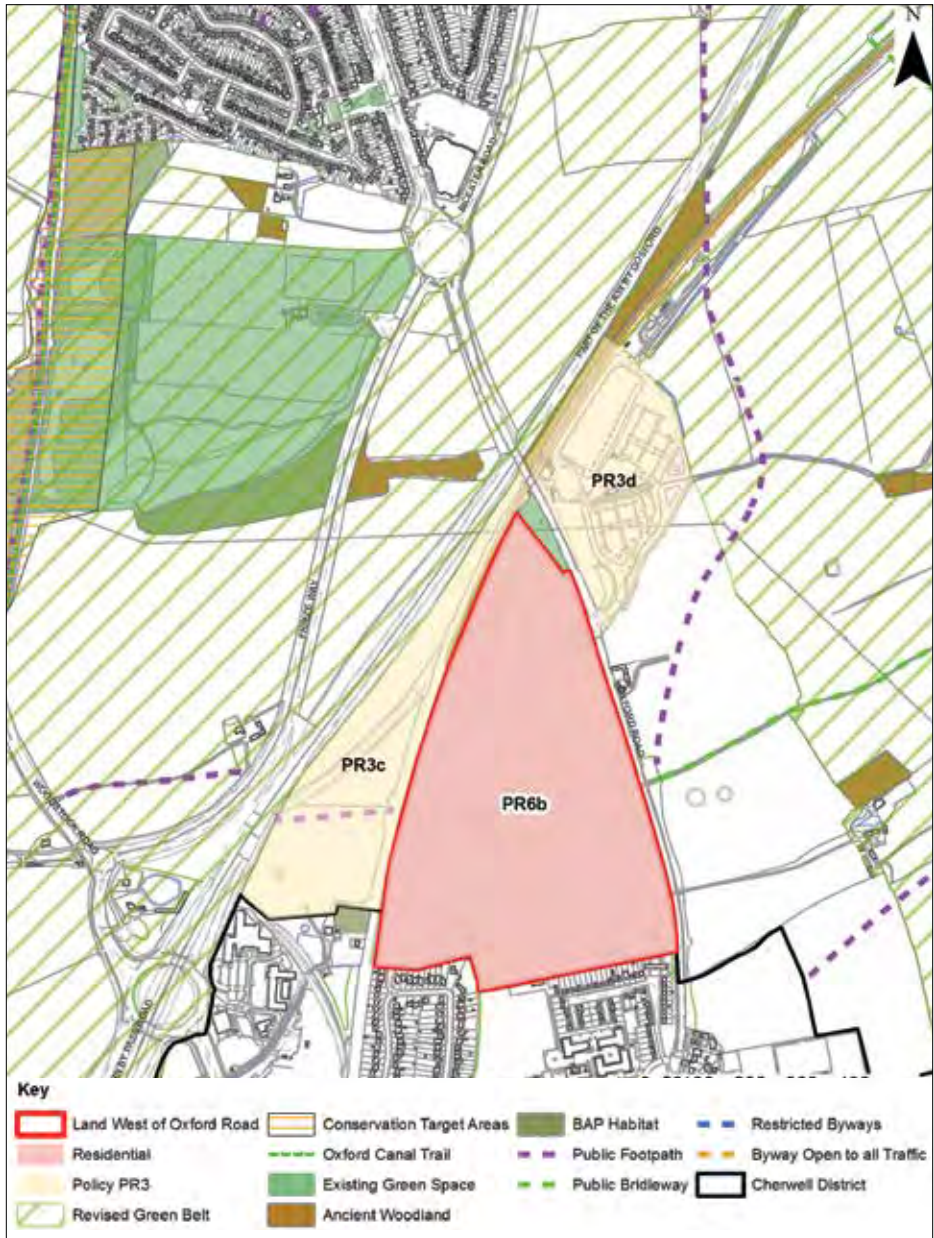
Location: Gosford and Water Eaton Parish, South of the A34, North of Cuttleslowe (Oxford)

Key Proposals:

- integrated urban extension to Oxford
- contemporary design
- 650 homes
- 50% affordable housing
- primary school
- local centre – retail, business, café/restaurant, community building, opportunity for health facilities
- formal sports, play areas and allotments
- public green space / extension to Cuttleslowe Park
- wildlife habitats
- green infrastructure network
- net biodiversity gains
- pedestrian, wheelchair and cycling connectivity
- retention of some agricultural land within the Green Belt
- sustainable travel opportunities
- requirement for a Development Brief and a scheme that responds to the 'gateway' location at the edge of Oxford



Policy PR6b – Land West of Oxford Road



Policy PR6b – Land West of Oxford Road

Location: Gosford and Water Eaton Parish, South of the A34, East of Railway, North of Wolvercote (Oxford)

Key Proposals:

- integrated urban extension to Oxford
- contemporary design
- 530 homes
- 50% affordable housing
- connectivity to land east of Oxford Road and west of the railway
- contributions to delivery of local centre and school to the east of Oxford Road
- formal sports, play areas and allotments
- wildlife corridors
- green infrastructure network
- net biodiversity gains
- scheme for the retention of significant trees, areas of woodland and hedgerows
- pedestrian, wheelchair and cycling connectivity
- sustainable travel opportunities
- requirement for a Development Brief and a scheme that responds to the ‘gateway’ location at the edge of Oxford



Policy PR6c – Land at Frieze Farm



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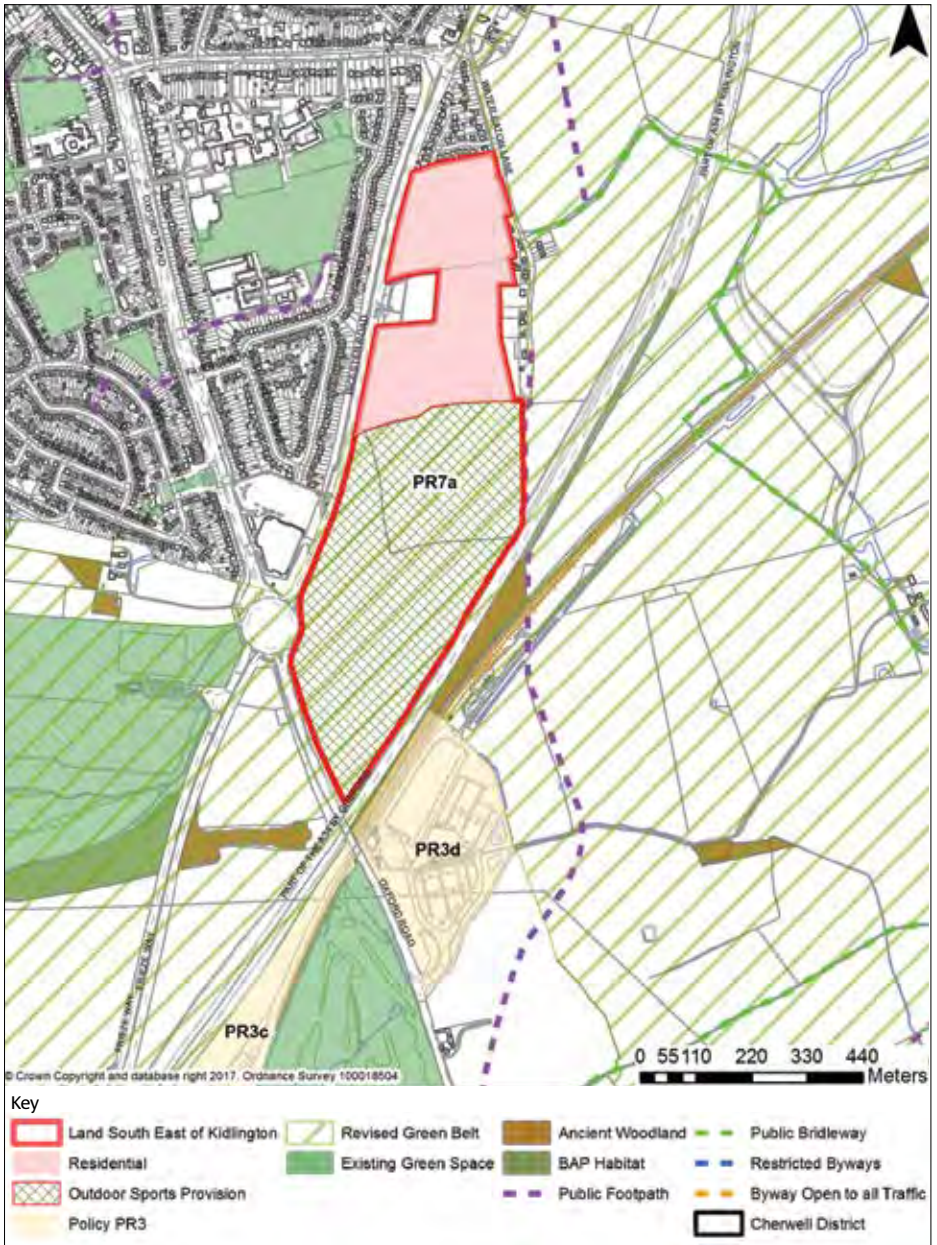
Policy PR6c – Land at Frieze Farm

Location: Gosford and Water Eaton Parish, North of A34 and Peartree Interchange, Between Kidlington and Oxford

Key Proposals:

- reserved site for potential construction of a golf course
- design principles to respond to landscape and Green Belt setting
- requirement for a development brief
- retention within the Green Belt

Policy PR7a – Land South East of Kidlington



Policy PR7a – Land South East of Kidlington

Location: Gosford and Water Eaton Parish, Between Kidlington and Water Eaton Lane

Key Proposals:

- integrated extension to Kidlington
- 230 homes
- 50% affordable housing
- extension to Kidlington cemetery
- formal sports provision including modern facilities for the wider community
- green infrastructure network
- play areas and allotments
- wildlife habitats
- woodland planting
- net biodiversity gains
- retention of some land within the Green Belt
- pedestrian, wheelchair and cycling connectivity
- sustainable travel opportunities
- requirement for a Development Brief and to respect the historic development pattern of Water Eaton Lane



Policy PR7b – Land at Stratfield Farm



Key

Land at Stratfield Farm	Revised Green Belt	Ancient Woodland	Public Bridleway
Residential	Conservation Target Areas	BAP Habitat	Restricted Byways
Green Space	Oxford Canal Trail	Public Footpath	Byway Open to all Traffic
Nature Conservation Area	Existing Green Space	Cherwell District	

Policy PR7b – Land at Stratfield Farm

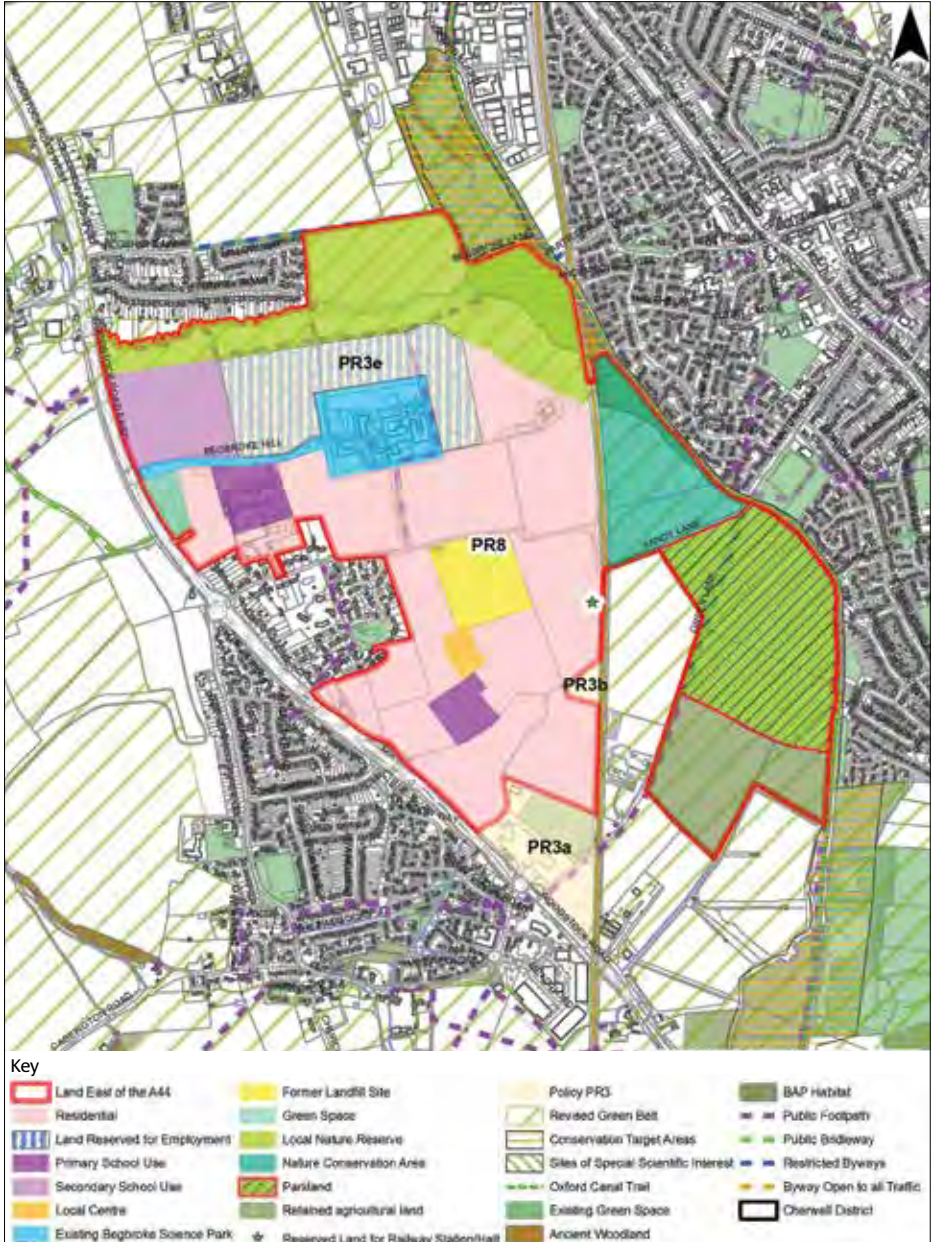
Location: Kidlington Parish, South Kidlington, West of Oxford Road

Key Proposals:

- integrated extension to Kidlington
- 100 homes
- 50% affordable housing
- contributions to secure a foot, cycle and wheelchair accessible bridge over the Oxford Canal
- new green link through the site / over the canal
- play areas and allotments and contributions to formal sports
- improvement of orchard for community benefit
- re-creation / restoration of hedgerows and field pattern
- nature conservation area
- wildlife habitats / corridors
- green infrastructure network
- net biodiversity gains
- enhancement of canal corridor
- protection and enhancement of Conservation Target Area
- retention of some land within the Green Belt
- restoration of Grade II Listed Stratfield Farmhouse
- pedestrian, wheelchair and cycling connectivity
- retention of some agricultural land
- sustainable travel opportunities
- requirement for a Development Brief and a high quality landscape setting



Policy PR8 – Land East of the A44



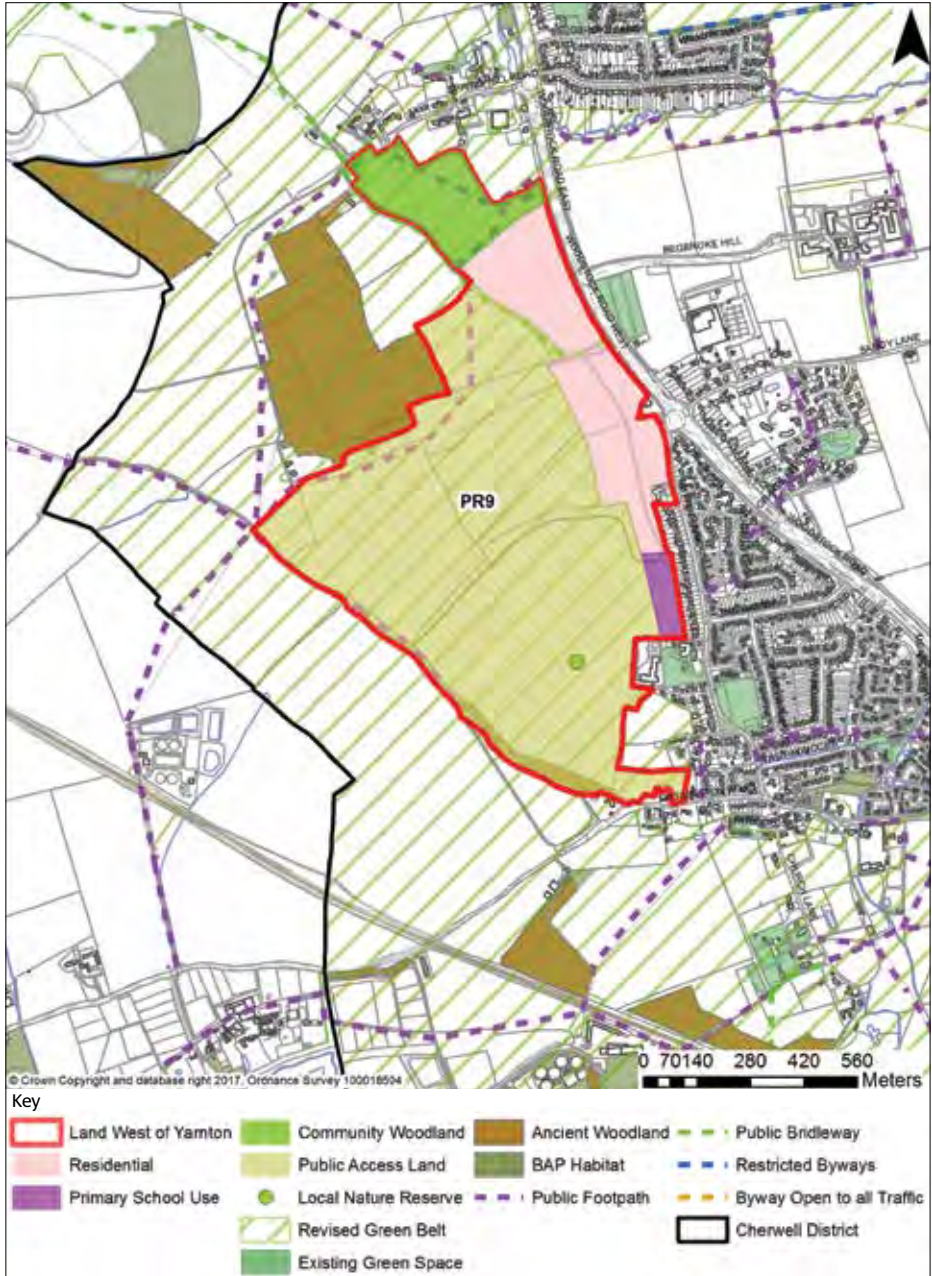
Policy PR8 – Land East of the A44

Location: Yarnton and Begbroke Parishes (small area in Kidlington Parish), Between Yarnton, Begbroke and Kidlington villages

Key Proposals:

- new urban neighbourhood
- 1,950 homes
- 50% affordable housing
- secondary school and primary school(s)
- local centre – retail, business, café/restaurant, community building, opportunity for health facilities
- formal sports and play areas and additional allotments
- Local Nature Reserve along Rowel Brook
- nature conservation area east of the railway
- public open green space / informal canalside parkland
- retention of some agricultural land
- provision for a pedestrian, cycle and wheelchair bridge over the Oxford Canal
- land for future railway halt/station
- land for expansion of Begbroke Science Park
- green infrastructure network
- net biodiversity gains
- improvement of Conservation Target Area (CTA)
- retention of land east of the railway and along Rowel Brook in the Green Belt
- pedestrian, wheelchair and cycling connectivity
- use of Sandy Lane as a green pedestrian, cycle and wheelchair route with railway crossing
- retention of some agricultural land
- sustainable travel opportunities
- remediation and use of landfill site
- requirement for a Development Brief and design which responds to the Science Park and canal location and to historic development of nearby villages

Policy PR9 – Land West of Yarnton



Policy PR9 – Land West of Yarnton

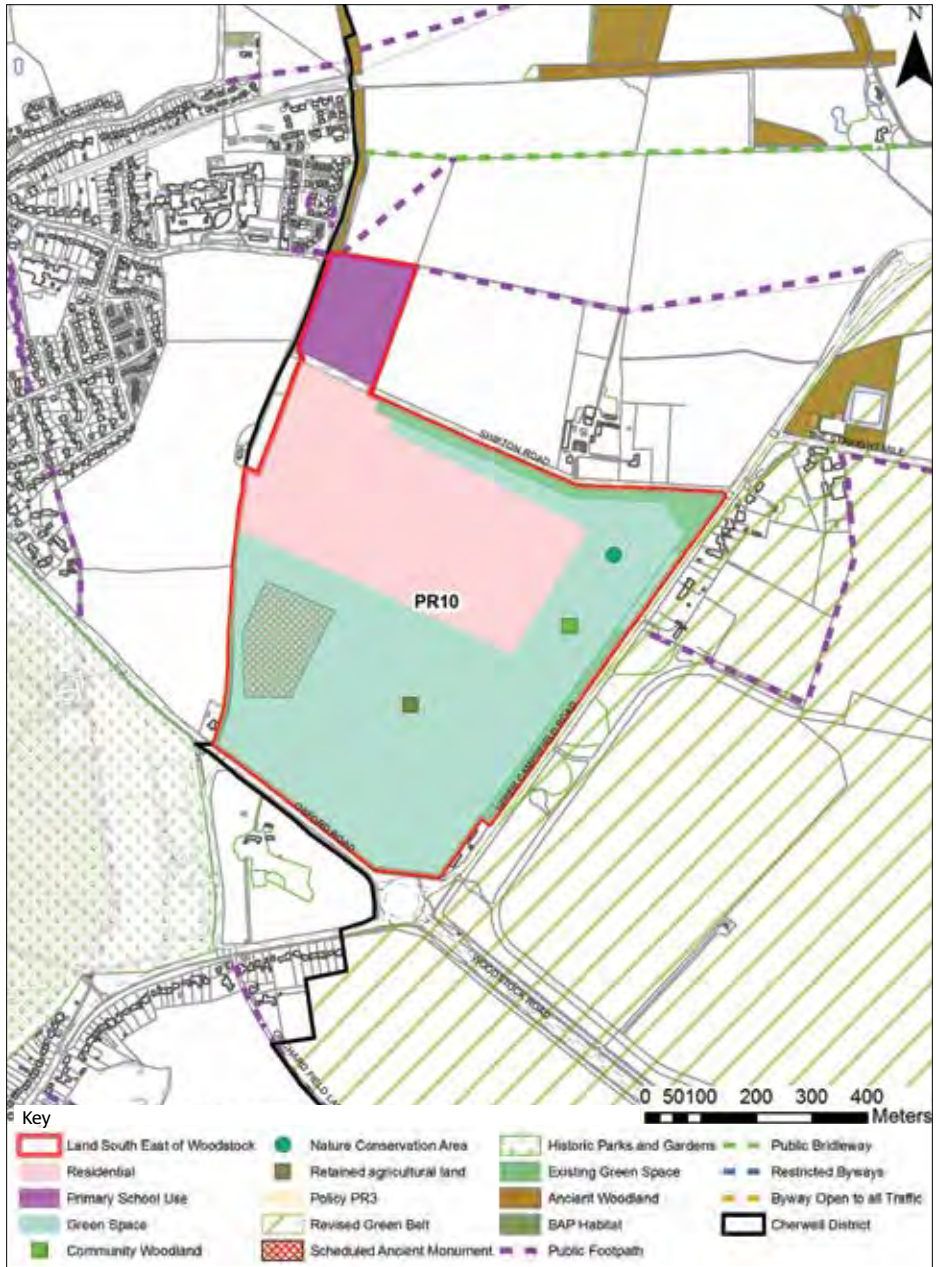
Location: Yarnton and Begbroke Parishes, North and West of Yarnton, South of Begbroke

Key Proposals:

- integrated extension to Yarnton
- 530 homes
- 50% affordable housing
- land for primary school use
- formal sports, play areas and allotments
- Local Nature Reserve accessible to school
- community woodland
- nature conservation area
- wildlife corridors
- green infrastructure network
- net biodiversity gains
- retention of some land within the Green Belt
- pedestrian, wheelchair and cycling connectivity
- retention of some agricultural land
- sustainable travel opportunities
- requirement for a Development Brief and sensitive approach to topography and landscape character



Policy PR10 – Land South East of Woodstock



Policy PR10 – Land South East of Woodstock

Location: Shipton-on-Cherwell and Thrupp Parish. Adjoins West Oxfordshire boundary, South-east of Woodstock, North of Bladon/ East of Blenheim

Key Proposals:

- integrated extension to Woodstock
- 410 homes
- 50% affordable housing
- provision for school facilities
- provision of a community facility
- formal sports, play areas and allotments
- community woodland
- retention of some land in agricultural use
- nature conservation area
- wildlife habitats/corridors
- green infrastructure network
- net biodiversity gains
- pedestrian, wheelchair and cycling connectivity
- sustainable travel opportunities
- requirement for a Development Brief. A scheme that clearly responds to the internationally and nationally significant heritage and proximity of Blenheim Palace and Blenheim Park and their public approaches. A scheme that enhances the built-up edge of Woodstock



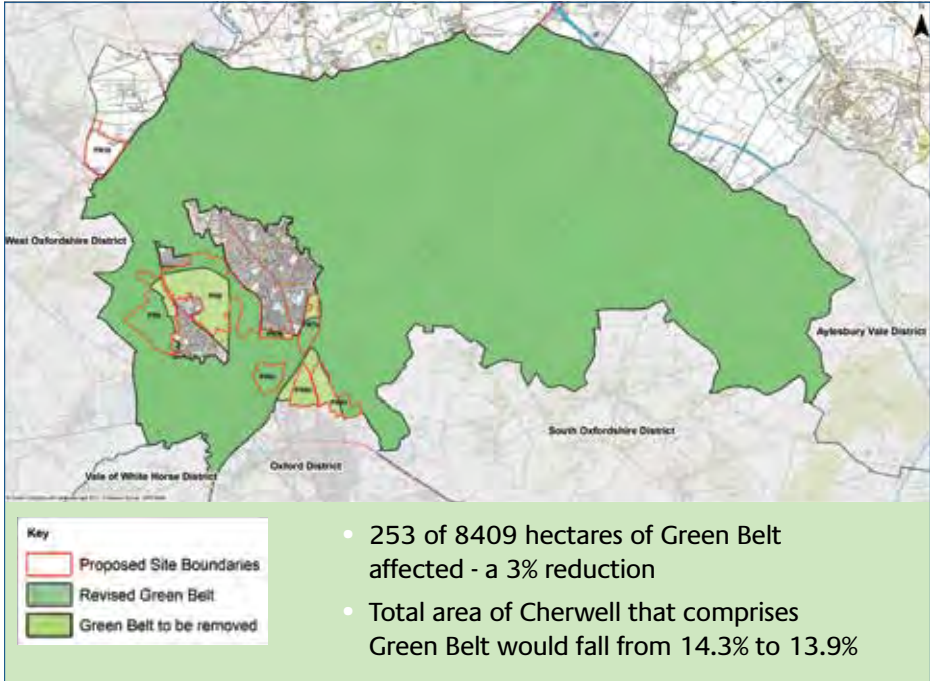
Do you agree with these reasons?

Exceptional Circumstances for Development in the Green Belt

All of the sites we have identified, other than land to the south-east of Woodstock, lie within the Oxford Green Belt. While our proposed policies seek to retain Green Belt land and protect it where possible, we consider that there are exceptional circumstances for the removal of land for development from the Green Belt. In brief these are:

- Oxford's urgent and pressing housing need
- the clear inability for Oxford to fully meet its own needs
- the absence of sustainable, deliverable and appropriate alternative sites
- the relationships between existing communities and the proposed development areas and Oxford
- the relationship of the proposed development areas to Oxford's Northern Gateway site, the University of Oxford's Begbroke Science Park, London-Oxford Airport and the Langford Lane area of Kidlington and the role of these areas in generating housing need
- the unique place shaping potential of land in the vicinity of the University of Oxford's Begbroke Science Park and Oxford canal
- the need for a cautious approach on land outside the Green Belt at Woodstock due to the presence of international and national heritage assets
- the improvement of transport infrastructure in the north Oxford / A44 / A4260 corridor areas
- the strengthening of Kidlington village centre related to sustainable transport improvements
- the opportunity for improvements to the quantity and quality of new public open space, green infrastructure, sport and recreation facilities and in terms of access to the countryside
- the ability to create a sustainable, joined-up vision for the whole of the north Oxford / Kidlington / A44 corridor area

Figure 3: Proposed Changes to the Green Belt





Have your say

Have your say

The Proposed Submission Plan and supporting documents are available at

www.cherwell.gov.uk/planningpolicyconsultation

Forms and guidance for making your comments are also available.

Comments can be made from Monday 17 July 2017 until 5pm on Tuesday 10 October 2017.

Your comments should refer specifically to the Plan. This booklet has only been produced as a guide. You may also wish to consider whether or not the Plan is 'sound' i.e. positively prepared, justified, effective and consistent with national policy.

The Plan is accompanied by a Sustainability Appraisal Report on which comments are also invited.

Copies of the consultation documents are available to view at public libraries across Cherwell, 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 Central Library (presently at 41 Castle Quarter) and at Old Marston and Summertown Libraries. In West Oxfordshire, hard copies are available at the District Council Offices at New Yatt Road, Witney, Woodstock Town Council offices, and at Woodstock Library.

Please email your comments to:

PlanningPolicyConsultation@cherwell-dc.gov.uk

Or send by post to:

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

Your name and contact address (email or postal) are required

You should receive a written acknowledgement. Email acknowledgements will be sent automatically by return.

Acknowledgements by post can be expected within five working days of your response being received.

If you do not receive a written acknowledgement, please contact the Planning Policy team on 01295 227985 to ensure that your comments have been received.

Any comments received will be made publicly available.

Staffed Exhibitions

Wednesday 19 July 2017 - 4pm to 8pm

Shipton-on-Cherwell Village Hall, Shipton-on-Cherwell, Kidlington, OX5 1JP

Friday 21 July 2017 - 4pm to 8pm

Yarnton Village Hall, The Paddocks, Yarnton, Kidlington, OX5 1TE

Thursday 27 July 2017 - 4pm to 8pm

Woodstock Community Centre, 32 New Road, Woodstock, OX20 1PB

Tuesday 1 August 2017 - 3.30pm to 7.30pm

Cuttleslowe Pavillion (next to the café), Cuttleslowe Park, Oxford

Wednesday 2 August 2017 - 4pm to 8pm

Begbroke Village Hall, 3 Begbroke Lane, Begbroke, Kidlington OX5 1RN

Thursday 17 August 2017 - 4pm to 8pm

Exeter Hall, Oxford Road, Kidlington, OX5 1AB

Next Steps

Following consultation on the Plan, it will be submitted to the Secretary of State for independent examination by a Planning Inspector. Your comments will be submitted to the Planning Inspector for consideration.

The purpose of the examination is to consider whether the Local Plan is legally compliant and 'sound' (positively prepared, justified, effective and consistent with national policy). Your comments should therefore refer to those matters.

The main stages for the Plan after this consultation are:

- Submission to Government (Regulation 22)
- Independent Examination (Regulation 24)
- Publication of the Planning Inspector's recommendations (Regulation 25)
- Adoption by the council (Regulation 26)

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.

Habitat Regulations Assessment (HRA) - HRA is required under the European Directive 92/43/ECC on the 'conservation of natural habitats and wild fauna and flora for plans' that may have an impact on European (Natura 2000) Sites. HRA is an assessment of the impacts of implementing a plan or policy on a Natura 2000 site.

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

Oxfordshire Growth Board - a joint committee of local authorities in Oxfordshire and including other non-voting members. Through the Oxfordshire Growth Board the Oxfordshire authorities are working together under the legal 'Duty to Cooperate'.

Oxfordshire Housing Market Area - the sub-regional 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.

Sustainability Appraisal - the process of assessing the economic, social and environmental effects of a proposed plan. This process implements the requirements of a European Directive. Required to be undertaken for all Local Plans.

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

Call: 01295 227985

Appendix 4

Consultation Posters

Public Consultation

17 July 2017 to 29 August 2017

Cherwell Local Plan Partial Review Oxford's Unmet Housing Need



Have
your say

Development proposals - Your comments are invited

Cherwell District Council is proposing a new development Plan to help Oxford with its high level of housing need.

All Oxfordshire councils have accepted that Oxford cannot fully meet its own housing needs.

As its contribution, Cherwell District is being asked to accommodate an additional 4,400 homes by 2031.

Cherwell District Council has previously sought views on issues and options for the new Plan. It is now inviting comments on specific proposals for housing development, including infrastructure and open space, in the south of the district.

Visit one of our public exhibitions

- **Wednesday 19 July 2017 - 4pm to 8pm**
Shipton-on-Cherwell Village Hall,
Shipton-on-Cherwell, Kidlington, OX5 1JP
- **Friday 21 July 2017 - 4pm to 8pm**
Yarnton Village Hall, The Paddocks,
Yarnton, Kidlington, OX5 1TE
- **Thursday 27 July 2017 4pm to 8pm**
Woodstock Community Centre, 32 New
Road, Woodstock, West Oxfordshire, OX20 1PB
- **Tuesday 1 August 2017 - 3.30pm to 7.30pm**
Cotteslowe Pavillion (next to the café),
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- **Wednesday 2 August 2017 - 4pm to 8pm**
Begbroke Village Hall, 3 Begbroke Lane,
Begbroke, OX5 1RN
- **Thursday 17 August 2017 - 4pm to 8pm**
Exeter Hall, Oxford Road, Kidlington OX5 1AB



View the documents from 17 July 2017

The consultation documents and details of how to provide comments will be available on-line at www.cherwell.gov.uk/planningpolicyconsultation. Or contact Cherwell District Council on 01295 227985 for details on where you will be able to view hard copies.

your place • your space • your say

Cherwell

DISTRICT COUNCIL
NORTH OXFORDSHIRE

For more information call 01295 227985

Public Consultation

17 July to 29 August 2017

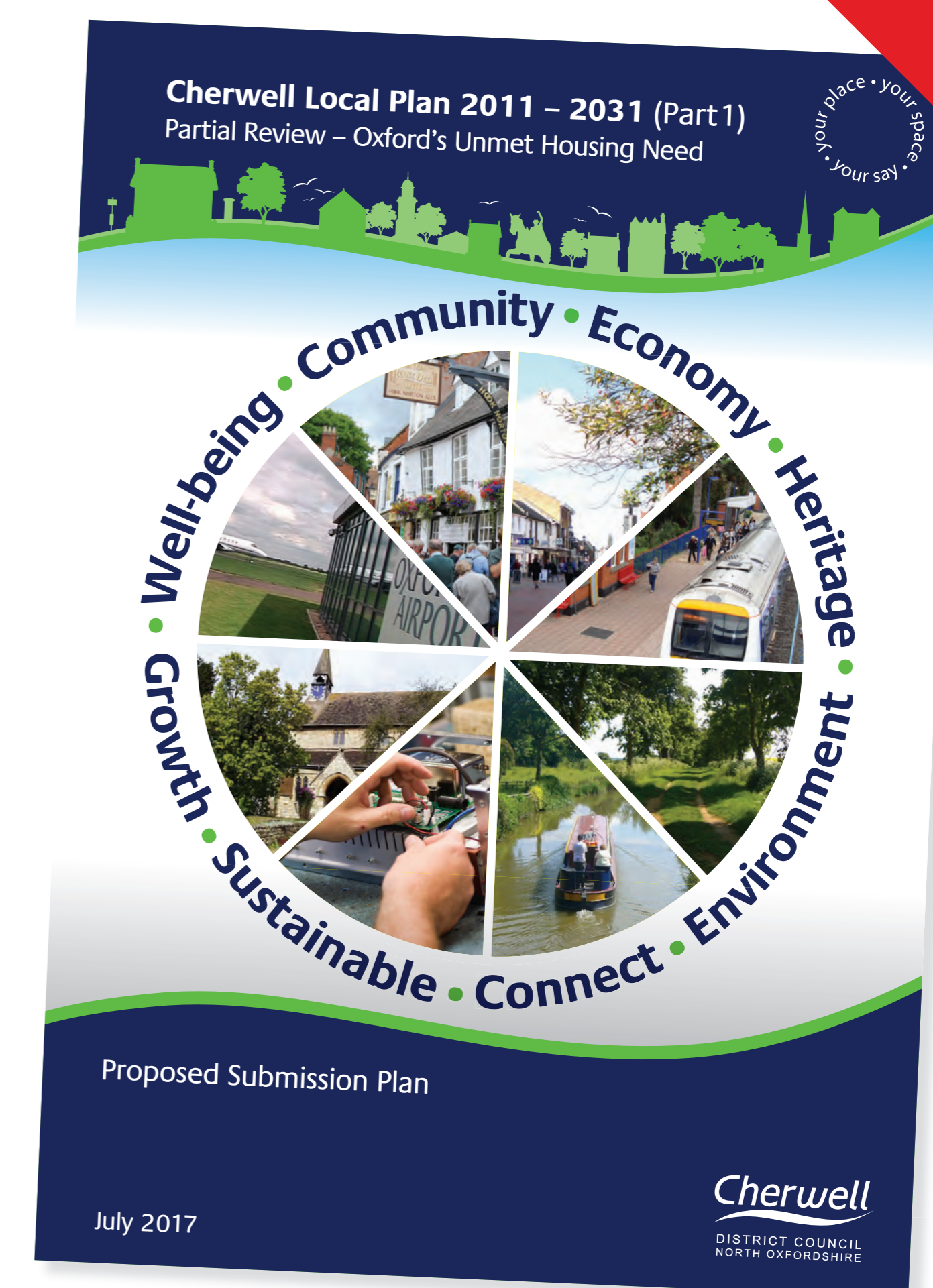
Cherwell Local Plan Partial Review
- Oxford's Unmet Housing Need

Exhibition
here today

Have your say

Consultation - your chance to comment on development proposals

Officers from Cherwell District Council are available today between 4pm-8pm so please visit our exhibition and feel free to ask questions.



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Have
your say

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Cherwell
DISTRICT COUNCIL
NORTH OXFORDSHIRE

Public Consultation

17 July to 29 August 2017

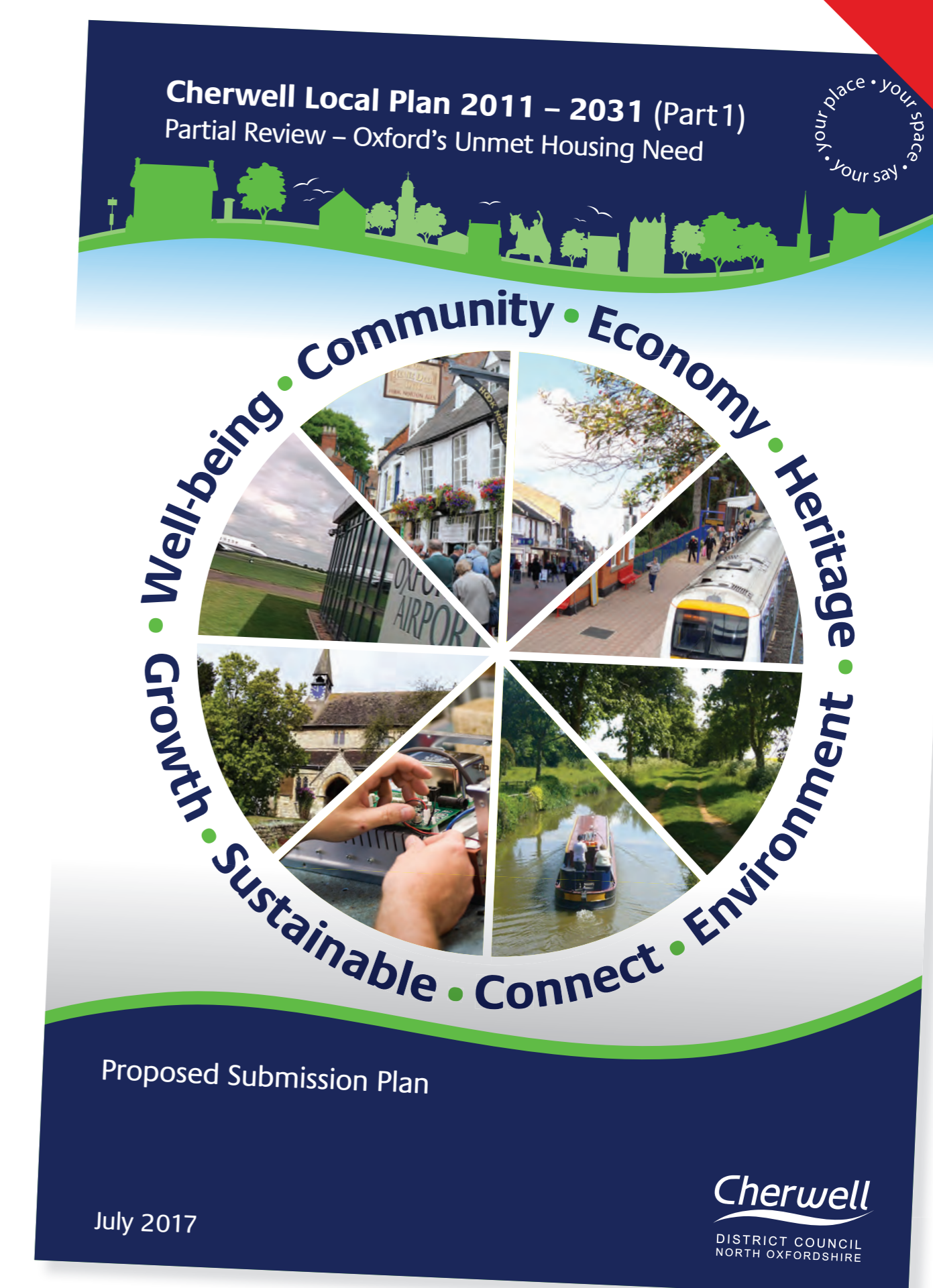
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*Have
your say*

your place • your space
• your say

Cherwell
DISTRICT COUNCIL
NORTH OXFORDSHIRE

Public Consultation

17 July 2017 to 29 August 2017

Cherwell Local Plan Partial Review Oxford's Unmet Housing Need

CORRECTION

Economy • Heritage
Well-being • Growth • Sustainable • Community

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Yarnton, Kidlington, OX5 1TE
- **Thursday 27 July 2017 4pm to 8pm**
Woodstock Community Centre, 32 New
Road, Woodstock, West Oxfordshire, OX20 1PB
- **Tuesday 1 August 2017 - 3.30pm to 7.30pm**
Cotteslowe Pavillion (next to the café),
Cotteslowe Park, Oxford
- **Wednesday 2 August 2017 - 4pm to 8pm**
Begbroke Village Hall, 3 Begbroke Lane,
Begbroke, OX5 1RN
- **Thursday 17 August 2017 - 4pm to 8pm**
Exeter Hall, Oxford Road, Kidlington OX5 1AB



View the documents from 17 July 2017

The consultation documents and details of how to provide comments will be available on-line at www.cherwell.gov.uk/planningpolicyconsultation. Or contact Cherwell District Council on 01295 227985 for details on where you will be able to view hard copies.

your place • your space • your say

For more information call 01295 227985

Cherwell
DISTRICT COUNCIL
NORTH OXFORDSHIRE

**Exhibition
here today**

Public Consultation

14 November 2016 to 9 January 2017

Cherwell Local Plan Partial Review

- Oxford's Unmet Housing Need

Have your say

Options Consultation - your chance to comment

Officers from Cherwell District Council are available today between 10am and 6pm so please feel free to come and ask questions.



The consultation documents are available online at
www.cherwell.gov.uk/planningpolicyconsultation

call: 01295 227985 email: planning.policy@cherwell-dc.gov.uk

your place • your space
• your say

Cherwell
DISTRICT COUNCIL
NORTH OXFORDSHIRE

Appendix 5
Representation Form

Cherwell Local Plan 2011-2031 (Part 1)
Partial Review – Oxford’s Unmet Housing Need
Regulation 19 Consultation - Proposed Submission Documents July 2017
Representation Form

The Proposed Submission Documents are available for inspection and comment from Monday 17 July 2017 to 5pm on Tuesday 29 August 2017.

The documents are available online at www.cherwell.gov.uk/planningpolicyconsultation and at the locations specified in the Statement of Representations Procedure.

How to use this form

Please refer to the accompanying Guidance Notes.

Please complete **Part A** in full.

Then complete **Part B for each part of the document you wish to comment on.**

As well as the proposed Local Plan (Partial Review) this form can also be used to comment on the Sustainability Appraisal and other supporting documents.

PLEASE NOTE THAT ANONYMOUS OR CONFIDENTIAL COMMENTS CANNOT BE ACCEPTED. YOUR NAME AND COMMENTS WILL BE PUBLISHED WHEN THE CONSULTATION IS COMPLETE, BUT PERSONAL INFORMATION (SUCH AS YOUR ADDRESS OR EMAIL ADDRESS) WILL REMAIN CONFIDENTIAL.

Please return completed forms:

By Email to: PlanningPolicyConsultation@cherwell-dc.gov.uk

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

If you have any questions about completing the form, please telephone 01295 227985.

Your details will be added to our mailing list which means that you will be automatically notified of the submission of the local plan for independent examination, of the publication of the recommendations of the person appointed to carry out the examination, and of the adoption of the local plan. If you subsequently wish to be removed from our mailing list please contact us.

PART A

	Details of the person / body making the comments	Details of the agent submitting the comments on behalf of another person / body (if applicable)
Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
E-mail Address		
Postal Address		
Post Code		
Telephone Number (optional)		

Please state how many Part B forms are submitted with this representation

--

PART B – Please complete a separate Part B form for each part of the document you wish to comment on

Name *(to ensure the comments are correctly recorded from each form)*

--

1. To which document does this representation relate?

Proposed Submission Plan	YES / NO (please delete)
Policies Map within the Plan	YES / NO (please delete)
Sustainability Appraisal Report	YES / NO (please delete)
Other Document <i>(please specify)</i>	

2. To which part of the document does this representation relate?

Paragraph <i>(please specify)</i>	
Policy <i>(please specify)</i>	
Table <i>(please specify)</i>	
Appendix <i>(please specify)</i>	
Other reference in document <i>(please specify)</i>	

3. Do you consider the Proposed Submission Plan to be:

Legally & Procedurally Compliant?	YES / NO (please delete)
Compliant with the Duty to Cooperate?	YES / NO (please delete)
<i>The ‘tests’ of Soundness:</i>	
Positively Prepared	YES / NO (please delete)
Justified	YES / NO (please delete)
Effective	YES / NO (please delete)
Consistent with National Policy	YES / NO (please delete)

4. Please provide the reasons if you have selected 'NO' to any part of Question 3 and consider the Plan to be uncompliant and/or unsound. Please make reference to the part of the document you have identified. Alternatively, please explain why you consider the Plan to be compliant and/or sound.

(Continue on separate sheet if necessary)

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. Please provide any suggested wording or re-wording you consider necessary.

(Continue on separate sheet if necessary)

6. If you are seeking a change to the Plan, do you wish to express an interest to participate in the Examination?

I wish to participate at the oral examination	YES / NO (please delete)
--	---------------------------------

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

(Continue on separate sheet if necessary)

Please note: *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.*

PLEASE RETURN THIS FORM BY 5PM ON TUESDAY 29 AUGUST 2017 BY EMAIL TO:

PlanningPolicyConsultation@cherwell-dc.gov.uk

ALTERNATIVELY PLEASE SEND BY POST TO:

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

Cherwell Local Plan 2011-2031 (Part 1)
Partial Review – Oxford's Unmet Housing Need
Regulation 19 Consultation - Proposed Submission Documents July 2017
Representation Form

The Proposed Submission Documents are available for inspection and comment from Monday 17 July 2017 to 5pm on Tuesday 10 October 2017.

Representations received after this date and time may not be considered.

The documents are available online at www.cherwell.gov.uk/planningpolicyconsultation and at the locations specified in the Statement of Representations Procedure.

How to use this form

Please refer to the accompanying Guidance Notes.

Please complete **Part A** in full.

Then complete **Part B for each part of the document you wish to comment on.**

As well as the proposed Local Plan (Partial Review) this form can also be used to comment on the sustainability appraisal and other supporting documents.

PLEASE NOTE THAT ANONYMOUS OR CONFIDENTIAL COMMENTS CANNOT BE ACCEPTED. YOUR NAME AND COMMENTS WILL BE PUBLISHED WHEN THE CONSULTATION IS COMPLETE, BUT PERSONAL INFORMATION (SUCH AS YOUR ADDRESS OR EMAIL ADDRESS) WILL REMAIN CONFIDENTIAL.

Please return completed forms:

By Email to: PlanningPolicyConsultation@cherwell-dc.gov.uk

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

If you have any questions about completing the form, please telephone 01295 227985.

Your details will be added to our mailing list which means that you will be automatically notified of the submission of the local plan for independent examination, of the publication of the recommendations of the person appointed to carry out the examination, and of the adoption of the local plan. If you subsequently wish to be removed from our mailing list please contact us.

PART A

	Details of the person / body making the comments	Details of the agent submitting the comments on behalf of another person / body (if applicable)
Title		
First Name		
Last Name		
Job Title (<i>where relevant</i>)		
Organisation (<i>where relevant</i>)		
E-mail Address		
Postal Address		
Post Code		
Telephone Number (<i>optional</i>)		

Please state how many Part B forms are submitted with this representation

--

PART B – Please complete a separate Part B form for each part of the document you wish to comment on

Name *(to ensure the comments are correctly recorded from each form)*

1. To which document does this representation relate?

Proposed Submission Plan	YES / NO (please delete)
Policies Map within the Plan	YES / NO (please delete)
Sustainability Appraisal Report	YES / NO (please delete)
Other Document <i>(please specify)</i>	

2. To which part of the document does this representation relate?

Paragraph <i>(please specify)</i>	
Policy <i>(please specify)</i>	
Table <i>(please specify)</i>	
Appendix <i>(please specify)</i>	
Other reference in document <i>(please specify)</i>	

3. Do you consider the Proposed Submission Plan to be:

Legally & Procedurally Compliant?	YES / NO (please delete)
Compliant with the Duty to Cooperate?	YES / NO (please delete)
<i>The ‘tests’ of Soundness:</i>	
Positively Prepared	YES / NO (please delete)
Justified	YES / NO (please delete)
Effective	YES / NO (please delete)
Consistent with National Policy	YES / NO (please delete)

4. Please provide the reasons if you have selected 'NO' to any part of Question 3 and consider the Plan to be uncompliant and/or unsound. Please make reference to the part of the document you have identified. Alternatively, please explain why you consider the Plan to be compliant and/or sound.

(Continue on separate sheet if necessary)

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. Please provide any suggested wording or re-wording you consider necessary.

(Continue on separate sheet if necessary)

6. If you are seeking a change to the Plan, do you wish to express an interest to participate in the Examination?

I wish to participate at the oral examination	YES / NO (please delete)
--	---------------------------------

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

(Continue on separate sheet if necessary)

Please note: *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.*

PLEASE RETURN THIS FORM BY 5PM ON TUESDAY 10 October 2017 BY EMAIL TO:

PlanningPolicyConsultation@cherwell-dc.gov.uk

ALTERNATIVELY PLEASE SEND BY POST TO:

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

Cherwell Local Plan 2011-2031 (Part 1)
Partial Review – Oxford’s Unmet Housing Need
Proposed Submission Plan
July 2017

Guidance Notes for making Representations

Introduction

These guidance notes have been designed to help anyone who wishes to make a formal representation on the Proposed Submission Documents for the Partial Review of the Cherwell Local Plan 2011-2031 (Part 1). Comments are invited on the documents from **Monday 17 July 2017 to 5pm on Tuesday 10 October 2017**.

Copies of the Representation Form can be downloaded at:
www.cherwell.gov.uk/planningpolicyconsultation

This is an opportunity to make comments on the Partial Review of the Local Plan before it is submitted to the Secretary of State for examination by an independent Planning Inspector. All representations received will be submitted to the Planning Inspector with the Submission Local Plan.

The purpose of the examination is to consider whether the Local Plan is **legally and procedurally compliant** (e.g. whether it has been prepared in accordance with Government regulations) and is **sound**. Any representations received on the Local Plan should therefore address these matters. They are explained in more detail within this guidance, but, as a general rule:

- 1) If you are seeking to make representations on the way in which the Council has prepared the Local Plan, it is likely that your comments or objections will relate to a matter of **legal or procedural compliance**.
- 2) If it is the actual content of the Local Plan that you wish to make comment or object, it is likely that it will relate to **soundness**.

Your comments need to be made in writing (either by email or on paper) and received by Cherwell District Council by **5pm on Tuesday 10 October 2017**.

We cannot accept anonymous responses.

Respondents should also note that representations are not confidential and that they will be published on the Council’s website and made available for public inspection. They will also be sent to the Planning Inspector who is appointed to hold the Examination of the Plan when it is formally submitted to Government. For publication purposes, personal information, e.g. addresses, telephone numbers and email addresses, will be removed. Names and company information will, however, be shown.

It is strongly recommended that you use the Representation Forms provided by the Council to make your representation to ensure that it relates to the issues of legal and procedural compliance or soundness.

How to Fill in the Representation Form

Part A: Contact Information

You must complete all your contact details. This is used to identify who has made the comment(s), so it is important that you complete this fully.

The first column relates to representations from individuals. The second column should be completed if an agent is being used. The details of the individual or body being represented by the agent should be provided.

Part B: The Representation

This is where you need to make your comments on legal and procedural compliance or soundness of the Local Plan. **It is important that you use a separate Part B sheet for each comment you want to make.** Please try to keep your comments clear and concise.

Please include your name/organisation at the top of each of the Part B forms that you use so that your comments are recorded correctly.

Question 1

Please state which Document your representation relates to. **If you wish to comment on more than one document and/or issue within a document, please complete a separate Part B sheet for each comment.**

Question 2

Please state which part of the document (Question 1) that your representation relates to. **If you wish to comment on more than one part of a document, please complete a separate Part B sheet for each comment.**

Question 3

Please select:

- whether you consider the Plan to be legally and procedurally compliant
- whether you consider the plan to be positively prepared
- whether you consider the plan to be justified
- whether you consider the plan to be effective
- whether you consider the plan to be consistent with national policy

These are matters that the Planning Inspector appointed to examine the Plan will consider in forming his/her recommendations.

Guidance on these matters is provided below.

- provide your comments and state whether they relate to legal / procedural compliance or soundness and your reasons for this.

Guidance on Legal and Procedural Compliance and Duty to Cooperate

Once it has been submitted to Government, the appointed Planning Inspector will first check that the submitted Plan meets legal requirements - principally those of the Planning and Compulsory Purchase Act 2004 (the '2004 Act') and associated regulations. He/she will then consider the tests for soundness.

You should consider the following points before making a representation on legal and procedural compliance.

- The Local Plan should be within the current **Local Development Scheme** (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council setting out the documents it proposes to produce over a set period. It sets out the key stages in the production of any documents the Council proposes to bring forward for independent examination. The LDS is available for inspection at the Council's offices at Bodicote House, Bodicote, OX15 4AA. It can also be viewed on the Council's website at: www.cherwell.gov.uk/planningpolicyconsultation

The process of community involvement for the Local Plan should be in general accordance with the Council's **Statement of Community Involvement** (SCI). The SCI is a document that sets out the Council's strategy for involving the community in the preparation and revision of documents for the Local Plan and the consideration of planning applications. The SCI is available for inspection at the Council's offices at Bodicote House, Bodicote, Banbury, OX15 4AA. It can also be viewed on the Council's website at:

www.cherwell.gov.uk/planningpolicyconsultation

- The Local Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012. On publication of the Proposed Submission Local Plan, the Council must publish the documents prescribed in the regulations, and make them available at its principal offices and on-line. The Council must notify consultation bodies (as set out in the regulations) and publish a statement making clear that the documents are available for inspection and of the places and times where and when they are available.
- The Council is required to prepare a Sustainability Appraisal when it prepares a Local Plan. This should identify the process by which the Sustainability Appraisal has been carried out, the baseline information used to inform the process and the outcomes of the process. A Sustainability Appraisal is a tool for appraising the sustainability of reasonable alternatives for the preparation of the Plan and the environmental, social and economic effects of the Plan's proposals. The Sustainability Appraisal is one of the Proposed Submission Documents made available for inspection. It is available for inspection at specific locations and on the Council's website at www.cherwell.gov.uk/planningpolicyconsultation
- The Council is required to fulfil the Duty to Cooperate in preparing the Local Plan as required by the Planning and Compulsory Purchase Act (inserted by Section 19 of the Localism Act 2011) and Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This Duty requires local planning authorities to engage constructively,

actively and on an on-going basis with other local planning authorities and other prescribed bodies when it prepares local plans.

Guidance on the 'Tests' of Soundness

Soundness is explained fully in the National Planning Policy Framework (paragraph 182). The NPPF is available from the Government's website at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

The Inspector has to be satisfied that the Local Plan is positively prepared, justified, effective, and consistent with national policy.

To be 'sound', a Local Plan should be:

Positively prepared

The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified

The plan should be the most appropriate strategy, when considered against the reasonable alternatives and be based on proportionate evidence.

Effective

The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy

The plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

Question 4

Having regard to the above guidance, please state:

- the reasons you consider the Plan to be legally and/or procedurally flawed
- the reasons you consider the plan to be unsound

Or

- the reasons you support the plan and why you consider it either to be legally and/or procedurally compliant
- the reasons you support the plan and why you consider it to be 'sound'

Please try to be specific by cross referring to procedural requirements or one of the four 'tests' of soundness.

Question 5

If you consider the Plan to be legally or procedurally flawed or unsound, please explain what changes you think are required to make the Plan sound.

If you have particular wording in mind please be specific and provide text that you suggest should be inserted into the Plan.

If you think the Plan is not sound because it does not include a policy, please consider the following before making your comment:

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so, it does not need to be included.
- Is the issue with which you are concerned already covered by any other policies in the proposed Plan or in the adopted Cherwell Local Plan 2011-2031. The adopted Local Plan is available on-line at www.cherwell.gov.uk/planningpolicyconsultation . If so there is no need for repetition
- If the policy is not covered elsewhere, in what way is the proposed Plan unsound without the policy?
- If the Local Plan is unsound without the policy, what should the policy say?

Questions 6 and 7 - The Examination

Please indicate whether you wish to participate in the independent Examination. The Examination will include a series of Hearing sessions on matters which will be identified by the Inspector. The hearings will be chaired by the Inspector and will focus on the legal compliance and soundness of the Local Plan. All representations will be considered by the Inspector.

There is a right to appear and be heard during the Examination but that right is limited to those persons defined in section 20 (6) of the 2004 Act i.e. any person(s) that has/have made representations seeking a change to the plan. However, the Inspector is not precluded from inviting anyone to appear and be heard at a hearing session(s) where he or she thinks that person is needed to enable the soundness of the plan to be determined.

The Inspector will decide who will be invited to speak at the Hearing sessions, not the Council, and the Inspector will decide the topics to be covered in each Hearing session, based on the issues raised by the written representations at this consultation stage.

General Advice

- Representations are only valid if your name and address (or email address) are supplied. If agents are completing forms on behalf of clients, agents should state the full name or organisation that they are representing.
- It would be helpful if representations are clearly presented and concise, making cross-reference to paragraphs/policies/plans/tables in the proposed Plan where relevant
- It should be noted that after this stage of consultation, further submissions will only be accepted at the request of the Inspector.

Group Representations

Where there are groups that share a common view on how they wish to see the Plan changed, it would be preferable for that group to send a single representation which represents that view,

rather than a large number of individuals sending in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised. Supporting names, addresses and signatures can be provided.

What Happens Next?

At the end of the consultation, the Council will consider the representations received and decide whether or not any changes are required to the Plan. If significant changes are not required, the Council may decide that the Plan should be submitted to the Secretary of State for Communities and Local Government for independent Examination.

A Planning Inspector will be appointed by the Secretary of State and he/she will identify the issues for debate. The Inspector will chair hearings on these issues.

An independent programme officer will be appointed and will be responsible for managing the arrangements of the Examination process, including all documents, organising the Inspector's site inspections and dealing with all correspondence. The Programme Officer reports to the Planning Inspector and will be the main point of contact during the EIP. The Council does not administer the Examination.

The right to appear and be heard during the Examination applies to those seeking a change to the plan at this 'Regulation 19' stage – the publication of the proposed Plan. It does not apply to those who have made a representation at a previous stage of Plan preparation.

Further Help

If you require further assistance please contact the Planning Policy Team on 01295 227985.

We are holding a series of exhibitions during the consultation period, details of which are available on-line at www.cherwell.gov.uk/planningpolicyconsultation

Submitting Representations

The Proposed Submission Documents available on-line at www.cherwell.gov.uk/planningpolicyconsultation or at the locations specified in the separate Statement of Representations Procedure. Any person may request a paper copy of a particular document but the Council may make a reasonable charge.

Representations should be emailed to planningpolicyconsultation@cherwell-dc.gov.uk

Or posted to:

Planning Policy Consultation

Planning Policy Team

Strategic Planning and the Economy

Cherwell District Council

Bodicote House

Bodicote

Banbury, OX15 4AA

Please note that all representations will be made publicly available. Personal details (signatures, personal addresses and personal telephone numbers) will be hidden. We cannot accept anonymous responses.

You should receive a written acknowledgement. Email acknowledgements will be sent automatically by return.

Acknowledgements by post can be expected within five working days of your response being received.

If you do not receive a written acknowledgement, please contact the Planning Policy team on 01295 227985 to ensure that your comments have been received.

Representations may be accompanied by a request to be notified when:

- The document has been submitted for independent examination
- The Planning Inspector publishes his/her recommendations
- The document is adopted

Appendix 6

Representations to the Proposed Submission