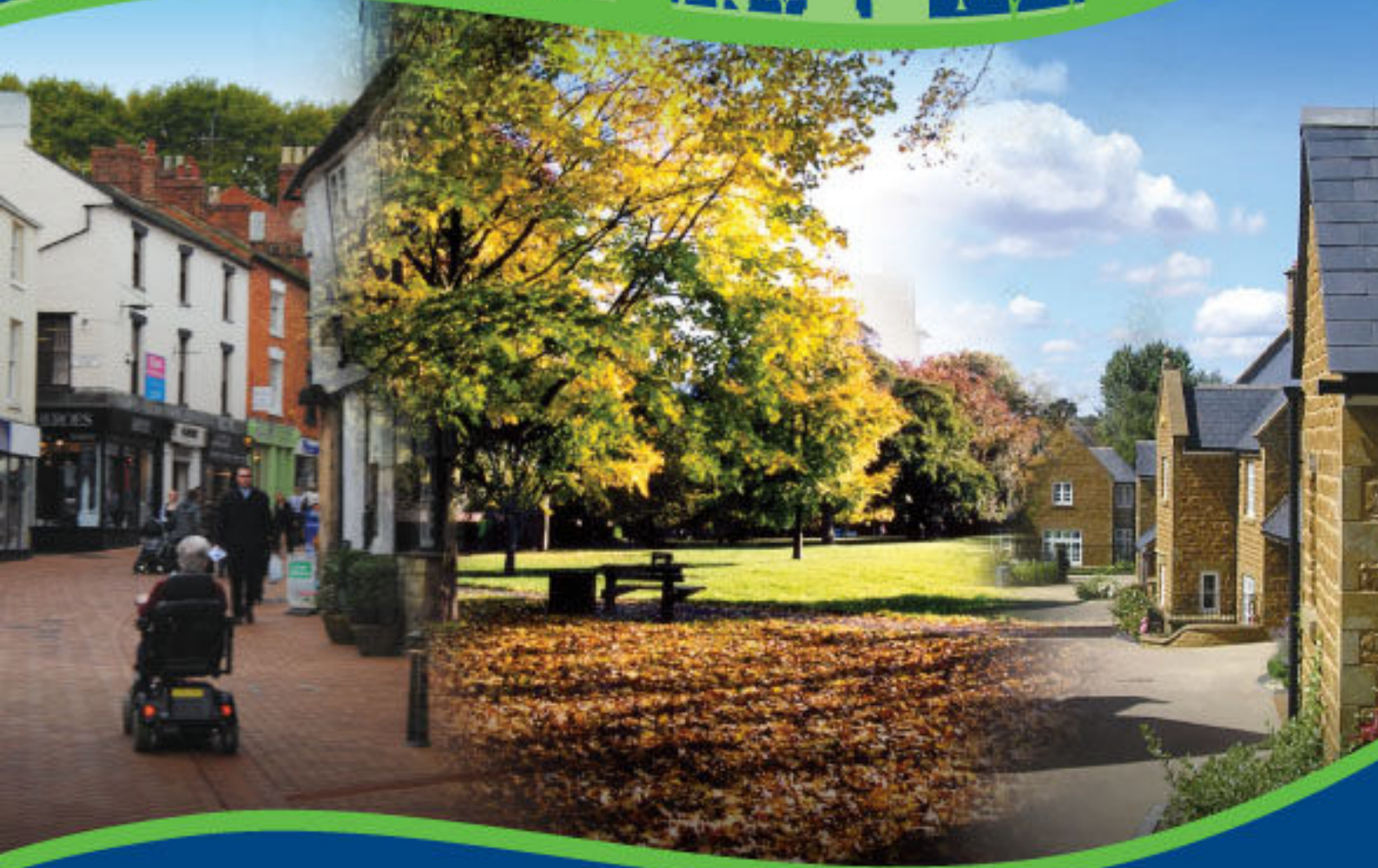


Cherwell Local Development Framework

your space
your say



Draft core strategy

Report on Consultation

Draft Report
(Page numbers to be finalised)

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1 Draft Core Strategy

In early 2010 Cherwell District Council consulted on their draft core strategy as part of the preparation of the Cherwell Local Development Framework.

The Core Strategy, upon adoption, will guide development and growth across the District until 2026.

As part of its preparation, the draft core strategy set out and sought opinion on:

- How the district will grow
- Where this growth will be, including strategic sites for new housing and employment
- How the growth will be delivered

1.1 How did we consult?

The consultation ran for 8 weeks from 22nd February to 19th April 2010.

A number of documents were prepared as part of the consultation:

- Draft Core Strategy
- Draft Sustainability Appraisal
- Executive Summary
- Leaflet
- Questionnaire

1.1.1 Distribution

All of the consultation documents were available to view and comment online for the duration of the consultation, at

www.cherwell.gov.uk/localdevelopmentframework

They were also available to view at the following locations:

- Cherwell District Council Office, Bodicote House
- The Bicester, Banbury and Kidlington Link Points
- All District libraries including mobile libraries

Leaflets and questionnaires were available at these locations for people to take away.

Hard copies of the draft core strategy, draft sustainability appraisal, a number of leaflets and questionnaires were sent to all Town and Parish Councils within the District.

Parishes Councils were also sent further copies of the leaflets and/or questionnaires upon request. For example Bodicote Parish Council requested 1000 leaflets and 1200 questionnaires. These were then distributed by the Parish with their village newsletter.

All District Councillors received a hard copy of the documents.

Cherwell Local Strategic Partnership Project Board and the Management Group members all received a hard copy of the documents.

Hard copies were also sent to a number of organisations, including Environment Agency, Highways Agency, and Natural England (See Appendix 2.1 for full list).

1.1.2 Press Coverage

A press briefing was given on the 25th January 2010 by the Council following approval of the draft core strategy by Executive. This provided the press with the opportunity to discuss the draft core strategy and forthcoming consultation with planning policy officers. They also received various documentation including images of the maps.

Notices of the consultation were placed in the Banbury Guardian, Banbury Cake, Bicester Advertiser and the Oxford Times for two consecutive weeks, week commencing 15th and 22nd February 2010.

A full page advert highlighting the consultation was published in the Banbury Cake and the Bicester Advertiser during the consultation period.

The Council published a page highlighting the consultation in the Cherwell Link. This is the free Council publication which is delivered to every household in the District.

Various articles were published in the local press and on the local radio discussing the draft core strategy during the consultation period.

Hard copies of the press articles are available to view on request.

1.1.3 Exhibitions

Five exhibitions were held across the District during the consultation. This involved display boards and pull up display boards showing summaries of the information contained within the core strategy. They provided the opportunity for people to come and ask officers questions about the consultation and to takeaway leaflets and questionnaires.

Date	Venue
5 th March 2010	Crown Walk, Bicester
6 th March 2010	Crown Walk, Bicester
13 th March 2010	Castle Quay, Banbury
25 th March 2010	Bodicote House, Bodicote
30 th March 2010	Sunshine Centre, Bretch Hill, Banbury

1.1.4 Workshops

Two workshops were held for Town and Parish Councils during the consultation period:

- 8th March 2010 at Weston on the Green Village Hall
- 17th March 2010 at Bodicote House, Bodicote

Prior to the workshops we asked the Parish Councils if they would like to discuss the following policy areas during the sessions:

- Strategic Sites
- Village Allocations
- Other Policy areas

The majority of attendees requested a village allocations focus, so it was decided, with the Parish Councils' agreement, to run the workshops in an open discussion format. An officer gave a presentation on the draft core strategy and there were then questions and answers as a whole group.

These sessions were not minuted as they were to provide an opportunity for Parish Councils to find out more about the consultation which would then inform their representations to the draft core strategy.

1.1.5 Meetings

A number of other meetings were also held across the district during the consultation. Some organised by the Planning Policy team and some by other departments of the Council as part of their work. All provided an opportunity to raise awareness on the draft core strategy consultation and for the community to ask questions.

Date	Group	Officers
22 nd February 2010	Rural Affordable Housing Workshop, Islip	Officers presented the consultation as part of the full day event and answered questions
23 rd February 2010	Mollington Conservation Area	Officers attended the meeting and answered questions
25 th February 2010	Cherwell Local Strategic Partnership Event	Officers presented as part of the event and answered questions
2 nd March 2010	Wardington Conservation Area	Officers attended the meeting and answered questions
3 rd March 2010	Banbury Youth Forum	A briefing note and consultation material were provided to CDC officers who distributed and discussed at this group meeting
12 th March 2010	Banbury Rotary Club	Officer presentation and Q& A session
15 th March 2010	Kirtlington Conservation Area	Officers attended the meeting and answered questions
18 th March 2010	Kidlington Parish Council	Officer presentation and Q& A session
22 nd March 2010	Bicester Youth Forum	A briefing note and consultation material was provided to CDC officers who

		distributed and discussed at this group meeting
23 rd March 2010	Bicester Vision AGM	Officers presented the consultation as part of the AGM and answered questions
23 rd March 2010	Bicester Town Council	Officer presentation and Q& A session
24 th March 2010	Cherwell Equality and Diversity Panel	Officer presentation and Q& A session
25 th March 2010	Wroxton and Balscote Parish Council	Officer and Parish Councillor discussion
25 th March 2010	Kidlington Parish Council	Officer presentation and Q& A session
26 th March 2010	Banbury School	Officer presentation about Eco Town and Q & A session and then practical exercise on an eco home.
30 th March 2010	Registered Social Landlords Development Group	Officer attended and talked through the document followed by a discussion.
30 th March 2010	Hanwell and Drayton Parish Council	Officer presentation and Q& A session
31 st March 2010	Banbury Town Council	Officer presentation and Q& A session
1 st April 2010	CHIP meeting	Officer presentation and Q& A session

1.2 Responses

All responses made during the consultation period are available to view online at <http://consult.cherwell.gov.uk/portal/ldf/cs/>

Where respondents have not specified question numbers, responses have been considered under the most appropriate question number following officer consideration. This may mean that the same comments are placed under a number of questions.

1.2.1 Breakdown of responses

We received a total of 592 responses to the draft core strategy consultation.

Web	75
Emails	83
Questionnaires	321
Letters	113

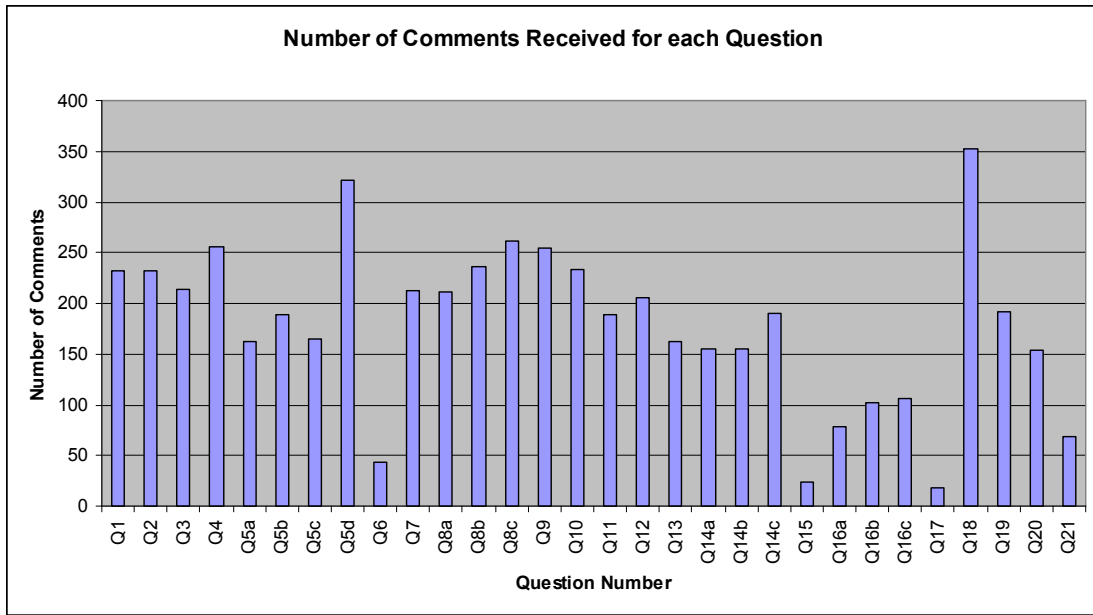
Some of the letters and emails do not state to which question/s the respondent's comment relates to and therefore the officers take a decision as to which question/s the comment is most applicable to. Where necessary this may mean that the same comments are placed under a number of questions.

Not all responses received contained a comment to every question and therefore the majority of questions in the report do not have a total of five hundred and ninety two in there total

In total 4342 comments were made.

We have received a number of representations without contact details on them. **SAY HOW MANY** where this is the case they have not been considered a formal representation and they have not been included within the responses made available online or within the figures above. However officers have been made aware of these responses and where received they have been separately noted in the question summary.

1.2.2 Summary of response rates to questions



This table shows that the questions that received the most comments were Question 18 and 5

Question 18 asked “Do you support the site allocated for the relocation of Banbury United Football club”

Question 5 asked “Do you support the allocations proposed for strategic housing allocations” and specifically Banbury – Land at Bankside (Phase 2).

These two questions will be discussed in more detail later in this report.

1.3 Summary of responses

Below are the summaries of the main points made to each question. They are to act as a guide only and full responses to all the questions can be viewed at <http://consult.cherwell.gov.uk/portal/ldf/cs>.

All officers use the full responses as they prepare the next stage of the Core Strategy.

The summaries below often contain many more comments that object to an area of the Core Strategy, than comments in support, even though the question will have higher overall support than objections. . We can summarise that this is because when people object to a question they usually add why they object and/or propose an alternative option.

1.4 Question 1: Do you support the vision for Cherwell District?

	Yes	No	Total
No of Responses	163	69	232

1.4.1 Summary of Responses

70% of all respondents support the vision for Cherwell District. Many of the comments were made in relation to the following issues:

- Transport
- Infrastructure
- Level of growth
- Employment
- Rural Settlements

2.1.1.1 Reasons for supporting the vision:

- Supports a sustainable rural economy that is not entirely reliant on agriculture
- Includes a desire to maintain and improve the vitality and viability of urban centres
- Retains the local distinctiveness of Banbury as a historic market town
- Well thought out

2.1.1.2 Reasons for not supporting the vision:

- Does not include improvements to IT infrastructure for rural communities
- Overall proposals are unfeasible without a complete rethink of a new ring road for Banbury
- It should place greater emphasis on importance of rural settlements and communities
- No appropriate plan for traffic
- No flood alleviation scheme for Central Bicester
- Objections to the level of housing provision for the district

- Failure to plan for the cost and implementation of necessary infrastructure prior to developments coming forward

2.1.1.3 Other specific comments

One respondent suggested the Vision does not take sufficient account of existing communities; with policy being governed by centralised government ideology disconnected from the people it serves.

One comments said the Vision should make specific reference to supporting the development of employment sites for B1, B2 and B8 development in order to ensure that economic development matches the rate of growth in the residential sector, as this will provide a more sustainable pattern of development.

One respondent commented that it is difficult to fault the Vision as such, because it is fully scoped. However, it lacks detail, especially with regard to the role that Cherwell's unique and valuable assets might play, how progress is going to be made, and how Cherwell Council will know that its efforts are progressing towards the Vision, step by step. There is, in particular, a lack of detail on the necessary requirements for a robust policy framework on the knowledge economy. And the Vision needs to be founded on an up to date economic evidence base.

One respondent argues that the vision is not substantiated as it states “Cherwell will maintain its rural character”, but this does not appear to apply to Bodicote due to the large amount of housing being built of green fields and being called an urban extension to Banbury.

One comment related specifically to growth in villages; offering support for the proposal to direct growth at most sustainable villages.

One respondent suggests that without a complete rethink on a new ring road around Banbury, the proposals are not feasible.

Hanwell PC support the Vision in general terms. Further comments say they would like to see some reference to the importance of the underlying "sustainability" of the Vision and some recognition that Cherwell - like many other parts of the South East - has environmental limits to continued growth and development.

One respondent focused specially on the area around Hook Norton and The Sibfords. The comments suggest the statement of vision fails to recognise the distinctive needs of the Hook Norton - Sibfords area as contrasted with the M40 corridor. These comments are based on concerns relating to sustainability, the inability to reduce car use, the sensitivity of the surrounding landscape and the distinctiveness of the rural economy in the area. It is suggested that the distinctive contribution of this area should be explicitly recognised, not covered by policies appropriate to other Cherwell areas.

One respondent suggested the Vision should include the ‘non-coalescence’ of villages to help retain their identities and to achieve the point in section A.18 which states "the need to protect and enhance the identity of Cherwell's towns and villages".

Network Rail commented that there is little reference to transportation issues and the future aims/vision of which the Council may have to improve the transport infrastructure and opportunities for transportation.

One respondent suggests the vision should place greater emphasis on the importance of the rural settlements within Cherwell and the need to provide additional housing to ensure the retention of rural services and facilities.

One respondent comments that the 'vision' for Cherwell District appears myopic. On a superficial level its aims are an attempt to be seen to be dancing to central government's tune, as dictated by a quango based in Guildford. On a practical level, there is a total failure to plan for, cost, and implement the essential infrastructure measures necessary, prior to successfully undertaking the bulk of its proposals.

Banbury Town Council supports the vision and feels it is important to retain the local distinctiveness of Banbury as an historic market town.

Officers Response

Many comments made in not supporting the vision are in relation to the lack of inclusion of “specific” issues such as Banbury Ring Road, IT, types of development and flood alleviation in Central Bicester.

(These sections to be added)

1.5 Question 2: Do you support the spatial strategy for Cherwell District?

	Yes	No	Total
No of Responses	142	90	232

1.5.1 Summary of Responses

61% of respondents support the Spatial Strategy for Cherwell District.

2.2.1.1 Reasons for supporting the spatial strategy:

- The growth is directed at the major towns which protects rural areas
- The objectives promote sustainable development
- Support for the suggestion that Banbury should grow at a slower pace than Bicester
- It aims to protect the Green Belt from development

2.2.1.2 Reasons for not supporting the spatial strategy:

- Certain aspects of the strategy are not compatible with the vision
- Too much focus of development on Bicester
- Too many large, dense housing sites
- Does not maintain the rural character of Cherwell
- The Spatial Strategy is not holistic or realistic and does not deliver in the proposed developments
- The district can not sustain growth on the scale proposed without a decrease in quality of life for existing residents
- The distribution of housing in rural areas is inappropriate

2.2.1.3 Other Comments

With regards to the issue of growth, one respondent argues that whilst the strategy states that growth (outside the main urban areas) will be directed towards the larger and more sustainable villages, it would actually be better to spread some of this development to the less sustainable villages to make them more sustainable.

One respondent suggested that the aims of the 'spatial' strategy are contradictory and illogical. The aim to 'Strictly control development in open countryside' is at total odds with existing and future planning proposals. At the same time severely restricting the potential of the redevelopment of the Upper Heyford base; a site where most of the government targets for housing numbers could be met without further intrusion and blight on the life of the majority of villages of Oxfordshire.

One respondent comments that the amount of housing planned for Bicester is too high.

One developer supports the aspect of the spatial strategy which seeks to direct most of the growth in the district to locations within or immediately adjoining the main towns of Banbury and Bicester. However whilst Bicester is

recognised in the spatial strategy as the main location for development within the Central Oxfordshire sub-region (in line with the South East Plan), it is important that sufficient growth is directed to Banbury in order to support its role as the 'Primary Regional Centre'.

One respondent comments that while they agree that development in the Green Belt and AONB must be controlled more strictly than elsewhere, it is important to remember that farmers and growers manage this landscape on a day-to-day basis as part of their agricultural operations. If they are to remain on the land to perform this service, their businesses must be profitable and competitive. This means that they must be able to keep up with modern production methods, hygiene standards and environmental regulation requirements, with associated planning applications. For these reasons, a degree of reasonable agricultural development should be permitted even in these designated areas.

One respondent supports the need for the plan, but questions the need for this amount of new housing in the country.

Officers Response

1.6 Question 3: Do you support the fourteen strategic objectives?

	Yes	No	Total
No of Responses	147	67	214

1.6.1 Summary of Responses

68% of respondents support the fourteen strategic objectives.

2.3.1.1 Reasons for supporting the strategic objectives

- Supports diversification in the rural economy and provision of affordable housing to cater for employees of rural businesses
- Promotes vitality, viability and distinctiveness of urban centres

2.3.1.2 Reasons for not supporting the strategic objective

- Lack of proposed infrastructure to accompany and support housing development
- Where is the economic growth going to come from?
- The objectives are not locally distinctive
- Not practical
- Trying to cut car use, but CDC has no control over this
- Not enough regeneration of existing areas
- Remain unconvinced by the evidence to support additional housing

2.3.1.3 Other Comments

One respondent suggested that many of the objectives rely on commitment from outside bodies to achieve them and questions if this is a realistic approach.

Another respondent suggests that including "employment opportunities and services" after "housing" in objective SO.8 would better indicate the Council's intention to develop sustainable rural communities. The provision of housing alone will not achieve this aim.

One developer suggests that the strategic objectives fail to provide the link between the high level vision and the detailed strategy, as required by paragraph 4.3 of PPS12. Instead, the strategic objectives, whether they be in respect of economic, community or environmental issues, are of a generic nature which could be applied to any district within the country. Consequently, they cannot be said to "expand the Vision" into key specific issues for the area.

The Government Office for the South East commented on the need to look again at the strategic objectives in the light of paragraphs 4.1 to 4.5 of PPS12 to focus them on the key spatial issues to be addressed, such as (for example) delivery of an eco-town, regeneration of a run-down area, boosting town centre performance etc. The objectives, as currently written, could apply to most areas of the country and do not seem to grasp the key local delivery

issues the plan is seeking to address. They may be better placed within the sustainability appraisal as sustainability objectives rather than strategic plan objectives. In order to show clear arrangements for managing and monitoring delivery of the strategy, the monitoring indicators and critical success factors should be linked to strategic objectives so that the Council can identify whether or not it is meeting the strategic objectives through implementing the strategy and report its findings and proposed actions in the AMR.

The Highways Authority is supportive of the 14 strategic objectives, particularly objective SO 12 which aims to reduce the dependency on the private car as a mode of travel.

NEED TO ADD IN ENGLISH HERITAGES COMMENTS ON SO

Officers Response

1.7 Question 4: Do you support the proposed overall distribution of development across the District (development strategy)?

No of Responses	Yes	No	Total
	129	127	256

1.7.1 Summary of Responses

In relation to the distribution of development across the District, the respondents were split with 50% supporting the overall distribution of development.

2.4.1.1 Reasons for supporting the distribution of development:

- Overall support for the emphasis of growth
- Approve of North West Bicester allocation reducing the housing target in rural areas
- Support for the distribution of new housing development to the rural areas of the district in order that the vitality of such settlements can be maintained. However, it is important that development is focused in the most sustainable locations which comprise the Category A settlements
- There is a need for further homes in Banbury, especially affordable housing for local people

2.4.1.2 Reasons for not supporting the distribution of development:

- Concerns over proposed eco-town and forcing Bicester to have more houses than is required
- Virtually all North Cherwell houses could be built at Upper Heyford
- Too much housing in Bicester
- Bodicote is losing its physical identity and becoming a suburb of Banbury
- Councils should renovate all unoccupied houses/flats before building more homes, and stop people buying second homes
- 600 units allocated to Bicester should be returned to the villages
- 90% of housing distribution should be in the two major towns. The villages should be left as they are with only infill taking place and not major development
- Canalside development is in the floodplain
- Infrastructure has not been thought through fully
- There will not be enough jobs and facilities for the number of houses proposed
- Smaller villages should not be excluded from development

2.4.1.3 Other Comments

One respondent suggests that the overall pattern of distribution seems sensible given the demands of Cherwell, but they question whether Cherwell needs to continue to accommodate this overall level of growth for the next 20 years.

Another respondent would support any development providing good thought is given to flooding and transport.

Whilst Bicester is recognised in the spatial strategy as the main location for development within the Central Oxfordshire sub-region (in line with the South East Plan), it is important that sufficient growth is directed to Banbury in order to support its role as the 'Primary Regional Centre'. Bicester is neither a Primary Regional Centre nor Secondary Regional Centre in the South East Plan and its growth should be considered in this light. The Core Strategy should ensure that sufficient growth is directed to Banbury (and its catchment) to sustain its role as a 'Primary Regional Centre' and support appropriate growth and development.

The Homes and Communities Agency commented that as the Core Strategy develops further, they would expect to see a programme/ timeline for the delivery of each Strategic Site identified within the Core Strategy. A contingency plan should also be identified which would be triggered if there are slippages in the programme beyond the plan period.

Kidlington Parish Council does not support the proposed distribution of development. They suggest the distribution does not reflect identified local need, and has been arrived at using completely unsound methods. It delivers only the housing targets set out within the SE Plan (H1) as minimum targets, and makes no contribution towards the regeneration agenda that should be in place to meet the special needs of Kidlington. They do not accept the argument that housing in eco-town will be more sustainable than other developments, as the Code for Sustainable Housing standards will apply to all housing developments.

Officers Response

1.8 Question 5: Do you support the allocations proposed for strategic housing allocations?

Site Locations	Yes	No	Total
North West Bicester (Eco Development)	118	44	162
Banbury Canalside	133	56	189
Banbury Land West of Bretch Hill	117	48	165
Banbury Land at Bankside (phase 2)	97	225	322

1.8.1 Summary of responses to North West Bicester (Eco Development)

62% of respondents support the strategic housing allocation at North West Bicester.

2.5.1.1 Reasons for supporting North West Bicester (Eco Development):

- The proposal for NW Bicester is a sensible response to the eco-town issue and to the long term regeneration and growth of Bicester
- Bicester, unlike Banbury, has fewer physical constraints to its further expansion

2.5.1.2 Reasons for not supporting North West Bicester (Eco Development):

- N W Bicester is not viable because there is insufficient consideration to the reality of sustainability
- Traffic generation will cause gridlock on already overcrowded roads
- The scale of development will result in the loss of green space
- Allocation is a response to the threat of Weston Otmoor and not a sound planning decision
- Brownfield sites in the area should be given first priority
- Too many farms are being destroyed and laid to tarmac
- Insufficient infrastructure to cope with growth
- NW Bicester does not contain innovative and exemplary proposals that can deliver a step-change in peoples' transport habits or a step-change in the fortunes of the town

2.5.1.3 Other Comments

One respondent has significant concerns that the development will add to the problem of Ambrosden being used as an alternative route to Oxford.

One respondent argues that the North West Bicester site probably has the least impact on the surrounding villages than development elsewhere in Bicester.

Another respondent is concerned that the NW Bicester Eco-town is undeliverable - not least in terms of jobs, an essential component of the sustainability mix.

One respondent questioned the ability to deliver one new job for each new household as the pace of development seems to be faster than the growth of employment related to the development.

Several respondents suggest that NW Bicester will give rise to additional need for investment in highways and other infrastructure provision within the town centre.

One respondent suggests that the LDF must make it clear that developers must take a holistic approach by showing how the new extensions to Bicester will be integrated with the present town to create cohesive, robust, sustainable and interdependent communities.

One local landowner argues that they own 250 acres of the 845 acre site for NW Bicester and have been trying to remove their land from the allocation for over 18 months.

One developer raised concerns about the timing of delivery. They question the eco-towns central position within the Core Strategy given its inability to deliver significant housing numbers in the early part of the Plan period.

SEEDA considers that the proposed eco-extension of North West Bicester represents a significant opportunity for the Council to become an exemplar Local Authority in the delivery of sustainable economic development and has the potential to be a real opportunity for the borough more widely through tourism stemming from the eco-town.

SEEDA also considers that the cross cutting policies of the Core Strategy do not make adequate cross-reference to the eco-extension. In particular, the Policies for Developing a Sustainable Local Economy need to make much more of the eco-town concept.

One respondent argues there is no economic viability assessment or residual land value calculation that can be relied upon and therefore no evidence to suggest that the NW Bicester scheme is viable.

Another respondent comments that the Core Strategy should address the relationship between the NW Bicester Eco Town designation and the flow of benefits and opportunities to the existing town which can be maximised by taking a joint strategic 'whole of Bicester' approach.

One developer suggests that Policy NWB1 fails to identify the level and form of retail provision within the eco-development. This introduces a level of uncertainty which may impact on delivery of homes and jobs given that retail provision as part of community and other appropriate facilities is likely to be essential to achieve a sustainable development.

Officers Response

1.8.2 Summary of responses to Banbury - Canalside

70% of respondents support the strategic housing allocation at Banbury: Canalside.

2.5.2.1 Reasons for supporting Banbury - Canalside:

- The site is highly sustainable and in need of regeneration
- It is close to the railway station allowing travel by train
- Allows for walking and cycling and less reliance on the private car
- Canalside will contribute to the vision for Banbury town centre
- New housing will create demand for shops, helping the town centre
- The site already has amenities and infrastructure near by
- Developing Canalside will prevent loss of valuable landscape and greenfield sites
- Developing brownfield sites is more environmentally friendly
- The site reflects the findings of the BANITLUS
- It will allow for the creation of a linear park through the town
- Areas on the site are under occupied and in disrepair
- Urban location allows for a high density of residential development
- There is an opportunity to redevelop the canal

2.5.2.2 Reasons for not supporting Banbury - Canalside:

- There should be no extension of Banbury Town Centre to the east as this will undermine the viability of the existing town centre
- The amount of commercial development within Canalside is too high
- There will be a loss of ecology
- Contamination will need to be remediated
- The site is in the floodplain and should not be developed
- The Sequential and Exceptions tests have not been completed
- No flood alleviation scheme is 100% safe
- It is unclear whether flood risk has been taken into account
- Flooding may reduce the capacity of the site
- Too many new homes are proposed
- Due to constraints the number of dwellings should be reduced
- There will be noise concerns from trains
- A Master Plan should guide incremental development and funding arrangements
- There will not be enough money for improving the canal/towpath
- Not enough parking is being proposed at Canalside
- Shared use of the parking by residents and rail users is unworkable
- There should be a substantial linear park between the Canal and river
- The two access points from tramway and station approach will not be sufficient
- Development would lead to traffic in Grimsbury and on the inner relief road
- Development as proposed would negatively affect railway operations.
- Windsor Street should be calmed

- The Banitlus study highlighted how sustainable Canalside was but also how every arterial road in Banbury was at capacity and therefore a south east relief road is necessary
- The site is not deliverable
- The scheme is too ambitious
- The proposals are unviable
- A comprehensive redevelopment is not possible
- It cannot be delivered within the timescales set out in the Core Strategy
- There may be difficulties/delays in relocating the football club
- Setting out undeliverable proposals on this site will cause blight
- A requirement for 30% affordable housing will affect viability
- CDC should put in place a robust S.106 regime
- The capacity of the site should be guided by the consultation responses received by landowners
- Difficult plots (say due to contamination) will require gap funding.
- Securing a bridge over the railway will be difficult and would require agreement with Network Rail
- The densities proposed mean the provision of significant amounts of flatted accommodation. The demand for such units is virtually non-existent from both the private and social housing sectors
- Any scheme will need to include a budget for relocation costs and compensation and this appears not to have been addressed
- The policy must be redrafted to set out a framework that allows individual landowners to make separate planning applications on a site-by-site basis so long as they are in broad compliance with the SPD
- Delays in the redevelopment of the Cattle Market demonstrate how difficult it is to redevelop land in several ownerships
- Under the current proposals the Council will have to use CPO
- Development would lead to the loss of businesses and employment land
- Older industries may not be able to relocate to other locations
- Some areas on the site continue to attract employment investment.
- There should be early provision of employment land and premises at Banbury to cater for the loss of employment land at Canalside
- Policy should seek to support retention of existing businesses where they remain commercially viable both financially and operational
- Businesses at Canalside offer lower skilled or manual employment
- None of the issues raised in objections to the SPD have been addressed in the Core Strategy
- Refusal of planning permission for other uses that do not comply with the Core Strategy will stifle investment
- Any evidence base which considers the viability and deliverability of the site should be made publicly available
- The Council has not met legal/policy requirements, including those set out in PPS12, the requirements of the Planning and Compulsory Purchase Act 2004 and 'Sustainability Appraisal'
- There has been a lack of consultation with Stakeholders/landowners

- Development should be phased so car parking can be maintained all the way through any re-development proposals
- BANITLUS should assess a reduced number of dwellings at Canalside
- There is insufficient evidence to support the scheme

2.5.2.3 Other Comments

Banbury United state that the proposals offer an excellent opportunity to realise its aims, and it will be able to meet the needs of all of its members and deliver aims of offering leisure/sporting benefits to the community in general.

CEMEX would like land on the eastern side of the railway line allocated for mixed use development, which they believe could form part of a wider regeneration area with Canalside.

Given the proposed development of the Banbury United Football Club site within the Canalside allocation Sport England highlight their statutory consultee status regarding planning applications affecting playing field land.

The Environment Agency state that a sequential and exception tests are being undertaken for Banbury Canalside and that they acknowledge that the Council will be completing these before pre-submission. They express concern that consultation on a Spatial Strategy has been completed before the Sequential test and Exception test is complete. They also advise that there should be a clear audit trail of evidence showing how key decisions have been taken. A Level 2 SFRA should be completed. Development should also be phased to allow effective clean up of contamination sources and pathways. Development should enhance the riverside environment and provide open space mainly focused in the areas of highest flood risk. Some clarification may be helpful about the carbon rating being required in this policy. It is not clear why Canalside has been allocated in preference to other sites.

Stage Coach support redevelopment of Banbury Canalside in the longer term. However they state that as occupiers of the site, who provide an invaluable service to the District, the impact of proposals on their operation should not be overlooked. They need to be relocated to a site within the urban area of Banbury which is not in close proximity to residents.

Officers Response

1.8.3 Summary of responses to Banbury - Land west of Bretch Hill

71% of respondents support the strategic housing allocation on land west of Bretch Hill Banbury.

2.5.3.1 Reasons for supporting Banbury – Land west of Bretch Hill:

- General recognition of the need for further homes and especially affordable homes for local people
- The existing farm track provides a natural physical boundary (Banbury Town Council)
- Development could revitalise the estate, provide additional open space and improve the urban fringe (Banbury Town Council)
- Traffic could be dissipated by using Stratford Road, Warwick Road, Dukes Meadow Road or roads through the estate. (Banbury Town Council)
- Development could help improve the physical and social infrastructure of the adjacent area

2.5.3.2 Reasons for not supporting Banbury – Land west of Bretch Hill:

- Development should be located in built up areas which have better transport links and local amenities
- Considerable distance to employment sites and the town centre
- Impact on local services, amenities and employment which are limited
- Several well used public rights of way which cross the site would be adversely affected, including the Banbury Fringe Circular Walk
- The site is unsuitable for development due to its landscape sensitivity (as indicated in the District Council's Landscape Sensitivity and Capacity Assessment), being open, elevated and prominent in views from the west, and due to its proximity to Grade II* Wroxton Abbey Park, Drayton Conservation Area and listed Withycombe Farm
- Development and lighting would be visible on the skyline, having an urbanising affect in unspoilt areas and could not be screened with planting due to the potential adverse impact on the open landscape character and on Wroxton Abbey parkland
- In view of the landscape constraints there would need to be strong and compelling reasons for the site to be developed and these are not clearly identified
- Displacement and disruption to local wildlife including badgers
- Loss of high quality farmland
- Loss of Drayton's village identity (Drayton Parish Council and others).
- Increase in traffic around the existing schools threatening the safety of children
- Lack of capacity in existing schools (includes Drayton Parish Council).
- Adding 400 houses to the area will only compound problems of deprivation, not address them
- Development of this size could not make a meaningful contribution to the urban fabric and social community of the adjacent area due to regulations on developer contributions, and opportunities to secure

funding would be reduced by the need to negotiate with third parties to secure access rights

- Increased volume of traffic on A422, Ruscote Avenue, Warwick Road and within Bretch Hill with limited scope to address these issues as recognised in BANITLUS (includes Drayton Parish Council)

2.5.3.3 Other Comments

One respondent living adjacent to the site asks what compensation will be given to those whose houses will be devalued by the proposed development.

One respondent questioned the need for affordable housing in this area and queries what research has been done on other ways to address the issue.

One respondent queries the impact on local infrastructure including traffic, noise, pollution, water, electricity, gas, together with the environmental impact.

One respondent considers it insulting for the Council to suggest development will be a cure for social problems in the area.

Oxfordshire County Council considers some parts of the site are located too far away from the existing Bretch Hill Premium bus route and indicates that the possibility of extending/re-routing bus services needs to be explored further.

Officers Response

1.8.4 Summary of responses to Banbury - Land at Bankside (phase 2)

70% of respondents do not support the strategic housing allocation at Bankside, Banbury

2.5.4.1 Reasons for supporting Banbury – Land at Bankside (phase 2):

- Recognise the need for further homes in Banbury and especially affordable housing for local people
- It is an acceptable compromise to some of the issues affecting Banbury, but only if the traffic issues on Oxford Road/South Bar and Cherwell Street are addressed

2.5.4.2 Reasons for not supporting Banbury – Land at Bankside (phase 2):

- The site is in Bodicote and not Banbury
- Spoil views
- Impact on wildlife
- Impact on existing residential properties
- Restrict access to canal walks and the open countryside
- Existing development proposals already have totally inadequate traffic provisions
- Loss of agricultural land
- It will result in the coalescence of Banbury and Bodicote
- There are no infrastructure provisions such as Ring Road/Inner Relief Road
- Create traffic problems

2.5.4.3 Other Comments

Several respondents suggest that the proposed allocation is only viable if adequate infrastructure is implemented.

One respondent suggested that the eastern edge will require substantial screening.

A developer suggested the delivery of the site is at risk because it can only come forward once the existing Bankside scheme is complete. As the existing scheme has yet to commence work on site, the delivery of BAN3 is consequently at risk.

One respondent feels that the council did not deal with the genuine concerns of many residents from both Bodicote and Bankside regarding the 1100 house development.

Another respondent suggests that in relation to the land south of Bankside, the proposed allocation is not supported by the evidence base and is poorly related to the urban area contrary to the strategic objectives for Banbury.

One respondent argues that the part of the site, closest to Oxford Road, may provide some potential for development. However, further east development on the plateau overlooking the Cherwell Valley would be unacceptable in terms of the likely impact on landscape character and views from within and from across the valley. It is considered that there is insufficient suitable land for a strategic site in this location.

One respondent argues that the proposed allocation is within the parish of Bodicote and not part of Banbury. They feel that the Council is expecting them to take on both this allocation for 400 dwellings and a share of 350 dwellings that have been allocated to the village group that Bodicote has been put in. They feel this is unfair and that the allocation of 400 dwellings in Bodicote is contrary to Policy RA1.

Bodicote Parish Council refers to point B.75 which states "Additional development in this area would enable the consolidation of new infrastructure" and questions whether the addition of more houses will make a difference as this has already been agreed with the approval of the existing Bankside extension.

One respondent suggests that it will be difficult to provide sustainable public transport to the Land at Bankside (BAN3), as a public transport route has already been agreed with the developers for the previous Bankside development.

Officers Response

1.9 Question 6: Are there any other sites you think should be allocated as a strategic housing location within the Core Strategy?

1.9.1 Summary of responses

2.6.1.1 General Comments

One respondent suggests using a larger site to the South of Banbury.

Another respondent commented that Bloxham has identified some areas which would be better developed than some of the proposed.

One respondent suggests the larger sites within the existing village envelope of the larger sustainable villages, thereby providing a means of security both market and affordable housing in a range of locations.

Another respondent suggests there are some sites within the bounds of Banbury that could be allocated to housing, with a change of use, for example the old Crest Hotel office building (Malt House Walk) that is falling into dereliction.

2.6.1.2 Specific Site Suggestions

- Old Alcan Factory Site, Banbury
- Land South of Broughton Road, Banbury
- Broughton Road, Banbury
- Wykham Lane, Banbury
- Land North of Hanwell Fields, Banbury and Land West Of Warwick Road, Banbury (in preference to Land at Bankside, Banbury)
- Land West of White Post Road and South of Banbury
- Land at Milestone Farm and Broughton Road, Banbury
- CEMEX's Site, Merton Street, Banbury
- Thames Water Land, South of Thorpe Way, Banbury
- Old Playing Field at the bottom of Hanwell Fields, Banbury
- Land at Calthorpe Street, Banbury
- Land at Middle Wretchwick Farm, SE Bicester
- South East Bicester
- Graven Hill, Bicester
- South West Bicester should be a firm allocation
- Bicester Airfield
- Land West of Webb's Way, Kidlington
- Oxford Technology Park, Kidlington
- Campsfield House, Kidlington
- RAF Upper Heyford
- Four sites in Wroxton – Field adjacent to existing village hall, Infill site opposite Old Policy House on Stratford Road, Infill site opposite Wingtree Cottage on Main Street and a paddock opposite The Chantry on Stratford Road

- Land at Gosford and Water Eaton
- Land at South Lodge, Caversfield
- Land North of Finmere

Officers Response

1.10 Question 7: Do you support the principle of reserve sites?

	Yes	No	Total
No of Responses	112	100	212

1.10.1 Summary of responses

52% of respondents support the principle of reserve sites.

2.7.1.1 Reasons for supporting the principle of reserve sites:

- There is a need to allocate a diverse portfolio of suitable sites to be able to offset and manage risk of delay in delivery e.g. eco-town
- Necessary to introduce flexibility / contingency in the overall spatial strategy / to ensure a robust strategy
- To provide a spread of sites
- To meet housing targets
- Only if there is a good reason to build on these locations and not because there is pressure from vested interests
- Obviously there is a balance to be struck between releasing the sites too early while being pragmatic

2.7.1.2 Reasons for not supporting the principle of reserve sites:

- Vital that the focus is on the Canalside site to ensure it is fully developed / better to focus on primary sites with appropriate infrastructure
- The reserve sites are unsustainable / due to their size would lack infrastructure
- Creates uncertainty for communities / local concern / blights land / leaves door open for future development / encourages developer speculation
- Creates uncertainty for landowners and their businesses / concerned about possibility of compulsory purchase
- Would create additional traffic and congestion
- They imply an 'either/or' concept allowing limited choices
- More logical planning in the first place would preclude the need for these
- Should be firm allocations to avoid uncertainty and to enable full and proper consultation
- Banbury cannot sustain indefinite growth
- Use previously developed land first / focus on areas in need of redevelopment
- The need for further sites should be left to a subsequent review of allocations / reserve sites may hinder future flexibility
- Rural character of the district needs to be preserved
- Do not support housing growth generally
- The most suitable sites should be developed
- Just avoids allocating other sites / should identify enough land for a firm allocation elsewhere such as the south of Banbury and Graven Hill, Bicester

- Would exceed housing requirements
- Reserve sites undermine planning efforts
- Would be target driven rather than because of local evidence
- Concerned about further growth without investment in road infrastructure
- Undue reliance on North West Bicester could place the urban focus of the strategy at risk
- Whole strategy is wrong
- Just a way of adding more sites

2.7.1.3 Other Comments

Bucknell Parish Council comments that only if sufficient infrastructure is provided to support the development of such sites.

One respondent comments that they support reserve sites if they do not destroy the villages around Banbury.

Several respondents including Hanwell Parish Council did not support the principle of reserve sites because of economic uncertainties with Canalside, any reserve sites could easily become strategic sites / would in effect be allocated.

Several respondents including Epwell Parish Council commented that the proposals represent further Greenfield development / would diminish the countryside & natural habitats.

Several respondents including Drayton Parish Council are concerned that it may hinder the development of more complex / Brownfield sites / encourage developers to 'hold out' for the easiest option / will be an invitation to developers.

Several respondents including Middleton Stoney Parish Council felt it was not clear on the reasons for reserve sites.

Several respondents including the Highways Agency commented that it is not clear how the reserve sites would be brought forward / how will reserve sites work if under-delivery elsewhere is due to market conditions.

Officers Response

1.11 Question 8: Do you support the locations proposed for reserve strategic housing allocations?

Reserve Site Locations	Yes	No	Total
South West Bicester	91	120	211
Banbury - Land west of Warwick Road	74	162	236
Banbury - Land north of Hanwell Fields	79	182	261

1.11.1 Summary of responses to South West Bicester

57% of respondents do not support the reserve strategic housing allocation at South West Bicester.

2.8.1.1 Reasons for supporting South West Bicester:

- The SW Bicester Phase 2 site would not have an impact on existing villages
- Most sustainable site
- No significant constraints
- Could be combined with Phase 1 coherently
- Well located to Bicester / services and facilities / phase 1 facilities / well served by public transport / good access to park & ride
- Would benefit from new strategic infrastructure
- Potential to provide another primary school, new cemetery & local centre
- Better and more deliverable than NW Bicester
- Defined boundary of perimeter road would prevent urban sprawl
- Deliverable & can come forward quickly
- Would afford a high degree of certainty
- Support increased number of dwellings
- High quality design would be facilitated by Design Codes for phase 1

2.8.1.2 Reasons for not supporting South West Bicester:

- Greenfield site
- In an area already prone to traffic congestion
- Precedent for further development
- Coalescence with Chesterton / impact on setting & amenity of Chesterton
- Goes against spatial strategy and will contribute to urban sprawl
- Impact on rural character / negative visual impact
- Sustainability appraisal not undertaken fairly and consistently
- Should be allocated, and not be an isolated, unused reserve site

- Part of NW Bicester should be left in reserve instead
- SE Bicester a more sustainable site / would have less impact
- Single reserve site at Bicester would not ensure a 5 year supply
- Should have same status as NW Bicester
- Allocation of NW Bicester ahead of SW is not sound, not based on robust or credible evidence
- Not achievable within plan period nor suitable compared to Graven Hill
- Relies on phase 1 which has no clear phasing plan

2.8.1.3 Other Comments

The Highways Agency has reservations about this being a reserve for eco-housing, separated from the main eco-development by the A4095. South of Caversfield preferred as it is closer.

One respondent would only support the proposal with adequate infrastructure.

One respondent suggests growth is being forced on Banbury.

Officers Response

1.11.2 Summary of responses to Banbury - Land West of Warwick Road

68% of respondents do not support the reserve strategic housing allocation at Land West of Warwick Road.

2.8.2.1 Reasons for supporting Banbury – Land west of Warwick Road:

- Area already built-up / facilities in place
- Lesser quality agricultural land than west of Bretch Hill
- Immediate access to footpath/cycleway network
- Good access to northern employment areas
- Benefits from greater frequency bus services linking to employment areas & town centre
- Opportunity to provide a small local centre
- Will be needed as an allocated site because of reservations about the capacity of Canalside and the deliverability of Bankside within the plan period

2.8.2.2 Reasons for not supporting Banbury – Land West of Warwick Road:

- Site is inherently unsustainable and would offer little infrastructure
- Impact on Drayton village / Drayton Lodge
- Negative impact on the setting and character of Drayton Conservation Area
- Impact on wildlife
- Intrusion on rural area and environment of village
- Goes against spatial strategy and the focus on larger villages
- Development would breach the rim of the 'Banbury bowl' / be prominent in long distance views / views from public rights of way
- Landscape sensitivity and capacity study says the site has low capacity for development
- Topographical constraints
- Proximity to Neithrop Fields Cutting geological SSSI
- Proximity to medieval village & abbey parkland
- Greenfield land
- Principle of development is unacceptable
- Impact on Hanwell Community Observatory / light pollution
- Drayton and Hanwell have no facilities
- Considerable distance to employment areas / town centre / key destinations / services and facilities
- Poor accessibility to Hanwell Fields facilities / across main road / not safe
- Additional traffic / increased traffic to town / poor bus service
- Core Strategy does not reflect the results of BANITLUS
- Should be prioritised above land west of Bretch Hill
- Due to constraints of Canalside and doubts over deliverability of Bankside, both Warwick Rd and West of Bretch Hill will be needed
- Impact on Hanwell village

- Better options to the south of Banbury
- Site would not have defined boundaries
- Breaches the boundary defined by Warwick Road
- Would be ribbon development / poor integration with town
- Impact on residential amenity
- Sustainability appraisal not undertaken in a fair and consistent manner
- Site too small / would result in inappropriately high density & no open space
- Insufficient capacity to be a reserve site & uncertainty about timing
- Would in effect be allocated / would be an 'open-door' for developers
- Identification as a reserve site creates uncertainty
- Objection to centrally imposed housing targets
- Reduces land availability for local food production
- Additional CO₂ emissions / pollution
- Would reduce the business opportunities for Drayton Leisure Golf Centre
- Stray golf balls and floodlights from adjoining driving range would cause a nuisance / affect residential amenity
- Incompatibility with golf / camping / entertainment activities at Drayton Leisure Golf Centre
- Recent developments need time to settle down
- Southern end of site includes an old landfill
- Blight to farming business
- Would be affect by light pollution from North Oxfordshire Academy

2.8.2.3 Other Comments

The Highways Authority supports the locations of the reserve sites in Banbury.

The Environment Agency comment that any proposal will need to have regard to the historic landfill on the site in the Drayton Railway cuttings, and suggest including key criteria for development within this policy.

Several respondents including Hanwell Parish Council argue that it would contribute to urban sprawl and have an urbanising impact on countryside, landscape and rural area.

Oxfordshire County Council comments that it will be difficult to provide a sustainable bus service.

Several respondents including Hanwell Parish Council comment that it would result in coalescence / would erode the gap between Banbury and neighbouring villages.

Several respondents including Bodicote Parish Council suggest the site should be a firm allocation.

Officers Response

1.11.3 Summary of responses to Banbury - Land north of Hanwell Fields

70% of respondents do not support the reserve strategic housing allocation at land north of Hanwell Fields.

2.8.3.1 Reasons for supporting Banbury – Land north of Hanwell Fields:

- Ideal place for development as spine road & facilities are already in place in the existing development
- Area is already built up
- Capacity for 400-440 homes
- Space for a secondary school
- Part-owned & controlled by a house builder
- Landowners wish to bring site forward
- Restrictive covenants can be secured to provide long-term certainty for the open-setting between the site and Hanwell in the context of policies to protect the landscape

2.8.3.2 Reasons for not supporting Banbury – Land north of Hanwell Fields:

- Greenfield site
- Offers little new infrastructure / little scope for mixed use development / open space
- Drayton and Hanwell have no facilities / Hanwell school oversubscribed
- Impact on enjoyment of countryside / informal recreation / views from public rights of way
- Impact on rural quality of life / tranquillity
- Impact on Hanwell village / identity of village
- Proximity to Neithrop Fields Cutting geological SSSI
- Negative impact on Hanwell Conservation Area & Listed Buildings
- Encroachment into open countryside / Urban sprawl / ribbon development
- Council previously promised no further development in this direction
- spine road is a 'natural' boundary for the town
- Landscape Sensitivity & Capacity Study says low capacity for development
- Impact on setting of Banbury / breaching the edge of the 'Banbury Bowl'
- Poor accessibility to Banbury's services & facilities
- Increased traffic / through traffic through Hanwell / along spine road / to town centre / roads unsuitable
- Noise
- Pollution / additional CO₂ emissions
- Vulnerable to crime & disorder from the town
- Impact on residential amenity
- Too far from Banbury Town Centre / employment areas / key destinations
- Hanwell Fields needs time to properly establish a community

- Previously refused permission / no change in circumstances
- Area already built-up
- Should focus on regenerating other areas instead
- Better options to the south of Banbury
- Better to focus on one large site
- Impact on natural drainage
- Core Strategy does not reflect the results of BANITLUS
- Contrary to spatial strategy focusing on larger villages
- Sustainability appraisal not undertaken in a fair & consistent manner
- Would in effect be allocated / an 'open-door' for developers
- Separated from other areas by busy roads / not a safe environment / would be poorly integrated
- Uncertainty about timing & capacity
- Objection to centrally imposed housing targets
- All houses in Hanwell Fields should be sold first
- National economic conditions too weak

2.8.3.3 Other Comments

The Highways Authority supports the reserve allocations within Banbury.

Several respondents including Hanwell Parish Council suggest that the site is unsustainable.

Several respondents including Hanwell Parish Council comment that it will erode the small strategic gap between Banbury and Hanwell, cause coalescence and should be Green Belt.

Several respondents including Hanwell Parish Council object due to impact on Hanwell Community Observatory / light pollution / impact on important community facility.

Several respondents including Hanwell Parish Council suggest it will adversely affect wildlife habitats / bat roost / environment.

Hanwell Parish Council comments that land is mostly best and most versatile agricultural land / reduces land available for local food production.

Several respondents including Hanwell Parish Council suggest it will have an urbanising effect on landscape / rural area / long distance views.

Oxfordshire County Council comments that it will be difficult to provide a sustainable bus service.

Several respondents including Hanwell Parish Council are concerned that this will set a precedent for further development / no defined boundary / creates a less defensible edge.

Several respondents including Bodicote Parish Council suggest the site should be a firm allocation.

Officers Response

1.12 Question 9: Do you support the villages identified to accommodate housing in the rural areas?

No of Responses	Yes	No	Total
	120	134	254

1.12.1 Summary of responses

52% of respondents do not support the villages identified to accommodate housing in the rural areas.

2.9.1.1 Reasons for supporting the villages identified to accommodate housing in rural areas:

- The revised Category A villages and the basis upon which they have been selected appears to make sense
- The larger villages should hold some housing growth
- Government guidance recommends that development in rural locations should be encouraged in the most sustainable locations. In accordance with this principle it is appropriate that the majority of housing is directed towards the more sustainable rural locations
- The villages should be allowed to grow in order to support local services. Even the smallest villages may be able to contribute to the housing in rural areas, particularly if services can be sourced nearby in larger villages

2.9.1.2 Reasons for not supporting the villages identified to accommodate housing in rural areas:

- Too many beautiful villages have been destroyed by inappropriate development
- Growth shouldn't just be distributed across only the more sustainable villages; some development should be moved to villages considered less sustainable. These smaller villages would then be more likely to become viable places for shops, bus services etc. and would become more sustainable
- The villages will not be small communities anymore
- No development in villages unless new homes are only built for local people as they do in Wales
- Large scale development should not be imposed on any village. Growth should occur through natural expansion
- Too much emphasis on these villages alone having to accept unwelcome expansion

2.9.1.3 Other Comments

One respondent commented that a blanket restriction on all housing development is unbelievably negative and runs the risk of creating, in the long term, communities where retired people outnumber those of working age with children.

Another respondent said they find the mixing of category A and Category B villages between the allocations in RA2 to be confusing and that it potentially undermines the role of the settlement categorisation.

A developer commented that it is appropriate that the settlements which score most highly against the criteria should receive the largest amounts of development. The forms of development for each tier of settlement identified in Policy RA1 are largely appropriate. However, all three categories of development should also be able to accommodate development to meet local needs. This is different from the Rural Exception Sites policy (Policy RA3) which is to provide affordable housing. A Local Needs policy is designed to meet needs identified by a parish, be they market or affordable housing, or other development such as employment or community facilities. The key criterion is that any development must be supported by the local community and genuinely needed.

One respondent commented that it is difficult to see how the types of development specified for Category A villages in Policy RA1 could bring forward the amounts of development in the four largest (Adderbury, Bodicote, Bloxham and Deddington) as set out in RA2, if 'minor development' is interpreted as 'fewer than 10 dwellings', a common definition used across England, and as set out formally in the Town and Country Planning (General Development Procedure) Order 1995. It is most unlikely that there will be enough available, suitable and deliverable separate sites to bring forward these numbers.

2.9.1.4 Specific Comments about individual villages

One respondent commented that Adderbury is a sustainable location given its services and proximity to Banbury along with public transport services. It is correctly identified as a Category A settlement.

Adderbury Parish Council challenges the categorisation of Adderbury as a type 'A' village. The Parish Council believe that Adderbury only complies with a few of the criteria for this categorisation.

One respondent supports the assumption that Middleton Stoney is categorised as a 'low sustainability' village.

Another respondent is concerned that Fritwell has already seen extensive development over recent years. Adding this additional burden is unreasonable when surrounding villages have not done their bit.

Another respondent commented that The Sibfords are comparatively small and relatively isolated by both distance and topography from urban centres and employment and yet have been categorised, along with the likes of Adderbury and Bloxham "as a larger and more sustainable village". This is flawed and it fails key strategic objectives on reduced dependency on the private car and sustainability.

A respondent supports the categorisation of Cropredy as a Category A village. This is one of the most sustainable villages in the northern part of the District and fulfils an important role both for its own residents and those of nearby villages.

One respondent supports the identification of Chesterton to receive some housing growth, but argues that Chesterton should be a 'Category A' village.

Another respondent argues that Finmere is a sustainable location because of its facilities and regular bus service to nearby towns. For these reasons, they believe Finmere should be a Category A village and should be allowed a larger amount of housing growth than it has been allocated.

One respondent argues that Begbroke should be included in Policy RA2 as CRAITLUS stage 2 identified it as one of the most sustainable villages in the district.

One respondent highlights the facilities in Fringford and the surrounding area, and argues that Fringford is sustainable and should be a Category A village.

Officers Response

1.13 Question 10: Do you support the housing numbers distributed to the groups of villages identified?

	Yes	No	Total
No of Responses	105	128	233

1.13.1 Summary of responses

55% of respondents do not support the housing numbers distributed to the groups of villages identified.

2.10.1.1 Reasons for supporting the housing numbers distributed to the groups of villages identified:

- Support the reduction in rural housing targets due to Bicester eco-town
- Support housing numbers if appropriate infrastructure is put in place
- Re-apportioning growth towards the Category A settlements is considered the most appropriate and sustainable solution to delivering new housing within the Rural Areas

2.10.1.2 Reasons for not supporting the housing numbers distributed to the groups of villages identified:

- Villages know they are likely to have to accept some development, but it needs to be the appropriate number and in the appropriate place for each village and not where the developers or planners think would be a good site
- Excessive in relation to existing village size
- Too many new houses to meet local needs
- The reserved sites should be used, not the villages
- Most of the villages will not be able to support such numbers - schools, facilities and transport as well as transport links
- If you are serious about protecting the identity and character of villages in Cherwell, the balance of new housing needs to move further from the villages and more into the towns
- Singling out supposedly "sustainable" villages for the lion's share of new development, while others get a much lower proportional increase, seems unbalanced and puts the identities of those supposedly sustainable villages in danger

2.10.1.3 Other Comments

One respondent suggests the larger villages identified should be able to meet a range of housing needs, both affordable, key worker/near market and market, and in order to do so, acceptable provision on key sites within an existing village envelope may be a better target than absolute numbers.

Another respondent supports the principles of this policy, but would urge the Council to consider the distribution of development between the villages carefully in order to achieve the best possible solution through the Site Allocations DPD process.

A respondent feels that the Draft Core Strategy provides insufficient information to enable the reader to adequately assess whether the grouping of villages is appropriate or whether the level of housing for each group is reasonable.

One respondent argues that without precise numbers of homes allocated to individual villages it is difficult to comment as there could be local issues with access or impact on immediate junctions.

Another respondent thinks it is important to look at each village independently and not to lump them altogether for assessment.

A respondent comments that whilst the level of growth to be accommodated in the grouping of the 4 North Cherwell villages amounts to 730 dwellings in total; this figure has been arbitrarily reduced below that set out in the South East Plan. It is therefore suggested that, as a minimum, the North Cherwell rural areas allocations be increased by 240 dwellings to total 970 dwellings.

One respondent argues that Cropredy has a low performance in the CRAITLUS report and should not have to sustain more than 45 houses over 26 years without serious improvement to its sewage, schools and road system.

Another respondent feels it should be made clear that numbers will be spread according to population and that Cropredy's allocation can be spread amongst the other villages in Cropredy's cluster.

One respondent argues that the identification of Hook Norton as a Category A village warrants the increased development focus at this location, in comparison to less sustainable settlements within the District.

Another respondent feels that the allocation for Kidlington is insufficient because there is a proven need for more housing.

A respondent considers that there should be more than 220 dwellings allocated to the cluster of villages that includes Arncott, Bletchingdon, Chesterton, Kidlington, Kirtlington, Middleton Stoney, Weston on the Green and Yarnton, as these are some of the most sustainable settlements in the District.

One respondent believes that Ambrosden and Launton have already undergone proportionately significant development in the last few years. An additional allocation of 180 homes between the two villages risks overwhelming each. The distribution proposed at villages such as Arncott and Chesterton also represents a significant imbalance and potential that the rural nature of each village be compromised.

Officers Response

1.14 Question 11: Do you agree with the approach to be used to determine windfall residential properties within villages?

No of Responses	Yes	No	Total
	123	66	189

1.14.1 Summary of responses

65% of respondents support the approach being used to determine windfall residential properties within villages.

2.11.1.1 Reasons for supporting the approach to be used to determine windfall residential properties within villages:

- Development should not be prevented even within the smallest villages, particularly infilling and conversions

2.11.1.2 Reasons for not supporting the approach to be used to determine windfall residential properties within villages:

- The extra houses incurred will have an impact on infrastructure, schools, traffic, and doctor's surgery
- It spoils the character and appearance of the village - gives a clumsy out of character appearance
- All villages should be allowed windfalls
- Could create overcrowding and urbanisation
- Once again villages can be loaded with new properties built in back gardens under the present planning rules - totally destroying the village landscape

2.11.1.3 Other Comments

One respondent commented that it is not clear from the question what is referred to. However, they support the general proposal to allow conversions in all settlements and the development of infill sites in all Category A and Category B villages. They also support the development of sites in any settlement which are to meet identified local needs.

Another respondent supports the proposal in principle but advises that great care needs to be taken to ensure 'over development' does not occur which would create towns out of villages.

A respondent feels that insufficient detail is available to identify criteria for infill development.

Another respondent feels that infilling should not include back gardens as these should be protected green spaces.

One respondent feels the wording of the policy is too vague.

Another respondent argues that the policy is not practical. After 50 years of infilling demanded by planning authorities, most of the available space has been used up.

The Highways Agency has no objection to the approach to be used to determine windfall residential properties within villages.

One developer commented that paragraph B.143 of the Draft Core Strategy identifies that whilst no allowance has been made for windfall provision; such sites are likely to come forward. This will assist in meeting the housing requirements within the villages. Accordingly it is proposed that the Delivery DPD may seek to phase development of allocated sites within villages so that should windfall sites come forward, some allocated sites can be deleted if no longer required. The proposed 'monitoring' approach to windfall provision will lead to uncertainty concerning the delivery of allocated sites. Sites allocated for development require significant investment and lead-in work to ensure their delivery. The proposed approach set out by the Council in Paragraph B.143 would lead to uncertainty over when sites would be required for delivery. This could have a detrimental impact upon the supply of new housing within the District.

Officers Response

1.15 Question 12: Do you support the policies for meeting affordable housing requirements? (Policies H4 & H5)

No of Responses	Yes	No	Total
	153	52	205

1.15.1 Summary of responses

74% of respondents support the policies for meeting affordable housing requirements.

2.12.1.1 Reasons for supporting the policy for meeting affordable housing requirements:

- There is a need for affordable housing in Cherwell
- There is a particular need in rural areas / higher % supported
- 30% affordable housing within major schemes in Banbury and Bicester is reasonable, provided viability, site circumstances and grant availability are considered
- Inclusion of flexibility via an economic viability assessment is supported / will enable housing delivery
- Proposals for Kidlington are supported

2.12.1.2 Reasons for not supporting the policy for meeting affordable housing requirements:

- Percentages are too high / likely to be unaffordable by developers / would reduce property values
- Rural threshold is too low / due to the costs of development / would discourage sites from coming forward / would produce schemes of just 1 dwelling which many social housing providers do not want / would result in developers paying contributions instead and building expensive houses / is not adequately justified by the Affordable Housing Viability Study
- Would question whether rural areas can afford more affordable housing than urban areas
- The threshold of 1:3 is too low and unworkable. The previous threshold of 1:6 should be retained (Middleton Stoney Parish Council)
- Financial appraisals for developments of 3 or more in rural areas would be excessive and inappropriate
- Threshold in villages should be higher to prevent villages becoming 'exclusive'
- An urban threshold of 10 would lead to many small developments that would not provide affordable homes while adding to transport, social, environmental and economic infrastructure pressures (Bicester Town Council)
- Should be a 35% requirement across the district
- Not clear why the requirement for Banbury (30%) is lower than for other areas and why it should vary
- Need more affordable housing in Banbury

- Too much focus on just two areas
- 30% target for Banbury is inflexible and will not help promote development on strategic allocations such as Banbury Canalside. The policy should reflect the additional costs of developing that site
- Affordable housing should be allocated to all / smaller villages
- 'Get out' clauses are too generous. Need to ensure that the requirements are not circumvented (Kidlington Parish Council)
- Should be a return to Council Housing, not expensive semi-private alternatives
- Need more rented housing and not more to buy
- Could result in anti-social behaviour in peaceful neighbourhoods
- Would generate extra traffic, noise and light pollution
- Brownfield sites should be considered
- Needs to be sufficient flexibility built into the policy / needs to be clear that financial assessments will play an important role in assessing mix and tenure
- Policy needs an expressly stated cascade mechanism which, in the absence of RSL take-up, enables off-site contributions or the selling of houses at an agreed discount on a low cost covenant that states that the house can only be sold for an agreed discounted percentage in perpetuity
- Requirement for a financial contribution for part requirement of an affordable home is unreasonable and complex. Provision should reasonably be made to the nearest rounded figure
- Policy is over-detailed / social rented & intermediate housing split should be based on an up-to-date housing needs assessment
- Would distort the housing market, lead to poor quality housing and social inequalities
- Affordable housing would be taken-up by non-resident landlords and allowed to deteriorate
- Policy should be related to bedroom numbers to create larger social homes

2.12.1.3 Other Comments

Cotswold Conservation Board suggests a more ambitious target for rural areas should be set, noting the results of the viability study.

Kidlington Parish Council supports a higher affordable housing requirement.

One respondent suggests percentages should be minimum requirements.

Homes and Communities Agency suggests the target of 3,300 homes should be a minimum amount as the [since revoked] South East Plan indicates that 4,130 should be provided.

The Homes and Communities Agency will review the funding position following 'open book' financial analysis in line with the Local Investment Plan.

One respondent comments that the policy needs to state that the full provision of affordable housing is expected unless demonstrated and validated that a scheme would not be economically viable.

One respondent argues buy and rent schemes are expensive and suggest a need for Council housing.

One respondent feels the proposals will make little overall difference.

Several respondents including Sibford Ferris and Sibford Gower Parish Councils suggest priority should be given to those with local connections.

One respondent comments that the location of affordable housing needs to consider living costs.

One respondent feels that available housing is being taken-up by people moving into the area and so the local waiting list never goes down.

Once respondent comments that local housing need should be met locally.

One respondent feels it is difficult to comment as there is a need to know what level of development there would be in each village.

Banbury Town Council comments that the district and Banbury need more affordable housing, both social rented and shared ownership.

Banbury Town Council suggests each site should be optimised and developers should not be able to duck under the threshold.

Kidlington Parish Council supports the wording of the approach to stop developers in Kidlington ducking under the threshold.

Homes and Community Agency comments that the expectation that the requirements will be met without Social Housing Grant is supported.

Homes and Communities Agency supports an 'open-book' financial analysis approach for potentially unviable schemes.

Bicester Town Council supports a requirement for 30% affordable housing and the distribution suggested.

Kidlington Parish Council comments that the increase from 30% to 35% for Kidlington reflects the different needs of the south of the district and the impact of Oxford.

Several respondents including Hanwell Parish Council feel that the Council should aim for a higher percentage, e.g. 40%.

Bicester Town Council comments that an urban threshold of 10 would lead to many small developments that would not provide affordable homes while

adding to transport, social, environmental and economic infrastructure pressures.

Several respondents including the Highways Agency comment that there should be a higher percentage in the towns rather than less sustainable locations for transportation / environmental reasons.

Blackthorn Parish Council comments that rural areas should not have the highest proportion as they have less facilities and employment opportunities.

Bloxham Parish Council comments that urban people should not be provided with affordable housing in rural areas at the expense of rural applicants.

Bucknell Parish Council suggests there is a need to take into account existing infrastructure and services. Housing standards should not be compromised.

Kidlington Parish Council suggests the threshold for Kidlington should be lowered.

Hanwell Parish Council suggests a high proportion should remain permanently affordable.

Officers Response

1.16 Question 13: Do you support the Councils approach to rural exception sites? (Policy RA3)

No of Responses	Yes	No	Total
	123	39	162

1.16.1 Summary of responses

76% of respondents support the Council's approach to rural exception sites.

2.13.1.1 Reasons for supporting the Council's approach to rural exception sites:

- Exception sites are vital if housing is to be available for local people
- Provision of affordable housing, especially in rural areas, is to be commended
- more affordable housing is needed in towns

2.13.1.2 Reasons for not supporting the Council's approach to rural exception sites:

- Such policies have never really worked as there is little incentive to release land. Better to plan for affordable housing on market housing sites within larger villages. A rural exception policy could remain as a 'sweep'
- No exceptions should be made
- With regard to the reference to partnership working, there is no evidence of the District Council taking any notice of comments made by Bodicote Parish Council
- Sites are either suitable, or they are not
- By destroying farmland, the council is not protecting existing employment sites
- The criteria used to define a sustainable village is questioned

2.13.1.3 Other Comments

English Heritage comment that regard should be given to English Heritage's guidance 'Affordable Rural Housing and the Historic Environment'.

Cotswold Conservation Board comment that it is disappointing that there is not proposal to allocate sites for 100% affordable housing in rural areas where there is an identified local need. There should be such a policy for sites in the Cotswolds AONB. Rural exceptions sites are only one mechanism for providing rural affordable housing.

Bloxham Parish Council comment that rural exception sites should not be so divorced from the village that the residents are isolated and the housing does not fit in with the existing village buildings.

Sibford Ferris and Sibford Gower Parish Councils comment that no landowner will offer such sites as long as there remains the possibility of obtaining a full commercial value under the Draft Core Strategy. The two policies are

fundamentally in conflict. Might be that local housing need could be met provided [with general housing] if at least 50% of those houses come with the same controls as rural exception sites.

Several respondents feel there is insufficient information to comment.

One respondent commented that views of Parish Councils should be taken into account as there could be valid local reasons to reject.

The Highways Agency argues that while a certain level of affordable housing is required in rural areas for social reasons, a strategy which locates a higher proportion in the more sustainable locations of Banbury and Bicester is favoured.

Bucknell Parish Council comments that the policy is impractical. Safeguards to ensure that the local community benefits from exception sites are not inadequate.

Steeple Aston Parish Council argues that exception sites are vital if housing is to be available for local people. The policy of restricting residency in villages of less than 3000 population should be continued as this ensures housing may be available for the young, or old, who wish to remain but who are forced to seek accommodation elsewhere, thus disrupting continuity of families and support in their home villages.

Homes and Communities Agency supports the idea of making rural locations more affordable. They also comment that rural exception sites are important as they provide affordable housing in locations where it may have been otherwise difficult.

Officers Response

1.17 Question 14: Do you support the locations proposed for strategic employment use?

Strategic Employment Site Allocations	Yes	No	Total
North West Bicester	35	120	155
South West Bicester	36	119	155
Banbury - land west of M40	52	138	190

1.17.1 Summary of responses to North West Bicester

Reasons for supporting North West Bicester:

- Bicester needs more employment opportunities to counteract the high level of out commuting

Reasons for not supporting North West Bicester:

- Greenfield site
- Need to retain as farmland (which is also a source of employment)
- The site is not served by a major railway station and is far from access to the M40; as such, it may not be as commercially attractive as other sites which have better strategic road access
- More detail is needed on the employment opportunities to be created
- Concerns over deliverability
- Contrary to the spatial strategy

Other Comments

An awareness of detailed understanding of existing commitments can help inform the employment provided on the North West Bicester site (i.e. the '5000 jobs' number should not be fixed). 5000 jobs on this site could undermine delivery of other employment sites in the town.

Concerns over who the jobs will actually be taken up by – some may be taken by people commuting into the area, whilst some eco town residents would still need to commute to other areas (1 job per home is not sufficient). The development would not therefore be self sufficient.

Oxfordshire County Council supports employment development at Bicester to increase the opportunities for containment by increasing the diversity in the type of employment offered and by providing opportunities to access employment by public transport, walking and cycling. They add that the success of the North West Bicester site as an exemplar eco-extension to Bicester relies heavily on the provision of attractive, reliable and frequent

sustainable public transport to key employment sites outside of NW Bicester and to Bicester town centre and rail stations.

Officers Response

1.17.2 Summary of responses to South West Bicester

Reasons for supporting South West Bicester:

- Well related to existing commercial/retail sites which are popular and well utilised. Opportunity for linkages with these developed sites, therefore minimising future greenfield incursion

Reasons for not supporting South West Bicester:

- Adverse traffic impacts
- Dependent on highways improvements particularly improvements to M40 Junction 9
- No detail on the deliverability
- Other mixed use strategic sites can better meet the short term need for employment provision by phasing development so that employment is provided early on

Other Comments

The Highways Agency reserves judgement until the BicITLUS transport model can demonstrate that this is the most appropriate strategic employment site. They reiterate the importance of the Council continuing to work with the Highways Agency in order to secure its delivery.

Oxfordshire County Council comments that they support employment development at Bicester to increase the opportunities for containment by increasing the diversity in the type of employment offered and by providing opportunities to access employment by public transport, walking and cycling. They add that there is an agreement with the developers for South West Bicester (BIC2) to provide a bus service to this site. The fact that it is located adjacent to the strategic A41 corridor makes this site relatively easy to serve by public transport. Finally, they comment that although this site is referred to as South West Bicester in the Draft Core Strategy, it is more commonly referred to as South East Bicester (as it is south east of the A41) or Bicester Business Park.

Officers Response

1.17.3 Summary of responses to Banbury - Land west of M40

Reasons for supporting Banbury – Land West of M40:

- Support for the site conditional on allowing for direct motorway access and limiting visual impact through low level and landscaped development

Reasons for not supporting Banbury – Land West of M40:

- Greenfield site
- The land is important for other purposes including recreation and would be better allocated for Banbury United Football Club
- Distant from the strategic housing allocations (Oxfordshire County Council)
- The site is within the flood plain (Environment Agency and others)
- Adverse traffic impacts
- Potential for adverse noise impacts (on the nearby residential areas)
- Concern for wildlife

Other Comments

Questions over the relationship with the South East bypass road (Banbury Town Council and others including the Banbury Civic Society).

Oxfordshire County Council comment that the Banbury site BAN6 has not yet been tested in the transport model. Work will be completed by June 2010. However, the distance between the strategic employment site (BAN6) and the strategic housing site at BAN2 is of concern as the existing public transport, pedestrian and cycling infrastructure does not facilitate movement between these two sites. Mitigation of this issue will be required.

The County Council also comment that this site appears to take land which could be safeguarded for the South East Relief Road. If the development proceeds without safeguarding land, the options for delivering this road will be severely curtailed.

Officers Response

1.17.4 General Comments

A policy is needed not only to allocate employment sites but to support the extension of existing employment sites (this would reduce the need to allocate significant numbers of new sites).

Consideration needed of the regeneration of current employment sites (which could also reduce the need to allocate strategic greenfield sites).

Oxfordshire County Council supports the strategy of locating most housing and employment growth in the main towns to enhance opportunities for sustainable travel, and to enable delivery of identified transport infrastructure. They also support mixed land use areas where housing and employment are collocated, so that the need to travel is reduced.

Another respondent criticised locating housing on one side of town and employment on the other, as this will increase congestion.

All employment sites should be near to train stations and should maximise opportunities for public transport, walking and cycling (Oxfordshire County Council).

Maximum parking standards are required for commercial developments to deter private car use and so alleviate adverse transport impacts (Highways Agency).

Concerns over infrastructure provision and deliverability of sites in general.

A mix of employment uses should be encouraged on allocated sites (B1, B2 and B8). Conversely another respondent commented that allocations need to be clear on the specific end use, so that impacts such as traffic can be fully evaluated and planned for.

There is a need to consider employment sites in other areas, not just Banbury and Bicester, in particular Kidlington (and Green Belt Review). Opportunities for rural employment need to be explored including small workshop premises for cottage industries.

Concerns that Bicester cannot attract 'high tech' types of businesses, given the competition created by the Oxford Science Park (Caversfield Parish Council).

Allocating sites is not enough – a proactive policy is required to encourage employers (to Bicester in particular).

Again, in relation to Bicester, Oxfordshire County Council states that the Draft Core Strategy needs to promote Bicester more strongly as a new location for educational, scientific and technological sectors and meeting the needs of clusters. This also applies to the section on the spatial strategy (A27) and on economic objectives (A31).

Some new sites were suggested in the comments against this question (in place of or as well as against Question 15):

- Alcan, Banbury
- Southam Road, Banbury (possibly the same as above, but no details given)
- Howes Lane, Bicester
- South East Bicester
- Expansion of Banbury Business Park (Adderbury)

Officers Response

1.18 Question 15: Are there any other sites we should allocate as a strategic employment site?

1.18.1 Summary of responses

General Comments

Deliverability is a key concern - reserve strategic employment sites are needed in case the allocated sites do not come forward as expected (Cherwell M40 Investment Partnership; comment also echoed by Oxfordshire County Council).

Smaller sites are also needed to ensure there is a balance of provision of sites.

A realistic assessment of site availability and deliverability is required (the same as for housing allocations).

Focus should be on regenerating or redeveloping existing brownfield sites across the district rather than allocating strategic greenfield sites.

Allocated sites should have a broad 'employment' designation and should not favour one type of employment over another. 'Low tech' uses should not be forgotten.

Infrastructure investment is required to bring sites forward.

Need a greater understanding of the interaction between commercial property market and housing.

Allocations that have not yet come forward should also be considered (i.e. Oxford Spires Business Park, listed below).

Oxfordshire County Council made a comment against this question in relation to the Canalside site, stating that the existing Canalside site (BAN1) is very accessible by public transport, and currently supports a large number of enterprises. Although it is strongly supported for housing through the transport evidence undertaken, it is not known where these businesses will relocate to and this is an important aspect of this site. The Canalside draft SPD gave insufficient attention to this issue.

Specific Site Suggestions

- North of Canal, South of M40, east of Hardwick Hill, Banbury
- 'Site D' (Options for Growth) – Thorpe Way area and land west of M40, Banbury
- SAPA, Banbury (particularly to accommodate businesses relocated from the Canalside area)
- Need to consider in more detail the future of businesses on Canalside
- North East Caversfield, Bicester

- South East Bicester/South of Langford Village/land between A4421 and the A41 or south of the A41
- Garden Centre, Bicester
- Regeneration of Murdock Road, Telford Road estates, Bicester
- Oxford Technology Park, Kidlington
- 'Additional land at Kidlington' (not specified)
- Phase 3 Oxford Spires Business Park, Kidlington remains undeveloped (and meeting need for housing land is a top priority)

Officers Response

1.19 Question 16: Do you support the locations proposed for strategic urban centre allocations?

Strategic Urban Centre allocations	Yes	No	Total
Bicester – Land at Bure Place Car Park	71	7	78
Banbury – Land at Bolton Road	95	7	102
Banbury – Land between Castle Quay Shopping Centre and Spiceball Leisure Centre	94	11	106

1.19.1 Summary of responses to Bicester - land at Bure Place Car Park

95% of respondents support the strategic urban centre allocation Bicester: land at Bure Place Car Park.

2.16.1.1 Reasons for supporting Bicester – Land at Bure Place Car Park:

- Need to build upwards
- Provision of additional facilities

2.16.1.2 Reasons for not supporting Bicester – Land at Bure Place Car Park:

- There are concerns about flooding and water capacity
- Car parking spaces in the town centre should be a major consideration
- Respondents have raised concerns about traffic and access issues`

2.16.1.3 Other Comments

Respondents have stressed that issues relating to road infrastructure need to be addressed and specified in the policies.

One respondent feels there are too many vacant shops in Bicester which have been empty for years and more shops are unnecessary.

Bicester Town Council welcomes the inclusion of the site but has raised concern about the timescale (which does not reflect the current projected completion date of late 2011). They welcome the commitments of a new bigger, modern library to replace the present one and a new civic building.

The Highways Agency support the locations proposed for strategic urban centre allocations but reiterate the necessity to include a parking policy that minimises parking spaces in sustainably located town centre locations.

Middleton Stoney Parish Council supports the proposal but comments that it is likely to become a 'drive to' destination and yet there are no proposals for road infrastructure improvements.

Officers Response

2.16.2 Summary of responses to Banbury - land at Bolton Road

93% of respondents support the strategic urban centre allocation Banbury: land at Bolton Road.

2.16.2.1 Reasons for supporting Banbury – Land at Bolton Road:

- Sustainable, Brownfield site located in the town centre
- Opportunity to secure a wide range of uses in a highly accessible location

2.16.2.2 Reasons for not supporting Banbury – Land at Bolton Road:

- Parking should be retained – valuable parking asset
- Concerns have been raised that council tax is high and money should not be spent on unnecessary projects
- Traffic and access issues are raised

2.16.2.3 Other Comments

One respondent suggests that minor development through re-using derelict buildings is considered the best approach.

CPRE note that the provision of retail/mixed use land at Bolton Road in Banbury could help to repair a *frayed edge* within the conservation area.

Banbury Town Council believes the Bolton Road Area is suitable for town centre expansion. They comment that the area needs enhancement, but the number of alleyways could link well with the old town and the recently pedestrianised Parsons Street.

Banbury Town Council stress that car parking provision needs to be included at this site and also feel it is a good site for a town centre supermarket, which the town currently lacks.

The Highways Agency support the locations proposed for strategic urban centre allocations but reiterate the necessity to include a parking policy that minimises parking spaces in sustainably located town centre locations.

One developer supports the allocation of the site. The site provides a significant Brownfield opportunity to secure a range of uses in a highly accessible location site and it would contribute towards increased floorspace requirements. They support the initial approach outlined in paragraph B.92 but ask for reference to be made to include *leisure uses* on the site (to reflect Gala Bingo). They stress the need for high quality design given it's location in the setting of the conservation area and various listed buildings.

One respondent comments that a multiplex cinema should have been built in Banbury 10 years ago.

It has been suggested that rejuvenating and upgrading the existing areas in Banbury TC is the best approach. The existing buildings are pleasant but

have been neglected. Parson Street has been given as an example of going through a successful ‘facelift’ and it is suggested the rest of the town follows.

Banbury Civic Society are concerned that the allocation of Land at Bolton Road will result in ‘clone shops’ being situated there. Development at Bolton Road should be of appropriate scale, massing and layout to complement and respond to the historic medieval burgage plots on the southern side of the site and the variety of alleys and back buildings. Conservation principles should be key to the policy to preserve and enhance the historic setting by listed and locally-listed buildings and the conservation area. The ideal place for ‘clone retail’ would be best placed at Calthorpe Street / Marlborough Road, as this would encourage footfall back to the town's core.

One respondent comments that Bolton Road lies within the existing defined Town Centre Shopping Area and it is therefore important that any development is properly integrated with the established retail core and does not undermine efforts to protect and enhance its vitality and viability.

One respondent has queried whether the existing multi-storey car park would remain?

Several respondents suggest that car parking should be a major consideration.

Officers Response

1.19.3 Summary of responses to Banbury - land between Castle Quay Shopping Centre and Spiceball Leisure Centre

89% of respondents support the strategic urban centre allocation Banbury: land between Castle Quay Shopping Centre and Spiceball Leisure Centre.

2.16.3.1 Reasons for supporting Banbury – Land between Castle Quay Shopping Centre and Spiceball Leisure Centre:

- Will provide an opportunity for an improved and larger performance/theatre venue as part of a redeveloped of the Mill Arts Centre complex
- A multiplex cinema should have been built in Banbury 10 years ago

2.16.3.2 Reasons for not supporting Banbury – Land between Castle Quay Shopping Centre and Spiceball Leisure Centre:

- Concerns about flooding
- The area by the library is underused
- Encroaching on green areas at Spiceball
- Traffic and access concerns are raised
- Area by the existing library is under utilised, so no need to encroach on green space

2.16.3.3 Other Comments

One respondent suggests that rejuvenating and upgrading the existing areas in Banbury TC is the best approach. The existing buildings are pleasant but have been neglected.

Banbury Civic Society are concerned that the removal of the Library to the Cultural Quarter will hasten the decline of the old town, unless mitigated by other policies and exciting development on the current Calthorpe Street and Marlborough Road car park sites. Retention of the historic parts of The Mill in their entirety is considered essential to successful or desirable development within the Cultural Quarter.

One respondent comments that Banbury does not need more tax funded 'culture'. The focus should be on new small businesses to fuel growth and new opportunities-which is considered difficult at present.

One respondent is concerned that St Mary's, Banbury, has not been included into plans in relation to the Cultural Quarter which is very odd given its large size and lively Arts programme.

One respondent suggests only premises above past flood levels should be considered and that there is no need for more shops as so many are vacant; they also doubt whether more offices are required.

The Highways Agency support the locations proposed for strategic urban centre allocations but reiterate the necessity to include a parking policy that minimises parking spaces in sustainably located town centre locations.

One developer suggests that the allocation should be expanded to include the North Canal car park. It provides an opportunity for parking to support the development of the quarter and also has the potential for redevelopment (subject to the appropriate re-provision of parking).

One respondent suggests the range of uses for the "Cultural Quarter" should be expanded to include uses that are complementary to the anticipated cultural uses and the established town centre uses. Examples include hotel and leisure uses.

Banbury Town Council supports the Cultural Quarter. The Town needs a site for a new library and facilities such as a theatre/cinema, and an art gallery and other commercial development are also favoured. The site will need to include car parking, probably on the ground floor with building above to prevent damage to buildings during any possible flooding.

The Environment Agency expresses concern that the site is within the floodplain of the river Cherwell. They recommend that this is highlighted in the Core Strategy, and criteria for development are added to the policy. This site will also require a Level 2 SFRA and a Sequential and Exceptions test to be demonstrated, in order to provide a robust evidence base for this allocation in the Core Strategy, and to be consistent with the national planning policy PPS25. EA also make reference to their comments made to the Canalside allocation which also apply to this site.

The 'cultural centre' does not appear to be an accurate description for the site (historically or geographically). Banbury is recognised worldwide by the Banbury Cross - the centre should be near here. Sites at Calthorpe Street and Marlborough Road areas are suggested.

Officers Response

1.20 Question 17: Are there any other sites we should allocate as a strategic urban centre allocation?

1.20.1 Summary of responses

2.17.1.1 General Comments

One respondent comments on Banbury High Street and Market Place; they suggest that these areas should be rejuvenated by freshening up shop fronts and encouraging new shops/cafes to the old heart of Banbury.

Another respondent suggests that in the medium term, Bicester Town Centre needs to be expanded.

One respondent comments that the proposals for Oxford Technology Park, Langford Lane, Kidlington, are part of a cluster that offers the same advantages as a strategic urban centre.

2.17.1.2 Specific Site Suggestions

- Bolton Road, Banbury
- Land between Castle Quay and Spiceball, Banbury
- Land west of Calthorpe Street, Banbury
- Land between Calthorpe Street and Marlborough Road, Banbury
- Bicester Village
- Land at Bure Place Car Park, Bicester
- Kidlington Village Centre
- Oxford Technology Park, Langford Lane, Kidlington

Officers Response

1.21 Question 18: Do you support the site allocated for the relocation of Banbury United Football club?

No of Responses	Yes	No	Total
	128	224	352

1.21.1 Summary of responses

A number of responses (**SAY HOW MANY**) have been received supporting the relocation of Banbury United Football Club (See Appendix 2); however they have not provided contact details and can therefore not be registered as a representation.

63% of respondents do not support the site allocated for the relocation of Banbury United Football Club.

2.18.1.1 Reasons for supporting the site allocated for the relocation of Banbury United Football Club:

- The site will give Banbury the opportunity for youngsters in the area to have better training and football coaching facilities and will be a great asset to the community
- A conurbation the size of Banbury should have a football club of stature, satisfying the needs of the football watching public and acting as a centre for excellence for the development of youth football in the area
- Will help to secure the long-term future of the club
- Needs to be re-sited in order to allow the regeneration of Canalside
- New club will bring benefits to the community

2.18.1.2 Reasons for not supporting the site allocated for the relocation of Banbury United Football Club:

- Traffic and access problems on a busy road
- Too close to existing residential properties leading to extra traffic, noise and pollution
- Prime land should not be taken, the existing site is preferable
- Loss of open countryside
- Village location is inappropriate for a town football club
- Located too far away from the motorway and railway station

2.18.1.3 Other Comments

Sport England would welcome further discussion with the Council, football club and football association regarding the suitability of the site, as from the information contained in the draft Core Strategy it is not in a position to support the proposal or otherwise.

One respondent supports the proposal provided there is some financial support to help the club move and adequate parking provision is made.

Several respondents suggest the need for a good public transport link between the club ground and the train station, so away fans can get in and out easily.

Several respondents suggest that other more appropriate Brownfield sites should be considered. A number of alternative sites have been suggested including the old Alcan sports field, Spiceball Park and land close to junction 11 of the M40.

One respondent states they already have Banbury rugby club on one side with 16 floodlights and to have further lights is not acceptable. An increase in noise, traffic, litter etc is not sustainable, with the additional 1100 houses for Bankside and no strategic changes in road capacity.

Officers Response

1.22 Question 19: Do you support other policies set out within the draft core strategy?

No of Responses	Yes	No	Total
Overall	123	68	191

Not all policies received representations. Only the ones that received representations are discussed within this section

1.22.1 Summary of responses to Policy SD1 – Mitigating and adapting to climate change

SEEPB comment that they support this policy.

There was support for the policy's recognition of resource efficiency and reducing flood risk (from the Environment Agency).

There was also support from two respondents for the acknowledgement in this policy of reducing travel by encouraging more sustainable travel patterns.

Oxfordshire County Council comments that the district's preferred approach for proposals for renewable and low-carbon energy developments is supported as it is in general conformity with policy CC2 of the SE Plan which says that measures to mitigate and adapt to current and forecast effects of climate change will be implemented through application of local planning policy.

One respondent stated that in the adaptation section of this policy they would like to see a link between achieving climate change adaptation and protecting and enhancing biodiversity. This should be both in terms of helping biodiversity to adapt to climate change, and through recognition of the role of ecosystem services in achieving climate change adaptation. This point was also raised by Natural England and in response to another question by BBOWT.

Another respondent argues that Policy SD 1 is directly contrary to PPS1 in that the policy is extremely generic and leaves all detailed matters for inclusion within an SPD, which would not be subject to independent examination. There is no indication of what percentage / form of renewable energy provision will be sought and no indication of any assessment of the impact of this policy on site viability. The policy is therefore considered unsound. As currently drafted, it is down to the whim of the LPA as to what level to seek. In addition, the policy does not include any reference to size / type of development.

One respondent commented that the proposed strategic allocations conflict with policy SD 1 in that development has not been directed to the most sustainable locations. Development at Wykham Park Farm would make SD 1 more robust.

1.22.2 Summary of responses to Policy SD2 – Energy Hierarchy

SEEPB comment that they support this policy.

One respondent supports the Council's wording of the energy hierarchy in seeking to prioritise a reduction in energy consumption through the use of sustainable design and construction before looking at renewable energy options.

Another respondent does not support the energy hierarchy. In particular they do not understand the prioritisation of decentralised energy over renewable energy.

1.22.3 Summary of responses to Policy SD3 – Assessing Renewable Energy Proposals

SEEPB comment that they support this policy. However, they add that it would be helpful if the Core Strategy were to include a target for CO² emissions reduction to help deliver Policy CC2 of the South East Plan and a renewable energy generation target for the area to indicate the contribution the authority is seeking to make to the regional and subregional renewable energy targets.

Two comments note the increasing relevance of the content of this policy in terms of proposals coming forward. There was one comment of undetailed support for this policy.

One respondent supports the encouragement of renewable energy projects, especially where local sources of biomass feedstock are used. Government policy also encourages anaerobic digestion (AD) systems on farms, both as a source of renewable energy and as a sustainable means of waste disposal and greenhouse gas reduction. Often the conflict between waste management and renewable energy policies creates planning problems for on-farm AD applications.

A respondent suggests that the supporting text should include reference to the Cotswold AONB Management Plan and its content relating to renewable energy proposals. The policy also needs amplification in terms of the suitability of single turbines being dependent on the particular circumstances of each location.

Another respondent suggests that in assessing renewable energy proposals, impacts should be assessed not only on biodiversity designations, but also on habitats and species of principal importance (as listed under Section 41 of the Natural Environment and Rural Communities Act 2006), and Conservation Target Areas, in line with national and regional policy.

One respondent states that although it is understood that national planning guidance does not preclude wind turbine schemes in Green Belts, there is

encouragement for referring to the careful consideration of visual impact on the openness of Green Belts. This was also echoed by another respondent.

One respondent refers to the concern that wind turbine proposals should be treated on an individual basis as there are likely to be adverse impacts. This was also echoed by another respondent.

1.22.4 Summary of responses to Policy SD4 – Combined Heat and Power and District Heating

SEEPB comment that they support this policy.

There was one comment expressing support for this policy. However the same respondent commented that the policy does not go far enough, and should in fact make the use of CHP and DH essential in all circumstances where applicable.

One respondent added that CHP might be ideal for affordable housing schemes (where small heating systems can be integrated across the development).

One respondent noted the rapidly changing economics of CHP and how this is best delivered (as well as concerns over installation/reliability/maintenance). They comment that this policy is likely to become increasingly redundant as it is overtaken by the national timescale carbon neutral targets. The policy should be deleted because of these reasons, and because it unnecessarily restricts the means of achieving carbon neutral development.

One respondent refers to the guidance in PPS1 relating to evidence based requirements and states that the financial impact of the introduction of this policy has not been assessed.

1.22.5 Summary of responses to Policy SD5 – Sustainable Construction

SEEPB comment that they support this policy.

Oxfordshire County Council comments that environment and climate change is a County Council priority, whilst the SE Plan seeks to achieve sustainable development through policy CC1 and to adapt to and mitigate climate change outlined in policy CC2. They would encourage housing development to achieve at least Code Level 3 of Code for Sustainable Homes in line with policy CC4 of the SE Plan and the Oxfordshire Sustainable Construction Advice Note (2009), which has been approved by CDC for development control purposes.

One respondent suggests the policy be amended to refer to the best use of embodied energy within existing buildings, which includes reusing buildings as well as making use of recycled construction materials. This issue is also raised by Banbury Civic Society (not specifically in relation to this policy) who comment that the Core Strategy should make explicit that, where there is a

conflict between existing heritage assets and new development, there will be a presumption in favour of retaining the heritage assets in use to avoid the consumption of building materials and energy and the generation of waste from the construction of replacement buildings.

One respondent suggests that eco standards of construction should be enforced on all growth areas throughout the district. Another respondent comments that Code Level 6 should be required for all new development in Bicester ('BREEAM Excellent') due to the eco town status.

A respondent (the Environment Agency) comments that they support this policy in general because it requires water efficiency in new development. The requirement for Code for Sustainable Homes Level 3 or above will achieve water efficiency standards, which is justified because Cherwell District Council sits within an area of 'serious' water stress and limited water resources. As such they advocate the higher BREEAM 'excellent' level for new non-household buildings.

Another respondent is concerned that this policy seeks to apply Code Level standards which will already be the subject of national regulation through the Building Control and other regulatory regimes. Therefore, they feel it is not appropriate or reasonable for the Council to seek mandatorily to impose higher standards on an ad hoc basis as this policy seeks to do. They note that the Council could quite rightly 'encourage' these standards (perhaps by reducing other financial obligations on a scheme), but not impose.

Another respondent concurs, commenting that parts of the policy are in any event superfluous and other parts are contrary to the national timetable for the introduction of such standards.

These points are raised by another respondent, who does not consider that the evidence base study sufficiently justifies the policy. There is no definition of 'larger schemes'. The financial impact of the policy on schemes needs to be tested. Financial viability is also raised by another respondent.

One other respondent adds that the evidence base needs to be further explained, and that the policy would benefit from added flexibility if development viability is threatened.

1.22.6 Summary of responses to Policy SD6 – Sustainable Drainage Systems (SuDS)

Natural England comments that there are a few designated sites in Cherwell District which depend on, or are sensitive to hydrological conditions in close proximity to them, e.g. Oxford Meadows SAC and Otmoor SSSI. SuDS mitigate the effects of development on local hydrology by maintaining greenfield run-off rates and as such Natural England would like the policy to do more than "encourage" the use of SuDS in these situations, particularly for all new development in Bicester which has the potential to impact on the watercourses which lead through the town to the River Ray.

BBOWT suggests that the delivery of wildlife benefits through provision of SuDS is included in the policy. They add that the references to the Conservation (Natural Habitats & c.) Regulations 1994 should be updated to refer to the Conservation of Habitats and Species Regulations 2010 (the 2010 Habitats Regulations), which came into force on 1 April 2010 to consolidate the various sets of amendments to the previous amendments.

The Environment Agency advises that more emphasis should be placed on reducing surface water run-off where possible, in order to meet the objective of reducing flood risk, which is an objective of PPS25 and the Council's Sustainability Appraisal Framework. It also advises that the policy should be clearer on when a SuDS scheme and a Flood Risk Assessment will be required.

Gosford and Water Eaton Parish Council considers that the inspection, monitoring and maintenance of SuDS is not adequately covered by the policy. They also consider that more clarity is needed in the LDF to provide improved flood risk management and address inadequate or damaged drainage systems by providing preventative maintenance programmes and Surface Water Management Plans.

One respondent suggests that the caveat relating to adoption and ease of maintenance is unreasonable since the location of SuDS is not driven by ease of access but by the need to ensure adequate drainage.

1.22.7 Summary of responses to Policy SD7 – Protection of the Oxford Meadows SAC through Maintenance of Groundwater Flows and Water Quality

One comment of undetailed support for this policy.

BBOWT and other respondents stated that given the poor water quality of the rivers in the District, and the particular sensitivity of some of the wetland habitats, they suggest it would be appropriate for the Core Strategy to promote land management initiatives as described in policy NRM2 of the South East Plan.

Natural England supports this policy, however it would like to see included that water quantity is also protected in particular during operation of a development, as alterations to adjacent rivers or obstruction to natural groundwater flows may alter the flooding regime of the SAC. Furthermore there are other designated sites in the district that depend on, or are sensitive to, hydrological conditions, and so the SuDS policy (SD 6) needs to be strengthened to maintain greenfield run off rates for all new development.

1.22.8 Summary of responses to Policy SD8 – Protection and Enhancement of Biodiversity and the Natural Environment

BBOWT stated that it would be helpful to specifically make mention of species and habitats of principal importance within the policy. Whilst it is explained in the contextual text that these features should be considered at sites of regional or local importance, this is not the usual approach (for example, PPS9 considers the two issues separately), and it would therefore be helpful to clarify this within the policy itself.

BBOWT also considers it essential that a mechanism is identified by which the biodiversity enhancements required by this policy can be delivered, and would support a tariff based approach to secure this.

1.22.9 Summary of responses to Policy SD9 – Conservation Target Areas

Natural England requests that the policy is extended to cover development within a 1 km buffer of the CTA where the aims of the CTA can be implemented within development. In this way the CTAs can be buffered and extended.

1.22.10 Summary of responses to Policy SD10 – Cotswold Area of Outstanding Natural Beauty (AONB)

The Cotswold AONB Conservation Board suggests the policy should be widened to include impact on the setting of the AONB.

Natural England suggests the policy could go further to describe some of the forms of development that it considers to be potentially damaging and inappropriate, in order to provide more guidance.

1.22.11 Summary of responses to Policy SD11 – Local Landscape Protection and Enhancement

Bicester Town Council advocates the creation of green buffer zones between new Bicester and surrounding open landscapes and rural communities.

One respondent welcomes the decision to replace local, non-statutory landscape designations with a criteria-based policy. This is more likely to enable farm businesses in designated landscape areas to achieve the reasonable level of agricultural development needed to keep them commercially viable and competitive. They will then continue to be in a position to provide cost-effective landscape and environmental management as a by-product of their agricultural activity.

One respondent requests the inclusion of a criterion to allow for exceptions e.g. where development is required to deliver other policies in the Core Strategy.

1.22.12 Summary of responses to Policy SD12 – Oxford Green Belt

One respondent suggests the Core Strategy should include more details of the proposed railway station at Water Eaton and the effect that this will have on the Green Belt. Another respondent considers the policy should make allowance for Water Eaton Parkway station and the resultant relocation of the aggregates terminal as these proposals will enable wider strategic objectives to be met.

Another respondent is concerned that the gap between Kidlington/Yarnton and Oxford is being squeezed from both sides.

One developer suggests a strategic review of the Green Belt should be carried out as part of the Core Strategy. Alternatively, the Council should provide an evidence base that justifies the reason for not undertaking a review.

A respondent commends the declaration to respect the concept of Green Belt around Oxford and urge the Council to resist any further attempt to develop land within the Green Belt.

One respondent suggests a small scale review of the Green Belt around Kidlington should be considered, to allow the allocation of land at Langford Lane, Kidlington for Oxford Technology Park.

1.22.13 Summary of responses to Policy SD13 – The Built Environment

Sport England is concerned that this policy does not adequately reflect and build on the vision of the Core Strategy and strategic objective 13 regarding improving the health and well-being of those who live and work in the district.

1.22.14 Summary of responses to Policy NWB1 – Strategic Allocation 1: North West Bicester Eco-Development

One respondent suggests the Code for Sustainable Homes target should be level 4 to reflect the guidance set out in PPS1.

1.22.15 Summary of responses to Policy H1 – Housing Distribution

One respondent disagrees with the proposed distribution of housing across the district and the emphasis on the NW Bicester eco development to take a large proportion of properties that should have been distributed in North Cherwell.

Another respondent suggests the housing numbers in Policy H1 need to be adjusted to more accurately reflect the South East Plan.

1.22.16 Summary of responses to Policy H2 – Ensuring Sustainable Housing Delivery

One respondent supports the inclusion of the exception in this policy and promote its retention in the submission draft of this Document.

1.22.17 Summary of responses to Policy H3 – Efficient and Sustainable Use of Land

One respondent supports the intention to meet 40% of housing needs using previously developed land and urge the Council to increase this figure further.

Another respondent suggests the approach within the policy should be to incorporate a guideline figure of 33%, to reflect current evidence.

A respondent advises that it should be recognised within this policy that previously developed land supports important biodiversity habitats.

One respondent suggests that although Policy H3 refers to seeking to make efficient use of land, the Core Strategy should include a policy commitment to contributing to the regional density target of 40 dwellings per hectare, as set out in Policy H5 of the South East Plan.

1.22.18 Summary of responses to Policy H4 – Affordable Housing Target

One respondent states that policy H4 is looking to provide at least 25% of new housing 2006-2026 as affordable housing, which is below the target of at least 40% for Central Oxfordshire in the South East Plan (Policy CO3) and the overall regional target of 35% for social rented and intermediate housing (Policy H3). Given that the supporting text states that Cherwell has a huge need for affordable housing and that the recent viability study concludes that in some rural areas a higher level would be possible, they consider that the options should be examined further to enable the delivery of more affordable homes.

1.22.19 Summary of responses to Policy H5 – Affordable Housing Requirements

One respondent objects to the specification that affordable housing requirements will be met without the use of social housing grant. Whilst this may be reconsidered along with the composition of affordable housing in the event of development being rendered unviable, this is unduly prescriptive.

1.22.20 Summary of responses to Policy H6 – Housing Mix

Open respondent suggests it is inappropriate for the Council to seek to micro-manage the size and type of market housing to be provided as part of new developments.

Another respondent suggests policy H6 should be limited to the first sentence and the specified mix of dwellings should be deleted.

A respondent feels that not all large scale developments will provide appropriate locations for retirement/downsizing homes.

One respondent states that they note the need for more family housing and suggests the Council aims to retain existing family sized homes and resists the sub-division of properties.

Another respondent is concerned that the policy is too restrictive and will not result in the development of dwellings which genuinely meet needs at the time they are built.

One respondent believes the housing mix is far too prescriptive and should be a district-wide target, not a target to be used for every site.

1.22.21 Summary of responses to Policy H7 – Extra Care Housing

One developer feels it would be unreasonable for developers to have to comply with a policy that states 5% of properties must fall in this category, if the RSLs do not consider there to be a need for affordable extra care homes.

Another respondent argues that this approach is not economically viable on smaller sites; it is understood that the economies of scale are such that developments of this type require in the order of 40-50 extra care homes for market sale if they are to be economically viable.

1.22.22 Summary of responses to Policy H8 – Travelling Communities

One respondent argues that the policy excludes Green Belt. Circular 01/2006 and case law show that Green Belt may be considered in exceptional circumstances which include a lack of alternatives.

Another respondent suggests that consideration should be given to shortening the list of criteria and making the policy more positive in line with guidance.

One respondent suggests consideration needs to be given to the relocation of the existing site which is within the Canalside regeneration area. They would suggest the expansion of the successful site in Bloxham.

The Environment Agency supports the inclusion of flooding criteria in this policy. Mobile homes and caravans are classified as "highly vulnerable" in PPS25, and should not be permitted in Flood Zone 3a and 3b. But they should also be avoided in any areas of flood risk, in line with the sequential approach, so they recommend changing the wording to "avoiding areas at risk of flooding".

1.22.23 Summary of responses to Policy E1 – Employment Development

One respondent supports the policy, acknowledging its conformity with PPS4.

The Cotswolds Conservation Board supports this policy.

Bicester Town Council also supports the policy.

One respondent supports the policy but notes the contrasting approach being taken at Canalside.

One respondent suggests it is important to provide support for employment in rural areas, particularly to meet identified local needs. Whilst the policy says that proposals in rural areas will be supported where they meet local needs there is no explanation of how local needs will be identified. The policy would restrict the redevelopment of existing employment sites outside Banbury and Bicester, and the conversion of rural buildings (for example as part of a farm diversification scheme). The policy should be amended to provide greater support for rural businesses and conversions of existing rural buildings.

Another respondent generally supports the policy but also comments that the last criterion makes the policy inflexible. They refer to the example of Bodicote, and a potential employment development at Cotefield Farm which could serve local needs and those of the wider areas. However this potential would be missed through the inflexibility of the policy. This comment is also echoed by another respondent who, whilst supporting the policy's reference to a range of employment sites and many of the criteria, also questions the reference to urban areas only.

One respondent, in relation to a particular site in Bicester, comments that the policy should also allow flexibility to allow employment sites to operate within a range of commercial uses, whether B use class or not. Furthermore a buffer zone should be established around employment sites in which residential and other sensitive uses will not be permitted, in order to protect commercial operating requirements.

Chiltern Railways supports Policy E1 in that new employment development should be located with good access to public transport. This will be particularly important if the District is to attract "knowledge economy" employers, who are dependent on good connections and the ability to attract staff from a wide area.

Prodrive Motorsport Ltd supports the intention to continue to protect existing employment land and buildings, and the criteria set out in the policy. Prodrive also supports the acknowledgement that there may be cases where an applicant wishes to change the use of a site or redevelop it for a non-employment use, and that these cases will be considered with regard to specific criteria as listed. Paragraph A.164 of the Draft Core Strategy is in accordance with Policy EC2 of PPS4, which requires planning authorities to ensure their policies are flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances; and identify a range of sites to facilitate a range of economic development. Prodrive supports the intention to ensure a balanced portfolio of sites is made available to support economic growth across the district, on

the understanding that the proposed strategic allocations for employment use in Banbury and Bicester and further smaller allocations sit alongside the existing site allocations. Prodrive also supports the delivery of a flexible supply of employment land via the Delivery DPD.

One respondent comments that the policy should be amended to encourage the redevelopment of existing employment sites to provide modern and efficient facilities for mixed employment development (not all of the requirements for employment land will be met through strategic allocations). Existing employment buildings will continue to perform a crucial role in the growth and diversification of the local economy. Many businesses may wish to expand or to redevelop their existing facilities. This should be encouraged where it would help secure local employment opportunities or where it could improve the efficiency of existing businesses. This can also help to meet environmental objectives by providing better performing buildings in terms of the use of energy and resources.

The South East England Partnership Board suggests the policy includes reference to achieving smart growth to reflect the SE Plan, explaining what this requires and how it will be encouraged in terms of the six key principles: employment; enterprise; innovation and creativity; skills; competition; and investment in infrastructure, including transport and physical development. In order to promote smart growth and help reduce future transport demands, policies should actively encourage the development of communications technology infrastructure in accordance with the SE Plan and set out how opportunities to promote advances in ICT and new ways of working (i.e. home based businesses will be realised). They wish to see reference to partnership working to promote smart growth and skills and training.

Oxfordshire County Council comments that the section on economic issues is somewhat low key in terms of any spatial dimensions around Bicester's role although it is referred to later in the document e.g. under the vision for Bicester. The strategy needs to promote Bicester more strongly as a new location for educational, scientific and technological sectors and meeting the needs of clusters. This also applies to the section on the spatial strategy (A27) and on economic objectives (A31).

1.22.24 Summary of responses to Policy E2 – Supporting Urban Centres

One respondent said it would be helpful if Policy E2 could set out the hierarchy of town and village centres in the district and set out the distribution of additional floor space for main town centre uses over the plan period.

One developer suggests criterion 6 should be re-worded in order to retain control over existing retail development outside the three urban areas, without eliminating future development prospects. They suggest the policy be amended in order that existing retail development outside the Council's preferred urban centres can be measured against the provisions in Planning Policy Statement 6.

1.22.25 Summary of responses to Policy I1 – Infrastructure

A respondent suggests the policy should be amended so that it complies with the latest national policy relating to Community Infrastructure Levy.

1.22.26 Summary of responses to Policy I2 – Green Infrastructure Network

Sport England feels the policy or supporting text does not appear to build on the use of the term 'of value' within the policy and it is therefore unclear how the value of a site or feature will be measured or whether the evidence base provides this detail.

Oxfordshire County Council considers that references to networks, links and connectivity should be made more overt by stating "linkages through walking and cycling routes and public rights of way".

1.22.27 Summary of responses to Policy I3 – Open Space, Sport and Recreation Provision

Sport England supports the basis of the policy but requests a number of amendments to the wording.

Banbury Town Council suggests the Council needs to consult and work with the Town Council when looking at open spaces and recreation.

1.22.28 Summary of responses to Policy I4 – Local Standards of Provision

Banbury Town Council suggests a need to deal with deficiencies identified and work to the standards outlined to ensure provision meets local need. It also stresses the need for outdoor sports provision to be accompanied by adequate changing facilities.

Sport England has a number of concerns regarding the inclusion of one combined standard for all outdoor sports provision. The inclusion of the one standard does not provide certainty as to the nature of, or demand for, provision that development proposals will be required to contribute towards. In addition, it is unclear how appropriate the 10 minute walk/drive time accessibility standard is for each type of provision included under the 'outdoor sports provision' heading. The minimum size requirements and the realistic onsite thresholds are also likely to differ greatly for each type of provision within the category. It is also noted that the policy does not include qualitative standards of provision. Sport England and another respondent comment that as the PPG17 study was carried out in 2006 there may be a need to update the evidence base to adequately support the draft Core Strategy.

Natural England comments that where new open space provision seeks to maintain established character or increase ecological connectivity between two sites the area needs to be large enough to be functional irrespective of the local standards.

One respondent considers that this policy is a development control policy and should be included in the delivery DPD rather than the Core Strategy.

The policy should make it clear that the eco-development is subject to separate open space standards in line with the PPS1 supplement.

One respondent considers the standards excessive and queries whether a viability assessment has been carried out.

One respondent considers the policy should be written more flexibly to allow for combined children's play area schemes as an alternative to LAPs, LEAPs and NEAPs.

1.22.29 Summary of responses to Policy I5 – Built Sport, Recreation and Community Facilities

Sport England requests deletion of the words “to seek to” to strengthen the policy in line with the wording of Policy I3. Sport England welcomes the inclusion of separate standards of provision in table 12 but considers that quality and accessibility standards need to be included. It suggests that policies I3, I4 and I5 should be combined into one policy and linked back to the vision and strategic objectives.

Another respondent also suggests that policies I3, I4 and I5 are combined for succinctness.

1.22.30 Summary of responses to Policy BIC2 – Employment land at South West Bicester

A respondent advises the area identified for employment land at South West Bicester is adjacent to Bicester Wetland Reserve Local Wildlife Site. Any proposals for development here should be able to demonstrate that they will not negatively impact on the LWS.

1.22.31 Summary of responses to Policy BIC5 – Meeting the Need for Open Space, Sport and Recreation in Bicester

BBOWT comments that restoration of Stratton Audley quarry should deliver biodiversity enhancements in line with the wildlife interest of the site and to meet requirements of PPS9 for development to enhance or add to biodiversity resources.

1.22.32 Summary of responses to Policy BAN1 – Strategic Allocation 4: Banbury Canalside

One respondent supports the regeneration of Canalside as a strategic housing allocation but is concerned at the level of proposed ‘town centre uses’ i.e. retail, leisure and office.

1.22.33 Summary of responses to Policy BAN4 – Reserve Strategic Allocation 2: West of Warwick Road

One respondent objects as the Council has not adequately demonstrated that housing needs cannot be met by sequentially preferable sites.

1.22.34 Summary of responses to Policy BAN5 – Reserve Strategic Allocation 3: North of Hanwell Fields

A respondent objects as the Council has not adequately demonstrated that housing needs cannot be met by sequentially preferable sites.

1.22.35 Summary of responses to Policy BAN6 – Strategic Allocation 7: Land west of M40

One respondent suggests the site should not be restricted to B1 and B2 uses.

1.22.36 Summary of responses to Policy BAN7 – Supporting Banbury Town Centre

A respondent is concerned that the extension of the ‘town centre’ to the east of the town centre will stretch the established retail core and undermine its vitality and viability.

Another respondent suggests the boundary needs refining to identify a retail core and, if necessary, a periphery where other town centre uses would be considered appropriate.

1.22.37 Summary of responses to Policy BAN9 – Strategic Allocation 9: Banbury Cultural Quarter

One respondent suggests the proposed allocation for the ‘Cultural Quarter’ should be extended to include the North Canal car park.

Another respondent argues the range of uses proposed for the ‘Cultural Quarter’ should be expanded to include those which are complimentary to the anticipated cultural uses.

1.22.38 Summary of responses to Policy BAN10 – Meeting the need for open space, sport and recreation in Banbury

Banbury Rugby Club considers that the LDF documents (including the evidence base) fail to acknowledge adequately the breadth and depth of rugby in Banbury, and that Bodicote Park should be protected for playing rugby.

1.22.39 Summary of responses to Policy RA2 – Distribution of Housing in the Rural Areas

One respondent believes this policy of restraint is the appropriate way forward for both Kidlington and Yarnton, and the other Green Belt settlements.

1.22.40 Summary of responses to Policy RA4 – Directing Employment in the Rural Areas

A developer accepts that allocating land to meet employment needs in rural areas should be a matter for a separate DPD; the policy should be expanded to provide support for employment to meet identified local needs, for the redevelopment of existing rural employment sites and for the conversion of buildings to provide new employment units.

1.22.41 Summary of responses to Policy MON1 – Housing Land Supply: Bicester

One developer comments that Policy MON 1 sets out the monitoring thresholds for housing delivery, below which the reserve strategic allocation at SW Bicester Phase 2 would be brought forward. The policy also suggests that the release of land at SW Bicester Phase 2 may be phased to reflect the level of shortfall that is experienced.

They do not consider this to be a suitable approach to ensuring housing delivery. Policy MON 1 would effectively preclude any planning application for Phase 2 coming forward before 2016 at the earliest, with the next window of opportunity coming in 2021. While Phase 2 is not of the same scale as NW Bicester, and will benefit from being able to integrate into infrastructure created for Phase 1, the lead-in time for delivering housing on the site should not be underestimated. If an application is delayed until 2021, then it is unlikely that a meaningful level of development could be delivered on site before the end of the plan period in 2026.

Furthermore, phasing the delivery of housing from Phase 2 to reflect a shortfall would be inappropriate. Phase 2 will be a significant development, which will need to be planned and delivered comprehensively, and with certainty that it can be carried through to completion.

To phase the delivery of housing on Phase 2 according to the ability, or otherwise of another site to deliver housing would be inefficient, and would create difficulties in meeting overall housing targets for the district.

Paragraph 7.7 of the South East Plan recognises that the regional housing figures given are unlikely to meet demand for housing and will require an upward revision in a future review of the plan. This paragraph also contains reference to the opportunity for local planning authorities to provide higher than allocated levels of housing through the LDF process. It is therefore considered that the distinction between NW Bicester and SW Bicester Phase 2 is unnecessary. Giving both sites an equal status and allowing them to be brought forward independently of one another would give the Council the greatest opportunity to meet the housing allocation in the South East Plan.

The Hanwell site is unsustainable due to poor infrastructure and is becoming an extension of Banbury town. The proposed BAN 4 and BAN 5 are disruptive to a small village and its wildlife.

1.22.42 Summary of responses to Policy MON3 – Housing Land Supply: Banbury

One respondent suggests the triggers set out in Policy MON3 will not enable the 'reserve sites' to come forward in sufficient time to make good the shortfall which could occur.

Another respondent is concerned that this policy would only allow for the release of the reserve sites in the event that BAN1, BAN2 or BAN3 fail to

come forward in a sufficient timescale (i.e. in 2016-2021). Greater flexibility should be afforded to release reserve sites in the event that other commitments fail to be delivered.

1.22.43 Other Comments

The Environment Agency recommends a policy is included on flood risk, particularly as there are strategic sites at risk from flooding. It comments that there may be locally specific criteria to be set in the policy to help with the application of flood risk management principles, e.g. guidance on building behind flood defences. It recommends a number of areas which the policy should address.

Gosford and Water Eaton Parish Council requests the inclusion of a section on cemetery provision for Kidlington as the existing burial ground will soon be full. They also request that proposals to improve Kidlington's flood defences are included in the LDF and that development upstream of the flood defences should contribute towards their improvement.

Officers Response

1.23 Question 20: Do you have any other comments on the draft core strategy?

1.23.1 Summary of responses

One respondent feels poor access to the M40 is an issue for Banbury district. Either a second Junction south of Banbury or a new river/canal/railway crossing is needed to reduce congestion in the town.

Another respondent argues that Central Government's policy of build at all costs is turning our countryside and small towns into a larger sprawl of concrete. Empty properties and second homes should be put to use for homeless people before new building continues. The Draft Core Strategy is far too long and complicated; it should be condensed and in plain English.

A respondent would prefer to see threshold of 400 units reduced with more sites allocated to avoid (so called) reserve sites and provide more flexibility.

Despite the inclusion in the Local Development Framework of "Canalside", Inland Waterways Association submits that the Draft Core Strategy misses an opportunity to make more of the valley which contains the River Cherwell and the Oxford Canal. This make a north south "green" link running through the district and already makes a huge contribution to the district's environment. There is opportunity to do much more. Districts, e.g. Northampton and Leicester, with similar opportunities, are in their Local Development Frameworks published information showing that they are planning to make much more of their navigable river valleys than Cherwell.

One respondent says there is no mention of religious buildings, even though many of these buildings are central to their townscapes or villagescapes.

Another respondent advises there are inconsistencies between the maps accessible as 'Interactive Maps' and those included within the appendices to the Draft Core Strategy e.g. the boundary of the "Cultural Quarter".

A respondent would support the Vision for Banbury, and is largely supportive of the Spatial Strategy for Banbury but would also like to see recognition of the need for a South East Link Road and the support of CDC to assist Banbury Town Council in lobbying other organisations such as OCC and the Highways Agency.

One respondent feels there needs to be a section dealing with communications over the planning of wireless and satellite towers and providing a good communication network for villages and other urban areas.

Oxfordshire County Council state that there is little or no acknowledgement of the role of partner organisations in shaping and delivering the objectives and policies in the document. There should be greater reference to the roles and responsibilities of Oxfordshire County Council in terms of infrastructure, transport and education and other service provision. The strategy should

reflect the single conversation process / development of a local investment plan. Flowing from this and linked to the Closer to Communities / locality working, the strong emphasis on Bicester and Banbury will help provide a focus for future locality working in these areas, as will the lesser focus on Kidlington.

One respondent argues that whilst the document highlights the importance of the preservation and enhancement of the area's natural and built environment it fails to address the importance of preserving and enhancing Cherwell's fragile historic environment and non designated heritage assets. Whilst a number of specific policies address the potential for harm to the historic and natural environment (such as H8 Travelling Communities and SD3 Assessing Renewable Energy Proposals) this is not addressed as a Key Environmental Objective in the Core Strategy.

Another respondent suggests it will be essential that the Core Strategy makes reference to the provision of adequate water and sewerage infrastructure to service all new development and to avoid unacceptable impacts on the environment (such as sewage flooding of residential and commercial property).

A respondent commented that this Draft Core Strategy is only of any value if comments and objectives listed by local people are actually listened to and acted upon.

Bicester Town Council welcomes the commitment to Anaerobic Digester Plant at NW Bicester but would like to see this sized to service the whole of Bicester and queries the use of incineration at Ardley and wonders if these processes have been considered 'in the round'?

Officers Response

1.24 Question 21: Do you have any comments on the Sustainability Appraisal?

1.24.1 Summary of responses

One respondent suggests sustainability will be constrained by CDC's ability to enforce policies where private developers will need to be persuaded to incur extra costs.

One developer states that it is imperative that the sustainability of individual sites is assessed on a consistent basis. From an analysis of the Sustainability Appraisal this does not always appear to have been the case. They are not confident that the site to the south of Broughton Road has been assessed in a fair and equitable manner. In part this is due to its inclusion within the land to the south (and west of Bloxham Road) but otherwise it appears to arise by not considering sites and their potential constraints in a consistent manner. Examples are given.

One respondent finds the weighting given to some villages in the CRAITLUS report confusing. Cropredy has been given a far higher sustainability rating than it can actually deliver, therefore the issue of sustainability in villages needs to be readdressed in some cases.

One respondent ask how the strategy relates to the proposed high speed rail link through the centre of the region.

One respondent argues the proposal to place 400 houses in Bodicote and relocate Banbury Football Club to Bodicote is not compatible with sustainable development.

One respondent suggests that BAN3 would not be sustainable. The use of cars would increase and everywhere is too far to walk or cycle (carrying a load).

One respondent comments that it seems strange to be advocating more building on greenfield sites, when the country will need more food grown locally. There is no provision for allotments, and in fact at least one disappears according to the maps.

One respondent suggests the town needs the flood alleviation scheme to be completed before Canalside can be developed.

Several respondents suggest the work seems to be a broad-brush desk exercise with too many judgements one could challenge.

One respondent raises the issue of theory versus practice. In theory the social economic and environmental aspects show awareness. In practice what is proposed does not tie in. Categorising sustainability is nebulous e.g. a village may have a school but it could already be at bursting point.

One respondent commented that CDC's commitment to reducing carbon emissions from development and to pursue stated policies relating to biodiversity and conservation is to be commended.

One respondent found it very technical and difficult to understand, they could not really relate it to the things that they are concerned about living in Hanwell.

One respondent suggests it is not evident from the plans how (for example) a 50% reduction in car usage will be achieved or where 40% green space is being achieved.

One respondent stated that a succinct green slogan is 'think globally act locally'. They question how we can save the rainforest when we are destroying our own countryside to promote rapid population growth in an overcrowded island.

One respondent asks why farmers are not allowed to remove their farmland from the development map if they so wish.

One respondent asks who is going to live in all these houses and where is all the employment. There are plenty of existing empty houses.

One respondent suggests that empty premises and 'brown sites' in towns where people work should first be priority before destroying villages.

One respondent states that as they have major concerns regarding infrastructure in Bicester and disapprove of the proposed NW option, they must therefore disagree with the Sustainability Appraisal.

One developer comments that while in general the SA framework allows a reasonably objective comparison between sites aligned with the objectives of the Core Strategy, it is too broad brush in some areas to distinguish between sites. Particular concern relates to protecting best and most versatile agricultural land or where this is not possible, taking the lower grades first for development to be a significant omission despite its assessment within the SA elsewhere.

One respondent considers that the sustainability performance of Banbury Canalside has been overstated. The site relies on the extensive relocation of employment uses; this has the potential to extinguish existing businesses, and poses a serious threat to the overall economic performance of Banbury. Economic performance is an important component of the overall sustainability of Banbury.

One developer comments that the SA assesses Land West of Bretch Hill as having 'Mostly Positive' effects on the economic objective. Again, the assessment provides a wholly inadequate justification for this assessment. The SA highlights that the integration with Bretch Hill may reduce social problems, but it is not explained or justified how the site will make a 'Mostly Positive' contribution to sustaining economic growth in Banbury.

One respondent suggests that the Sustainability Appraisal submitted in support of the Core Strategy is deficient in its consideration of the likely impacts of options for housing growth around Bicester.

The same respondent commented that the NW Bicester eco-development performs better than the previously promoted sites, despite the larger scale of development. In those categories where the Eco-town has performed better than its predecessor on the same site, the improvement is not based on evidence that the benefits can or will be delivered. The improvements are generally based upon the criteria set out in the supplement to PPS1, concerned with eco-towns. They also consider the improvement of the Eco-town against the SA objective of encouraging tourism, on the basis that the rarity of eco-towns will attract visitors, to be entirely spurious and symptomatic of an attempt to artificially enhance the apparent sustainability credentials of the allocation.

One respondent asks if anyone actually questioned the assumptions that all of this is based upon and if anyone has been out to physically check what damage could be caused.

One respondent argues that traffic on the A4260 Banbury to Oxford Road will not be sustainable if some or all of the proposed development proceeds. If log jamming of vehicles is not to occur then further consideration needs to be given to road improvements.

One respondent comments that many of the comments and statements are politically driven by government and are unlikely to represent what will really happen. Most families will continue to have two cars; they will use them to travel to and from the motorway to work, shop and use for leisure. Without significant changes to the road system in Banbury gridlock will be the norm.

Banbury Town Council commented that BITLUS identified Canalside as the most sustainable location in terms of transport, but it also highlighted that every arterial road into Banbury was at capacity in the Town Centre, and that they cannot easily be improved or widened due to physical restraints. The Town Council feels that CDC needs to support a South East Link Road and by working in partnership with CDC and OCC they can prioritise this matter.

Bloxham Parish Council considers that the economic needs of the district should sit at the centre of the SA on an equal measure with environmental and social issues. Regrettably, there are shortcomings in the evidence base in this regard e.g. the employment land review.

Sibford Ferris Parish Council argue that although its general thrust is towards a more even distribution of expansion, the Draft Sustainability Appraisal itself fails to weight sufficiently transport problems in remote areas or the problems for the provision of local employment.

Bucknell Parish Council considers that the draft Sustainability Appraisal has been a desk-top exercise which is fundamentally flawed because it fails to take into account the present inadequate infrastructure. Without adequate infrastructure, they do not believe that sustainability is achievable.

Hanwell PC are very concerned at the assessment of sites BAN4 and BAN5 which does not seem to reflect the issues fought over at the Persimmon Appeal Inquiry in 2007 - by CDC itself - and seem overall to indicate that the landscapes are not as worthy of protection as other potential housing sites around Banbury.

Hanwell PC are very concerned at the way the Strategic Site J in Banbury (i.e. Sites BAN4 and BAN5) has been assessed in Appendix 1 Table 35 (Land at NW Banbury) relative to other sites, giving the overall impression that it is of low value and development would make positive impacts.

English Heritage commented that the Sustainability Appraisal that accompanies the draft Core Strategy anticipates further work for all stages of the process. English Heritage has recently published guidance on 'Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment' that they hope will be of assistance in this process in informing the continuing development of the LDF.

The Highways Agency is content that the sustainability appraisal has been satisfactorily prepared in accordance with national guidance and its findings reflect the most sustainable sites of those identified.

OCC Archaeology is satisfied that the Sustainability Assessment includes the preservation of the historic environment within its sustainability objectives.

The Environment Agency commented that in Table 14 it is not clear why Canalside scores more positively than Land west of Concorde Avenue. Both sites are in Flood Zones 1, 2 and 3. Possibly Canalside is seen as partly positive as a result of the Flood Alleviation Scheme, but this would not be correct because the Alleviation scheme is designed to reduce risk to existing development, and is not being delivered by the Canalside regeneration. Also, if these sites are compared to the assessment of Canalside in table 30, a different score is given again. At this stage it is not clear if flood risk reduction can be delivered through implementation as the evidence base Level 2 SFRA and Masterplan have not been produced to a standard where this can be determined yet. More clarity and consistency is needed between the assessments of sites at risk of flooding.

Banbury Civic Society commented that normally part of the evidence base for the preparation of a Core Strategy would be a Historic Landscape Categorisation and, often, an Extensive Urban Survey (EUS). Neither has been available for use within the Sustainability Appraisal, although it accepted that the commissioned Landscape and Visual study covered a number of the usual bases.

Banbury Civic Society is very concerned that the Land at Calthorpe Street (Site N) has been dismissed so lightly. Development here could regenerate the Old Town and induce footfall up the High Street from the Castle Quay area. Clearly the Sustainability Appraisal has not been able to reflect PPS 5.

Officers Response

2 Appendix

2.1 Appendix 1

2.1.1 List of organisations sent a hard copy of the consultation documents

- Highways Agency
- Natural England
- Environment Agency
- English Heritage
- Government Office for South East
- South East England Partnership Board
- Oxfordshire County Council
- South East England Development Agency
- Thames Water
- Anglian Water Services Ltd
- Secretary of State for Transport
- Network Rail

This list does not include the Town and Parish Councils, all District Councillors and the Partnership and Management board of the Local Strategic Partnership who were also provided hard copies of the documents.

2.2 *Appendix 2*

2.2.1 Example of letter of support for Banbury United Football Club