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URGENT BUSINESS AND SUPPLEMENTARY INFORMATION

Executive

1 July 2025

Agenda Item Number	Page	Title	Officer Responsible	Reason Not Included with Original Agenda
7.	Pages 3 - 322	Submission of the Cherwell Local Plan Review 2042 Appendix 7 Summary of representation and officer response	Planning Policy, Conservation & Design Manager, Assistant Director Planning & Development	Appendices published as supplements to the agenda to assist access due to size of documents

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LOCAL PLAN PROPOSED SUBMISSION: TRANSITIONAL ARRANGEMENTS AND PLAN PERIOD			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Transitional Arrangements	Considers that the Local Plan does not meet the transitional arrangements in terms of meeting the 80%	LPR-D-050 LPR-D-142 LPR-D-190 LPR-D-203 LPR-D-227	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met. No further housing is required.
Transitional Arrangements	If the plan is not submitted by 12/03/2025, the council should apply the policies of the 2024 NPPF and therefore seek to identify additional land to meet development needs in full. If there is any risk of	LPR-D-138	Disagree. This is not a correct interpretation of the transitional arrangements.

LOCAL PLAN PROPOSED SUBMISSION: TRANSITIONAL ARRANGEMENTS AND PLAN PERIOD			
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	delay at examination the council must not submit the local plan		
Transitional Arrangements	Queries Oxford City's unmet need being included within Cherwell's own, as on its own it only meets 64% of the 80% minimum	LPR-D-136 LPR-D-138 LPR-D-164 LPR-D-165 LPR-D-203 LPR-D-204 LPR-D-211 LPR-D-223 LPR-D-252 LPR-D-255 LPR-D-258 LPR-D-262 LPR-D-263 LPR-D-267 LPR-D-239 LPR-D-275 LPR-D-282 LPR-D-283 LPR-D-287 LPR-D-289 LPR-D-295 LPR-D-300 LPR-D-303 LPR-D-304 LPR-D-305 LPR-D-308 LPR-D-314 LPR-D-315 LPR-D-320	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met. No further housing is required.

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Transitional Arrangements	The proposed housing requirement is not sufficient in meeting the District's objectively assessed housing need, affordable housing needs or economic growth ambitions	LPR-D-105	Disagree. As set out above, the Plan meets housing need.
Transitional Arrangements	Objects to timescales for the submission of the Local Plan Review Examination	LPR-D-211	Disagree. The LDS has been updated. The time between the Regulation 19 consultation and Submission is appropriate.
Transitional Arrangements	Considers that the council rushed to meet the transitional arrangement	LPR-D-268 LPR-D-276	Disagree. The decision to publish the Regulation 19 Plan was made before the publication of the December 2024 NPPF. It is appropriate and in accordance with legislation and national policy for the Council to progress the Plan in a timely manner.
Transitional Arrangements	The plan does not have an early review policy or make any reference to being reviewed	LPR-D-341	There is no requirement for this to be included in the Plan.
Transitional Arrangements	Notes the late publication of key evidence	LPR-D-233 LPR-D-276 LPR-D-341	Key evidence was available for the Regulation 19 consultation.
Plan Period Paragraph	Objects to the plan period starting at 2020, it should start later	LPR-D-137 LPR-D-136 LPR-D-138 LPR-D-164 LPR-D-165 LPR-D-190 LPR-D-203 LPR-D-204 LPR-D-211 LPR-D-227 LPR-D-250 LPR-D-252	Disagree. The base date is directly related to the evidence informing the CLPR, therefore supporting the appropriateness of 2020 as the base date and 2020 – 2042 as the plan period. Neither policy nor guidance prescribes the use of a plan period starting from a later date; rather the NPPF requires that "strategic policies should look ahead over a minimum 15 year period from adoption" (paragraph 22), which the Plan does, given anticipated adoption in 2026. Much of the evidence has been built over a number of years and has been updated as necessary. Rather than ignoring these years, particularly if need based, the plan reflects on a coordinated timeframe to ensure that this can be monitored appropriately. If the Council were to start the evidence and plan from the adoption date, for example, then it could be that an element of need, be it housing or employment could simply be lost.

LOCAL PLAN PROPOSED SUBMISSION: TRANSITIONAL ARRANGEMENTS AND PLAN PERIOD			
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		LPR-D-255 LPR-D-258 LPR-D-262 LPR-D-263 LPR-D-268 LPR-D-275 LPR-D-282 LPR-D-283 LPR-D-287 LPR-D-295 LPR-D-300 LPR-D-320 LPR-D-341	

LOCAL PLAN PROPOSED SUBMISSION: Summary/Introduction/Plan Vision and Objectives (CHAPTERS 1 TO 2)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Summary	It is unclear what contributions and existing supply is assumed from North West Bicester. The likely supply is likely to exceed that quoted on the table in page 9	LPR-D-237	3200 homes are expected to be delivered on NW Bicester in the plan period which is considered to be a realistic estimate of its delivery.
Summary	Considers the overarching themes to be sound	LPR-D-223	Noted and welcomed.
Vision	Reference to the historic environment within Heyford Park should be included. Suggests wording	LPR-D-274 (Historic England)	Consider that this is not necessary within the vision. It is set out elsewhere in the Plan.
Vision	Welcomes the prioritisation of climate action targets and proposes including cross references to net zero, retrofitting and adaptation	LPR-D-302 (Oxfordshire County Council)	Support is noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Summary/Introduction/Plan Vision and Objectives (CHAPTERS 1 TO 2)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Vision	Broadly in support but notes the vision makes insufficient mention of achieving a modal shift away from the private car and that Woodstock is not mentioned in the vision	LPR-D-290 (West Oxfordshire District Council)	The overall aim of 'modal shift' is the reduction of emissions and promotion of transport sustainability. These are referenced in the vision for climate action targets and good transport links across district and in rural areas. The vision presents succinctly Cherwell's districtwide needs and aspirations to 2042. Woodstock is comprehensively referenced in the Kidlington Area Strategy. Working with partners for investment on infrastructure is one of the vision's aims. This is an area of cross boundary planning which Cherwell addresses strongly within adopted and emerging plans. Planned and recently delivered transport, education, and accessible open space in the Kidlington Area Strategy benefit cross boundary communities.
Vision	No objections to the vision, and notes the boundary with West Northamptonshire as well as that Banbury and Bicester provide key services and amenities for West Northamptonshire residents	LPR-D-343 (West Northamptonshire Council)	Support is noted and welcomed.
Vision	The vision is considered to be sound	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council)	Support is noted and welcomed.
Vision	Supports the vision	LPR-D-315	Noted and welcomed
Vision	Supports the three themes, especially the priority given to Climate Change as theme 1	LPR-D-052 LPR-D-073	Noted and welcomed
Vision	Supports the vision describing increased opportunities for active travel and improved public transport	LPR-D-073	Noted and welcomed
Vision	Welcomes the extension of the plan period to 2042	LPR-D-237	Support is noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Summary/Introduction/Plan Vision and Objectives (CHAPTERS 1 TO 2)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Vision	Supports the vision but the 4th bullet point should be strengthened to refer to a range and choice of housing to meet local needs	LPR-D-221	The vision is, as might be expected, not overly detailed. The range and choice of housing is set out in the relevant policies elsewhere.
Vision	Supports the vision but flexibility is required and suggests amendments in the wording	LPR-D-266	Consider the vision is sufficiently flexible.
Vision	Supports the overarching themes of the plan but objects to the vision and objectives due to the absence of growth at Heyford Park	LPR-D-258	Noted. Policy HEY1 sets out the strategy for Heyford which seeks to secure the delivery of Policy Villages 5 which is retained from the 2015 adopted Local Plan which still needs to be delivered
Vision	Supports the numerous references to the local economy in the vision	LPR-D-298	Noted and welcomed
Vision	The second bullet point refers to the re-shaping of Kidlington, but the plan does not explain how this will be achieved given there is no housing or employment development allocated for Kidlington in the Regulation 19 plan	LPR-D-282	There is existing committed development at Kidlington which will be delivered during the course of the plan period. There is one housing allocation in this plan for the wider Kidlington area.
Vision	More explanation on how development needs will be met over the next 18 years. The vision must explicitly recognise the need to meet locally assessed housing need, and place more emphasis on the need to deliver affordable housing and improve affordability of housing, in particular where there has been an identified need or historic under-delivery of new homes	LPR-D-262 LPR-D-263	The vision is, as might be expected, not overly detailed. The delivery of housing, including affordable housing is set out elsewhere in the Plan.

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Vision	Broadly supports, but suggests there should be a greater emphasis on delivering a wide choice of homes, encouraging growth in the most sustainable settlements and delivering new affordable homes	LPR-D-151	The vision is, as might be expected, not overly detailed. The delivery of housing, including affordable housing is set out elsewhere in the Plan.
Objectives	There should be opportunity to support greater carbon and energy efficiency. The list of heritage assets should be expanded. Suggests amendments to the wording of SO7 and SO14	LPR-D-274 (Historic England)	The objectives are not intended to be overly prescriptive. Heritage assets are set out elsewhere in the Plan.
Objectives	No objections to the objectives	LPR-D-343 (West Northamptonshire Council)	Welcomed and noted.
Objectives	Retrofitting of existing buildings should be mentioned in SO1 and notes the relationship between air quality improvement and biodiversity is unclear in SO4, and so recommends a separate objective on air quality	LPR-D-302 (Oxfordshire County Council)	The objectives are not intended to be overly prescriptive. These matters are set out elsewhere in the Plan.
Objectives	Considers the strategic objectives to be sound	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council)	Welcomed and noted.
Objectives	Supports the objectives, in particular SO4, 5, 10, 12 and 14	LPR-D-240	Welcomed and noted

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Objectives	Welcomes strategic objectives 1, 11 and 15	LPR-D-327	Welcomed and noted.
Objectives	Broadly in support but notes the proposed allocation near Woodstock conflicts with SO11 and SO13	LPR-D-290 (West Oxfordshire District Council)	Disagree. Do not consider the proposed allocation conflicts with these objectives. Consider the proposal does meet housing needs for Cherwell and does focus development in a sustainable location. The site allocation has been justified within the context of the CLPR strategy, the Kidlington Area Strategy and informed by up-to-date evidence. It is informed by extensive and up to date landscape and heritage evidence having regard to landscape and heritage assets including Scheduled Monuments, Blenheim's Outstanding Universal Value as well as the setting of Woodstock.
Objectives	Supportive but they require flexibility. Suggests amendments and signposting from the district wide objectives to the 'place' objectives	LPR-D-266	Consider the objectives are sufficiently flexible. Signposting is not considered necessary as the Plan should be read as a whole.
Objectives	The objectives appear to be appropriate but some hard to achieve. The council should prepare a more positive and proactive strategy, and the objectives should be able to foster and grow a vision for meeting increasing housing needs and seek to alleviate the housing and affordability crisis	LPR-D-262 LPR-D-263	Disagree, some of the objectives will be more challenging but they remain an appropriate set of objectives for the Plan period. The strategy is considered to be positive and proactive. The Plan aims to achieve a higher level of house building above its local housing need.
Objectives	Considers that SO7, 8 and 9 conflict with allocations BAN H3 and BAN M/U2 due to loss of town centre parking and the economic implications of this	LPR-D-186	Disagree. It is considered that the town will still have adequate carparking following the development of these sites.
Objectives	The text should include reference to reshaping Kidlington	LPR-D-282	Reference is made to the reshaping of Kidlington. There is a great deal of development at Kidlington allocated in previous Plans which is yet to build out.
Objectives	Welcomes SO7 but it should be underpinned through the provision of	LPR-D-221	The Plan aims to achieve a higher level of house building above its local housing need. The Plan also seeks to meet employment land needs.

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	an appropriate scale of housing development to meet the need arising from economic development		
Objectives	The strategic objectives make no reference to supporting Cherwell's role in the national economy, supporting science and technology clusters, supporting the Oxfordshire Knowledge spine or the Oxford-Cambridge Arc. There should be clear support for this, and suggests amendments to SO7	LPR-D-247	This is referenced elsewhere in the Plan and does not require specific reference in the objectives.
Objectives	Welcomes objectives SO9 and SO13 but the role of Banbury and Bicester for development should be stressed within them	LPR-D-221	Reference is made to Cherwell's urban centres in SO9 and sustainable locations in SO13. The role of Banbury and Bicester is set out in the Vision and elsewhere in the Plan.
Objectives	Supports the intention of the objective but it should refer to meeting the housing needs of different groups in the community regarding size, type, tenure and affordable housing	LPR-D-211	This is referenced elsewhere in the Plan and does not require specific reference in the objectives.
Objectives	SO12 should recognise the role that the provision of new and easily accessible public open spaces plays in fostering healthy behaviours	LPR-D-221	This is referenced elsewhere in the Plan and does not require specific reference in the objectives.
Objectives	The word 'sufficient' in SO15 should be deleted as it suggests the plan is aiming for a minimum requirement rather than an ample supply of accessible well maintained good quality services, facilities and	LPR-D-221	Disagree, sufficiently covers needs.

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	infrastructure. The objective should refer to aspirations and needs		

LOCAL PLAN PROPOSED SUBMISSION: Our Strategy for Development in Cherwell (CHAPTER 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Spatial Strategy	The majority of new development is focussed at Bicester and the strategy indicates it should be the focus for additional development due to its strategic location on the Oxford-Cambridge corridor. Therefore, requests any further development at Bicester that is not allocated in the Local Plan which would impact the M40 J9 or J10 will be required to submit a full assessment of traffic impact, to include all allocated Local Plan growth	LPR-D-200 (National Highways)	Noted.
Spatial Strategy	Considers the spatial strategy to be sound, including reflecting already committed unmet need and the response to the Green Belt	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council)	Support is noted and welcomed.
Spatial Strategy	It is unclear why the strategies for Kidlington on pages 7 and 21 are not identical. Concern that Woodstock is not mentioned in either	LPR-D-290 (West Oxfordshire District Council)	Noted. The Kidlington strategy on page 21 has been corrected to ensure it is identical to that on page 7. The Spatial Strategy presents succinctly the framework to deliver Cherwell's needs and aspirations to 2042. Woodstock is comprehensively referenced in the Kidlington Area Strategy.
Spatial Strategy	No objections to the spatial strategy	LPR-D-343 (West Northamptonshire Council)	Support is noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Our Strategy for Development in Cherwell (CHAPTER 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Spatial Strategy	Support the spatial strategy	LPR-D-083 (Banbury Town Council) LPR-D-126 LPR-D-134 LPR-D-165 LPR-D-265 LPR-D-279 (Bodicote Parish Council)	Support is noted and welcomed.
Spatial Strategy	Generally support but suggests an immediate review following closely from the adoption of the plan	LPR-D-321	Noted.
Spatial Strategy	Support the strategy, suggests the important role the rural areas play in delivering sustainable growth is acknowledged	LPR-D-269	The spatial strategy focusses new development at the district's main towns of Banbury and Bicester, and to a lesser extent in the Kidlington area. These are the most sustainable locations in the settlement hierarchy. The strategy for the rural areas is to provide for limited development to meet local community and business needs.
Spatial Strategy	Support the strategy but notes concern about the encroachment of towns on greenfield land towards the villages	LPR-D-271(Kirtlington Parish Council)	Concerns noted.
Spatial Strategy	Generally support the strategy, recommends removing 'avoid unplanned development in the open countryside'	LPR-D-297	Noted. Avoiding unplanned development in the open countryside generally conforms with the NPPF.
Spatial Strategy	Generally support the strategy, but concerned regarding the opportunity for the rural areas to deliver the strategy	LPR-D-315	The spatial strategy focusses new development at the district's main towns of Banbury and Bicester, and to a lesser extent in the Kidlington area. These are the most sustainable locations in the settlement hierarchy. The strategy for the rural areas is to provide for limited development to meet local community and business needs.

LOCAL PLAN PROPOSED SUBMISSION: Our Strategy for Development in Cherwell (CHAPTER 3)			
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Spatial Strategy	The spatial strategy does not acknowledge the role rural areas play	LPR-D-214	The spatial strategy focusses new development at the district's main towns of Banbury and Bicester, and to a lesser extent in the Kidlington area. These are the most sustainable locations in the settlement hierarchy. The strategy for the rural areas is to provide for limited development to meet local community and business needs.
Spatial Strategy	Additional sites should be allocated in the villages	LPR-D-151 LPR-D-236 LPR-D-254	The spatial strategy focusses new development at the district's main towns of Banbury and Bicester, and to a lesser extent in the Kidlington area. These are the most sustainable locations in the settlement hierarchy. The strategy for the rural areas is to provide for limited development to meet local community and business needs. Development for new housing in the rural areas is directed to the larger and more sustainable villages that offer a wider range of services and facilities, and to a lesser extent to villages that are well connected to urban areas and sustainable villages. It is expected that a number of rural allocations will be made in emerging neighbourhood plans.
Spatial Strategy	The spatial strategy abandons the need of the rural communities and fails to recognise the need for a range of site types and sizes. Suggests allocations are made across the tiers of the settlement hierarchy Justification for an urban based strategy needs to be amended to allow a better spread of development.	LPR-D-262 LPR-D-263 LPR_D_7❶❶	The spatial strategy focusses new development at the district's main towns of Banbury and Bicester, and to a lesser extent in the Kidlington area. These are the most sustainable locations in the settlement hierarchy. The strategy for the rural areas is to provide for limited development to meet local community and business needs. Development for new housing in the rural areas is directed to the larger and more sustainable villages that offer a wider range of services and facilities, and to a lesser extent to villages that are well connected to urban areas and sustainable villages. It is expected that a number of rural allocations will be made in emerging neighbourhood plans.
Spatial Strategy	The spatial strategy does not recognise that severe housing affordability issues exist in the rural areas. The strategy needs to allow for greater rural housing growth	LPR-D-064	Disagree. The spatial strategy focusses new development at the district's main towns of Banbury and Bicester, and to a lesser extent in the Kidlington area. These are the most sustainable locations in the settlement hierarchy. The strategy for the rural areas is to provide for limited development to meet local community and business needs. Development for new housing in the rural areas is directed to the larger and more sustainable villages that offer a wider range of services and facilities, and to a lesser extent to villages that are well connected to urban areas and sustainable villages.

LOCAL PLAN PROPOSED SUBMISSION: Our Strategy for Development in Cherwell (CHAPTER 3)			
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Spatial Strategy	Considers the strategy fails to meet the housing needs of the district	LPR-D-105	Disagree. The Plan provides for the objectively assessed housing needs for the district.
Spatial Strategy	Object to the omission of Islip as a suitable area for growth	LPR-D-289	Islip is washed over by the Oxford Green Belt. It is not considered that there are any exceptional circumstances for removing the Green Belt in this area.
Spatial Strategy	Object to the absence of proposed growth at Adderbury	LPR-D-320	Adderbury is a designated neighbourhood area. The Local Plan (Policy RUR 1) states that Adderbury should provide 75 homes, to be identified through a neighbourhood plan.
Spatial Strategy	Support the spatial strategy but considers it can be more ambitious.	LPR-D-193	Noted
Spatial Strategy	Supports the objectives to provide development in the rural areas and considers it to be positively prepared but not consistent with national policy. Recommends amendments	LPR-D-220	Noted. The proposed amendment is very minor and is not accepted as it does not add any further clarity.
Spatial Strategy	Objects as insufficient consideration has been given to where re-development should be focused and has ignored brownfield sites such as Graven Hill and Upper Heyford	LPR-D-121	Disagree. Policy COM 1 sets out the district-wide housing distribution. A number of the allocated sites are on previously developed land. Policy CSD 25 addresses the need for the effective and efficient use of land, including previously developed (brownfield) land.
Spatial Strategy	Objects to the absence of proposed growth at Heyford Park	LPR-D-258	The Plan's strategy for Heyford is to ensure the delivery of the committed growth set out in saved Policy Villages 5 of the 2015 adopted Cherwell Local Plan. It supports the development of a new settlement at Heyford Park comprising approximately 2,400 dwellings and approximately 120,000sqm of employment land. A masterplan was approved in 2022 to guide the delivery of the 2015 Local Plan allocation and ensure the planned new settlement responds sensitively to the environmental and heritage context of the site. To date approximately 1,100 new dwellings have been completed and a further circa 1500 homes are committed. The Highways Authority have made it clear that limited further development at Heyford Park is not appropriate in highways terms and a more sustainable solution should be found.
Spatial Strategy	Objects as it only focuses development at Bicester and Banbury	LPR-D-276	The spatial strategy focusses new development at the district's main towns of Banbury and Bicester, and to a lesser extent in the Kidlington area. These are the

LOCAL PLAN PROPOSED SUBMISSION: Our Strategy for Development in Cherwell (CHAPTER 3)			
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			most sustainable locations in the settlement hierarchy. The strategy for the rural areas is to provide for limited development to meet local community and business needs.
Spatial Strategy	Banbury should be seen as equal to Bicester	LPR-D-054 LPR-D-136 LPR-D-190 LPR-D-248	The spatial strategy focusses new development at both the district's main towns of Banbury and Bicester.
Spatial Strategy	Concern that there is no policy in the spatial strategy that looks at Cherwell as a whole. Recommends its inclusion	LPR-D-138 LPR-D-211 LPR-D-250 LPR-D-275 LPR-D-287	The Plan's Spatial Strategy does include a district-wide strategy which is then supported by area strategies.
Spatial Strategy	The spatial strategy does not include direct reference to the priority or emphasis given to the local economy or how the local plan will enable/support this growth	LPR-D-298	The area strategies all reference the need to support the local economy.
Spatial Strategy	There is no policy setting out the overall strategy for scale and distribution of development, recommends its inclusion. The plan fails to recognise opportunities on previously developed land	LPR-D-203	Policy COM 1 sets out the district-wide housing distribution. A number of the allocated sites are on previously developed land. Policy CSD 25 addresses the need for the effective and efficient use of land, including previously developed (brownfield) land.
Spatial Strategy	The plan is not justified by proportionate evidence so there is nothing to test the spatial strategy against. Makes recommendations	LPR-D-282	Disagree. The Council is of the view that the Plan is supported by proportionate evidence.
Spatial Strategy	The plan should state which policies are strategic	LPR-D-203 LPR-D-210	Noted. Appendix 11 of the Plan lists which policies are strategic and non-strategic.
Spatial Strategy	The plan period should be amended to 2024-2045. There is no clear articulation of the plans strategy and	LPR-D-210	Government advice is that local plans should cover a period of at least 15 years post adoption. We expect the Local Plan to be adopted in 2026. An end date of 2042 will meet that requirement. There is therefore no justification for extending

LOCAL PLAN PROPOSED SUBMISSION: Our Strategy for Development in Cherwell (CHAPTER 3)			
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	questions the change in strategy for Heyford Park. There should be further growth here		the plan period to 2045. The Plan's strategy for Heyford is to ensure the delivery of the committed growth set out in saved Policy Villages 5 of the 2015 adopted Cherwell Local Plan. It supports the development of a new settlement at Heyford Park comprising approximately 2,400 dwellings and approximately 120,000sqm of employment land. A masterplan was approved in 2022 to guide the delivery of the 2015 Local Plan allocation and ensure the planned new settlement responds sensitively to the environmental and heritage context of the site. To date approximately 1,100 new dwellings have been completed and a further circa 1500 homes are committed.
Spatial Strategy	Objects as it only meets 63% of the new standard method. The plan period is inappropriate and questions the lack of Duty to Cooperate evidence with Oxford City	LPR-D-210	The Council's Duty to Cooperate Statement of Compliance details the duty to cooperate evidence with Oxford City Council. The transitional arrangements set out in paragraph 234(a) of the NPPF have been met as the draft housing requirement meets at least 80% of local housing need calculated using the December 2024 standard method. The housing requirement figure should include any unmet needs from neighbouring authorities. (NPPF, para 69).
Spatial Strategy	Questions if future growth needs for housing and economic growth have been fully considered for the next 15 years. There is a need for a proper Green Belt review. There is no mention of the Oxford-Cambridge corridor	LPR-D-233	The future growth needs for housing and economic growth are supported by proportionate evidence. A detailed green belt review was undertaken to support the Cherwell Local Plan Partial Review - Oxford's Unmet Housing Needs adopted 2020. A focussed update to this study was undertaken in 2022/23. These studies form part of the local plan evidence base.
Spatial Strategy	The plan should acknowledge the international significance and heritage potential of Heyford Park	LPR-D-004	Policy HEY 1 and Paragraphs 7.10 – 7.14 acknowledge the heritage significance of the site.
Spatial Strategy	Notes concern regarding a lack of physical and social infrastructure. The plan should strengthen transport infrastructure	LPR-D-186	Noted. The Plan requires additional infrastructure, including transport, to support the delivery of the Plan.
Spatial Strategy	Questions the lack of provision for high-value sectors. Suggests amendments to the text. Questions lack of allocations around Kidlington	LPR-D-193	The local plan provides employment land to meet the needs of a range of employment sectors. Policy LEC 1 sets out how the plan meets business needs. In Kidlington, this includes 14.7 hectares of land at Begbroke Science Park as well as delivery of high value employment uses at London Oxford Airport. There are no

LOCAL PLAN PROPOSED SUBMISSION: Our Strategy for Development in Cherwell (CHAPTER 3)			
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			exceptional circumstances to release further land from the Green Belt in the Kidlington area.
Spatial Strategy	The plan period should be amended to match the housing need period, and the timetable should be reconsidered	LPR-D-165 LPR_D_876	Government advice is that local plans should cover a period of at least 15 years post adoption. We expect the Local Plan to be adopted in 2026. An end date of 2042 will meet that requirement.
Spatial Strategy	Questions if future growth needs for new housing and additional economic growth have been fully considered for the next 15 years	LPR-D-341	The Plan meets the objectively assessed needs for housing and employment upto 2042.
Spatial Strategy	Concern about active travel schemes for the elderly and impaired. Questions how transport infrastructure can be strengthened	LPR-D-186 LPR-D-239	The local plan is supported by extensive transport related evidence. Policies CSD 22 and 23 address transport issues.
Spatial Strategy	There is more affordable and social housing needed	LPR-D-327	The Plan acknowledges that there is a pressing need for additional affordable and social housing. The level of affordable housing required in new developments has been informed by viability evidence.
Spatial Strategy	Considers that Thames Water cannot cope with additional sewerage or additional water needs	LPR-D-011	Thames Water has been consulted on the level of growth proposed in the Plan. Some upgrades are required.
Spatial Strategy	Supports active travel improvements and reductions in congestion and pollution	LPR-D-073	Noted and welcomed.
Spatial Strategy	All new sites should have mandatory habitat creation. Suggests amendments to the wording	LPR-D-157	The plan has a suite of policies that address the protection and enhancement of biodiversity, including biodiversity net gain.
Spatial Strategy	There is not enough to show that traffic congestion will have reduced	LPR-D-339	The local plan is supported by extensive transport related evidence. Policies CSD 22 and 23 address transport issues.
Policy SP1: Settlement Hierarchy	Supports the policy	LPR-D-274 (Historic England) LPR-D-161 (Islip	Support is noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
		Parish Council) LPR-D-102 LPR-D-134 LPR-D-185 (Sibford Ferris Parish Council) LPR-D-193 LPR-D-221 LPR-D-223 LPR-D-240 (Fritwell Parish Council) LPR-D-266 LPR-D-269 LPR-D-297	
Policy SP1: Settlement Hierarchy	The Key Diagram should show the already allocated sites in the adopted plans	LPR-D-302 (Oxfordshire County Council)	Noted. The Key Diagram shows the sites allocated in this Plan. Saved policies are shown on the Policies Map.
Policy SP1: Settlement Hierarchy	The Settlement Hierarchy is clearly defined	LPR-D-290 (West Oxfordshire District Council)	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Supports the designation of Banbury as a Main Town and Nethercote as a Category C village	LPR-D-083 (Banbury Town Council)	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Supports Banbury's classification as a Main Town	LPR-D-299	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Supports Bicester's classification as a Main Town	LPR-D-165	Support is noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy SP1: Settlement Hierarchy	Supports Banbury and Bicester's classification as Main Towns but questions the low amount of growth proposed for Banbury	LPR-D-091	Additional sites for development are proposed at Banbury. These reflect the topographical, landscape and rural character constraints of the town's edge.
Policy SP1: Settlement Hierarchy	Objects to Bicester receiving a greater proportion of housing than Banbury when they are both Main Towns	LPR-D-311	Additional sites for development are proposed at Banbury. These reflect the topographical, landscape and rural character constraints of the town's edge.
Policy SP1: Settlement Hierarchy	Supports the identification of Heyford Park as a Local Service Centre	LPR-D-258	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Supports Caversfield's classification as a Category B Village	LPR-D-107	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Objects to Caversfield's classification as a Category B village and questions the criteria used to classify	LPR-D-135 (Caversfield Parish Council) LPR-D-037 LPR-D-040 LPR-D-062 LPR-D-257	The evidence to support Caversfield's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category B villages are defined as settlements that are geographically close to, or with good transport links to, villages and towns with a good range of services and facilities. Caversfield is in close proximity to Bicester therefore it is considered that the village classification is correct.
Policy SP1: Settlement Hierarchy	Objects as Caversfield should be recognised as part of the built-up area of Bicester	LPR-D-211	Caversfield is a village distinct from Bicester.
Policy SP1: Settlement Hierarchy	Objects to the classification of Bloxham as a Category A Village	LPR-D-202 (Bloxham Parish Council)	The evidence to support Bloxham's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category A villages are defined as larger villages, outside the Green Belt, that have essential local services and facilities and often serve nearby smaller villages. They have regular public transport to main towns or local service centres. Bloxham is the largest Category A settlement in the district.
Policy SP1: Settlement Hierarchy	Objects as development should be directed towards Bloxham	LPR-D-164 LPR-D-236	Bloxham is categorised as a Category A village. Policy RUR 1 states that the emerging Bloxham neighbourhood plan should allocate sites for 75 dwellings to 2042.

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Policy SP1: Settlement Hierarchy	Supports Drayton's classification as a Category C Village	LPR-D-095 (Drayton Parish Council)	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Supports Kirtlington's classification as a Category B Village	LPR-D-271 (Kirtlington Parish Council)	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Supports Hook Norton's classification as a Category A Village but notes that the plan should either make rural site allocations, allow sites to come forward flexibly to meet rural housing needs or make a clear commitment to a part 2 plan	LPR-D-255	Support is noted and welcomed. There is an emerging Hook Norton Neighbourhood Plan which will consider allocating sites.
Policy SP1: Settlement Hierarchy	Supports the classification of Deddington as a Category A Village	LPR-D-283	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Supports Fritwell's categorisation as a Category C village	LPR-D-240	Support is noted and welcomed.
Policy SP1: Settlement Hierarchy	Objects to Wendlebury's classification as a Category B Village	LPR-D-219 (Wendlebury Parish Council) LPR-D-325	The evidence to support Wendlebury's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category B villages are defined as settlements that are geographically close to, or with good transport links to, villages and towns with a good range of services and facilities. Wendlebury is in close proximity, and accessible, to Bicester therefore it is considered that the village classification is correct.
Policy SP1: Settlement Hierarchy	Objects to the classification of Middleton Stoney as a Category B Village	LPR-D-201 (Middleton Stoney Parish Council)	The evidence to support Middleton Stoney's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category B villages are defined as settlements that are geographically close to, or with good transport links to, villages and towns with a good range of services and facilities. Middleton Stoney is in close proximity, and accessible, to Bicester therefore it is considered that the village classification is correct.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy SP1: Settlement Hierarchy	Objects to the classification of Great Bourton as a Category B Village	LPR-D-103 (Bourtons Parish Council)	The evidence to support Great Bourton's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category B villages are defined as settlements that are geographically close to, or with good transport links to, villages and towns with a good range of services and facilities. Great Bourton is in close proximity, and accessible, to Banbury therefore it is considered that the village classification is correct.
Policy SP1: Settlement Hierarchy	Objects to Finmere's classification as a Category C village, and that it should be reclassified as a higher category	LPR-D-050 LPR-D-137 LPR-D-210	The evidence to support Finmere's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category C villages are generally smaller villages containing only a limited number of services and facilities. They usually have poor/irregular access to public transport and are some distance from the main towns, local service centres of Category A villages.
Policy SP1: Settlement Hierarchy	Objects to Upper Heyford's classification as a Category B Village	LPR-D-114 (Upper Heyford Parish Council) LPR-D-246 (Somerton Parish Council)	The evidence to support Upper Heyford's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category B villages are defined as settlements that are geographically close to, or with good transport links to, villages and towns with a good range of services and facilities. Upper Heyford is in close proximity and accessible to Heyford Park therefore it is considered that the village classification is correct.
Policy SP1: Settlement Hierarchy	Objects to the limited development at Heyford Park	LPR-D-210 LPR-D-258	The Plan's strategy for Heyford is to ensure the delivery of the committed growth set out in saved Policy Villages 5 of the 2015 adopted Cherwell Local Plan. It supports the development of a new settlement at Heyford Park comprising approximately 2,400 dwellings and approximately 120,000sqm of employment land. A masterplan was approved in 2022 to guide the delivery of the 2015 Local Plan allocation and ensure the planned new settlement responds sensitively to the environmental and heritage context of the site. To date approximately 1,100 new dwellings have been completed and a further circa 1500 homes are committed.
Policy SP1: Settlement Hierarchy	Objects to Wardington's classification as a Category B village	LPR-D-061 LPR-D-167	The evidence to support Wardington's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category B villages are defined as settlements that are geographically close to, or with good transport links to, villages and towns with a good range of services and facilities. Wardington is accessible by public transport, to Banbury therefore it is considered that the village classification is correct.

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Policy SP1: Settlement Hierarchy	Objects to Sibford Ferris and Sibford Gower's classifications as Category B villages	LPR-D-097	Both Sibford Ferris and Sibford Gower are proposed as Category C villages.
Policy SP1: Settlement Hierarchy	Objects to the classification of Fringford as a Category C Village	LPR-D-153	The evidence to support Fringford's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category C villages are generally smaller villages containing only a limited number of services and facilities. They usually have poor/irregular access to public transport and are some distance from the main towns, local service centres of Category A villages.
Policy SP1: Settlement Hierarchy	Objects to Shenington's classification as a Category C Village	LPR-D-250	The evidence to support Shenington's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category C villages are generally smaller villages containing only a limited number of services and facilities. They usually have poor/irregular access to public transport and are some distance from the main towns, local service centres of Category A villages.
Policy SP1: Settlement Hierarchy	Objects to Milcombe's classification as a Category B Village	LPR-D-254	The evidence to support Milcombe's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category B villages are defined as settlements that are geographically close to, or with good transport links to, villages and towns with a good range of services and facilities. Milcombe is in close proximity and accessible to Bloxham therefore it is considered that the village classification is correct.
Policy SP1: Settlement Hierarchy	Objects to the classification of Hempton as a Category B Village	LPR-D-257	The evidence to support Hempton's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Category B villages are defined as settlements that are geographically close to, or with good transport links to, villages and towns with a good range of services and facilities. Hempton is in close proximity and accessible to Deddington, a Category A village, therefore it is considered that the village classification is correct.
Policy SP1: Settlement Hierarchy	Objects as Cropredy should be classified as a higher order village	LPR-D-262 LPR-D-303	The evidence to support Cropredy's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). It does not have all the essential services and facilities, most notably a regular bus service, to meet the criteria for a Category A village.
Policy SP1: Settlement Hierarchy	Objects to Claydon being the same category as Cropredy when Cropredy has more amenities	LPR-D-328 (Claydon with	The evidence to support both Claydon's and Cropredy's village classification is set out in the Settlement Hierarchy Topic Paper (Updated February 2025). Cropredy does not have all the essential services and facilities, most notably a

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		Clattercote Parish Council)	regular bus service, to meet the criteria for a Category A village. It is acknowledged that it does have more facilities than Claydon, but given that they are both relatively distant from higher order settlements their classification as Category C villages is considered correct.
Policy SP1: Settlement Hierarchy	Objects to the classification of Islip as a Category C Village	LPR-D-289	Islip has a good range of services and facilities, but is washed over by the Oxford Green Belt, therefore it is considered appropriate to classify it as a Category C village.
Policy SP1: Settlement Hierarchy	Wendlebury lacks the services and public transport to be considered Category A	LPR-D-015	Wendlebury is not proposed to be a Category A settlement.
Policy SP1: Settlement Hierarchy	Needs to factor in flood risk from Wendlebury Brook and Gaggle Brook into the policy	LPR-D-325	Noted. Policy CSD 7 addresses flood risk management.
Policy SP1: Settlement Hierarchy	The policy is more restrictive in the rural areas than in the adopted Local Plan	LPR-D-297	Noted.
Policy SP1: Settlement Hierarchy	The vision cannot be achieved through the emerging spatial strategy and policies	LPR-D-288	Disagree. The policies and proposals in the plan will enable delivery of its vision and objectives.
Policy SP1: Settlement Hierarchy	Suggests defining 'minor' and 'major' in the settlement hierarchy	LPR-D-209 (Ambrosden Parish Council)	Major development is defined in the Plan's Glossary.
Policy SP1: Settlement Hierarchy	The policy should allow flexibility at the DM stage to enable sustainable development	LPR-D-214	The policies in the Local Plan seek to meet Cherwell's identified needs.
Policy SP1: Settlement Hierarchy	The type of development for each category should be clearly defined	LPR-D-220	It is considered that the Policy does clearly define the type of development for each category.
Policy SP1: Settlement Hierarchy	There is no difference between the type of development in the Main Towns and the Local Service Centres	LPR-D-223	Policy SP 1 defines the settlement hierarchy. Most of the proposed development is directed to the Main Towns.

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Policy SP1: Settlement Hierarchy	There needs to be greater flexibility in permitting development at the edge of Category A Villages	LPR-D-226	Disagree. The policies in the Local Plan seek to meet Cherwell's identified needs.
Policy SP1: Settlement Hierarchy	The type of development supported should include redevelopment of previously developed land outside the built-up limits of all settlements where the sites are well related and connected to the existing settlement. Also questions the need to limit the size of sites at Category B Villages to 1 hectare	LPR-D-234	Policy CSD 25 encourages the re-use of previously developed land in sustainable locations. Category B villages are generally small and less sustainable locations for development relative to higher order settlements. Development should only meet local needs and be proportionate in scale and be sympathetic to the form and character of the settlement.
Policy SP1: Settlement Hierarchy	Objects to the policy as some of the criteria in the settlement hierarchy topic paper are incorrect and no consideration is given to water, electricity and sewage capacities	LPR-D-126	The settlement hierarchy only considers services and facilities. The recorded services and facilities in the Settlement Hierarchy Topic Paper are at a point in time. Corrections/updates where new information is available will be considered.
Policy SP1: Settlement Hierarchy	Objects as the settlement hierarchy does not conform with paragraph 83 of the NPPF	LPR-D-064	Disagree. The Plan reflects the role and function of our settlements, with the two main towns and then local service centres supporting these. The potential for our rural communities to grow and thrive, including through supporting smaller villages, is expressly set out in the settlement category in Policy SP1.
Policy SP1: Settlement Hierarchy	Objects to the term 'built up limits' as this needs to be clearly defined	LPR-D-090 LPR-D-221 LPR-D-328 (Claydon with Clattercote Parish Council)	The Local Plan does not define settlement boundaries, although some villages have boundaries defined in neighbourhood plans. It is considered that the term 'built up limits' is widely understood.
Policy SP1: Settlement Hierarchy	Objects due to the unnecessary restriction on development in the larger/Category A villages	LPR-D-155 LPR-D-300 LPR-D-322	The spatial strategy focusses new development at the district's main towns of Banbury and Bicester, and to a lesser extent in the Kidlington area. These are the most sustainable locations in the settlement hierarchy. The strategy for the rural areas is to provide for limited development to meet local community and business needs.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy SP1: Settlement Hierarchy	Objects as the housing needs are greater than identified in the Local Plan and therefore a more positive and specific spatial strategy is required	LPR-D-263	Disagree. The transitional arrangements set out in paragraph 234(a) of the NPPF have been met as the draft housing requirement meets at least 80% if local housing need calculated using the December 2024 standard method. The housing requirement figure should include any unmet needs from neighbouring authorities. (NPPF, para 69).
Policy SP1: Settlement Hierarchy	Objects as development should be allowed beyond the built-up limits	LPR-D-269 LPR-D-322	The Local Plan seeks to meet the objectively identified needs of the district to 2042. The proposed policies and allocations achieve this. Unplanned development beyond the built-up limits of settlements would undermine the Plan's strategy.
Policy SP1: Settlement Hierarchy	Objects to the term 'local employment' under the Local Service Centre description	LPR-D-282	Disagree. The Plan seeks to meet Cherwell's needs therefore the term is appropriate.
Policy SP1: Settlement Hierarchy	Objects as there is no flexibility for development in the lower hierarchy settlements	LPR-D-315	The settlement hierarchy has the objective of directing development to the most sustainable locations. It is considered that the policy strikes an appropriate balance based on evidence.
Policy SP1: Settlement Hierarchy	Objects as the policy does not propose meaningful new growth at Adderbury	LPR-D-320	Adderbury is categorised as a Category A village. Policy RUR 1 states that the emerging Adderbury neighbourhood plan should allocate sites for 75 dwellings to 2042.
Policy SP1: Settlement Hierarchy	Objects to the 'type of development' allowed in the policy as it is too restrictive	LPR-D-283	The settlement hierarchy has the objective of directing development to the most sustainable locations. It is considered that the policy strikes an appropriate balance based on evidence.
Policy SP1: Settlement Hierarchy	Notes concern that the approach is overly restrictive	LPR-D-226	Disagree. The settlement hierarchy has the objective of directing development to the most sustainable locations. It is considered that the policy strikes an appropriate balance based on evidence.
Policy SP1: Settlement Hierarchy	Raises concern with errors in calculating the village categorisations	LPR-D-037	Noted. An updated Settlement Hierarchy Paper has been prepared to include any necessary corrections.
Policy SP1: Settlement Hierarchy	Raises concern that all villages are categorised as 'rural areas'. This fails to recognise the individual characteristics of villages.	LPR-D-072	Individual settlements are recognised in the settlement hierarchy. It is also appropriate to use the term rural areas when grouping policies, particularly when addressing the spatial strategy.

LOCAL PLAN PROPOSED SUBMISSION: Meeting the Challenge of Climate Change and Ensuring Sustainable Development (CHAPTER 3: Theme 1)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Theme 1 - Generic	The comment climate change is the greatest long-term challenge facing society is inaccurate and should be described as urgent. The plan should reduce demand for heat by limiting new building to limited numbers of two-bedroom terraces. The strategy for meeting housing needs should rely on reducing under-occupation through sub-division, supporting conversion and building almost exclusively from timber. All new housing should be limited to that which meets affordable housing/housing for older people and special cases e.g. self build plots	LPR-D-004	Comments on climate change noted. Disagree on proposed restrictions.
Theme 1 - Generic	Supports the aspirational approach but considers that policies should be amended to provide flexibility in meeting specified targets	LPR-D-151	Disagree. The policies provide flexibility where appropriate.
Theme 1 - Generic	The emphasis on the role of encouraging and enabling sustainable modes of transport is welcomed, as is the explicit and positive references to the shift of freight from road to rail	LPR-D-298	Noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD1: Mitigating and Adapting to Climate Change	Supports the policy but notes concern with criterion iv	LPR-D-165	Support is noted and welcomed.
Policy CSD1: Mitigating and Adapting to Climate Change	Strongly supports the policy principle. Wishes to see amendments to identify specific locations, place greater emphasis on active travel and make reference to net zero	LPR-D-222	Support noted and welcomed. There are other policies in the Plan that provide greater focus on active travel and net zero.
Policy CSD1: Mitigating and Adapting to Climate Change	Supports the overall intention but comments that it is important to state that these requirements do not apply to sites where planning permission has already been secured	LPR-D-225	Noted.
Policy CSD1: Mitigating and Adapting to Climate Change	Supports the policy but notes that net zero by 2030 will be challenging and that climate policies are overly technical for a public document and should be simplified	LPR-D-237	Noted and support welcomed. The policies have been drafted as simply as possible, but as they cover a technical subject this is sometimes difficult to achieve. The Council will consider producing supplemental guidance to assist with the implementation of these policies.
Policy CSD1: Mitigating and Adapting to Climate Change	Supports the policy but suggests more text is on flood risk	LPR-D-327	Support for the policy is welcomed. Policy CSD 7 specifically relates to flood risk.
Policy CSD1: Mitigating and Adapting	Objects as the policy does not reflect an evidence-based strategy and suggests rewording of the policy	LPR-D-093 (Kidlington Parish Council)	Disagree. The policy has been supported by proportionate evidence.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
to Climate Change			
Policy CSD1: Mitigating and Adapting to Climate Change	Objects as it does not cover the effects of wind damage from severe storms	LPR-D-001	The policy requires development to be designed to be resilient to climate change impacts. Wind is not specifically referenced but increased frequency of storms could be argued to be an impact of climate change.
Policy CSD1: Mitigating and Adapting to Climate Change	Objects as the plan fails to base policies on the rates of under-occupancy of existing housing in the district. There is evidence of significant levels of under-occupation of existing housing stock that has the potential of meeting most if not all the housing needs. The housing strategy should encourage and enable low carbon conversions and subdivisions and limit new building to particular housing needs that would otherwise go unmet ie social rent, housing for the elderly and self/custom building.	LPR-D-004	The approach advocated is not consistent with the NPPF's calculation of objectively assessed need.
Policy CSD1: Mitigating and Adapting to Climate Change	Objects to the wording of the policy and suggests various amendments to be made	LPR-D-157 LPR-D-214 LPR-D-221 LPR-D-222 LPR-D-309	The suggested amendments are not agreed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD1: Mitigating and Adapting to Climate Change	Objects as the policies should be clear in stating that compliance with the latest national standards for sustainable design and construction is acceptable	LPR-D-236	Disagree. Policy CSD 1 is grounded in the statutory requirement under Section 19(1A) of the Planning and Compulsory Purchase Act 2004, which requires development plans to include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change. It also aligns with the Climate Change Act 2008 (amended) and the legally binding UK net-zero by 2050 target, the Seventh Carbon Budget (2038-2042), which requires near-zero emissions from new buildings. Additionally, the policy aligns with the 2023 NPPF, particularly paragraph 157, which emphasises planning's critical role in facilitating the transition to a low-carbon economy and paragraph 162, which requires planning applications to address the full range of climate change impacts, including energy use and resilience to extreme weather. Whilst CSD 1 addresses many of the same matters that Building Regulations addresses, the aim of the policy is to ensure climate mitigation and adaptation are holistically considered for all development proposals within Cherwell, a framework that is not cohesively provided by Building Regulations. The Local Plan takes a proactive approach to mitigating and adapting to climate change.
Policy CSD1: Mitigating and Adapting to Climate Change	Would have commented on the soundness of the policy but this is a matter for the statutory water company	LPR-D-102	Noted.
Policy CSD1: Mitigating and Adapting to Climate Change	The policy does not reflect evidence based strategy and considers that the key target is not measurable	LPR-D-093	Disagree. Policy CSD 1 is grounded in the statutory requirement under Section 19(1A) of the Planning and Compulsory Purchase Act 2004, which requires development plans to include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change. It also aligns with the Climate Change Act 2008 (amended) and the legally binding UK net-zero by 2050 target, the Seventh Carbon Budget (2038-2042), which requires near-zero emissions from new buildings. Additionally, the policy aligns with the 2023 NPPF, particularly paragraph 157, which emphasises planning's critical role in facilitating the transition to a low-carbon economy and paragraph 162, which requires planning applications to address the full range of climate change impacts, including energy use and resilience to extreme weather.

LOCAL PLAN PROPOSED SUBMISSION: Meeting the Challenge of Climate Change and Ensuring Sustainable Development (CHAPTER 3: Theme 1)			
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			Whilst CSD 1 addresses many of the same matters that Building Regulations addresses, the aim of the policy is to ensure climate mitigation and adaptation are holistically considered for all development proposals within Cherwell, a framework that is not cohesively provided by Building Regulations. The Local Plan takes a proactive approach to mitigating and adapting to climate change.
Policy CSD1: Mitigating and Adapting to Climate Change	Questions the climate change evidence	LPR-D-078	The climate change evidence is considered to be proportionate and robust.
Policy CSD1: Mitigating and Adapting to Climate Change	Future Homes Standard 2025 should be adopted by the council for the construction standard	LPR-D-321	Disagree. Policy CSD 1 is grounded in the statutory requirement under Section 19(1A) of the Planning and Compulsory Purchase Act 2004, which requires development plans to include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change. It also aligns with the Climate Change Act 2008 (amended) and the legally binding UK net-zero by 2050 target, the Seventh Carbon Budget (2038-2042), which requires near-zero emissions from new buildings. Additionally, the policy aligns with the 2023 NPPF, particularly paragraph 157, which emphasises planning's critical role in facilitating the transition to a low-carbon economy and paragraph 162, which requires planning applications to address the full range of climate change impacts, including energy use and resilience to extreme weather. Whilst CSD 1 addresses many of the same scopes that Building Regulations addresses, the aim of the policy is to ensure climate mitigation and adaptation are holistically considered for all development proposals within Cherwell, a framework that is not cohesively provided by Building Regulations. The Local Plan takes a proactive approach to mitigating and adapting to climate change.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD1: Mitigating and Adapting to Climate Change	The policy is wide ranging and deals with matters for building control, therefore it should be more focussed	LPR-D-223	Policy CSD 1 is grounded in the statutory requirement under Section 19(1A) of the Planning and Compulsory Purchase Act 2004, which requires development plans to include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change. It also aligns with the Climate Change Act 2008 (amended) and the legally binding UK net-zero by 2050 target, the Seventh Carbon Budget (2038-2042), which requires near-zero emissions from new buildings. Additionally, the policy aligns with the 2023 NPPF, particularly paragraph 157, which emphasises planning's critical role in facilitating the transition to a low-carbon economy and paragraph 162, which requires planning applications to address the full range of climate change impacts, including energy use and resilience to extreme weather. Whilst CSD 1 addresses many of the same scopes that Building Regulations addresses, the aim of the policy is to ensure climate mitigation and adaptation are holistically considered for all development proposals within Cherwell, a framework that is not cohesively provided by Building Regulations. The Local Plan takes a proactive approach to mitigating and adapting to climate change.
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Seeks clarity on council approved equivalent local schemes to demonstrate how schemes will be identified and how developers would expect to engage with them. Suggests changes to wording	LPR-D-302 (Oxfordshire County Council)	The proposed amendments are noted, but it is considered more appropriate for these details to be included in supplementary guidance.
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Welcomes the policy but objects to the space heating and energy intensity targets being optional. Consideration should be given to strengthening the policy	LPR-D-290 (West Oxfordshire District Council)	Noted. The standards required by this policy are consistent with national policy, including the December 2023 Written Ministerial Statement (WMS) on Local Energy Efficiency Standards, as well as the interpretation of that WMS outlined in the legal opinion provided by Cornerstone Barristers (February 2024). The standards are also in line with the legal advice on Energy Policy and Building Regulations commissioned by the County Council (available on the Essex County Council website).

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-238 LPR-D-327	Support is noted and welcomed.
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Supports the policy but believes it should be achieved through a national approach	LPR-D-136	Noted. The standards required by this policy are consistent with national policy, including the December 2023 Written Ministerial Statement (WMS) on Local Energy Efficiency Standards.
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Objects and questions the evidence to justify the Building Regulations with respect to efficiency standards	LPR-D-050	The standards required by this policy are consistent with national policy, including the December 2023 Written Ministerial Statement (WMS) on Local Energy Efficiency Standards, as well as the interpretation of that WMS outlined in the legal opinion provided by Cornerstone Barristers (February 2024). The standards are also in line with the legal advice on Energy Policy and Building Regulations commissioned by the County Council (available on the Essex County Council website).
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Objects to the policy as it is written due to the economic implications/ impact on deliverability and viability	LPR-D-078 LPR-D-210 LPR-D-221 LPR-D-221 LPR-D-225 LPR-D-226 LPR-D-259 LPR-D-262	The local plan is supported by a viability assessment. The costs of this policy requirement were factored into the viability modelling.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Objects and considers the policy should be deleted as it is not justified, not consistent with national policy and does not robustly assess the consequences of the policy	LPR-D-138	The standards required by this policy are consistent with national policy, including the December 2023 Written Ministerial Statement (WMS) on Local Energy Efficiency Standards, as well as the interpretation of that WMS outlined in the legal opinion provided by Cornerstone Barristers (February 2024). The standards are also in line with the legal advice on Energy Policy and Building Regulations commissioned by the County Council (available on the Essex County Council website).
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Objects as it goes beyond the Building Regulations and does not conform with the Written Ministerial Statement	LPR-D-165 LPR-D-227 LPR-D-236 LPR-D-321	The standards required by this policy are consistent with national policy, including the December 2023 Written Ministerial Statement (WMS) on Local Energy Efficiency Standards, as well as the interpretation of that WMS outlined in the legal opinion provided by Cornerstone Barristers (February 2024). The standards are also in line with the legal advice on Energy Policy and Building Regulations commissioned by the County Council (available on the Essex County Council website).

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD2: Achieving Net Zero Carbon Development - Residential	The targets are broadly in line with what will be achieved by the Future Homes Standard and so questions if it is necessary as a policy	LPR-D-211 LPR-D-221 LPR-D-226 LPR-D-263 LPR-D-288	The government has released several possible versions of the Building Regulations that are due to come into force in 2025 (the Future Homes Standard/FHS, or Future Buildings Standard/FBS). Analysis has shown that the FHS will not deliver the level of energy efficiency that is necessary for the achievement of the UK's carbon budgets. The previous Government's latest FHS consultation (2023-24) shows that the FHS might not improve fabric at all, whereas the 2019-20 consultation had indicated that fabric would improve (albeit not to the level necessary for carbon budgets as noted above). The national FHS consultation 2023-24 shows that heating bills in one of the FHS options would be double that of a home built today, due to the failure to improve fabric while switching to electric heating (despite the heating system being efficient) in combination with a potential lack of solar panels. This implies a justification for local plan policy on energy efficiency and carbon to exceed those of Building Regulations and the Future Homes Standard, as otherwise it will logically be unable to mitigate climate change in line with the Climate Change Act. Local planning authorities have the legal power, established through the Planning and Energy Act 2008, to reasonably require in their policies: Energy efficiency standards beyond those of Building Regulations, so long as these are 'not inconsistent with national technical standards' A proportion of energy use at the development to be from renewable or low carbon sources 'in the locality of the development' Given CSD 2 and 3 are primarily based upon metrics used in Building Regulations, both policies are entirely in accordance with the Planning and Energy Act 2008 and are therefore justified in exceeding the standards set out in Building Regulations.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD2: Achieving Net Zero Carbon Development - Residential	The policy should only relate to major development and should exclude some forms of building including agricultural/equine buildings	LPR-D-234	Disagree.
Policy CSD2: Achieving Net Zero Carbon Development - Residential	The policy needs to be fully evidenced	LPR-D-266	The policy is informed by robust evidence.
Policy CSD2: Achieving Net Zero Carbon Development - Residential	There is no mention to the use of sourcing sustainable materials in the objective of achieving net zero, and this should be encouraged	LPR-D-297	Policy CSD 1 references this.
Policy CSD2: Achieving Net Zero Carbon Development - Residential	Welcomes the option for applicants to submit detailed justification where full compliance is not feasible or viable	LPR-D-214	Noted and welcomed.
Policy CSD2: Achieving Net Zero Carbon Development - Residential	The Local Plan should seek to achieve net zero carbon emissions from day one, by incorporating renewable energy provision and the integration of transport	LPRD-341	Noted. It is considered that the suite of policies taken as a whole achieve this ambition.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	Seeks clarity on council approved equivalent local schemes to demonstrate how schemes will be identified and how developers would expect to engage with them. Suggests changes to wording	LPR-D-302 (Oxfordshire County Council)	The proposed amendments are noted, but it is considered more appropriate for these details to be included in supplementary guidance.
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-238 LPR-D-327	Support is noted and welcomed.
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	Supports that the policy only includes regulated energy but finds the energy efficiency benchmarks and renewable energy targets very challenging	LPR-D-165	Noted. The standards required by this policy are consistent with national policy, including the December 2023 Written Ministerial Statement (WMS) on Local Energy Efficiency Standards.
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	Welcomes acknowledgement that it may not always be possible to fully meet the renewable energy provision target on-site but notes the implications of the shortfall being offset have not been consulted on or tested for viability	LPR-D-316	Support noted and welcomed. The policy has been subject to viability testing. Offsetting should be no more onerous than providing mitigation on site.
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	The policy should make clear that where saved allocations have been granted outline permission, future reserved matters applications should not be required to meet these new requirements	LPR-D-225	Future planning applications will need to be assessed against the relevant adopted policies applicable at the time.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	The policy should only relate to major development and should exclude certain forms of building	LPR-D-234	Disagree.
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	The approach is based on energy use and is inconsistent with the approach in the Written Ministerial Statement	LPR-D-309	The standards required by this policy are consistent with national policy, including the December 2023 Written Ministerial Statement (WMS) on Local Energy Efficiency Standards, as well as the interpretation of that WMS outlined in the legal opinion provided by Cornerstone Barristers (February 2024). The standards are also in line with the legal advice on Energy Policy and Building Regulations commissioned by the County Council (available on the Essex County Council website). The WMS 2023 does not explicitly address renewable energy, and so it does not prevent local plans from adopting policies that require on-site renewable energy use. The Planning and Energy Act 2008 grants local authorities the power to require renewable energy use in new developments, as long as it is reasonable and feasible. Furthermore, the National Planning Policy Framework (NPPF) 2023 encourages local authorities to take a proactive approach to climate change, in line with the requirements of the Planning and Compulsory Purchase Act 2004.
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	Considers the policy to be onerous, and much of it Is covered by the Building Regulations and Future Homes Standard	LPR-D-223	The government has released several possible versions of the Building Regulations that are due to come into force in 2025 (the Future Homes Standard/FHS, or Future Buildings Standard/FBS). Analysis has shown that the FHS will not deliver the level of energy efficiency that is necessary for the achievement of the UK's carbon budgets.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD3: Achieving Net Zero Carbon Development, Non-Residential	Suggests rewording to the policy	LPR-D-321 LPR-D-327	The standards required by this policy are consistent with national policy, including the December 2023 Written Ministerial Statement (WMS) on Local Energy Efficiency Standards, as well as the interpretation of that WMS outlined in the legal opinion provided by Cornerstone Barristers (February 2024). The standards are also in line with the legal advice on Energy Policy and Building Regulations commissioned by the County Council (available on the Essex County Council website).
Policy CSD4: Improving Energy and Carbon Performance in Existing Buildings	Support for the retention of buildings should be included and also acknowledgment that adapting historic buildings requires a whole building approach	LPR-D-274 (Historic England)	Noted. The suggested changes are accepted and are included in the list of proposed changes.
Policy CSD4: Improving Energy and Carbon Performance in Existing Buildings	Welcomes the focus on retrofitting and improving the efficiency of existing buildings	LPR-D-302 (Oxfordshire County Council)	Support is noted and welcomed.
Policy CSD4: Improving Energy and Carbon Performance in Existing Buildings	Supports the policy	LPR-D-165 LPR-D-238	Support is noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD4: Improving Energy and Carbon Performance in Existing Buildings	Notes that the policy does not consider to relate to housing but that the greatest improvements would be residential sub-divisions	LPR-D-004	Noted. Residential sub-division cannot be required by local plan policy.
Policy CSD5: Embodied Carbon	Objects as it is unsound and inconsistent with national policy	LPR-D-138 LPR-D-210 LPR-D-227 LPR-D-236	While it is correct that the Planning and Energy Act 2008 does not specifically reference embodied carbon, this does not preclude local planning authorities from acting on this issue. The Act sets a framework for local authorities to adopt policies that promote energy efficiency and carbon reduction, and there is nothing in legislation or national policy that prevents LPAs from addressing embodied emissions as part of a broader response to the climate emergency. While national planning policy and Building Regulations do not currently mandate limits on embodied carbon, CSD 5 is consistent with the direction of travel in both planning and climate policy and reflects acknowledged best practice in the industry. CSD 5 requires developers of major non-residential and residential developments to assess and reduce embodied carbon through a Whole Life Carbon Assessment, using established methodologies such as the RICS Whole Life Carbon Assessment guidance. There is no national regulation yet governing embodied carbon, but CSD 5 is a logical and necessary response to fill that current policy gap and enable the council to act on national climate commitments at the local level. Furthermore, the policy is consistent with the UK's national climate commitments, particularly those set out in the Climate Change Act 2008 and subsequent legislation, which includes ambitious carbon reduction targets for the construction industry. However, the UK's current building regulations primarily focus on operational energy use and do not explicitly address embodied carbon, which is why this local policy initiative is significant. The approach reflects robust evidence gathered by Essex County Council, which tested the feasibility of applying whole-life carbon limits through a detailed viability study and model policy. CSD 5 reflects the broad structure and ambition of that model policy.

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			Moreover, this policy goes beyond the current scope of the Building Regulations, which focus solely on operational energy and do not account for emissions associated with material extraction, processing, transport, construction, maintenance, and end-of-life stages. By incorporating embodied carbon, CSD 5 ensures that the total climate impact of development is addressed, in line with the UK's legally binding net-zero goal.
Policy CSD5: Embodied Carbon	Supports the policy	LPR-D-274 (Historic England) LPR-D-238	Support is noted and welcomed.
Policy CSD5: Embodied Carbon	Supports the policy but considers the targets are challenging	LPR-D-165	Support is noted and welcomed.
Policy CSD5: Embodied Carbon	Objects due to the costs and/or additional burdens placed on developers	LPR-D-221 LPR-D-234 LPR-D-288	Costs have been included in the Viability Assessment for climate change policies references CSD2 (achieving net zero carbon development residential), CSD3 (achieving net zero carbon development non-residential), and CSD5 (embodied carbon).
Policy CSD5: Embodied Carbon	Objects to applying the whole life carbon assessment for all major development as it is not viable for flatted developments	LPR-D-259	Costs have been included in the Viability Assessment for climate change policies references CSD2 (achieving net zero carbon development residential), CSD3 (achieving net zero carbon development non-residential), and CSD5 (embodied carbon).
Policy CSD5: Embodied Carbon	It is not clear in the LPVA that the cost of meeting the proposed embodied carbon requirement has been included in the cost of the development. This should be made clear	LPR-D-138	The costs of the climate change policies have been included within the viability assessment work to support the Plan.
Policy CSD5: Embodied Carbon	Questions the evidence to justify the policy	LPR-D-050	Costs have been included in the Viability Assessment for climate change policies references CSD2 (achieving net zero carbon development residential), CSD3 (achieving net zero carbon development non-residential), and CSD5 (embodied carbon).

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Policy CSD5: Embodied Carbon	This should be achieved through a national approach	LPR- D-136	Noted.
Policy CSD5: Embodied Carbon	Improvements in technical building standards should be delivered through building regulations	LPR-D-211	Noted.
Policy CSD5: Embodied Carbon	The ability to undertake accurate whole life carbon assessment is impinged by the lack of data across building materials	LPR-D-225 LPR-D-227 LPR-D-309	There is now a robust and rapidly growing body of data and established methodologies that make Whole Life Carbon Assessments (WLCAs) an effective and credible tool for minimising embodied carbon in new developments. Whole Life Carbon Assessments are supported by well-recognised industry standards, most notably the RICS Whole Life Carbon Assessment guidance. This provides a consistent framework for assessing emissions across the full life cycle of a building—covering raw material extraction, manufacturing, transport, construction (modules A1–A5), in-use stages (B1–B5), and end-of-life (C1–C4), with optional consideration of benefits beyond the building's life cycle (module D). These modules form the basis of current best practice and are widely used across the industry. While it is recognised that the level of data confidence varies across life cycle stages, particularly for future in-use emissions and end-of-life impacts. Embodied carbon assessments offer a variety of detail on where the carbon quantity of a material is derived from, ranging from specific product data to more generalised material data based on industry assumptions. Therefore, even if a procured material does not have specific data available, data will always be available for the material more generally, which therefore does not prohibit completion of assessments due to a lack of data availability.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD5: Embodied Carbon	These targets cannot be a requirement of development, suggests amendments to the policy	LPR-D-262 LPR-D-263	While it is correct that the Planning and Energy Act 2008 does not specifically reference embodied carbon, this does not preclude local planning authorities from acting on this issue. The Act sets a framework for local authorities to adopt policies that promote energy efficiency and carbon reduction, and there is nothing in legislation or national policy that prevents LPAs from addressing embodied emissions as part of a broader response to the climate emergency. While national planning policy and Building Regulations do not currently mandate limits on embodied carbon, CSD 5 is consistent with the direction of travel in both planning and climate policy and reflects acknowledged best practice in the industry.
Policy CSD5: Embodied Carbon	The target should be the 2025 target and suggests it should be applied to Reserved Matters applications	LPR-D-321	Noted.
Policy CSD5: Embodied Carbon	A whole life carbon assessment should apply to all major developments	LPR-D-341	Noted.
Policy CSD5: Embodied Carbon	Suggests any larger dwellings or house extensions should require special justification. The policy should insist on timber products and lime mortars	LPR-D-004	Such a policy would be contrary to national planning policy. The plan is required to provide for a range of housing to suit the community, including for larger families.
Policy CSD6: Renewable Energy	Supports the policy	LPR-D-274 (Historic England) LPR-D-083 (Banbury Town Council) LPR-D-206 LPR-D-327	Support is noted and welcomed.
Policy CSD6: Renewable Energy	Support the approach to the historic environment.	LPR-D-302 (Oxfordshire County Council)	Support is noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD6: Renewable Energy	Objects to the policy	LPR-D-078 LPR-D-238	Noted.
Policy CSD6: Renewable Energy	Objects to solar-farms encroaching on Green Belt land and local communities	LPR-D-217 (Shipton on Cherwell & Thrupp Parish Council)	Noted. The Policy is required to be in general conformity with national policy.
Policy CSD6: Renewable Energy	Military Aviation and Defence interests should be added to the issues under the policy	LPR-D-069	Noted. A new policy and supporting text for the safeguarding of aerodromes (including military ones) has been added to the list of proposed changes.
Policy CSD6: Renewable Energy	The policy does not allow for a balanced judgement	LPR-D-221 LPR-D-223	Disagree
Policy CSD6: Renewable Energy	The evidence base needs to be updated	LPR-D-210	Disagree. The policy is supported by proportionate evidence.
Policy CSD6: Renewable Energy	Considers the policy should be reconsidered to respond to the Secretary of State's decision on the Botley West Solar Farm	LPR-D-282	The Botley West Solar Farm is an NSIP proposal. No decision has yet been made on this application.
Policy CSD6: Renewable Energy	Renewable energy sites should not be treated as previously developed land and should be restored to greenfield if no longer in use, to also achieve a BNG over 10%	LPR-D-256	Noted.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD7: Sustainable Flood Risk Management	Recommends policy changes regarding wording on functional flood plain and flood zone incompatibility and on flood plain compensation. Suggests updating to the Level 1 SFRA, Sequential Test and Exception Test	LPR-D-312 (Environment Agency)	Agreed. Changes proposed to text. Updates have been prepared to the Level 1 and Level 2 SFRA.
Policy CSD7: Sustainable Flood Risk Management	Schemes to improve river flows and flood plains may affect heritage assets and therefore desk based assessments may be required	LPR-D-302 (Oxfordshire County Council)	These can be sought at a planning application stage. No change.
Policy CSD7: Sustainable Flood Risk Management	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-217 (Shipton on Cherwell & Thrupp Parish Council) LPR-D-041 LPR-D-221	Support is noted and welcomed.
Policy CSD7: Sustainable Flood Risk Management	Supports reference to sewer flooding. The policy should reference that flooding can occur away from the flood plain due to development where off site sewerage is not in place ahead of development	LPR-D-079	Support is noted and welcomed. It is considered that the policies in the Plan address these concerns.
Policy CSD7: Sustainable Flood Risk Management	Generally, supports the policy. Seeks assurance that the sequential test is rigorously applied, consideration is given to cumulative flood impacts, surface water drainage and climate change. Notes concern over Islip's existing drainage issues	LPR-D-161 (Islip Parish Council)	Noted. It is considered that the policies in the Plan address these concerns.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD7: Sustainable Flood Risk Management	Objects as flooding is more likely to occur from a lack of dredging and overdevelopment	LPR-D-078	Flooding from all sources arises from a number of factors. Dredging is not a matter for the Local Plan to address. Development is directed to those areas at least risk of flooding and appropriate mitigation measures sought where necessary.
Policy CSD7: Sustainable Flood Risk Management	Objects due to changes in the 2024 NPPF	LPR-D-258 LPR-D-300 LPR-D-320	Plan has been prepared under 2023 NPPF.
Policy CSD7: Sustainable Flood Risk Management	Objects as development should not be allowed in areas of flood risk	LPR-D-327	Flooding from all sources arises from a number of factors. Development is directed to those areas at least risk of flooding and appropriate mitigation measures sought where necessary.
Policy CSD7: Sustainable Flood Risk Management	Objects due to the failure to address flood problems at Canalside, The Mill and Banbury FC	LPR-D-186	These sites are in known flood risk areas and have been subject to appropriate SFRAs.
Policy CSD7: Sustainable Flood Risk Management	Concern over flooding in Wendlebury which will be under more strain due to new development	LPR-D-219 (Wendlebury Parish Council)	Development is directed to those areas at least risk of flooding and appropriate mitigation measures sought where necessary.
Policy CSD7: Sustainable Flood Risk Management	Raises concern over flooding due to increased development and requests that new developments must factor in mitigation	LPR-D-150	Noted. It is considered that the policies in the Plan address these concerns.
Policy CSD7: Sustainable Flood Risk Management	The policy needs to fully eliminate flood risk	LPR-D-007	Flood risk will not be fully eliminated. The Local Plan can direct development to those areas at least risk of flooding and include policies which help reduce flood risk and provide mitigation where necessary.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD7: Sustainable Flood Risk Management	Suggests changes to wording	LPR-D-221	Disagree that the insertion of the word 'built' before development is necessary.
Policy CSD7: Sustainable Flood Risk Management	Questions if the policy is needed as it is covered in the NPPF	LPR-D-223	Disagree, consider the policy is a useful addition to the Plan.
Policy CSD8: Sustainable Drainage Systems (SuDS)	Supports the policy and suggests amendments	LPR-D-302 (Oxfordshire County Council)	Welcome support. In the event that an archaeological assessment be required, this can be requested at a planning application stage.
Policy CSD8: Sustainable Drainage Systems (SuDS)	Generally supportive but concerns over the implementation of the policy. Seeks assurance that the sequential test is rigorously applied, consideration is given to cumulative flood risk impacts, surface water drainage and climate change. Requests consideration of existing drainage infrastructure capacity, the impact of East-West rail, the need for investment in prevention/mitigation and maintenance requirements. Notes concern over Islip's existing drainage issues	LPR-D-161 (Islip Parish Council)	Disagree, consider the policy can be delivered effectively

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Policy CSD8: Sustainable Drainage Systems (SuDS)	Suggests changing to the wording to include specific reference to protecting groundwater quality and prevent infiltration into SuDs where the depth to groundwater is insufficient to provide attenuation	LPR-D-312 (Environment Agency)	Suggested wording has been accepted.
Policy CSD8: Sustainable Drainage Systems (SuDS)	Objects as SuDS should be considered from the earliest stage and suggests rewording to the policy	LPR-D-221	The policy does refer to SuDS being considered at the earliest stage of site design and this is incumbent upon developers to do so.
Policy CSD8: Sustainable Drainage Systems (SuDS)	It is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewage and requests amendments to the wording	LPR-D-079	It is the developer's responsibility to make provision in consultation with the drainage company to ensure connection.
Policy CSD8: Sustainable Drainage Systems (SuDS)	Measures to prevent flooding in Caulcott should be included	LPR-D-113	Specific flood management schemes would lie outside the remit of the Local Plan, but brought forward by the Environment Agency.
Policy CSD8: Sustainable Drainage Systems (SuDS)	Measures to achieve slow release of surface waters should include renaturalising watercourses	LPR-D-256	Using natural barriers and re-naturalising watercourses is one of a number of measures that can be employed to slow down water flow. it is not considered necessary to add this into the policy.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD9: Water Resources and Wastewater Infrastructure	Supports the policy	LPR-D-290 (West Oxfordshire District Council) LPR-D-083 (Banbury Town Council) LPR-D-041 LPR-D-052 LPR-D-225 LPR-D-238 LPR-D-327	Support is noted and welcomed.
Policy CSD9: Water Resources and Wastewater Infrastructure	How the council will manage levels of growth greater than that in the Thames Water WRMP needs to be understood. All policies need to be future proofed	LPR-D-349 (Environment Agency)	Thames Water and the Environment Agency have been consulted throughout the preparation of the Local Plan including higher levels of growth.
Policy CSD9: Water Resources and Wastewater Infrastructure	Welcomes recognition that Cherwell sits in an area of serious water stress. Suggests inclusion of a requirement for new homes to be designed to a water efficiency standard of 110litres/head/day. Notes there are no mentions of the impact of climate change	LPR-D-312 (Environment Agency)	Noted. Suggested changes have been accepted. Climate change impacts have been well recognised by the Plan.
Policy CSD9: Water Resources and Wastewater Infrastructure	Supports the policy and suggests improvements to the policy due to waste water facilities being a county matter	LPR-D-302 (Oxfordshire County Council)	Welcome support. Policy accords with County Plan and provides useful clarification

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Policy CSD9: Water Resources and Wastewater Infrastructure	The Local Plan should seek to ensure there is adequate water and wastewater infrastructure to serve all new developments and suggests amendments to the policy	LPR-D-079	Consider the policy is sufficiently robust and provides clarity to developers.
Policy CSD9: Water Resources and Wastewater Infrastructure	It is for the council and water company to determine the water and wastewater capacity, not the housebuilder. Recommends paragraphs in the policy are deleted	LPR-D-138 LPR-D-211 LPR-D-263	Agree that it is not for the developer to determine water and wastewater capacity. Consider the policy is sufficiently robust and provides clarity to developers.
Policy CSD9: Water Resources and Wastewater Infrastructure	There is insufficient capacity at the existing wastewater treatment works to process the wastewater from the proposed houses	LPR-D-157 LPR-D-257	The relevant water companies and Environment Agency have been aware of the level of growth proposed for some time and their upgrades should be prioritised so as not to prevent development taking place.
Policy CSD9: Water Resources and Wastewater Infrastructure	Concern over the water utility infrastructure in Wendlebury	LPR-D-219 (Wendlebury Parish Council)	The relevant water companies and Environment Agency have been aware of the level of growth proposed for some time and their upgrades should be prioritised so as not to prevent development taking place.
Policy CSD9: Water Resources and Wastewater Infrastructure	The policy is not sufficient to ensure demands are met and flood risk is minimised	LPR-D-325	Disagree, consider this and other policies, and supporting evidence all contribute to minimising flood risk
Policy CSD9: Water Resources and Wastewater Infrastructure	The intention to prevent development coming forward until water infrastructure has been put in place is unsound	LPR-D-316	Disagree that this is a soundness issue. Getting infrastructure in early is an important consideration.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD10: Protection of the Oxford Meadows SAC	Supports the policy	LPR-D-238 (BBOWT)	Support noted and welcomed.
Policy CSD10: Protection of the Oxford Meadows SAC	The policy makes no mention of the possibility of SANG land being provided as a result of housing development in areas which could impact the SAC	LPR-D-256	Query noted. Majority of development within Cherwell will be at a distance greater than 5km from the site. Five kilometres is the general figure utilised for inland SACs to define the area in which it is likely for significant numbers of recreational visits by car. The CLPR HRA identifies no adverse effect on the integrity of any European sites either alone or in combination with other plans and projects.
Policy CSD10: Protection of the Oxford Meadows SAC	Suggests addition of mitigation measures on fluvial flood risk.	LPR-D-312 (Environment Agency)	Agree. Changes included in the list of proposed changes to the Plan.
Policy CSD10: Protection of the Oxford Meadows SAC	Suggest changes to the policy requirement to demonstrate pre-application engagement with relevant statutory organisations.	LPR-D-210 LPR-D-223	Agree. Change included in the list of proposed changes to the Plan.
Policy CSD10: Protection of the Oxford Meadows SAC	The policy should be tightened to reflect that only some development close to or likely to have an impact on the meadows should be caught	LPR-D-223	Agree. Change included in the list of proposed changes to the Plan.
Policy CSD10: Protection of the Oxford Meadows SAC	Supports the policy, suggests improvements regarding water quality and quantity and benchmarks for run off rates.	LPR-D-302 (Oxfordshire County Council)	Disagree. The Plan should be read as a whole. These matters are covered by Policy CDS9. Policy CSD10 alongside supporting HRA addresses hydrological impact pathways related to the Oxford Meadows SAC.

LOCAL PLAN PROPOSED SUBMISSION: Meeting the Challenge of Climate Change and Ensuring Sustainable Development (CHAPTER 3: Theme 1)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Theme1: Meeting the Challenge of Climate Change and Ensuring Sustainable Development	The plan should include a policy on nature conservation and watercourses and makes recommendations regarding additional wording.	LPR-D-312 (Environment Agency)	Agreed. CLPR nature conservation and biodiversity policies CSD 11 and CSD 13 encompass watercourses and make specific reference to Green and Blue Infrastructure. A new policy on Nature Conservation and Watercourses is included in the list of proposed changes to the Plan to address matters including buffer zones and futureproofing in relation to emerging Oxfordshire's Local Nature Recovery Strategy regarding watercourses.
Policy CSD11: Protection and Enhancement of Biodiversity	Welcome the plan's inclusion of many references to the importance of watercourses and inclusion of some of the ways that they might be positively affected by development.	LPR-D-312 (Environment Agency)	Support noted and welcomed.
Policy CSD11: Protection and Enhancement of Biodiversity	Schemes for the restoration or enhancement of habitats may affect heritage and archaeological assets and therefore archaeological desk-based assessments may be required. Notes that bird bat provision may not be the most appropriate in all situations	LPR-D-302 (Oxfordshire County Council)	Noted. The Plan should be read as a whole. The planning balance between heritage and ecology policies will be applied at decision making stage.
Policy CSD11: Protection and Enhancement of Biodiversity	Supports the policy	LPR-D-041 LPR-D-052 LPR-D-083 (Banbury Town Council) LPR-D-161 LPR-D-165 LPR-D-165 LPR-D-238 LPR-D-262 LPR-D-263	Support noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD11: Protection and Enhancement of Biodiversity	Development that threatens areas of land that have a rich biodiversity from suitable Nature Recovery zones should not be supported. The potential enlarged Nature Recovery zone should be recognised and given status for protection purposes in the Local Plan. Biodiversity should be protected from fragmentation caused by infrastructure such as new roads.	LPR-D-256	Noted. Policy CSD 11 addresses all these comments including biodiversity fragmentation. Oxfordshire's Local Nature Recovery Strategy is under preparation. In March 2025, Oxfordshire and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation. This is listed in proposed changes to the Plan.
Policy CSD11: Protection and Enhancement of Biodiversity	Supports the clear protection given to ancient woodland. Considers that the policy is not consistent with national policy as it needs explicit reference to ancient and veteran trees. Recommends adding suitable wording on the requirement for buffers	LPR-D-082 (Woodland Trust	The policy refers to irreplaceable habitats which includes ancient and veteran trees.
Policy CSD11: Protection and Enhancement of Biodiversity	Suggest alteration to the policy phrasing so damaging certain sites/habitats/species would only be permitted if impacts can be fully mitigated or compensated for.	LPR-D-035	It is considered that the policy is in accordance with national policy.
Policy CSD11: Protection and Enhancement of Biodiversity	Suggests 'all development proposals will be expected to incorporate features to enhance biodiversity' will not always be possible/appropriate. Suggests changing the wording to include 'where appropriate'	LPR-D-094	Disagree. There is a statutory requirement for all development to achieve at least 10% biodiversity net gain.
Policy CSD11: Protection and Enhancement of Biodiversity	Welcomes the majority of the policy but notes some elements are not clearly drafter or unduly replicate national policies.	LPR-D-316	Support noted but consider that the policies are clear.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD11: Protection and Enhancement of Biodiversity	Restricts/hinders significantly the implementation of the Bicester Motion plan and is at odds with the established land uses.	LPR-D-265	Disagree. Permitted development is outside the scope of Policy CSD 11 and will be delivered in accordance with the agreed S106 and conditions attached to the permission.
Policy CSD11: Protection and Enhancement of Biodiversity	Suggests there should be explicit references to swift bricks in the policy	LPR-D-088 LPR-D-184 LPR-D-192	Disagree. The policy addresses appropriately the integration bird and bat provision within development proposals.
Policy CSD11: Protection and Enhancement of Biodiversity	Questions the viability of implementing the policy	LPR-D-050	Noted. The Plan as a whole and plan policies have been viability tested.
Policy CSD11: Protection and Enhancement of Biodiversity	Supports the policy but highlights that some forms of environmental improvements/enhancements may not be compatible with aviation safety	LPR-D-069 (DIO/MoD)	Noted. The Plan should be read as a whole. The planning balance between environmental objectives and aviation safety will be applied at decision making stage.
Policy CSD11: Protection and Enhancement of Biodiversity	Considers the policy to be unsound, unjustified and inconsistent with national policy. Suggests changing of point iv to be changed from 'fully mitigated' to 'adequately mitigated', or as a last resort compensated for	LPR-D-309	Disagree. The policy is consistent with national policy.
Policy CSD11: Protection and Enhancement of Biodiversity	Objects as development cannot protect/enhance protected sites whilst also developing them	LPR-D-157	Disagree. The policy is consistent with national policy.
Policy CSD11: Protection and Enhancement of Biodiversity	Objects to land at Buckingham Road, Bicester being designated as a District Wildlife Site	LPR-D-079	Disagree. District Wildlife Sites in Cherwell were identified by TVERC between 2013-15 following a robust assessment of the sites' importance for wildlife in Cherwell.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD11: Protection and Enhancement of Biodiversity	The town is not big enough for development and there is insufficient infrastructure	LPR-D-187	Noted. Unclear which town is being referred to in relation to this District wide policy. The Plan should be read as a whole, including Policy SP1 on settlement hierarchy. Policy SP1 has the objective of directing development to the most sustainable locations. It is considered that the Plan strikes an appropriate balance based on evidence including the consideration of infrastructure to support new development.
Policy CSD11: Protection and Enhancement of Biodiversity	There is not a clear distinction between the sites considered to be of importance at differing scales. Terminology used is poor and there is a need for clarification. Mitigation hierarchy and BNG should not be in the policy, and rather covered by CSD12	LPR-D-210	Disagree. Policies are complementary in some respects but the specific requirements for Biodiversity Net Gain are more clearly expressed within a stand-alone policy.
Policy CSD11: Protection and Enhancement of Biodiversity	The policy is unnecessary as it is covered by the Wildlife and Countryside Act	LPR-D-221	Disagree. Local Plans are required to set out policies for the conservation and enhancement of the natural, built and historic environment.
Policy CSD11: Protection and Enhancement of Biodiversity	Concern over the requirement to provide integrated bird/bat provision at a minimum of one per new dwelling	LPR-D-225 LPR-D-321	Noted. The planning balance between environmental requirements and viability of proposals can be applied at decision making stage if these arise and are justified and following relevant and proportionate habitats and species supporting the planning application.
Policy CSD11: Protection and Enhancement of Biodiversity	Queries why the LNRS is not mentioned in the plan	LPR-D-291	Disagree. LNRS is addressed in the Plan. Oxfordshire's Local Nature Recovery Strategy is under preparation. In March 2025, OXON and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Policy CSD12: Biodiversity Net Gain	Supports the policy	LPR-D-290 (West Oxfordshire District Council) LPR-D-069 LPR-D-082 LPR-D-083	Support noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
		(Banbury Town Council) LPR-D-165 LPR-D-217 (Shipton on Cherwell & Thrupp Parish Council)	
Policy CSD12: Biodiversity Net Gain	Welcomes the majority of the policy but objects to the 20% BNG requirement, and considers it to be unachievable	LPR-D-316 LPR-D-266	Partial support noted and welcomed. The policy has been subject to viability appraisal. The scale and nature of strategic sites offer greater potential for habitat creation, enhancement, or restoration integrated within the site proposal. The planning balance between environmental requirements and viability of proposals can be applied at decision making stage if these arise and are justified.
Policy CSD12: Biodiversity Net Gain	Objects to the policy and lack of supporting evidence for it. Suggests a 10%+ BNG policy	LPR-D-210	Disagree. This ambition is already embedded in the policy with the 10% requirement expressed as a 'minimum' requirement and 20% required in strategic sites and sites within the Core and Recovery zones.
Policy CSD12: Biodiversity Net Gain	Restricts/hinders significantly the implementation of the Bicester Motion plan and is at odds with the established land uses.	LPR-D-265	Disagree. Permitted development is outside the scope of Policy CSD 12 and will be delivered in accordance with the agreed S106 and conditions attached to the permission.
Policy CSD12: Biodiversity Net Gain	Note that the LNRS is still in draft form. Query whether strategic is the same as major.	LPR_D_8[illegible]8	Oxfordshire's Local Nature Recovery Strategy is under preparation. In March 2025, the Oxfordshire authorities and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation. Policy CSD12 makes clear these are the strategic allocations in this Plan. Amendments to Appendix 11 making clearer strategic and non-strategic policies (including sites) are included in the list of proposed changes to the Plan.

LOCAL PLAN PROPOSED SUBMISSION: Meeting the Challenge of Climate Change and Ensuring Sustainable Development (CHAPTER 3: Theme 1)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD12: Biodiversity Net Gain	Objects to the policy due to lack of justification for exceeding national 10% requirement, inconsistency with PPG, and viability concerns. Unnecessary, as already covered by the Wildlife and Countryside Act,	LPR_D_79❹ LPR_D_876 LPR_D_870 LPR_D_887 LPR_D_8❶❹ LPR_D_8❷8 LPR_D_8❷9 LPR_D_8❷❷ LPR_D_8❸❹ LPR_D_8❹8 LPR_D_8❹❶ LPR_D_8❹❹ LPR_D_966 LPR_D_967 LPR_D_96❺ LPR_D_986	Disagree. The PPG is clear on the Government's objective to achieve at least 10% BNG relative to pre-development. It also notes that plan makers can complement the statutory framework having regard to Local Nature Recovery Strategies. The scale and nature of strategic sites offer greater potential for habitat creation, enhancement, or restoration integrated within the site proposal. The policy has been subject to viability appraisal. The planning balance between environmental requirements and viability of proposals can be applied at decision making stage if these arise and are justified.
Policy CSD12: Biodiversity Net Gain	Objects to the policy and considers it to be unsound and unjustified, including the requirement for 20% BNG.	LPR-D-138 LPR-D-278 LPR-D-282	Disagree. The scale and nature of strategic sites offer greater potential for habitat creation, enhancement, or restoration integrated within the site proposal. The policy has been subject to viability appraisal. The planning balance between environmental requirements and viability of proposals can be applied at decision making stage if these arise and are justified.
Policy CSD12: Biodiversity Net Gain	Supports the requirement for long term ecological enhancement to deliver BNG. Recommends the policy encourages a BNG greater than 10% with ambition to achieve 20%	LPR-D-302 (Oxfordshire County Council)	Disagree. This ambition is already embedded in the policy with the 10% requirement expressed as a 'minimum' requirement and 20% required in strategic sites and sites within the Core and Recovery zones.
Policy CSD12: Biodiversity Net Gain	Considers the policy should not require more than the statutory 10% BNG	LPR-D-226 LPR-D-227 LPR-D-237 LPR-D-165	Disagree. The policy has been subject to viability appraisal. The scale and nature of strategic sites offer greater potential for habitat creation, enhancement, or restoration integrated within the site proposal.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD12: Biodiversity Net Gain	The 20% risks viability issues	LPR-D-234	Disagree. The policy has been subject to viability appraisal. The planning balance between environmental requirements and viability of proposals can be applied at decision making stage if these arise and are justified.
Policy CSD12: Biodiversity Net Gain	The policies maps should be much clearer to identify the different zones, so it is clear what level of BNG is required in different areas	LPR-D-236	Oxfordshire's Local Nature Recovery Strategy is under preparation. In March 2025, the Oxfordshire authorities and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Policy CSD12: Biodiversity Net Gain	Recommends a reporting system is established to track progress and hold developers accountable. They should be monitored for at least 30 years post development	LPR-D-217 (Shipton on Cherwell & Thrupp Parish Council)	Noted. Local Plan annual monitoring report will progress against this policy. Oxfordshire County Council is the Responsible Authority for the emerging Local Nature Recovery Strategy and work closely together with Oxfordshire Local Nature Partnership and the Oxfordshire authorities. A monitoring framework is expected to be established as the Strategy progresses.
Policy CSD12: Biodiversity Net Gain	Queries if 20% BNG has been evidenced	LPR-D-223 LPR-D-321	Noted. The policy has been subject to viability appraisal.
Policy CSD12: Biodiversity Net Gain	20% BNG should be applied across the entire district	LPR-D-100 LPR-D-238 LPR-D-257	Disagree. The policy sets out requirements informed by viability appraisal. The 10% is expressed as a 'minimum' requirement and 20% required in strategic sites and sites within the Core and Recovery zones.
Policy CSD12: Biodiversity Net Gain	20% BNG should be applied across the whole of the Cotswold National Landscape Area within Cherwell	LPR-D-195	The rare and nationally important habitats in the Cotswolds National Landscape Area are acknowledged and their protection and enhancement addressed in Policies CSD11 ‘protection and Enhancement of Biodiversity’ and Policy COM 10 Protection and Enhancement of the Landscape. Only a small portion of the Cotswolds National Landscape falls within the Cherwell district, specifically around the village of Epwell (a Category A village). If development falls within the Nature Recovery Network Core or Recovery Zones, 20% BNG will be sought. Please note that Oxfordshire's Local Nature Recovery Strategy is under preparation. In March 2025, Oxfordshire County Council and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD12: Biodiversity Net Gain	Notes that the policy still refers to Nature Recovery Network Core and Recovery zones and does not fully align with national legislation.	LPR-D-165	Oxfordshire's Local Nature Recovery Strategy is under preparation. In March 2025, Oxfordshire County Council and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Policy CSD12: Biodiversity Net Gain	Considers it unjustified to propose a policy which seeks at least 20% BNG from the strategic allocations	LPR-D-136 LPR-D-237 LPR-D-321	Disagree. The policy has been subjected to viability appraisal. The scale and nature of strategic sites offer greater potential for habitat creation, enhancement or restoration integrated within the site's proposal.
Policy CSD12: Biodiversity Net Gain	Some forms of environmental improvement/enhancement may not be compatible with aviation safety	LPR-D-069 (DIO/MoD)	Noted. The Plan should be read as a whole. The planning balance between environmental objectives and aviation safety will be applied at decision making stage.
Policy CSD12: Biodiversity Net Gain	Considers the Plan not to be in compliance with NPPF 2024 conservation and natural environment principles and requests a specific map of what pathways the council have designated green lanes or as part of wider ecological networks	LPR-D-043	Oxfordshire's Local Nature Recovery Strategy is under preparation, including mapping. In March 2025, OXON and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Policy CSD12: Biodiversity Net Gain	Notes repetition between CSD12 and CSD14 and recommends they are merged	LPR-D-165 LPR-D-214	Disagree. Policies are complementary in some respects but the specific requirements for Biodiversity Net Gain are more clearly expressed within a stand-alone policy.
Policy CSD13: Conservation Target Areas	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-238 LPR-D-141	Support noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD13: Conservation Target Areas	Suggests the CTA's are listed in the policy for clarity.	LPR-D-282	Disagree. Conservation Target Areas are identified in the Policies Map and Appendix 8 of the Plan.
Policy CSD13: Conservation Target Areas	Requests for the boundaries of designated conservation areas to be reviewed and in some cases extended	LPR-D-149	The designation and extension of conservation areas is undertaken outside the local plan.
Policy CSD13: Conservation Target Areas	Notes that guidance from the government is expected imminently on the LNRS which may supersede CTA's.	LPR-D-302 (Oxfordshire County Council)	Noted. CTAs form an integral part of the emerging Local Nature Recovery Strategy (LNRS). In March 2025, OXON and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Policy CSD13: Conservation Target Areas	Notes the Gavray Drive Local Wildlife Site is being deteriorated and 'biodiversity restoration' cannot be achieved, therefore suggests amendments to wording to include the benefit of enabling development.	LPR-D-141	Disagree. The planning balance between nature conservation and development needs will be applied at decision making stage when enabling development could be considered.
Policy CSD13: Conservation Target Areas	The policy lacks mention as to how contributions in CTAs will count to a developments BNG %	LPR-D-165	Noted. BNG is addressed in Policy CSD12. CTAs form an integral part of the emerging Local Nature Recovery Strategy (LNRS). In March 2025, OXON and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Policy CSD13: Conservation Target Areas	Objects to the inclusion of land north and south of Milton Road, Bloxham as part of the CTA	LPR-D-288	Oxfordshire's Local Nature Partnership in collaboration with the local authorities and other partners is responsible for the designation of nature-enhancement opportunity areas such as CTAs which form an integral part of the draft Local Nature Recovery Strategy (LNRS). Consultation on the LNRS took place in December 2024.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD14: Natural Capital and Ecosystem Services	Welcomes the policy and suggests supporting text includes a definition of 'environmental net gain' and further details on the requirements.	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. Supporting paragraphs 3.95 and 3.96 cross refers to the relevant evidence report and resource to support the policy's implementation. Reference to Oxfordshire's Nature Finance Strategy and emerging delivery framework for natural capital investment in Oxfordshire and glossary definition of environmental net gain are included in the list of proposed changes to the Plan.
Policy CSD14: Natural Capital and Ecosystem Services	Supports the policy	LPR-D-161 (Islip Parish Council)	Noted and welcomed.
Policy CSD14: Natural Capital and Ecosystem Services	Supports the policy as long as it does not undermine biodiversity policies. Notes concern about the natural capital approach and that more information is required in relation to this	LPR-D-238	Noted. Cherwell's Natural Capital Assets Report (2021) provides further information. The Policy reflects the aims of the Oxfordshire Local Nature Partnership (OLNP) Nature Finance Strategy. Reference to Oxfordshire's Nature Finance Strategy and emerging delivery framework for natural capital investment in Oxfordshire within the policy supporting text is included in the list of proposed changes to the Plan.
Policy CSD14: Natural Capital and Ecosystem Services	Supports the policy aims.	LPR-D-165	Noted and welcomed.
Policy CSD14: Natural Capital and Ecosystem Services	Objects to the policy and considers it should be removed from the plan	LPR-D-288	Disagree. The policy reflects the aims of the Oxfordshire Local Nature Partnership Nature Finance Strategy and is consistent with the requirement in the NPPF for policies to recognise the wider benefits from natural capital and ecosystem services.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD14: Natural Capital and Ecosystem Services	The requirement for a natural capital assessment appears onerous	LPR-D-165 LPR-D-221 LPR-D-282	Disagree. The policy reflects the aims of the Oxfordshire Local Nature Partnership Nature Finance Strategy and is consistent with the requirement in the NPPF for policies to recognise the wider benefits from natural capital and ecosystem services.
Policy CSD14: Natural Capital and Ecosystem Services	Finds the policy poorly worded, lacking clarity and not supported by the NPPF	LPR-D-221	Disagree. The policy reflects the aims of the Oxfordshire Local Nature Partnership Nature Finance Strategy and is consistent with the requirement in the NPPF for policies to recognise the wider benefits from natural capital and ecosystem services.
Policy CSD14: Natural Capital and Ecosystem Services	The natural capital assessment requirement appears onerous. The policy requires more information which would add little to the process beyond what is already required. The Natural Capital Map needs refining	LPR-D-282 LPR-D-234 LPR-D-316	Noted. Reference to Oxfordshire's Nature Finance Strategy and emerging delivery framework for natural capital investment in Oxfordshire is included in the list of proposed changes to the Plan.
Policy CSD15: Green and Blue Infrastructure	Supports the policy	LPR-D-274 (Historic England) LPR-D-052 LPR-D-082 LPR-D-083 (Banbury Town Council) LPR-D-126 LPR-D-165 LPR-D-271 (Kirtlington Parish Council)	Support noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD15: Green and Blue Infrastructure	Supports the policy and suggests cross reference to Natural England's Green Infrastructure Framework, following the principle of right tree in the right place. GBI management and monitoring is essential.	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. Cherwell's GBI Strategy builds on Natural England's GI Framework and provides specific guidance for tree planting as part of GBI principles for incorporation into new development. CLPR Appendix 3 sets out the LP monitoring framework with indicators and targets for each policy.
Policy CSD15: Green and Blue Infrastructure	Suggests amendments to the wording of the policy requirement development to demonstrate how it affects off-site G&BI, protection and enhancement.	LPR-D-065 (the Canal and River Trust)	Disagree. Protection and enhancement of G&B off site is clear in the policy. The requirements in list form are intended to ensure the inclusion of 'meaningful and integrated' G&BI as part of the design of development proposals.
Policy CSD15: Green and Blue Infrastructure	Supports the policy and considers it to be sufficiently flexible but suggests amending the wording in relation to BNG.	LPR-D-165	Support noted and welcomed. The amendment is included in the list of proposed changes to the Plan.
Policy CSD15: Green and Blue Infrastructure	The policy is not effective in its current form and emphasis is needed about the quality of greenspace and its benefits for health. Recommends additions to the next	LPR-D-238	Disagree. Other policies in the Plan address quality of green space and its health value.
Policy CSD15: Green and Blue Infrastructure	The first paragraph appears onerous and recommends criteria viii is deleted	LPR-D-282	Disagree. Protection of G&B infrastructure is consistent with NPPF requirements for strategic policies to make sufficient provision for green infrastructure and with NPPF nature conservation objectives. Criteria viii is consistent with NPPF objective to promote positive uses of the Green Belt.
Policy CSD15: Green and Blue Infrastructure	Objects to the vague definition- 'meaningful GBI' and notes that offsite BNG provision would more likely be required on the majority of sites	LPR-D-309	Disagree. List of criteria is aimed at ensuring 'meaningful provision'. Note on BNG noted.
Policy CSD15: Green and Blue Infrastructure	Blue infrastructure has no protection and is not properly mapped, requests a map showing connections between	LPR-D-043	Green and Blue Infrastructure Strategy is included in Policy CSD 11 'Protection and Enhancement of Biodiversity'.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
	green spaces and those suitable for human walkers		The Green and Blue Infrastructure Strategy scope and content is appropriate to support the objectives and policies in the CLPR. The strategy is supported by an online interactive map. Oxfordshire's Local Nature Recovery Strategy is under preparation, including mapping. In March 2025, OXON and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Policy CSD16: Air Quality	Supports the policy, notes continuous measurement of air quality, pollution and noise needs to be considered	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed.
Policy CSD16: Air Quality	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-041 LPR-D-164	The comments are noted. Developers must meet the requirements of national and local policies which include the provision of sustainable transport measures and active travel e.g. public transport, cycling and walking.
Policy CSD16: Air Quality	Objects to the requirement of all development proposals being air quality neutral	LPR-D-236 LPR-D-240 (Fritwell Parish Council)	The comments are noted.
Policy CSD16: Air Quality	Suggests alterations to wording	LPR-D-257	The comments are noted. We do not agree to change air quality neutral to improve air quality as this lessens the standard that the Council are seeking to achieve.
Policy CSD16: Air Quality	The first sentence (s) are not consistent with the rest of the policy, recommends deletion	LPR-D-221 LPR-D-321	The comments are noted.
Policy CSD16: Air Quality	Queries the wording of 'air quality neutral' and notes all development proposals should be designed to improve air quality	LPR-D-100	The comments are noted.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD16: Air Quality	Concern about the level of air and noise pollution in Wendlebury and suggests implementation of low-emission **vehicle** zones and greater investment in public transport and green infrastructure	LPR-D-219 (Wendlebury Parish Council)	National and local policy supports the provision of public transport and the provision of green infrastructure including its facilitation for walking and cycling. Oxfordshire County Council are the local highways authority, and they have set out their policies and investment priorities in their Local Transport and Connectivity Plan. Both Oxfordshire County Council and Cherwell District Council support the provision and use of public transport and active travel.
Policy CSD16: Air Quality	It is unclear how requirements will be demonstrated and assessed by the LPA when an application is made, a proportionate approach should be taken	LPR-D-234	The comments are noted. The relevant documentation is already referenced within the policy. This relates to the pre app and planning application stage and will also be subject to the Council's validation checklist. As per best practice a prospective developer will need to undertake pre application discussions with the Council's Development Management Team and Environmental Protection Team. Applicants will need to undertake their own transport modelling assessment which will generate the traffic data which will be required to undertake an air quality assessment. In terms of mitigation, any required planning conditions and planning obligations will have to meet the legislative requirements. Proposed changes will be put forward to reference the requirement for pre application discussions with the Council and a reference will be added to obtaining the latest air quality monitoring data from the council.
Policy CSD17: Pollution and Noise	Supports the policy, notes continuous measurement of air quality, pollution and noise needs to be considered	LPR-D-302 (Oxfordshire County Council)	Support is noted and welcomed.
Policy CSD17: Pollution and Noise	Support the policy	LPR-D-083 (Banbury Town Council)	Support is noted and welcomed.
Policy CSD17: Pollution and Noise	Supported in principle. Clarity is needed regarding potential odour impacts from sewage works in relation to development proposals nearby.	LPR-D-079	The comments are noted. Minor modifications are proposed for improvement.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
	Recommends additional text in the policy		
Policy CSD17: Pollution and Noise	Objects as the policy does not define 'unacceptable risk' regarding risks to public health and safety, the environment, general amenity or existing uses	LPR-D-221	The comments are noted.
Policy CSD17: Pollution and Noise	The policy does not properly incorporate the agent of change principles or guidance	LPR-D-234	The comments are noted. The Agent of Change principle means whoever introduced a change is responsible for managing any negative impacts on existing uses or activities in the area. The developer would be responsible for minimising and mitigating the impact of any development and this would be controlled via planning conditions and may also include a legal agreement.
Policy CSD18: Light Pollution	Supports the policy. Notes continuous measurement of air quality, pollution and noise needs to be considered. Suggests improvements to the policy	LPR-D-302 (Oxfordshire County Council)	Support is noted and welcomed. The policy is proposed to be modified.
Policy CSD18: Light Pollution	Support the policy	LPR-D-083 (Banbury Town Council) LPR-D-238 LPR-D-256	Support is noted and welcomed.
Policy CSD18: Light Pollution	Objects as the text does not recognise the important benefits to people from sports lighting or the importance of ensuring safe active travel routes. Additional text should be added to address this	LPR-D-191	Support is noted and welcomed. The policy is proposed to be amended in the form of proposed modifications.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy CSD18: Light Pollution	Objects as light pollution is mentioned in CSD17 and therefore CSD18 should be deleted	LPR-D-221	The comments are noted.
Policy CSD18: Light Pollution	Would like this policy imposed at Heyford Park	LPR-D-113	The comments are noted.
Policy CSD18: Light Pollution	Suggests tree planting to mitigate light pollution from new housing and roads	LPR-D-187	The comments are noted. Landscaping can be used but it only provides coverage during the later spring and summer months. Landscaping can take years to get established and to reach a height that would reduce, and block light pollution and landscape mitigation is less during autumn and winter months.
Policy CSD18: Light Pollution	Seeks clarification that the policy refers to private land and not to the detriment of safety of guests. Notes that Oxfordshire County Council require lighting to adoptable standards, differing from this policy	LPR-D-222	The comments are noted. The policy relates to development and any land. Oxfordshire County Council are the Local Highways Authority, and they would need to be consulted on lighting proposals which impacted the highways and they have legislation and adoptive standards which they need to follow.
Policy CSD18: Light Pollution	Support the intention of the policy. Needs to demonstrate minimum light used. Seeks flexibility to ensure the most appropriate lighting for the proposed uses can be brought forward. Needs to ensure safe communities.	LPR-D-225	The comments are noted. The policy is proposed to be amended.
Policy CSD19: Soils, Contaminated Land and Stability	Recommends the policy is amended to add reference of risks to groundwater and surface waters	LPR-D-349 (Environment Agency) LPR-D-312 (Environment Agency)	It is not considered necessary to refer to all types of flooding in this policy.

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Policy CSD19: Soils, Contaminated Land and Stability	Support the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy CSD19: Soils, Contaminated Land and Stability	Concern regarding reference to viability and recommends the policy is amended to remove these criteria	LPR-D-203	There may be instances where development viability is a factor in the redevelopment of land, linked to its use. The inclusion of this text provides flexibility.
Policy CSD20: Hazardous Substances	Recommends the policy is amended to add reference of risks to groundwater and surface waters	LPR-D-349 (Environment Agency) LPR-D-312 (Environment Agency)	It is not considered necessary to refer to all types of flooding in this policy.
Policy CSD21: Waste Collection and Recycling	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-165	Support noted and welcomed.
Policy CSD21: Waste Collection and Recycling	There should be more flexibility in the wording of the policy	LPR-D-165	Consider the policy is sufficiently flexible.

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Policy CSD22: Sustainable Transport and Connectivity Improvements	Supports the policy and recommends the movement hierarchy is adopted for all development	LPR-D-200 (National Highways)	Support noted and welcomed.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Supports the policy and suggests improvements to make the wording clearer and stronger. Suggests liveable and healthy streets should be referred to and the provision of EV charging should be required in line with the Oxfordshire Electric Vehicles Strategy	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. Suggested improvements are not considered necessary; the Plan should be read as a whole. Policy CSD 22 is unambiguous and supportive of the Plan's vision and objectives. Policy CSD2 alongside Policy CSD23 on Assessing Transport Impact are clear on what is required from development while maintaining flexibility and being reflective of the Local Transport Plan and NPPF. Policies in Theme 3 'Building Healthy and Sustainable Communities' address the broader aim of liveable neighbourhoods including residential space standards, well designed places, active travel, healthy communities, open space sport and recreation, services and facilities. Policy COM 14 requires new development to adopt 20 minute neighbourhood principles and those set out in the Manual for Streets and Streets for a Healthy Life. Part S of Building Regulations on Electric vehicles Infrastructure is now in place. CDC will work with OCC to ensure that emerging Oxfordshire Movement and Place Strategies for Cherwell's areas reflect these principles.

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Policy CSD22: Sustainable Transport and Connectivity Improvements	Supports the policy	LPR-D-041 LPR-D-052 LPR-D-083 (Banbury Town Council) LPR-D-223 LPR-D-262 LPR-D-263 LPR-D-271 (Kirtlington Parish Council) LPR-D-298	Support noted and welcomed.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Generally, supports the policy but notes there are some issues regarding trip rates and the vehicles category	LPR-D-321	Support noted and welcomed. Modelling evidence has been reviewed in response to Regulation 19 consultation in consultation with National Highways.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Concern regarding new sites and the impact on the A41 corridor including increased traffic levels from Bicester towards Aylesbury. Requests a more strategic technical study of the impacts of development on the A41 corridor.	LPR-D-108 (Buckinghamshire Council)	Noted. OCC commissioned the A41 Corridor Study, July 2022 and are progressing a Corridor Travel Plan for the A41 and a Movement and Place Strategy (MAPS) for Bicester. Transport evidence supporting the CLPR include the Transport modelling and Bicester Transport Topic Papers published for consultation in December 2024. A number of measures on the A41 have already been delivered including Ploughley Road/A41 junction improvements and the widening of the A41 (Oxford Road corridor). The role of the proposed South East Peripheral Road and measures on the Eastern Peripheral Corridor is to reduce vehicular movements along the A41 and wider area. We will continue to work with Buckinghamshire Council as the CLPR progresses to adoption and during the preparation of OCC's emerging corridor strategies and Bicester MAPS.

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Policy CSD22: Sustainable Transport and Connectivity Improvements	Supports the aims of the policy but concerned that the allocation southeast of Woodstock does not align with them and will likely lead to strong car reliance	LPR-D-290 (West Oxfordshire District Council)	Disagree. The aim of the policy is to ensure that transport improvements are secured, that the CLPR and Local Transport Plan transport hierarchy is reflected in development proposals address the CLPR and Local Transport Plan and that strategic development provides direct bus access. Land South East of Woodstock is located within walking distance to primary and secondary schools, within cycling distance to a major employment area and served by direct bus services to Kidlington and Oxford. A Park and Ride is also planned opposite the site.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Objects to the part of the policy that expects all strategic developments to provide direct bus access.	LPR-D-221	Disagree. CLPR allocates strategic development in locations where development is or can be made accessible by means other than the private car. The requirement is justified and deliverable.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Objects to the use of the Local Transport Connectivity Plan as a reference	LPR-D-316	Disagree. Cherwell operates in a two-tier local government structure. It is appropriate that the CLPR supports and reflects Oxfordshire's Local Transport and Connectivity Plan.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Does not consider the policy to be consistent with national policy, seeks amendments including removal of reference to a sustainable transport hierarchy	LPR-D-050	Cherwell operates in a two-tier local government structure. The CLPR supports and reflects Oxfordshire's Local Transport and Connectivity Plan and its transport area strategies.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Suggest amendments to the policy including adding reference to car sharing to criterion v, change 'rapid' to 'appropriate' in the text below the criteria, and make reference to OCC Parking Standards. Wishes to see exception for viability to be added to the policy	LPR-D-222	Noted Agree with the addition of 'car sharing' to criteria v. It is included in the list of proposed changes to the Plan. The rest of the suggestions are considered unnecessary. The operational viability of charging points at an specific location is a matter best addressed through the planning application process. Reference to OCC parking standards already covered in the policy.

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Policy CSD22: Sustainable Transport and Connectivity Improvements	Local Plan identifies many potentially beneficial improvements, for connectivity for those in rural areas, enabling reduction of private car use, improved air quality and better sustainability, but what is less clear is the role that CDC will play in how these are to be achieved.	LPR-D-271 (Kirtlington Parish Council)	Noted. Cherwell operates in a two-tier local government structure. The CLPR supports and reflects Oxfordshire's Local Transport and Connectivity Plan and its transport area strategies. Development allocations in the CLPR are proposed in areas that are accessible or can be made accessible by means other than the private car. The transport evidence supporting the CLPR has been prepared jointly with Oxfordshire County Council and informed by discussions with National Highways including the assessment of potential transport impact from the CLPR proposals. At application stage, development will be assessed against the CLPR policies and transport mitigation identified in consultation with Oxfordshire County Council to address the potential transport impacts of the proposed scheme.
Policy CSD22: Sustainable Transport and Connectivity Improvements	The requirement for strategic development to provide car and electric vehicle community sharing clubs and mobility hubs in accessible locations is onerous and may affect viability	LPR-D-225	Noted. All developer contributions sought by the Council will need to be compliant with the CIL regulations. The Plan and its proposals are supported by viability appraisal.
Policy CSD22: Sustainable Transport and Connectivity Improvements	The policy should recognise the importance of Main Towns in supporting sustainable development	LPR-D-165	The Plan and its evidence reflect the importance of Cherwell's towns. Place specific transport topic papers have been prepared for Banbury, Bicester and the Kidlington area published for consultation in December 2024 and published for consultation in December 2024.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Development in Category A villages supports opportunities for alternative travel modes	LPR-D-214	Noted. The Plan should be read as a whole, including Policy SP1 'Settlement Hierarchy'. Policy CSD 22 applies districtwide. When a requirement applies only to strategic sites, this is explicit in the policy text.

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Policy CSD22: Sustainable Transport and Connectivity Improvements	Concerned regarding traffic levels in areas of the district	LPR-D-157 LPR-D-171 LPR-D-201 (Middleton Stoney Parish Council) LPR-D-219 (Wendlebury Parish Council)	Noted. Transport evidence including transport modelling and sustainable transport strategy was prepared jointly with Oxfordshire County Council to support the growth planned for in the CLPR. The transport evidence supporting the CLPR has been prepared jointly with Oxfordshire County Council and informed by discussions with National Highways including the assessment of potential transport impact from the CLPR proposals. At application stage, development will be assessed against the CLPR policies and transport mitigation identified in consultation with Oxfordshire County Council to address the potential transport impacts of the proposed scheme.
Policy CSD22: Sustainable Transport and Connectivity Improvements	There is a need for investment in local transport infrastructure	LPR-D-217 (Shipton on Cherwell & Thrupp Parish Council)	Noted. This is addressed in the Transport Topic Papers prepared in collaboration with Oxfordshire County Council (published for consultation in December 2024), and the Infrastructure Delivery Plan (IDP). The IDP includes further information on infrastructure costs, funding and delivery.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Requests transparency on the taxpayer subsidised bus services in Oxfordshire. Disagrees with the 15mins mobility concept as it reduces freedom of movement	LPR-D-007	Noted. Cherwell operates in a two-tier local government structure. Cherwell and Oxfordshire Councils publish yearly in their respective websites an Infrastructure Funding Statement detailing funding secured and spent from developer contributions. Information on Oxfordshire's Bus Service Improvement Plan and partnering with local bus operators is available in the County Council's website. The CLPR supports 20-minute neighbourhood principles to enable people to meet their daily needs without relying on cars, it does not propose specific transport schemes in this regard. It is important that new development proposals facilitate active and sustainable travel. Oxfordshire County Council plans for and designs 20-minute neighbourhood schemes in consultation with local communities.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Managing travel demand by reducing the need to travel should include Sustainable Travel Modes Plans.	LPR-D-093 (Kidlington Parish Council)	Noted. OCC are preparing a Movement and Plan Strategy for the Kidlington area.

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Policy CSD22: Sustainable Transport and Connectivity Improvements	The policy ignores reference to the effects of increased electric vehicles on CO2 emission reductions. Objects to car movements being at the bottom of the list of priorities. Suggests amendments to the wording.	LPR-D-155	Disagree. The policy reflects the vision and environmental objectives of the CLPR and is consistent with the NPPF overarching objectives to promote sustainable travel.
Policy CSD22: Sustainable Transport and Connectivity Improvements	Questions the implications for Islip regarding the East West Rail development	LPR-D-161 (Islip Parish Council)	Noted. This is a nationally significant railway project. Land is safeguarded in the CLPR following a Secretary of State safeguarding direction. Consultation with local communities and Councils on the proposals and potential implications is led by East-West Rail. Outcomes of consultation in November 2024 - January 2025 are awaited.
Policy CSD22: Sustainable Transport and Connectivity Improvements	There are no mentions of HGVs for B8 schemes	LPR-D-309	This is addressed in Policy CSD 24.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	Support measures to reduce travel demand, in particular design led measures at new developments	LPR-D-200 (National Highways)	Support noted and welcomed.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	Supports the policy and suggests improvements to guard against the risk of worst-case scenarios to determine decision-making. A consistent monitoring approach to transport monitoring should be considered	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. Reference to 'worst case scenario' was added at the request of National Highways. Note that OCC guidance on how to implement 'decide and provide' include regard to worst case scenario. Suggested change on this matter is accepted and included in the list of proposed changes. Transport monitoring is a matter for the Local Transport Plan (LTCP) annual monitoring report. Monitoring information provided by OCC officers is included in Cherwell's yearly updates of the Infrastructure Delivery Plan.

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Policy CSD23: Assessing Transport Impact/ Decide and Provide	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-223 LPR-D-321	Support noted and welcomed.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	Supports the policy principle. Seeks amendments to enable compliance and focus on the delivery of infrastructure. Requests removal of road danger from criterion iii. Replace 'comply' with 'have regard to' in criterion iv	LPR-D-222	In principle support noted and welcomed. Disagree with the suggested changes. Addressing 'road danger' to create environmental where everyone feels safe is a key element of Oxfordshire's Local Transport and Connectivity Plan road safety vision (Vision Zero). Compliance with Oxfordshire Guidance on design cycle and car provision is considered appropriate.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	Supports the policy but concerned with the suggestion that that Transport Assessments "include all development in this Local Plan".	LPR-D-321	Noted. Transport modelling should include committed and not yet delivered development and planned development to provide a true assessment of road network conditions. This is a specific requirement by National Highways.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	Supports the principle of a vision-led approach to transport planning but considers the approach in its current form is not fit for purpose	LPR-D-316	Disagree. The policy has been prepared having regard to NPPF, latest Oxfordshire Local Transport Plan and developed in consultation with the two Highways Authorities.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	Object to the policy and considers there is no statutory basis for it	LPR-D-221	Disagree. The policy has been prepared having regard to NPPF, latest Oxfordshire Local Transport Plan and developed in consultation with the two Highways Authorities.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	Notes the policy ignores reference to the effects of increased electric vehicles on CO2 emission reductions. Suggests bullet iii is removed	LPR-D-155	Disagree. The policy reflects the vision and environmental objectives of the CLPR and is consistent with the NPPF overarching objectives to promote sustainable travel. Electric vehicles play a role in reducing CO2 emissions and this is relevant to many elements of the plan particularly on Air Quality and Pollution. The Plan is clear on its requirements for electric

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			vehicle infrastructure. The main objective of CSD 23 is to help deliver improved safety as well as reduction in traffic and congestion.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	The local plan makes no mention of the current traffic capacity and what it would potentially need to cope with the percentage increase in homes directly accessing it	LPR-D-339	The CLPR has been informed by transport evidence consistent with national guidance on 'Transport evidence bases in plan making and decision taking'. Matters addressed include assessment of existing conditions, cumulative impact of existing and proposed development, capacity of transport infrastructure and identification of transport proposals. Table 1 of the Transport Existing Conditions Topic Paper published in December 2024 provides an overview of transport evidence prepared to inform the December 2024 CLPR consultation and the matters covered. In addition, the Council also published for consultation place specific transport topic papers focused on Banbury, Bicester and Kidlington.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	The policy ignores reference to the effects of increased electric vehicles on CO2 emission reductions and justification for an urban based strategy needs to be amended to allow a better spread of development.	LPR-D-155	Disagree. The CLPR supports transport decarbonisation in its climate and transport policies and requires provision of electric charging infrastructure. Private electric cars use of the road network. Policy CSD23 supports Oxfordshire's 'decide and provide' approach to transport planning which decides on a preferred vision of the future and then provides the means to work towards that vision and help implement the LTCP and CLPR transport user hierarchy. Focusing development in areas that are accessible or can be made accessible by means other than the private car is justified. The CLPR, including its vision and strategy, was informed by extensive consultation and consideration of reasonable alternatives as shown in the Statement of Consultation and Sustainability Appraisal.
Policy CSD23: Assessing Transport Impact/ Decide and Provide	Requests transparency on the taxpayer subsidised bus services in Oxfordshire and disagrees with the 15-minute mobility concept as it reduces freedom of movement	LPR-D-007	Noted. Cherwell operates in a two-tier local government structure. Cherwell and Oxfordshire Councils publish yearly in their respective websites an Infrastructure Funding Statement detailing funding secured and spent from developer contributions. Information on Oxfordshire's Bus Service Improvement Plan and partnering with local bus operators is available in the County Council's website.

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			The CLPR supports 20-minute neighbourhood principles to enable people to meet their daily needs without relying on cars, it does not propose specific transport schemes in this regard. It is important that new development proposals facilitate active and sustainable travel. Oxfordshire County Council plans for and designs 20-minute neighbourhood schemes in consultation with local communities.
Policy CSD24: Freight	Supports the policy but requests inclusion of reference to logistics proposals.	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. CLPR employment policies address logistic proposals. Policy CSD24 cross refers to Oxfordshire's Freight and Logistics Strategy and HGV routing and supports provision of local delivery hubs to enable sustainable last-minute movements within the context of the Oxfordshire-wide strategy and the Local Transport and Connectivity Plan.
Policy CSD24: Freight	Concern over the new sites and the impact on the A41 corridor including increased traffic levels from Bicester to Aylesbury. Notes the current road condition is poor and acknowledges that some of the traffic is attributable to the employment sites in Buckinghamshire and HS2 traffic. Would welcome discussion on how HGV traffic can be more safely managed and requests a more strategic technical study of the impacts of development on the A41 corridor	LPR-D-108 (Buckinghamshire Council)	Noted. OCC commissioned the A41 Corridor Study, July 2022 and are progressing a Corridor Travel Plan for the A41 and a Movement and Place Strategy (MAPS) for Bicester. Transport evidence supporting the CLPR include the Transport modelling and Bicester Transport Topic Papers published for consultation in December 2024. A number of measures on the A41 have already been delivered including Ploughley Road/A41 junction improvements and the widening of the A41 (Oxford Road corridor). The role of the proposed South East Perimeter Road and measures on the Eastern Peripheral Corridor is to reduce vehicular movements along the A41 and wider area. We will continue to work with Buckinghamshire Council as the CLPR progresses to adoption and during the preparation of OCC's emerging corridor strategies and Bicester MAPS.
Policy CSD24: Freight	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-298	Support noted and welcomed.

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Policy CSD24: Freight	There is a shortfall of lorry parking facilities, would welcome identification of a site to do so.	LPR-D-083 (Banbury Town Council) LPR-D-091	Noted. As part of the Oxfordshire Freight and Logistics Strategy (2022), OCC will review current rest stops and lorry parking facilities (Action 16). The A34 and M40 are strategic roads and will require the engagement with National Highways. Neither of the two Highways Authorities quantified need nor requested provision as part of the CLPR.
Policy CSD24: Freight	The policy should have a broader more strategic scope which supports the shift to more sustainable modes of travel for the movement of freight in general. The principle of Rail Freight Interchanges should be acknowledged and supported	LPR-D-298	Disagree. Cherwell operates in a two-tier local government structure. The CLPR supports and reflects Oxfordshire Freight and Logistics Strategy and the policies in the Local Transport and Connectivity Plan.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Support the policy	LPR-D-274 (Historic England) LPR-D-020 LPR-D-083 (Banbury Town Council) LPR-D-297	Support is noted and welcomed.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Objects to the policy, recommends its deletion	LPR-D-262 LPR-D-263	The comments are noted. The Council will not be deleting Policy CSD25. The representations acknowledge the national policy to make the most efficient use of land. The Council is required to follow the Government's national planning policies and to ensure housing supply and delivery. To note the Reg 19 CDC Local Plan was produced under the requirements of the Dec 2023 NPPF. Para 129 of the 2023 NPPF refers the use of minimum density standards, a significant uplift to average densities to ensure the efficient use of land. As stated in the policy the minimum densities will need to be met unless specific local circumstances indicate otherwise.

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Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Objects as the policy sets out minimum densities on all new housing developments, not in compliance with the NPPF	LPR-D-258 LPR-D-300 LPR-D-320	The comments are noted. The Council will not be deleting Policy CSD25. The representations acknowledge the national policy to make the most efficient use of land. The Council is required to follow the Government's national planning policies and to ensure housing supply and delivery. To note the Reg 19 CDC Local Plan was produced under the requirements of the Dec 2023 NPPF. Para 129 of the 2023 NPPF refers the use of minimum density standards, a significant uplift to average densities to ensure the efficient use of land. As stated in the policy the minimum densities will need to be met unless specific local circumstances indicate otherwise.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Objects to the minimum densities of 35 dwellings/ hectare in the rural areas and recommends the policy is revised to discourage reliance on minimum densities	LPR-D-103 (Bourtons Parish Council)	The comments are noted. The Council will not be deleting Policy CSD25. The representations acknowledge the national policy to make the most efficient use of land. The Council is required to follow the Government's national planning policies and to ensure housing supply and delivery. To note the Reg 19 CDC Local Plan was produced under the requirements of the Dec 2023 NPPF. Para 129 of the 2023 NPPF refers the use of minimum density standards, a significant uplift to average densities to ensure the efficient use of land. As stated in the policy the minimum densities will need to be met unless specific local circumstances indicate otherwise.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Objects to the proposed density for Kidlington due to conflict with green spaces, BNG and GBI policies and recommends amendments	LPR-D-282	The comments are noted. The Council will not be deleting Policy CSD25. The representations acknowledge the national policy requires the most efficient use of land. The Council is required to follow the Government's national planning policies and to ensure housing supply and delivery. To note the Reg 19 CDC Local Plan was produced under the requirements of the Dec 2023 NPPF. Para 129 of the 2023 NPPF refers the use of minimum density standards, a significant uplift to average densities to ensure the efficient use of land. As stated in the Policy CSD25 the minimum densities will need to be met unless specific local circumstances indicate otherwise. As part of any development, residential developers will be required in their planning application submissions to demonstrate that they have made provision for green space, will need to meet the BNG requirements (refer to CDCLP Policy CSD12) and will need to provide green infrastructure (refer to CDCLP Policies CSD15 & COM 24).

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Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	The policy is legally compliant but requires critical developments. Wants more brownfield land to be developed in Banbury which would reduce the amount of greenfield plots. Suggests Banbury's quota should be moved to Bicester	LPR-D-194	The comments are noted. The support for brownfield development and the support for development at Banbury and Bicester is noted. In relation to existing and future traffic and highway infrastructure, CDC have worked with conjunction with the Local Highways Authority Oxfordshire County Council who have undertaken transport modelling of the proposed site allocations in the CDC Local Plan. This modelling also informs the required mitigations. CDC has also produced an Infrastructure Delivery Plan and Infrastructure Schedule which details the required infrastructure including transport that needs to be funded and delivered over this plan period. This evidence-based documentation is available on the Council's website and this formed part of the recent local plan consultation.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	The principles of the policy are not followed through in the plan and it ignores the largest brownfield opportunity in the district- Heyford Park	LPR-D-210	The comments are noted. The Council's position on Heyford Park is set out in Chapter 7 on pages 280 to 285 including in Policy HEY1 which includes the delivery of the 2022 approved masterplan. Policy Villages 5 from the adopted Cherwell Local Plan is saved for a mixed-use allocation. Some elements of Heyford Park have planning permission and the associated legal agreements which will assist in the delivery of the associated required infrastructure.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	The plan should give proper consideration and re-evaluation of the many brownfield sites in Cherwell that have currently been ignored	LPR-D-121	In considering potential allocations brownfield sites have been considered, including those on the Brownfield Register. A number of the proposed allocations are on brownfield land.

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Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Does not object to the policy itself. The principles of the policy should be applied to other policies within the Plan. The plan and plan's strategy **ignores** the benefits of sustainably located previously developed land and doesn't allow sufficient flexibility for rural previously developed land to come forward. References 123 and 124 of the NPPF.	LPR-D-203	The comments are noted.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Suggests clarification/ rewording of the policy	LPR-D-234 LPR-D-288	The comments are noted. In relation to rep LPR-D-288 a minor modification to the text has been proposed.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	The policy should clarify that the housing densities are a minimum 'average'	LPR-D-165	The comments are noted. The housing densities are a minimum (net) unless local circumstances indicate otherwise.

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Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Suggest the policy should be enforced more	LPR-D-041	The comments are noted.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Suggests that the policy should include clarification as to how larger sites are expected to achieve the minimum densities when the overall allocation is developed by a number of developers, brought forward through separate planning applications	LPR-D-237	Disagree. Larger sites are required to develop masterplans which will consider issues such as overall densities.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Suggests an increase of development density at PR6B North Oxford, CDC Partial Review LP allocation.	LPR-D-142	The comments are noted. The policy already has scope for development to come forward at higher densities. At the pre application and planning application stages the applicant can propose a higher density for their proposed development within their planning application submission.

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Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	Questions the requirement of a design panel review and recommends its removal from the policy	LPR-D-050	The comments are noted. This policy states "where there are significant concerns about unnecessary use of land, a design panel review paid for by the applicant may be sought". This relates to the planning application stage.
Policy CSD25: The Effective and Efficient Use of Land- Brownfield Land and Housing Density	The net densities are embedding private car use	LPR-D-256	The comments are noted. The Council's Local Plan meets the requirements of Oxfordshire County Council who are the Local Highways Authority. The Local Plan supports the provision of and improvements to sustainable transport in Policy CSD22 and supports infrastructure to accommodate active travel including walking, cycling and wheeling in Policy COM15 and Policy COM14 sets out the design requirements for developments including sustainable methods of travel and adopting principles of 20-minute Neighbourhoods where appropriate. The Council's Infrastructure Delivery Plan and Infrastructure Schedule include sustainable travel projects.
-	Requests that new policy on safeguarding of RAF Weston on the Green, RAF Bardford St John and RAF Croughton in the plan	LPR-D-069 (DIO/MoD)	Agree. New non-strategic policy is included in the list of proposed changes to the Plan.

LOCAL PLAN PROPOSED SUBMSSION: Maintaining and Developing a Sustainable Local Economy (CHAPTER 3: Theme 2)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Theme 2 Title	Recommends the addition of 'inclusive' to the title of theme 2	LPR-D-302 (Oxfordshire County Council)	Noted. CLPR supports an inclusive local economy. Policy LEC 5 on Community Employment Plans reinforces the update of local income and employment opportunities and seeks to increase access to skills and training to remove

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			barriers to local employment. Minor editorial amendments can be addressed following the CLPR's examination.
Theme 2 Title	Suggests removing 'local' from the description to closer align with paragraph 3.72 of the Autumn Budget 2024	LPR-D-193	Disagree. The Local Plan seeks to meet Cherwell's needs therefore the use of the term 'local' is appropriate.
Policy LEC1: Meeting Business and Employment Needs	There is a large amount of need identified but supply remains outstanding. More needs to be done to secure long term economic growth around Kidlington/knowledge spine	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council)	Local Plan does reference Knowledge Spine and there is committed development still to be built out in the Kidlington area. Acknowledge that there could be more clarity on supply and the Plan will be amended to reflect that. A greater level of detail is set out in the Employment Background Paper.
Policy LEC1: Meeting Business and Employment Needs	Welcomes the provision of additional employment	LPR-D-290 (West Oxfordshire District Council)	The comments are noted and welcomed
Policy LEC1: Meeting Business and Employment Needs	Supports the sites at Canalside and Higham Way	LPR-D-083 (Banbury Town Council)	The comments are noted and welcomed
Policy LEC1: Meeting Business and Employment Needs	Objects to the new and retained employment allocations	LPR-D-039	The approach to the selection of sites is set out in the site selection background paper. The sites have been sourced from those submitted and assessed through the Council's HELAA. These sites have been tested and assessed and are those considered most appropriate by the Council.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC1: Meeting Business and Employment Needs	Objects as it fails to deliver employment land needs over the plan period	LPR-D-152 LPR-D-320 LPR-D-319	Disagree. Alongside the completions and commitments, the employment allocations provide sufficient land.
Policy LEC1: Meeting Business and Employment Needs	Objects and requests evidence to justify the overall quantum of employment land in the immediate hinterland of Oxford, given the substantial investment in infrastructure and innovation that is underway	LPR-D-310	The evidence is published. There is development consented yet to be built out north of Oxford where land has been removed from the Green Belt.
Policy LEC1: Meeting Business and Employment Needs	There is insufficient deliverable employment land	LPR-D-258 LPR-D-288 LPR-D-293	Disagree. Alongside the completions and commitments, the employment allocations provide sufficient land.
Policy LEC1: Meeting Business and Employment Needs	Concern regarding the increase of employment from Regulation 18	LPR-D-257	The increase in employment land is supported by the updated evidence base which shows a higher level of employment need.
Policy LEC1: Meeting Business and Employment Needs	Criticises the employment associated with warehouses and requests more quality well-paid jobs	LPR-D-150	The employment allocations seek to achieve a range of jobs.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC1: Meeting Business and Employment Needs	Questions the retained focus on existing employment sites and only seeking limited additional employment development. Recommends the evidence is reviewed due to the publication of the Strategic Economic Plan for Oxfordshire	LPR-D-262 LPR-D-263	Disagree, there are a number of new employment allocations proposed within the Plan in addition to those already committed/completed.
Policy LEC1: Meeting Business and Employment Needs	The plan fails to pan for further growth in R&D and recommends amendments to Policy LEC 1 to include a mixed-use development in Policy PR6C	LPR-D-247	Disagree, the Plan seeks to provide land for a range of employment land according to the evidence base on need. Policy PR6C relates to an adopted Plan and has not been revisited within this Plan.
Policy LEC1: Meeting Business and Employment Needs	Delivery of Canalside will be a challenge, and there are limited unconstrained locations to accommodate growth needs	LPR-D-091	Recognise that the delivery of Canalside will not be without its challenge, but that is not a reason to not include the site to support and guide its delivery. This is a key brownfield site in the heart of Banbury.
Policy LEC1: Meeting Business and Employment Needs	Finds procedural errors with the evidence base which the policy is based on. There should be a greater focus on Kidlington. There is no acknowledgment of type or location of employment land opportunities to be prioritised. Suggests a new ENA should be undertaken	LPR-D-193	Disagree, the Plan seeks to provide land for a range of employment land according to the evidence base on need. There is existing employment land in Kidlington to be built out which has been removed from the Green Belt.
Policy LEC1: Meeting Business and Employment Needs	The policy fails to reflect the Oxford-Cambridge growth corridor	LPR-D-223	Disagree. The Oxford Cambridge growth corridor passes through the district, and this is referenced in the Plan.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC1: Meeting Business and Employment Needs	Questions the consideration of the economy in the draft local plan, due to no consideration of the ministerial statement, OxLEP Strategy or Strategic Economic Plan	LPR-D-223	The Plan has not explicitly mentioned every document in its preparation, but this does not mean that they have not been considered.
Policy LEC1: Meeting Business and Employment Needs	There is no reference to the Oxford Industrial Strategy and concern that there is not enough employment in Banbury. There should be greater land identified to realise growth ambitions in respect of the Oxford-Cambridge Growth Corridor and the needs of the logistics sector. The ENA update did not refresh the Banbury Area or consider market intelligence as required by PPG	LPR-D-253	The Plan has not explicitly mentioned every document in its preparation, but this does not mean that they have not been considered. Employment land has been allocated at Banbury drawing from available sites and recognising constraints.
Policy LEC1: Meeting Business and Employment Needs	Fails to consider the specific requirements of the logistics sector	LPR-D-316	Disagree, the plan allocates land for a range of uses including logistics.
Policy LEC1: Meeting Business and Employment Needs	Suggest available development should be 'at least 6ha' for land at BIC E5	LPR-D-317	Disagree, policy will be amended to reflect 'approximately'.
Policy LEC1: Meeting Business and Employment Needs	Suggest available development should be 'at least 30ha' for land at BIC E51	LPR-D-318	Disagree, Policy will be amended to reflect 'approximately'.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC1: Meeting Business and Employment Needs	Questions the delivery of retained allocations as well as Canalside and Higham way. Recommends Banbury 6,11, M/U1 and E1 and removed from the plan	LPR-D-319	Recognise that the delivery of brownfield sites are not without their challenges but that is not a reason to not include the site to support and guide its delivery. These are key sites in Banbury, some of which are in previously examined and adopted Plans.
Policy LEC1: Meeting Business and Employment Needs	There is not enough discussion of the economy in the plan. Notes there is no reference to the Oxford-Cambridge Corridor	LPR-D-341	Disagree. There is specific reference of the Oxford Cambridge Arc at 3.150
Policy LEC1: Meeting Business and Employment Needs	Notes the consultation draft proposes the allocation of 14.7ha employment land to support the expansion of Begbroke Science Park, has no objection to this	LPR-D-142	Noted and welcomed.
Policy LEC1: Meeting Business and Employment Needs	Questions the removal of Begbroke Science Park and suggests it should be reinstated	LPR-D-346	Begbroke Science Park is a commitment with outline consent and is counted towards the overall supply of employment land.
Policy LEC2: Development at Existing or Allocated Employment Sites	Supports the policy	LPR-D-290 (West Oxfordshire District Council) LPR-D-083 (Banbury Town Council) LPR-D-165	Support noted and welcomed.

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Policy LEC2: Development at Existing or Allocated Employment Sites	Objects to the policy, pending clarification in the policy to allow growth and/or an update of the supporting map to identify the extent of the employment area	LPR-D-310	Existing and allocated employment site extents are shown on the adopted policies maps for the relevant plans or in the approved plans accompanying a planning application.
Policy LEC2: Development at Existing or Allocated Employment Sites	Concern about the proposed employment allocation at J9 due to pressure on traffic infrastructure. Objects to BIC E5 due to coalescence with Ambrosden	LPR-D-327	Recognise that a number of employment allocations at Bicester will load onto J9 M40, however the Plan is supported by a full Transport Assessment and Modelling with mitigation as appropriate. It is considered that this remains the best location for employment uses.
Policy LEC2: Development at Existing or Allocated Employment Sites	It is important that the saved allocations with planning permission can deliver their approved uses rather than being bound by the draft policy. There should be more flexibility in the policy to allow future reserved matters to comply with the outline consent, even if conflict with the new policy	LPR-D-225	It is not considered that there would be conflict between saved allocations and the emerging policy. This can be reviewed on a case-by-case basis as necessary through a planning application.
Policy LEC2: Development at Existing or Allocated Employment Sites	The policy should promote redevelopment of existing commercial sites for modern commercial buildings at a mixture of sizes which sites for should be defined in the plan	LPR-D-083 (Banbury Town Council)	Redevelopment of existing employment sites is supported through the Plan. It is not necessary to identify such sites as they would be existing employment sites to satisfy the Policy.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC2: Development at Existing or Allocated Employment Sites	There should be flexibility in the policy to ensure an employment land review would be triggered immediately if an allocated employment site is no longer coming forward, and recommends reserve sites are identified	LPR-D-152	Consider the policy does provide flexibility. Some sites will take longer to come forward than others and the Plan period is over 20 years, so this would be a matter for a later Local Plan review.
Policy LEC2: Development at Existing or Allocated Employment Sites	The glossary terms are misleading. Notes the policy uses 'employment site' but the glossary only uses 'employment land'. The wording should actively encourage redevelopment and intensification of employment, and the glossary needs to be clear	LPR-D-234	Do not consider this is confusing. The policy supports redevelopment of existing sites for employment uses.
Policy LEC3: New Employment Development on Unallocated Sites	Supports the policy	LPR-D-274 (Historic England) LPR-D-152 LPR-D-293 LPR-D-240 (Fritwell Parish Council)	The comments are noted and welcomed
Policy LEC3: New Employment Development on Unallocated Sites	Supports the inclusion of a criteria-based policy to deliver additional employment land. Suggests improvements to support science and technology clusters around North Oxford/Kidlington	LPR-D-247	Welcome support. The policy covers the whole district and does not seek to identify particular areas or sites so that it can be applied flexibly.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC3: New Employment Development on Unallocated Sites	Objects to the policy, pending clarification to allow growth and/or an update of the supporting map to identify the extent of the employment area	LPR-D-310	It is not considered that further clarification is needed.
Policy LEC3: New Employment Development on Unallocated Sites	Objects as there is too much encouragement given to such development, therefore in conflict with Policy COM13	LPR-D-083 (Banbury Town Council)	Disagree that there is conflict with Policy COM13. The Policy provides flexibility with certain criteria to guide and support appropriate uses in the right locations.
Policy LEC3: New Employment Development on Unallocated Sites	Due to the lack of new allocations, the council should expect numerous employment planning applications.	LPR-D-091	Disagree. The Council has identified sufficient employment land to meet its needs. Additional land can come forward through the application of Policy LEC3.
Policy LEC3: New Employment Development on Unallocated Sites	Policy LEC 3 should make reference to LEC 1 regarding requiring a range of unit sizes	LPR-D-100	Policy LEC1 refers to specific allocations of land and whilst a range of unit sizes and types would be welcomed, this may not always be appropriate on unidentified, unallocated sites. This will be considered on a case-by-case basis.

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Policy LEC3: New Employment Development on Unallocated Sites	Welcomes the flexibility afforded for appropriate employment development on unallocated sites across the district	LPR-D-216	Noted and welcomed.
Policy LEC3: New Employment Development on Unallocated Sites	The policy is unclear if it only addresses new buildings, or where jobs are created. It is unclear if redevelopment for other employment uses is covered and requires clarity	LPR-D-234	Policy LEC3 specifically refers to Use Classes E(g), B2 or B8. Consider the Policy LEC3 is sufficiently clear.
Policy LEC3: New Employment Development on Unallocated Sites	The text for the policy should be more supportive and make reference to large scale B8 uses. There should be no differentiation for smaller villages and open countryside having additional criteria, in particular for sites on the Strategic Road Network	LPR-D-319	Consider the policy does provide flexibility. Small villages and the open countryside have additional criteria to ensure that such new sites are appropriate.
Policy LEC3: New Employment Development on Unallocated Sites	The policy fails to recognise the locational and sector requirements of the logistics market and prevents the delivery of suitable unallocated sites.	LPR-D-316	Disagree. The Plan provides employment allocations which meet identified needs.
Policy LEC3: New Employment Development	Suggest changes to wording	LPR-D-257	Policy LEC1 refers to specific allocations of land and whilst a range of unit sizes and types would be welcomed, this may not always be appropriate on unidentified, unallocated sites. This will be considered on a case-by-case basis.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
on Unallocated Sites			
Policy LEC4: Ancillary Uses on existing or allocated Employment Sites	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy LEC5: Community Employment Plans	Welcomes the policy and suggests lowering the residential threshold of 500 dwellings to secure training and employment opportunities in more circumstances	LPR-D-290 (West Oxfordshire District Council)	Welcome support. Note comment, though consider that 1,000 dwellings as a threshold is proportionate
Policy LEC5: Community Employment Plans	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-223	Support noted and welcomed.
Policy LEC5: Community Employment Plans	Supports in general but questions the definition of 'local'. Cycle path links from Bicester to Baynards Green should be considered	LPR-D-240 (Fritwell Parish Council)	Do not consider it necessary to define 'local produce'. Cycle paths can be considered for all types of development - it is not considered necessary to identify specific routes.
Policy LEC5: Community Employment Plans	Objects to the wording and seeks clarification as to how this would apply when sites are being brought forward by a number of developers	LPR-D-237	If this was being brought forward by a number of developers, there would be an expectation that they would work collaboratively to deliver what the policy requires.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC5: Community Employment Plans	The policy should be seen as complementary to policies that encourage establishment of off-site, prefabricated construction and development	LPR-D-256	Comments noted.
Policy LEC6: Supporting a Thriving and Resilient Farming Sector	Smart technologies rely on seamless network and therefore the construction of network infrastructure in rural areas and farms needs to be considered	LPR-D-302 (Oxfordshire County Council)	Agree, recognise importance of network infrastructure which needs to be delivered and support for broadband in the rural areas.
Policy LEC6: Supporting a Thriving and Resilient Farming Sector	Support the policy	LPR-D-103 (Bourtons Parish Council) LPR-D-256	Support noted and welcomed.
Policy LEC6: Supporting a Thriving and Resilient Farming Sector	Due to poor wording, it is unclear if the 20% gain only applies to the stewardship element and why development proposals will be required to demonstrate how they will measurably support a significant reduction in net carbon emission relative to the likely emissions from existing buildings and operations, which appears inflexible	LPR-D-234	The 20% gain applies to all aspects not just environmental stewardship. The reduction of net carbon emissions is a key aim for this plan, though it is recognised that there may be instances where this is not viable, hence the flexibility in the policy.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC7: Best and Most Versatile Agricultural Land	The policy sets out a very high bar including the requirement to demonstrate an essential need that is in the public interest	LPR-D-290 (West Oxfordshire District Council)	The policy does set a high bar, given the importance of best and most versatile agricultural land in accordance with NPPF2023 at paragraphs 180 and 181 the importance of food production at paragraph 124 and in footnote 62.
Policy LEC7: Best and Most Versatile Agricultural Land	Support the policy	LPR-D-041	Support noted and welcomed.
Policy LEC7: Best and Most Versatile Agricultural Land	Supports the policy but suggests amendments to rectify minor concerns on the application to unplanned development	LPR-D-321	Disagree with proposed amendment. Unplanned is unallocated development.
Policy LEC7: Best and Most Versatile Agricultural Land	Questions the evidence to justify the policy. Recommends amendments	LPR-D-050	The policy does set a high bar, given the importance of best and most versatile agricultural land in accordance with NPPF2023 at paragraphs 180 and 181 the importance of food production at paragraph 124 and in footnote 62. The Cherwell Food Action Plan seeks to promote the local food economy and environmentally friendly farming efforts. The policy accords with the NPPF which seeks to recognise the economic and other benefits of the best and most versatile agricultural land.
Policy LEC7: Best and Most Versatile Agricultural Land	The requirement for the applicant to pay for independent verification of the report is unmerited and should be covered by the application fees if inhouse expertise does not exist. Queries why the policy does not protect BMV land from BNG proposals. Recommends a size threshold should be included to ensure the policy is applied proportionately	LPR-D-234	Disagree. The applicant should bear the cost of this. It is not the case that the best and most versatile agricultural land would not be protected from BNG proposals. The policy accords with the NPPF which seeks to recognise the economic and other benefits of the best and most versatile agricultural land.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC7: Best and Most Versatile Agricultural Land	The policy goes beyond the NPPF and should refer to national policy tests regarding the loss of BMV land	LPR-D-236	The policy does set a high bar, given the importance of best and most versatile agricultural land in accordance with NPPF2023 at paragraphs 180 and 181 the importance of food production at paragraph 124 and in footnote 62. The Cherwell Food Action Plan seeks to promote the local food economy and environmentally friendly farming efforts. The policy accords with the NPPF which seeks to recognise the economic and other benefits of the best and most versatile agricultural land.
Policy LEC8: Rural Diversification	Rural diversification will lead to previously farmed land being repurposed which may have impacts on heritage assets. Recommends the policy is amended to recognise the requirement for heritage/archaeological assessment ahead of a scheme	LPR-D-302 (Oxfordshire County Council)	Recognise that rural diversification could have impacts on heritage assets, but a heritage/archaeological assessment can be requested to support any planning application.
Policy LEC8: Rural Diversification	The policy should refer to heritage significance not just the character and appearance of buildings. Recommends amendments to the wording	LPR-D-274 (Historic England)	Consider this is required by Policy COM14 and not necessary to repeat here.
Policy LEC8: Rural Diversification	Support the policy	LPR-D-041	Support noted and welcomed.
Policy LEC8: Rural Diversification	Objects to wording within the policy, and recommends amendments	LPR-D-299	Partly disagree. The character and appearance of buildings is important. Remove criterion ii
Policy LEC8: Rural Diversification	The policy is good, but to prove a viability case the threshold should be set at a high level	LPR-D-256	The policy does not specify a level of viability, rather that it needs to be positive.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC8: Rural Diversification	The policy title refers to rural diversification but changes tack halfway through to refer to agricultural undertakings. Not all rural businesses are agricultural, and it is unclear if all criteria must be met to achieve compliance. Recommends alterations to wording	LPR-D-234	Agree. Remove criterion ii
Policy LEC9: Tourism	Supports the policy but suggests improvements and alterations to wording	LPR-D-302 (Oxfordshire County Council)	Welcome support. Comments noted.
Policy LEC9: Tourism	Supports the policy	LPR-D-082 LPR-D-083 (Banbury Town Council) LPR-D-222	The comments are noted and welcomed
Policy LEC9: Tourism	Objects to the term 'functional link' as it is vaguely worded and in possible conflict with the NPPF. Recommends amendments to the policy	LPR-D-299	Disagree, provides flexibility in policy.
Policy LEC9: Tourism	There is no mention of enhancing Banbury as a tourist destination	LPR-D-020	There is no specific mention of any location in the district. It applies across the district.
Policy LEC9: Tourism	Reusing existing buildings often is not the most appropriate way to pursue sustainable development. The policy should recognise that small scale rural proposals for tourist development do not need to follow the town centre first approach. It is also unclear if all the	LPR-D-234	If the proposal is in a village or open countryside, all parts of the latter part of the policy will apply. Those proposals need to show that they are not deliverable within or adjacent to a town or service centre.

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	criteria in the policy needs to be met or only some		
Policy LEC9: Tourism	Concerns that Bicester Village visitors could put pressure on local housing supply	LPR-D-256	Disagree. It is not considered that those visiting Bicester Village would purchase a second home purely for the sole reason of destination shopping. It is considered that whilst the attraction of the retail at this location could be a factor in people's reason to relocate from elsewhere it would be alongside numerous other factors. Relocation or second home ownership purely for a retail offer that can be met through day trips or occasional overnight stays.
Policy LEC10: Town Centre Hierarchy and Retail Uses	Town centres are frequently of high archaeological importance. Supports the sustainability of town centres but there should be careful consideration to ensure town centre developments conserve and enhance the historic environment	LPR-D-302	The comments are noted and proposed changes to the text have been proposed.
Policy LEC10: Town Centre Hierarchy and Retail Uses	Support the policy	LPR-D-083 (Banbury Town Council) LPR-D-222 LPR-D-240 (Fritwell Parish Council)	The comments are noted and welcomed
Policy LEC10: Town Centre Hierachy and Retail Uses	Supports the policy but needs clarity on town centre in strategic developments. Requests amendments	LPR-D-321	The comments are noted. Disagree, the strategic developments are not creating new town centres.

LOCAL PLAN PROPOSED SUBMSSION: Maintaining and Developing a Sustainable Local Economy (CHAPTER 3: Theme 2)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC10: Town Centre Hierarchy and Retail Uses	Supports the aspirations to see new local centres in allocated strategic sites	LPR-D-237	The comments are noted and welcomed
Policy LEC10: Town Centre Hierarchy and Retail Uses	Welcomes Policy. Questions on guiding incoming businesses to take units in the town centre area	LPR-D-020	The comments are noted. Incoming businesses will decide where they wish to locate, depending on their specific business requirements and this may or may not require planning permission. In terms of their consideration of the use of an out of town unit this will depend on the current planning consent of an individual unit or whether it requires planning permission for a change of use. Some businesses require larger units and additional facilities that may not be able to be accommodated in a town centre.
Policy LEC10: Town Centre Hierarchy and Retail Uses	The wording makes no reference to Heyford Park as a Local Service Centre and is inconsistent with the strategy statement. The policy should be redrafted to ensure this is recognised	LPR-D-210	The comments are noted. Disagree. The policy does not make specific reference to any particular named Local Service Centre and the policy does not need to list all of the Local Service Centres that are within the district.
Policy LEC11: Primary Shopping Areas	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy LEC11: Primary Shopping Areas	The policy does not offer enough flexibility to allow the highstreets to thrive and adapt. The requirement to meet all three criteria in the policy is overly restrictive. Local neighbourhood is not defined and therefore is difficult to interpret. The policy should be amended to address this	LPR-D-234	Noted. It is considered that the policy is not overly restrictive as it seeks to protect 'E Class' uses within Primary Shopping Areas.

LOCAL PLAN PROPOSED SUBMSSION: Maintaining and Developing a Sustainable Local Economy (CHAPTER 3: Theme 2)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy LEC12: Outdoor Markets	Supports the policy	LPR-D-083 (Banbury Town Council)	The comments are noted and welcomed
Policy LEC13: Shopfronts and Signage	Supports the policy	LPR-D-274 (Historic England) LPR-D-083	The comments are noted and welcomed

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Housing Requirement	The proposed housing supply for Banbury is supported	LPR-D-134	Support is noted and welcomed.
Housing Requirement	The use of standard method rather than the former HENA is sound. The inclusion of unmet need within the housing requirement is also considered to be sound	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council)	Noted and welcomed
Housing Requirement	Welcomes the inclusion of 4400 homes for Oxford's unmet need to 2036 but questions the delivery of this including not bringing forward partial	LPR-D-251 (Oxford City Council)	Noted. The 4,400 homes to meet Oxford's unmet housing needs will be met by saving the relevant adopted policies from the 2020 Partial Review Cherwell Local Plan. The plan proposes one housing requirement figure in accordance with Government guidance. A separate overall supply for Oxford's needs is therefore

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
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	review sites into this plan and finds this unsound. It is unclear how Oxford's needs will be met as there is no breakdown of need due to the two needs being put together making monitoring difficult. Disappointed that Cherwell has used the old standard method under transitional arrangements which will vastly underestimate housing need		not included. However, the delivery of the specific sites allocated to meet Oxford's needs will be monitored. The comments relating to the progression of the Plan under the transitional arrangements are noted.
Housing Requirement	Objects to rolling forward the 4400 unmet need beyond 2031 and considers this not justified. Questions how the current 5YHLS shortfall will be solved	LPR-D-268	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
			The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.
Housing Requirement	The proposed number of houses is unnecessary	LPR-D-012 LPR-D-022	Disagree. The Plan meets Cherwell's objectively assessed needs and provides for Oxford's unmet housing needs. Additional housing has been included to help deliver further social/affordable housing, support placemaking and provide contingency.
Housing Requirement	Notes concern over the increased housing in Bicester	LPR-D-339	Bicester, together with Banbury, is the most sustainable location within the district therefore it is appropriate to consider it for additional housing allocations.
Housing Requirement	The housing requirement cannot provide sufficient supply and mix of sites due to issues with housing completion and previous failures to ensure a 5YHLS	LPR-D-054	Disagree. The Plan addresses objectively assessed needs. The trajectory shows that delivery will ensure a 5yhls for at least the first five years of the Plan following adoption.
Housing Requirement	Believes that it is only compliant with paragraph 234 requirements of the NPPF by including Oxford's unmet need and without this the plan can only demonstrate 63.5% of local housing need. Therefore additional sites should be considered for allocation	LPR-D-230 LPR-D-231 LPR-D-232 LPR-D-137 LPR-D-165	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

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			The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met. No further housing is required.
Housing Requirement	The plan falls short of legal housing requirement under the new NPPF	LPR-D-151 LPR-D-164	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning

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			Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.
Housing Requirement	Housing numbers should follow the 80% of the Standard Method (894) under the new NPPF. Notes the majority of housing is likely to come forward no earlier than 2029. Another housing site should be allocated	LPR-D-299	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.

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Housing Requirement	There is no evidence that at least 10% of housing needs can be delivered on sites less than 1ha. This evidence is needed	LPR-D-138	Disagree. It is expected that at least 100 homes will be delivered annually on windfall sites. This figure is over 10% of the 911 annual requirement. Evidence to support the windfall figure is set out in the Council's Annual Monitoring Reports (AMR)
Housing Requirement	The draft Local Plan should consider the issue of the current shortfall in delivery that the Local Plan Review needs to respond to given the 2.3 year supply	LPR-D-233	Disagree. This Plan will set a new annual requirement against which the 5 YHLS will be calculated.
Housing Requirement	There is insufficient evidence that the plan will establish a 5-year supply on adoption	LPR-D-255 LPR-D-341	A trajectory of housing delivery is provided at Appendix 2 of the Plan. This is being updated based on the latest monitoring data. Further details will be provided in a Delivery Background Paper.
Housing Requirement	Concern regarding the existing supply assumptions and the windfall assumption going forward	LPR-D-275	A trajectory of housing delivery is provided at Appendix 2 of the Plan. This is being updated based on the latest monitoring data. Further details will be provided in a Delivery Background Paper.
Housing Requirement	There remains a considerable housing need which the council should meet so far as is practical	LPR-D-224	Disagree. The Plan meets the objectively assessed need under the NPPF transitional arrangements.
Housing Requirement	The previous 2015 and 2020 plans have failed to deliver sufficient homes and Regulation 19 restricts development further	LPR-D-153	Disagree. The Plan provides a strategy to meet housing needs.
Housing Requirement	The plan fails to take any consideration of the development that has already occurred in and around	LPR-D-121	Disagree. The Plan has considered existing development. Bicester, together with Banbury, is the most sustainable location within the district.

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	Bicester or other developments which have now gained planning permission		
Policy COM1: District Wide Housing Distribution	Supports the policy	LPR-D-274 (Historic England) LPR-D-102	Support is noted and welcomed.
Policy COM1: District Wide Housing Distribution	The level 1, level 2 SFRAs and the sequential and exception tests do not justify the proposed housing growth in the policy	LPR-D-312 (Environment Agency)	Disagree, the SFRAs and sequential test do support the level of growth set out in the Plan.
Policy COM1: District Wide Housing Distribution	Agrees that the plan meets the transitional arrangements in terms of being within 80% of the standard method figure. Notes the AMR reports less than a 5 year housing land supply and therefore supports progressing the plan so there is less threat of unplanned developments	LPR-D-302 (Oxfordshire County Council)	The comments are noted and welcomed
Policy COM1: District Wide Housing Distribution	The plan proposes an additional 4000 homes and therefore encourages the consideration of a stepped approach	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council) LPR-D-301	The comments are noted and welcomed

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Policy COM1: District Wide Housing Distribution	The reliance on 3 new strategic sites is unsound as they will take time to deliver. Reference to Oxford City Local Plan should be removed as it has been withdrawn. There is no annual need requirement which should be included in the policy. Clarification is needed regarding what is to cover Oxford City's unmet need, which should be met by 2036. The tables require clarification	LPR-D-251 (Oxford City Council)	The Policy makes it clear that there is already a significant supply pipeline from existing allocations in adopted local plans and through existing commitments. Where appropriate these site allocation policies are being 'saved'. The three new strategic sites are in addition to this pipeline. The annual requirement is set out in paragraph 3.209, but it is accepted that this should also be referenced in the Policy. A proposed change to this effect is suggested. On 26 September 2016, the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) considered a report summarising the output of countywide work in the interest of assisting Oxford with its unmet housing need. The Growth Board decided on an apportionment of 14,850 homes to the district and city councils. Cherwell District was asked to consider the accommodation of 4,400 homes in addition to its existing Local Plan commitments and the countywide apportionment was embedded in a Memorandum of Cooperation signed by five of the six Oxfordshire Councils in 2016. Oxford's existing adopted Local Plan (2016-36) is informed by a roll-forward of a Strategic Housing Market Assessment in 2018 – a need of some 1,346 homes per annum to meet its affordable housing needs in full. Its current need figure from applying the Standard Method is 1087 homes per annum. The City are now progressing a new Local Plan which will cover the period 2022 – 2042. There remains, based on the most current evidence available, an unmet housing need to meet and we are continuing with our commitment to meet the identified need for 4,400 homes previously identified by saving relevant Local Plan policies. No homes have yet been delivered to meet this need. We do not consider that we need to accommodate additional housing for Oxford in this Local Plan.
Policy COM1: District Wide Housing Distribution	Does not object to the housing requirement of 911/annum as long as the Local Plan ensures adequate healthcare provision and capacity	LPR-D-272 (BOB ICB)	The comments are noted and welcomed

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Policy COM1: District Wide Housing Distribution	Objects to the policy. The draft Plan does not meet the transitional arrangements for plan-making in NPPF paragraph 234. The draft plan should not proceed to Examination because it fails the requirements of paragraph 36 of the NPPF.	LPR-D-305	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.

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Policy COM1: District Wide Housing Distribution	Objects as the plan fails to meet the transitional arrangements	LPR-D-155 LPR_D_606 LPR-D-214 LPR-D-267 LPR-D-236	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.

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Policy COM1: District Wide Housing Distribution	Objects to the housing requirement number	LPR-D-136 LPR-D-229 LPR-D-237 LPR-D-137 LPR-D-255 LPR-D-258 LPR-D-262 LPR-D-263 LPR-D-265 LPR-D-282 LPR-D-287 LPR-D-288 LPR-D-300 LPR-D-320	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Objects to not using the 2024 Standard Method	LPR-D-311	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Objects as it is unfair that Cherwell is forced to take on the housing needs of Oxford.	LPR-D-041	On 26 September 2016, the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) considered a report summarising the output of countywide work in the interest of assisting Oxford with its unmet housing need. The Growth Board decided on an apportionment of 14,850 homes to the district and city councils. Cherwell District was asked to consider the accommodation of 4,400 homes in addition to its existing Local Plan commitments and the countywide apportionment was embedded in a Memorandum of Cooperation signed by five of the six Oxfordshire Councils in 2016. Oxford's existing adopted Local Plan (2016-36) is informed by a roll-forward of a Strategic Housing Market Assessment in 2018 – a need of some 1,346 homes per annum to meet its affordable housing needs in full. Its current need figure from applying the Standard Method is 1087 homes per annum. The City are now progressing a new Local Plan which will cover the period 2022 – 2042. There remains, based on the most current evidence available, an unmet housing need to meet and we are continuing with our commitment to meet the identified need for 4,400 homes previously identified by saving relevant Local Plan policies. No homes have yet been delivered to meet this need. We do not consider that we need to accommodate additional housing for Oxford in this Local Plan. Moreover, on 15th October 2024, under the Duty to Cooperate, Cherwell and Oxford City Council reached an understanding that the 4,400 dwellings would be brought forward through this emerging Plan to meet unmet need. No additional accommodation was requested.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Object to the roll forward of Oxford's unmet undelivered need	LPR-D-303 LPR-D-304	On 26 September 2016, the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) considered a report summarising the output of countywide work in the interest of assisting Oxford with its unmet housing need. The Growth Board decided on an apportionment of 14,850 homes to the district and city councils. Cherwell District was asked to consider the accommodation of 4,400 homes in addition to its existing Local Plan commitments and the countywide apportionment was embedded in a Memorandum of Cooperation signed by five of the six Oxfordshire Councils in 2016. Oxford's existing adopted Local Plan (2016-36) is informed by a roll-forward of a Strategic Housing Market Assessment in 2018 – a need of some 1,346 homes per annum to meet its affordable housing needs in full. Its current need figure from applying the Standard Method is 1087 homes per annum. The City are now progressing a new Local Plan which will cover the period 2022 – 2042. There remains, based on the most current evidence available, an unmet housing need to meet and we are continuing with our commitment to meet the identified need for 4,400 homes previously identified by saving relevant Local Plan policies. No homes have yet been delivered to meet this need. We do not consider that we need to accommodate additional housing for Oxford in this Local Plan. Moreover, on 15th October 2024, under the Duty to Cooperate, Cherwell and Oxford City Council reached an understanding that the 4,400 dwellings would be brought forward through this emerging Plan to meet unmet need. No additional accommodation was requested.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Objects to the inclusion of Oxford's unmet need as it is a different period to the draft Local Plan	LPR-D-204 LPR-D-262 LPR-D-263 LPR-D-269	On 26 September 2016, the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) considered a report summarising the output of countywide work in the interest of assisting Oxford with its unmet housing need. The Growth Board decided on an apportionment of 14,850 homes to the district and city councils. Cherwell District was asked to consider the accommodation of 4,400 homes in addition to its existing Local Plan commitments and the countywide apportionment was embedded in a Memorandum of Cooperation signed by five of the six Oxfordshire Councils in 2016. Oxford's existing adopted Local Plan (2016-36) is informed by a roll-forward of a Strategic Housing Market Assessment in 2018 – a need of some 1,346 homes per annum to meet its affordable housing needs in full. Its current need figure from applying the Standard Method is 1087 homes per annum. The City are now progressing a new Local Plan which will cover the period 2022 – 2042. There remains, based on the most current evidence available, an unmet housing need to meet and we are continuing with our commitment to meet the identified need for 4,400 homes previously identified by saving relevant Local Plan policies. No homes have yet been delivered to meet this need. We do not consider that we need to accommodate additional housing for Oxford in this Local Plan. Moreover, on 15th October 2024, under the Duty to Cooperate, Cherwell and Oxford City Council reached an understanding that the 4,400 dwellings would be brought forward through this emerging Plan to meet unmet need. No additional accommodation was requested.
Policy COM1: District Wide Housing Distribution	Objects the retention of PR6b	LPR-D-068	This site is an allocation in the adopted Cherwell Local Plan Partial Review to meet Oxford's Unmet Housing Need. The Policy is saved.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	The approach is flawed as it draws together Cherwell's need and Oxford's unmet need to meet the minimum requirements	LPR-D-226 LPR-D-227 LPR-D-229 LPR-D-248 LPR_D_97❶	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Oxford's unmet need should be delivered by 2031 meaning at least 1,339dpa is required between 2024 and 2031 and therefore there is a shortfall in delivery over the 1st five years of the plan. Recognises that the joint HENA was considered not robust by the inspector at the EIP in Oxford and that the standard method does not take account of ambitions for economic growth	LPR-D-138	On 26 September 2016, the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) considered a report summarising the output of countywide work in the interest of assisting Oxford with its unmet housing need. The Growth Board decided on an apportionment of 14,850 homes to the district and city councils. Cherwell District was asked to consider the accommodation of 4,400 homes in addition to its existing Local Plan commitments and the countywide apportionment was embedded in a Memorandum of Cooperation signed by five of the six Oxfordshire Councils in 2016. Oxford's existing adopted Local Plan (2016-36) is informed by a roll-forward of a Strategic Housing Market Assessment in 2018 – a need of some 1,346 homes per annum to meet its affordable housing needs in full. Its current need figure from applying the Standard Method is 1087 homes per annum. The City are now progressing a new Local Plan which will cover the period 2022 – 2042. There remains, based on the most current evidence available, an unmet housing need to meet and we are continuing with our commitment to meet the identified need for 4,400 homes previously identified by saving relevant Local Plan policies. No homes have yet been delivered to meet this need. We do not consider that we need to accommodate additional housing for Oxford in this Local Plan. Moreover, on 15th October 2024, under the Duty to Cooperate, Cherwell and Oxford City Council reached an understanding that the 4,400 dwellings would be brought forward through this emerging Plan to meet unmet need. No additional accommodation was requested.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Questions Oxford City's unmet need requirement due to the withdrawal of the Oxford City Plan	LPR-D-346	On 26 September 2016, the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) considered a report summarising the output of countywide work in the interest of assisting Oxford with its unmet housing need. The Growth Board decided on an apportionment of 14,850 homes to the district and city councils. Cherwell District was asked to consider the accommodation of 4,400 homes in addition to its existing Local Plan commitments and the countywide apportionment was embedded in a Memorandum of Cooperation signed by five of the six Oxfordshire Councils in 2016. Oxford's existing adopted Local Plan (2016-36) is informed by a roll-forward of a Strategic Housing Market Assessment in 2018 – a need of some 1,346 homes per annum to meet its affordable housing needs in full. Its current need figure from applying the Standard Method is 1087 homes per annum. The City are now progressing a new Local Plan which will cover the period 2022 – 2042. There remains, based on the most current evidence available, an unmet housing need to meet and we are continuing with our commitment to meet the identified need for 4,400 homes previously identified by saving relevant Local Plan policies. No homes have yet been delivered to meet this need. We do not consider that we need to accommodate additional housing for Oxford in this Local Plan. Moreover, on 15th October 2024, under the Duty to Cooperate, Cherwell and Oxford City Council reached an understanding that the 4,400 dwellings would be brought forward through this emerging Plan to meet unmet need. No additional accommodation was requested.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	It is unclear if the transitional arrangements allow for a proportion of the housing need to be meeting unmet needs of another area	LPR-D-164 LPR-D-165	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	The policy is not positively prepared or effective regarding its approach to several core themes including the plan period, accounting for Oxford City's unmet need, the significant need for affordable housing and the requirement to support economic growth. Suggests amendments	LPR-D-105	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Additional sites should be allocated to meet a greater housing need	LPR_D_79❸ LPR_D_87❶ LPR-D-224 LPR-D-236 LPR-D-248 LPR-D-250 LPR-D-282 LPR-D-287 LPR-D-299 LPR-D-305 LPR-D-315 LPR-D-341	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met. No further housing is required.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	The proposed housing requirement is not capable of meeting the housing needs of the district and so the spatial strategy is insufficient in meeting the housing needs.	LPR-D-137 LPR-D-211	Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF. NPPF paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method, unless there are exceptional circumstances which justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 67 states that strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The December 2024 NPPF at paragraph 234(a) states that for the purposes of plan making the transitional arrangements apply where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need calculated using the standard method in national planning practice published on 12 December 2024. The local housing need figure, calculated in accordance with the Planning Practice Guidance published on 12 December 2024, is 1118 dwellings per year. The housing requirement in the Local Plan is 911 dwellings per year. That is 81.5% of the local housing need figure. The transitional arrangements are therefore met. No further housing is required.
Policy COM1: District Wide Housing Distribution	The policy is not positively prepared as it proposes a lower housing figure than in the adopted Local Plan	LPR-D-203 LPR-D-210	Disagree. The housing requirement has been prepared in accordance with Government advice.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	There should be greater growth in the villages/ rural areas	LPR-D-137 LPR-D-220 LPR-D-254 LPR-D-283 LPR-D-297 LPR-D-322	The Plan's spatial strategy is to direct most development to the most sustainable locations. The relative sustainability of our villages and rural areas is low. It is considered that the spatial strategy is appropriate and consistent with national policy.
Policy COM1: District Wide Housing Distribution	The plan should seek to deliver a wider choice of homes to accommodate local needs	LPR-D-155	It is considered that the Plan does provide the opportunity to provide a wide choice of homes to accommodate local needs.
Policy COM1: District Wide Housing Distribution	There is no robust justification for the proposed windfall allowance	LPR-D-211	The Council produces an Annual Monitoring Report which reports on housing delivery. Based on past windfall trends the allowance in the local plan is considered to be appropriate and justified.
Policy COM1: District Wide Housing Distribution	The windfall allowance should be increased	LPR-D-220	The Council produces an Annual Monitoring Report which reports on housing delivery. Based on past windfall trends the allowance in the local plan is considered to be appropriate and justified.
Policy COM1: District Wide Housing Distribution	The windfall assumption is too high when considered against the AMR	LPR-D-287 LPR-D-314	The Council produces an Annual Monitoring Report which reports on housing delivery. Based on past windfall trends the allowance in the local plan is considered to be appropriate and justified.
Policy COM1: District Wide Housing Distribution	The policy does not support government ambition to boost housing delivery	LPR-D-223	The Local Plan accords with the transitional arrangements set out in the December 2024 NPPF.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	There needs to be an immediate review following adoption of the plan	LPR-D-208 LPR-D-262 LPR-D-263	Government advice states that local plans should be reviewed at least every five years.
Policy COM1: District Wide Housing Distribution	The plan period should be amended	LPR-D-138 LPR-D-164 LPR-D-203 LPR-D-210 LPR-D-248	Disagree. There is a requirement that the Plan should cover at least a 15 year period post adoption. We anticipate that the Plan will be adopted in 2026. An end date of 2042 is 16 years post adoption.
Policy COM1: District Wide Housing Distribution	The council has failed to provide a robust trajectory showing how and when sites will be delivered. The housing supply set out is flawed	LPR-D-091	Disagree. Appendix 2 of the Plan provides information on housing supply and the proposed housing trajectory. This will be updated based on updated monitoring for Submission.
Policy COM1: District Wide Housing Distribution	The Partial Review sites do not have a 'good pipeline of housing supply'	LPR-D-282	Disagree.
Policy COM1: District Wide Housing Distribution	Concern regarding overreliance on strategic sites in the Green Belt	LPR-D-211	Disagree. The Plan does not rely on any strategic sites within the Green Belt.
Policy COM1: District Wide Housing Distribution	Question the evidence to support the 4,300 dwellings to be delivered post plan-period	LPR-D-305 LPR-D-308 LPR-D-341	The 4,300 dwellings proposed post 2042 wholly relates to the major strategic extension to NW Bicester (Policy BIC 1).

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Questions the deliverability of North West Bicester and states there are insufficient deliverable sites to achieve a 5 year housing land supply	LPR-D-233	Development at NW Bicester has commenced and planning applications are being determined. The Council is confident the site will be delivered.
Policy COM1: District Wide Housing Distribution	There is no reason why the allocation at North West Bicester could not be delivered largely during the plan period	LPR-D-237	It is considered that the trajectory for delivery at NW Bicester is reasonable.
Policy COM1: District Wide Housing Distribution	There is an overreliance on delivery at North West Bicester	LPR-D-276	Disagree. The Plan proposes a range of sites across the District in addition to saved allocations in existing adopted Plans.
Policy COM1: District Wide Housing Distribution	Development in accordance with the settlement hierarchy should not be limited and figures for delivery at North West Bicester should be expressed as minimums. This would add flexibility to the anticipated supply.	LPR-D-266	The site specific housing figures in the Plan are based on developer information and site capacity assessments including the HELAA and are considered reasonable. If a scheme were to come forward proposing a higher housing figure then this would be considered having regard to all relevant local plan policies. The figure is not intended to be a cap.
Policy COM1: District Wide Housing Distribution	There is an overreliance on larger scale developments which have longer timeframes for permission and delivery and do not help in delivery of housing	LPR_D_6[illegible]0	Disagree. There are a range of development sites. An allowance is also made for small site windfalls.
Policy COM1: District Wide Housing Distribution	The plan fails to acknowledge the insufficient housing land supply of 2.3 years	LPR-D-190 LPR-D-276	The Plan sets a new annual housing requirement.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	Justification for the departure from the HENA is required	LPR-D-227 LPR-D-295	The Council has withdrawn the HENA as evidence supporting the Local Plan.
Policy COM1: District Wide Housing Distribution	There is no full assessment of housing needs provided	LPR-D-276 LPR-D-282	A summary assessment of housing need is provided at para 3.200 of the Plan. Further details will be provided in a background paper.
Policy COM1: District Wide Housing Distribution	The housing requirement does not reflect the evidence base or the findings of the OGNA	LPR-D-288	The OGNA was prepared to support the preparation of the Oxfordshire Plan work on which ceased in 2023.
Policy COM1: District Wide Housing Distribution	A Green Belt Review should be conducted	LPR-D-341	The Plan is supported by appropriate green belt assessments.
Policy COM1: District Wide Housing Distribution	Seeks clarification on the impacts of the policy on Islip and the policies implementation	LPR-D-161 (Islip Parish Council)	Islip is Category C settlement as it is washed over by the Green Belt.
Policy COM1: District Wide Housing Distribution	The policy should be to build homes where demand is highest dictated by the highest house prices. Allocating housing in the poorest districts will entrench social inequity. S106 monies to the county council are not being spent in Banbury, and rather, spent in Oxford	LPR-D-007	Disagree. The Plan provides for homes in accordance with Government guidance.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM1: District Wide Housing Distribution	There is no specific mention to flats above shops, considers this should be encouraged	LPR_D_686	The policies in the Plan encourage residential units within town centres.
Policy COM1: District Wide Housing Distribution	The plan envisaged 565 homes will be delivered through allocations in Neighbourhood plans but there is no guarantee such plans will come forward	LPR-D-064	Disagree. There is confidence that these sites will be allocated in neighbourhood plans. Many are well advanced.
Policy COM1: District Wide Housing Distribution	There is no discussion in the plan about the potential for uplifts in housing needs figure to help meet specific housing needs of the local community	LPR-D-262 LPR-D-263	The standard method figure includes factors such as affordability and need.
Policy COM1: District Wide Housing Distribution	It is unclear what additional housing is provided to help deliver further social and affordable housing as a contingency	LPR-D-221	The additional housing is both a contingency and also helps to deliver further social and affordable housing.
Policy COM2: Affordable Housing	Supports the policy	LPR-D-020 LPR-D-083 (Banbury Town Council) LPR-D-134 LPR-D-297	Support noted and welcomed.
Policy COM2: Affordable Housing	Supports the 35% affordable housing requirement in rural areas. Suggests at least 30% of the 70% affordable rented homes should be social rent and in villages where few qualify to go on the housing register, the number of first	LPR-D-089 (Deddington Parish Council)	Support noted and welcomed. The policy proposes the greatest proportion of affordable housing (70%) to be the most affordable tenures (social rent and affordable rent) with a 35% minimum requirement for social rent homes. The reminder 30% is required for other forms of affordable housing

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	homes/shared ownership should be raised to 50%. The plan should explicitly state that people with a strong local connection and key workers should be prioritised for affordable accommodation in that area		including intermediate housing. The Council is prioritising social and affordable rent in response to local housing need evidence. Cherwell Housing Allocations Scheme (2025) explain the allocation of affordable housing in Cherwell including rural letting schemes. This includes mechanisms to provide priority to those with connections with the village.
Policy COM2: Affordable Housing	Supports the policy but suggests improvements. The 50% requirement for saved Local Plan Partial Review sites should be clearer. The requirement for developments to be tenure-blind should be added	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. Suggested improvements are unnecessary. Saved LPPR (2020) site policies are listed in LP Appendix 1. Paragraph 3.2.19 supporting Policy COM2 makes clear that the 50% requirement applies to those saved site policies. Tenure blind development is a design principle. Policy COM 14 requires proposals to demonstrate high quality, inclusive and sustainable design. Cherwell Residential Design Guide (2018) provides further advice including affordable housing to be indistinguishable from market sale homes.
Policy COM2: Affordable Housing	There is no clarity whether all elements of the policy should be excluded from the partial review sites. The requirement of 60 extra care units should be removed from the policy	LPR-D-251 (Oxford City Council)	Disagree. Policy COM 2 makes clear that 'Housing to meet Oxford's unmet housing needs will be considered against the saved policies in the Local Plan Partial Review (2020)'. Saved LPPR (2020) policies are listed in LP Appendix 1.
Policy COM2: Affordable Housing	No concern with the 35% affordable housing requirement but notes West Oxfordshire requires 50% affordable housing at Woodstock and the surrounding areas	LPR-D-290 (West Oxfordshire District Council)	We note that West Oxfordshire Local Plan (2018) Policy H3 requires 50% affordable housing in the Woodstock area with no policy specification of the tenure split. Policy COM 2 affordable housing requirement was set following a viability appraisal range up to 50%. Policy COM2 prioritises the provision of social or affordable rented housing and has been informed by up-to-date evidence on housing need and viability appraisal. We will continue to engage with West Oxfordshire County Council to address and resolve relevant matters as we progress the CLPR to adoption including understanding the percentage of affordable housing currently being achieved in the Woodstock area.
Policy COM2: Affordable Housing	Supports the policy but requests clarification regarding elements of the policy, including relationship with Policy RUR 2 and references to 'sufficient benefit' and exceptional circumstances.	LPR-D-161 (Isip Parish Council) LPR-D-165 LPR-D-214	Support noted and welcomed. Rural exception sites will be required to comply with Policy RUR 2 not Policy COM2. Improvements to policy text are included in the list of proposed changes to the Plan.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM2: Affordable Housing	Supports the policy but suggests the policy should allow for flexibility to consider circumstances where a reduction of affordable housing is necessary.	LPR-D-237	Disagree. The affordable housing requirement has been informed by a viability appraisal and the policy text establishes what is expected when it is demonstrated that requirements cannot be met. As per NPPF advice, it is up to the applicant to justify the need for a viability assessment at application stage.
Policy COM2: Affordable Housing	Generally, in support but questions the impact of the Building Safety Levy in viability. Suggests an uplift to the housing requirement and the proportion of affordable housing in each site development.	LPR-D-262 LPR-D-263	Noted. Government confirmed in March 2025 that policy proposals in their technical consultation on the Building Safety Levy (BSL) November 2022/December 2023 will be taken forward. This will require the preparation and approval of secondary legislation. The consultation outcome paper published in March 2025 includes the levy rate per square-metre of chargeable floorspace for works per local authority. We are reviewing the effect of the newly published BSL rates on the CLPR viability appraisal.
Policy COM2: Affordable Housing	Objects to the policy as evidence does not support 30-35% affordable housing on brownfield land	LPR-D-138	Disagree. Viability appraisal indicates that under current economic conditions some brownfield sites may need some relaxation of policy requirements. Policy COM 2 sets out mechanisms where review may be appropriate. This provides flexibility to address current economic circumstances as well as 'upward reviews' in legal agreements if circumstances change.
Policy COM2: Affordable Housing	Objects to increasing the % of affordable housing required when the council are proposing a lower overall housing requirement than in the adopted LP	LPR-D-203	Disagree. The CLPR plans for the objectively assessed needs in Cherwell in accordance with NPPF transitional arrangements. The affordable housing requirement is based on a percentage requirement to be applied on a site-by-site bases and informed by viability appraisal.
Policy COM2: Affordable Housing	Delivery of this policy for some sites is likely to be limited due to viability concerns. There should be flexibility in the policy	LPR-D-091	Disagree. The affordable housing requirement has been informed by viability appraisal and the policy text establishes what is expected when it is demonstrated that requirements cannot be met. As per NPPF advice, it is up to the applicant to justify the need for a viability assessment at application stage.
Policy COM2: Affordable Housing	There should be more allocations to meet affordable housing needs. Cherwell faces a significant need for affordable housing in the plan period	LPR-D-137 LPR-D-224	The CLPR plans for the objectively assessed needs in Cherwell in accordance with NPPF transitional arrangements. The Council provided 4,4477 new homes from 2020-2024, has land supply for another 12.525 homes and has planned for 4,400 homes to meet Oxford's needs. A total of

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
			21,402 homes. A proportion of which has been secured and will continue to be secured as affordable homes.
Policy COM2: Affordable Housing	Questions the social housing requirement	LPR-D-041	The social rent requirement is justified by Cherwell's housing need in the Affordable and Specialist Housing Needs Assessment (November 2024) and the CLPR viability assessment.
Policy COM2: Affordable Housing	Objects to the term 'affordable housing' as it is a smokescreen to avoid providing homes for social rent	LPR-D-073	Disagree. The NPPF provides the definition of affordable housing. Policy COM2 makes clear the requirement for the different tenures of affordable housing. It notes that social rented housing must be considered before affordable rent and amount to a minimum of 35% of the affordable housing requirement.
Policy COM2: Affordable Housing	Questions what defines affordable housing	LPR-D-026	The NPPF provides the definition of affordable housing, also shown in the CLPR Glossary (Appendix 10).
Policy COM2: Affordable Housing	Work needs to be done to justify the costs used. The Building Safety Levy needs to be taken into account	LPR-D-138	Noted. Section 4 and Appendix 2 of the Viability Assessment (2024) provides a detailed account of costs used. Government confirmed in March 2025 that policy proposals in their technical consultation on the Building Safety Levy (BSL) November 2022/December 2023 will be taken forward. This will require the preparation and approval of secondary legislation. The consultation outcome paper published in March 2025 includes the levy rate per square-metre of chargeable floorspace for works per local authority. We are reviewing the effect of the newly published BSL rates on the CLPR viability appraisal.
Policy COM2: Affordable Housing	Recommends increase in affordable housing and ensuring that 'affordability' is defined to ensure this is met.	LPR-D-150	Noted. Policy COM 2 affordable housing requirement was set following a viability appraisal range up to 50%. Policy COM2 prioritises the provision of social or affordable rented housing and has been informed by up-to-date evidence on housing need and viability appraisal. Policy COM 2 and supporting text provides information on how the requirement will be applied. Further information on ensuring 'affordability' can be found in the Developer Contributions Suplemmentary Planning Document, Cherwell's Housing Strategy (2025) and Cherwell Housing Allocations Scheme (2025).

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM2: Affordable Housing	There is no information on the detail about requirement or demand for First Homes, this requirement should be removed as per the 2024 NPPF	LPR-D-204	Noted. There is no requirement in the CLPR for First Homes.
Policy COM2: Affordable Housing	As per the AMR, affordable housing completions are below target and with a lower housing requirement now, this will not support affordable housing Questions the affordable housing need, as it is a very sizeable proportion of the current annual housing requirement	LPR-D-210 LPR-D-255	Disagree. The CLPR plans for the objectively assessed needs in Cherwell in accordance with NPPF transitional arrangements. The affordable housing requirement is based on a percentage requirement to be applied on a site-by-site bases and informed by viability appraisal. Whilst the Council cannot currently demonstrate a five-year housing supply, it is expected that the Council will have a positive land supply on adoption of the Plan as shown in CLPR Appendix 2 'Housing Supply and Trajectory'.
Policy COM2: Affordable Housing	Cherwell need to ensure that any affordable housing completions on sites serving Oxford City's needs are not counted towards meeting Cherwell's needs	LPR-D-221	Noted. The CLPR proposes 4,400 homes to meet Oxford's unmet needs in the 2020 Local Plan Partial Review saved allocations. The Council will monitor delivery against Oxford's unmet needs on these saved allocations until that requirement is met.
Policy COM2: Affordable Housing	A number of the saved allocations benefit from planning permission with the affordable housing mix and quantum established through the S106 agreement. Suggests text is added to address this	LPR-D-225	Disagree. The suggested text is unnecessary. Permitted development is outside the scope of Policy COM2 and will be delivered in accordance to the agreed S106 and conditions attached to the permission.
Policy COM2: Affordable Housing	Application of the policy should relate to 'net' increase in dwellings to encourage the redevelopment of existing sites. The change in threshold should be supported by viability work	LPR-D-234	Noted. Calculation of housing need, requirements and monitoring of delivery is undertaken on net figures. The policy was subject to viability appraisal.
Policy COM2: Affordable Housing	Welcomes the recognition that social rent is the only truly affordable option for many people, suggests strengthening to the	LPR-D-257	Support noted and welcomed. Improvement requested is already clearly stated within Policy COM 2.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
	wording in supporting text (paragraph 3.215)		
Policy COM2: Affordable Housing	Questions the viability for housing for older people. Suggests older persons housing should be exempted from delivering affordable housing	LPR-D-259	Disagree. The requirement for affordable older persons accommodation is justified in the Affordable and Specialist Housing Needs Assessment (November 2024) and the CLPR Viability Assessment.
Policy COM2: Affordable Housing	The 35% social rent requirement is onerous and unlikely to be viable, especially in Grey Belt sites where 50% affordable will be required	LPR-D-282	Disagree. Identified needs for residential, commercial and other development have been accommodated without the need to release further Green Belt land. The policy requirements have been justified by local housing evidence in Affordable and Specialist Housing Needs Assessment (November 2024) and tested in the viability appraisal. The policy allows for some flexibility on requirements if that it is justified at site specific level.
Policy COM2: Affordable Housing	The tenure split is not flexible and there is no justification for this so it should be removed.	LPR-D-288	Disagree. The tenure split justified by up-to-date evidence of need in Cherwell in the Affordable and Specialist Housing Needs Assessment (November 2024) and the CLPR viability assessment. Policy COM 2 sets out mechanisms where review may be appropriate. This provides flexibility to address site specific economic circumstances if justified
Policy COM2: Affordable Housing	It is unclear where the data has come to support the mix in table 4. There should be reference to the report in the evidence base	LPR-D-297	Agreed. Reference to the Affordable and Specialist Housing Needs Assessment (November 2024) is included in the list of proposed changes to the Plan.
Policy COM2: Affordable Housing	Considers it not justified to seek the provision of social rented housing before affordable rent and for the tenure to be a minimum of 35% of the affordable housing provided. Suggest the affordable housing mix is best negotiated on local information and needs. Notes inconsistency with table 4 paragraph 3.222	LPR-D-300	Disagree. The policy requirements have been justified by local housing evidence in Affordable and Specialist Housing Needs Assessment (November 2024) and tested in the viability appraisal. The policy allows for some flexibility on requirements if that it is justified at site specific level. Factual error in Table 4 has been corrected and included in the list of proposed changes to the Plan.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM2: Affordable Housing	Suggests deletion of 'at least' from the policy. Considers there is insufficient evidence to justify the percentage. Suggests amendments to the wording	LPR-D-321	Disagree. The policy requirements have been justified by local housing evidence in Affordable and Specialist Housing Needs Assessment (November 2024) and tested in the viability appraisal. The policy allows for some flexibility on requirements if that it is justified at site specific level.
Policy COM2: Affordable Housing	Questions how the policy will ensure 30% affordable housing provision can happen	LPR-D-339	Noted. Policy COM 2 and supporting text provides information on how the requirement will be applied. Further information on securing affordable housing can be found in the Developer Contributions Suplemmentary Planning Document, Cherwell's Housing Strategy (2025) and Cherwell Housing Allocations Scheme (2025).
Policy COM3: Housing Size/Type	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-297 LPR-D-327	Support noted and welcomed.
Policy COM3: Housing Size/Type	Generally supports the policy, but suggests greater flexibility is included to allow for housing size/types to be justified on viability considerations and local housing needs.	LPR-D-288	Disagree. Policy COM3 is sufficiently flexible. It indicates proposals will be expected to provide evidence responding to need, local market conditions and locational/site characteristics.
Policy COM3: Housing Size/Type	Welcomes providing an appropriate housing mix according to need but seeks these percentages are separated for social rented and affordable rented homes with both categories requiring the same percentage mix	LPR-D-257	Noted. Table 4 in paragraph 3.222 provides the mix of housing by size and type for market and affordable housing.
Policy COM3: Housing Size/Type	Recommends including a policy for community-led housing	LPR-D-256	This is covered in the Rural Areas Strategy by Policy RUR 5: Community Led Housing.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM3: Housing Size/Type	There is no clarity if the elements of this policy should be excluded from the Partial Review sites	LPR-D-251 (Oxford City Council)	Disagree. Saved LPPR (2020) policies including PR2 Housing Mix, Tenure and Size are listed in LP Appendix 1. All LPPR 2020 sites but one benefit from permission or resolution to approve. We will continue to engage with Oxford City Council to address and resolve relevant matters as we progress the CLPR to adoption and deliver the site allocations in the LPPR 2020.
Policy COM3: Housing Size/Type	Objects to the policy, and considers it is not clearly written and is ambiguous it does not provide worked examples on a mix of homes to meet needs and create socially mixed vibrant and inclusive communities.	LPR-D-258 LPR-D-300 LPR-D-320	Disagree. The Plan should be read as a whole including Policies COM 14 'Achieving Well Designed Places and COM 18 ' Creating Healthy Communities'.
Policy COM3: Housing Size/Type	Does not consider the policy to be consistent with national policy or justified as note supported by evidence on local needs for the size and types of homes.	LPR-D-050	Disagree. The mix of housing types and sizes is informed by local housing need in the Affordable and Specialist Housing Needs Assessment (November 2024) published alongside the CLPR for consultation.
Policy COM3: Housing Size/Type	Questions the anti-social behaviour/ public safety issues associated with flats	LPR-D-020	Noted. Design policies in the CLPR and the Residential Design Guide help address these matters from a planning perspective. The Council's Environmental Health department has been involved in the preparation of the CLPR.
Policy COM3: Housing Size/Type	There is an overdominance of 1/2 bed properties, which is against the HENA 2022 evidence	LPR-D-091	Noted. The Council has withdrawn the HENA from its evidence base. The mix of housing types and sizes is informed by local housing need in the Affordable and Specialist Housing Needs Assessment (November 2024).
Policy COM3: Housing Size/Type	The policy should be clearer in confirming that housing mixes should respond not only to the most up-to-date assessment of local housing needs but also the characteristics of the site and locality, evidence of demand and viability and feasibility	LPR-D-236	Disagree. Policy COM3 indicates proposals will be expected to provide evidence responding to local market conditions and locational/site characteristics.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM3: Housing Size/Type	The policy should not ignore the opportunity to provide residential accommodation close to employment and/or social and shopping activities	LPR_D-239	Noted. The sustainable location of development is addressed in other plan policies including Policy SP1 and area strategies.
Policy COM3: Housing Size/Type	There is an error in wording between 'housing mix' title and 'housing size/type' policy title	LPR-D-165	Noted. Correction of section title to match the policy title has been added to the list of proposed changes to the Plan.
Policy COM4: Specialist Housing	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy COM4: Specialist Housing	Welcomes the policy assuming there is no inconsistency with COM2	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. There is no inconsistency, Policy COM 4 supports provision of specialist housing while Policy COM2 sets affordable housing requirements including those for specialist housing.
Policy COM4: Specialist Housing	There is no clarity whether all of the elements of the policy should be excluded from the Partial Review sites. The policy includes a requirement for extra care housing which is also in COM2 which is confusing. The policy refers to C3 where it should refer to C2	LPR-D-251 (Oxford City Council)	Noted The focus of the LPR 2020 saved policies listed in LP Appendix 1 is specific to Oxford's unmet needs for self-contained dwellings. Specialist housing can fall within C2 and C3 use classes if the units can be used as independent dwellings irrespective of whether an element of care is provided. Factual correction regarding use class within Policy text and clarification to supporting text regarding saved LPPR 2020 saved policies. These are included in the list of proposed changes.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM4: Specialist Housing	Policy should apply to all housing sites when there is an element of specialist housing. Objects to the policy unless it is amended to require a Health Impact Assessment and agree provision with the ICB if onsite healthcare will provide NHS GP services.	LPR-D-272 (BOB-ICB)	Disagree. The Plan should be read as a whole, Policy COM 18 requires all major developments to be supported by a Health Impact Assessment. Policy COM 17 requires the provision, extension and colocation of health facilities to be informed by discussion with health providers. Health care provided at residential institutions for extra care of residents and any interrelationship with NHS health provision is a matter for the NHS providers' contractual obligations such as registering of patients, patients visits outside practice premises and level of care. The policy does not preclude provision of an element of specialist housing being provided as part of housing sites. Minor editorial amendments are listed in the Proposed Changes to make this clear.
Policy COM4: Specialist Housing	Fully supports the focus regarding extra care units within the overall housing mix, however saved allocation sites with planning permission should not be required to provide specialist housing in addition to what they already have permission for. Suggests amendments to the text	LPR-D-225	Support noted and welcomed. The suggested text is unnecessary. Permitted development is outside the scope of Policy COM2 and will be delivered in accordance with the agreed S106 and conditions attached to the permission.
Policy COM4: Specialist Housing	Welcomes the inclusion in the supporting text to the number of homes that are required to meet the specialist housing needs of the community. Suggests the council identifies and allocated self-contained sites that could contribute towards meeting these needs	LPR-D-262 LPR-D-263	Support noted and welcomed. The CLPR plans for the objectively assessed needs in Cherwell in accordance with NPPF transitional arrangements. The policy supports the provision of an element of specialist housing being provided as part of housing sites and standalone specialist housing proposals. Minor editorial amendments are included in the list of proposed changes to the Plan to make this clear.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM4: Specialist Housing	Objects to the policy as it is not clearly written and is ambiguous. Regarding the 400 dwellings, there should be an assessment of need and deliverability	LPR-D-258 LPR-D-300 LPR-D-320	Disagree. The policy supports the provision of an element of specialist housing being provided as part of housing sites and standalone specialist housing proposals. Minor editorial amendments are included in the list of proposed changes to the Plan to make this clear. The Policy has been informed by viability appraisal.
Policy COM4: Specialist Housing	The policy is overly restrictive, suggests it should be more flexible regarding the requirement for housing sites of 400 dwellings and above.	LPR-D-165	Disagree. On sites of 400 dwellings and above there is flexibility on the proportion of units to be provided and subject to agreement alternative specialist housing could be provided.
Policy COM4: Specialist Housing	Questions including downsizing for older people	LPR-D-041	Noted. Managing potential under occupancy is an important area of Council policy covered in Cherwell's Housing Strategy 2025. The CLPR supports this and other strategies by planning for a mix of housing sizes and types that meet identified local needs.
Policy COM4: Specialist Housing	Does not believe the policy will actually see the delivery of the numbers of specialist housing required and suggests there should be stronger emphasis and flexibility to ensure smaller and standalone sites will be supported to deliver specialist housing	LPR-D-091	Disagree. The policy supports the provision of an element of specialist housing being provided as part of housing sites and standalone specialist housing proposals. On sites of 400 dwellings and above there is flexibility on the proportion of units to be provided and subject to agreement, alternative specialist housing could be provided. Minor editorial amendments are included in the list of proposed changes to the Plan to make this clear. The Policy has been informed by viability appraisal.
Policy COM4: Specialist Housing	The policy imposes specific requirements on large developments which could be restrictive if viability challenges or other site constraints arise	LPR-D-214	Disagree. The policy supports the provision of an element of specialist housing being provided as part of housing sites and standalone specialist housing proposals. On sites of 400 dwellings and above there is flexibility on the proportion of units to be provided and subject to agreement, alternative specialist housing could be provided. Minor editorial amendments are included in the list of proposed changes to the Plan to make this clear. The Policy has been informed by viability appraisal.
Policy COM4: Specialist Housing	Specialist housing needs should be included in the policy text to align with census data and OCC Specialist and Supported Housing Needs Assessment	LPR-D-259	Disagree. OCC's Specialist and Supported Housing Needs Assessment and Cherwell's need is listed in the supporting text to Policy COM 4.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM5: Residential Space Standards	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-165	Support noted and welcomed.
Policy COM5: Residential Space Standards	Supports the external residential space section. Requests clarity on the percentage for M4(2) standards and M4(3) dwellings	LPR-D-297	Noted. Amendments providing greater clarity are included in the list of proposed changes to the Plan.
Policy COM5: Residential Space Standards	Objects to the policy as is not clearly written and is ambiguous. No explanation of M4(s) building regulations standards is encouraged	LPR-D-258 LPR-D-300 LPR-D-320	Noted. Amendments providing greater clarity are included in the list of proposed changes to the Plan.
Policy COM5: Residential Space Standards	Does not consider the 10% requirement for M4(3) to be justified. The policy needs to be amended	LPR-D-138 LPR-D-262 LPR-D-263 LPR-D-050	Cherwell's Affordable and Specialist Housing Needs Assessment (December 2024) provides clear evidence justifying the delivery of 'accessible and adaptable' homes. It recommends all dwellings to meet M4(2) standards and 10%+ of homes to meet M4(3) standards. The Policy has been subject to viability appraisal.
Policy COM5: Residential Space Standards	M4(3) standards will increase costs and give the buildings a limited market reducing price and availability. Suggests the requirement only applies to affordable and older persons housing, not market	LPR-D-094	Disagree. Those with a disability or long-term health problem may continue to live at home with family, independently or choose to move to supported housing. Increased cost has been accounted for in the CLPR viability appraisal.
Policy COM5: Residential Space Standards	The policy should be re-worded to clarify that the internal and external space standards will not be applied to the conversion of existing buildings. Suggests rewording by including ' 'unless special circumstances pertain'.	LPR-D-234	Disagree. The change is unnecessary. It applies to works to existing buildings, but the extent to which requirements must be complied with will depend on the type of building and the works that are being carried out.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM5: Residential Space Standards	Questions the evidence to justify the policy's requirements for outdoor amenity space. Considers this requirement should be removed	LPR-D-050	Disagree. Policy COM 5 does not set a specific outdoor amenity standard but sets design requirements on amenity space to support health and well-being. This is supported by NPPF requirements for plan and decision making on provision of a high standard of amenity for existing and future users. The Policy is not prescriptive on the form or size of the amenity space.
Policy COM6: Self-Build and Custom-Build Housing	Supports the policy	LPR-D-297	Support noted and welcomed.
Policy COM6: Self-Build and Custom-Build Housing	Supports the policy, subject to the retention of the clause that allows for the release of the site for market housing if plots have not sold and there is unlikely to be interest in the plots after an appropriate marketing period	LPR-D-134 LPR-D-301	Support noted and welcomed.
Policy COM6: Self-Build and Custom-Build Housing	Supports a specific policy on self and custom build housing but recommends it remains flexible to aid delivery	LPR-D-091	Support noted and welcomed. The aim of the policy is to support a diverse housing market and housing choice. Amendments to encourage rather than prescribe a percentage of Self-build and Custom Build on sites of 100 units or more are included in the list of proposed changes to the Plan.
Policy COM6: Self-Build and Custom-Build Housing	It is unclear if the policy applies to sites linked to the 2031 plan. This should be made clear.	LPR-D-251 (Oxford City Council)	All LPPR 2020 sites but one benefit from permission or resolution to approve. We will continue to engage with Oxford City Council to address and resolve relevant matters as we progress the CLPR to adoption and deliver the site allocations in the LPPR 2020.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM6: Self-Build and Custom-Build Housing	Object that large scale major residential developments will be required to provide 5% of the residential units for self-build homes due to a lack of evidence. Self-build should focus on identifying specific sites rather than including it as part of other sites delivering market and affordable housing. Self-build should not be prioritised above efficient delivery of housing, suggests improvements.	LPR-D-258 LPR-D-300 LPR-D-320 LPR-D-262 LPR-D-263 LPR-D-301 LPR-D-165 LPR-D-225 LPR-D-227 LPR-D-236 LPR-D-237 LPR-D-288 LPR-D-211	Agree. The aim of the policy is to support a diverse housing market and housing choice. Amendments to encourage rather than prescribe a percentage of Self-build and Custom Build on sites of 100 units or more are included in the list of proposed changes to the Plan.
Policy COM6: Self-Build and Custom-Build Housing	Considers the policy should be flexible and provide for plots as either self-build or custom-build.	LPR-D-050	Disagree. The policy enables that flexibility by noting 'Proposals for custom and self- build…'.
Policy COM6: Self-Build and Custom-Build Housing	Marketing times should be clearly defined Reference to a 12-month timeframe for the plots to be made available and marketed is encouraged	LPR-D-211 LPR-D-214 LPR-D-165 LPR-D-50	Noted. Consider that application stage is the appropriate stage to define the marking time.
Policy COM6: Self-Build and Custom-Build Housing	The policy should be amended to allow for new self-build plots on the edge of the built-up limits of Category A/B settlements	LPR-D-234	Disagree. The suitability of a development location is assessed against other policies in the CLPR including Policy SP 1 Settlement Hierarchy.
Policy COM6: Self-Build and Custom-Build Housing	Recommends the policy is strengthened to provide more support for affordable Custom and Self-Build Housing through RPS/Community Groups	LPR-D-256	Disagree. The aim of the policy is to support delivery of self-build and custom build housing. Proposals can deliver affordable housing provided is consistent with NPPF definitions and local plan policies. Grant funding is available for certain form of affordable housing.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM6: Self-Build and Custom-Build Housing	Questions the viability of self-build housing	LPR-D-321	Disagree. CLPR policies including Policy COM 6 are informed by viability appraisal.
Policy COM7: Sub-Division of Dwellings and Homes in Multiple Occupation	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy COM7: Sub-Division of Dwellings and Homes in Multiple Occupation	Encourages reference to heritage significance as a consideration in the sub-division of historic buildings	LPR-D-274 (Historic England)	Agree. Supporting text highlighting heritage significance as a consideration in subdivision of historic buildings is included in the list of proposed changes to the Plan..
Policy COM7: Sub-Division of Dwellings and Homes in Multiple Occupation	Suggests a reference to Kidlington in the text	LPR-D-282	Disagree. Higher levels of sub-division is a matter that affects all Cherwell's urban areas as noted in the supporting text to Policy COM 7.
Policy COM7: Sub-Division of Dwellings and Homes in Multiple Occupation	The policy should state planning permission will be granted where there is no demonstrable harm to the amenities or privacy of neighbours. Reasonable alterations and extensions to allow for such changes of use should be allowed. The policy should be reworded as such	LPR-D-234	Disagree. The change is unnecessary. The policy supports subdivision of dwellings and HMOs subject to addressing matters including amenity, privacy and parking standards.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM8: Residential Caravans	No comments were received on this policy	-	N/A
Policy COM9: Travelling Communities	Supports the policy	LPR-D-290 (West Oxfordshire District Council)	Support noted and welcomed.
Policy COM9: Travelling Communities	Suggests amendments to specify exclusion of sites where there would be an impact to the nearby settlement, its character and landscape.	LPR-D-257 (CPRE)	Disagree. The Plan should be read as a whole; the suggested amendments are addressed by the application of other plan policies including Policies COM 10 on protection and enhancement of landscape and COM 14 on achieving well designed places. Policy COM 9 criteria vi addresses potential harm to historic and natural environment.
Policy COM10: Protection and Enhancement of the Landscape	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-095 (Drayton Parish Council) LPR-D-160 LPR-D-161 LPR-D-240 (Fritwell Parish Council) LPR-D-344 (Hanwell Parish Council)	Support noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM10: Protection and Enhancement of the Landscape	Supports how the Cotswolds National Landscape is addressed in the policy	LPR-D-195	Support noted and welcomed.
Policy COM10: Protection and Enhancement of the Landscape	Suggests the text is amended from 'reduce' to 'harm'	LPR-D-274 (Historic England)	Agree. Suggested amendment is included in the list of proposed changes to the Plan.
Policy COM10: Protection and Enhancement of the Landscape	Supports the policy and suggests amendments regarding tree planting and landscaping schemes due to the potential impact on historic environment assets	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. The suggested changes are considered unnecessary. The policy includes criteria to prevent harm to landmark features and historic significance. The Plan should be read as a whole including consideration of Policies COM 14 on achieving well designed places and COM 26 on the historic environment.
Policy COM10: Protection and Enhancement of the Landscape	Objects to the requirement for all major development proposals to be accompanied by a Landscape and Visual Impact Assessment.	LPR-D-221 LPR-D-316	Disagree. Policy COM 10 is consistent with the NPPF and justified by evidence and Sustainability Appraisal. Landscape and Visual Impact Assessments are necessary to identify, assess and address the potential impact of proposals on landscape and visual character.
Policy COM10: Protection and Enhancement of the Landscape	Objects to point iv which cites that causing coalescence between settlements is a potential reason for not permitting development	LPR-D-321 LPR-D-322	Disagree. Landscape elements/characteristics can have a role in preserving visual and/or physical settlement separation and identity. It is appropriate that coalescence is a consideration within this policy.
Policy COM10: Protection and Enhancement of the Landscape	Compliance with the policy is impossible as any built development will to some extent result in a change to local character	LPR-D-309	Disagree. Development should be sympathetic to its landscape setting. The policy objective is to achieve a balance between development needs and environmental objectives.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM10: Protection and Enhancement of the Landscape	The NPPF only seeks to protect and enhance "valued" landscapes. It should be recognised that the council's landscape character assessment is likely to be updated over the plan period. The Cotswolds AONB Management Plan should be examined	LPR-D-221	Disagree. Additional to 'valued landscapes' in NPPF 23 paragraph 180, the Framework requires policies and development proposals to address landscape protection and enhancement including in paragraphs 20 and 135. It is inappropriate to examine the Cotswolds National Landscape Management Plan as part of the CLPR examination. The Cotswolds National Landscape Board is responsible for preparing and publishing the Management Plan including formal consultation during that process. The Plan was adopted on 25 February 2025.
Policy COM10: Protection and Enhancement of the Landscape	Would like landscaping to protected against wind and solar farms	LPR-D-095 (Drayton Parish Council)	Noted. Landscape and visual impact is addressed when considering energy proposals.
Policy COM10: Protection and Enhancement of the Landscape	The inclusion of figure 5 is unnecessary and misleading. Evidence base documents that use the CPRE 2007 Tranquillity Map are flawed and refers to more up to date evidence: Natural England's Light Pollution and Dark Skies map (2016). Suggests changes to wording and corrections.	LPR-D-210	Disagree. Dark skies and light pollution are some of the contributing factors to 'tranquillity' but don't cover tranquillity in its entirety. Consultants preparing the landscape evidence use careful professional judgment to ensure that relative tranquillity takes account of local factors and character to provide a reliable baseline to inform decisions on landscape. Only 19 of the 24 landscape types in the OWLS study are present in Cherwell. Suggestion to add cross reference to figure 5 rather than include it in the supporting text to the policy is noted. Minor editorial amendments can be addressed following the CLPR's examination.
Policy COM10: Protection and Enhancement of the Landscape	Several criteria are expressed in absolute terms without any consideration allowed for the extent to which any degree of harm would be acceptable/unacceptable. Reference to 'preservation' of all landscapes should be removed and replaced with NPPF consistent wording. Suggests other amendments to the text	LPR-D-229	Disagree. NPPF requires policies and development proposals to address landscape protection and enhancement. The extent of conflict, the resulting impacts, and the weight that should be attributed to the policies in any planning balance exercise is a matter for decision making. The policy does not apply absolute terms, it identifies how development should preserve landscape character.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM11: Cherwell Local Landscape Designations	Supports the policy	LPR-D-302 (Oxfordshire County Council) LPR-D-271 (Kirtlington Parish Council) LPR-D-083 (Banbury Town Council) LPR-D-161	Support noted and welcomed.
Policy COM11: Cherwell Local Landscape Designations	Objects to the policy as it duplicates COM10 and fails to recognise the blanket approach taken to the identification of local landscape designations and opportunities for development. The policy should be deleted The designations provide an unwarranted level of additional constraint The policy proposed covers much of the district and asks that justification for this is explored through the examination process	LPR-D-221 LPR-D-227 LPR-D-234	Disagree. Policy COM 11 is distinct from Policy COM 10 and is consistent with the NPPF including the requirement for plans to distinguish between the hierarchy of international, national and locally designated sites. The Policy is informed by landscape evidence which justifies the proposed local designations following an assessment of landscape characteristics considered to be of 'above ordinary' value. Policy COM 11 and its supporting evidence identify the attributes and qualities of the areas within the proposed local designations. Providing clarity for those developing proposals and for decision making.
Policy COM11: Cherwell Local Landscape Designations	In policies COM11 and COM26-29 different landscape studies are referred to, which may result in confusion. Each policy should refer to the same study, or clarify which is relevant	LPR-D-100 LPR-D-257	The Plan should be read as a whole. Policies COM 26 to COM 29 are heritage/historic environment specific and reference is made to their main evidence base.
Policy COM11: Cherwell Local Landscape Designations	Contrary to the reference in the policy, the proposed local landscape designations are not identified clearly on the legend for the policy map. These should be clearly identified	LPR-D-298	The proposed landscape designations are identified in the Policies Map. Editorial improvements to make the Policies Map clearer are listed in the Proposed Changes.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM12: The Oxford Green Belt	Supports the policy	LPR-D-274 (Historic England) LPR-D-256 LPR-D-206	Support noted and welcomed.
Policy COM12: The Oxford Green Belt	Supports the policy and the gap between Oxford and Kidlington	LPR-D-206	Support noted and welcomed.
Policy COM12: The Oxford Green Belt	Supports decision not to allocate further land in the Green Belt	LPR-D-338	Support noted and welcomed.
Policy COM12: The Oxford Green Belt	Objects that the Oxford Airport is within the Green Belt, requests its removal	LPR-D-293	Disagree. Identified needs for residential, commercial and other development have been accommodated without the need to release further Green Belt land. London Oxford Airport benefits from permitted development rights for airport related development on its operational land. Policy KID 2 supports the continued use of LOA for commercial aviation and ancillary uses and guides proposals affecting the airport's operations.
Policy COM12: The Oxford Green Belt	The policy should refer to Grey Belt as per the 2024 NPPF	LPR-D-223	Disagree, Under the transitional arrangements, the Local Plan is to be examined against the December 2023 NPPF.
Policy COM12: The Oxford Green Belt	Questions why a comprehensive Green Belt Review hasn't been undertaken	LPR-D-268	The CLPR strategy meets identified needs for residential, commercial and other development without the need to release further Green Belt land.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM12: The Oxford Green Belt	The policy refers to preventing coalescence which is helpful	LPR-D-256	Noted.
Policy COM13: Settlement Gaps	Supports the policy and suggest minor editorial amendment to criteria iii.	LPR-D-274 (Historic England)	Support noted and welcomed. Minor editorial improvements can be addressed following the CLPR's examination.
Policy COM13: Settlement Gaps	Supports the policy and notes some gaps may have been lost or severely infringes. Roads and employment can be intrusive and affect the perception of a gap. It is important that site allocations take account of the characteristics of the gaps	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. The matters noted have been fully assessed in the Green Gaps Study 2024. Land that, in accordance to the study, no longer perform a settlement separation function have not taken forward to CLPR Appendix 4. Comment on allocations noted, key characteristics and guidance in CLPR Appendix 4 will be applied as per Policy COM 13 requirements.
Policy COM13: Settlement Gaps	Supports the policy and suggests the use of one single term to refer to the gaps to avoid confusion. Propose word amendments and additional criteria to the Heyford-Caulcott gap, the Banbury - Hanwell gap Propose the extension of the Heyford - Ardley and Fewcott gap and the Banbury – Adderbury and Twyford	LPR-D-21 LPR-D-113 LPR-D-126 (Mid-Cherwell NP Forum) LPR-D-344 (Hanwell Parish Council)	Support noted and welcomed. Minor amendments to supporting text to improve clarity can be addressed following the CLPR's examination. Disagree with the proposed amendments which stray beyond the purpose of the policy and its supporting evidence.
Policy COM13: Settlement Gaps	Supports the policy and appendix 4.	LPR-D-343 (West Northamptonshire Council)	Support noted and welcomed.
Policy COM13: Settlement Gaps	Support the policy and Appendix 4 and considers it consistent with the emerging Mid Cherwell NP but would wish to see	LPR-D-201 (Middleton Stoney Parish Council)	Support noted and welcomed. Disagree with the intent to prevent development as contrary to the intention of the policy and its evidence.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
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	them strengthened to prevent development in those areas.		
Policy COM13: Settlement Gaps	Supports the policy, suggests supporting text to the Policy should address perception of coalescence. Coalescence can occur when development is screened.	LPR-D-160	Support noted and welcomed. This matter is addressed comprehensively in the Green Gaps study 2024 and the key characteristics and guidance in CLPR Appendix 4. Minor changes for factual improvements can be addressed following the CLPR's examination.
Policy COM13: Settlement Gaps	Supports the policy but a more detailed criteria is needed to provide assurance/protection to the villages	LPR-D-256 LPR-D-271 (Kirtlington Parish Council)	Support noted and welcomed. Disagree that more detailed criteria is needed. Policy COM 13 and supporting evidence are proportionate and directly relevant to the CLPR strategy, and the issues addressed in the plan. The Plan should be read as a whole including Policy SP1 Settlement Hierarchy.
Policy COM13: Settlement Gaps	Acknowledges it is intended as a permissive policy that will still allow suitable development to come forward in settlement Gaps. It suggests a minor editorial improvement.	LPR-D-316	Noted. Minor editorial amendment is included in the list of proposed changes to the Plan.
Policy COM13: Settlement Gaps	There is inconsistency in the strategic gaps 'key characteristics' between Bicester and Ambrosden due to BIC E5	LPR-D-152	Noted. Factual correction is included in the list of proposed changes to the Plan.
Policy COM13: Settlement Gaps	Notes concern regarding the policy. Considers Strategic Gaps should prevent all development including managed green spaces and that gaps should require noise and light pollution buffers	LPR-D-012 LPR-D-047	Disagree. The proposed amendments stray beyond the purpose of the policy and its supporting evidence.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM13: Settlement Gaps	Supports the policy	LPR-D-062 LPR-D-083 (Banbury Town Council) LPR-D-095 (Drayton Parish Council) LPR-D-103 (Bourtons Parish Council) LPR-D-135 (Caversfield Parish Council) LPR-D-160 LPR-D-161 (Islip Parish Council) LPR-D-186 LPR-D-201 (Middleton Stoney Parish Council) LPR-D-209 LPR-D-240 (Fritwell Parish Council) LPR-D-271 (Kirtlington Parish Council) LPR-D-292 (Launton Parish Council)	Support noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM13: Settlement Gaps	The EWR project potentially interfaces with a number of the Bicester gaps. While EWR Co will seek to address potential impacts, the EWR Project should override any relatively small-scale localised impacts.	LPR-D-243	Noted. The extent of conflict, the resulting impacts, and the weight that should be attributed to the policies in any planning balance exercise is a matter for decision making.
Policy COM13: Settlement Gaps	Suggests it should be made clear that the mapping shows villages into West Northamptonshire by way of identifying the strategic gap and does not seek to impose policies on the bordering	LPR-D-257	Noted. Guidance in Appendix 4 is explicitly worded to address development proposals within Cherwell. Exclusion of land in West Northamptonshire from Appendix 4 maps is included in the list of proposed changes to the Plan.
Policy COM13: Settlement Gaps	There should be a clear and unambiguous definition of the strategic gap between Bucknell and any new development preventing provision of development green requirements and addressing noise and pollution.	LPR-D-012 LPR-D-022 LPR-D-023 LPR-D-025 LPR-D-123 LPR-D-119	Disagree. The proposed amendments stray beyond the purpose of the policy and its supporting evidence.
Policy COM13: Settlement Gaps	The language in the policy is too vague, suggests amendments to the wording with 'must' and 'should'. Suggests delivery of development obligations within the gap should be prevented.	LPR-D-260 (Bucknell Parish Council)	Disagree. The proposed amendments stray beyond the purpose of the policy and its supporting evidence.
Policy COM13: Settlement Gaps	Commends the approach but suggests in relation to the Bicester - Bucknell gap strengthening the wording in relation to intervisibility and preventing the delivery of development obligations within the gap.	LPR-D-339	Disagree. The proposed amendments stray beyond the purpose of the policy and its supporting evidence.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM13: Settlement Gaps	Suggests alterations to the proposed Banbury - Adderbury and Twyford gap.	LPR-D-227	Disagree. Review submitted with the representation concludes that Policy COM 13 does not preclude development within the land in question. Policy COM 10 and Policy COM 11 address the value of landscape. Policy COM 13 and associated Appendix 4 is distinct from landscape policies.
Policy COM13: Settlement Gaps	Suggests alterations to the proposed Bicester - Bicester - Bucknell (NW Bicester) and Bicester -Middleton Stoney gaps.	LPR-D-266	Disagree. Review submitted with the representation seems to indicate that Policy COM 13 does not preclude development within the land in question.
Policy COM13: Settlement Gaps	The strategic gap between Adderbury and Bloxham should be extended to provide visual screening for Bloxham.	LPR-D-332	Disagree. The proposed amendments seem to stray beyond the purpose of the policy and its supporting evidence.
Policy COM13: Settlement Gaps	The policy is unsound as it is not consistent with national policy and is not justified.	LPR-D-054 LPR-D-138 LPR-D-211 LPR-D-227 LPR-D-229 LPR-D-234 LPR-D-258 LPR-D-262 LPR-D-263 LPR-D-320 LPR-D-322 LPR-D-298 LPR-D-299 LPR-D-300 LPR-D-229	Disagree. Policy COM 13 is a positively prepared criteria-based policy introduced following the CLPR establishing its strategy to meet objectively assessed needs to 2042. It is justified by evidence (Green Gaps Study 2024) and Sustainability Appraisal. The concept of 'settlement gaps' is consistent with the NPPF overarching environmental and sustainable development objectives. Policy COM 10 and Policy COM 11 address the value of landscape. Policy COM 13 and associated Appendix 4 is distinct from landscape policies. It addresses the role of landscape in maintaining the separation of settlements.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM13: Settlement Gaps	Suggested amendments to the guidance for the Banbury - Williamscot and Chacombe gap amended in line with Inspector directions in the LP 2015	LPR-D-257	Disagree. The proposed gap is justified by up-to-date evidence specific to the CLPR .
Policy COM13: Settlement Gaps	Welcomes the Heyford Park- Caulcott strategic gap but notes concern that the definition should be stronger to make it more defensible. Objects to the B4030 having a boundary role	LPR-D-113	Disagree. The proposed amendments stray beyond the purpose of the policy and its supporting evidence.
Policy COM13: Settlement Gaps	Suggests extending gap one field south of Adderbury to the Bloxham Road to address Milton and environs.	LPR-D-021	Disagree. The proposed amendments stray beyond the purpose of the policy and its supporting evidence.
Policy COM13: Settlement Gaps	Objects to the policy including land in West Northamptonshire	LPR-D-138 LPR-D-203	Noted. West Northamptonshire Council supports Policy COM 13 and Appendix 4. Guidance in Appendix 4 is explicitly worded to address development proposals within Cherwell. Exclusion of land in West Northamptonshire from Appendix 4 maps is included in the list of proposed changes to the Plan.
Policy COM13: Settlement Gaps	Query exclusion of Islip and Kidlington.	LPR-D-161 (Islip Parish Council) LPR-D-282	Disagree. Policy COM 13 does not duplicate Green Belt Policy which already performs the function of preventing settlement coalescence.
Policy COM13: Settlement Gaps	The policy duplicates heritage protection in Policy COM 26. Suggest the removal of the former airfield and Flying Field given the built form and commercial uses as confirmed by the 2022 planning approval.	LPR-D-210	Disagree. The extent of the proposed gap and proposed key characteristics and guidance is justified within the Green Gaps study having had regard to the approved masterplan for Heyford Park. Policy COM 26 addresses special character and significance of heritage assets. Policy COM 13 and associated Appendix 4 is distinct from heritage policies.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM13: Settlement Gaps	Objects to the policy as it is covered by landscape policies including COM 10	LPR-D-136 LPR-D-190 LPR-D-226	Disagree. Policy COM 10 and Policy COM 11 address the value of landscape. Policy COM 13 and associated Appendix 4 is distinct from landscape policies. It addresses the role of landscape in maintaining the separation of settlements.
Policy COM13: Settlement Gaps	Objects as it creates uncertainties and suggests a criteria-led policy instead. Raises particular concern with the Hanwell gap	LPR-D-248	Disagree. Policy COM 13 is a criteria-based policy. The land identified for each gap is necessary to apply locally specific guidance based on the key characteristics of each gap.
Policy COM13: Settlement Gaps	Objects due to the omission of strategic gaps from the draft policies map. The plan does not provide a map/figure that presents the comprehensive cumulative extent of the proposed strategic gaps	LPR-D-203	Disagree. Appendix 4 shows the extend of the gap alongside the key characteristics and guidance which will apply. Appendix 4 is clearly referenced within the policy wording. Policy COM 13 is not a preventative policy. Development is assessed against Appendix 4 guidance on the basis of the specific context where is proposed and this is locally distinct for each gap. There is no cumulative effect applied as consequence of the policy.
Policy COM13: Settlement Gaps	The settlement gap boundaries should be identified on the policies map.	LPR-D-243 LPR-D-253 LPR-D-211	Disagree. Appendix 4 shows the extend of the gap alongside the key characteristics and guidance which will apply. Appendix 4 is clearly referenced within the policy wording.
Policy COM13: Settlement Gaps	Objects to the settlement gap between Bicester and Stratton Audley and proposes amendments to Appendix 4 guidance.	LPR-D-265	Disagree. Green Gaps Study informing Appendix 4 has considered committed development including forth coming development at former RAF Bicester.
Policy COM13: Settlement Gaps	Objects to the Banbury-Bloxham gap on account of permitted development at Ell's Lane.	LPR-D-091	Disagree. Green Gaps Study informing Appendix 4 has considered committed development at Ell's Lane.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM14: Achieving Well-Designed Places	Supports the policy	LPR-D-274 (Historic England) LPR-D-083 (Banbury Town Council) LPR-D-161 (Islip Parish Council) LPR-D-165	Support noted and welcomed.
Policy COM14: Achieving Well-Designed Places	Supports the policy, particularly the reference to adopting principles of 20-minute neighbourhoods. Supports inclusion of 'microclimate' in the policy wording. Suggest improvements including reference to Natural England's Green Infrastructure Framework and the emerging Oxfordshire LNRS	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. Cherwell's GBI Strategy builds on the Natural England Framework and provides specific guidance for tree planting as part of GBI principles for incorporation into new development. Policy CSD 15 on Green and Blue Infrastructure sets out development requirements including tree planting. Oxfordshire LNRS is covered under the nature conservation policies.
Policy COM14: Achieving Well-Designed Places	Supports the policy but questions the weight of Neighbourhood Plans to design codes	LPR-D-256	The comments are noted. In relation to the points raised in relation to management and maintenance we are proposing the provision of an additional bullet point. To also note that another policy in the Local Plan, Policy COM24 that requires the submission of maintenance plans in relation to management and long term management. Para 2 of the policy details of national and local guidance developers need to take account of.
Policy COM14: Achieving Well-Designed Places	Objects to bullet xvi and suggests its deletion as supporting the use of locally sourced materials with consideration to embodied materials is not considered to be directly related to the principles of the policy	LPR-D-321	The comments are noted. Disagree with the deletion of bullet point xvi and we consider the bullet point to be sufficiently flexible as it includes the text "wherever possible"

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM14: Achieving Well-Designed Places	Recommends the policy is updated to include reference to Sport England's Active Design Document	LPR-D-191	The comments are noted. Some proposed changes for an additional bullet point are proposed to be added to reference Sport England. Sport England as a statutory consultee can advise an applicant at pre application and planning application stage/s for applicants to refer to the Sport England website and any related documentation.
Policy COM14: Achieving Well-Designed Places	There is repetition of other policies	LPR-D-165	The comments are noted.
Policy COM14: Achieving Well-Designed Places	Questions the effectiveness of the policy as it lacks flexibility. Objects to the requirement to prepare masterplans and design codes for major developments in collaboration with the council and other stakeholders	LPR-D-221	The comments are noted. Disagree with the comments. It is considered that the policy will be effective in order to ensure and achieve high quality designed developments, and this is supported in national policy and guidance.
Policy COM14: Achieving Well-Designed Places	The policy is unclear	LPR-D-223	We note the comments. We disagree as this policy is a useful addition to the Local Plan and it allows for flexibility. In terms of the principles of the 20-minute Neighbourhoods the policy states "where appropriate" and in terms of the use of locally sourced sustainable materials the policy states "where possible".
Policy COM14: Achieving Well-Designed Places	The policy adds little to NPPF policies	LPR-D-234	The comments are noted. Disagree as the policy accords with and complements the NPPF including in Chapter 12 and we consider it adds further detail in order to deliver high-quality well-designed places.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM14: Achieving Well-Designed Places	It is not sound or achievable. It is impossible for all new development to achieve secured by design accreditation. Suggests amendments to the wording	LPR-D-241	The comments are noted. The bullet point xiv. is a useful addition to the Local Plan and is considered to allow sufficient flexibility. Secured by Design (SBD) is a nationally recognised police security initiative that seeks to ensure safety and to reduce opportunities for crime.
Policy COM14: Achieving Well-Designed Places	The policy is lengthy, and not all development can adopt 20-minute neighbourhood principles and use locally sourced sustainable materials	LPR-D-257 LPR-D-300 LPR-D-320	We note the comments. We disagree this policy is a useful addition to the Local Plan, and it allows for flexibility. In terms of the principles of the 20-minute Neighbourhoods the policy states, "where appropriate" and in terms of the use of locally sourced sustainable materials the policy states "where possible".
Policy COM14: Achieving Well-Designed Places	The policy is lengthy and there is possibility for overlap with other parts of the plan. There should be reference to support for and the use of developer led design guides	LPR-D-262 LPR-D-263	We note the comments. We disagree with some of the comments, we consider that the policy is clear and will clearly inform future decision making. To note this Local Plan was prepared under the 2023 NPPF. In relation to developer led design guides we have proposed some additional text to Policy COM14.
Policy COM14: Achieving Well-Designed Places	The requirement to prepare design codes and masterplans has an unreasonable effect on viability and the deliverability of small-scale housing	LPR-D-050	Good design should be fundamental to all proposals. The policy only requires masterplans and design codes for major developments.
Policy COM15: Active Travel-Walking and Cycling	Support the policy	LPR-D-302 (Oxfordshire County Council) LPR-D-083 (Banbury Town Council) LPR-D-282	Support noted and welcomed.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM15: Active Travel- Walking and Cycling	General support but suggests amendments regarding realignment of PRoWs	LPR-D-321	Disagree. NPPF requires plan policies and decisions to protect and enhance PRoW. Changes to PRoW need to meet certain legal tests under the Highways Act 1980. Planning balance will apply to address development needs and other plan objectives.
Policy COM15: Active Travel- Walking and Cycling	The policy should be enforced more	LPR-D-041	Noted.
Policy COM15: Active Travel- Walking and Cycling	It is presumed the requirement does not apply to existing allocations carried from the previous Local Plan. Requests deletion of paragraph v	LPR-D-094	Permitted development is outside the scope of Policy COM 15 and will be delivered in accordance with the agreed S106 and conditions attached to the permission.
Policy COM15: Active Travel- Walking and Cycling	Broadly Supports the policy. Query how the policy links to other policies in the plan. Suggests wording amendments to criteria iv and vi	LPR-D-222	Partly agree. Improvements to the wording for clarity are included in the list of proposed changes. Addressing 'road danger' to create environmental where everyone feels safe is a key element of Oxfordshire's Local Transport and Connectivity Plan road safety vision (Vision Zero).
Policy COM15: Active Travel- Walking and Cycling	Criteria vii should be removed, where works are identified in LCWIPs and are necessary to support planned development they should be included as part of the IDP. Criteria viii should be removed or reworded. The Oxfordshire County Council parking standards and design guidance should be critically applied	LPR-D-316	Disagree. LCWIP schemes are included in the Infrastructure Delivery Plan. Development contributions are sought in compliance with the NPPF and CIL Regulations planning obligations tests. The application of parking standards will respond to the transport and movement objectives in the Plan and to the location and type of development proposed. Planning balance is applied at decision making stage.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM16: Public Rights of Way	Support the policy	LPR-D-302 (Oxfordshire County Council) LPR-D-161 (Islip Parish Council)	Support noted and welcomed.
Policy COM16: Public Rights of Way	The plan should indicate what measures will be taken to ensure PRoWs remain safe, secure and available	LPR-D-239	Disagree. OCC is the responsible authority for PRoWs including their maintenance in collaboration with stakeholders including landowners. Supporting text to Policy COM 16 cross refers to OCC's Rights and Way Management and Improvement Plans for more detail on maintenance and improvements.
Policy COM16: Public Rights of Way	The policy sets out an exceptional circumstances test that is not warranted. There is not justification to apply a stricter policy	LPR-D-278	Disagree. NPPF requires plan policies and decisions to protect and enhance PRoW. Changes to PRoW need to meet certain legal tests under the Highways Act 1980. Policy COM 16 does not apply a set of exceptional circumstances; it reflects the importance awarded to PRoW in national guidance and legislation.
Policy COM17: Health Facilities	Supports the policy	LPR-D-302 (Oxfordshire County Council) LPR-D-218 LPR-D-262	Support is noted and welcomed.
Policy COM17: Health Facilities	Object to the policy unless it is amended to include text proposed. Supports the dedicated policy and welcomes the concept of co-location but states the policy does not make clear how this can be achieved	LPR-D-272 (BOB-ICB)	Support is noted and welcomed. We agree with some of the suggestions and we have proposed some changes in the interests of improvement and clarification. We will not state the name of specific organisations as the names and structures of organisations may change over the Local Plan period. Developers will need to mitigate their impact but there will need to be some aspects of funding from future statutory health care facilitators and providers.
Policy COM17: Health Facilities	There is too much trust in OUHFT which has fallen short of key services	LPR-D-140	We note the comments. The Horton Hospital is being retained and we support and recognise the range of services it provides for the local community and its wider catchment.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM18: Creating Healthy Communities	Supports the policy	LPR-D-302 (Oxfordshire County Council) LPR-D-343 (West Northamptonshire Council) LPR-D-083 (Banbury Town Council) LPR-D-218 LPR-D-282	Support is noted and welcomed.
Policy COM18: Creating Healthy Communities	The policy is too prescriptive. Considerations should be given to the requirement for a Health Impact Assessment to be submitted for all major developments	LPR-D-221	The comments are noted. We have made some proposed changes in the interests of improvement and for clarification.
Policy COM18: Creating Healthy Communities	The threshold is too small and onerous. The 10 homes threshold should be removed and Health Impact Assessments should only be provided for new strategic sites which do not benefit from full or outline permission at the time of adoption	LPR-D-225	The comments are noted. We have made some proposed changes in the interests of improvement and for clarification.
Policy COM18: Creating Healthy Communities	The policy refers to place shaping but does not mention stewardship mechanisms. Suggests amendments	LPR-D-256	The comments are noted.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM19: Hot Food Takeaways	Restriction of hot food takeaways is now more evident with NPPF including wording on this area. Proposes policy changes including exclusion zones	LPR-D-302 (Oxfordshire County Council)	The comments are noted. Changes are proposed in the interests of improvement and for clarification.
Policy COM19: Hot Food Takeaways	Supports the policy	LPR-D-083 (Banbury Town Council)	The comments are noted and welcomed.
Policy COM19: Hot Food Takeaways	Objects as the policy allows proposals within the village centre or established shopping centres within walking distance of schools and playgrounds. Suggests this should be deleted from the policy	LPR-D-093 (Kidlington Parish Council)	Disagree. It would not be reasonable to have a blanket ban on hot food takeaways in established shopping centres.
Policy COM19: Hot Food Takeaways	Suggests revision of section 3.340 in line with the residential proposals for the town centre such as Calthorpe Street. Suggests any further hot food outlet applications should be refused as a clear policy	LPR-D-180	Disagree. It would not be reasonable to have a blanket ban on hot food takeaways in established shopping centres.
Policy COM20: Providing Supporting Infrastructure and Services	Welcomes the inclusion of a dedicated policy on infrastructure. Objects as the IDP does not contain the required previous ICB submission. Notes that the council are looking to adopt CIL and proposes that the ICB should receive 20% of CIL for primary care. Requests amendments	LPR-D-272 (BOB-ICB)	The comments are noted. The ICB were consulted and engaged with on multiple occasions during the production of this Local Plan and they were given multiple opportunities to provide the details of their infrastructure requirements in relation to planned health infrastructure and required health infrastructure. The Buckinghamshire, Oxfordshire and West Berkshire Integrated Care Board did not respond to the previous Regulation 18 consultation of the Cherwell Local Plan during Autumn 2023. The BOB ICB was also given multiple opportunities between July to September 2024 to the Councils' consultants and they were provided in late October 2024 which was too late for them to be incorporated into the Regulation 19 stage of the Cherwell Local Plan. The Council has held multiple meetings with the BOB ICB between 2022 to 2024 and the Council's IDP consultants met with them in 2024. The Council does not currently operate CIL.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM20: Providing Supporting Infrastructure and Services	Supports the policy	LPR-D-218 LPR-D-262 LPR-D-263 LPR-D-321	The comments are noted and welcomed
Policy COM20: Providing Supporting Infrastructure and Services	Support the policy and suggests efforts should be made to advance the timing of infrastructure provision	LPR-D-083 (Banbury Town Council)	The comments are noted, and the support is welcomed. The relevant Councils do seek to encourage developers to provide on-site infrastructure as and when required and where it is set out in a legal agreement this enables triggers and controls as to when infrastructure should be provided and / or when part or full payments are triggered. This is subject to the developer's cash flow and the phasing and sales of their development. The Council also enters into Planning Performance Agreements where appropriate in order to fund and speed up the delivery of specific planning applications where appropriate Some infrastructure delivery is outside of the council's control but the Council will seek to engage, meet and lobby those providers to encourage quicker delivery. Delay can often be associated with financial positions and availability vs the cost of the actual infrastructure.
Policy COM20: Providing Supporting Infrastructure and Services	Supports the policy but requests clarification on the policies implementation	LPR-D-161 (Islip Parish Council)	A developer should assess the capacity of local infrastructure and should undertake pre application engagement with the relevant infrastructure providers and facilitators including statutory consultees e.g. for example including the Oxfordshire County Council who are the local highways authority and who are the local education authority. In relation to improved transport connectivity, Oxfordshire County Council supports the provision of public transport in their Local Transport and Connectivity Plan which developers need to consider. Developers are required to consider the existing services and to undertake and submit transport assessments of their proposals as part of their planning application submissions including transport modelling and they are required to propose and provide the appropriate mitigation including provision for sustainable modes of travel. With public transport it depends on the existing routes, capacity and if potential new routes and services are financially viable and potentially what external funding is available. In terms of protection and engagement of existing community facilities, a developer is required to mitigate the impact of their development.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM20: Providing Supporting Infrastructure and Services	Supports the principle of shared contributions from development. Requests clarity regarding the content and timing of developer contributions and/or a CIL charging schedule	LPR-D-286	The comments are noted. Developer contributions are controlled via the use of legal agreements, these include Section 106 and Section 278 Agreements. In the case of residential developments, these legal agreements payments will be in stages, and they have a set of triggers based on the number of houses built which will trigger a payment which relates to the cash flow from the housing sales on the site and payment amounts are subject to indexation to allow for inflation. Section 106 contributions and Section 278 contributions are very specifically defined within a legal agreement. Developers can apply to vary a legal agreement and change a trigger. The Council does not currently have a Community Infrastructure Levy and has not yet made a decision about CIL at this current time.
Policy COM20: Providing Supporting Infrastructure and Services	The policy should make clear that infrastructure requirements should be fair, reasonable, directly related to the new development and pass the CIL test	LPR-D-221	The comments are noted. Council officers follow the required legislative tests at the planning application stage. We have proposed some changes in the interests of improvement in terms of referencing the 3 legislative tests for planning obligations.
Policy COM20: Providing Supporting Infrastructure and Services	Questions the practicalities of the policy and seeks clarity about how it would operate. New development needs to be justified regarding cumulative transport impacts and relevance in relation to any future CDC CIL charging schedule.	LPR-D-222	The comments are noted, and we note that the rep welcomes the concept of developers working together. The practicalities in relation to that will be the developers to communicate with each other at the design and costing stages and to engage at the early pre application stages with the relevant infrastructure providers and facilitators in relation to what is required and when it needs to be delivered by. Developers will also need to cross refer to the Council's Infrastructure Delivery Plan and the Infrastructure Schedule. The Council currently do not have a CIL and they have not yet made a decision about CIL at this current time. In terms of transport the proposed allocations have been modelled by the Oxfordshire County Council and at pre application stage developers will need to engage with the local highways authority to obtain a license to use their transport model in order to model their proposals which includes the cumulative impact of other committed proposals at that point in time.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM20: Providing Supporting Infrastructure and Services	Questions if the policy provides certainty for what infrastructure is provided alongside development proposals. Requests clarity regarding how off-site infrastructure requirements will come forward alongside developments	LPR-D-225	The comments are noted. The Council has produced an Infrastructure Delivery Plan and an Infrastructure Schedule which formed part of the Regulation 19 Local Plan consultation, and the documents were available on the Council's website under the evidence-based section. Developers will need to undertake pre application discussions in relation to their proposals with the relevant infrastructure facilitators and providers and at that point in time they will be provided with details of the required on and off site mitigation that is required, further details on this will be provided during the planning application stage when the infrastructure facilities and providers provide their responses as to what is specifically required on and off site.
Policy COM20: Providing Supporting Infrastructure and Services	It will not be appropriate for all development proposals to demonstrate that full regard has been paid to the IDP and all other relevant policies	LPR-D-258 LPR-D-300 LPR-D-320	The comments are noted. Developers will need to have regard to the Council's Infrastructure Delivery Plan and Infrastructure Schedule at the pre application stage when designing and costing their proposals. The onus is on developers to undertake the required assessments of their proposals and to undertake proactive early pre application engagement with the relevant Councils and infrastructure providers and facilitators in order to obtain details as to what will be required on and off site to serve and mitigate their development proposals. Then further formal consultation is undertaken at the planning application stage which developers are required to address if they have not already done at the pre application stage.
Policy COM20: Providing Supporting Infrastructure and Services	Suggests all allocated sites are viability tested, and promoters are given a clear indication of the S106 costs	LPR-D-282	The comments are noted. The Plan is supported by a robust viability assessment. The Council's Infrastructure Delivery Plan and Infrastructure Schedule set out the main infrastructure requirements.
Policy COM20: Providing Supporting Infrastructure and Services	Questions why the infrastructure schedule does not suggest that KID H1 will be expected to contribute towards the A44 Mobility Hub	LPR-D-346	The comments are noted. Policy KID 3 references the transport hub and makes it clear that all development within Kidlington is required to contribute to schemes in the policy. These requirements are not duplicated in the site-specific policy.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM20: Providing Supporting Infrastructure and Services	A specific amount needs to be stated in the LPVA for healthcare mitigation	LPR-D-218	The comments are noted. The Plan's viability work has been undertaken using recognised assumptions and methodology.
Policy COM20: Providing Supporting Infrastructure and Services	Requests increased infrastructure provision to meet the needs stemming from allocated housing	LPR-D-150	Noted. The Infrastructure Delivery Plan provides detailed information on the infrastructure requirements from allocations.
Policy COM20: Providing Supporting Infrastructure and Services	Requests a clear commitment in the plan to involve parish councils as those closest to local communities in the negotiation of S106 agreements as a consequence of new development	LPR-D-201 (Middleton Stoney Parish Council)	Disagree. This is a Development Management matter.
Policy COM20: Providing Supporting Infrastructure and Services	Considers it is unclear how the realignment of Howes Land solves the issue of mitigating the traffic impact for the 3,200 homes built in that part of Bicester. The statement that a maximum 50% of all journeys from these homes will be made by the car is not justified by current evidence. Questions why travel plans and mode assessments count electric vehicles in the same category as petrol/diesel cars	LPR-D-339	The realignment of Howes Lane has been shown by relevant transport modelling to be necessary for the development of NW Bicester. Transport modelling and assumptions follow industry standards.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM20: Providing Supporting Infrastructure and Services	There is no evidence of any action being taken for Cherwell to secure investment in new energy and water connections at the county level	LPR-D-341	Disagree. The Council is working closely with infrastructure providers. Details are provided in the IDP.
Policy COM21: Meeting Education Needs	Supports the policy and anticipates that education needs can be accommodated without additional school sites. Additional special education capacity is required	LPR-D-302 (Oxfordshire County Council)	The comments are noted and welcomed, and we have noted Oxfordshire County Council's 'Guide to developer contributions' on their website which includes a specific section on Education. The Education Authority has been consulted on the proposed site allocation, and they have fed into the production of the Infrastructure Delivery Plan and Infrastructure Schedule.
Policy COM21: Meeting Education Needs	Supports the policy but suggests a site should be identified for an additional secondary school in Banbury which should be protected against alternative development	LPR-D-083 (Banbury Town Council)	The comments are noted. The Local Education Authority has been consulted on the Council's draft Regulation 18 and Regulation 19 Cherwell Local Plan, the proposed site allocations and including the Council's Infrastructure Delivery Plan and Infrastructure Schedule which contains the County's Education requirements for the proposed site allocations.
Policy COM21: Meeting Education Needs	The policy should state that developments would not be expected to meet any additional or alternate expectations at the time a reserved matters application is subsequently made for school development. Suggests additional wording	LPR-D-225	The comments are noted. Disagree with the comments. It depends how long ago the outline planning application received consent and if the housing mix has and if existing pupil capacity has changed between the outline and reserved matters application as this may result in changes to the required educational provision e.g. number of pupil places, amount of contributions, size of extension or school required.
Policy COM22: Public Services and Utilities	Some services and utilities work requires archaeological monitoring	LPR-D-302 (Oxfordshire County Council)	The comments are noted.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM22: Public Services and Utilities	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy COM23: Local Services and Community Facilities	Requests clarification and for commitment to further separate guidance on relation if they need to be relocated to a different location or in the event they are no longer needed for the original purpose and/or loss of facilities.	LPR-D-302 (Oxfordshire County Council)	The comments are noted.
Policy COM23: Local Services and Community Facilities	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-240 (Fritwell Parish Council)	Support noted and welcomed.
Policy COM23: Local Services and Community Facilities	Paragraph 3.366 should include strengthened protection against loss of amenities. Supports seeking to protect against change of use for pubs without a 'robust marketing exercise' and suggests text additions. Detrimental alterations made to premises should not be used in determination of viability	LPR-D-162	The comments are noted.
Policy COM23: Local Services and Community Facilities	The second part of the policy that sets out the criteria for assessing the loss of facilities should be amended to have 'or' in-between the criteria as it would be almost impossible to meet both criteria	LPR-D-234	The comments are noted. Disagree. The existing policy is appropriately worded.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM23: Local Services and Community Facilities	The focus of the policy is on loss rather than need, design, operation and funding of facilities. Facilities when provided should be supported by a substantial stewardship mechanism that caters for the management and maintenance of facilities	LPR-D-256	The comments are noted.
Policy COM24: Open Space, Sport and Recreation	Welcomes reference to growing spaces and their impact on health and wellbeing	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed.
Policy COM24: Open Space, Sport and Recreation	Supports the policy	LPR-D-244 LPR-D-262 LPR-D-263	Support noted and welcomed.
Policy COM24: Open Space, Sport and Recreation	Supports the policy but clarification is needed on the option to enhance existing provision and if this is secured via S106. Where new facilities are required these should be set out in site allocation policies	LPR-D-165	The comments are noted.
Policy COM24: Open Space, Sport and Recreation	Welcomes the intention to consult Town and Parish councils to ensure proposals meet local needs	LPR-D-083 (Banbury Town Council)	Noted and welcomed.
Policy COM24: Open Space, Sport and Recreation	Object to retained operation land at Bretch Hill Reservoir as existing green space. It should be removed from this designation	LPR-D-079	The comments are noted and we disagree with the comments.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM24: Open Space, Sport and Recreation	Concern over loss of green space for recreation in Kidlington. There should be a greater mention of recreational opportunities and greater protection for existing facilities	LPR-D-002	The comments are noted. The Plan is supported by a green and blue infrastructure strategy. The levels of protection are consistent with the NPPF.
Policy COM24: Open Space, Sport and Recreation	Evidence related to the policy is flawed, and requests the policy is reconsidered in response to the needs of Kidlington Cricket Club and Stratfield Brake	LPR-D-282	Disagree. The Plan is supported by an up to date Playing Pitch Strategy.
Policy COM24: Open Space, Sport and Recreation	LAP provision and green**space** requirements can be met, but notes there is no requirement for new formal sports provision or allotments, in contra**r**y with RUR H1- requests clarification	LPR-D-213	The comments are noted.
Policy COM24: Open Space, Sport and Recreation	It should be stated that developments would not be expected to meet any additional or alternate expectations as set out within COM24 at the time a reserved matters application is subsequently made. Suggests additional wording is included	LPR-D-225	The comments are noted. We disagree the proposals could change at the reserved matters stage. which may also result in amendments to the Section 106 Agreement.
Policy COM24: Open Space, Sport and Recreation	The focus of the policy is on loss rather than need, design, operation and funding of facilities. Facilities when provided should be supported by a substantial stewardship mechanism that caters for the management and maintenance of facilities	LPR-D-256	The comments are noted. When new facilities and / or open space are provided the details of their management and maintenance and the mechanisms and future roles in relation to those are detailed in a Section 106 legal agreement and controlled via the Section 106 Agreement and via the use of planning conditions.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM24: Open Space, Sport and Recreation	Requirements for open space exceed the Fields in Trust standards. The requirements for an on-site NEAP for developments of 50 dwellings or more also exceeds the Fields in Trust benchmark which could impact viability	LPR-D-050	Disagree. The open space requirements have been considered in viability testing. The Council has a very good track record of delivering to its standards.
Policy COM25: Local Green Space	Supports the inclusion of natural surveillance in policy wording. Objects designation of Hudson Street site as it is not in accordance with NPPF 106/107 and would prevent Oxfordshire County Council from redeveloping its land to address statutory needs. Hudson Street designation should be deleted from the proposed list of Local Green Spaces and the Policies Map	LPR-D-302 (Oxfordshire County Council)	Oxfordshire County Council as landowner and Local Education Authority has provided comments on the designation of Local Green Spaces on land in their ownership. They object to the allocation of land at Hudson Street, Bicester and provide evidence to support the position: The site previously formed part of the adjacent Bicester School and was retained for education use in the event of needing to expand Bicester School, Brookside Primary School or any of the other local schools within Bicester. The proposed Local Green Space designation would infringe upon OCC's ability to redevelop its land and property assets to address statutory needs. The IDP supporting the CLPR identifies the need for special needs education in Cherwell. Officers consider that the designation of Hudson Street as a Local Green Space fails to meet the PPG requirement as it would prevent the Local Education Authority from providing identified educational needs. 'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.' Therefore, we agree with the proposed change that Hudson Street, Bicester is not designated as a Local Green Space, and this is included in the list of proposed changes.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM25: Local Green Space	Does not object to the council identifying local nature reserves within the Local Plan however there is an issue with the proposed designation of land south and west of Stratfield Brake Sports Ground. There is no mention of the intention of Oxford United FC to move their stadium to land at The Triangle and identifying the area adjacent as a nature reserve is likely to prejudice the opportunity to resolve this issue. Stratfield Brake is also expected to be the location of a new artificial pitch, and the presence of a nature reserve could mean lighting is not permitted. Requests a buffer is placed between the Nature Reserve and Stratfield Brake and that the location of an artificial pitch with sports lighting should be identified. If an accessible nature reserve is proposed, a large area of parking should be proposed alongside it. The plan should identify where the new Oxford United stadium will be located.	LPR-D-191	The proposed LGS at Stratfield Brake meets the NPPF requirements for designation. The desire for an artificial pitch for Oxford Utd is not within the Council's Playing Pitch Strategy and no detailed proposals have been received. The proposed stadium is the subject of a planning application which has yet to be determined. It is not a facility to meet Cherwell's needs. It is not necessary to include within the local plan.
Policy COM25: Local Green Space	Supports the policy	LPR-D-161 (Islip Parish Council)	Support noted and welcomed.
Policy COM25: Local Green Space	Support the policy as The Moors is not being proposed as a Local Green Space	LPR-D-282	Support noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM25: Local Green Space	Supports the policy but noted concern that only three proposed by CPRE has been approved. Questions why only three allotments have been included. Support and endorses designation of Banbury Lane, Nethercote as a Local Green Space	LPR-D-257	Noted. All proposed LGS have been assessed. Only those that meet the necessary criteria have been included within the Plan.
Policy COM25: Local Green Space	Welcomes the designation of Gavray Drive Meadows but suggests rewording of the policy and the land management objectives. Queries the land use frameworks	LPR-D-146	Noted. No change is proposed to the policy.
Policy COM25: Local Green Space	Promotes Land Behind the Moors, Kidlington for designation as a Local Green Space	LPR-D-038 LPR-D-115 LPR-D-116 LPR-D-117 LPR-D-120 LPR-D-122 LPR-D-127 LPR-D-158 LPR-D-197 LPR-D-277 LPR-D-348	Noted. All proposed LGS have been assessed. Only those that meet the necessary criteria have been included within the Plan.
Policy COM25: Local Green Space	Objects to the rejection of Bury Moor Fields, Land West of the footpath from mill-end to St Mary's Church and Stratfield Brake Playing Fields as Local Green Spaces. These should be designated. Notes that the 'green ring' proposal is not included and should also be designated as a Local Green Space	LPR-D-093 (Kidlington Parish Council) LPR-D-338	Noted. All proposed LGS have been assessed. Only those that meet the necessary criteria have been included within the Plan.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM25: Local Green Space	Objects to the rejection of Banbury Lane, Nethercote as a Local Green Space	LPR-D-100	Noted. All proposed LGS have been assessed. Only those that meet the necessary criteria have been included within the Plan.
Policy COM25: Local Green Space	Designation of Stratfield Brake Nature Reserve is a small, limited area and the designation should be extended in the Kidlington Area	LPR-D-002	Noted. All proposed LGS have been assessed. Only those that meet the necessary criteria have been included within the Plan.
Policy COM25: Local Green Space	Requests discussion over council owned sites for designation	LPR-D-083 (Banbury Town Council)	The views of the Town Council are noted. There has been ample opportunity over multiple stages of the plan making process for the TC to propose potential local green space.
Policy COM25: Local Green Space	Supports no further building on the Green Belt	LPR-D-277	Support noted and welcomed.
Policy COM26: Historic Environment	The policy should be amended to reflect significance rather than character. Reference should be made to non-designated rather than undesignated. Suggests wording amendments	LPR-D-274 (Historic England)	Agree to amend policy in line with NPPF.
Policy COM26: Historic Environment	Supports the policy and suggests improvements. The last paragraph could read as contradictory and suggests improvements	LPR-D-302 (Oxfordshire County Council)	Welcome support. Disagree that last paragraph is contradictory.
Policy COM26: Historic Environment	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy COM26: Historic Environment	Supports the policy. Suggests amendments and requests a new site-specific policy on Broughton Castle	LPR-D-299	Welcome support. Consider the policies in the Plan can be used to consider Broughton Castle. No new specific policy is required.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM26: Historic Environment	Objects to the wording- 'clear public benefit to outweigh' in the policy. Supports requirement for heritage statements and suggests the Local Plan could mandate Parishes to maintain a Heritage Asset Register	LPR-D-020	Comments noted, no change. The NPPF refers to a clear and convincing justification with reference to any harm to, or loss of, the significance of a designated heritage asset. It goes on to reference 'substantial public benefits' at paragraph 207. Note suggestion regarding the Local Plan to mandate Parishes to maintain a Heritage Asset Register though consider this is more appropriately undertaken at a District level or through the Historic Environment Record.
Policy COM26: Historic Environment	The need for separate policies for each type of heritage asset is questioned. If there are going to be separate policies, they should be set out in the order of the statutory hierarchy	LPR-D-262 LPR-D-263	Recognise that there are a number of policies, but the length of criterion/matters to be addressed are better separated into separate policies.
Policy COM26: Historic Environment	The policy objectives are supported but considers it is excessively detailed. Policies COM 26, 27, 38 and 29 should be deleted and replaced with a single policy	LPR-D-210	Welcome support. Recognise that there are a number of policies, but the length of criterion/matters to be addressed are better separated into separate policies to ensure clarity. The separate policies provide greater clarity and enable detailed policy requirements to be set out.
Policy COM26: Historic Environment	Two different landscape studies are referred to. Each policy should either refer to the same study or both	LPR-D-257	Different landscape studies form part of the evidence base and had different briefs. Both or one will apply depending on the circumstances of the application rather than the policy itself.
Policy COM26: Historic Environment	The policy largely replicates national policy and adds little more. Therefore, it could be removed from the plan. The council could provide a single register identifying non-designated heritage assets	LPR-D-234	Consider the policy is helpful to guide development in Cherwell and provide certainty to developers.
Policy COM26: Historic Environment	The final paragraph introduces a new test which is confusing and contradictory. Reference to 'substantive tangible public benefits' and the requirement for those to 'clearly and convincingly outweigh harm are inappropriate. Recommends amendments to the text	LPR-D-229	Disagree that last paragraph is contradictory.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM26: Historic Environment	It would be helpful if the policy or supporting text explained that proposals that do not deliver a building's optimum viable use will not normally be allowed. Suggests changes to wording and requests the inclusion of non-designated assets	LPR-D-172	Comments noted. This is set out at paragraph 208 of the NPPF, though it is recognised that 'where appropriate' has been added as part of a balancing exercise in less than substantial harm.
Policy COM27: Conservation Areas	Support the policy	LPR-D-274 (Historic England) LPR-D-020 LPR-D-083 (Banbury Town Council) LPR-D-095 (Drayton Parish Council) LPR-D-160 LPR-D-161 (Islip Parish Council) LPR-D-240 (Fritwell Parish Council) LPR-D-344 (Hanwell Parish Council)	Support noted and welcomed.
Policy COM27: Conservation Areas	Makes suggestions to the wording in reflection of their Regulation 18 representation	LPR-D-172	Disagree, the point is that where a building is capable of repair or is capable of beneficial use then this should be explored prior to demolition.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM27: Conservation Areas	The policy is expressed in absolute terms with its requirement that proposals must conserve or enhance the relevant conservation areas. This does not allow for the balancing principles to be used. Requests amendments to the text	LPR-D-229	The policy does not preclude a balanced judgement being made.
Policy COM27: Conservation Areas	Largely replicates national policy and adds little more, so recommends its removal. The council could provide a single register where non-designated heritage assets are identified	LPR-D-234	Consider the policy is helpful to guide development in Cherwell and provide certainty to developers.
Policy COM27: Conservation Areas	The policy objectives are broadly supported but feels is excessively detailed. Policies COM 26, 27, 38 and 29 should be deleted and replaced with a single policy	LPR-D-210	Welcome support. Recognise that there are a number of policies, but the length of criterion/matters to be addressed are better separated into separate policies to ensure clarity. The separate policies provide greater clarity and enable detailed policy requirements to be set out. Consider the policy is helpful to guide development in Cherwell and provide certainty to developers.
Policy COM27: Conservation Areas	Requests the boundaries of designated conservation areas are reviewed and, in some places, extended	LPR-D-149	There is a programme of Conservation Area Character Appraisals which are being undertaken by the Council.
Policy COM27: Conservation Areas	Paragraphs 3.285 and 3.390 refer to different evidence studies	LPR-D-257	Noted. A change to the text to correct this is proposed.
Policy COM28: Listed Buildings	Supports the policy	LPR-D-274 (Historic England) LPR-D-083 (Banbury Town Council)	Support noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM28: Listed Buildings	The policy is supported, suggests amendments to the text and inclusion of a new site-specific policy on Broughton Castle	LPR-D-299	Welcome support. Consider the policies in the Plan can be used to consider Broughton Castle. No new specific policy is required.
Policy COM28: Listed Buildings	The policy is too weak, and suggests amendments to the wording	LPR-D-172	Disagree, consider the policy is clear whilst providing flexibility.
Policy COM28: Listed Buildings	The policy objectives are broadly supported but feels it is excessively detailed. Policies COM 26, 27, 38 and 29 should be deleted and replaced with a single policy	LPR-D-210	Recognise that there are a number of policies, but the length of criterion/matters to be addressed are better separated into separate policies. Consider the policy is helpful to guide development in Cherwell and provide certainty to developers.
Policy COM28: Listed Buildings	Largely replicates national policy and adds little more, so recommends its removal. The council could provide a single register where non-designated heritage assets are identified	LPR-D-234	Consider the policy is helpful to guide development in Cherwell and provide certainty to developers.
Policy COM29: Registered Parks and Gardens and Historic Battlefields	There is a single register of Historic Battlefields. Suggests amendments to the wording	LPR-D-274 (Historic England)	Agree.
Policy COM29: Registered Parks and Gardens and Historic Battlefields	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM29: Registered Parks and Gardens and Historic Battlefields	Generally supports the policy but notes the policy should also promote the historic interest, character or setting of those assets recognised to be of significance by the LPA. Suggests wording amendments	LPR-D-160	Amended wording is proposed to align with Historic England suggestions.
Policy COM29: Registered Parks and Gardens and Historic Battlefields	Supports the policy, suggests amendments. Requests addition of a new site-specific policy on Broughton Castle	LPR-D-299	Welcome support. Consider the policies in the Plan can be used to consider Broughton Castle. No new specific policy is required.
Policy COM29: Registered Parks and Gardens and Historic Battlefields	The policy does not add anything beyond COM 26 and should be deleted. The policy does not mention provision of NPPF paragraph 215 for decision makers to weigh harm against public benefits	LPR-D-064	Consider the policy is helpful to guide development in Cherwell and provide certainty to developers.
Policy COM29: Registered Parks and Gardens and Historic Battlefields	The policy objectives are broadly supported but feels it is excessively detailed. Policies COM 26, 27, 38 and 29 should be deleted and replaced with a single policy	LPR-D-210	Recognise that there are a number of policies, but the length of criterion/matters to be addressed are better separated into separate policies. Consider the policy is helpful to guide development in Cherwell and provide certainty to developers.

LOCAL PLAN PROPOSED SUBMISSION: Building Healthy and Sustainable Communities (CHAPTER 3: Theme 3)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer response**
Policy COM29: Registered Parks and Gardens and Historic Battlefields	Largely replicates national policy and adds little more, so recommends its removal. The council could provide a single register where non-designated heritage assets are identified	LPR-D-234	Consider the policy is helpful to guide development in Cherwell and provide certainty to developers.
Policy COM30: The Oxford Canal	Supports the policy	LPR-D-274 (Historic England) LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy COM30: The Oxford Canal	The heritage of the Oxford Canal should be enhanced in any development proposal	LPR-D-302 (Oxfordshire County Council)	Noted.
Policy COM31: Residential Canal Moorings	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN1: Banbury Area Strategy	Considers the Level 1&2 SFRAs and the sequential and exception test does not justify the proposed housing and employment site growth. Notes a new national model is to be published in Spring 2025 which may impact some of the sites	LPR-D-312 (Environment Agency)	Disagree. The Plan is supported by extensive flood risk evidence, including updates to reflect the new national model.
Policy BAN1: Banbury Area Strategy	Supports the policy	LPR-D-274 (Historic England) LPR-D-301	Support noted and welcomed.
Policy BAN1: Banbury Area Strategy	In support of the strategy but requests that specific sites are identified for BUFC safeguarding and an additional secondary school	LPR-D-083 (Banbury Town Council)	Noted. A site for the relocation of BUFC and an additional secondary school is addressed by saved policies BANBURY 12 and BANBURY 4.
Policy BAN1: Banbury Area Strategy	Supportive of the vision to create new attractive public space for the town and canalside	LPR-D-052	Support noted and welcomed.
Policy BAN1: Banbury Area Strategy	Supportive of the vision and strategy but suggests the reduction of bus fares	LPR-D-073	Noted. Bus fares are beyond the scope of the local plan.
Policy BAN1: Banbury Area Strategy	Support significant growth in Banbury but considers the strategy to be high risk given that all housing growth in Banbury is in the form of larger scale SUE sites or regeneration areas. There is a heavy reliance on these for delivery	LP-D-091	Noted. The Plan policies allow for windfall sites to come forward in the town. Opportunity areas for development are also identified.
Policy BAN1: Banbury Area Strategy	Objects to the planned housing for Banbury	LPR-D-299	Noted.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN1: Banbury Area Strategy	Considers there is potential to have a new healthcare facility in Banbury however any new provision must be financially and operationally viable to the ICB. The ICB would raise objection if any proposed provisions are not financially and operationally viable. Naming of the ICB in paragraph 4.34 is incorrect and should be corrected	LPR-D-272 (BOB-ICB)	Noted. All developer contributions sought by the Council will need to be compliant with the CIL regulations. Paragraph 4.34 has been corrected.
Policy BAN1: Banbury Area Strategy	Banbury has a rich history. Town centre redevelopment has the potential to reveal medieval remains and its role in the English Civil War	LPR-D-302 (Oxfordshire County Council)	Noted. Bus fares are beyond the scope of the local plan.
Policy BAN1: Banbury Area Strategy	The strategy lacks ambition and will restrict growth. It incorrectly draws on the landscape character as a development constraint	LPR-D-248	Disagree. The Plan expects 6,477 new homes to be delivered at Banbury during the Plan period.
Policy BAN1: Banbury Area Strategy	Different road infrastructure proposals planned over the years have not been implemented resulting in congestion in and around the town. Roof top solar panels should be encouraged particularly on industrial buildings. Support for improving the hospital. Considers relocating the bus station is not practical unless units on the Tramway are demolished. Housing close to the town centre is supported but parking is essential unless bus services are sufficient	LPR-D-031	Noted.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN1: Banbury Area Strategy	Supports the vision to create new attractive public space for the town and linear park along the Canalside. Notes additional housing will increase demand on transport, education and health services thus requiring investment. There is currently insufficient provision of outdoor sports facilities for young people	LPR-D-052	Noted.
Policy BAN1: Banbury Area Strategy	There are just two housing sites allocated at Banbury, notes the allocation of Canalside but that this is subject to numerous freehold interests and tenancy leases meaning delivery in Banbury would be slow, and lack variety and flexibility. States a range and mix of housing sites at different sizes in/around Banbury would be supported	LPR-D-054	The Plan proposes a mix of sites in Banbury. A number of sites are also saved from the adopted Local Plan.
Policy BAN1: Banbury Area Strategy	Sufficient employment is needed to support the allocated housing development	LPR-D-150	It is considered that the Plan balances the provision of housing with employment across the district.
Policy BAN1: Banbury Area Strategy	The policy should identify and recognise the importance and social/economic benefits of delivering the proposed allocations in the short-medium term	LPR-D-134	Noted. It is not considered necessary to include this wording within the Policy.
Policy BAN1: Banbury Area Strategy	Additional land is required for a balanced supply, at present it does not align with the NPPF or meet Cherwell's housing needs	LPR-D-215	Disagree.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN1: Banbury Area Strategy	Regarding the relocation of Banbury football club, if amends are proposed to the existing site allocation, they should be shared with Sport England	LPR-D-191	Noted. No changes are proposed to the existing allocation.
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	Strongly objects to the omission of a junction on the M40 north of Banbury as this is necessary to reduce traffic congestion and reduce air pollution A South-East link road needs to be developed, and the plan is inadequate without the inclusion of an additional road connecting the M40 at J11	LPR-D-083 (Banbury Town Council) LPR-D-186	Noted. The Policy is informed by transport modelling undertaken in collaboration with OCC and consultation with National Highways. Transport evidence supporting the CLPR include the Transport modelling and Banbury Transport Topic Papers. A number of measures have already been delivered including the signalisation of M40 J11 and OCC are progressing a Movement and Place Strategy (MAPS) for Banbury which will include the review of how traffic along Hennef Way could be reduced and redistributed. National Highways are responsible for the strategic road network including the M40. We will continue to work with OCC and National Highways as the CLPR progresses to adoption and during the preparation of OCC's emerging Banbury MAPS.
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	Questions the spine road between A361 and A4620	LPR-D-060	This is an approved scheme. Delivery has commenced.
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	This should be rewritten and properly detailed to permit realistic comment by consultees	LPR-D-239	Noted. The CLPR is supported by place-based transport topic papers with the wider reasoning supporting CLPR policies published for consultation in December 2024.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	Providing further housing to the north of the town will reduce the pressure to create direct transport links and promote sustainable development	LPR-D-221	Noted. No development is proposed for allocation north of the town.
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	There is no specific mention of areas being improved for the development north of Southam Road. Improved and safe walking, wheeling and cycling routes are required	LPR-D-168	Noted. Policy BAN 2 supports the delivery of the Banbury Local Cycling and Walking Infrastructure Plan (LCWIP), this includes improved active travel connections in the Hanwell Fields and Southam Road area (Route 5 A361/A423 Southam Road, Route 8 Meadow Drive and Route 18 Canal Towpath).
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	The requirement for transport infrastructure at Banbury must be developed and coordinated through early engagement with Catesby Estates and Oxfordshire County Council	LPR-D-134	Disagree. The integration of land use and transport plans is necessary to promote sustainable development. Liaison between development promoters and OCC does not replace the requirements to demonstrate integration placed on district and county councils by the NPPF.
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	Notes support for implementing a footpath linking the railway and bus stations	LPR-D-031	Noted

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	Supports paragraph 4.15 on improving connectivity and delivering infrastructure improvements. Proposes CDC campaign for reduction of bus fares and investigates 'on demand' bus provision	LPR-D-073	Noted
Policy BAN2: Delivery of Strategic Transport Schemes within the Banbury Area	Considers work is needed on Queensway to mitigate traffic	LPR-D-171	Noted.
Policy BAN3: Development in the Vicinity of Banbury Railway Station	Relocating the bus station is not practical unless units on the Tramway are demolished	LPR-D-031	Noted.
Policy BAN4: Green and Blue Infrastructure in the Banbury Area	Supports the policy	LPR-D-302 (Oxfordshire County Council) LPR-D-083 (Banbury Town Council)	Support noted and welcomed.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN4: Green and Blue Infrastructure in the Banbury Area	Welcomes the development of the country park to the north of the town and the recognition of Dame Sylvia Crowe. Notes concern on the issues of land ownership, access, funding, and management. Suggests naming the country park	LPR-D-186	Noted. Issues raised are beyond the remit of the Plan.
Policy BAN4: Green and Blue Infrastructure in the Banbury Area	There is an opportunity to focus on the importance of more peripheral blue and green areas. Suggests delivery to the north of the town connecting the area around Hanwell Brook with the playing fields adjacent on Dukes Meadow Drive	LPR-D-221	Noted. Cherwell's Green and Blue Infrastructure Strategy provides further and more detailed information supporting Policy BAN4 including improved green and blue corridor connections and ecological connectivity to Hanwell Book Wetland and improved footpaths and cycle routes to Hanwell.
Policy BAN5: Horton Hospital Site	Notes the policy and support for primary care facilities in Banbury and at the Horton Hospital. The ICB has no plans for any onsite primary care provisions at the Horton Hospital. And will continue to work with their NHS Partner (OUHT) to see if there is any potential to have onsite primary care provision at the improved Horton Hospital	LPR-D-272 (BOB-ICB)	Noted.
Policy BAN5: Horton Hospital Site	Supports the policy but recommends the inclusion of a further statement within the policy stating that no part of the site will be disposed of to fund/facilitate medical development and that the site should be retained for future hospital needs	LPR-D-083 (Banbury Town Council)	The proposed amendments are not supported as considered unnecessary.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN5: Horton Hospital Site	Supports expanding the hospital, particularly reinstating the maternity ward	LPR-D-031	Noted and welcomed
Policy BAN5: Horton Hospital Site	There appears to be no protection from speculative housing development plans which could encourage OUHFT to dispose of parts of the Horton Hospital	LPR-D-140	Disagree. Any proposals would need to relate to the hospital, but could potentially include housing for NHS staff.
Policy BAN6: Banbury Opportunity Areas	Supports the policy	LPR-D-274 (Historic England)	Support noted and welcomed.
Policy BAN6: Banbury Opportunity Areas	Supports the policy but believes the identification of an acceptable alternative site for the bus station should be a prerequisite for development being approved	LPR-D-083 (Banbury Town Council)	Noted.
Policy BAN6: Banbury Opportunity Areas	Policy support should be added for car free development at town centre sites	LPR-D-302 (Oxfordshire County Council)	Any town centre developments will provide car parking in accordance with the County Council's car parking policy.
Policy BAN6: Banbury Opportunity Areas	Notes contradiction with BAN 2 which suggests the current conditions are substandard whereas BAN 6 would imply the closure of the bus station with no replacement suggested	LPR-D-186	Any relocation would be subject to feasibility work.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN M/U1: Banbury Canalside	Consider the Level 1&2 SFRAs and the sequential and exception test does not justify the proposed housing and employment site growth in the policy. A new national model is to be published in Spring 2025 which may further impact some of the sites. The Banbury Flood Alleviation Scheme was completed in 2012 with a design life of 100 years, so considering that the lifespan of residential dwellings are 100 years, they will outlive the scheme. It cannot be guaranteed that the Environment Agency will be able to continue to maintain flood defences in Banbury. Finished floor levels should be set at the design flood level in the undefended scenario, and breaching of defences should be considered before the site is allocated	LPR-D-312 (Environment Agency)	Noted. Additional flood risk assessments have been undertaken which take account of the new national model.
Policy BAN M/U1: Banbury Canalside	Does not object to the allocation but notes concern about wording which loses the opportunity to benefit from the Council's HIA. Recommends amendments to the wording	LPR-D-274 (Historic England)	Noted. Amendments proposed.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN M/U1: Banbury Canalside	Objects to the policy and requests amendments so as to withdraw the objection. The ICB would not agree to any proposed onsite healthcare provision if it is not financially and operationally viable. The ICB does not consider that 700 dwellings could support a new standalone healthcare facility unless it is the relocation of an existing GP practise or co-location of GP practices. The ICB expects a 'turnkey' healthcare facility	LPR-D-272 (BOB-ICB)	Noted. Discussions are ongoing with the ICB to provide additional primary care capacity within the town.
Policy BAN M/U1: Banbury Canalside	The requirement for car-free development is supported. As it is located in the historic Canal Wharfs of Banbury there is high potential for remains related to post industrial development and possible earlier remains. Notes waste management facilities can co-exist with other employment uses. An archaeological desk-based assessment must be prepared. Use classes listed should be amended to include Sui Generis	LPR-D-302 (Oxfordshire County Council)	Noted.
Policy BAN M/U1: Banbury Canalside	Support the policy	LPR-D-218 LPR-D-052	Support noted and welcomed.
Policy BAN M/U1: Banbury Canalside	Welcomes the policy especially regarding the retention of large mixed use businesses and the green walkway along the banks of the river. Notes the green	LPR-D-019	Noted and welcomed.

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	walkway could be achieved without taking land from light industrial businesses		
Policy BAN M/U1: Banbury Canalside	Supports the policy and considers Cherwell District Council should take the lead in the redevelopment of the site by providing a masterplan	LPR-D-083 (Banbury Town Council)	Noted.
Policy BAN M/U1: Banbury Canalside	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on and off site, clarity on what loading/flow from the development is anticipated, water supply requirements on and off site. Developers should work alongside Thames Water and recommend developer attach information Thames Water provide on their planned applications.	LPR-D-079	Noted.
Policy BAN M/U1: Banbury Canalside	Questions if the site is deliverable, having been included in the 2031 plan but not yet delivered	LPR-D-091	This is an important brownfield site immediately adjacent to the town centre. It is acknowledged that there are some issues around delivery. However, the Council is a significant landowner and is facilitating delivery through various mechanisms and with the support of Homes England.
Policy BAN M/U1: Banbury Canalside	There is no reference to the overlap of land allocations or how conflict should be resolved. There should be a further requirement to protect the Local Green Space	LPR-D-100 LPR-D-257	The policy is clear that the site is suitable for mixed use development. There are other policies in the plan
Policy BAN M/U1: Banbury Canalside	The proposal fails to address flood problems	LPR-D-186	Disagree. The site is supported by a Level 2 SFRA.

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Policy BAN M/U1: Banbury Canalside	Canalside development should account for health and safety issues	LPR-D-031	Pollution and contamination is recognised in the policy requirements.
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Supports the design requirement but recommends liaison with the council's archaeological adviser on the approach to remains. Recommends the inclusion of a landscape buffer to protect the setting of the Grade II listed Wykham Farmhouse and that the developable area is pulled back from areas of archaeological interest	LPR-D-274 (Historic England)	Noted. The policy requires a landscape buffer to protect the setting of the farmhouse. The site has been subject to a heritage impact assessment.
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Objects to the policy and proposes new text. The proposed development would generate significant pressure on existing local GP practices. Supports the point related to primary health care	LPR-D-272 (BOB-ICB)	Noted. The Council is continuing to engage with the ICB on ways to improve primary care provision in the area that is compliant with CIL regulations.

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Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Suggests amendments regarding education provision. Supports the development being pulled back from areas of archaeological interest and details the level of archaeological investigation required for the site. Supports the position on no vehicular access from Wykham Lane and the proposed buffering including that related to the listed farmhouse. Archaeological predetermination works are required starting with a geological survey. The applicant should be responsible for the implementation of an archaeological field evaluation prior to determination. It should be ensured that the proposed site and the approved development to the north complement each other regarding green infrastructure and open space provision	LPR-D-302 (Oxfordshire County Council)	Noted.
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Supports the policy	LPR-D-083 (Banbury Town Council) LPR-D-134 LPR-D-218	Support noted and welcomed.

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Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Supports the allocation, but recommends the key diagram is updated so BAN H2 does not appear to be floating	LPR-D-091	Noted
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Agrees with the allocation but as phase 1 will take years to complete, before phase 2 can commence means it is a very long term strategy and as such smaller and more immediately deliverable sites are required	LPR-D-091	The expected delivery of this site is consistent with landowner/developer advice.
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	The site is a logical and sustainable extension but queries the removal of an area of the site proposed previously as open space/green space. Requests the council notes that the site can accommodate 625 dwellings rather than 600 and that the removed land is reinstated	LPR-D-134	Noted, particularly site capacity. It is not considered appropriate to include the land in question within the site allocation. The character of the area is described in paragraph 4.52.
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Objects as the area is prone to flooding and it is a risk to have a link road/rat run traffic past homes	LPR-D-007	Disagree. The allocation has been subject to an appropriate flood risk assessment. The site will be accessed from the new development currently under construction to the north.

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Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Objects as there is not provision for sports pitches and due to the provision of the SEFC relocation	LPR-D-235	No new pitches are proposed on the site. In line with the Council's Playing Pitch Strategy financial contributions are being sought to improve other local facilities.
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Objects and considers the policy to be unsound. Alternative locations are available with significantly less impact on the natural environment. Notes concern on the proximity to the Northern Valleys Conservation Target Area, that the site would bring major urban development closer to Sor Brook and comments that the CTA and Sor Brook including habitats and species present should not be negatively impacted. The site should not be taken forward and if it is extra text should be included to address these concerns	LPR-D-238	Disagree. The site allocation is supported by the Plan's evidence base, and SA.
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	The site is not justified through the Sustainability Appraisal process. There is a lack of infrastructure and landscape buffer. The site and policy should be deleted	LPR-D-057	Disagree.

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Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	The site does not have good access to the town centre. A new bus service should be implemented	LPR-D-060	The policy requires public transport links.
Policy BAN H2: East of Bloxham Road, Banbury (South of Salt Way East- Phase 2)	Early engagement between the developers and Thames Water would be beneficial to understand the drainage requirements on and off site, clarity on what loading/flow from the development is anticipated, water supply requirements on and off site. The council and developers should work alongside Thames Water and recommends that developers attach information provided to them to their planning application.	LPR-D-079	Noted
Policy BAN H3: Calthorpe Street	Considers that the level 1&2 SFRAs and the sequential and exception tests do not justify the proposed housing and employment growth in the policy. Notes a new national model is to be published in Spring 2025 which may impact the site	LPR-D-312 (Environment Agency)	Consider the Level 1 and 2 SFRA alongside the Sequential and Exception test do justify the proposed growth set out in the Plan. Acknowledge new data is published and the Council has commissioned an update to the Levels 1 and 2 in light of this to help address the specific concerns raised by the EA in respect of flood data. The flood evidence and other documents such as the HELAA, have helped to filter the potential allocations of land for housing and employment. The flood evidence has also helped influence the policy requirements for specific sites in accordance with national policy.
Policy BAN H3: Calthorpe Street	The policy needs greater clarity on its approach to heritage assets. Suggests wording and amendments to achieve this	LPR-D-274 (Historic England)	Noted. Proposed changes suggested.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BAN H3: Calthorpe Street	Objects to the policy unless the text is amended to the text proposed by the ICB. Notes the proposed development would result in significant pressure on existing local GP practises and does not cross reference to Policy COM17 which it should.	LPR-D-272 (BOB-ICB)	Noted. The Council is continuing to engage with the ICB on ways to improve primary care provision in the town that is compliant with CIL regulations.
Policy BAN H3: Calthorpe Street	Support should be added in the policy for car free development at town centre sites. Notes the site is in an area of archaeological interest and if permission is granted, a staged program of archaeological investigation is required	LPR-D-302 (Oxfordshire County Council)	Noted. This is addressed by Policy COM 26. Parking will be provided in accordance with the County's requirements.
Policy BAN H3: Calthorpe Street	Early engagement between the developers and Thames Water would be beneficial to understand drainage requirements on and off site, clarity on the anticipated loading/flow from the development and water requirements on and off site. The council and developers should work alongside Thames Water and recommends that developers attach information provided from Thames Water to their planning applications	LPR-D-079	Noted.
Policy BAN H3: Calthorpe Street	Supports the policy	LPR-D-301	Support noted and welcomed.
Policy BAN H3: Calthorpe Street	Considers that the site is suitable but not for 170 dwellings due to the constraints on the site	LPR-D-083 (Banbury Town Council)	Noted.

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Policy BAN H3: Calthorpe Street	Questions if the site will come forward in line with the councils trajectory	LPR-D-091	The trajectory for this site is informed by information provided by landowners/developers and recent planning history, amongst other evidence.
Policy BAN H3: Calthorpe Street	Comments concern due to the loss of public car parking. Notes the text requires amendments to reflect a more appropriate balance between the Local Planning Authority and communities' aspirations	LPR-D-186	The Council will ensure that there is adequate public car parking in the town.
Policy BAN M/U2: Bolton Road	Requests the policy is edited to consider the impact of the development on the setting of adjacent heritage assets. Notes and archaeological desk based assessment will be required and potentially a field evaluation to avoid and minimise harm to archaeological remains	LPR-D-274 (Historic England)	Noted. This is addressed by Policy COM 26.
Policy BAN M/U2: Bolton Road	Objects unless the policy text is amended to that proposed by the ICB. Notes the proposed development would create significant pressure on existing local GP practises and that the policy does not cross refer to Policy COM 17.	LPR-D-272 (BOB-ICB)	Noted. The Council is continuing to engage with the ICB on ways to improve primary care provision in the town that is compliant with CIL regulations.
Policy BAN M/U2: Bolton Road	Support for car free development at town centre sites should be added to the policy. Notes the site lies within an area of archaeological interest and provides information indicating a strong likelihood of medieval remains on the site. Requests an archaeological desk based assessment and field evaluation	LPR-D-302 (Oxfordshire County Council)	Noted. This is addressed by Policy COM 26. Parking will be provided in accordance with the County's requirements.

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Policy BAN M/U2: Bolton Road	Early engagement between the developers and Thames Water would be beneficial to understand drainage requirements on and off site, clarity on the anticipated loading/flow from the development and water requirements on and off site. The council and developers should work alongside Thames Water and recommends that developers attach information provided from Thames Water to their planning applications	LPR-D-079	Noted.
Policy BAN M/U2: Bolton Road	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy BAN M/U2: Bolton Road	Questions if the site is deliverable, having been included in the 2031 plan but not fully delivered	LPR-D-091	There is an extant permission on part of the site. The Council is confident that the allocation is deliverable. It owns a substantial area of the site.
Policy BAN M/U2: Bolton Road	Concerned with the loss of public car parking due to the proposed allocation. Suggests the text requires amending to reflect a more appropriate balance between the Local Planning Authority and the communities' aspirations	LPR-D-186	The Council will ensure that there is adequate public car parking in the town.

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Policy BAN E1: Land at Higham Way	Considers that the level 1&2 SFRAs and the sequential and exception tests do not justify the proposed housing and employment growth in the policy. Notes there is a new national model to be published in Spring 2025 which may impact the site. Does not consider there is sufficient space on the site to deliver the proposed allocation without increasing flood risk elsewhere. Suggests the allocation should be reduced with key findings from the SFRA pulled in	LPR-D-312 (Environment Agency)	Consider the Level 1 and 2 SFRA alongside the Sequential and Exception test do justify the proposed growth set out in the Plan. Acknowledge new data is published and the Council has commissioned an update to the Levels 1 and 2 in light of this to help address the specific concerns raised by the EA in respect of flood data. The flood evidence and other documents such as the HELAA, have helped to filter the potential allocations of land for housing and employment. The flood evidence has also helped influence the policy requirements for specific sites in accordance with national policy.
Policy BAN E1: Land at Higham Way	Notes that Banbury Castle is within 500m of the site and therefore there could be medieval remains in the area. Requests an archaeological desk-based assessment and written scheme of investigation to agree the scope of assessment	LPR-D-302 (Oxfordshire County Council)	Noted. This is addressed by Policy COM 26.
Policy BAN E1: Land at Higham Way	Early engagement between the developers and Thames Water would be beneficial to understand drainage requirements on and off site, clarity on the anticipated loading/flow from the development and water requirements on and off site. The council and developers should work alongside Thames Water and recommends that developers attach information provided from Thames Water to their planning applications	LPR-D-079	Noted.

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Policy BAN E1: Land at Higham Way	Supports the policy	LPR-D-083 (Banbury Town Council)	Support noted and welcomed.
Policy BAN E1: Land at Higham Way	Notes the majority of the site is already in active employment	LPR-D-039	Noted. The site could be more intensively used.
Policy BIC 1: Bicester Area Strategy	Considers that the level 1&2 SFRAs and the sequential and exception tests don't justify the proposed housing and employment site growth in the policy. Notes a new national model is to be published in Spring 2025 which may further impact some of the sites. Whilst flood risk is mostly to remain in bank, sites BIC H1 and BIC E2 should be assessed through a level 2 SFRA. Bic E1, Bic E3, and Bic E4 should be assessed as ordinary watercourses run through them	LPR-D-312 (Environment Agency)	Consider the Level 1 and 2 SFRA alongside the Sequential and Exception test do justify the proposed growth set out in the Plan. Acknowledge new data is published and the Council has commissioned an update to the Levels 1 and 2 in light of this. Additional Level 2 SFRAs have been commissioned for BIC E1, BIC E2 and BIC E3 given the change in flood risk.
Policy BIC 1: Bicester Area Strategy	Supports the policy	LPR-D-274 (Historic England) LPR-D-321	Support noted and welcomed.
Policy BIC 1: Bicester Area Strategy	Supports the retention of Bicester 13	LPR-D-145 LPR-D-146	Support noted and welcomed.
Policy BIC 1: Bicester Area Strategy	Supports the retention of Bicester 12	LPR-D-225	Support noted and welcomed.

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Policy BIC 1: Bicester Area Strategy	Supportive, however considers that additional employment sites should be allocated. Notes tables in Policy BIC 1 and LEC 1 do not correlate	LPR-D-152	Welcome support. Policy LEC 1 will be updated for clarity
Policy BIC 1: Bicester Area Strategy	Supports the policy but considers additional allocations are needed at Bicester	LPR-D-165	Welcome support, consider sufficient allocations are provided in the district.
Policy BIC 1: Bicester Area Strategy	Supports the strategic objectives for the Bicester area. Notes it is unclear whether the allocations proposed to be retained are saved or if they will be replicated in the 2042 plan, this should be made clear. Supports the 7500 homes for North West Bicester but objects to the delivery rates as they could be delivered almost entirely in the plan period	LPR-D-237	The existing allocations are to be retained. Policy BIC H1 replaces the existing NW Bicester allocation. The delivery rate at NW Bicester is considered to be realistic and should the rate increase, those houses would simply be added to the supply.
Policy BIC 1: Bicester Area Strategy	There is potential to have a new healthcare facility at North West Bicester. Any new provision must be financially and operationally viable to the ICB. The ICB would object to any proposed developments if they are not financially and operationally viable	LPR-D-272 (BOB-ICB)	BOB ICB were consulted as part of the IDP regarding health care needs and the overall strategy for Cherwell. Only BIC H1 refers to a GP surgery and dental surgery.
Policy BIC 1: Bicester Area Strategy	Bicester centre has high potential for archaeological remains. Notes that Alchester Roman Town is south west of the town and that Bicester's heritage is rich and can be enhanced	LPR-D-302 (Oxfordshire County Council)	Comments noted. The allocations require archaeological investigations as appropriate.
Policy BIC 1: Bicester Area Strategy	Generally positive regarding the Local Plan, suggests that walking, cycling and the building of services are prioritised	LPR-D-014	Comments welcomed and recognise that walking, cycling and service provision is set out clearly for each allocation and for the wider area.

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Policy BIC 1: Bicester Area Strategy	Notes that the Local Plan lacks mention to Bicester's Garden Town principle. Suggests this should be reassessed. Notes shortcomings in meeting broader environmental standards. Notes the impacts of flooding in Wendlebury	LPR-D-015	Bicester's Eco-Town principles remain. Do not consider the Plan has shortcomings in environmental standards and elsewhere in the Plan, high standards are set for all development.
Policy BIC 1: Bicester Area Strategy	Queries the aspiration to become a Garden Town	LPR-D-123 LPR-D-119	There has been a shift away from Garden Town aspirations, whilst still valid, to foster Eco Town principles at NW Bicester.
Policy BIC 1: Bicester Area Strategy	Additional housing should be focussed at Bicester	LPR-D-223 LPR-D-105 LPR-D-107	Consider that the focus of housing development is at Bicester within this plan with existing commitments yet to be built out during the plan period.
Policy BIC 1: Bicester Area Strategy	Highlights the case for exploring a higher growth scenario to support economic growth and housing to support this. Promotes a site to be allocated for residential development	LPR-D-224	Comments noted. The local housing need is considered an appropriate basis upon which to plan for future growth. Note omission site.
Policy BIC 1: Bicester Area Strategy	Objects to more development in Bicester	LPR-D-042 LPR-D-028 LPR-D-044 LPR-D-056 LPR-D-085	Comments noted.
Policy BIC 1: Bicester Area Strategy	Objects to more development in Bicester for reasons including a lack of infrastructure, services, jobs, pollution, housing and traffic levels	LPR-D-059 LPR-D-081 LPR-D-104 LPR-D-129 LPR-D-261 LPR-D-337 LPR-D-087	Comments noted. The level of development being planned for has been considered in the context of infrastructure required. The supporting evidence has assessed wildlife, flooding and drainage risk and traffic levels. Mitigation will be required where necessary.

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Policy BIC 1: Bicester Area Strategy	Objects due to concerns over road infrastructure, wildlife, drainage, flooding and the expansion of North West Bicester eco-town	LPR-D-124	Comments noted. The level of development being planned for has been considered in the context of infrastructure required. The supporting evidence has assessed wildlife, flooding and drainage risk and traffic levels. Mitigation will be required where necessary.
Policy BIC 1: Bicester Area Strategy	Comments concern over the lack of infrastructure, flooding, sewage systems and wildlife and how these issues will worsen with new development	LPR-D-125	Comments noted. The level of development being planned for has been considered in the context of infrastructure required. The supporting evidence has assessed wildlife, flooding and drainage risk and traffic levels. Mitigation will be required where necessary.
Policy BIC 1: Bicester Area Strategy	Comments concern with bottlenecks at J9 from the A34, A41 and M40 and the creation of a rat run through Wendlebury. Considers the allocated employment land will exacerbate the issue.	LPR-D-219 (Wendelbury Parish Council)	The Plan is subject to transport modelling which will identify any necessary mitigation measures.
Policy BIC 1: Bicester Area Strategy	Considers the scale of proposed employment sites is concerning due to traffic levels and the impact on traffic infrastructure. The impact on Chesterton, Little Chesterton and Wendlebury must be considered	LPR-D-327	The Plan is subject to transport modelling which will identify any necessary mitigation measures.
Policy BIC 1: Bicester Area Strategy	Roads are unmanageable for what is planned for Bicester	LPR-D-245	Comments noted. The supporting evidence has assessed traffic levels. Mitigation will be required where necessary.
Policy BIC 1: Bicester Area Strategy	Concerned regarding the deliverability of North West Bicester, the 5 year housing land supply, lack of infrastructure and the Puy du Fou proposal	LPR-D-257	Comments noted. Whilst the Council cannot currently demonstrate a five year housing supply, it is expected that the Council will have a positive land supply on adoption of the Plan. Consider that the supporting Infrastructure Delivery Plan seeks to ensure that the necessary infrastructure is defined and how this will be provided to support the development. Planning applications which have not yet been determined, will not have been taken into account in the assessment of infrastructure and capacity on services.

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Policy BIC 1: Bicester Area Strategy	Considers that the first phase of BIC H1 (500 homes) could be deliverable within the plan period and requests the policy is expressed as a minimum. Notes that neither the plan or the topic paper provide a detailed breakdown of the supply and requests anticipated delivery is included on the retained policies	LPR-D-266	The Plan has sought to identify a realistic delivery capacity within the Plan period up to 2042. It is not viewed as a maximum figure and any capacity above this would simply be added to the overall supply.
Policy BIC 1: Bicester Area Strategy	The vision is too reliant on leisure and retail for employment opportunities. Notes concerns regarding congestion	LPR-D-080	Disagree. The Plan provides sufficient employment land which is focussed on more traditional employment opportunities.
Policy BIC 1: Bicester Area Strategy	Strongly supports the policy. Needs to ensure that adequate strategic infrastructure is delivered alongside new development	LRP-D-222	Agree. Consider that the supporting Infrastructure Delivery Plan seeks to ensure that the necessary infrastructure is defined and how this will be provided to support the development.
Policy BIC 1: Bicester Area Strategy	Paragraph 5.11 mentions the role of Bicester Motion in the area's economic growth, but that central government support is required for it to be internationally competitive	LPR-D-026	Noted
Policy BIC 1: Bicester Area Strategy	Objects due to impacts of traffic, lack of infrastructure and the focus on low paid retail employment. Notes concern over crime rates and littering. Suggests there should be more elderly apartment blocks and suggests solar panels on roofs of factories rather than on agricultural land	LPR-D-081	Points noted. The Plan seeks high levels of design which should assist with crime rates. Policies provide for elderly persons accommodation.

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Policy BIC 1: Bicester Area Strategy	Objects to paragraph 5.11 and considers it to be unreasonable to lose Bicester's market town identity and heritage. The town centre needs a range of local independent shops with reduced rents and rates to thrive. Suggests all buildings have solar panels and an attractive design. Suggests amendments to the policy	LPR-D-111	Comments noted. There is a town centre first approach, but retail centres across the country are suffering. Rent levels are beyond the scope of the plan, though regeneration initiatives can be used to support and encourage the vitality of towns. The Plan cannot require solar panels to be provided retrospectively.
Policy BIC 1: Bicester Area Strategy	The council's Playing Pitch Strategy includes a number of recommendations for Bicester including ensuring that if Bicester Rugby Club cannot continue to be accommodated at Whitelands Farm than an alternative site is allocated within the plan. Notes additional changing provision is required to support the rugby club. Requests that infrastructure allocations are included in the evidence base for Bicester.	LPR-D-191	There is nothing to prevent a planning application coming forward for an alternative site in line with the Plan policy on the loss of sports provision.
Policy BIC 1: Bicester Area Strategy	There is the potential for an interface between the land allocated for Graven Hill and land potentially required to support the delivery of EWR	LPR-D-243	Comments noted. This can be considered further through the site specifics of a planning application and how the site is orientated.
Policy BIC 1: Bicester Area Strategy	Notes Ambrosden is identified within this area strategy but is also part of the rural areas, requests clarification as to what the proposed status of the land identified as a committed housing site is as it is not proposed as an allocation within the Local Plan. Promotes site off Ploughley Road for residential development	LPR-D-300	The strategy for development at Bicester may include land at Ambrosden and within other parishes.

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Policy BIC 1: Bicester Area Strategy	The policy should acknowledge Caversfield as a suburb that plays a critical role in the town	LPR-D-211	Disagree. Caversfield is a separate settlement.
Policy BIC 1: Bicester Area Strategy	Concern regarding impact on air pollution and highways safety in Islip due to the proposed development. Objects to the stance that development would cluster homes/work/services and reduce car journeys	LPR-D-157	The Plan does not propose development in the Islip area.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Supports the policy	LPR-D-298	Support noted and welcomed.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Supports the policy and suggests improvements including greater connections between the town centre and Bicester Village	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. CLPR's Bicester Area Strategy p 11 and paragraph 5.35 p 214 support strengthening connections and legibility between the town centre and Bicester Village. Supporting text Policy BIC 3 indicates the package of measures identified in the policy may be further refined through development of the Movement and Place Strategy being developed by OCC. This can then be added to the yearly update of the Infrastructure Delivery Plan.

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Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Supports recognition that all development will contribute to necessary infrastructure. Requests recognition of the need for contributions to be necessary to make the development acceptable in planning terms, directly related to the development and reasonably related in scale. Suggests that safeguarded routes in the Oxfordshire County Council Bicester Area Strategy are included in the Local Plan	LPR-D-286	Support noted and welcomed. Development contributions are sought in compliance with the NPPF and CIL Regulations planning obligations tests. Safeguarding of transport infrastructure has been informed by OCC's advice including the safeguarding of Bicester's SEPR.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Welcomes the clarification regarding development providing financial contributions but requests further clarification as to whether contributions are for certain infrastructure projects or only those relevant to the development site	LPR-D-165	Noted. Contributions will be sought to support funding of infrastructure needed to deliver the Local Plan. Some contributions will be directly related to a specific development proposal while other maybe a contribution to identified strategic infrastructure needed to deliver and/or mitigate growth planned in a wider area.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	The need for all development to contribute towards transport improvement schemes is welcomed, but notes there are existing constraints which need to be mitigated	LPR-D-222	Support noted and welcomed. The Council has worked in collaboration with infrastructure providers and prepared an Infrastructure Delivery Plan setting out the infrastructure needed to deliver the CLPR strategy including mitigation, when it is needed, how much it would cost and how it will be delivered.

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Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Notes that the Local Plan Review does not appear to consider how bus service improvements could operate on the A41 east of Bicester towards Aylesbury, which they would welcome. Comments concern about the impact of new development on the A41 corridor to Aylesbury. Notes there is a need for an A41 Corridor Technical Study to consider the cumulative impact of planned and speculative proposals. Would like to work closely on sustainable transport options and cohesive networks including footpaths and cycle routes	LPR-D-108 (Buckinghamshire Council)	Noted. OCC commissioned the A41 Corridor Study, July 2022 and are progressing a Corridor Travel Plan for the A41 and a Movement and Place Strategy (MAPS) for Bicester. Transport evidence supporting the CLPR includes the Transport modelling and Bicester Transport Topic Papers published for consultation in December 2024. A number of measures on the A41 have already been delivered including Ploughley Road/A41 junction improvements and the widening of the A41 (Oxford Road corridor). The role of the proposed South East Peripheral Road and measures on the Eastern Peripheral Corridor is to reduce vehicular movements along the A41 and wider area. Capacity improvements are aimed at improving the operation of public transport. We will continue to work with Buckinghamshire Council as the CLPR progresses to adoption and during the preparation of OCC's emerging corridor strategies and Bicester MAPS.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Comments that there are no upgrades to the existing roads	LPR-D-029	Disagree. Policy BIC 2 includes priority measures on the road network to facilitate public transport and corridor improvements. Bicester Transport Topic Paper published for consultation in December 2024 provides further details.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Objects to the omission of the Strategic Link Road, safeguarding for this should be included	LPR-D-237	Disagree. Delivery of this transport scheme is appropriately addressed in Policy BIC H1 North West Bicester and supporting evidence.

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Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	The policy is unsound as there is no guarantee that this significant infrastructure will be delivered within the Plan Period	LPR-D-152	Disagree. The Council has worked in collaboration with infrastructure providers and prepared an Infrastructure Delivery Plan setting out the infrastructure needed to deliver the CLPR strategy, when it is needed, how much it would cost and how it will be delivered.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	The need for all development to contribute towards transport improvement schemes is welcomed, but notes there are existing constraints which need to be mitigated	LPR-D-222	Noted. Cherwell operates in a two-tier local government structure. Cherwell and Oxfordshire Councils work collaboratively to ensure the integration of land use and transport plans and identification, and delivery of infrastructure needed to support the CLPR. This is detailed in the CLPR Infrastructure Delivery Plan.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Explicit wording should be included to identify that policies such as BIC 2 would not be applicable to sites where planning permission has already been secured.	LPR-D-225	Disagree. The suggested change is unnecessary. Permitted development is outside the scope of Policy COM2 and will be delivered in accordance with the agreed S106 and conditions attached to the permission.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Generally supports the policy, suggests wording to capture the full extent of the works for the realignment of Howes Lane. Objects that North West Bicester should contribute towards 4 transport schemes	LPR-D-321	Noted Development contributions are sought in compliance with the NPPF and CIL Regulations planning obligations tests. The policy provides an appropriate level of detail while design work for the Howes Lane realignment progresses. Scheme ID 141 of the Infrastructure Delivery Plan prepared in collaboration with Oxfordshire County Council provides the details for this scheme.

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Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	The priority of completing the Howes Lane project should be emphasised. The South East Perimeter Road should be considered in light of policies to manage future transport demand and the routing of the road should be carefully considered to minimise the impact on Wendlebury and Merton	LPR-D-321	Noted. The Infrastructure Delivery Plan makes clear the timing for infrastructure delivery including Howes Lane Diversion/Strategic Link Road. Measures are included to address traffic impact on rural roads.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	The role of Heyford Park and Bicester as key centres of growth are welcomed, as is the intention for Bicester to expand and continue transforming into a 'Garden Town'. The significant level of housing and population growth for Bicester is welcomed. The reference to efforts to improve connectivity at M40 J9 and J10 is noted	LPR-D-298	Noted and welcomed.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	The policy will have a detrimental effect on the population outside Bicester. The proposed developments will increase the traffic on rural roads	LPR-D-273 (Weston on the Green Parish Council)	Noted. Measures are included to address traffic impact on rural roads.

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Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Most new allocations will rely on road traffic. Considers there is a failure to address traffic bottlenecks e.g. J9 and that there are no provisions for new rail, cycleways or other active travel	LPR-D-015	Disagree. Plan policies and in more detail the Infrastructure Deliver Plan address road and public transport and active travel infrastructure required to deliver the Plan.
Policy BIC 2: Delivery of Strategic Transport Schemes within the Bicester Area	Notes there is no specific mention of areas being improved for the development north of Southam Road. Improved and safe routes into the town from Hanwell Fields is required	LPR-D-168	This policy relates to Bicester not Banbury. Plan policies and in more detail the Infrastructure Deliver Plan address road and public transport and active travel infrastructure required to deliver the Plan.
Policy BIC 3: Safeguarding of Land for Strategic Transport Schemes in the Bicester Area	Doesn't object to the safeguarding of land for the Bicester South East Perimeter Road but expresses concern about potential impacts of the road on Scheduled Monuments Associated with Alchester.	LPR-D-274 (Historic England)	Noted. OCC are currently progressing the Bicester Movement and Place Strategy. Historic England's views have been shared with OCC to inform next stages of scheme development regarding the SEPR. The Council will continue to work with Historic England on CLPR matters and heritage evidence.

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Policy BIC 3: Safeguarding of Land for Strategic Transport Schemes in the Bicester Area	Supports the policy, suggests editorial corrections. Notes that the role of the South East Peripheral Road will be confirmed through Movement and Place Strategies work. The provision of a new road would need to be delivered alongside transformational changes to the existing network. Comments the SEPR is referred to in the plan as both 'perimeter' and 'peripheral', requests consistency	LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed. South East Perimeter Road is the title given in the current transport area strategy for Bicester. Editorial changes are included in the Proposed Changes list to reflect new referencing to the SEPR (South East Peripheral Road). Minor editorial improvements can be undertaken following the CLPR examination.
Policy BIC 3: Safeguarding of Land for Strategic Transport Schemes in the Bicester Area	The South East Perimeter Road safeguarding is identified on the policies map and crosses the existing railway line and land safeguarded for EWR. No further details are provided in the IDP or Transport Topic Paper. This issue should be explored further	LPR-D-243 (East-West Rail)	Noted. The NPPF requires policies to identify and protect sites and routes which could be critical in developing infrastructure. Improvements to the peripheral routes serving Bicester have been and continue to be an integral part of Oxfordshire County Council's policy requirements for Bicester. The provision of a South East Peripheral Road (SEPR) is one of a number of long term schemes identified by the County Council within the Transport Strategy for Bicester as being essential in order to facilitate the town's future growth. The SEPR is identified in the Oxfordshire Local Transport and Connectivity Plan area strategy for Bicester (Policy BIC1). The scheme is clearly identified in the CLPR and its transport and infrastructure evidence and a vehicular bridge over the railway is already in place. Safeguarding of the route in the CLPR will ensure land is available while the County Council continue to refine transport improvements in the eastern peripheral corridor of Bicester and undertake the necessary engagement with stakeholders including East-West Rail.

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Policy BIC 3: Safeguarding of Land for Strategic Transport Schemes in the Bicester Area	Comments concern over the deliverability of the South East Perimeter Road during the plan period	LPR-D-152	Noted. Infrastructure Delivery Plan provides details on costs, timeframes and delivery of the SEPR.
Policy BIC 3: Safeguarding of Land for Strategic Transport Schemes in the Bicester Area	Considers the plan should improve the ring road on the west of Bicester. Notes support for the realignment of Howes Lane and the bridge under the railway	LPR-D-014	Noted.
Policy BIC 3: Safeguarding of Land for Strategic Transport Schemes in the Bicester Area	Considers the proposed perimeter road north of Wendlebury would isolate the village and prevent access to the countryside. Considers Wendlebury will experience more rat-running and noise/air pollution.	LPR-D-015 LPR-D-219 (Wendlebury Parish Council)	Noted. Mitigation measures have been identified to address potential rat running through the villages and maintaining Wednesbury's connectivity. The CLPR safeguards land for the road with further road planning and feasibility to be undertaken by Oxfordshire County Council.
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	Supports the policy but considers that the creation of an urban edge park should be included in the policy	LPR-D-302 (Oxfordshire County Council)	It is included in the first bullet point of Policy BIC 4.

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Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	Notes there is intention to create an urban edge park by protecting existing green spaces and securing new specific open space. Suggests the intended or potential route should be shown and requests clarification on how it will be implemented	LPR-D-291	Noted. Policy BIC 4 provides a clear description of the elements that would comprise the route. Following CLPR adoption, with the place strategies and allocations in place, the Council can review green and blue infrastructure alongside the emerging Local Nature Recovery Network and the yearly updates to the Infrastructure Delivery Plan.
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	Objects to the omission of Bucknell and North West Bicester in the policy	LPR-D-023	Policy BIC 4 bullet point 4 includes the extension and enhancement of green and blue infrastructure connections outwards from Bicester including connections to Ardley cutting and Quarry SSSI along the railway line within Bucknell and North West Bicester.
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	Notes that the Bicester Strategy document refers to Landford Meadows and Bicester fields as both being in the same place. It was renamed Langford Park last year and requests amendment to the wording	LPR-D-111	Noted. Minor editorial improvements can be addressed following the CLPR examination.
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	The Gavray Drive allocation includes a LWS, CTA and proposed LGS however the emphasis on re-naturalisation in BIC 4 is not fully aligned with the saved policy Bicester 13. Suggests amendments to the wording	LPR-D-145	Disagree. The planning balance between nature conservation and development needs will be applied at decision making stage when enabling development could be considered.

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Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	It is essential that any schemes are carefully designed to ensure deliverability where their ownership is required	LPR-D-222	Noted.
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	It should be considered how explicit wording can be incorporated into the emerging Local Plan to identify that policies, including BIC 4, would not be applicable to sites where planning permission has already been secured. Suggests amendments to the wording	LPR-D-225	Disagree. Permitted development is outside the scope of Policy BIC 4 and will be delivered in accordance with the agreed S106 and conditions attached to the permission.
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	The plan fails to ensure sufficient green infrastructure provisions north of Bicester. Requests amendments to the policy to include a requirement for green infrastructure implementation before development begins	LPR-D-228	Disagree. The Plan should be read as a whole including the requirements of Policy CSD 11, CSD 12 CSD 13, CSD 14 and CSD 15 on protection and enhancement of biodiversity, biodiversity net gain natural capital and green and blue infrastructure, and site-specific requirements in the CLPR site allocations policies. The Infrastructure delivery Plan provides information on infrastructure funding and delivery.
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	A specific map of pathways the council has designated green lanes or as part of wider ecological networks is needed. Notes connectivity isn't identified, and blue infrastructure has no protection and is improperly mapped. Considers the proposed relief road south of Graven Hill could isolate Local Wildlife sites and	LPR-D-043	The Green & Blue Infrastructure Strategy maps the G&BI proposals. Following CLPR adoption, with the place strategies and allocations in place, the Council can review green and blue infrastructure alongside the emerging Local Nature Recovery Network and the yearly updates to the Infrastructure Delivery Plan. The CLPR safeguards land for the South East Peripheral Road, design and feasibility work from Oxfordshire County Council will address potential ecological and heritage impacts.

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	therefore wildlife crossings are required. Queries if the duty to cooperate includes consultation with Wildlife Trusts		
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	The plan fails to deal with the proposals for burial lands at North-West Bicester	LPR-D-121	Policy BIC H1 North West Bicester requires cemetery provision.
Policy BIC 4: Delivery of Green and other Strategic Infrastructure in the Bicester Area	The policy unduly limits the delivery of The Reserve in respect of land use.	LPR-D-265	Disagree. The Policy supports restoration and use of the Quarry for outdoor recreation subject to proposals being compatible with the Local Wildlife Site designation and partial SSSI. It will be for the proposals to demonstrate compatibility. The planning balance between heritage and ecology policies and development needs will be applied at decision making stage.
Policy BIC 5: Bicester Opportunity Areas	Considers that the levels 1&2 SFRAs and the sequential and exception tests do not justify the proposed housing and employment growth	LPR-D-312 (Environment Agency)	Consider the Level 1 and 2 SFRA alongside the Sequential and Exception test do justify the proposed growth set out in the Plan. Acknowledge new data is published and the Council has commissioned an update to the Levels 1 and 2 in light of this to help address the specific concerns raised by the EA in respect of flood data. The flood evidence and other documents such as the HELAA, have helped to filter the potential allocations of land for housing and employment. The flood evidence has also helped influence the policy requirements for specific sites in accordance with national policy.

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Policy BIC 5: Bicester Opportunity Areas	Supports the policy	LPR-D-274 (Historic England)	Support noted and welcomed.
Policy BIC 5: Bicester Opportunity Areas	Notes for site 3: London Road Area that the text infers that new parking could be provided as part of the upgrades to East-West Rail and if required further information would be needed as to why this is requested. Considers that there is opportunity to include new waiting and w/c facilities in the area	LPR-D-302 (Oxfordshire County Council)	Noted
Policy BIC 5: Bicester Opportunity Areas	Comments that the option of a new crossing would not be provided due to the nature and extent of the land take. Includes evidence and requests the issue is explored with the council	LPR-D-243	This is a matter to be explored, the Plan has been written in such a way that its provision should be considered as part of any development.
Policy BIC 5: Bicester Opportunity Areas	Objects to the lack of proposed parking for Market Square as this would reduce custom for traders. Considers potholes and road resurfacing should be a financial priority	LPR-D-026	Noted. The Council is progressing a scheme to enhance Market Square which has been subject to separate consultation and engagement.
Policy BIC 6: Former RAF Bicester	Supports the policy	LPR-D-274 (Historic England)	Support noted and welcomed.

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Policy BIC 6: Former RAF Bicester	Suggests the policy is renamed 'Bicester Motion'. Suggests the policy enables the provision of residential development. Notes that the policy and supporting text refer to Elm Farm Quarry rather than Stratton Audley Quarry	LPR-D-265	No reference in the CLPR to Elm Farm Quarry. Renaming of Policy BIC 6 is included in the list of proposed changes to the Plan.
Policy BIC 6: Former RAF Bicester	Opposes conservation at ex-RAF Bicester if this entails noise and air pollution from old cars	LPR-D-026	Noted.
Policy BIC H1: North West Bicester Eco-Town	Notes that the proposed allocation area is larger than that assessed in the Heritage Impact Assessment but that the requirements for HIA in criterion 26 are helpful. Requests amendments to the key design requirements including retention and respect of existing buildings and heritage assets, reinforcement and identification of opportunities to connect with the wider landscape, minimise urbanising effects on the Grade II listed Manor House to the north of the site and consideration of the impacts on rural communities including Bucknell. States that an archaeological desk-based assessment will be required and potentially a field evaluation	LPR-D-274 (Historic England)	Comments noted. Consider that the policy addresses these concerns.

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Policy BIC H1: North West Bicester Eco-Town	States the need for an onsite primary healthcare facility to be built due to the further 4300 dwellings to be delivered beyond the plan period, to ensure an adequate GP service. Objects to the policy unless it is reworded as per text suggested by the ICB to recognise that the ICB has already secured a site to provide healthcare services and some developer contributions at the Himley Village site. Due to the economic climate, the ICB does not consider it would be able to support a new facility that is financially and operationally viable. Requests a turnkey facility to be built.	LPR-D-272 (BOB-ICB)	Comments are noted. BOB ICB were consulted upon the health care requirements for this site as part of the Infrastructure Delivery Plan to understand BOB ICB's long term health provision strategy for Cherwell. It is recognised that there have been some contributions sought as part of a planning application. However, retention of the reference for healthcare services is essential to ensure that this policy requirement exists for any changes in circumstances and the Council will continue its dialogue with BOB ICB to ensure that the appropriate health provision can be achieved.
Policy BIC H1: North West Bicester Eco-Town	Requests the addition of a requirement to the policy to mitigate the impact of traffic on nearby villages. It should be ensured that development responds positively to amenity and use of Gagle Brook Primary School, and development proposals should be accompanied by technical reports regarding this. The site is in an area of archaeological interest, notes that surveys and partial evaluations recorded a low level of archaeological remains but further archaeological investigations may be required. Supports policy requirements and suggests improvements to the strategic gap and on green and blue infrastructure	LPR-D-302 (Oxfordshire County Council)	Mitigation measures for the surrounding countryside are included within the policy and additional proposed policy text to mitigate the impact of traffic on nearby villages. Agree that further archaeological evaluations may be required and will add to policy. The consideration of Gagle Brook Primary School can be addressed through the planning application stage.

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Policy BIC H1: North West Bicester Eco-Town	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on/off site, clarity on what loading/flow from the development is anticipated, water supply requirements on/off side. The council and developers should work alongside Thames Water so they can build a detailed picture of what will be built where, gain confidence when development will start and what the phasing will be. Recommends that the developers attach the information Thames Water provide to their planning applications. Notes specific concerns regarding waste water/ water supply network capacity and the need to liaise with Thames Water to determine if a detailed drainage/water infrastructure strategy is required	LPR-D-079	The policy requires the developer to engage with Thames Water so consider this places sufficient emphasis on this element. The Council has liaised with Thames Water and the Environment Agency about the level and location of development through the plan making process.
Policy BIC H1: North West Bicester Eco-Town	Supports the policy	LPR-D-218	Support noted and welcomed.

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Policy BIC H1: North West Bicester Eco-Town	Supports the site allocation in principle, but objects to the current wording. Notes that with the increased site area, there is scope to deliver more than 7,500 homes. In support of a comprehensive approach to delivery but the requirement to submit masterplans and design codes with each application is inappropriate and unrealistic as many of the parcels are significantly progressed. Disagrees with the assumed delivery rates and considers a higher number of homes can be achieved by 2042. Notes there is no supporting text requiring comprehensive collaboration across the land parcels to deliver transport requirements and no mention of the SLR. Requests clarification regarding the 40% green infrastructure provision. Supportive of the community facilities and education requirements. Seeks clarity on the community management organisation mechanism. The adopted illustrative masterplan should be carried forward	LPR-D-237	Masterplan and design codes are an appropriate requirement for a strategic allocation of 7500 homes. Acknowledge points around delivery, although the trajectory assumes a realistic rate of delivery and there is no maximum figure within the plan period. If a greater level of development can be achieved, this will add to the overall housing supply. The community management organisation has been discussed at the Bicester Developer Forum in May 2025. The requirement for 40% Green Infrastructure is a key part of the North West Bicester Eco –Town and the vision for the site to promote healthy lifestyles and a high quality of place.

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Policy BIC H1: North West Bicester Eco-Town	The policy is not legally or procedurally complaint or justified/ consistent with National Policy. Notes, however, that it is positively prepared and effective. Objects to the inclusion of areas of ancient woodland within development sites or allocations that adversely affects ancient woodland and other priority wooded habitats. Notes the site includes 0.5ha of ancient semi-natural woodland and unless this irreplaceable habitat is suitably protected from loss or harm, the policy cannot be legally compliant, justified or sound. States that point 25 wording is insufficiently specific, clear and robust. Notes the site also includes 0.06ha of traditional orchard and several areas of priority deciduous woodland which have protection in the NPPF. Recommends that point 25 wording is amended to retain and protect the ancient woodland with a buffer of at least 15m and utilise new planting to enhance connectivity. Also recommends a new point 26 to enhance and strengthen the traditional orchard, including introduction of additional fruit trees and provide appropriate buffers	LPR-D-082	The site boundary has been drawn to follow natural boundaries, such as field patterns and has not sought to exclude pockets of woodland. That is not to say that these areas would be developed. For example, the retention and protection of Grunthill Copse is set out at Criterion 25. Consider this is an appropriate response to this habitat. It would not be necessary to duplicate the NPPF in this policy to refer to 0.06 hectares of traditional orchard.

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Policy BIC H1: North West Bicester Eco-Town	The policy is considered to be unsound, not justified and states that alternative approaches could be taken by requiring inclusion of policy and spatial planning as set out within the North West Bicester Masterplan and SPD. The policy is not consistent with national policy and does not comply with the NPPF paragraph 192(b). It is unclear as to whether the policy replaces or adds to the requirements of the masterplan and SPD. They should be retained in full and referenced in the policy. There is need for additional mapping and the need for additional policies for wildlife and habitat creation. The recommendations of the 'Ecological Assessment of the Potential Site Allocations' study should be added to the specific policy wording	LPR-D-238	The intention is that a new masterplan be produced to cover the full extent of the allocation. Additional policies for wildlife and habitat creation are not considered necessary, the policy adequately addresses this matter.
Policy BIC H1: North West Bicester Eco-Town	Objects to the allocation	LPR-D-036	Comments noted.
Policy BIC H1: North West Bicester Eco-Town	Objects to the allocation due to the impact on Bucknell, traffic congestion, utilities and infrastructure, flooding and the focus on employment	LPR-D-101 LPR-D-104	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic, flooding, utilities and other infrastructure.
Policy BIC H1: North West Bicester Eco-Town	Objects to the allocation due to a lack of infrastructure, services and traffic issues	LPR-D-056 LPR-D-059	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic, flooding, utilities and other infrastructure.

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Policy BIC H1: North West Bicester Eco-Town	Objects to the allocation due to concern over consequences to transport, infrastructure, utilities, green space and wildlife	LPR-D-070	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic, flooding, utilities, wildlife and other infrastructure. Where necessary, mitigation measures have been required within policy to address and overcome any impacts of development.
Policy BIC H1: North West Bicester Eco-Town	Objects due to increased urban sprawl, insufficient infrastructure, flooding concerns, impact on wildlife, and a lack of provision for the proposed Theme Park	LPR-D-313 LPR-D-030	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic, flooding, utilities, wildlife and other infrastructure. The proposed theme park is not committed development and as such has not been assessed in terms of cumulative impact.
Policy BIC H1: North West Bicester Eco-Town	Objects to the housing numbers proposed for the site	LPR-D-047 LPR-D-125	Comments noted.
Policy BIC H1: North West Bicester Eco-Town	Objects to the additional numbers proposed for North West Bicester due to a lack of adequate infrastructure	LPR-D-051 LPR-D-058 LPR-D-022 LPR-D-047	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic, flooding, utilities, wildlife and other infrastructure.
Policy BIC H1: North West Bicester Eco-Town	Objects to the expansion to 7,500 homes due to a lack of road infrastructure, proximity to Bucknell, and the impacts on wildlife, drainage and flooding	LPR-D-109 LPR-D-025	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic, flooding, utilities, wildlife and other infrastructure.
Policy BIC H1: North West Bicester Eco-Town	Objects to the increasing numbers for the allocation due to the lack of infrastructure. Notes there is conflict with the map in appendix 4, as the allocation is a part of the strategic gap. Suggests wording changes to the policy relating to light pollution	LPR-D-260 (Bucknell Parish Council)	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic, flooding, utilities, wildlife and other infrastructure. Where necessary, mitigation measures have been required within policy to address and overcome any impacts of development. Light pollution potentially arising through any planning application can be assessed using Policy CSD18 and it is not considered necessary to duplicate this here. There is no conflict between Policy BIC H1 and Appendix 4. It is considered appropriate and justified that where allocations contain large areas which are likely to remain as green space and play an important role in preserving distinction between settlements, these are included in the defined strategic gap.

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			This approach is proposed for the strategic gap between North-West Bicester and Bucknell. Given the scale of the development proposed, the area of the defined strategic gap is shown in the policy map for Policy BIC H1. The application of Policy COM 13 in this area is no different to other strategic gaps.
Policy BIC H1: North West Bicester Eco-Town	Objects as specific details of the development are not included	LPR-D-080	The site specific will be presented as part of any planning application. The policy is intended to guide development and set out key requirements.
Policy BIC H1: North West Bicester Eco-Town	Objects due to insufficient measures to prevent coalescence with Bucknell and does not consider adequate road infrastructure	LPR-D-284	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic. Separation with Bucknell is specifically referenced in criterion 23.
Policy BIC H1: North West Bicester Eco-Town	Objects to the site being categorised as a housing allocation, it should be changed to mixed-use	LPR-D-316	Disagree, this is a predominantly residential led development with limited employment relative to its scale.
Policy BIC H1: North West Bicester Eco-Town	Infrastructure is needed for new residents, otherwise car journeys will increase	LPR-D-067	The developments will be required to deliver appropriate infrastructure to meet the needs of the new residents.
Policy BIC H1: North West Bicester Eco-Town	The housing number proposed for the site is too high for reasons including impacts on air, light and noise pollution	LPR-D-023	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic and air quality. Light and noise pollution will be considered through any planning application.
Policy BIC H1: North West Bicester Eco-Town	Notes concern with the site due to inadequate infrastructure and the impact on Bicester and Caversfield	LPR-D-327	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic and other forms of infrastructure.

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Policy BIC H1: North West Bicester Eco-Town	Concern regarding the overlap between the allocation and strategic gap. Recommends the policy is deleted or the strategic gaps are amended so it would not encroach into the allocation	LPR-D-321	Note concerns. Strategic gaps focus on separation and do not prevent development.
Policy BIC H1: North West Bicester Eco-Town	There are more appropriate sites, such as Heyford Park. Notes concern over lack of rail improvements, insufficient sustainable transport provisions, and a likely increase in car dependency which undermines the plan's alignment with national sustainability policies. States that the policy has not proven to offer a 'vision-led' are for growth	LPR-D-210	Disagree, this is an existing strategic allocation which has been expanded beyond that already examined and adopted. The site provides for walking, cycling and public transport opportunities alongside car usage.
Policy BIC H1: North West Bicester Eco-Town	The allocated site has the same outline as planning application 21/04275/OUT and suggests this may point to undue developer influence on the allocation. Suggests an independent examination is required into the transparency of the plan-making process	LPR-D-023	The Plan will be subject to independent examination.
Policy BIC H1: North West Bicester Eco-Town	Suggests masterplans and design codes are submitted with each application to show how it will connect with neighbouring development. Queries how the 40% green infrastructure/open space requirement can be met. Notes concern regarding transport infrastructure and viability. Suggests wording amendments	LPR-D-266	Comprehensive masterplan(s) and design code(s) are required through this policy. The 40% Green Infrastructure requirement is in the adopted policy for NW Bicester and this extension is expected to adhere to that level of provision. The individual and cumulative impact of development in the plan has been assessed in terms of traffic and viability.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BIC H1: North West Bicester Eco-Town	Suggests buffers for development are needed and the strategic gap is ill-defined and needs a clear definition	LPR-D-047	Note concerns. Strategic gaps focus on separation and do not prevent development.
Policy BIC H1: North West Bicester Eco-Town	Notes concern regarding the strategic gap and considers this should prevent all development including managed green spaces/playing fields. Also comments that gaps should require noise and light pollution buffers. The plan should include measures to prevent traffic exiting onto Bucknell Road or Bainton Road	LPR-D-012	Disagree with the proposed amendments which stray beyond the purpose of Green Gaps and its supporting evidence.
Policy BIC H1: North West Bicester Eco-Town	Economic development should be balanced with genuine carbon-neutral development	LPR-D-014	Noted.
Policy BIC H1: North West Bicester Eco-Town	Access to Bucknell Road and Bainton Road should be prevented	LPR-D-047	Noted. Mitigation measures will address impact on rural roads and rat running via rural settlements.
Policy BIC E1: Land East of J9, M40, Bicester	Notes this is the largest employment allocation and that more likely to impact the SRN. Welcomes the safeguarding of land for M40 J9 capacity improvements	LPR-D-200 (National Highways)	Comments noted.

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Policy BIC E1: Land East of J9, M40, Bicester	Welcomes the requirement for a LVIA and HIA but considers these should be separate, not combined. Recommends amendments to the wording to require proposals to be accompanied and influenced by a landscape/visual impact assessment and a heritage impact assessment	LPR-D-274 (Historic England)	The requirements are considered to be clear and are set out in the policy.
Policy BIC E1: Land East of J9, M40, Bicester	Welcomes the reference to traffic calming measures but requests improvements. Notes the SEPR is covered well in the supporting text but the requirement should be made explicit in the policy. Notes the site sits in an area of considerable archaeological interest. Supports policy criteria 29 but suggests improvements including evaluation rather than excavation at this stage. Notes the allocation will adversely affect local character and views/ approach from the M40. Notes the capacity improvements to J9 of the M40 and notes the site will affect the local Public Rights of Way. Criteria 11 should be amended by replacing traffic calming measures with measures to mitigate the impact of traffic on nearby villages. Suggests BIC E1 should be limited in extent to its southern section where it adjoins already permitted development	LPR-D-302 (Oxfordshire County Council)	Consider that the traffic calming measures are appropriate. The policy and text should be read together but agree this could be made clearer. The consultation with the County archaeologist may result in evaluation rather than excavation - it simply is not known at this point.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BIC E1: Land East of J9, M40, Bicester	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on/off site, clarity on the anticipated loading/flow from the development and water supply requirements on/off site. The council and developers should work alongside Thames Water so they can build a detailed picture of what is being built, where to get confidence when that development will start and what the phasing will be. Recommends that the developers attach Thames Water's information provided to their applications.	LPR-D-079	The policy requires the developer to engage with Thames Water so consider this places sufficient emphasis on this element. The Council has liaised with Thames Water and the Environment Agency about the level and location of development through the plan making process.
Policy BIC E1: Land East of J9, M40, Bicester	Objects to the inclusion of areas of ancient woodland within the development sites or any allocation that adversely impacts ancient woodland and other priority wooded habitats. Notes the site includes 0.4ha of unnamed ancient semi-natural woodland and a site of unnamed wood, approximately 2.3ha which is a priority habitat deciduous woodland. Requests the protection for ancient woodland by specifying a minimum 15m buffer but would favour a 50m buffer. Recommends wording amendments to better protect the deciduous woodland	LPR-D-082	The site boundary has been drawn to follow natural boundaries, such as field patterns and has not sought to exclude pockets of woodland. That is not to say that these areas would be developed. the policy makes specific reference to priority habitats and their preservation and enhancement. It would not be necessary to duplicate the NPPF in this policy.

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Policy BIC E1: Land East of J9, M40, Bicester	Considers the policy to be unsound, not justified and not effective. Accepts there is a need for some level of commercial development but considers the overall level of loss of greenfield sites to commercial development to be excessive and not justified. Greater clarity is needed regarding the requirements for wildlife habitat provision. There needs to be a requirement to create a wildlife rich LNR, which the size of should be specified.	LPR-D-238	The detail of a Local Nature Reserve can be worked up to support a planning application and does need to be fully detailed for plan making. Disagree that the loss of greenfield sites is excessive as the sites allocated are to meet identified employment need.
Policy BIC E1: Land East of J9, M40, Bicester	Objects to the site due to traffic, creation of a rat-run, noise and light pollution and flooding	LPR-D-017 LPR-D-018	Traffic impact has been considered, individually and cumulatively, though transport modelling across the district. Noise, light and flooding issues are to be addressed through the policy and specifically through any planning application.
Policy BIC E1: Land East of J9, M40, Bicester	Objects to the allocation due to the potential impact on Chesterton's character, issue of highways access and infrastructure provision. Objects to B8 use as the large buildings don't provide many jobs. The overall developable area should be reduced	LPR-D-281 (Chesterton Parish Council)	The potential impact on Chesterton has been considered and has informed the developable area within this Policy. The inclusion of B8 uses on this site reflects the high need for this type of employment land in the evidence.
Policy BIC E1: Land East of J9, M40, Bicester	Supports the site allocation. Suggests inclusion of 'at least 30 hectares' in the policy. Objects to the requirement to submit a comprehensive strategic masterplan. Suggests deletion of criteria 7-12, 19, 25-32.	LPR-D-318	This is a significant strategic allocation for Bicester and should be subject to a comprehensive masterplan to guide development and provide clarity and certainty. Alongside the adjacent sites this will provide an employment gateway into Bicester.

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Policy BIC E1: Land East of J9, M40, Bicester	The proposed sites do not contain any assessment or mitigation for the additional traffic and impact of waste water and effluent disposal from the sites. The policy should be revised to cover this	LPR-D-006	The individual and cumulative impact of the sites allocated in this plan have been assessed in terms of traffic impact. In addition, there is a range of evidence that assesses these sites and notes the need for mitigation as appropriate. One of these studies is the water cycle study which considers water resources.
Policy BIC E1: Land East of J9, M40, Bicester	Suggests the design and access is amended to increase safety for pedestrians	LPR-D-045	Consider that the pedestrian and cycling facilities have been included with safety in mind in consultation with the Highways Authority.
Policy BIC E1: Land East of J9, M40, Bicester	Considers the site is too far from Bicester and undermines sustainable development principles	LPR-D-039	Disagree. The site is within cycle distance of Bicester and benefits from public transport links.
Policy BIC E1: Land East of J9, M40, Bicester	BIC E1 should be removed from consideration of the approach to BIC E2 and E3	LPR-D-285	Disagree, these sites collectively provide an employment gateway into Bicester and will all load traffic onto the same corridor.
Policy BIC E1: Land East of J9, M40, Bicester	The relationship between employment development plans and policies for CSD9 would fail Wendlebury due to sewage and water issues	LPR-D-325	Disagree. These sites will need to address water issues.
Policy BIC E2: Land South of Chesterton	Welcomes the reference to heritage assets but requests amendments to the wording in relation to the developable area's extent, the need for development proposals to be accompanied by a Landscape/visual impact assessment and heritage impact assessment, consideration of cumulative impacts of the site with Bic E3 on the Chesterton Conservation Area and the need for a desk based archaeological investigation and potential excavation	LPR-D-274 (Historic England)	Comments noted. Consider that the policy addresses these concerns.

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Policy BIC E2: Land South of Chesterton	Requests the addition of a requirement for measures to mitigate the impact of traffic on nearby villages and a requirement to contribute towards the SEPR. Notes the site lies in an area of archaeological interest. Supports criteria 24 but requests it is amended to request evaluation rather than excavation at this stage. Agrees that BIC E1, E2, and E3 should be considered and designed comprehensively. Notes the allocation will change the character and views of the area. The impact on Chesterton and its setting is of concern. The impact on the PRoW and A41 should be considered and lighting should be kept to a minimum. A requirement that adjoining fields should be free from development should be added. Development should be restricted in areas close to the A41 to retain buffers and the more rural setting for Chesterton and Little Chesterton	LPR-D-302 (Oxfordshire County Council)	Consider that the traffic calming measures are appropriate. The policy and text should be read together but agree this could be made clearer. The consultation with the County archaeologist may result in evaluation rather than excavation - it simply is not known at this point. The potential impact on Chesterton has been considered and has informed the developable area within this Policy. It is agreed that the development should consider the relationship with the A41 and also to maintain a buffer with Chesterton and Little Chesterton. The cumulative impact of this and adjacent proposed site allocation on the Chesterton Conservation Area is specifically referenced at criterion 23. The detail of how this can best be achieved will need to be managed through the development management process.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BIC E2: Land South of Chesterton	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on/off site, clarity on the the anticipated loading/flow from the development and water supply requirements on/off site. The council and developers should work alongside Thames Water so they can build a detailed picture of what is being built, where to get confidence when that development will start and what the phasing will be. Recommends that the developers attach Thames Water's information provided to their applications.	LPR-D-079	The policy requires the developer to engage with Thames Water so consider this places sufficient emphasis on this element. The Council has liaised with Thames Water and the Environment Agency about the level and location of development throughout the plan making process.
Policy BIC E2: Land South of Chesterton	Considers the policy to be unsound and not justified. Accepts the need for some level of commercial development in some areas but considers the overall level of loss of greenfield sites to commercial development to be excessive and not justified, especially considering recent commercial development. Suggests there are alternative approaches that could be taken including greater clarity in the requirements for wildlife habitat provision. States the policy needs to ask for the creation of a wildlife-rich LNR of which the size is specified	LPR-D-238	The detail of a Local Nature Reserve can be worked up to support a planning application and does need to be fully detailed for plan making. Disagree that the loss of greenfield sites is excessive as the sites allocated are to meet identified employment need.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BIC E2: Land South of Chesterton	Objects to the site due to the impact on traffic, creation of a rat-run, noise and light pollution and flooding	LPR-D-017 LPR-D-018	Comments noted. The individual and cumulative impact of development in the plan has been assessed in terms of traffic, flooding, utilities, wildlife and other infrastructure. Where necessary, mitigation measures have been required within policy to address and overcome any impacts of development.
Policy BIC E2: Land South of Chesterton	Objects due to the potential impact on Chesterton's character, issues of highways access and infrastructure provision. Objects to B8 use as they do not provide many jobs. The overall developable area needs to be reduced	LPR-D-281 (Chesterton Parish Council)	The potential impact on Chesterton has been considered and has informed the developable area within this Policy. The inclusion of B8 uses on this site reflects the high need for this type of employment land in the evidence.
Policy BIC E2: Land South of Chesterton	Objects to the 9ha developable area. States that the masterplan requirement adds unnecessary complexity and restricts flexibility in delivery. Proposes amendments to the policy	LPR-D-285	Acknowledge that there is a considerable difference in size between the site area and developable area for the employment allocations along the A41 corridor. This reflects the consideration of heritage concerns, flooding, the setting of Chesterton and other relevant matters.
Policy BIC E2: Land South of Chesterton	Notes that the proposed site does not contain any assessment or mitigation for the additional traffic and impact of wastewater and effluent disposal. The policy should be revised to mitigate any impact	LPR-D-006	The individual and cumulative impact of the sites allocated in this plan have been assessed in terms of traffic impact. In addition, there is a range of evidence that assesses these sites and notes the need for mitigation as appropriate. One of these studies is the water cycle study which considers water resources.
Policy BIC E2: Land South of Chesterton	Considers the site is too far from Bicester and undermines sustainable development principles	LPR-D-039	Disagree. The site is within cycle distance of Bicester and benefits from public transport links.
Policy BIC E2: Land South of Chesterton	Notes concern over the deliverability of the site as the site was promoted for residential development	LPR-D-152	The site is available for economic development.

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Policy BIC E3: Land at Lodge Farm, Chesterton	It has not been demonstrated that the allocation can be delivered outside of the flood areas and the site has not been addressed in the SFRA Level 2	LPR-D-312 (Environment Agency)	A level 2 SFRA has been commissioned in response to this comment.
Policy BIC E3: Land at Lodge Farm, Chesterton	Welcomes the reference to heritage assets but suggests wording amendments and alterations. Suggests key design requirement 12's developable area should be softened and pulled back in the northern and eastern extents of the site and management of building height and massing and use of landscaping to strengthen the separation with Chesterton lodge. Suggests planning application requirement 12 includes a requirement for development proposals to be accompanied by a landscape/visual impact assessment and a heritage impact assessment. Suggests key design requirement 13 is amended to ensure that the consideration of the cumulative impact of BIC E3 and E2 on the Chesterton Conservation Area form part of any planning application and on key design requirement 24 that a desk-based archaeological investigation and further investigation of archaeological potential through excavation are used	LPR-D-274 (Historic England)	Welcome support. Agree that the developable area should be pulled back and this is set out in criterion 12. The intention behind criterion 23 is for separate landscape and heritage impact assessments. Agree that the cumulative impact should be considered, and this is required by criterion 24. Archaeological potential also needs to be considered through the planning application process.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BIC E3: Land at Lodge Farm, Chesterton	A requirement for measures to mitigate the impact of traffic on nearby villages should be added. There should be a requirement added for contributions towards SEPR. Notes the site is in an area of archaeological interest and supports criteria 25 but requests amendment to request an evaluation rather than an excavation at this stage. Agrees that BIC E1, E2, E3 should be considered and designed comprehensively. Notes that the allocation will change the character and views of the area and that the impact on Chesterton and its setting is of concern	LPR-D-302 (Oxfordshire County Council)	Criterion 22 does require development to prevent vehicular traffic adversely affecting surrounding communities. The excavation is subject to further consultation with the County archaeologist. Agree that contributions should be sought towards the SEPR and proposed changes to the policy will be provided.
Policy BIC E3: Land at Lodge Farm, Chesterton	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on/off site, clarity on the anticipated loading/flow from the development and water supply requirements on/off site. The council and developers should work alongside Thames Water so they can build a detailed picture of what is being built, where to get confidence when that development will start and what the phasing will be. Recommends that the developers attach Thames Water's information provided to their applications.	LPR-D-079	The policy requires the developer to engage with Thames Water so consider this places sufficient emphasis on this element. The Council has liaised with Thames Water and the Environment Agency about the level and location of development through the plan making process.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BIC E3: Land at Lodge Farm, Chesterton	Considers the policy to be unsound and not justified due to its impact on the natural environment when there are alternative sites with a lesser impact. Objects to the proposed site allocation and the policy due to its major impact on the ability for wildlife to move between the rural areas on East- West Bicester by creating a continuous urbanised area stretching from the M40 corridor to the northern edge of Caversfield. Considers the area should be maintained as greenfield as an ecological corridor and as such the proposed allocation should be removed from the plan	LPR-D-238	Disagree. This site and the adjacent allocations provide the opportunity to o create a high quality employment corridor along the A41 into Bicester and is considered to be acceptable and positive in planning terms. Each of the policies refers to linkages with Priority habitats and wetland habitats along the edges of sites. They also refer to enhancements for biodiversity and connections between the sites.
Policy BIC E3: Land at Lodge Farm, Chesterton	Objects to the site due to the impact on traffic, rat-runs, noise and light pollution and flooding	LPR-D-017 LPR-D-018	Comments noted. The individual and cumulative impact of the sites allocated in this plan have been assessed in terms of traffic impact. Light and noise pollution will be considered alongside any planning application in accordance with policies set out elsewhere in the Plan.
Policy BIC E3: Land at Lodge Farm, Chesterton	Objects due to the potential impact on Chesterton's character, issue of highways access, and infrastructure provision. Objects to B8 as they do not create many jobs. Objects to the developable area which should be reduced	LPR-D-281 (Chesterton Parish Council)	The potential impact on Chesterton has been considered and has informed the developable area within this Policy. The inclusion of B8 uses on this site reflects the high need for this type of employment land in the evidence.
Policy BIC E3: Land at Lodge Farm, Chesterton	Supports the allocation and its alignment with the Oxford-Cambridge Arc. Suggests a minor modification to the text relating to vehicular access and design/layout	LPR-D-278	Support welcomed. The vehicular access requirement is set out within the policy at criterion 3 and the connection o cycleways and pedestrian routes are set out at criterion 6.

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Policy BIC E3: Land at Lodge Farm, Chesterton	The proposed employment sites do not contain any assessment or mitigation for the additional traffic and impact of water and effluent disposal from the sites. The policy should be revised to mitigate any impact	LPR-D-006	The individual and cumulative impact of the sites allocated in this plan have been assessed in terms of traffic impact. In addition, there is a range of evidence that assesses these sites and notes the need for mitigation as appropriate. One of these studies is the water cycle study which considers water resources.
Policy BIC E3: Land at Lodge Farm, Chesterton	Comments express concern on the entrance from the old Roman Road from Chesterton towards Kirtlington	LPR-D-045	Note comments. The policy has been informed by the Heritage Impact Assessment undertaken to consider the potential allocations contained within the Plan.
Policy BIC E3: Land at Lodge Farm, Chesterton	Considers the location to be inappropriate due to it sitting adjacent to a category C village. Considers the constraints on the site will limit deliverability	LPR-D-039	It is not considered that deliverability will be compromised.
Policy BIC E3: Land at Lodge Farm, Chesterton	Given the geographical proximity and shared infrastructure dependencies of BIC E2 and E3 a cohesive policy would ensure coordinated development, consistency in design and sustainability standards and simplifies the planning process. Therefore, the council should produce a single policy that sets out clear and consistent principles for the development of BIC E2 and E3 which establishes a structured approach with flexibility in a defined framework	LPR-D-285	Whilst a joint policy was considered, there are a number of site-specific requirements for each site and it was considered that a separate policy for each allocation provided greater clarity and avoided confusion.

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Policy BIC E4: Land South West of Graven Hill	It has not been demonstrated that the allocation can be delivered outside of the flood areas. Notes that an ordinary watercourse runs through the site. The site has not been addressed in the SFRA level 2. Within planning application requirements section additions are requested regarding a flood risk assessment being informed by suitable ground investigation, and a surface water management framework to maintain run off rates to greenfield rates and volumes with use of Sustainable Drainage Systems in accordance with CSD8	LPR-D-312 (Environment Agency)	Consider the Level 1 and 2 SFRA alongside the Sequential and Exception test do justify the proposed growth set out in the Plan. Acknowledge new data is published and the Council has commissioned an update to the Levels 1 and 2 in light of this to help address the specific concerns raised by the EA in respect of flood data. The flood evidence and other documents such as the HELAA, have helped to filter the potential allocations of land for housing and employment. The flood evidence has also helped influence the policy requirements for specific sites in accordance with national policy.
Policy BIC E4: Land South West of Graven Hill	Comments express concern about bringing this site forward for employment development as the risk of significant residual harm is high. Considers that the site allocation does not form part of a positive strategy for the historic environment and raises concerns regarding the new perimeter road the site requires to be unlocked. States that the Heritage Impact Assessment considers the risk of residual harm to be high after the application of suitable mitigation strategies and the site risks the erosion of the ability to appreciate the Scheduled Monument.	LPR-D-274 (Historic England)	Comments noted. The evidence commissioned on heritage does not preclude development on this site and appropriate mitigation measures have been included within the policy. This site requires the peripheral road to unlock the site and to help relieve traffic congestion across Bicester.

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Policy BIC E4: Land South West of Graven Hill	Requires amendments and provides specific wording including the safeguarding of a corridor for the SEPR and a direct route to the M40. Notes that accessing the site only via the A41 would not be considered acceptable. Highlights that the site sites in area of high archaeological interest and supports criteria 23. States that a full archaeological DBA should be prepared however states that it is likely that significant areas would not be suitable for development. Notes that the allocation encroaches into the countryside and the introduction of an employment use would likely trigger further development in the area. States no development should take place until the SEPR is completed and open to traffic. A requirement should also be added to include measures to mitigate the impact of traffic on nearby villages and it is essential that the allocation is assessed comprehensively	LPR-D-302 (Oxfordshire County Council)	Policy BIC 2 refers to the South East Perimeter Road to connect to the A41 and this then would connect to Junction 9 of the M40. The SEPR would be required to provide the main access to unlock the site. Recognise the heritage constraints of the site and this is reflected in the site area and developable area set out in the policy, alongside other mitigation.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BIC E4: Land South West of Graven Hill	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on/off site, clarity on the anticipated loading/flow from the development and water supply requirements on/off site. The council and developers should work alongside Thames Water so they can build a detailed picture of what is being built, where to get confidence when that development will start and what the phasing will be. Recommends that the developers attach Thames Water's information provided to their applications.	LPR-D-079	The policy requires the developer to engage with Thames Water so consider this places sufficient emphasis on this element. The Council has liaised with Thames Water and the Environment Agency about the level and location of development through the plan making process.
Policy BIC E4: Land South West of Graven Hill	Considers the policy to be unsound and not justified. It is not effective as it does not provide sufficient clarity on what is being provided and does not provide clarity on the Local Nature Reserve and the scale of what is required. Accepts the need for some level of commercial development but that the overall loss of greenfield sites for this is excessive. The policy needs to specify the need for creation of a wildlife-rich LNR with a specified size	LPR-D-238	The detail of a Local Nature Reserve can be worked up to support a planning application and does need to be fully detailed for plan making. Disagree that the loss of greenfield sites is excessive as the sites allocated are to meet identified employment need.
Policy BIC E4: Land South West of Graven Hill	Supports the site allocation in principle but suggests a number of significant amendments including the criteria of the policy and the developable area	LPR-D-286	Welcome support. Recognise that the site area and developable area differ, though this is in response to constraints on the site.

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Policy BIC E4: Land South West of Graven Hill	Comments express concern regarding the deliverability of the proposed allocation for employment due to reliance on the provision of the SEPR and previous dismissal in the Sustainability Appraisal	LPR-D-152	Note comments and recognise that the site requires the SEPR as its main access. The Plan also includes a flexible approach to employment land on non-allocated sites.
Policy BIC E4: Land South West of Graven Hill	Notes the site was assessed in Employment Land Review (2022) and considered unsuitable for development	LPR-D-039	The land was not available for employment use at the time of the 2022 Review.
Policy BIC E4: Land South West of Graven Hill	Considers the proposed south-east link road complicates the deliverability of the site	LPR-D-039 LPR-D-152	Noted. The Link road is a key piece of infrastructure for Bicester.
Policy BIC E4: Land South West of Graven Hill	Comments on the level of pollution at ex RAF Bicester	LPR-D-026	Comments noted.
Policy BIC E5: Land adjacent to Symmetry Park	Suggests amendments to criteria 19, so development proposals need to be accompanied and influenced by a landscape/visual impact assessment and a heritage impact assessment and to criteria 20 to ensure a desk-based archaeological investigation is conducted and further investigation through excavation occurs in consultation with the county archaeologist	LPR-D-274 (Historic England)	Consider the policy, at criterion 19, requires both a landscape and visual impact assessment as well as a heritage impact assessment. Consider criterion 20 requires appropriate archaeological assessment to support a planning application.

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Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy BIC E5: Land adjacent to Symmetry Park	Supports the archaeological works requirements in policy criteria 20. Notes that paragraph 5.80 indicates that sui generis compatible waste sites would also be permitted on the site and therefore sui generis should be added to the list of use classes in this policy	LPR-D-302 (Oxfordshire County Council)	Welcome support. The desired use of the site would be for B2, B8 and E(g) uses to help contribute towards the overall need of employment land as set out in the evidence base. There is a live planning application for B8 uses.
Policy BIC E5: Land adjacent to Symmetry Park	Comments express concern regarding the impact on the A41 corridor due to an increase in traffic levels including HGVs from Bicester to Aylesbury as the road has limited capacity and needs improving. Requests a more strategic technical study of the impacts of development on the A41 corridor which will also inform the required mitigations, improvements, dualling, widening, junction capacity, bus service improvements, and cohesive networks including footpaths and cycle routes	LPR-D-108 (Buckinghamshire Council)	Recognise concerns and the ongoing discussions between Cherwell and Buckinghamshire Councils. The Council has commissioned transport modelling work which considers the loading of additional vehicles onto the highway network, including the A41 and any necessary mitigation will be delivered to support development.

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Policy BIC E5: Land adjacent to Symmetry Park	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on/off site, clarity on the anticipated loading/flow from the development and water supply requirements on/off site. The council and developers should work alongside Thames Water so they can build a detailed picture of what is being built, where to get confidence when that development will start and what the phasing will be. Recommends that the developers attach Thames Water's information provided to their applications.	LPR-D-079	Criterion 22 requires the developer to engage with Thames Water so consider this places sufficient emphasis on this element. The Council has liaised with Thames Water and the Environment Agency about the level and location of development through the plan making process.
Policy BIC E5: Land adjacent to Symmetry Park	Supports the proposed allocation. States more sites should be promoted by the council along the A41	LPR-D-152	Welcome support. The sites have been selected from those promoted to the Council though its call for sites process.

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Policy BIC E5: Land adjacent to Symmetry Park	Objects to the allocation and considers the policy to be unsound, not justified and not effective. The policy does not provide clarity on the requirements for wildlife habitat provision. Comments express concern as to the continued eastwards expansion of Bicester towards the Upper Ray Conservation Target Area. States that the recommendations from the Ecological Assessment of Potential Site Allocations 2024 have not been fully transposed into the policy. The level of loss of greenfield sites to commercial development is excessive. Recommends that the allocation is removed and if it is not, then the recommendations of the Ecological Assessment need to be taken forward. There is a clear need for specific wording to specify that the development design should avoid build development on the on-site lowland meadow priority habitat and buffer this, that indirect impacts on the adjacent Local Wildlife Site and Conservation Target Area are avoided, that offsite solutions for farmland birds are identified, and unless the loss of good quality habitat on much of the site is compensated for on-site, then offsite solutions must be identified. There should be a requirement for the creation of a wildlife-rich LNR with a specified size.	LPR-D-238	Comments noted. Disagree that the level of greenfield loss is excessive. The Plan seeks to meet the identified level of employment land evidenced as needed. Consider that criterion 8 provides sufficient protection for the preservation and enhancement of habitats and species on site and also refers to the creation of new habitats on site specifically a new local nature reserve.

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Policy BIC E5: Land adjacent to Symmetry Park	Objects to the site and feels it is inconsistent with COM 13	LPR-D-327	Disagree.
Policy BIC E5: Land adjacent to Symmetry Park	Suggests 'at least 6ha' should be the available development land. Also suggests other wording changes	LPR-D-317	Agree that there is inconsistency and will be amended. Amend this and other Bicester Employment policies.
Policy KID 1: Kidlington Area Strategy	Supports the policy	LPR-D-274 (Historic England)	Support noted and welcomed.
Policy KID 1: Kidlington Area Strategy	There is potential to have a new healthcare facility at Kidlington. Any new provision must be financially and operationally viable, otherwise the BOB-ICB would object	LPR-D-272 (BOB-ICB)	Noted. The Council has engaged extensively and proactively with BOB ICB during the preparation of the CLPR and its supporting Infrastructure Delivery Plan as shown in Cherwell's Duty to Cooperate Statement of Compliance. Developer contributions are an important source of funding to provide new and improved infrastructure in response to housing and population growth. These must be fairly and reasonably related in scale and kind to the development proposal. We will continue to engage with BOB ICB so that appropriate health provision can be secured and the necessary information included in the Infrastructure Delivery Plan.

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Policy KID 1: Kidlington Area Strategy	Supports the strategy. Notes that the Local Plan Partial Review 2020 sites are proposed to be saved and indicates that the additional homes on these sites should be counted in relation to Oxford's unmet housing need. Notes the current planning application for Oxford United Football Club in the Kidlington area and that it is not mentioned in the plan, but does not seek a change on this. States that Kidlington and the surrounding parishes have a rich archaeological record and that all the partial review sites have been subject to initial archaeological surveys. Supports the position for the future of Blenheim Villa Scheduled Monument.	LPR-D-302 (Oxfordshire County Council)	Comments noted and welcomed. All LPPR 2020 sites but one benefit from permission or resolution to approve. The CLPR proposes 4,400 homes to meet Oxford's unmet needs in the 2020 Local Plan Partial Review saved allocations. The Council will monitor delivery against Oxford's unmet needs on these saved allocations until that requirement is met. The proposed stadium is the subject of a planning application which has yet to be determined. It is not a facility to meet Cherwell's needs. It is not necessary to include within the local plan.
Policy KID 1: Kidlington Area Strategy	It is unclear why land on the fringe of Woodstock has been included in the Kidlington Area Strategy and that inclusion in the Rural Area Strategy would be more appropriate. States that the allocation of 450 homes cannot be reasonably described as modest. The supporting text should explain policy context to the Cherwell Local Plan including that land to the south of Woodstock was previously proposed and rejected by the inspector	LPR-D-290 (West Oxfordshire District Council)	The area covered by Kidlington Area Strategy is noted in CLPR paragraph 6.2. The site allocation has been justified within the context of the CLPR strategy, the Kidlington Area Strategy and based on up-to-date evidence to support it. Reference to 'modest' is made within this context, the CLPR settlement hierarchy and the comparative scale of the allocations proposed within the CLPR to meet the plan's identified housing needs. The Inspector's report for the adopted LPPR 2020 is set within the specific scope of the 2020 plan, Oxford's unmet needs. The Inspector 'fundamental concern' with the site being its separation from Oxford. The Council has had due regard to all representations received in relation to this site including matters referred to by the 2020 LP Inspector in his wider comments regarding this site as shown in the supporting text to Policy KID 1 in paragraph 6.11 of the CLPR. The site allocation was informed by up-to-date evidence on heritage impact and an addendum specific to the setting of the World Heritage Site including 'cumulative effects' in discussion with Historic England. The setting of Woodstock was considered in

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			the Site Landscape Assessment evidence, the study recommendations informed Policy KID H1.
Policy KID 1: Kidlington Area Strategy	Supports the policy and notes that there is a significant disconnect between Kidlington's position in the district and the track record of under delivery of housing in and around Kidlington. Therefore, highlights KID H1 is critical.	LPR-D-267	Support noted and welcomed.
Policy KID 1: Kidlington Area Strategy	Supports the retention of PR6b however notes that key aspects of it are outdated, including that the 670 dwellings represents a likely under-utilisation of the site, that the 50% affordable housing requirement should be subject to viability, that the requirement for an 80/20% split between social rented and intermediate affordable homes should be adjusted in line with Policy COM 2 and that the requirement to replace the golf course should be removed.	LPR-D-212	Disagree. The adopted 2020 Local Plan Partial Part 1 Review 'Oxford Unmet Needs' exceptionally allows for development in the Green Belt having considered reasonable alternatives. The exceptionally high need for affordable homes in Oxford was central to the exceptional circumstances to remove the 2020 Local Plan sites from the Green Belt including PR6b. It will be for the applicant to provide at planning application stage a programme for the submission of proposals and the development of land at Frieze Farm (PR6c) as a replacement golf course before development of land at PR6b commences, or the submission of evidence to demonstrate that a replacement course is not required. Appendix 1 of the CLPR lists the saved policies of the 2020 Plan including all sites allocations and Policy PR2 'Housing Mix, Tenure and Size'. Policy PR2 provides for the mix of housing to be agreed with Cherwell and Oxford City Councils having regard to the most up-to-date evidence on Oxford's housing need and local market conditions. The 2020 Plan policies were subject to viability and was clear on the expected compensatory measures resulting from releasing land from the Green Belt. Policy PR6b does not preclude the provision of a greater number of dwellings subject to all other requirements being met.
Policy KID 1: Kidlington Area Strategy	Objects to the lack of clarity around development within and adjacent to Langford Lane/Technology Park	LPR-D-310	Disagree. There is no lack of clarity in this regard. The CLPR strategy reflects the Council's commitment to support an innovation district centred around Begbroke/Langford Lane/Oxford Airport. This entails the delivery of recently permitted applications at Oxford London Airport, delivery of the Oxford Technology Park (under construction) and the

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			expansion of Begbroke Science Park with 14.7 hectares recently released from the Green Belt for employment use. Delivering on infrastructure commitments and provision of housing and affordable housing to balance homes and jobs creation in Kidlington and north Kidlington area in particular is central to this strategy and supporting a sustainable economy.
Policy KID 1: Kidlington Area Strategy	Suggests accommodating a larger proportion of the housing supply to Kidlington and objects that SE Woodstock should be viewed as a housing site in Kidlington as it is too far. Promotes the addition of bullet points to the policy to promote an enhanced role for Kidlington as a local service centre and develop the cultural and leisure/night-time economy. Also, that the local housing needs of Kidlington should be located in the most sustainable parts of the area.	LPR-D-282	Disagree. The CLPR strategy meets identified needs for residential, commercial and other development without the need to release further Green Belt land. KID H1 lies within the parish of Shipton on Cherwell and Thrupp, included within the Kidlington Area Strategy as noted in CLPR paragraph 6.2. The site allocation has been justified within the context of the CLPR strategy, the Kidlington Area Strategy and based on up-to-date evidence to support it. The site is located within walking distance to primary and secondary schools, cycling distance to a major employment area and on a bus route with frequent bus services to employment areas, the centre of Kidlington, Woodstock and Oxford.
Policy KID 1: Kidlington Area Strategy	Notes that no mention is made regarding the impact on infrastructure and the environment or on developments including OUFC's proposed stadium	LPR-D-196	The CLPR is supported by an Infrastructure Delivery Plan prepared in consultation with infrastructure providers. The CLPR has generic and place specific policies addressing infrastructure provision. The proposed stadium is the subject of a planning application which has yet to be determined. It is not a facility to meet Cherwell's needs. It is not necessary to include within the local plan.
Policy KID 1: Kidlington Area Strategy	Comments express concern over the OUFC proposed stadium and its impact on Kidlington. Queries why the Local Plan is published before the stadium application is determined	LPR-D-197	The proposed stadium is the subject of a planning application which has yet to be determined. It is not a facility to meet Cherwell's needs. It is not necessary to include within the local plan.
Policy KID 1: Kidlington Area Strategy	The plan fails to mention the proposed OUFC stadium and the impact on traffic, or the traffic from a proposed 4000 new homes	LPR-D-333	CLPR addresses the needs identified for sport and recreation in Cherwell. The stadium is a current planning application. It is not considered that it needs to be allocated in the Plan.

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			The 4,400 new homes to meet Oxford's needs were allocated in 2020. The CLPR proposed to save those allocations and secure the delivery of infrastructure identified in that Plan to support their delivery.
Policy KID 1: Kidlington Area Strategy	The Local Plan should review if land should be released from the Green Belt. There will be a great deal of investment in infrastructure in the area from previous allocations and efficient use of this could be used to support the Oxford-Cambridge corridor further. The vision should be reworded, and text should be added to Policy KID 1 to recognise this. Comments that further ambitious strategic growth is required with new employment allocations.	LPR-D-223 LPR-D-193	Disagree. There are multiple references to the Oxford-Cambridge Corridor and its importance in the CLPR most noticeably in the Bicester Area Strategy and the supporting text to employment in Policy LEC1. The recent release of 14.7 has of Green Belt land in the Kidlington Area for employment uses and the employment allocations in Policy LEC1 support strategic employment growth in the Oxford-Cambridge Corridor. The CLPR meets identified needs for residential, commercial and other development without the need to release further Green Belt land.
Policy KID 1: Kidlington Area Strategy	There are potential interfaces between parts of PR6a, 6b, 6c, 7a and land safeguarded for EWR. Suggests this issue should be explored	LPR-D-243	Noted. Land for East-West Rail has been safeguarded in the CLPR. The Council will continue engagement with East-West Rail to explore the interface with saved PR policies.
Policy KID 1: Kidlington Area Strategy	Comments on a direct route from Yarnton to Kidlington along Sandy Lane and the relocation of Oxford United Football Club	LPR-D-027	Noted. Transport connections between Yarnton and Kidlington are addressed in adopted Local Plan Partial Review 2020 Policy PR4a Sustainable Transport. The policy is proposed to be saved as shown in Appendix 1 of the CLPR. The infrastructure associated with this policy is included in the adopted and emerging Infrastructure Delivery Plans. The proposed stadium is the subject of a planning application which has yet to be determined. It is not a facility to meet Cherwell's needs. It is not necessary to include within the local plan.
Policy KID 1: Kidlington Area Strategy	In relation to LEC 1, KID 1 allocates 14.7ha of employment land with Policy PR8, so has the effect of bringing forward the allocation of the land. This is strongly supported	LPR-D-346	Noted and welcomed.

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Policy KID 1: Kidlington Area Strategy	The wording needs to be amended to remove any doubt. E.g. the plan refers to retained policies but the glossary only to saved policies. The plan must refer to them being saved	LPR-D-092	Noted. Wording has been amended to avoid ambiguity
Policy KID 2: London-Oxford Airport	The policy has not taken into account the comments submitted on behalf of the airport at Regulation 18 stage. States that the airport should be allocated employment land and Policy KID 2 should provide a greater degree of support for the development of aviation and other employment generating uses	LPR-D-293	Disagree. Identified needs for residential, commercial and other development have been accommodated without the need to release further Green Belt land. London Oxford Airport benefits from permitted development rights for airport related development on its operational land. Policy KID 2 supports the continued use of LOA for commercial aviation and ancillary uses and guides proposals affecting the airport's operations.
Policy KID 3: Delivery of Transport Schemes within the Kidlington Area	Welcomes the policy but notes that the Botley Farm DCO redline area and cable route appear to be adjacent to or overlapping Policies KID 3 and KID H1	LPR-D-302	Noted. Botley Farm cabling route does not prevent the delivery of these policies.
Policy KID 3: Delivery of Transport Schemes within the Kidlington Area	The policy provides no action plan to ensure active travel delivery is appropriate or acceptable. Cherwell District Council and Oxfordshire County Council should work with the parish to establish suitable transport schemes for the area. Notes infrastructure improvements are required to bus services, walking/cycling routes and a mobility hub should be duplicated at the Parkway Station	LPR-D-093 (Kidlington Parish Council)	Noted. Proposed transport schemes are shown in the Transport Topic Papers published in December 2024 and the Infrastructure Delivery Plan (IDP) supporting the CLPR. The IDP provides further information on infrastructure costs, funding and delivery. A Movement and Place Strategy is being prepared by Oxfordshire County Council for the Kidlington Area and a Kidlington Framework being prepared by Cherwell's Growth and Economy Department.

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Policy KID 3: Delivery of Transport Schemes within the Kidlington Area	Comments on the direct route from Kidlington to Yarnton along Sandy Lane and the implications if the level crossing were to close	LPR-D-027	Noted. Transport connections between Yarnton and Kidlington are addressed in adopted Local Plan Partial Review 2020 Policy PR4a Sustainable Transport. The policy is proposed to be saved as shown in Appendix 1 of the CLPR. The infrastructure associated with this policy is included in the adopted and emerging Infrastructure Delivery Plans.
Policy KID 4: Kidlington Area Strategy- Green and Blue Infrastructure	Supports the policy	LPR-D-274 (Historic England) LPR-D-302 (Oxfordshire County Council)	Support noted and welcomed.
Policy KID 4: Kidlington Area Strategy- Green and Blue Infrastructure	Notes that the 'green ring' proposal is not included and should also be designated as a Local Green Space	LPR-D-093 (Kidlington Parish Council)	All proposed LGS have been assessed (Local Green Space Study 2023 and addendum 2024). Only those that meet the necessary criteria have been included within the Plan.
Policy KID 4: Kidlington Area Strategy- Green and Blue Infrastructure	A 'green ring' of interconnected spaces around Kidlington should be included in the plan	LPR-D-338 LPR-D-148 LPR-D-093	Noted. Cherwell prepared a Green and Blue Infrastructure Strategy (2022) in consultation with key stakeholders and available for comment alongside the Local Plan. It provides a sound evidence base to justify green and blue infrastructure requirements addressing challenges and opportunities specific to Kidlington. Following CLPR adoption, with the place strategies and allocations in place, the Council can review green and blue infrastructure alongside the emerging Local Nature Recovery Network and the yearly updates to the Infrastructure Delivery Plan.

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Policy KID 4: Kidlington Area Strategy- Green and Blue Infrastructure	Objects to the removal of Land at The Moors as a housing allocation with plans for the Cricket Club. This should be reinstated. The sports need at Stratfield Brake should also be amended	LPR-D-294	Disagree. The CLPR is able to meet housing, employment and other needs without further release of Green Belt land and justified by evidence. The CLPR has been informed by an up to date Playing Pitch Strategy. Although the strategy acknowledges the Cricket Club's desire to relocate, it does not identify a need.
Policy KID 5: Development within and adjoining Kidlington Village Centre	The plan makes no commitment to update and maintain the Kidlington masterplan and there is no SPD covering issues common to Kidlington and surrounding parishes due to the population increase in the area. A commitment to this should be added. Would like to see more emphasis on the development west of Oxford Road, north of redeveloped Exeter Close. The village centre boundary should be extended to include this	LPR-D-093 (Kidlington Parish Council)	Noted. The Council's town centre and retail study does not recommend the extension of the village centre boundary as suggested. A Movement and Place Strategy is being prepared by Oxfordshire County Council for the Kidlington Area and a Kidlington Framework being prepared by Cherwell's Growth and Economy Department.
Policy KID H1: South-East of Woodstock	Supports the policy	LPR-D-218	Support noted and welcomed.
Policy KID H1: South-East of Woodstock	Notes that the site is in an area of considerable archaeological potential and interest. Agrees with the summary of archaeological potential of the site in the Local Plan.	LPR-D-302 (Oxfordshire County Council)	Noted and welcomed.
Policy KID H1: South-East of Woodstock	No objection to the site allocation subject to amendments to the key design and planning application requirements with	LPR-D-274 (Historic England)	Noted. Modifications to improve the wording of the policy requirements can be addressed following the CLPR's examination. The Council will continue to work with Historic England on CLPR matters and heritage evidence.

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	regards to Blenheim World Heritage Site and Blenheim Roman Villa.		
Policy KID H1: South-East of Woodstock	Supports the allocation and considers it to be a sustainable location but notes disagreement with the requirements including the density, planning obligation and inflexible policies	LPR-D-267	Support noted and welcomed. Policy requirements are evidence led and reflect the need to respond to the site's heritage and landscape context.
Policy KID H1: South-East of Woodstock	Considers a proper analysis of the site has been undertaken. Notes that the health and education contributions should be on site. Makes reference to February 2024 ICOMOS Technical Review to provide context for KID H1	LPR-D-350	Noted. Council aware of ICOMOS Technical Review, further heritage impact evidence commissioned in consultation with Historic England specific to Blenheim's World Heritage Site and its Outstanding Universal Value. Requirements have been informed by and assessment of need and the infrastructure providers' requests and their involvement in the CLPR Infrastructure Delivery Plan.
Policy KID H1: South-East of Woodstock	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on/off site, clarity on the anticipated loading/flow from the development and water supply requirements on/off site. The council and developers should work alongside Thames Water so they can build a detailed picture of what is being built, where to get confidence when that development will start and what the phasing will be. Recommends that the developers attach Thames Water's information provided to their applications.	LPR-D-079	Noted. Thames Water representation and input through the preparation of infrastructure evidence supporting the CLPR have been incorporated in the Plan's Infrastructure Delivery Plan.

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Policy KID H1: South-East of Woodstock	Refers to the February 2024 ICOMOS Technical Review to provide context for KID H1	LPR-D-349 (Environment Agency)	Noted. Council aware of the Technical Review provided to the States Party (Historic England). Further heritage impact evidence commissioned in consultation with Historic England specific to Blenheim's World Heritage Site.
Policy KID H1: South-East of Woodstock	Objects to the policy unless it is reworded as per BOB-ICB proposed text. Considers that the proposed 450 dwellings would not be able to support a standalone new healthcare facility unless it was the relocation of an existing GP practise or a co-location of practices. Requires a turnkey healthcare facility to be built and transferred to the ICB, and would object if the facility is not financially and operationally viable	LPR-D-272 (BOB-ICB)	There has been no previous request from BOB ICB via Regulation 18 consultation, the DtC meetings held with the ICB during the preparation of the CLPR to date or the engagement with the ICB in the preparation of the Infrastructure Delivery Plan. Developer contributions are an important source of funding to provide new and improved infrastructure in response to housing and population growth. These must be fairly and reasonably related in scale and kind to the development proposal. We will continue to engage with BOB ICB so that adequate mitigation can be secured to serve this site either via the relocation of an existing practice or the co-location of practices and the necessary information included in the Infrastructure Delivery Plan.
Policy KID H1: South-East of Woodstock	Does not consider the policy to be legally compliant, sound or in compliance with the Duty to Cooperate	LPR-D-193	No information provided in the representation regarding Duty to Cooperate in regard to this Policy. Duty to Cooperate has been met as demonstrated in the Council's Duty to Cooperate Statement.
Policy KID H1: South-East of Woodstock	There are no exceptional circumstances to justify the allocation of the site given the availability of other sites in Cherwell which could accommodate a large number of houses without the same level of harm to designated heritage assets of outstanding international historic significance. The policy should be deleted	LPR-D-242	Disagree. The site allocation has been justified within the context of the CLPR strategy, the Kidlington Area Strategy, informed by up-to-date evidence and subject to Sustainability Appraisal.

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Policy KID H1: South-East of Woodstock	Objects to the site for reasons including a lack of infrastructure and services, flooding, a loss of character, over population, the impact on Blenheim Palace, its isolation from Woodstock and consideration that the site cannot overcome its previous reasons for rejection	LPR-D-290 (West Oxfordshire District Council) LPR-D-008 LPR-D-009 LPR-D-143 LPR-D-008 LPR-D-010 LPR-D-106 LPR-D-110 (Woodstock Town Council) LPR-D-112 (Bladon Parish Council) LPR-D-324 LPR-D-170 LPR-D-331 LPR-D-335 LPR-D-336 LPR-D-327 LPR-D-326 LPR-D-143 LPR-D-217 (Shipton on Cherwell & Thrupp Parish Council)	Disagree. The site allocation has been justified within the context of the CLPR strategy, the Kidlington Area Strategy and informed by up-to-date evidence supporting it. The site is located within walking distance to primary and secondary schools, cycling distance to a major employment area and on a bus route with frequent bus services to employment areas, the centre of Kidlington, Woodstock and Oxford. The Inspector's report for the adopted LPPR 2020 is set within the specific scope of the 2020 plan, Oxford's unmet needs. The Inspector 'fundamental concern' with the site being its separation from Oxford. The Council has had due regard to all representations received in relation to this site including matters referred to by the 2020 LP Inspector in his wider comments regarding this site as shown in the supporting text to Policy KID 1 in paragraph 6.11 of the CLPR. The site allocation was informed by up-to-date evidence on heritage impact and an addendum specific to the setting of the World Heritage Site including cumulative effects in discussion with Historic England. The setting of Woodstock was considered in the Site Landscape Assessment evidence, the study recommendations informed Policy KID H1. No concern raised from the County Council on archaeology and Historic England raised no objection to the site subject to word improvements to the policy. These are included in the list of proposed changes to the Plan. Local and strategic infrastructure needs have been addressed in consultation with the infrastructure providers and their involvement in the CLPR Infrastructure Delivery Plan.

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Policy KID H1: South-East of Woodstock	Suggests that the site should be considered from a Woodstock/West Oxfordshire District Council view as opposed to a Shipton/Cherwell District Council view. Clause 6 should specifically relate to primary healthcare provision in Woodstock. Notes there does not appear to be any Duty to Cooperate with West Oxfordshire District Council. Finds paragraph 6.104 to be incorrect as 40-50 units are still to be built.	LPR-D-133	Disagree. The site allocation has been justified within the context of the CLPR strategy, the Kidlington Area Strategy and informed by up-to-date evidence supporting it. Compliance with the Duty to Cooperate between West Oxfordshire and Cherwell is evidenced in the Duty to Cooperate Statement and acknowledged in West Oxfordshire's representation (LPR-D- 290). This site is in Cherwell District Council's area and appropriately justified within the CLPR strategy and objectives for the Kidlington Area Strategy. Minor corrections can be addressed following the CLPR examination.
Policy KID H1: South-East of Woodstock	Makes reference to February 2024 ICOMOS Technical Review to provide context for KID H1. Considers a proper analysis of the site has been undertaken. Notes that the health and education contributions should be on site	LPR-D-350	Council aware of ICOMOS Technical Review, further heritage impact evidence was commissioned in consultation with Historic England specific to Blenheim's World Heritage Site and published alongside the CLPR for consultation in December 2024. Requirements have been informed by and assessment of need, infrastructure providers' requests and their involvement in the CLPR Infrastructure Delivery Plan.
Policy HEY 1: Heyford Area Strategy	Supports the policy and the approach to development at Upper Heyford. Would welcome clarity on policy villages 5 and the flying field, and suggests a line should be added on preserving the areas heritage significance. A new inset map is needed to avoid confusion	LPR-D-274 (Historic England)	The various comments and proposed changes are noted. Proposed changes have been set out in the interests of improvement to the various sections of supporting text as requested by Historic England.
Policy HEY 1: Heyford Area Strategy	Notes that the former airbase houses a number of Scheduled Ancient Monuments relating to the Cold War Era. Supportive of the summary in the policy	LPR-D-302 (Oxfordshire County Council)	The comments are noted.

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Policy HEY 1: Heyford Area Strategy	Supports the policy in not allocating more development than already approved. Notes a lack of traffic mitigation from existing development. Welcomes the proposed commuter cycle route to Bicester and encourages a link to Middleton Stoney	LPR-D-201 (Middleton Stoney Parish Council)	The comments are noted. Disagree. Policy HEY1 clearly sets out the strategy for Heyford which seeks to secure the delivery of Policy Villages 5 which is retained from the 2015 adopted Local Plan which still needs to be delivered. No new policy is proposed Heyford Park.
Policy HEY 1: Heyford Area Strategy	Objects to the proposed strategy for Heyford Park as the evidence identifies it as a sustainable location but does not propose any additional growth. The previously proposed policy LPR42A: South of Heyford Park should be reincluded	LPR-D-258	The comments are noted. Disagree. Policy HEY1 clearly sets out the strategy for Heyford which seeks to secure the delivery of Policy Villages 5 which is retained from the 2015 adopted Local Plan which still needs to be delivered. No new policy is proposed Heyford Park.
Policy HEY 1: Heyford Area Strategy	The draft plan contains no vision or additional role for Heyford Park beyond existing commitments and the strategy no longer acknowledges to continuing development at Heyford Park to fully establish the new settlement. The local plan review should provide for the continuing development of the site. It is essential that a policy framework is in place to encourage the efficient use of brownfield land	LPR-D-210	The comments are noted. Disagree. Policy HEY1 clearly sets out the strategy for Heyford which seeks to secure the delivery of Policy Villages 5 which is retained from the 2015 adopted Local Plan which still needs to be delivered. No new policy is proposed for Heyford Park.
Policy HEY 1: Heyford Area Strategy	The plan fails the test of objectively assessed requirements due to the absence of feasibility studies recommended by the Structure Plan Panel when redevelopment was originally supported to conserve Cold War heritage. The plan appears to be concerned only	LPR-D-004	Disagree. There is an extensive Conservation Area covering the former airbase.

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	with implementing existing permissions, which should remain the position as until the settlement has a population of 25,000 it will be unsustainable in terms of transport. The national and international heritage significance of the site would only be realised with improvements to public transport. A holistic approach is needed to recognise the international significance applies to the site not to the buildings		
Policy HEY 1: Heyford Area Strategy	Concerned that inadequate measures are in place to prevent further development at Heyford Park. Notes further concern that given the constraints, it will not achieve the housing numbers suggested on the developable land without either an over-dense style of development or exerting too much pressure to develop outside of the proposed development area. Suggests rewording to include mention of the sites existing boundaries. Requests all future development should use permeable driveways and notes there is no mention of improving the B4030	LPR-D-113	Policy HEY1 clearly sets out the strategy for Heyford which seeks to secure the delivery of Policy Villages 5 which is retained from the 2015 adopted Local Plan which still needs to be delivered. No new policy is proposed for Heyford Park.
Policy HEY 1: Heyford Area Strategy	Concerned over the impacts of increased development on infrastructure, pollution, flooding and traffic. This should be considered before development begins to mitigate any impact	LPR-D-071	The comments are noted. The site allocations have been assessed and the details of this are included in the various evidence based documents that accompany the Regulation 19 Local Plan. At the planning application stage the proposals will be formally assessed including consultation of the relevant statutory consultees who are responsible for advising on the provision and mitigation that is required at the time.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy HEY 1: Heyford Area Strategy	Sport England expected there to be a sports hub identified in the Heyford Strategy Map. Any new facilities required should be identified on the policies map and include appropriate references within the policy to reflect the information in the Playing Pitch Strategy and Built Sports Facilities Strategy	LPR-D-191	Noted. No new policy is proposed for Heyford Park. Adopted Policy Villages 5 is saved.
Policy RUR 1: Rural Areas Housing Strategy	The strategy notes greater emphasis on development being supported by sustainable transport and active travel. Illustrative cases should be included in the plan showing how sustainable transport and active travel could be supported	LPR-D-302 (Oxfordshire County Council)	Noted. It is not considered necessary to include illustrative cases within the Plan as overly detailed information.
Policy RUR 1: Rural Areas Housing Strategy	Considers that developer contributions should be secured for offsite mitigations to accommodate additional GP services but not limited to improving, expanding or upgrading the existing GP practices in the local area. Contributions should be based on the Council's Developers Contributions SPD or any successor to this document	LPR-D-272 (BOB-ICB)	Noted.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR 1: Rural Areas Housing Strategy	Supports the policy	LPR-D-020 LPR-D-089 (Deddington Parish Council) LPR-D-176 LPR-D-185 (Sibford Ferris Parish Council) LPR-D-240 (Fritwell Parish Council) LPR-D-281 (Chesterton Parish Council)	Noted and welcomed.
Policy RUR 1: Rural Areas Housing Strategy	Generally supports the policy but should plan for higher housing in the rural areas	LPR-D-288	Noted. It is considered that the rural housing figure is appropriate and is in accordance with the spatial strategy.
Policy RUR 1: Rural Areas Housing Strategy	Generally in support but it should be more positive in supporting the growth of the larger settlements. The number for the rural areas should be increased to 1265 homes at least. Specific settlements e.g. Deddington should be identified as the preferred location for rural growth	LPR-D-283	Noted. It is considered that the rural housing figure is appropriate and is in accordance with the spatial strategy.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR 1: Rural Areas Housing Strategy	Welcomes the recognition to some planned development in the rural areas	LPR-D-315	Noted
Policy RUR 1: Rural Areas Housing Strategy	Supports the policy but not the reliance on Neighbourhood Plans	LPR-D-250	Noted. Neighbourhood planning is a recognised mechanism for delivering housing allocations.
Policy RUR 1: Rural Areas Housing Strategy	Objects due to the reliance on neighbourhood plans as there is no certainty on them coming forward. More rural sites need to be allocated in the Local Plan	LPR-D-138 LPR-D-211 LPR-D-236 LPR-D-262 LPR-D-263	Disagree. It is considered that the rural housing figure is appropriate and is in accordance with the spatial strategy.
Policy RUR 1: Rural Areas Housing Strategy	Handing responsibility to Neighbourhood Plans creates uncertainty	LPR-D-164	Neighbourhood planning is a recognised mechanism for delivering housing allocations.
Policy RUR 1: Rural Areas Housing Strategy	Objects to 'limited housing development' in rural villages, primarily Category A Villages	LPR-D-155 LPR-D-269	It is considered that the rural housing figure is appropriate and is in accordance with the spatial strategy.
Policy RUR 1: Rural Areas Housing Strategy	A higher quantum of homes should be directed to the Category A villages	LPR-D-214 LPR-D-297 LPr-D-322	Disagree. It is considered that the rural housing figure is appropriate and is in accordance with the spatial strategy.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR 1: Rural Areas Housing Strategy	The policy contains no provisions for housing growth in the rural areas beyond the settlements listed, not complying with Policy SP1 and therefore a greater proportion of housing growth should be allocated to the rural areas	LPR-D-254	Disagree. It is considered that the rural housing figure is appropriate and is in accordance with the spatial strategy.
Policy RUR 1: Rural Areas Housing Strategy	Objects as there needs to be a requirement to provide infrastructure and increased capacity prior to development. Additional surveys of natural assets should be carried out to inform development	LPR-D-096	These issues are addressed by other policies in the Plan.
Policy RUR 1: Rural Areas Housing Strategy	Objects to the number of houses proposed due to flooding, poor infrastructure and traffic	LPR-D-025	The number of homes proposed in the rural areas is restricted, with most development directed to the more sustainable locations. Any allocations are informed by evidence that includes flood risk, transport considerations and other infrastructure requirements.
Policy RUR 1: Rural Areas Housing Strategy	Objects to more development in the Caversfield/Bicester area	LPR-D-044	Bicester, together with Banbury is the most sustainable location within the district. Development at Caversfield is limited as set out in Policy SP1.
Policy RUR 1: Rural Areas Housing Strategy	Aside from allocated employment sites, Ambrosden should only accommodate infill development, conversions and minor development within the built up limits of the settlement	LPR-D-209	Agree.
Policy RUR 1: Rural Areas Housing Strategy	Objects to the 75 houses allocated for Bloxham due to traffic and lack of services. The housing mix should prioritise 2 and 3 bedroom properties in Bloxham	LPR-D-024	Bloxham is one of the largest rural settlements. It is considered that it is able to accommodate some modest additional housing.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR 1: Rural Areas Housing Strategy	Objects to more housing in Hook Norton due to flood risk, building on agricultural land, the erosion of the village community. Suggests more bungalows should be built for older people to downsize into	LPR-D-016	Noted. Hook Norton is classified as a Category A settlement, one of the most sustainable in the rural areas. It is considered that it is able to accommodate some modest additional housing.
Policy RUR 1: Rural Areas Housing Strategy	Suggests it should be ensured that the Category A villages do not go beyond the number indicated, that greenfield sites are protected and that developments meet village needs. Objects to the 75 houses for Hook Norton as it is not sustainable	LPR-D-041	Noted. Hook Norton is classified as a Category A settlement, one of the most sustainable in the rural areas. It is considered that it is able to accommodate some modest additional housing.
Policy RUR 1: Rural Areas Housing Strategy	Objects to the housing number for Ambrosden	LPR-D-300	No specific housing number is proposed for Ambrosden.
Policy RUR 1: Rural Areas Housing Strategy	Objects to the housing number for Adderbury	LPR-D-320	Noted. Adderbury is classified as a Category A settlement, one of the most sustainable in the rural areas. It is considered that it is able to accommodate some modest additional housing.
Policy RUR 1: Rural Areas Housing Strategy	Objects to the exclusion of Shutford and Tadmarton from within the policy	LPR-D-299	Neither Shutford nor Tadmarton are designated neighbourhood areas.
Policy RUR 1: Rural Areas Housing Strategy	Questions the 100 homes allocated to the Mid-Cherwell Neighbourhood Plan and suggests it should be changed to 71 as per the Neighbourhood Plan Consultation	LPR-D-126 LPR-D-271 (Kirtlington Parish Council)	Disagree. Mid Cherwell covers an area of 11 parishes, one of which is a Category A settlement. 100 homes is a modest requirement.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR 1: Rural Areas Housing Strategy	Questions the 100 home allocation to Mid-Cherwell as there is no explanation as to what Mid-Cherwell is and this should be defined	LPR-D-292 (Launton Parish Council)	Mid Cherwell is a designated neighbourhood area of 11 parishes.
Policy RUR 1: Rural Areas Housing Strategy	Small housing developments should be supported in Category C Villages	LPR-D-208	Policy SP 1 permits infill and minor development within the built up limits of Category C settlements.
Policy RUR 1: Rural Areas Housing Strategy	Supportive of revitalising urban centres, however it would be good to see proposals for leaving villages untouched rather than flooded with unwanted developments	LPR-D-005	The Plan has an urban focus with only very limited development proposed in the rural areas.
Policy RUR 1: Rural Areas Housing Strategy	It should be ensured that the Category A villages do not go beyond the numbers indicated and that greenfield sites are protected	LPR-D-041	Noted. Policy SP 1 will apply.
Policy RUR 1: Rural Areas Housing Strategy	The rural areas strategy does not conform to provisions of NPPF paragraph 83 regarding identifying opportunities for villages to grow and thrive and support local services	LPR-D-064	Disagree.
Policy RUR 1: Rural Areas Housing Strategy	Rural expansion should always benefit the local community	LPR-D-162	Noted.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR 1: Rural Areas Housing Strategy	The policy should reflect the need to mitigate transport impacts of housing development more clearly	LPR-D-201	Disagree. Other policies in the Plan address transport mitigation.
Policy RUR 1: Rural Areas Housing Strategy	The plan or evidence base has made no effort to understand localised housing needs in villages through conducting housing needs surveys or similar and therefore the growth distribution appears to be wholly arbitrary and have not followed a clear or objective process	LPR-D-255	The Plan is supported with appropriate evidence on housing needs. Some emerging neighbourhood plans are being informed by local assessments and these can be reflected in their policies.
Policy RUR 1: Rural Areas Housing Strategy	Notes the villages are delivering more housing that Kidlington which is not in proportion	LPR-D-282	Noted. The Plan's spatial strategy is to direct development to the most sustainable locations. It has an urban focus.
Policy RUR 1: Rural Areas Housing Strategy	Questions the village categorisation and the associated conservation area studies and protection. Objects as there needs to be a requirement to provide infrastructure and increased capacity prior to development	LPR-D-096	Policy SP 1 defines the settlement hierarchy. It is supported by evidence.
Policy RUR 1: Rural Areas Housing Strategy	Notes concern over the impact on Lower Heyford, Caulcott and Upper Heyford. Notes the Rousham Conservation Area is not mentioned. Villages categorised as 'rural areas' undermines their individual characteristics and local needs. Requiring 100 houses in mid-Cherwell would go	LPR-D-072	Disagree. It is considered that a requirement for 100 homes within the Mid Cherwell area is achievable. The neighbourhood area consists of 11 parishes including both Cate A and B villages.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
	against the stated aim of protecting character and identity of villages		
Policy RUR 1: Rural Areas Housing Strategy	Questions how windfall/speculative development can be protected in Fringford. Promotes use of brownfield land at Heyford Park over rural expansion	LPR-D-329 (Fringford Parish Council)	Policy SP 1 defines Fringford as a Category C settlement where development is limited to infilling and minor development within the built-up limits of the village.
Policy RUR 1: Rural Areas Housing Strategy	Seeks clarification on the impact to Islip and the implementation of the policy	LPR-D-161	Islip is not proposed for development as it is washed over by the Green Belt.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	There is little opportunity for infiltration SuDs	LPR-D-349 (Environment Agency)	Comments noted. Infiltration SuDs will not be practicable in every instance.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Wording should be amended to reflect that response to heritage assets should be sensitive. Suggests amendments to the text and that the developable area is pulled back in the east and northern extents of the site to ensure no adverse impacts	LPR-D-274 (Historic England)	Consider the policy requires development to respond to heritage assets. Reference is made to pulling back development in north and east.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	The site lies in an area of archaeological interest and potential. In support of criteria 19 but suggests improvements including requesting evaluation rather than excavation at this stage	LPR-D-302 (Oxfordshire County Council)	Consider the approach appropriate to include further investigation of archaeological potential.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Supports the policy	LPR-D-218 LPR-D-176 LPR-D-213	Noted and welcomed.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Supports the site as it is not in a conservation area or the Green Belt	LPR-D-177	Noted.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Objects to the policy unless it is amended. Notes that the proposed developments would add pressure to the existing GP services. Requests an additional bullet point to be added to include an off site financial contribution towards primary care	LPR-D-272 (BOB-ICB)	BOB ICB were consulted as part of the IDP to help understand what was required to support GP services. Where a response was received this was included in policy requirements.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Objects to the allocation for reasons including loss of sunlight, visual impacts, impact on wildlife, house values, traffic, water issues and safety issues	LPR-D-032 LPR-D-033 LPR-D-034 LPR-D-049 LPR-D-063 LPR-D-076 LPR-D-078 LPR-D-128 LPR-D-130 LPR-D-131 LPR-D-139 LPR-D-144 LPR-D-159 LPR-D-181 LPR-D-271 LPR-D-307 LPR-D-347	The allocation of the site has been assessed through the sustainability appraisal and also reviewed against the various components of the evidence base. The potential impacts have been considered proportionate for a plan allocation and weighed against the benefits of providing residential development in the rural areas. Matters such as sunlight would normally be taken into account through the site specifics of any scheme that came forward rather than at a plan making stage. House values are not a planning consideration. Water resources, and indeed the risk of flooding, has been taken into account in the allocation of this site. Road safety matters, and whether a safe access could be made were considered by Oxfordshire County Council, as Highways Authority, who have advised, based on the promoter's latest traffic work, that they have no objections to the allocation of this site.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Objects to the site and suggests allocation of the Station Road site as an alternative	LPR-D-033 LPR-D-048 LPR-D-053 LPR-D-066 LPR-D-073 LPR-D-074 LPR-D-075 LPR-D-128 LPR-D-130 LPR-D-131 LPR-D-139 LPR-D-144 LPR-D-154 LPR-D-159 LPR-D-163 LPR-D-205 LPR-D-188 LPR-D-189 LPR-D-307 LPR-D-314	Note objection. The Station Road site is located within the Green Belt and prior to considering the development of land within the Green Belt, national policy is clear that alternatives should be explored. If a site(s) cannot be found within non Green Belt land, then the LPA should review the Green Belt. However, it is not the case that non Green Belt alternatives cannot be found.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Objects to further development due to impact on the countryside and wildlife	LPR-D-147	Objection noted. The strategy of the Plan does distribute some development towards the rural areas, and for the most sustainable villages, the Council has sought to rely on Neighbourhood Plans to bring forward limited small scale development. In the case of Bletchingdon, there was a preference for the Council to make the allocation through the Local Plan.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Alternative sites and focus on development in larger villages should have been considered. States that the need would be met more appropriately through a Neighbourhood Plan. It fails to demonstrate that reasonable alternatives were considered and that assessments were based on proportionate evidence. The policy should be deleted	LPR-D-242	Objection noted. The strategy of the Plan does distribute some development towards the rural areas, and for the most sustainable villages, the Council has sought to rely on Neighbourhood Plans to bring forward limited small-scale development. In the case of Bletchingdon, there was a preference for the Council to make the allocation through the Local Plan. The Council uses the Strategic Housing Employment Land Availability Assessment from which to consider potential sites. In the case of Bletchingdon, part of the village lies within the Green Belt and alternative sites at Bletchingdon were not progressed on that basis. The allocation of this site is supported by evidence proportionate to plan making.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	There was a lack of engagement with the local community	LPR-D-163 LPR-D-205	The engagement with the parish council took place before and leading up to the Regulation 19 publication stage. The wider community were consulted during the publication stage and these representations will be provided to the examination. The consultation accords with the Council's published Statement of Community Involvement.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Suggests access is provided from Springwell Hill rather than Station Road	LPR-D-046	Access is proposed to be provided from Springwell Hill, where the landowner can make a safe access onto the highway on land within their control.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	The site is a safety hazard as it is close to a bend at the top of an incline without speed restrictions and a lack of pedestrian paths. Recommends introducing traffic calming, road straightening/widening and safer pedestrian access	LPR-D-345	Road safety matters, and whether a safe access could be made were considered by Oxfordshire County Council, as Highways Authority, who have advised, based on the promoter's latest traffic work, that they have no objections to the allocation of this site.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	The site allocation needs to be clarified in the supporting text as it states that the site covers two agricultural fields but it only covers the southern part of a single field closest to the settlement. Questions the allocation for 44 dwellings and suggests flexibility on this. Suggests wording changes to bullet 8 on tree and hedgerow planting. The views entered in the Conservation Area Appraisal are not publicly accessible and have altered since this was undertaken. Queries the requirement of a conservation plan and this should be clarified	LPR-D-213	The allocation of this site is shown on the policies map. The capacity of this site is indicative and is used to guide development. It is not intended to be inflexible. Conservation Area views should be publicly accessible and there is a footpath across the allocated site. A conservation plan is expected to inform the detail of a planning application on this site.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Objects as there is no natural field or other boundary along the northern edge of the proposed allocation. Notes concern regarding the visual openness. Requests the key design requirements 4, 6 and 10 are strengthened	LPR-D-271 (Kirtlington Parish Council)	Noted. Proposed residential capacity and policy requirements enable a sympathetic response to the site's context with built development located away from western and south-western parts of the site.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are required on/off site, the clarity on what loading/flow is anticipated from the development, water supply requirements on/off site. The council should work alongside Thames Water and they recommend that developers attach the information provided to them to their planning applications	LPR-D-079	Agreed that early dialogue would be beneficial and should take place between the applicants and Thames Water.
Policy RUR H1: Land west of Springwell Hill, Bletchingdon	Request for longer consultation period and increased engagement with residents	LPR-D-074 LPR-D-075	The consultation period was extended beyond the 6 weeks required by the Regulations.
Policy RUR 2: Rural Exception Sites	Supports the policy but recommends 100% affordable housing within the Cotswolds National Landscape with 75% permitted in exceptional circumstances	LPR-D-195	Noted. Epwell is the only village in the district that is within the Cotswolds National Landscape.
Policy RUR 2: Rural Exception Sites	Generally supports the policy but suggests amendments as criteria are too restrictive or unnecessary.	LPR-D-086	Support noted. Changes are not proposed as the wording is appropriate.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR 3: New Dwellings in the Countryside	Objects as it is a restrictive policy that runs counter to the positive policy framework established in the adopted plan. The criteria-based approach of Policy Villages 2 should be reinstated in replacement of Policy RUR 3 or in addition. The plan should allocate all sites required in neighbourhood areas	LPR-D-211	Disagree. Policy SP1 provides the approach to development in or adjacent to settlements. Neighbourhood plans are a recognised way to allocate housing sites.
Policy RUR 3: New Dwellings in the Countryside	The current wording is too restrictive and conflicts with other policies in the Local Plan. Suggests paragraph 2 is reworded to 'isolated dwellings which are not essential for rural workers' to align with the NPPF	LPR-D-234	Disagree. It is considered that the policy wording conforms with the NPPF.
Policy RUR 4: Conversion of a Rural Building to a Dwelling	Supports the policy	LPR-D-274 (Historic England)	Noted and welcomed.
Policy RUR 4: Conversion of a Rural Building to a Dwelling	Objects to the requirement to consider employment re-use of an existing building first as this is out of line with the NPPF. The policy is also out of line with the government's Permitted Development Rights that support the conversion of buildings to new dwellings. This requirement should be removed	LPR-D-234	Permitted development is beyond the scope of the policy. Where planning permission is required, the policy prioritises employment reuse over residential to promote the diversification of the rural economy.

LOCAL PLAN PROPOSED SUBMISSION: Banbury, Bicester, Kidlington Area, Heyford Park and Rural Area Strategies (CHAPTERS 4 TO 8)			
Part of Doc.	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policy RUR 5: Community-led housing development	Requests clarity on the benefits of community-led developments	LPR-D-096	The support for community led housing schemes is in conformity with the NPPF.
Policy RUR 5: Community-led housing development	Recommend including a policy on community-led housing	LPR-D-256	The Plan does include a policy on community housing.
Policy RUR 6: Replacement Dwellings in the Countryside	Supports the policy	LPR-D-274 (Historic England)	Support noted and welcomed.
Policy RUR 6: Replacement Dwellings in the Countryside	The requirement for replacement dwellings to be of a similar scale and within the same curtilage as that it is replacing is inflexible and will not allow the best environmental or other planning objectives to be achieved. This requirement should be removed, and this should be assessed on a case-by-case basis	LPR-D-234	Disagree. The protection of the character of the countryside is a primary objective, therefore substantially larger and more conspicuous dwellings should be resisted.

LOCAL PLAN PROPOSED SUBMISSION: Implementing the Plan (Chapter 9)			
Part of Doc.	**Comment/Issue**	**Rep. Number**	**Officer Response**
Policy IMP 1: Delivery and Contingency	Supports the policy but notes that the council should commit to going further to confirm that AMRs will be produced promptly following the close of a monitoring period and contingency plans should be set out with alternative sites identified	LPR-D-221	Disagree. The Plan includes a contingency. The Council produces an AMR on an annual basis.
Policy IMP 1: Delivery and Contingency	The policy is insufficient as it does not recognise that there will be an immediate shortfall in housing upon adoption.	LPR-D-136 LPR-D-287	Disagree. The Plan is required to demonstrate a five-year housing land supply from the point of adoption. This is calculated using the housing requirement set by the Plan.
Policy IMP 1: Delivery and Contingency	Recommends the inclusion of a commitment that the council will submit a new plan within 3 years of adoption	LPR-D-136 LPR-D-287 LPR-D-138	Disagree that this is needed. Plans are required to be reviewed within five years in any event.
Policy IMP 1: Delivery and Contingency	There is no measurable or deliverable action. There should be a mechanism and timescale to identify alternative deliverable sites if there is any future shortfall	LPR-D-258 LPR-D-300 LPR-D-320	Disagree. If the Council cannot demonstrate a five-year housing land supply in the future, the presumption in favour of sustainable development will be triggered. The Plan also includes a contingency.
Policy IMP 1: Delivery and Contingency	A more positive trigger mechanism should be added to make clear that further development on the edge of sustainable settlements will be brought forward if delivery is not being achieved. Suggests additions to the text	LPR-D-283	Disagree. If the Council cannot demonstrate a five-year housing land supply in the future, the presumption in favour of sustainable development will be triggered.
Policy IMP 1: Delivery and Contingency	There are too many saved policies without explanation and therefore they need to be deleted	LPR-D-233	Disagree. It is legitimate to save adopted policies if required.
Policy IMP 1: Delivery and Contingency	Should the plan proceed, a review policy with consequences is essential to address a substantial housing deficit	LPR-D-211	Disagree. The Council is required to review local plan policies at least once every five years.

LOCAL PLAN PROPOSED SUBMISSION: Implementing the Plan (Chapter 9)			
Part of Doc.	**Comment/Issue**	**Rep. Number**	**Officer Response**
Policy IMP 1: Delivery and Contingency	Suggests the inclusion of a robust monitoring framework to track the effectiveness of COM 13	LPR-D-344 (Hanwell Parish Council)	The Plan includes a monitoring framework for all policies.

LOCAL PLAN PROPOSED SUBMISSION: OTHER GENERIC COMMENTS TO THE PLAN			
Part of Doc.	**Comment/Issue**	**Rep. Number**	**Officer Response**
Supporting Text	Oxfordshire County Council have made suggestions for amended wording to paragraphs 3.9, 3.84, 3.79, 3.44, 3.401, 3.400, 3.399, 3.394, 3.391, 3.344, 3.341, 3.207, 3.140, 3.14, 3.137, 3.132, 3.13, 4.39, 5.39, 6.67 and 6.111	LPR-D-302 (Oxfordshire County Council)	Where appropriate changes are proposed.
Supporting Text	The Environment Agency made comments on paragraph 3.69	LPR-D-349 (Environment Agency)	Where appropriate changes are proposed.
Supporting Text	Sport England made comments on paragraph 4.28	LPR-D-191 (Sport England)	Noted.
Puy du Fou Proposal	Despite this not being addressed in the plan, a number of comments were received on this proposal	Multiple representations	This development is subject of a planning application which has yet to be determined. It is not necessary to include within the local plan.
Oxford United Football Club Proposal	Despite this not being addressed in the plan, a number of comments were received on this proposal	Multiple representations	The proposed stadium is the subject of a planning application which has yet to be determined. It is not a facility to meet Cherwell's needs. It is not necessary to include within the local plan.

LOCAL PLAN PROPOSED SUBMISSION: LOCAL PLAN APPENDICES			
Part of Doc.	**Comment/Issue**	**Rep. Number**	**Officer Response**
Local Plan Appendices	Appendix 1- Notes there is no policy relating to Banbury Inner Relief Road and Hennef Way. TR13 needs to be amended to be retained, or a new policy should be created to address this	LPR-D-257	Noted
Local Plan Appendices	Appendix 1- Requests clarification as to if existing policies that are identified to be retained are being offered for examination	LPR-D-300 LPR-D-320 LPR-D-258	This will be a matter for the inspector.
Local Plan Appendices	Appendix 1- Considers the wording needs to be amended. The plan refers to policies being 'retained' but in the glossary 'saved policies'. They must be referred to as 'saved'	LPR-D-092	Noted. This has been amended.
Local Plan Appendices	Appendix 1- There is inconsistency across TR14 and Policy BAN 3 which it has been replaced with	LPR-D-100	Noted. This has been amended
Local Plan Appendices	Appendix 1- Requests more detail and guidance in the Partial Review Policies to ensure any permitted development does not harm Oxford's wider historic green setting. Recommends an independent policy focused on the significance of longer distance views from Oxford to the surrounding green setting to ensure sensitive development	LPR-D-206	The Partial Review policies are to be saved. No further development immediately to the north of Oxford is proposed.
Local Plan Appendices	Appendix 2- Would like a similar table setting out the expectations for each site	LPR-D-138	An updated trajectory has been prepared for submission based on the latest monitoring data.

LOCAL PLAN PROPOSED SUBMISSION: LOCAL PLAN APPENDICES			
Local Plan Appendices	Supports the maps showing the gap areas where development will not be allowed	LPR-D-095	Noted and welcomed.
Local Plan Appendices	Appendix 2- Paragraph 3.201 is out of date as the district does not have a good pipeline of housing supply and cannot demonstrate a 5YHLS. Questions the lack of a separate trajectory for Oxford's unmet need to 2031 and questions the deliverability of the sites	LPR-D-210	An updated trajectory has been prepared for submission based on the latest monitoring data.
Local Plan Appendices	Objects to the housing supply and trajectory, considers that the plan does not put forward a positively prepared, sound strategy for necessary growth	LPR-D-299	An updated trajectory has been prepared for submission based on the latest monitoring data.
Local Plan Appendices	Appendix 4- The map is not clear and notes the strategic gap for Caulcott affects their property and should be amended so it is not included in it	LPR-D-264	Noted. Discussed this plotting error with the representor during the consultation period. Amendment is included in the list of proposed changes to the Plan.
Local Plan Appendices	Appendix 4 - Banbury – Nethercote, Overthorpe, Warkworth and Middleton Cheney Gap. Questions the urban boundaries for Banbury and the preservation and recognition of landscape features. Requests inclusion of ridge and furrow in the characteristics, and the A361 as the definition of Banbury's eastern edge which development should not extent past Should make clear that the strategic gap dos not seek to impose policies on adjoining authority.	LPR-D-100	Settlements gaps policies and evidence are distinct from landscape policies. It addresses the role of landscape in maintaining the separation of settlements. The settlement gaps identified are broad areas within which maintenance of settlement separation is a key consideration. The intention of the policy is to guide development proposals and support development decisions based on the key characteristics and guidance of each gap identified in Appendix 4. These are based on a robust assessment of each gap, the methodology and detail assessment is contained in the Green Gaps Study published for consultation alongside the Plan. Amendments removing land from West Northamptonshire are included in the proposed changes to the Plan.

LOCAL PLAN PROPOSED SUBMISSION: LOCAL PLAN APPENDICES			
Local Plan Appendices	Appendix 4- The Banbury-Nethercote-Overthorpe-Warkworth and Middleton Cheney gap, development should not extent east of the A361, north of the A422 to preserve the valley floor and the Overthorpe escarpment which are mutually dependent in landscape terms. Mapping should be clear that it does not seek to import policies on bordering counties. The Banbury- Williamscot and Chacombe gap is strong but to maintain distinction feels that new development should be avoided to preclude Banbury encroaching to the east of the Cherwell Valley, preclude any sense of Williamscot or Chacombe descending from their upper valley side settings and preclude views of development on the edge of Banbury east of the M40, on the approach from the north or from Chacombe	LPR-D-257	Settlements gaps policies and evidence are distinct from landscape policies. It addresses the role of landscape in maintaining the separation of settlements. The settlement gaps identified are broad areas within which maintenance of settlement separation is a key consideration. The intention of the policy is to guide development proposals and support development decisions based on the key characteristics and guidance of each gap identified in Appendix 4. These are based on a robust assessment of each gap, the methodology and detail assessment is contained in the Green Gaps Study published for consultation alongside the Plan. Amendments removing land from West Northamptonshire are included in the list of proposed changes to the Plan.
Local Plan Appendices	Appendix 7- Notes that the draft Nature Recovery Network Map is likely to be replaced by the Oxfordshire Local Nature Recovery Network	LPR-D-302 (Oxfordshire County Council)	Noted. Oxfordshire's Local Nature Recovery Strategy is under preparation. In March 2025, OXON and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Local Plan Appendices	Appendix 7- Objects to the inclusion of the draft Local Nature Recovery Strategy within appendix 7 as it is draft and not yet adopted. This should be removed from the appendix as it is too difficult to interpret and has not been adopted	LPR-D-191 (Sport England)	Noted. LNRS is addressed in the Plan. Oxfordshire's Local Nature Recovery Strategy is under preparation. In March 2025, OXON and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Local Plan Appendices	Appendix 8- Conservation Target Areas are likely to be replaced by the	LPR-D-302 (Oxfordshire County Council)	Noted.

LOCAL PLAN PROPOSED SUBMISSION: LOCAL PLAN APPENDICES			
	Oxfordshire Local Nature Recovery Network		Conservation Target Areas are an integral part of the emerging Local Nature Recovery Strategy. The LNRS is under preparation. In March 2025, OXON and Natural England agreed the approach for Local Plans which are at an advanced stage of preparation.
Local Plan Appendices	Appendix 9- Requests RAF Weston on the Green height development consultation zones and Birdstrike safeguarding zones are added. Notes MoD safeguarding requirements for RAF Bicester have been withdrawn	LPR-D-069	Noted and agreed. Changes are included in the list of proposed changes.
Local Plan Appendices	Appendix 10- Requests the full legal definitions of BOB-ICB and ICB to be included in the glossary.	LPR-D-272 (BOB-ICB)	Noted. Minor improvements such as explanation of frequently used acronyms can be addressed following the CLPR's examination.
Local Plan Appendices	Appendix 11- all bar one of the 25 policies included in Theme 1 are identified in appendix 11 as strategic. Questions if all of them are in the context of the NPPF	LPR-D-290 (West Oxfordshire District Council)	Noted. Changes are included in the list of proposed changes.

PROPOSED SUBMISSION: POLICIES MAP			
Document	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policies Map	The colour coding needs to be checked, particularly regarding Scheduled Monuments	LPR-D-274 (Historic England)	Noted. Mapping improvements are included in the list of proposed changes to the Plan.
Policies Map	The legend and colouring of the map is unclear and several sites which have already been developed are identified and committed housing sites. They should be removed	LPR-D-275 LPR-D-287	Noted. Mapping improvements are included in the list of proposed changes to the Plan.
Policies Map	The map is poor quality, low resolution and does not include the settlement gaps	LPR-D-271 (Kirtlington Parish Council)	Noted. Mapping improvements are included in the list of proposed changes to the Plan.

PROPOSED SUBMISSION: POLICIES MAP			
Document	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policies Map	The North West Bicester map's strategic gap is not justified. This policy should be deleted and the red line edge of the site should be clearly visible around the whole allocation	LPR-321	It is appropriate that where allocations contain large areas which are identified as remaining undeveloped and play an important role in preserving distinction between settlements, these are included in the strategic gap. Policy BIC H1 includes strategic gap criteria and thus the area of the proposed strategic gap within BIC H1 outline boundary is shown in the Policies Map. The application of Policy COM 13 is no different to other strategic gaps. Mapping improvements are included in the list of proposed changes to the Plan.
Policies Map	Land north of Pringle Drive and east of Oxford Road is designated as existing green space and it should be noted that there is extant planning permission for this land to be developed as a car and cycle parking hub	LPR-D-222	Noted. Mapping improvements are included in the list of proposed changes to the Plan.
Policies Map	Notes that the Chesterton site is shown as existing green space and is concerned that this is inaccurate and creates a misleading starting point	LPR-D-244	Noted. Mapping improvements are included in the list of proposed changes to the Plan.
Policies Map	Disagrees with the strategic gap placement and boundary line around Hawkwell (24/04275/OUT). Questions the overlap of the strategic gap and strategic housing allocation	LPR-D-080	Disagree. It is appropriate that where allocations contain large areas which are identified as remaining undeveloped and play an important role in preserving distinction between settlements, these are included in the strategic gap. Policy BIC H1 includes strategic gap criteria and thus the area of the proposed strategic gap within BIC H1 outline boundary is shown in the Policies Map. The application of Policy COM 13 is no different to other strategic gaps.
Policies Map	The Bicester Area and Policy BIC H1 maps are labelled incorrectly and conflict with appendix 4	LPR-D-260 (Bucknell Parish Council)	There is no conflict between Policy BIC H1 and Appendix 4. It is considered appropriate and justified that where allocations contain large areas which are likely to remain as green space and play an important role in preserving distinction between settlements, these are included in the defined strategic gap. This approach is proposed for the strategic gap between North-West Bicester and Bucknell. Given the scale of the development proposed, the area of the defined strategic gap is shown in the policy map for Policy BIC H1. The application of Policy COM 13 in this area is no different to other strategic gaps.

PROPOSED SUBMISSION: POLICIES MAP			
Document	**Comment / Issue**	**Rep. Number**	**Officer Response**
Policies Map	There are no footpaths or green connections shown explicitly on the map. Requests a map to show this	LPR-D-043	Noted. The Interactive Policies Map will be able to show that level of detail.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Affordable and Specialist Housing Need Assessment	The calculation of gross affordable need is reasonable but does not account for stock losses, and therefore estimates that only 46.7% of affordable housing need would be met. Considers estimates of specialist housing for older people to be an underestimate. Recommends the council should maximise on the standard method	LPR-D-211	The level of affordable housing is justified by the Council's evidence.
Affordable and Specialist Housing Need Assessment	Due to the significant need for affordable and specialist housing, a greater consideration should be given to a wider range of sites to help meet this need	LPR-D-221	It is considered that the sites proposed together with saved allocations and windfall allowances provides a good range of sites.
Air Quality Action Plan	Notes the plan only focuses on Nox and not PM2.5 and PM10 which are more dangerous. Notes no actions are agreed and there is no assessment of the impact of HGVs and LGVs from construction of allocated employment sites. States that in Bicester PM2.5 levels are higher than the WHO's safety threshold. Recommends there should be a genuine assessment of current traffic issues and	LPR-D-015	All evidence comments have been considered and evidence reviewed when appropriate.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
	congestion hotspots as well as forecasting the impact of current and planned developments. A Plan should be made the manage the impact. Investment should be concentrated in congestion hotspots and there should be greater investment in active travel		
Bicester Forecasting and Modelling Report	Paragraph 4.3.3- References the traffic conditions around North West Bicester area and considers the Local Plan to be unsound as it does not recognise the need to substantially improve the road infrastructure here. Notes there is no plan to improve the B4100 or J10 of the M40 in the Local Plan, only in the report which is considered to be inadequate. There should be recognition that money needs to be allocated to fundamentally improve road infrastructure in the area and considers all proposals should be halted until this is complete	LPR-D-003	Updated Bicester Forecasting Report has been updated.
Bicester Forecasting and Modelling Report	Queries the scenario testing set out in the report and that only two mitigation packages are included in the scenario tests, contrary to the NPPF and IDP. The report should align more closely with national policy and guidance, consider a greater range of mitigation measures, future scenarios and cumulative impacts	LPR-D-210	Updated Bicester Forecasting Report has been updated.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Banbury Transport Topic Paper	Notes that the plan does not include regular access to the town centre via bus for the areas adjacent to the A361 which is already at the afternoon peak	LPR-D-060	Noted
CDC Statement following publication of NPPF	Considers that the plan does not meet 80% of the local housing need and would therefore not benefit from transitional arrangements. Considers North West Bicester could deliver the 7500 homes almost entirely within the plan period	LPR-D-237	Noted. Disagree.
Cherwell Landscape Sensitivity Assessment	Objects to the assessment of Banbury and Hanwell as having low-moderate sensitivity	LPR-D-160	Noted. All comments have been considered and evidence reviewed when appropriate.
Cherwell Landscape Sensitivity Assessment	Notes that the assessment acknowledges the issue of separation between Banbury and Twyford but does not seek to prevent development in this location	LPR-D-227	Noted. All comments have been considered and evidence reviewed when appropriate.
Consultation Statement	Regulation 18 representations LPR-C-512 and LPR-C-386 are missing. All representations should be in the Regulation 18 Consultation Responses Database unless they are intended to be withheld for specific reasons	LPR-D-057	These missing representations were belatedly published on 23 January 2025.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Duty To Cooperate	Considers the Duty To Cooperate Statement to be accurate and will collaborate on a Statement of Common Ground if this is sought	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council)	Noted and welcomed.
Duty To Cooperate	Notes Buckinghamshire Council may need to discuss Duty To Cooperate matters to accommodate part of Buckinghamshire's housing need but they are not yet advanced enough in their assessments and evidence based studies	LPR-D-108 (Buckinghamshire Council)	Noted.
Duty To Cooperate	Considers CDC has satisfactorily discharged its Duty To Cooperate	LPR-D-290 (West Oxfordshire District Council)	Noted and welcomed.
Duty To Cooperate	National Highways continue to review the evidence and suggests the preparation of a statement of common ground	LPR-D-200 (National Highways)	Noted. Two further meetings with the two Highways Authorities on transport evidence have taken place since the closure of the Regulation 19 consultation. Cherwell and Oxfordshire County Council are preparing a SoCG with National Highways.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Duty To Cooperate	Notes concern that no Statements of Common Ground have yet been published	LPR-D-136 LPR-D-138 LPR-D-190 LPR-D-203 LPR-D-210 LPR-D-214 LPR-D-227 LPR-D-252 LPR-D-258 LPR-D-268 LPR-D-275 LPR-D-287 LPR-D-295 LPR-D-300 LPR-D-320	Where appropriate Statements of Common Ground are being prepared with relevant bodies.
Duty To Cooperate	There is no evidence that the matter of strategic gaps has been discussed with West Northamptonshire Council	LPR-D-253	West Northants Council have responded to the Regulation 19 consultation. They raise no objections. Other engagement is set out in the Statement of Compliance.
Duty To Cooperate	The evidence and the process behind the decision to remove support for the HENA which was jointly commissioned with Oxford City Council should be set out	LPR-D-138 LPR-D-190 LPR-D-252 LPR-D-258 LPR-D-287 LPR-D-300 LPR-D-320	The HENA was withdrawn following the criticism of the study by the Inspectors appointed to examine the Oxford City Local Plan in summer 2024.
Duty To Cooperate	Questions if this has been met due to a lack of meetings and Oxford City's failure to meet the Duty To Cooperate	LPR-D-165	Disagree. The evidence for this is set out in the updated Statement of Compliance.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Duty To Cooperate	There is a lack of evidence to demonstrate engagement with Oxford City to help resolve their additional unmet housing need	LPR-D-211 LPR-D-255 LPR-D-262 LPR-D-263 LPR-D-303 LPR-D-304 LPR-D-305 LPR-D-308 LPR-D-311	Disagree. The evidence for this is set out in the updated Statement of Compliance.
Duty To Cooperate	Considers the duty has not been met as only one meeting has been held regarding Oxford City's unmet need in the 7 years since the figure was agreed	LPR-D-315	Disagree, as demonstrated in the Statement of Compliance.
Duty To Cooperate	Considers evidence of ongoing cooperation needs to be demonstrated	LPR-D-223	Disagree. See Statement of Compliance

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Duty To Cooperate	Considers that evidence has not yet been published to fully demonstrate that the legal duty to cooperate with neighbouring authorities has been discharged	LPR-D-269	Disagree. See Statement of Compliance
Duty To Cooperate	Questions how Cherwell and Oxford City have cooperated to agree the housing need for their respective areas following publication of the December 2024 NPPF	LPR-D-204	Disagree. The evidence for this is set out in the updated Statement of Compliance.
Duty To Cooperate	Considers the statement provides evidence of extensive consultation and that cooperation between neighbouring authorities is critical for a strategic approach	LPR-D-206	Noted
Duty To Cooperate	The statement lacks any substance around resolutions, compromises and commitments between the neighbouring authorities that would lead to a positively prepared and effective Local Plan. The evidence from West Oxfordshire contradicts statements made within Cherwell's Duty To Cooperate Statements.	LPR-D-282	Disagree. The evidence for co-operation is set out in the Statement of Compliance. It is not a duty to agree.
Duty To Cooperate	There has only been minimal engagement with investors and developers as part of the Local Plan Review	LPR-D-341	Disagree. There have been four rounds of consultation as the Plan has been prepared. Engagement with site promoters/developers has occurred where necessary.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
ENA 2024	Finds this to be inadequate and questions the assumptions made on working styles and jobs growth as well as the sole focus on Bicester and Banbury	LPR-D-193	The most recently published ENA should be read alongside the 2021 ENA, and shows the change in working styles and people's preference for working at home - though this is not practicable for every sector. The distribution of employment is consistent with the spatial strategy which directs development to Banbury and Bicester as the two main towns as set out in the settlement hierarchy. Policy LEC 3 provides a flexible approach to employment development on unallocated sites. In Kidlington, there is existing committed employment development yet to be built out which was removed from the Green Belt.
ENA 2024	Considers that emerging data suggests employment land demand may rise further to 250-300ha for 2021-2042	LPR-D-211	Noted. The ENA presents a forecast-based scenario and a trend based scenario for Cherwell and considers this an appropriate range within which the Council can base its employment need.
ENA 2024	Objects that the amount of allocated employment land is at the lower end of the range recommended by the evidence	LPR-D-265	The ENA presents a forecast-based scenario and a trend based scenario for Cherwell and considers this an appropriate range within which the Council can base its employment need. The Council has allocated sufficient employment land and applies a flexible approach to non allocated land as set out in Policy LEC3
ENA 2024	The council should take a balanced approach to the amount of development needed and focus on the need arising from Cherwell itself, rather than the wider region	LPR-D-281	The ENA presents a forecast-based scenario and a trend based scenario for Cherwell and considers this an appropriate range within which the Council can base its employment need.
ENA 2024	There is no mention of the life sciences or tech sectors. States that an employment focus on Bicester and Banbury is not consistent with the spatial strategy or economic evidence and therefore it not sound	LPR-D-282	The most recently published ENA should be read alongside the 2021 ENA, which does refer to these sectors. The distribution of employment is consistent with the spatial strategy which directs development to Banbury and Bicester as the two main towns as set out in the settlement hierarchy. Policy LEC 3 provides a flexible approach to employment development on unallocated sites. In Kidlington, there is existing committed employment development yet to be built out which was removed from the Green Belt.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
ENA 2024	The scale of suppressed demand does not appear to be explicitly estimated. Demand estimates do not have a buffer of vacant sites. There is a need for further allocation	LPR-D-319	The ENA presents a forecast-based scenario and a trend based scenario for Cherwell and considers this an appropriate range within which the Council can base its employment need.
Green Gaps Study	There are contradictions in the study and in the Cherwell Landscape Character Assessment for some 'high quality landscapes'. Relevant evidence does not seem to be taken into account for this study	LPR-D-227	Disagree. The studies are not comparable. The Green Gaps Study considered the nature of the intervening landscape and the role of intervening settlements in reducing perceived separation between settlements. Landscape quality is only a consideration if
Green Gaps Study	The land within the site north of Dukes Meadow Drive as this is identified as benefitting from planning permission but is still covered by the Green Gap zone. Queries inclusion of land in the Hanwell Gap	LPR-D-248	Noted. Residential Development at Land north of Dukes Meadow Drive (21/03426/OUT) is acknowledged in the study (page 118) and shown in the map in page 116. Mapping error in the Banbury- Hanwell Appendix 4 map is included in the list of proposed changes to the Plan.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Habitats Regulation Assessment	Agrees with the majority of the conclusions in the HRA. Expects that sufficient evidence should be provided through the SA and HRA to justify the site allocation process and ensure sites of least environmental value are selected. Findings on the Begbroke HRA appear to contradict the conclusions of the Local Plan HRA. There are concerns with the approach to 'in combination' taken across Oxfordshire. Requests the full air quality assessment used to support the HRA findings to understand how the conclusions were reached	LPR-D-249 (Natural England)	Noted. Further information has been provided and engagement with Natural England is on-going with further meetings taking place since Regulation 19 publication in February and May 2025. We will continue to engage with Natural England as we progress the CLPR to examination.
Habitats Regulation Assessment	The HRA should include an assessment of present and planned Minerals and Waste and all Regulation 3 developments when considering combined impacts	LPR-D-302 (Oxfordshire County Council)	Disagree. Oxfordshire Minerals and Waste Local Plan Part 1 (Core Strategy) provides a policy framework for identifying sites for new minerals and waste development and for making decisions on planning applications. The supporting HRA Screening Report 2015 sets out why an Appropriate Assessment is not necessary at the strategic level of the Core Strategy. Work on a Part 2 Plan (Site Allocations Document) has ceased and will not be given weight in future planning decisions. OCC are commencing work on a new Minerals and Waste Plan (2042). HRA considers 'in combination' effects of minerals and waste operations through considering the county minerals and waste plan. Existing operational facilities are part of our background for assessment. Specific waste planning applications unless there is an application currently live in Cherwell that is not captured by minerals and waste planning.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Habitats Regulation Assessment	Welcome working together on the document and wishes to continue to assess collective impacts on the Oxford Meadows SAC	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council)	Noted and agreed.
Health Impact Assessment	There have been no further amendments to the HIA submitted for Regulation 18	LPR-D-302 (Oxfordshire County Council)	Incorrect. The HIA has been updated for the Regulation 19 Plan.
Housing and Economic Land Availability Assessment	Land at Bloxham Road Is incorrectly listed as 'potentially contaminated land' , 'all wooded habitats' and 'relatively isolated'	LPR-D-091	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	The assessment of HELAA321 as suitable for development is supported. However, the statement that there is no further potential for development is not justified	LPR-D-097	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Objects in relation to HELAA108, which should be considered suitable for some development	LPR-D-107	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Housing and Economic Land Availability Assessment	Disputes the assessment of HELAA094 as unsuitable for development on the basis of the acceptability of building on greenfield sites, the proximity to Bloxham's built up limits, the potential impact on the PROW, implications of the sites location and implications of site development on primary school expansion	LPR-D-164	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	HELAA 504 is scored green and is considered to have development potential but the summary states that the site is not considered suitable for development. Clarity is required. Consider site would make a useful contribution.	LPR-D-164	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Objects to the scoring of HELAA 523	LPR-D-208	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Disagrees with the assessment of HELAA 531	LPR-D-216	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Disagrees with the conclusions of HELAA 511 and notes any development in Banbury is likely to be on a greenfield site outside of the built-up limits	LPR-D-227	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Housing and Economic Land Availability Assessment	Disagrees with the HELAA findings for Land South of Milton Road and considers it to be in a sustainable location, with close proximity to several services and with limited relationship to the open countryside	LPR-D-242	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Objects that HELAA 086 is not suitable, achievable or available. Objects that HELAA 368 is not suitable, achievable or available and mentions the positive pre-app outcomes	LPR-D-265	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Comments concern about assumptions for HELAA 387 and states the Flood Zone 3 area and landscape views have no impact on the proposed development	LPR-D-275	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Objects to the conclusions of HELAA 470	LPR-D-287	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Objects to the conclusion of HELAA 212 as unsuitable	LPR-D-295	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Housing and Economic Land Availability Assessment	Objects to the conclusion that HELAA 400 and HELAA 401 are unsuitable	LPR-D-308	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Objects that the site is in the Green Belt and comments on differing assessments of HELAA 294 and HELAA 342	LPR-D-304	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Objects to the conclusion of Land of Hempton Road, Hempton in the HELAA	LPR-D-315	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Land east of Barford Road, Bloxham is identified in the HELAA under site reference HELAA504. However the summary for the site does not match the site assessment and therefore on this basis the HELAA is flawed.	LPR-D-269	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Questions the omission of the client's site in Cropredy from assessment in the HELAA	LPR-D-303	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Housing and Economic Land Availability Assessment	Questions why sites in Islip are not suitable	LPR-D-289	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Questions the omission of HELAA 394 and HELAA034 from the Local Plan	LPR-D-311	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
Housing and Economic Land Availability Assessment	Questions the omission of LPR-A-078 and 071 from the Local Plan	LPR-D-329	We have considered all comments received on the HELAA and made appropriate adjustments when justified. An updated HELAA will be available for examination.
HENA	Supportive of moving away from the HENA for housing purposes but comments that this does not mean the economic forecasting was inaccurate, or that there is not an 'in principle' reason to consider an uplift to support economic growth	LPR-D-262 LPR-D-263	Noted
Heritage Impact Assessment	Agrees with the assessment that the risk of archaeological remains of significance on the allocated RUR H1 site is low	LPR-D-213	Noted

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Heritage Impact Assessment	Does not find the HIA to be legally compliant, sound or compliant with the Duty To Cooperate	LPR-D-193	No justification has been provided by the representation. The Council commissioned expert consultants to carry out a HIA in consultation with Historic England who reviewed the methodology. It is considered that the HIA is a robust part of the evidence base.
Heritage Impact Assessment	Disagrees that there is a 'medium level of effect' on the significance of the World Heritage Site arising from development on the proposed allocation	LPR-D-267	The consultants have assessed this and concluded that there is a medium level of effect.
Infrastructure Delivery Plan	Notes a number of schemes would potentially impact the Strategic Road Network including additional capacity at M40 J9. Requests to be kept engaged on the progress on-slip improvements at the A34 Pear Tree and the expansion of Bicester Park and Ride. National Highways have no plans for improvement capacity at M40 J9 and if transport modelling identifies the need for this improvement, funding and timescales for delivery will need to be demonstrated	LPR-D-200 (National Highways)	Noted. The Council is currently engaging with National Highways on a number of issues.
Infrastructure Delivery Plan	As 4300 dwellings are due to be delivered beyond the plan period, BOB-ICB reinstates the need for an onsite primary healthcare facility at North West Bicester. Notes that some ICB elements are out of date and that some of the updated text for the IDP and IFA provided to the consultants is not in the document. Therefore, considers the plan to be unsound until this additional text is added.	LPR-D-272 (BOB-ICB)	The Council is continuing to engage with the ICB to assist with the delivery of improved primary care. An updated Infrastructure Delivery Plan will be presented for examination.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Infrastructure Delivery Plan	Chapter 4- The IDP and Infrastructure Schedule have limited information regarding healthcare requirements, especially in relation to site allocations. Recommends engaging with BOB-ICB to ensure on site health care demands are properly assessed and that health mitigations align with NHS requirements and the approach to securing health care provision	LPR-D-218 (NHS Property Services)	The Council is continuing to engage with the ICB to assist with the delivery of improved primary care. An updated Infrastructure Delivery Plan will be presented for examination.
Infrastructure Delivery Plan	Provides a number of comments and updates on the IDP and Infrastructure Schedule	LPR-D-302 (Oxfordshire County Council)	All evidence comments have been considered and evidence reviewed when appropriate. An updated Infrastructure Delivery Plan will be presented for examination.
Infrastructure Delivery Plan	Comments concern regarding new sites, the 17ha of employment at Graven Hill and the impact on the A41 corridor from Bicester to Aylesbury as this has limited capacity and needs improving. Notes the road condition is poor	LPR-D-108 (Buckinghamshire Council)	All evidence comments have been considered and evidence reviewed when appropriate. An updated Infrastructure Delivery Plan will be presented for examination.
Infrastructure Delivery Plan	Information needs to be changed in the Infrastructure Schedule regarding references, costs and other information	LPR-D-323	All evidence comments have been considered and evidence reviewed when appropriate.
Infrastructure Delivery Plan	The reference to the IDP should include a date and document reference for clarity	LPR-D-282	An updated Infrastructure Delivery Plan will be presented for examination.
Infrastructure Delivery Plan	Questions why the infrastructure schedule does not suggest that KID H1 will be expected to contribute to the A44 Mobility Hub	LPR-D-346	All evidence comments have been considered and evidence reviewed when appropriate.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Infrastructure Delivery Plan	Does not consider the link with OLTCP policies and ongoing projects in the IDP is enough to ensure that the Local Plan objectives are met	LPR-D-399	All evidence comments have been considered and evidence reviewed when appropriate. An updated Infrastructure Delivery Plan will be presented for examination.
Landscape Evidence	Considers the landscape evidence to be, in the main, a good report but questions the impact of the visual aspect of BIC E1, E2 and E3 as a result of the height of any employment development. The east and southeast should be protected.	LPR-D-281 (Chesterton Parish Council)	Noted. The Landscape evidence provides appropriate advice to inform plan making including important views and areas of landscape sensitivity. Defining developable areas is a Local Plan matter having considered all relevant evidence. Site allocation polices BIC E1 to BIC3 include a requirement for proposals to be accompanied and influenced by a landscape/visual and heritage impact assessment.
Site Landscape Assessments	The assessment fails to assess all potential sites including land west of Southam Road and notes that landscape sensitivity for this has since reduced	LPR-D-221	All evidence comments have been considered and evidence reviewed when appropriate.
Site Landscape Assessments	Notes incorrect statements within the assessment and therefore disagrees with the study in relation in Banbury L1	LPR-D-248	All evidence comments have been considered and evidence reviewed when appropriate.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Local Plan Viability Assessment	Comments on the omission of specification of an amount for healthcare mitigation. The S106 contribution of £14,000 per dwelling is sufficient but notes concern that there is no specific mention of healthcare mitigation in the viability assessment meaning it will compete with other planning obligations or be completely ignored resulting in unsustainable development. Requests a separate cost input specified for healthcare	LPR-D-218 (NHS Property Services)	All evidence comments have been considered and evidence reviewed when appropriate.
Local Plan Viability Assessment	It it unclear how costs were arrived at for net zero to achieve policy CSD2 and as to how much offsetting may be required as well as the likely costs of this. The LPVA may underestimate the cost of achieving net zero. There is no detailed evidence as to how the cost per dwelling for BNG was arrived at in relation to CSD 12, this needs to be demonstrated. The LPVA does not support 30% to 35% on brownfield land. Evidence for affordable housing needs to make clear costs for BNG and zero carbon homes as well as take into account the Building Safety Levy	LPR-D-165 LPR-D-138	All evidence comments have been considered and evidence reviewed when appropriate.
Local Plan Viability Assessment	Queries how costs have been calculated and what they include. It fails to consider the potential costs of CSD 5	LPR-D-165 LPR-D-321	All evidence comments have been considered and evidence reviewed when appropriate.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Local Plan Viability Assessment	Concern regarding viability in relation to the robustness of the assumptions made particularly relating to CSD 12, CSD2, and BIC H1	LPR-D-266	All evidence comments have been considered and evidence reviewed when appropriate.
Local Plan Viability Assessment	There is need for a viability assessment of the cumulative policy requirements of the draft Local Plan	LPR-D-276 LPR-D-341	Disagree. The CLPR viability assessment addresses the in-combination effect of polices.
Parish Profiles 2021	Considers Bloxham to be a sustainable settlement which should be a Category A with development directed to the village	LPR-D-164	Bloxham is categorised as a Category A settlement.
Settlement Hierarchy Topic Paper	Supports the identification of Banbury as a Main Town	LPR-D-221	Welcomed
Settlement Hierarchy Topic Paper	There are inaccuracies including inconsistent naming of the village and incorrect identification of key facilities meaning the village scores lower than the topic paper suggests. Objects to the statement that Great Bourton has good connectivity to Banbury. Great Bourton should not be classified as a Category B Village	LPR-D-103 (Bourtons Parish Council)	The evidence has been prepared at a point in time. Any inaccuracies have been corrected, however, this does not change the categorisation of Great Bourton as a Category B settlement.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Settlement Hierarchy Topic Paper	Notes errors in the paper including that Deddington should score 7, not 9, for pubs, Bloxham should score 1 for Warriner School and that comments on ultrafast broadband are incorrect. Considers the evidence to be flawed	LPR-D-164	The evidence has been prepared at a point in time. Any inaccuracies have been corrected.
Settlement Hierarchy Topic Paper	Seeks a review of the analysis to correct errors and, where necessary, reclassify settlements. Fully supports the comments on the paper by Bourtons Parish Council	LPR-D-257	The evidence has been prepared at a point in time. Any inaccuracies have been corrected, however, this does not change the categorisation of Great Bourton as a Category B settlement.
Settlement Hierarchy Topic Paper	Requests corrections regarding the scoring	LPR-D-269 LPR-D-295	The evidence has been prepared at a point in time. Any inaccuracies have been corrected.
Settlement Hierarchy Topic Paper	Questions why the Updated Topic Paper (February 2025) was not consulted on	LPR-D-308	The updated topic paper was published as a table in the appendix of the original paper was not reproduced correctly. This only related to an appendix which did not change the overall recommendations of the Paper.
Playing Pitch & Outdoor Sport Strategy	Mentions the strategy is based on no contact with Kidlington Cricket Club over the last 2.5 years. The Regulation 19 plan has omitted to set a strategy for Stratfield Brake	LPR-D-282	The cricket club was consulted in the preparation of the PPOSS. Stage E meetings are held with representatives of the Sports governing bodies, including the England and Wales Cricket Board. The PPOSS makes detailed recommendations for Stratfield Brake.
Playing Pitch and Built Facilities Strategy	Would like to see more of the recommendations from the strategy specifically referenced in the Local Plan	LPR-D-191 (Sport England)	Noted. It is considered that the level of detail is appropriate.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Sustainability Appraisal	Expects sufficient evidence to be provided through the SA and HRA to justify the site allocation process and ensure sites of least environmental value are selected	LPR-D-249 (Natural England)	Noted. SA outline reasons for selecting the preferred approach in light of alternatives assessment and of how environmental objectives and considerations are reflected in the draft plan. SA includes and considers the findings of HRA undertaken at Regulation 18 and Regulation 19 stage.
Sustainability Appraisal	Considers paragraphs 6.5.6 and 9.4.1 to be inaccurate as the Environment Agency did object to all site allocations at Regulation 18 stage. Regarding table 2, flood risk vulnerability and flood zone incompatibility in the guidance shows some development should not be permitted in certain flood zones. If any of the site allocations propose development in the floodplain that are incompatible with the flood plain, the Environment Agency would object to them also	LPR-D-349 (Environment Agency)	Comments noted. In the Council's understanding, the principle of the allocations was not objected to, rather it was suggested that the supporting evidence was not considered robust by the representor and further evidence was required. In any event, further work has been prepared following these comments in respect of flood risk.
Sustainability Appraisal	Welcomes that scenario 1 has been progressed due to reduced impact on biodiversity. Notes on scenario 3 that there is no potential to deliver built form within the Shipton Quarry LWS. On Bicester H1 the area of ancient woodland at Grunthill Copse should be acknowledged. There should be consideration and application of the mitigation hierarchy regarding Ardley Cutting and Quarry SSSI with Policies BIC H1, E1, E2, E3 E4 and E6	LPR-D-302 (Oxfordshire County Council)	The points raised regarding biodiversity sensitivity at two of the sites that feature as variables across the reasonable alternative growth scenarios are noted.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Sustainability Appraisal	Notes that SA1 accompanying the Local Plan includes some unsupported assumptions about future Oxford unmet housing need (Paragraph 5.2.25) but the plan takes no action related to these assumptions	LPR-D-198 (South Oxfordshire District Council) LPR-D-199 (Vale of White Horse District Council)	The representation questions paragraph 5.2.25 of the SA Report, which states: "As discussed in the footnote below, there is a strong argument to suggest that there is no evidential reason to plan for further unmet housing need from Oxford City over-and-above the 4,400 homes already committed to. However, as discussed, this is on the basis of assumptions regarding Oxford City's need and supply figures. With regards to supply, there is little basis for questioning the 493 dpa figure discussed in the footnote, but there is a need to sensitivity test for a need figure above standard method (1,051 dpa)." This discussion and the associated discussion in respect of uncertainties and ultimately risks around the question of unmet need from Oxford City was carefully considered and appropriate. Uncertainty/risk in respect of unmet need from Oxford City was one factor amongst many that fed into a decision to define (Section 5.5) and appraise (Section 6) higher growth scenarios.
Sustainability Appraisal	Supports the approach to the Sustainability Appraisal but raises concern regarding their site. The SA should be updated to show Wendlebury is the most appropriate location for growth	LPR-D-287	The representation deals with one of the site options that is a variable across the reasonable alternative (RA) growth scenarios that area a focus of appraisal in the SA Report (Section 6). The suggestion is that the appraisal underplays the performance of the site in respect of flood risk, but we are clear that this is a significant constraint to growth in the area. There is also a suggestion that the appraisal underplays the 'communities' performance of the site, but this is without any reference to the appraisal findings. Finally, we would wish to make clear that information submitted by the site promoter at the Regulation 18 stage was taken into account.
Sustainability Appraisal	Generally agree with the assessment but makes comments regarding landscape and heritage assessment	LPR-D-267	We are pleased that the consultee has been able to draw upon the SA Report as a source of evidence, and a means of framing discussion of some key issues. It is noted that the proposal is to deliver the scheme in the form of a new hamlet to the east of Woodstock. The suggestion that the primary school issue has now been resolved is also noted.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Sustainability Appraisal	Welcomes the reference to comprehensive planning of the entire northern sector of the Banbury urban edge but considers this should be considered as part of the Local Plan Review rather than as a longer-term consideration	LPR-D-221	The concern is that a specific site at Banbury should have been taken forward to the reasonable alternative growth scenarios (Section 5.5) rather than being dismissed on the basis of the analysis presented in Section 5.4 (Sub-area scenarios) which, it is important to recall, was prepared drawing upon preceding analysis in Sections 5.2 and 5.3. The analysis is considered robust, although the point raised in the representation regarding landscape sensitivity now being potentially reduced on account of an adjacent site now being under construction (or having been constructed) is noted. Even were landscape sensitivity now reduced it is considered that there would still be sufficient justification for not progressing the site to the reasonable alternative growth scenarios (Section 5.5) for appraisal (Section 6).
Sustainability Appraisal	There is no evidence of systematic assessment against SA objectives for each of the sites. A comparative assessment of all options for allocations should have been undertaken through the SA process	LPR-D-057	The SA Report is required to present an appraisal of "the plan and reasonable alternatives" as explained on page 1 of the report. The concern here is in respect of the appraisal of reasonable alternatives (RAs), which is dealt with in Part 1 of the SA Report, specifically: Section 4 defines RAs in broad terms; Section 5 reports a major process define RAs; Section 6 appraises RAs; and Section 7 presents the Council's response to the appraisal. This was the same for the previous ISA Report (2023). Site options are not RAs (see Section 4) but were nonetheless given proportionate consideration as part of the process of defining RAs. In particular, Section 5.4 (Sub areas) presents detailed (but targeted/proportionate) analysis of site options, both in isolation and in combination, drawing upon preceding Sections 5.2 (Strategic factors) and Section 5.2 (Site options). A specific concern is that proposed allocation BAN H2 has been "engineered" without sufficient analysis, but it was discussed in Section 5.4 of the SA Report before a decision was reached to hold it constant across the RAs ('growth scenarios') as defined in Section 5.5. Equally, this was the case at the time of preparing the ISA Report (2023). In both reports the site is then appraised in Part 2 (Section 9) which presents an appraisal of the plan as a whole.
Sustainability Appraisal	There is no clear basis for favouring the lower growth scenario over the highest	LPR-D-288	Detailed comments are presented on the appraisal of reasonable alternatives (RA) growth scenarios, as presented in Section 6 of the SA Report. The comments are welcomed, but having reviewed the comments we do not find that they identify any flaws in the appraisal.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Sustainability Appraisal	Suggests a higher growth scenario should be considered to support economic growth	LPR-D-137 LPR-D-165	This is a lengthy representation, but the following summary is helpfully provided: "We have identified two major concerns with the SA which are: 1. There has been a marked reduction in the quantum of new allocations in the Regulation 19 draft Plan in and around Bicester compared to the Regulation 18 Local Plan. Vistry consider these changes to be contrary to the Vision and draft Local Plan Objectives and the preferred spatial strategy proposed within both the Regulation 18 and 19 SA. As a result of the reduction in the quantum of homes in and around Bicester, the Regulation 19 SA should have allocated more sites in Bicester in order to maintain compliance with the Vision and Objectives; and 2. The reasons for rejection of the Vistry's site at Blackthorn Hill (LPR 21) are not based on any sound technical evidence which has been presented by the Council. The allocation of the client's site would be in strong alignment with the preferred spatial strategy." On point (1), this misunderstands the role of SA, it is not to direct additional development to a location, it is to assess the proposals of the Plan. On point (2), the site in question was taken forward to the reasonable alternative (RA) growth scenarios on the basis of the process set out across Section 5 of the SA Report, and ultimately features in RA growth scenarios 4, 5 and 6. It is then considered in detail through the appraisal of RA growth scenarios in Section 6, with around 17 appraisal discussions across the section. In light of the appraisal the Council then decided to support RA growth scenario 1, which does not involve allocation of the site in question.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Sustainability Appraisal	Objects due to the reduction in new allocations around Bicester and questions reasons for rejection of the site at Blackthorn Hill	LPR-D-165	This is a lengthy representation, but the following summary is helpfully provided: "We have identified two major concerns with the SA which are: 1. There has been a marked reduction in the quantum of new allocations in the Regulation 19 draft Plan in and around Bicester compared to the Regulation 18 Local Plan. Vistry consider these changes to be contrary to the Vision and draft Local Plan Objectives and the preferred spatial strategy proposed within both the Regulation 18 and 19 SA. As a result of the reduction in the quantum of homes in and around Bicester, the Regulation 19 SA should have allocated more sites in Bicester in order to maintain compliance with the Vision and Objectives; and 2. The reasons for rejection of the Vistry's site at Blackthorn Hill (LPR 21) are not based on any sound technical evidence which has been presented by the Council. The allocation of the client's site would be in strong alignment with the preferred spatial strategy." On point (1), this misunderstands the role of SA, it is not to direct additional development to a location, it is to assess the proposals of the Plan. On point (2), the site in question was taken forward to the reasonable alternative (RA) growth scenarios on the basis of the process set out across Section 5 of the SA Report, and ultimately features in RA growth scenarios 4, 5 and 6. It is then considered in detail through the appraisal of RA growth scenarios in Section 6, with around 17 appraisal discussions across the section. In light of the appraisal the Council then decided to support RA growth scenario 1, which does not involve allocation of the site in question. Text from Section 5 is selectively quoted as part of an argument for higher growth. Section 5 reports a major process undertaken over a period of years to define the RA growth scenarios that are ultimately presented in Section 5.5 and appraised in Section 6. The process is introduced in Section 5.1, including with a flow diagram, and a whole comprises 50% of the SA Report. It should be read as a whole and all statements made should be read in context. Section 5.4 (Sub-area scenarios) is a key section that draws matters together, but even Section 5.4 must be read in the context of preceding Sections 5.2 (Strategic factors, with Appendix III) and Section 5.3 (Site options, with Appendix IV).

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Sustainability Appraisal	Considers that the council does not meet the transitional arrangements. The SA emphasises effective cooperation between neighbouring authorities but incorrectly assumes a small risk associated with accommodating Oxford City's unmet need. Questions inconsistencies and failure to consider more sites at Heyford Park	LPR-D-210	The representation refers to Section 6 of the SA Report, which presents the appraisal of reasonable alternatives growth scenarios, finding that Growth Scenario 1 – which is then taken forward as the preferred approach in Section 7 – is not "the most sustainable". It is important to be clear that this may be the interpretation of the objector, but it is not the conclusion reached in Section 6. Indeed, Section 6 does not reach a conclusion on which of the growth scenarios appraised is the most sustainable. Similarly, the representation states that the SA Report "provides clear support" for higher growth, but this risks being highly misleading. The appraisal in Section 6 highlights that there are certain arguments in favour of higher growth, but also arguments against higher growth. It is then stated that Heyford Park is an "obvious reasonable alternative", but this is not the case. The detailed analysis presented across Section 5 leads to a conclusion that there is no reasonable growth scenario involving allocation of Heyford Park. The representation concludes: "The SA has failed to consider the continuation of the role of Heyford Park in the plan period. It is illogical for the Council to state there is the possibility for substantial growth at Heyford Park but to then suggest its simply too much for them to consider." On the first point, this is not correct as detailed consideration is given to Heyford Park across Section 5 (Defining growth scenarios). On the section point, it is not illogical to give weight to the merits of comprehensive growth and then to conclude that the scale of growth needed (to deliver comprehensive growth) is not supported given various factors e.g. housing need.
Sustainability Appraisal	There is little explanation why 'additional' unmet need cannot be identified at present and thereby distributed.	LPR-D-211	The concern is with Section 7 of the SA Report, as follows: "There is little explanation as to why any 'additional' unmet need in addition to that agreed in 2016 cannot be identified at present and thereby distributed. There is also limited explanation as to why the arguments for adopting a higher housing requirement figure are not supported. It highlights the flaws in the approach pursued by the Council." Section 7 of the SA Report presents the Council's response to the appraisal in Section 6. It does not aim to repeat all of the substantive discussion from Section 6, but rather aims to present a concise statement on why the preferred approach – Growth Scenario 1 – is justified on balance.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Sustainability Appraisal	Paragraph 2.2.6 refers to risk associated with Oxford City's unmet need and the likelihood of this continuing beyond 2031. Notes on paragraph 2.2.8 that the housing requirement should be an aggregate figure combining the allocations to meet Oxford's unmet need and Cherwell's need. Disagrees that growth should be focused at Bicester over Banbury and disagrees with the conclusion that HELAA038 is unsuitable for development	LPR-D-221	Comments noted. The representation refers to Section 6 of the SA Report, which presents the appraisal of reasonable alternatives growth scenarios, finding that Growth Scenario 1 – which is then taken forward as the preferred approach in Section 7 – is not "the most sustainable". It is important to be clear that this may be the interpretation of the objector, but it is not the conclusion reached in Section 6. Indeed, Section 6 does not reach a conclusion on which of the growth scenarios appraised is the most sustainable. Similarly, the representation states that the SA Report "provides clear support" for higher growth, but this risks being highly misleading. The appraisal in Section 6 highlights that there are certain arguments in favour of higher growth, but also arguments against higher growth. Section 7 of the SA Report presents the Council's response to the appraisal in Section 6. It does not aim to repeat all of the substantive discussion from Section 6, but rather aims to present a concise statement on why the preferred approach – Growth Scenario 1 – is justified on balance. Banbury has seen higher levels of delivery, but it remains constrained as a town in terms of growth at the town's edge for reasons of topography and landscape. Bicester remains the focus of on-going growth and reflects its role as a sustainable Garden Town and position on the Oxford Cambridge Corridor..
Sustainability Appraisal	The updated SA was presented to O&S committee without revised housing needs assessment, an up-to-date employment needs assessment of infrastructure delivery plan. There should be a review of the SA in relation to the comments made regarding Oxford's needs, Kidlington and the need for a Green Belt Review	LPR-D-282	The suggestion is that the SA Report "site-steps" the matter of further unmet need from Oxford City, but in fact it makes every effort to address the issue head on. The risk of further unmet need from Oxford City was a key factor influencing a decision to define (Section 5) and appraise (Section 6) higher growth scenarios. The suggestion is that a "policy on" approach was taken in respect of Green Belt. It is correct to say that Green Belt fed in when defining reasonable alternative (RA) growth scenarios (Section 5), but ultimately two Green Belt sites are taken forward to the RA growth scenarios defined in Section 5.5. It is also noted that, within the concluding statement, the suggestion is that the SA Report "ruled out a Green Belt Review", but this misunderstands the role of the SA process, which is simply to draw upon best available evidence.

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
Sustainability Appraisal	Regarding paragraphs 5.4.104-5.4.113, does not consider the SA to be legally compliant. Islip should be assessed as a Category A village	LPR-D-289	The concern is with the decision to progress the option of strategic growth at Shipton Quarry to the reasonable alternative growth scenarios (Section 5.5 of the SA Report) for appraisal (Section 6) ahead of the option of strategic growth at Islip. This matter is discussed from paragraph 5.4.108 of the SA Report (read in the context of preceding discussion across Section 5) and the reasoning presented is considered to be sufficient ("outline reasons for selecting the alternatives").
Sustainability Appraisal	Questions Shipton Quarry Eco Village and notes the need for development to remain proportionate	LPR_D_87❸ (Shipton.on. Cherwell.™. Thrupp.Parish. Council)	Noted. The assessment of reasonable options in the Sustainability Appraisal has supported the Plan in meeting identified housing, employment and other development needs within a positively prepared and justified Plan strategy.
Traffic Modelling	There is under-estimation in the Bicester Traffic Model and there Is no reliable evidence of 500 additional homes in Hawkwell Village	LPR-D-339	Bicester Transport Modelling Forecasting Report is being updated.
Transport Modelling	Notes the engagement carried out with National Highways on traffic modelling evidence supporting the plan. Provides a list of queries and observations on the modelling evidence and notes engagement will continue to resolve their outstanding queries. Proposes the preparation of a Statement of Common Ground	LPR-D-200 (National Highways)	Noted. We will continue to engage with National Highways to address and resolve relevant matters as we progress the CLPR to adoption and implementation of transport improvements alongside OCC.
Transport Evidence	There is a need for a proper transport assessment of the proposed draft Local Plan	LPR-D-276 LPR-D-341 LPR-D-233	Disagree. The CLPR has been informed by transport evidence consistent with national guidance on 'Transport evidence bases in plan making and decision taking'. Matters addressed include assessment of existing conditions, cumulative impact of existing and proposed

EVIDENCE DOCUMENTS			
Document	**Comment / Issue**	Rep. Number	**Officer Response**
	The evidence based documents are incomplete		development, capacity of transport infrastructure and identification of transport proposals. Table 1 of the Transport Existing Conditions Topic Paper published in December 2024 provides an overview of transport evidence prepared to inform the December 2024 CLPR consultation and the matters covered in compliance with national guidance. In addition, the Council also published for consultation place specific transport topic papers focused on Banbury, Bicester and Kidlington.

LOCAL PLAN PROPOSED SUBMISSION: REPRESENTATIONS PROMOTING SITES NOT IN THE PLAN			
	Site	Re. Number	**Officer Response**
Omission Sites	Land off Bicester Road, Bicester for 24.5ha employment land	LPR-D-039	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Overthorpe Road, Banbury for 1,500,000sq ft of employment/transport hub space	LPR-D-091	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of A41, Bicester for 56,000 sqm industrial floorspace	LPR-D-152	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of the B4030, adjacent to North West Bicester (HELAA531) for a high-tech business park and associated research campus	LPR-D-216	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at J11, M40 for 140,000 sqm of logistics floorspace	LPR-D-253	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.

LOCAL PLAN PROPOSED SUBMISSION: REPRESENTATIONS PROMOTING SITES NOT IN THE PLAN			
Omission Sites	Land East of Baynards Green Farm, Baynards Green (Tritax Park, Ardley) for B8 employment development	LPR-D-319	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of Langford Lane for employment development	LPR-D-310	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at London Oxford Aiport for employment development	LPR-D-293	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Bicester Motion for employment development	LPR-D-265	
Omission Sites	Land at the Former Lagoon, Banbury Sewage Treatment Works, Thorpe Mead, Banbury employment/residential development	LPR-D-079 (Thames Water)	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Grimsbury Reservoir, Grimsbury, Banbury for employment development	LPR-D-079 (Thames Water)	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Thames Water Kidlington Depot for employment development	LPR-D-079 (Thames Water)	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Shipton Quarry site for 2500 dwellings/ 25 acres of employment land	LPR-D-276	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Pear Tree Services for employment development	LPR-D-142	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

LOCAL PLAN PROPOSED SUBMISSION: REPRESENTATIONS PROMOTING SITES NOT IN THE PLAN			
			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land west of the A44/A34 junction for renewable energy and employment uses	LPR-D-142	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off of the A41, South East Bicester for 70 dwellings or commercial led development	LPR-D-230	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Bicester Road, Kidlington for housing development	LPR-D-142	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Painters Farm Bloxham for residential development	LPR-D-164	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of Old Quarry House, Steeple Aston for 12-15 dwellings	LPR-D-295	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of Hempton Road, Hempton for 9 dwellings	LPR-D-315	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land to the west of Southam Road, Banbury (The Rise) for 150 dwellings	LPR-D-275	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land east of Barford Road, Bloxham for 115 dwellings	LPR-D-269	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of Cassington Road, Yarnton for 400 dwellings	LPR-D-268	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of Old Quarry House, Steeple Aston for 12-15 dwellings	LPR-D-295	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Ells Lane, Bloxham for housing development	LPR-D-297	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Ploughley Road, Ambrosden for housing development	LPR-D-300	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of Station Road, Cropredy for 71 dwellings	LPR-D-303	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at 14-16 Woodstock Road, Yarnton for 60 dwellings	LPR-D-304	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Station Road, Bletchingdon for 50-150 dwellings	LPR-D-314	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Crouch Farm, Bloxham Road, Banbury for 260 dwellings	LPR-D-091	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land North of Merton Road, Ambrosden for 95 dwellings	LPR-D-263	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land to the north of Cropredy and south of Cropredy for 65 dwellings	LPR-D-262	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land west of The Old Piggeries, Bloxham Road, Milcombe for 50 dwellings	LPR-D-254	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of Milton Road, Bloxham for 200 dwellings	LPR-D-242	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Arncott for 300 dwellings	LPR-D-231	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Blackthorn (2 parcels) for 100 and 40 dwellings respectively	LPR-D-232	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land east of South Newington Road, Bloxham for 130 dwellings	LPR-D-236	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land to the west of Fringford, off The Green, Fringford for 9 dwellings	LPR-D-153	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Blackthorn Hill, Bicester for 800 dwellings	LPR-D-165	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Banbury Road, Adderbury for 75 dwellings	LPR-D-151	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of Banbury Road, Finmere for 50 dwellings	LPR-D-137	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of Springfield Road, Caversfield, Land north of Rau Court, Caversfield and Land off of Woodcote Road for 100 dwellings	LPR-D-107	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of A4095, Bicester for 100 dwellings	LPR-D-224	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land west of Banbury, north of Broughton Road for 58 dwellings	LPR-D-136	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Bicester Hotel, Chesterton for 450 dwellings	LPR-D-105	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Crouch Farm, Bloxham Road, Banbury for 260 dwellings	LPR-D-091	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of Broughton Road, Banbury for up to 58 dwellings	LPR-D-136	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of Broughton Road and west of Friswell Road, Banbury for 50-75 dwellings	LPR-D-054	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land to the north of Banbury (West of Warwick Road) for 200 dwellings	LPR-D-190	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of Epwell Road, Shutford for 35 dwellings	LPR-D-208	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land within and south of Heyford Park for 6000 dwellings	LPR-D-210	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Station Road, Hook Norton for 55 dwellings	LPR-D-211	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Tadmarton Road, Bloxham for 60 dwellings	LPR-D-211	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of the The Bourne, Hook Norton for 71 dwellings	LPR-D-214	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land adjacent to Bankside Phase 2, Banbury for 260 dwellings	LPR-D-227	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north and south of Milton Road, Bloxham for 230 dwellings	LPR-D-288	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Milestone Farm, Broughton Road, Banbury for residential development	LPR-D-215	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Painters Farm, Bloxham for residential development	LPR-D-164	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of Wimborn Close, Deddington (HELAA116) for residential development	LPR-D-155	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at The Moors, Kidlington for 300 dwellings	LPR-D-282	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Banbury Road, Deddington for 135 dwellings	LPR-D-283	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at South Bicester for 2850 dwellings	LPR-D-287	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Ells Lane, Bloxham for 30 dwellings	LPR-D-297	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at The Bretch for 300 dwellings	LPR-D-299	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at 14-16 Woodstock Road, Yarnton for 60 dwellings	LPR-D-304	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Buckingham Road, Bicester for residential development	LPR-D-079 (Thames Water)	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Banbury Road, Finmere	LPR-D-050	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Sugarswell Lane, Shenington (HELAA524)	LPR-D-207	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Dymocks Farm, Bicester	LPR-D-211	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Fulwell Road, Finmere (HELAA415) for residential development	LPR-D-220	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Hardwick Farm, Banbury for residential development	LPR-D-221	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land west of Fringford Road and north of Aunt Em's Lane, Caversfield for residential development	LPR-D-229	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land east of Adderbury for residential development	LPR-D-320	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Stocking Lane, Shenington for residential development	LPR-D-250	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land west of Sibford Road, Hook Norton for residential development	LPR-D-255	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land south of Camp Road, Heyford Park for residential development	LPR-D-258	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Islip for residential development	LPR-D-289	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Ploughley Road, Ambrosden for residential development	LPR-D-300	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Extension of North West Bicester for an initial 500 dwellings and two further phases	LPR-D-266	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Station Road, Hook Norton for 55 dwellings	LPR-D-211	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off Tadmarton Road, Bloxham for 60 dwellings	LPR-D-211	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Water Eaton for housing and employment development	LPR-D-223	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Caversfield	LPR-D-223	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land off School Lane, Cropredy for residential development	LPR-D-303	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land adjoining 'Judges' and land off 'The Greensward', Wardington for residential development	LPR-D-308	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land to the East of Stratfield Brake, for Oxford United Football Club	LPR-D-280	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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			housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north west of Bicester for Puy du Fou proposal	LPR-D-296	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Frieze Farm, for a Digital Innovation District (AI infrastructure and associated employment) on 35.8ha of land.	LPR-D-247	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of Wimborn Close, Deddington	LPR-D-155	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land at Islip	LPR-D-203	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Questions the omission of HELAA 394 and HELAA 034 from in the Local Plan	LPR-D-311	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land north of Dukes Meadow Drive, for up to 117 dwellings	LPR-D-248	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Oxford Technology Park Phase 2, Kidlington for employment use	LPR-D-193	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.
Omission Sites	Land east of Grange Park, south of The Beeches Footpath and west of Dr	N~~A~~	The CLPR spatial strategy has been positively prepared. It meets objectively assessed residential, employment and other development needs (including Oxford's unmet

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	Radcliffes School, Steeple Aston for 20-40 dwellings		housing needs). It is informed by up-to-date evidence and has been selected having considered reasonable alternatives as demonstrated in the Sustainability Appraisal.